DOCKETED	
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Project Title:	Carlsbad Energy Center - Compliance
TN #:	262796
Document Title:	ANNUAL COMPLIANCE REPORT- 2024
Description:	ANNUAL COMPLIANCE REPORT- 2024
Filer:	Anwar Ali
Organization:	Carlsbad Energy Center LLC
Submitter Role:	Commission Staff
Submission Date:	4/25/2025 9:58:18 AM
Docketed Date:	4/25/2025

Carlsbad Energy Center LLC
4950 Avenida Encinas
Carlsbad, CA 92008
Phone: 760-710-3970

March 17, 2025

Anwar Ali, Ph.D.
Compliance Project Manager
Carlsbad Energy Center Project (07-AFC-06C)
California Energy Commission
1516 Ninth Street (MS-2000)
Sacramento, CA 95814

RE: CARLSBAD ENERGY CENTER PROJECT, DOCKET NO. 07-AFC-06C
CONDITION OF CERTIFICATION, COM-7
ANNUAL COMPLIANCE REPORT, 2024

Dear Dr. Ali:

Carlsbad Energy Center LLC ("Project Owner") submits the 2024 Annual Compliance Report in compliance with the AFC Docket No. 07-AFC-06C, Conditions of Certification (COCs) COM-7 for the amended Carlsbad Energy Center Project (ACECP) located at 4950 Avenida Encinas, Carlsbad, California.

This report includes information that demonstrates the facility met all applicable conditions of certification during this operational period.

If you have any questions or comments, please do not hesitate to contact Ryan Stewart at (760) 710-3943.

Sincerely,

Paul Mattesich
Plant Manager
Carlsbad Energy Center LLC

Attached: Carlsbad Energy Center Project (07-AFC-06C), California Energy Commission, Annual Compliance Report, 2024

Cc: File

Carlsbad Energy Center Project (07-AFC-06C)

California Energy Commission Annual Compliance Report

2024

Submitted by: Carlsbad Energy Center LLC
Date Submitted: 03-17-2025

Table of Contents

List of Attachments

I. Summary

a. Project Annual Compliance Summary

The Carlsbad Energy Center Project (CECP) began commercial operation on December 12, 2018. In compliance with the California Energy Commission (Energy Commission) license, Carlsbad Energy Center LLC submits the information herein demonstrating compliance with condition of certification COM-8 Annual Compliance Report requirements.

This annual report includes data required by COM-7 for 2024.

II. Operational Status

a. CECP is commercially operational. No significant changes to operations occurred in 2024.

III. Post-Certification Changes to license 07-AFC-06C

a. There were numerous changes to license 07-AFC-06C in 2024, to reflect changes made by San Diego Air Pollution Control District. The following is a list of the modifications, deletions, and additions made to the license.

   i. Modify Conditions of Certification: AQ-1, AQ-2, AQ-7, AQ-9, AQ-12, AQ-14, AQ-15, AQ-17, AQ-23 to AQ-36, AQ-39 to AQ-52, AQ-54, AQ-61 to AQ-63, AQ-66, AQ-67, AQ-69, AQ-70, AQ-73, AQ-74, AQ-76 to AQ-78, AQ-80, AQ-81, AQ-83, AQ-84, AQ-87, AQ-88, AQ-94 to AQ-96, AQ-100, and AQ-101 to AQ-105.

   ii. Add new Conditions of Certification: AQ-13a, AQ-90a, and AQ-90.

   iii. Delete Conditions of Certification: AQ-SC9, AQ-SC12, AQ-SC13, AQ-3, AQ-4, AQ-6, AQ-8, AQ-13, AQ-18, AQ-19, AQ-60, AQ-64, AQ-71, AQ-79, AQ-82, AQ-85, AQ-86, AQ-90, AQ-92, AQ-93, AQ-106 to AQ-121.

IV. Submittal Deadlines Missed

a. No submittal deadlines were missed in 2024.

V. List of Files to and Permits Issued by Other Governmental Agencies

a. **Filings Submitted:**

   i. Monthly, quarterly, semi-annual, and annual reports filed in accordance with permit requirements during 2024.

b. **Permits issued:**

   i. Department of Environmental Health Annual Permit: DEH2018-HUPFP-004698- expires April 30, 2025

   ii. Encina Wastewater Authority Permit: #2480-B – does not expire

VI. Evaluation of the Site's Contingency Plan

a. The site's contingency plan was reviewed for potential updates in 2024.

b. The emergency contact list was reviewed for accuracy and minor updates were applied.

c. Various changes were made related to emergency supplies, chemicals, and hazardous materials location.

VII. List of Complaints, Notices of Violation, Official Warnings, Citations Received:

a. Carlsbad Energy Center did not receive a complaint, notice of violation, official warning, or a citation in 2024.

Attachment A BIO-2: Annual Biologist Report

Biological Resources Annual Compliance Report

Carlsbad Energy Center (07-AFC-06C), 2024 Reporting Period

PREPARED FOR
Carlsbad Energy Center

DATE
February 2025

REFERENCE
0751786

DOCUMENT DETAILS

The details entered below are automatically shown on the cover and the main page footer. PLEASE NOTE: This table must NOT be removed from this document.	
DOCUMENT TITLE	Biological Resources Annual Compliance Report
DOCUMENT SUBTITLE	Carlsbad Energy Center (07-AFC-06C), 2024 Reporting Period
PROJECT NUMBER	0751786
DATE	February 2025
VERSION (delete field if unneeded)	01
AUTHOR	Leigh Ann Boswell
CLIENT NAME	Carlsbad Energy Center

DOCUMENT HISTORY

				ERM APPROVAL TO ISSUE		
VERSION	REVISION	AUTHOR	REVIEWED BY	NAME	DATE	COMMENTS
Draft	01	Dr. Leigh Ann Boswell	Steve Williams	Steve Williams	01/17/2025	
Final	02	Dr. Leigh Ann Boswell	Steve Williams	Steve Williams	02/03/2025	

SIGNATURE PAGE

Biological Resources Annual Compliance Report

Carlsbad Energy Center (07-AFC-06C), 2024 Reporting Period

0751786

Steve Williams
Partner

Leigh Ann Boswell, PhD
Designated Biologist, Project Manager

Environmental Resources Management, Inc.
1920 Main Street
Suite 300
Irvine, California 92614

T +1 949 623 4700

CONTENTS

LIST OF FIGURES

ACRONYMS AND ABBREVIATIONS

Acronym	Description
ACR	Annual Compliance Report
BCC	Bird of Conservation Concern
BLM	Bureau of Land Management
BRMIMP	Biological Resources Mitigation Implementation and Monitoring Plan
CDF	California Department of Forestry & Fire Protection
CDFW	California Department of Fish and Wildlife
CEC	Carlsbad Energy Center
CECP	Carlsbad Energy Center Project
CNDDB	California Natural Diversity Database
COC	Conditions of Certification

Acronym	Description
ERM	Environmental Resources Management, Inc.
ESA	Endangered Species Act
MBTA	Migratory Bird Treaty Act
S	Sensitive
SCC	Species of Special Concern
USFS	United States Forest Service
USFWS	United States Fish and Wildlife Service
WEAP	Worker Environmental Awareness Program
WL	Watch List
WOF	Wildlife Observation Form

1. INTRODUCTION

This Annual Compliance Report (ACR) summarizes biological resources monitoring activities and documentation conducted during operations at the Carlsbad Energy Center (CEC; Figure 1) from 19 September through 31 December 2024, in accordance with the July 2015 Biological Resources Mitigation Implementation and Monitoring Plan and California Energy Commission Conditions of Certification (COCs) BIO-6.

Note, this ACR does not contain biological resources monitoring information for the first and second quarters of 2024 up to September. Those monitoring events were handled by the previous Designated Biologist, who unfortunately passed away in 2024 and the monitoring event reports are unable to be retrieved. This report therefore covers the third and fourth quarter 2024 monitoring events for the CEC site.

1.1 CARLSBAD ENERGY CENTER PROJECT PHASE I OVERVIEW

Tank demolition/removal, site preparation and remediation activities for Phase I of the Amended Carlsbad Energy Center Project (CECP) were completed in November 2015. Phase I berm removal commenced the first week of February 2016 and was completed in mid-May 2016.

1.2 CARLSBAD ENERGY CENTER PROJECT PHASE II OVERVIEW

The California Energy Commission's Compliance Project Manager approved the start of construction on 6 June 2016. Phase II of the Amended CECP began in February 2017 and was completed in October 2018 with complete demobilization in January 2019.

The Construction Closure Report was submitted to the California Energy Commission on March 18, 2019 and was approved on August 20, 2019.

1.3 CONDITIONS OF CERTIFICATION OVERVIEW

The following biological COCs covered by this ACR include, but are not limited to:

- BIO-2 Designated Biologist Duties
- BIO-5 Worker Environmental Awareness Program (WEAP)
- BIO-6 Biological Resources Mitigation Implementation and Monitoring Plan (BRMIMP)
- BIO-7 Impact Avoidance Mitigation Features
- BIO-8 Mitigation Management to Avoid Harassment or Harm

2. OPERATIONS MONITORING SUMMARY

This section summarizes biological monitoring activities conducted by Environmental Resources Management, Inc. (ERM) during the 2024 reporting period. This ACR documents site conditions and biological monitoring events for operations. As previously noted, CECP Phase I and Phase II have been completed.

The frequency and duration of monitoring is dependent upon nesting and migratory seasons and the biological resources located within, as well as transiting through, the work area. Biological

monitoring will continue on a quarterly basis (one visit per quarter), as well as on-call monitoring, until the Designated Biologist determines that a change is necessary for the protection of sensitive biological resources or a decrease in monitoring is warranted because of a lack of biological resources within the site.

The Biological Resources Compliance Monitoring Logs for the third and fourth quarter of 2024 are provided in Appendix A. A list of wildlife species observed during the monitoring events are included in Appendix B. Wildlife Observation Forms (WOFs) are provided in Appendix C.

2.1 CARLSBAD ENERGY CENTER PROJECT OPERATIONS MONITORNG EVENTS AND COMPLIANCE INSPECTIONS

CEC operational activities are monitored on a quarterly basis. Biological monitoring events occurred on 19 September and 15 November 2024. The Biological Resources Compliance Monitoring Logs are provided in Appendix A. As described in Section 1, biological monitoring event logs for the first and second quarter of 2024 are not contained in this report due to being unable to obtain them from the previous Designated Biologist. However, CEC confirmed that the monitoring events occurred on 6 March 2024 and 28 June 2024. Biological information from these two events is not contained in this ACR.

2.2 NESTING BIRDS

On 19 September 2024, no active nests were identified within the operating site. Inactive stick nests were observed in the transmission A-frames in the Bowl and in three of the four crane mechanisms in the Bowl. The nests were reported to the facility and all inactive nests were removed during scheduled maintenance.

On 15 November 2024, no active nests were identified within the operating site. Previously identified inactive stick nests were successfully removed.

The Biological Resources Compliance Monitoring Logs are provided in Appendix A and the WOF is provided in Appendix C.

2.3 SPECIAL STATUS SPECIES

Six special-status avian species and a single special-status insect species were observed in the vicinity of the site during the biological monitoring events, which included:

- American white pelican (*Pelecanus erythrorhynchos*; California Department of Fish and Wildlife [CDFW]: Species of Special Concern [SSC]; United States Fish and Wildlife Service [USFWS]: Bird of Conservation Concern [BCC])
- California brown pelican (*Pelecanus occidentalis californicus*; Bureau of Land Management [BLM]: Sensitive [S]; United States Forest Service [USFS]: S)
- Double-crested cormorant (*Nannopterum auritum*; CDFW: Watch List [WL])
- Great blue heron (*Ardea herodias*; California Department of Forestry [CDF]: S)
- Great egret (Ardea alba; CDF: S)

- Monarch butterfly (*Danaus plexippus*; Federal Endangered Species Act [ESA] Candidate; USFS: S)
- Osprey (*Pandion haliaetus*; CDFW: WL; CDF: S)

Buffer zones were not needed for these special-status species because there were no active nests within operating areas.

A list of wildlife species observed during the monitoring event is included in Appendix B. No observations were submitted to California Natural Diversity Database (CNDDB) because birds in transit (fly-overs) or foraging are not recorded according to CNDDB guidelines[1].

2.4 WILDLIFE DISPLACEMENT, INJURIES, AND MORTALITIES

2.4.1 MIGRATORY BIRD TREATY ACT PROTECTED SPECIES

No injured or dead species protected by the Migratory Bird Treaty Act (MBTA) or California Department of Fish and Game Codes (3503, 3503.5) were observed at the site.

A list of avian species observed during the monitoring events is included in Appendix B. No WOFs for avian species were needed for 2024.

2.4.2 OTHER SPECIES

On 19 September 2024, the remains of a striped skunk (*Mephitis mephitis*) skull were found in the bioswale area at the northern end of the site.

No other injured or dead wildlife species were observed at the site. A list of wildlife species observed during the monitoring events is included in Appendix B. The WOF for the deceased skunk identified on site is provided in Appendix C.

2.5 HAZARDOUS MATERIAL SPILLS

No hazardous material spills have occurred at the project site during the biological monitoring events.

2.6 TRASH

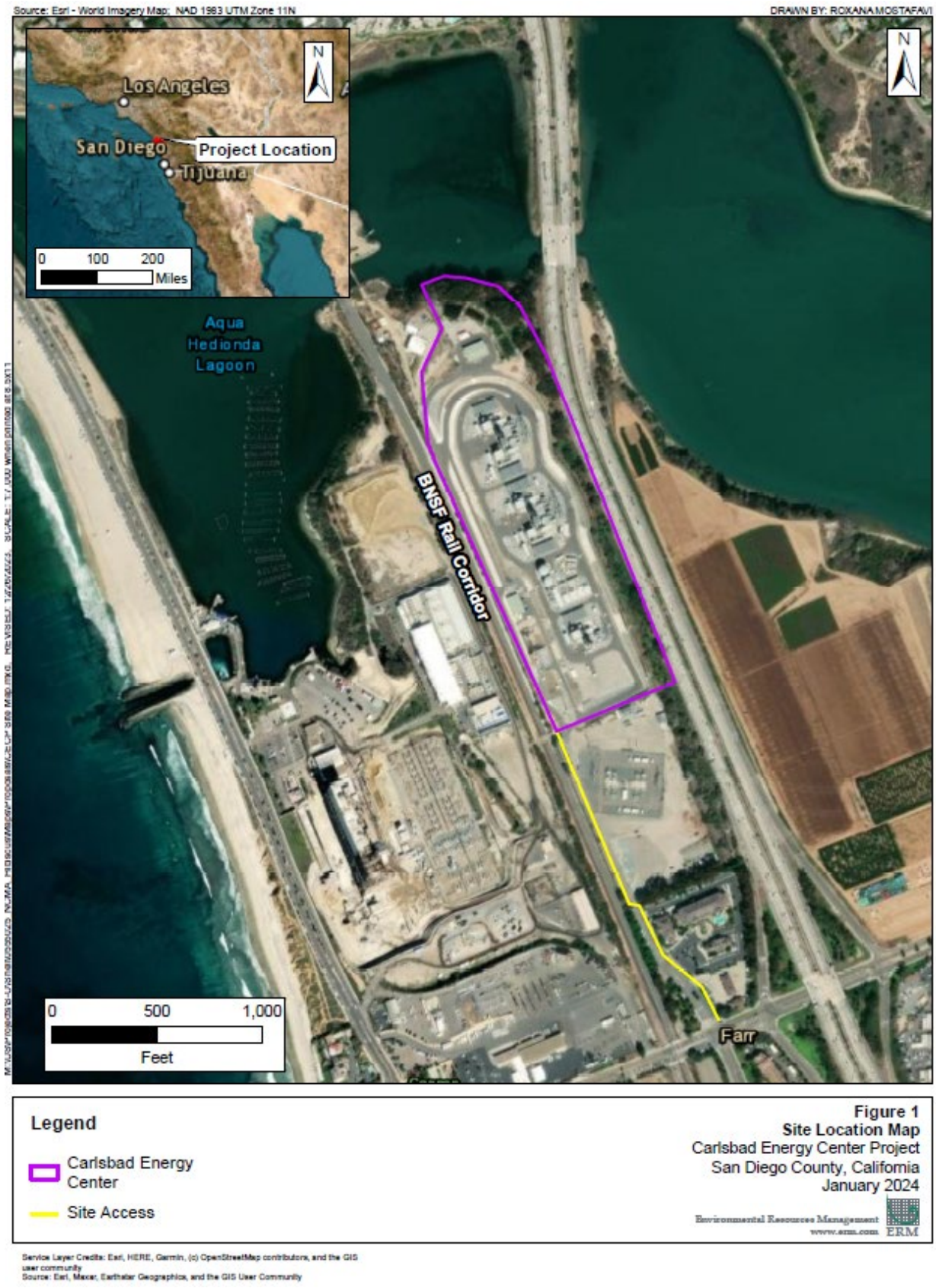
No litter was observed within the project site during the biological monitoring events.

2.7 NON-COMPLIANCE REPORT

No formal non-compliance notifications or incident reports were issued.

[1] CDFW. 2016. Submitting Avian Detections to the CNDDB. Available online at: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=25731

FIGURE 1 CARLSBAD ENERGY CENTER PROJECT LOCATION MAP



APPENDIX A BIOLOGICAL RESOURCES COMPLIANCE MONITORING LOGS

Carlsbad Energy Center (CEC)

BIOLOGICAL RESOURCES

COMPLIANCE MONITORING LOG - OPERATIONS

Date	Monitor	Time (Begin-End)
September 19, 2024	Kal Fountain	0700-1530

Temperature (°F)	Humidity (%)	Wind (mph)	Precipitation (Y/N, amount)	Visibility	Weather Comment
Low: 65 High: 77	60	1-2	N	Clear	100% cloud cover, overcast at 0700 30% partially cloudy, sunny by 1130

Site Location(s)

CEC site

Summary of Biological Resources Monitoring Observations

The Biological Monitor conducted a biological resources monitoring survey for biological constraints, special-status species, and nesting birds on the CEC site.

Bird/Nesting Birds Observations:

- No active bird nests, courtship, or nesting behavior was observed during the monitoring event.
- Biological monitoring event conducted outside of nesting season.

Special-Status Species Observed:

- Osprey (*Pandion haliaetus*; California Department of Fish and Wildlife [CDFW]: Watch List [WL]; California Department of Forestry [CDF]: Sensitive [S]) was observed perching in the bioswale area.
- Double-crested cormorants (*Nannopterum auritum*; CDFW: WL) were observed in Agua Hedionda, off the CEC property.
- A great blue heron (*Ardea herodias*; CDF: S) was observed in Agua Hedionda, off the CEC property.
- A great egret (*Ardea alba*; CDF: S) was observed in Agua Hedionda, off the CEC property.
- American white pelicans (*Pelecanus erythrorhynchos*; CDFW: Species of Special Concern [SSC]; United States Fish and Wildlife Service [USFWS]: Bird of Conservation Concern [BCC]) were observed flying over the site.

Other Biological Resources Observations:

- Ponded areas in front of bioswale acting as intended, filling with water (Photos 2 and 3).
- Striped skunk (*Mephitis mephitis*) skull fragments were observed within the bioswale.
- No additional observations were noted.

Other Observations/Comments:

- No additional observations were noted.

Items Requiring Action/Follow-up

- Old stick nests were found in various locations (photos below) and reported to site contact. The nests have been scheduled for removal during regularly scheduled maintenance.

Wildlife Species Observed:

Allen's hummingbird (*Selasphorus sasin*), American crow (*Corvus brachyrhynchos*), American kestrel (*Falco sparverius*), American white pelican, black phoebe (*Sayornis nigricans*), blue-gray gnatcatcher (*Polioptila caerulea*), bushtit (*Psaltriparus minimus*), common yellowthroat (*Geothlypis trichas*), double-crested cormorant, Eurasian collared-dove (*Streptopelia decaocto*), great blue heron, great egret, house sparrow (*Passer domesticus*), mourning dove (*Zenaida macroura*), northern house wren (*Troglodytes aedon*), orange crowned-warbler (*Leiothlypis celata*), osprey, red-shouldered hawk (*Buteo lineatus*), Say's phoebe (*Sayornis saya*), song sparrow (*Melospiza melodia*), striped skunk, and western gull (*Larus occidentalis*).

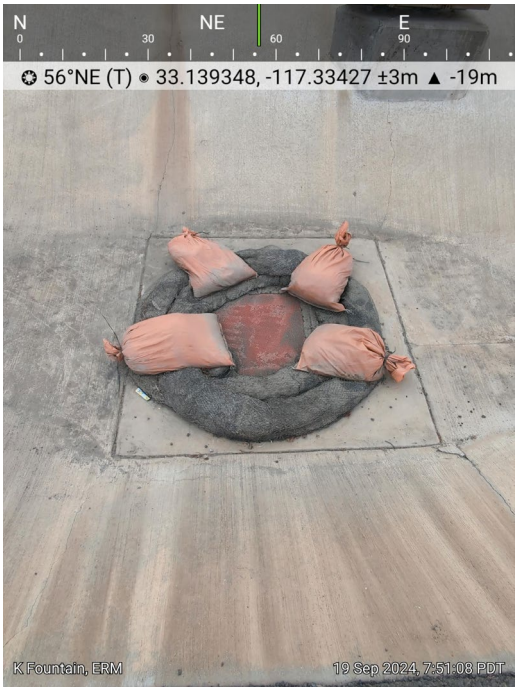
Photo 1			
			
Location	33.139348, -117.33427 Facing Northeast	**Description**	Wastewater BMPs in place on site.

Photo 2			
			
Location	33.143615, -117.335328 Facing Southeast	**Description**	Pond areas in front of bioswale acting as intended.

Photo 3			
			
Location	33.14347, -117.334996 Facing Southeast	**Description**	Pond areas in front of bioswale acting as intended.

Photo 4			
			
Location	33.142306, -117.333844 Facing Southwest	**Description**	Inactive stick nests found in transmission A-frames in Bowl. These are known to facility and plans are in place for removal during regularly scheduled maintenance.

Photo 5			
			
Location	33.142305, -117.333791 Facing West	**Description**	Inactive stick nests found in transmission A-frames in Bowl. These are known to facility and plans are in place for removal during regularly scheduled maintenance.

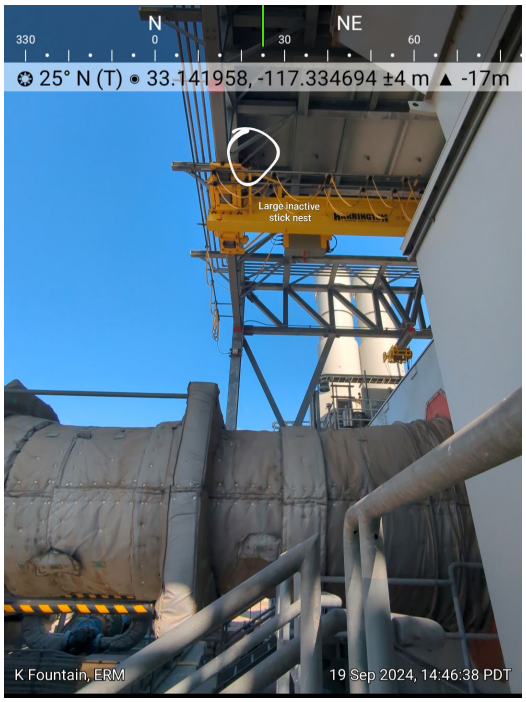
Photo 6			
			
Location	33.141958, -117.334694 Facing North	**Description**	Large inactive stick nests observed in 3 of 4 crane mechanisms in Bowl.

Photo 7			
			
Location	33.142, -117.334762 Facing Northeast	**Description**	Large inactive stick nests observed in 3 of 4 crane mechanisms in Bowl.

Photo 8			
			
Location	33.139056, -117.333166 Facing Northwest	**Description**	Trash cans held down and lids tightly fitted. No trash observed on site.

Carlsbad Energy Center (CEC)

BIOLOGICAL RESOURCES
COMPLIANCE MONITORING LOG - OPERATIONS

Date	Monitor	Time (Begin-End)
November 15, 2024	Kal Fountain	0700-1530

Temperature (°F)	Humidity (%)	Wind (mph)	Precipitation (Y/N, amount)	Visibility	Weather Comment
Low: 52 High: 66	10-15	6-13	N	10 miles	Wind gusts up to 20mph

Site Location(s)

CEC site

Summary of Biological Resources Monitoring Observations

The Biological Monitor conducted a biological resources monitoring survey for biological constraints, special-status species, and nesting birds on the CEC site.

Bird/Nesting Birds Observations:

- No active bird nests, courtship, or nesting behavior was observed during the monitoring event.
- Biological monitoring event conducted outside of nesting season.

Special-Status Species Observed:

- American white pelicans (*Pelecanus erythrorhynchos*; California Department of Fish and Wildlife [CDFW]: Species of Special Concern [SSC]; United States Fish and Wildlife Service [USFWS]: Bird of Conservation Concern [BCC]) were observed flying over site.
- California brown pelicans (*Pelecanus occidentalis californicus*; Bureau of Land Management [BLM]: Sensitive [S]; United States Forest Service [USFS]: S) were observed.
- Double-crested cormorants (*Nannopterum auritum*; CDFW: Watch List [WL]) were observed in Agua Hedionda, off the CEC property.
- A great blue heron (*Ardea herodias*; California Department of Forestry [CDF]: S) was observed in Agua Hedionda, off the CEC property.
- A great egret (*Ardea alba*; CDF: S) was observed in Agua Hedionda, off the CEC property.
- Monarch butterflies (*Danaus plexippus*; Federal Candidate; USFS: S) were observed.

Other Biological Resources Observations:

- No observations were noted.

Other Observations/Comments:

- Inactive stick nests found previously on CEC site have been successfully removed.
- No trash was observed.
- No additional observations were noted.

Items Requiring Action/Follow-up

- None.

Wildlife Species Observed:

American coot (*Fulica americana*), American crow (*Corvus brachyrhynchos*), American kestrel (*Falco sparverius*), American white pelican, Anna's hummingbird (*Calypte anna*), band-tailed pigeon (*Patagioenas fasciata*), black phoebe (*Sayornis nigricans*), blue-gray gnatcatcher (*Polioptila caerulea*), bushtit (*Psaltriparus minimus*), California brown pelican, California towhee (*Melozone crissalis*), common yellowthroat (*Geothlypis trichas*), double-crested cormorant, great blue heron, great egret, house finch (*Haemorhous mexicanus*), monarch butterfly, mourning dove (*Zenaida macroura*), northern mockingbird (*Mimus polyglottos*), red-tailed hawk (*Buteo jamaicensis*), ruby-crowned kinglet (*Corthylio calendula*), Say's phoebe (*Sayornis saya*), song sparrow (*Melospiza melodia*), turkey vulture (*Cathartes aura*), western gull (*Larus occidentalis*), yellow-rumped warbler (*Setophaga coronata*), and yellow warbler (*Setophaga petechia*).

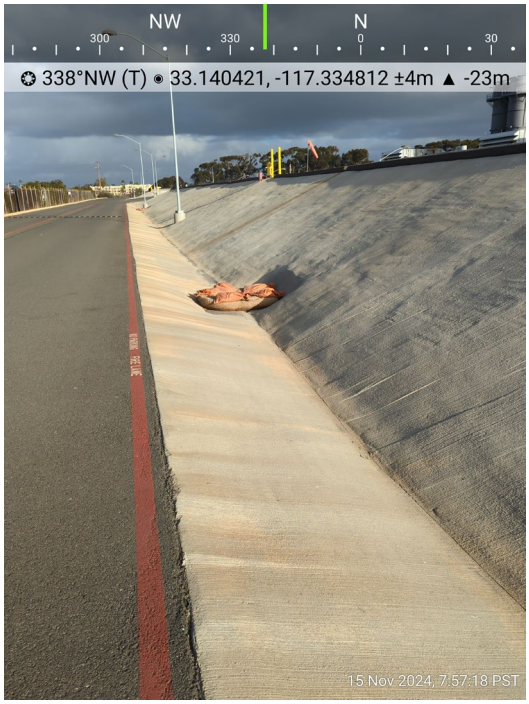
Photo 1			
			
Location	33.140421, -117.334812 Facing North/Northwest	**Description**	Wastewater BMPs in place and working as intended. No blockages or issues, or trash in gutters observed.

Photo 2			
			
Location	33.139134, -117.333364 Facing North	**Description**	Spill kits, tethered to structures and with tightly fastened lids, were observed throughout the site.

Photos 3

Location	33.141698, -117.334723 Facing SouthEast	**Description**	Inactive stick nest observed in Bowl has been successfully removed since previous biological monitoring event.

Photo 4

Location	33.141259, -117.333638 Facing East/Southeast	**Description**	No animal mortalities observed on site and site is clean and well-maintained.

APPENDIX B OBSERVED WILDLIFE SPECIES LIST

Observed Wildlife Species List 2024 Carlsbad Energy Center		
Common Name	**Scientific Name**	**Status Federal/State/Other***
Birds		
Allen's hummingbird	*Selasphorus sasin*	--/--/--
American coot	*Fulica americana*	--/--/--
American crow	*Corvus brachyrhynchos*	--/--/--
American kestrel	*Falco sparverius*	--/--/--
American white pelican	*Pelecanus erythrorhynchos*	BCC/SSC/--
Anna's hummingbird	*Calypte anna*	--/--/--
Band-tailed pigeon	*Patagioenas fasciata*	--/--/--
Black phoebe	*Sayornis nigricans*	--/--/--
Blue-gray gnatcatcher	*Polioptila caerulea*	--/--/--
Bushtit	*Psaltriparus minimus*	--/--/--
California brown pelican	*Pelecanus occidentalis californicus*	FD/SD/BLM:S, USFS:S
California towhee	*Melozone crissalis*	--/--/--
Common yellowthroat	*Geothlypis trichas*	--/--/--
Double-crested cormorant	*Nannopterum auritum*	--/WL/--
Eurasian collared-dove	*Streptopelia decaocto*	--/--/--
Great blue heron	*Ardea herodias*	--/--/CDF:S
Great egret	*Ardea alba*	--/--/CDF:S
House finch	*Haemorhous mexicanus*	--/--/--
House sparrow	*Passer domesticus*	--/--/--
Mourning dove	*Zenaida macroura*	--/--/--
Northern house wren	*Troglodytes aedon*	--/--/--
Northern mockingbird	*Mimus polyglottos*	--/--/--
Orange-crowned warbler	*Leiothlypis celata*	--/--/--
Osprey	*Pandion haliaetus*	--/WL/CDF:S
Red-shouldered hawk	*Buteo lineatus*	--/--/--
Red-tailed hawk	*Buteo jamaicensis*	--/--/--
Ruby-crowned kinglet	*Corthylio calendula*	--/--/--
Say's phoebe	*Sayornis saya*	--/--/--
Song sparrow	*Melospiza melodia*	--/--/--

Turkey vulture	*Cathartes aura*	--/--/--
Western gull	*Larus occidentalis*	--/--/--
Yellow-rumped warbler	*Setophaga coronata*	--/--/--
Yellow warbler	*Setophaga petechia*	--/--/--
Invertebrates		
Monarch butterfly	*Danaus plexippus*	FC/--/USFS:S
Mammals		
Striped skunk	*Mephitis mephitis*	--/--/--

Source: California Department of Fish and Wildlife (CDFW). 2024. California Natural Diversity Database. October. Special Animals List. Periodic Publications. Accessed on 24 December 2024. Accessed from: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109406&inline

Note:
Status Codes:
If status codes are not provided, it indicates that the observed species is not a special-status species.
Federal:
BCC = Birds of Conservation Concern
FC = Federal Candidate
FD = Federally Delisted
State:
SD = State Delisted
SSC = California Species of Special Concern: Species of concern to CDFW because of declining population levels, limited ranges, and/or continuing threats have made them vulnerable to extinction.
WL = Watch List
***Other:**
Bureau of Land Management (BLM): Sensitive (S)
California Department of Forestry and Fire Protection (CDF): Sensitive (S) - classifies "sensitive species" as those species that warrant special protection during timber operations.
U.S. Forest Service (USFS): Sensitive (S)

APPENDIX C WILDLIFE OBSERVATION FORMS

WILDLIFE OBSERVATION FORM

To Record Animals Found In Amended Carlsbad Energy Center Project (Amended CECP) Work Areas

To be filled out by personnel who find active nest sites, dens, and dead or injured wildlife, or other biological resources during daily construction activities.

Name of employee: Kal Fountain

Date: 19 September 2024

Location of observation: Skull fragments of striped skunk were observed in the bioswale at the north end of the site.

Wildlife Species: Striped skunk (*Mephitis mephitis*)

Condition of wildlife:

alive [ ] dead [X]

Possible cause of injury or death: Unknown

Where is the animal currently? Skull fragments were left in place due to location within the bioswale, which would have been unsafe to enter due to soggy/slippery conditions.

Is the resource in danger of project (or other) impacts?

No; resource has been deceased for a long time.

Comments:

Please contact the Designated Biologist for questions and to report any wildlife, nest, or den in the project area that could be disturbed. The Designated Biologist will advise personnel on measures required by California Department of Fish and Wildlife (CDFW) and United States Fish and Wildlife Service (USFWS) to protect fish, wildlife and vegetation from construction impacts.

DESIGNATED BIOLOGIST:
Leigh Ann Boswell; leighann.boswell@erm.com; Cell: (530) 613-2707; Office (949) 623-4700

COMPANY: Environmental Resources Management (ERM), Inc.
ADDRESS: 1920 Main Street, Suite 300, Irvine, CA 92614

ERM HAS OVER 140 OFFICES ACROSS THE FOLLOWING COUNTRIES AND TERRITORIES WORLDWIDE

Argentina
Australia
Belgium
Brazil
Canada
China
Colombia
Denmark
France
Germany
Hong Kong
India
Indonesia
Ireland
Italy
Japan
Kazakhstan
Kenya
Malaysia
Mexico
Mozambique
Netherlands
New Zealand
Panama
Peru
Poland
Portugal
Romania
Singapore
South Africa
South Korea
Spain
Switzerland
Taiwan
Thailand
UAE
UK
US
Vietnam

ERM's Irvine Office
1920 Main Street
Suite 300
Irvine, California, 92614

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www.erm.com

Attachment B HAZ-1: Hazardous Materials Business Plan

Site Identification

Carlsbad Energy Center Project
4950 Avenida Encinas
Carlsbad, CA 92008
County
San Diego

CERS ID
10765651
EPA ID Number
CAR000256545

Submittal Status

Submitted on 2/13/2025 by *Ryan Stewart* of Carlsbad Energy Center Project (Carlsbad, CA)

Hazardous Materials

Does your facility have on site (for any purpose) at any one time, hazardous materials at or above 55 gallons for liquids, 500 pounds for solids, or 200 cubic feet for compressed gases (include liquids in ASTs and USTs); or is regulated under more restrictive inventory local reporting requirements (shown below if present); or the applicable Federal threshold quantity for an extremely hazardous substance specified in 40 CFR Part 355, Appendix A or B; or handle radiological materials in quantities for which an emergency plan is required pursuant to 10 CFR Parts 30, 40 or 70?	**Yes**

Underground Storage Tank(s) (UST)

Does your facility own or operate underground storage tanks?	**No**

Hazardous Waste

Is your facility a Hazardous Waste Generator?	**Yes**
Does your facility treat hazardous waste on-site?	**No**
Is your facility's treatment subject to financial assurance requirements (for Permit by Rule and Conditional Authorization)?	**No**
Does your facility consolidate hazardous waste generated at a remote site?	**No**
Does your facility need to report the closure/removal of a tank that was classified as hazardous waste and cleaned on-site?	**No**
Does your facility generate in any single calendar month 1,000 kilograms (kg) (2,200 pounds) or more of federal RCRA hazardous waste, or generate in any single calendar month greater than 1 kg (2.2 pounds) of RCRA acute hazardous waste; or generate more than 100 kg (220 pounds) of spill cleanup materials contaminated with RCRA acute hazardous waste.	**No**
Is your facility a Household Hazardous Waste (HHW) Collection site?	**No**

Excluded and/or Exempted Materials

Does your facility recycle more than 100 kg/month of excluded or exempted recyclable materials (per HSC 25143.2)?	**No**

Aboveground Petroleum Storage

Does your facility own or operate aboveground petroleum storage tanks or containers AND: * have a total aboveground petroleum storage capacity of 1,320 gallons or more, OR * have one or more petroleum tanks in an underground area?	**Yes**

Regulated Substances

Does your facility have Regulated Substances stored onsite in quantities greater than the threshold quantities established by the California Accidental Release prevention Program (CalARP)?	**Yes**

Additional Information

No additional comments provided.

Facility/Site

Carlsbad Energy Center Project
4950 Avenida Encinas
Carlsbad, CA 92008

CERS ID
10765651

Submittal Status

Submitted on 2/13/2025 by *Ryan Stewart* of Carlsbad Energy Center Project (Carlsbad, CA)

Identification

NRG Energy Services

Operator Phone	Business Phone	Business Fax
(760) 710-3950	(760) 710-3950	

Beginning Date	Ending Date	
Dun & Bradstreet	**SIC Code**	**Primary NAICS**

Facility/Site Mailing Address

4950 Avenida Encinas
CARLSBAD, CA 92008-4301

Primary Emergency Contact

Control Room
Title
Control Room

Business Phone	24-Hour Phone	Pager Number
(760) 710-3950	(760) 710-3950	

Owner

Carlsbad Energy Center
(760) 710-3945
4950 Avenida Encinas
Carlsbad, CA 92008

Secondary Emergency Contact

Paul Mattesich
Title
Plant Manager

Business Phone	24-Hour Phone	Pager Number
(760) 710-3945	(805) 616-5836	

Billing Contact

David Brown
(760) 710-3952 david.brown1@nrg.com
4950 Avenida Encinas
CARLSBAD, CA 92008

Environmental Contact

Ryan Stewart
(760) 710-3943 Ryan.Stewart@nrg.com
4950 Avenida Encinas
CARLSBAD, CA 92008

Name of Signer	Signer Title	Document Preparer
Paul Mattesich	Plant Manager	Paul Mattesich

Additional Information
Updated to add Ryan Stewart as the Environmental site contact.

Locally-collected Fields

Some or all of the following fields may be required by your local regulator(s).

Property Owner

Carlsbad Energy Center
Phone
(760) 710-3950
Mailing Address
4950 Avenida Encinas
Carlsbad, CA 92008

Assessor Parcel Number (APN)
210-010-47-00
Number of Employees
18
Facility ID
37-000-004698

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **Carlsbad Energy Center Project**
Facility Name **Carlsbad Energy Center Project**
4950 Avenida Encinas, Carlsbad 92008

Chemical Location

CERS ID **10765651**
Facility ID **37-000-004698**
Status **Submitted** on 2/12/2025 12:26 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Quantities: Largest Cont.	Quantities: Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
DOT: 8 - Corrosives (Liquids and Solids)	**Corrshield MD4100** CAS No	**Gallons** State: Liquid Type: Mixture	**100** Storage Container: Plastic/Non-metalic Drum Days on Site: 365	**30**	55 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Corrosive To Metal - Health Carcinogenicity - Health Acute Toxicity - Health Skin Corrosion Irritation - Health Serious Eye Damage Eye Irritation - Health Specific Target Organ Toxicity	Sodium Nitrite	20%		7632-00-0
DOT: 3 - Flammable and Combustible Liquids Combustible Liquid, Class II	**Diesel Fuel, #2** CAS No: 68334-30-5	**Gallons** State: Liquid Type: Pure	**600** Storage Container: Steel Drum, Can Days on Site: 365	**500**	500 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Flammable - Health Carcinogenicity - Health Acute Toxicity - Health Skin Corrosion Irritation - Health Serious Eye Damage Eye Irritation				
DOT: 3 - Flammable and Combustible Liquids Flammable Liquid, Class I-B	**Gasoline** CAS No: 86290-81-5	**Gallons** State: Liquid Type: Pure	**200** Storage Container: Can Days on Site: 365	**5**	100 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Flammable - Health Carcinogenicity - Health Acute Toxicity - Health Serious Eye Damage Eye Irritation - Health Specific Target Organ Toxicity				

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **Carlsbad Energy Center Project**
Facility Name **Carlsbad Energy Center Project**
4950 Avenida Encinas, Carlsbad 92008

Chemical Location

CERS ID **10765651**
Facility ID **37-000-004698**
Status **Submitted** on 2/12/2025 12:26 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Quantities: Largest Cont.	Quantities: Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
DOT: 8 - Corrosives (Liquids and Solids) Corrosive	**Lead Acid Batteries** CAS No	**Gallons** State: Liquid Type: Mixture	**195** Storage Container: Other Days on Site: 365	**13**	195 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Flammable - Physical Explosive - Health Carcinogenicity - Health Acute Toxicity - Health Reproductive Toxicity - Health Skin Corrosion Irritation - Health Serious Eye Damage Eye Irritation - Health Specific Target Organ Toxicity	Sulfuric Acid Lead	30% 70%	✓	7664-93-9 7439-92-1
DOT: 2.1 - Flammable Gases Flammable Gas	**Liquefied Petroleum Gas (lpg)** CAS No: 74-98-6	**Gallons** State: Gas Type: Pure	**30** Storage Container: Cylinder Days on Site: 365	**5**	25 Pressue: > Ambient Temperature: Ambient	Waste Code	- Physical Flammable - Physical Gas Under Pressure				
DOT: 9 - Misc. Hazardous Materials	**Natural Gas Knockout Tank Oil Waste** CAS No	**Gallons** State: Liquid Type: Waste	**300** Storage Container: Aboveground Tank, Steel Drum, Tank Wagon	**55**	200 Pressue: Ambient Temperature: Ambient	800 Waste Code: 331	- Health Carcinogenicity	Benzene	0%	✓	71-43-2
DOT: 2.2 - Nonflammable Gases	**Nitrogen** CAS No: 7727-37-9	**Cu. Feet** State: Gas Type: Pure	**18000** Storage Container: Cylinder Days on Site: 365	**304**	3600 Pressue: > Ambient Temperature: Ambient	Waste Code	- Physical Gas Under Pressure				
	Simple Green CAS No	**Gallons** State: Liquid Type: Mixture	**330** Storage Container: Tote Bin Days on Site: 365	**330**	220 Pressue: Ambient Temperature: Ambient	Waste Code	- Health Hazard Not Otherwise Classified	C9-11 Alcohols Ethoxylated Sodium Citrate Sodium Carbonate Citric Acid Tetrasodium Glutamate Diacetate	5% 5% 1% 1% 1%		68439-46-3 68-04-2 497-19-8 77-92-9 51981-21-6

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **Carlsbad Energy Center Project**
Facility Name **Carlsbad Energy Center Project**
4950 Avenida Encinas, Carlsbad 92008

Chemical Location

CERS ID **10765651**
Facility ID **37-000-004698**
Status **Submitted** on 2/12/2025 12:26 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Quantities: Largest Cont.	Quantities: Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
DOT: 2.2 - Nonflammable Gases	**CARBON DIOXIDE, COMPRESSED GAS** CAS No 124-38-9	**Cu. Feet** State Gas Type Pure	**2500** Storage Container Cylinder Days on Site: 365	**143**	400 Pressue > Ambient Temperature Ambient	Waste Code	- Physical Gas Under Pressure				
	Nytro 11 GBXUS Transformer Oil CAS No	**Gallons** State Liquid Type Mixture	**49000** Storage Container Aboveground Tank Days on Site: 365	**9062**	49000 Pressue Ambient Temperature Ambient	Waste Code	- Health Skin Corrosion Irritation - Health Respiratory Skin Sensitization - Health Serious Eye Damage Eye Irritation	Hydrotreated Light Naphthenic Distillate Hydrotreated Middle Naphthenic Distillate Solvent-dewaxed light paraffinic 2,6-ditertiary butyl-4-methyl phenol	60% 40% 40% 0%		64742-53-6 64742-46-7 64742-56-9 128-37-0

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **Carlsbad Energy Center Project**
Facility Name **Carlsbad Energy Center Project**
4950 Avenida Encinas, Carlsbad 92008

Chemical Location
(8) Electrical Breakers throughout Facility

CERS ID **10765651**
Facility ID **37-000-004698**
Status **Submitted** on 2/12/2025 12:26 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Quantities: Largest Cont.	Quantities: Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
DOT: 2.2 - Nonflammable Gases	**Sulfur Hexafluoride** CAS No 2551-62-4	**Cu. Feet** State Gas Type Pure	**2951** Storage Container Other Days on Site: 365	**575**	2951 Pressue > Ambient Temperature > Ambient	Waste Code	- Physical Gas Under Pressure - Health Simple Asphyxiant				

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **Carlsbad Energy Center Project**
Facility Name **Carlsbad Energy Center Project**
4950 Avenida Encinas, Carlsbad 92008

Chemical Location **Ammonia Tank**

CERS ID **10765651**
Facility ID **37-000-004698**
Status **Submitted** on 2/12/2025 12:26 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Quantities: Largest Cont.	Quantities: Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
DOT: 2.2 - Nonflammable Gases Corrosive, Flammable Gas	**Aqueous Ammonia** CAS No	**Gallons** State: Liquid Type: Mixture	**15000** Storage Container: Aboveground Tank Days on Site: 365	**16067**	15000 Pressue: Ambient Temperature: Ambient	Waste Code	- Health Skin Corrosion Irritation - Health Respiratory Skin Sensitization - Health Serious Eye Damage Eye Irritation	Ammonia	19%	✓	7664-41-7

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **Carlsbad Energy Center Project**
Facility Name **Carlsbad Energy Center Project**
4950 Avenida Encinas, Carlsbad 92008

Chemical Location **Fuel Gas Compressors**

CERS ID **10765651**
Facility ID **37-000-004698**
Status **Submitted** on 2/12/2025 12:26 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities Max. Daily	Largest Cont.	Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only) Component Name	% Wt	EHS	CAS No.
	SAE 40 wt Engine Oil - Compressors CAS No	**Gallons** State: Liquid Type: Mixture	**275** Storage Container: Other Days on Site: 365	**55**	220 Pressue: Ambient Temperature: Ambient	Waste Code	- Health Skin Corrosion Irritation - Health Respiratory Skin Sensitization - Health Serious Eye Damage Eye Irritation	1-DECENE, HOMOPOLYMER HYDROGENATED TRIPHENYL PHOSPHATE	40% 0%		68037-01-4 115-86-6

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **Carlsbad Energy Center Project**
Facility Name **Carlsbad Energy Center Project**
4950 Avenida Encinas, Carlsbad 92008

Chemical Location **Hazardous Waste Storage Area**

CERS ID **10765651**
Facility ID **37-000-004698**
Status **Submitted** on 2/12/2025 12:26 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Quantities: Largest Cont.	Quantities: Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
DOT: 3 - Flammable and Combustible Liquids Flammable Liquid, Class I-B	**Misc Aerosols Waste** CAS No	**Pounds** State: Liquid Type: Waste	**100** Storage Container: Steel Drum Days on Site: 365	**100**	20 Pressue: Ambient Temperature: Ambient	25 Waste Code: 352	- Physical Flammable - Physical Gas Under Pressure - Health Skin Corrosion Irritation - Health Serious Eye Damage Eye Irritation - Health Aspiration Hazard				
DOT: 9 - Misc. Hazardous Materials	**USED OIL** CAS No	**Gallons** State: Liquid Type: Waste	**165** Storage Container: Steel Drum Days on Site: 365	**55**	110 Pressue: Ambient Temperature: Ambient	165 Waste Code: 221	- Health Hazard Not Otherwise Classified	Waste Petroleum Hydrocarbons			Mixture
DOT: 9 - Misc. Hazardous Materials	**Used Oil With Benzene** CAS No	**Gallons** State: Liquid Type: Waste	**165** Storage Container: Steel Drum Days on Site: 365	**55**	55 Pressue: Ambient Temperature: Ambient	495 Waste Code: 221	- Health Carcinogenicity - Health Hazard Not Otherwise Classified	Waste Petroleum Hydrocarbons Benzene	98% 2%		Mixture 71-43-2
DOT: 9 - Misc. Hazardous Materials	**Waste Air Filters** CAS No	**Pounds** State: Solid Type: Waste	**500** Storage Container: Box Days on Site: 90	**500**	500 Pressue: Ambient Temperature: Ambient	500 Waste Code: 352	- Health Hazard Not Otherwise Classified				
DOT: 3 - Flammable and Combustible Liquids Flammable Liquid, Class I-A	**Waste Lab Pack** CAS No	**Pounds** State: Liquid Type: Waste	**20** Storage Container: Plastic/Non-metalic Drum Days on Site: 90	**20**	20 Pressue: Ambient Temperature: Ambient	20 Waste Code: 551	- Physical Flammable				
DOT: 9 - Misc. Hazardous Materials	**Waste Oil Filters** CAS No	**Pounds** State: Solid Type: Waste	**800** Storage Container: Box Days on Site: 90	**800**	500 Pressue: Ambient Temperature: Ambient	1500 Waste Code: 352	- Health Hazard Not Otherwise Classified				
DOT: 9 - Misc. Hazardous Materials	**Waste Oil Filters with Benzene** CAS No	**Pounds** State: Solid Type: Waste	**500** Storage Container: Box Days on Site: 90	**500**	500 Pressue: Ambient Temperature: Ambient	500 Waste Code: 352	- Health Carcinogenicity - Health Hazard Not Otherwise Classified	Benzene	2%		71-43-2

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **Carlsbad Energy Center Project**
Facility Name **Carlsbad Energy Center Project**
4950 Avenida Encinas, Carlsbad 92008

Chemical Location **Hazardous Waste Storage Area**

CERS ID **10765651**
Facility ID **37-000-004698**
Status **Submitted** on 2/12/2025 12:26 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Quantities: Largest Cont.	Quantities: Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
DOT: 9 - Misc. Hazardous Materials	**WASTE OILY DEBRIS** CAS No	**Pounds** State: Solid Type: Waste	**800** Storage Container: Steel Drum Days on Site: 365	**150**	300 Pressue: Ambient Temperature: Ambient	2000 Waste Code: 352	- Health Hazard Not Otherwise Classified				
DOT: 9 - Misc. Hazardous Materials	**Waste Oily Debris with Benzene** CAS No	**Pounds** State: Solid Type: Waste	**450** Storage Container: Steel Drum Days on Site: 365	**150**	150 Pressue: Ambient Temperature: Ambient	1000 Waste Code: 181	- Health Carcinogenicity - Health Hazard Not Otherwise Classified	Oil with Benzene	10%		
	Waste Oily Water CAS No	**Gallons** State: Liquid Type: Waste	**330** Storage Container: Steel Drum Days on Site: 180	**55**	55 Pressue: Ambient Temperature: Ambient	1300 Waste Code: 223	- Health Hazard Not Otherwise Classified	Water Oil			
DOT: 4.1 - Flammable Solids Flammable Solid	**Waste Paint Debris** CAS No	**Pounds** State: Solid Type: Waste	**250** Storage Container: Steel Drum, Fiber Drum Days on Site: 180	**250**	100 Pressue: Ambient Temperature: Ambient	500 Waste Code: 331	- Physical Flammable				
	Waste Spent Dessicant CAS No	**Pounds** State: Solid Type: Waste	**10** Storage Container: Plastic/Non-metalic Drum Days on Site: 90	**10**	5 Pressue: Ambient Temperature: Ambient	15 Waste Code:	- Health Hazard Not Otherwise Classified				

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **Carlsbad Energy Center Project**
Facility Name **Carlsbad Energy Center Project**
4950 Avenida Encinas, Carlsbad 92008

Chemical Location **In Equipment, Oil Storage**

CERS ID **10765651**
Facility ID **37-000-004698**
Status **Submitted** on 2/12/2025 12:26 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities Max. Daily	Largest Cont.	Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only) Component Name	% Wt	EHS	CAS No.
	Hydraulic Lube Oil CAS No	**Gallons** State: Liquid Type: Mixture	**500** Storage Container: Steel Drum, Other Days on Site: 365	**55**	330 Pressue: Ambient Temperature: Ambient	Waste Code	- Health Respiratory Skin Sensitization - Health Serious Eye Damage Eye Irritation - Health Hazard Not Otherwise Classified	2,6-DI-TERT-BUTYL-P-CRESOL NAPHTHALENESULFONIC ACID, DINONYL-, CALCIUM PHOSPHORODITHIOIC ACID, MIXED 0,0-BIS(2-ETHYL	0% 1% 1%		128-37-0 57855-77-3 68442-22-8
DOT: 3 - Flammable and Combustible Liquids	**Mineral Lube Oil** CAS No	**Gallons** State: Liquid Type: Mixture	**48000** Storage Container: Steel Drum, Other Days on Site: 365	**7400**	46000 Pressue: Ambient Temperature: Ambient	Waste Code	- Health Skin Corrosion Irritation - Health Respiratory Skin Sensitization - Health Serious Eye Damage Eye Irritation	2,6-DI-TERT-BUTYLPHENOL	1%		128-39-2
Combustible Liquid, Class II	**Synthetic Lube Oil** CAS No	**Gallons** State: Liquid Type: Mixture	**2000** Storage Container: Steel Drum, Other Days on Site: 365	**195**	1500 Pressue: Ambient Temperature: Ambient	Waste Code	- Physical Hazard Not Otherwise Classified - Health Hazard Not Otherwise Classified	N-PHENYL-1-NAPHTHYLAMINE 9,10-ANTHRACENEDIONE, 1,4-DIHYDROXY- ALKYLATED DIPHENYL AMINES TRICRESYL PHOSPHATE	1% 0% 5% 3%		90-30-2 81-64-1 68411-46-1 1330-78-5

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **Carlsbad Energy Center Project**
Facility Name **Carlsbad Energy Center Project**
4950 Avenida Encinas, Carlsbad 92008

Chemical Location **Unit CEMS, Compressed Gas Storage**

CERS ID **10765651**
Facility ID **37-000-004698**
Status **Submitted** on 2/12/2025 12:26 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Quantities: Largest Cont.	Quantities: Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
	CEMS GAS, CO CAS No	**Cu. Feet** State: Gas Type: Mixture	**3840** Storage Container: Cylinder Days on Site: 365	**240**	1920 Pressue: > Ambient Temperature: Ambient	Waste Code	- Physical Flammable - Physical Gas Under Pressure - Health Acute Toxicity - Health Reproductive Toxicity - Health Specific Target Organ Toxicity - Health Simple Asphyxiant	Carbon Monoxide Nitrogen Nitric Oxide	0% 100% 0%	 ✓	630-08-0 7727-37-9 10102-43-9
	CEMS GAS, NO CAS No	**Cu. Feet** State: Gas Type: Mixture	**3840** Storage Container: Cylinder Days on Site: 365	**240**	2400 Pressue: > Ambient Temperature: Ambient	Waste Code	- Physical Gas Under Pressure - Physical Oxidizer - Health Skin Corrosion Irritation - Health Serious Eye Damage Eye Irritation - Health Specific Target Organ Toxicity	Nitrogen Nitric Oxide Carbon Monoxide	100% 0% 0%	 ✓ 	7727-37-9 10102-43-9 630-08-0
	CEMS GAS, O2 CAS No	**Cu. Feet** State: Gas Type: Mixture	**3840** Storage Container: Cylinder Days on Site: 365	**240**	2400 Pressue: > Ambient Temperature: Ambient	Waste Code	- Physical Gas Under Pressure	Nitrogen Oxygen	80% 20%		7727-37-9 7782-44-7

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **Carlsbad Energy Center Project**
Facility Name **Carlsbad Energy Center Project**
4950 Avenida Encinas, Carlsbad 92008

Chemical Location **Water Tank Area**

CERS ID **10765651**
Facility ID **37-000-004698**
Status **Submitted** on 2/12/2025 12:26 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Quantities: Largest Cont.	Quantities: Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
DOT: 8 - Corrosives (Liquids and Solids) Corrosive, Oxidizing, Class 2	**Sodium Hypochlorite 12.5%** CAS No 7681-52-9	**Gallons** State Liquid Type Pure	**2310** Storage Container Tote Bin, Other Days on Site: 365	**330**	1320 Pressue Ambient Temperature Ambient	Waste Code	- Health Skin Corrosion Irritation - Health Serious Eye Damage Eye Irritation	Sodium Hypochlorite	13%		7681-52-9

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **Carlsbad Energy Center Project**
Facility Name **Carlsbad Energy Center Project**
4950 Avenida Encinas, Carlsbad 92008

Chemical Location **Welding Area**

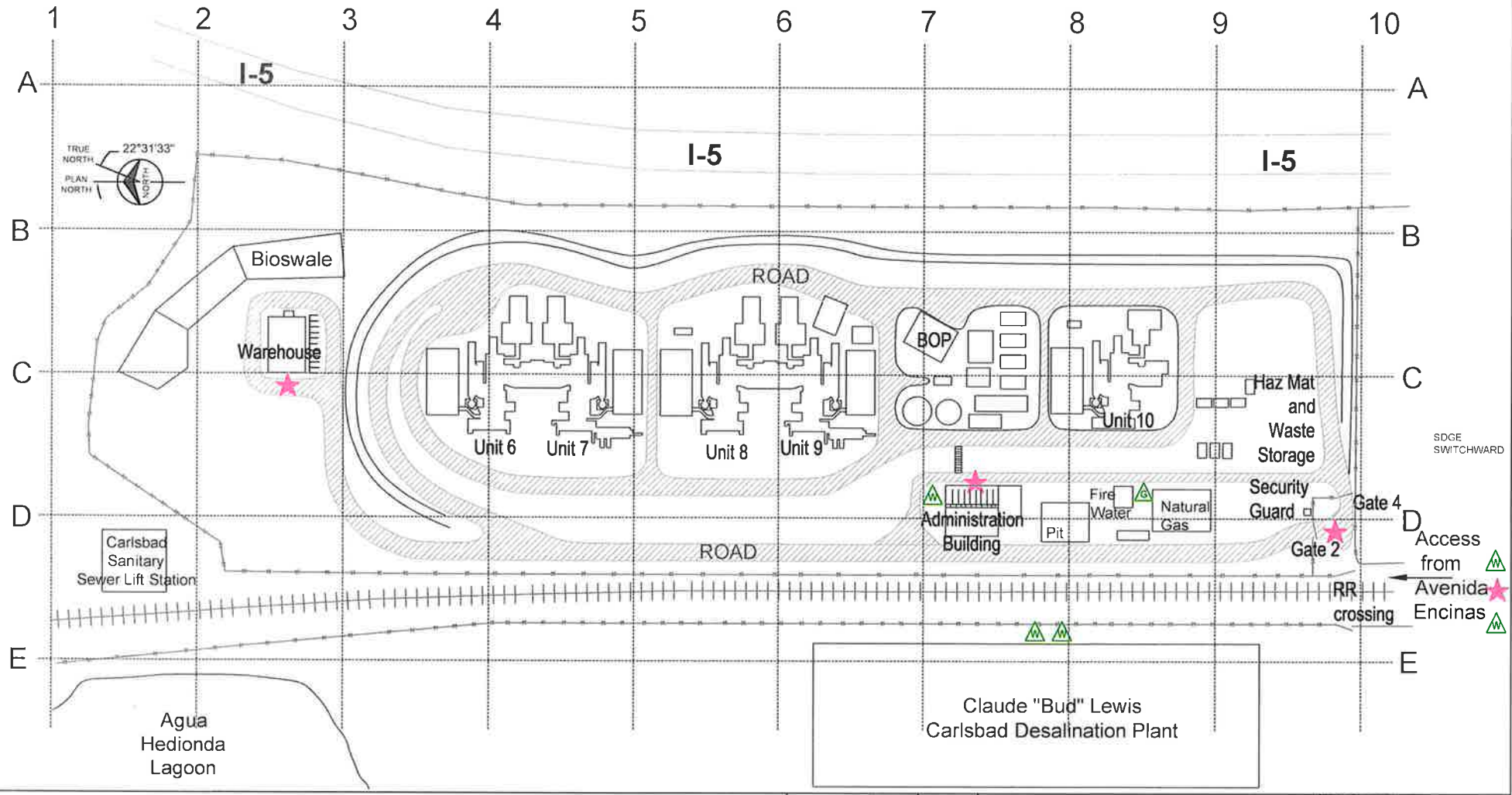
CERS ID **10765651**
Facility ID **37-000-004698**
Status **Submitted** on 2/12/2025 12:26 PM

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities: Max. Daily	Largest Cont.	Avg. Daily	Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only): Component Name	% Wt	EHS	CAS No.
DOT: 2.1 - Flammable Gases Unstable (Reactive), Class 2, Flammable Gas	**Acetylene** CAS No 74-86-2	**Cu. Feet** State Gas Type Pure	**435** Storage Container Cylinder Days on Site: 365	**145**	145 Pressue > Ambient Temperature Ambient	Waste Code	- Physical Flammable - Physical Gas Under Pressure				
DOT: 2.2 - Nonflammable Gases	**Argon Compressed** CAS No 7440-37-1	**Cu. Feet** State Gas Type Pure	**732** Storage Container Cylinder Days on Site: 365	**244**	244 Pressue > Ambient Temperature Ambient	Waste Code	- Physical Gas Under Pressure				
DOT: 2.2 - Nonflammable Gases Oxidizing, Class 2	**Oxygen Gas** CAS No 7782-44-7	**Cu. Feet** State Gas Type Pure	**732** Storage Container Cylinder Days on Site: 365	**244**	244 Pressue > Ambient Temperature Ambient	Waste Code	- Physical Gas Under Pressure - Physical Oxidizer				

Site Name: CARLSBAD ENERGY CENTER LLC

Site Address: 4950 Avenida Encinas, Carlsbad CA 92008

Date:3/15/2024



REVISIONS

H Update Added waste in FGC °C Removed Old control house Added simple Green Added SF6 DWN PH 12/27/18 CHK'D TS 12/27/18 APPD APPD	J Update Added one (1) haz storage comex DWN PH 2/18/22 CHK'D PM-TS 2/18/22 APPD APPD	K Update Removed Acetylene from page 8 Some symbols enlarged and moved for easier reading Waste moved outside FGC °C' DWN PH 3/4/22 CHK'D TS 3/7/22 APPD APPD	L Moving diesel gen on page 2 Adding Diesel Fueling Tank on page 2 DWN PH 10/24/2022 CHK'D RS 10/24/2022 APPD PM APPD	M Moved Conshtek to N wall of warehouse. Removing Spectrus NX 1100 Control 6000 moved to warehouse Gasoline pump and generator moved 30 feet west. DWN PH 5/25/23 CHK'D RS 5/25/23 APPD PM APPD	N Removed fam. cabinet with sanitizer on page 2 Added flammable cabinet on page 3 with Miscellaneous aerosols DWN PH 11/15/23 CHK'D RS 11/15/23 APPD PM APPD	P Added ammonia skid to each unit DWN PH 3/15/2024 CHK'D RGS 3/18/2024 APPD PM APPD

AUTOCAD VERSION	2024
DATE	10-17-18
DWN	PH
CHK'D	RG
APPD	
AUTOCAD FILE NAME	CEC OUTLINE rev P
PONMS EQUIP. NO.	____ * ____ * ____
FACILITY	Carlsbad Energy Center

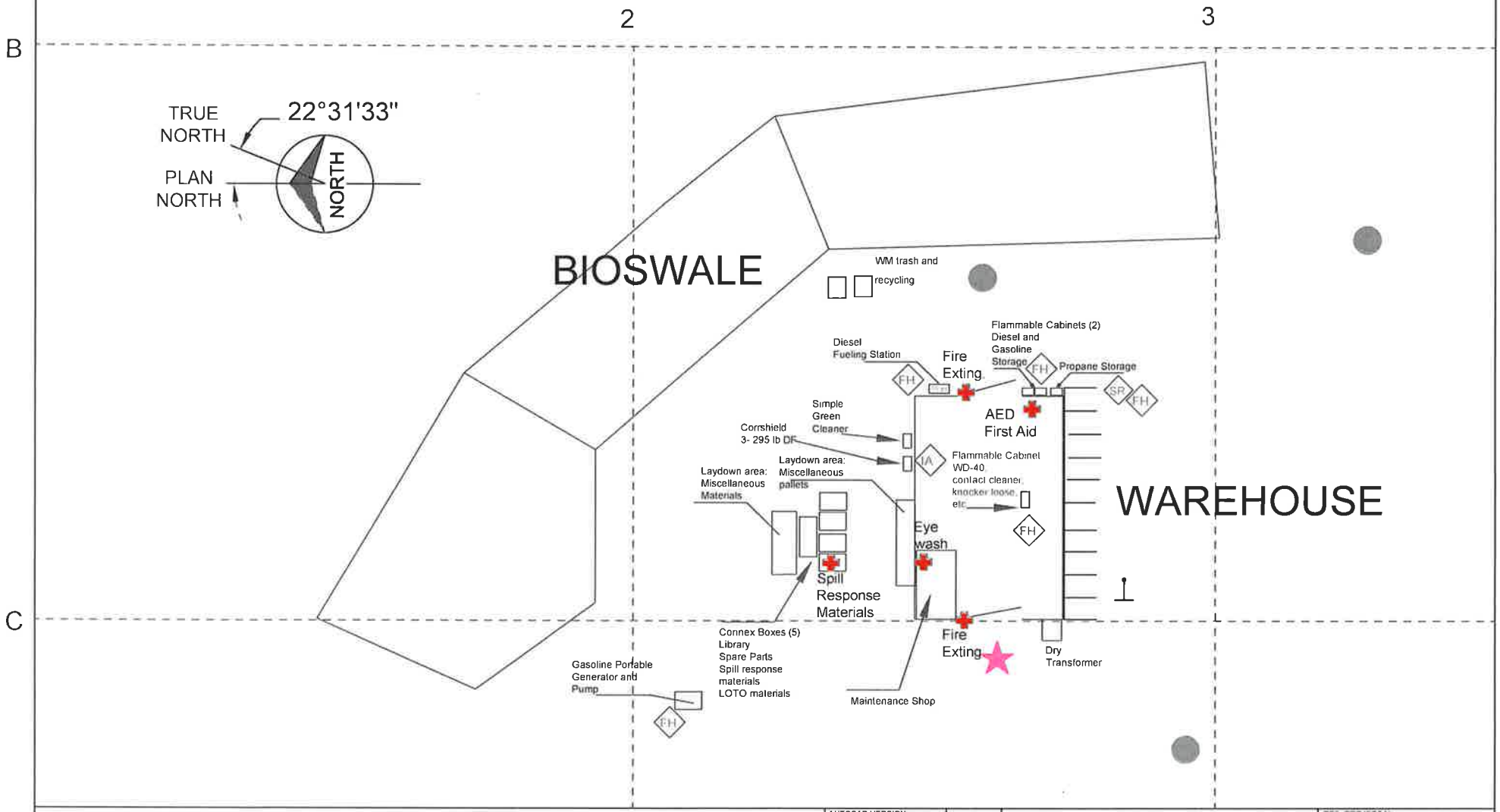
Carlsbad Energy Center General Plan

REF PROJECT No	
PROJECT No	DEH HazBizPlan
WO	
SCALE	NONE
PLOT SCALE	1=1
SHEET	1
REV	
DWG No	CEC01
REV	P

Site Name: CARLSBAD ENERGY CENTER LLC

Site Address: 4950 Avenida Encinas, Carlsbad CA 92008

Date:3/15/2024



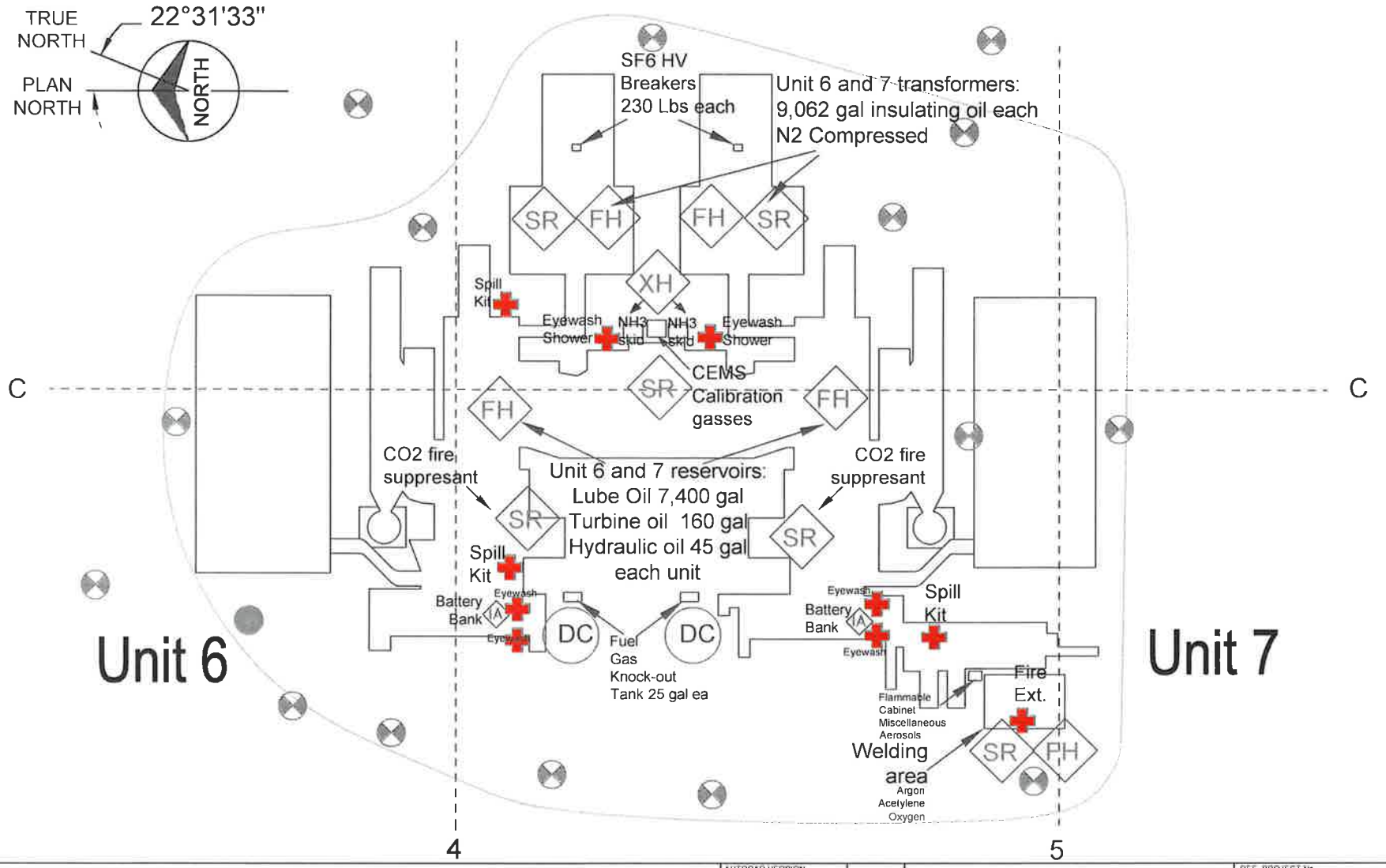
REVISIONS						
H Update: Added waste in FGC °C. Removed Old control house. Added simple Green. Added SF6. DWN PH 12/27/18; CHKD TS 12/27/18; APPD; APPD	J Update: Added one (1) haz storage connex. DWN PH 2/15/22; CHKD PM-TS 2/15/22; APPD; APPD	K Update: Removed Acetylene from page 6 + moved for easier reading. Waste moved outside FGC °C. DWN PH 3/4/22; CHKD TS 3/7/22; APPD; APPD	L Moving diesel gen on page 2. Adding Diesel fueling station. to page 2. DWN PH 10/24/2022; CHKD RS 10/24/2022; APPD PM; APPD	M Moved Corrshield to N wall of warehouse. Removing Spectrus NX 1100 Corrshield 6000 moved to warehouse. Gasoline pump and generator moved 30 feet west. DWN PH 5/25/23; CHKD RS 5/25/23; APPD PM; APPD	N Removed flam. cabinet with sanitizer on page 2. Added flammable cabinet on page 3 with Miscellaneous aerosols. DWN PH 11/15/23; CHKD RS 11/15/23; APPD PM; APPD	P Added ammonia skid to each unit. DWN PH 3/15/2024; CHKD RS 3/18/2024; APPD PM; APPD

AUTOCAD VERSION 2024	DATE		REF PROJECT No NA
DWN PH	10/17/2016		PROJECT No NA
CHKD RG		FACILITY CARLSBAD ENERGY CENTER	W O
APPD		Warehouse and Bioswale	SCALE NONE PLOT SCALE 1=1
AUTOCAD FILE NAME CEC OUTLINE rev P			SHEET 2 REV
POWAS EQUIP. NO. ____ - ____ - ____			DWG No CEC01 P

Site Name: CARLSBAD ENERGY CENTER LLC

Site Address: 4950 Avenida Encinas, Carlsbad CA 92008

Date:3/15/2024



REVISIONS						
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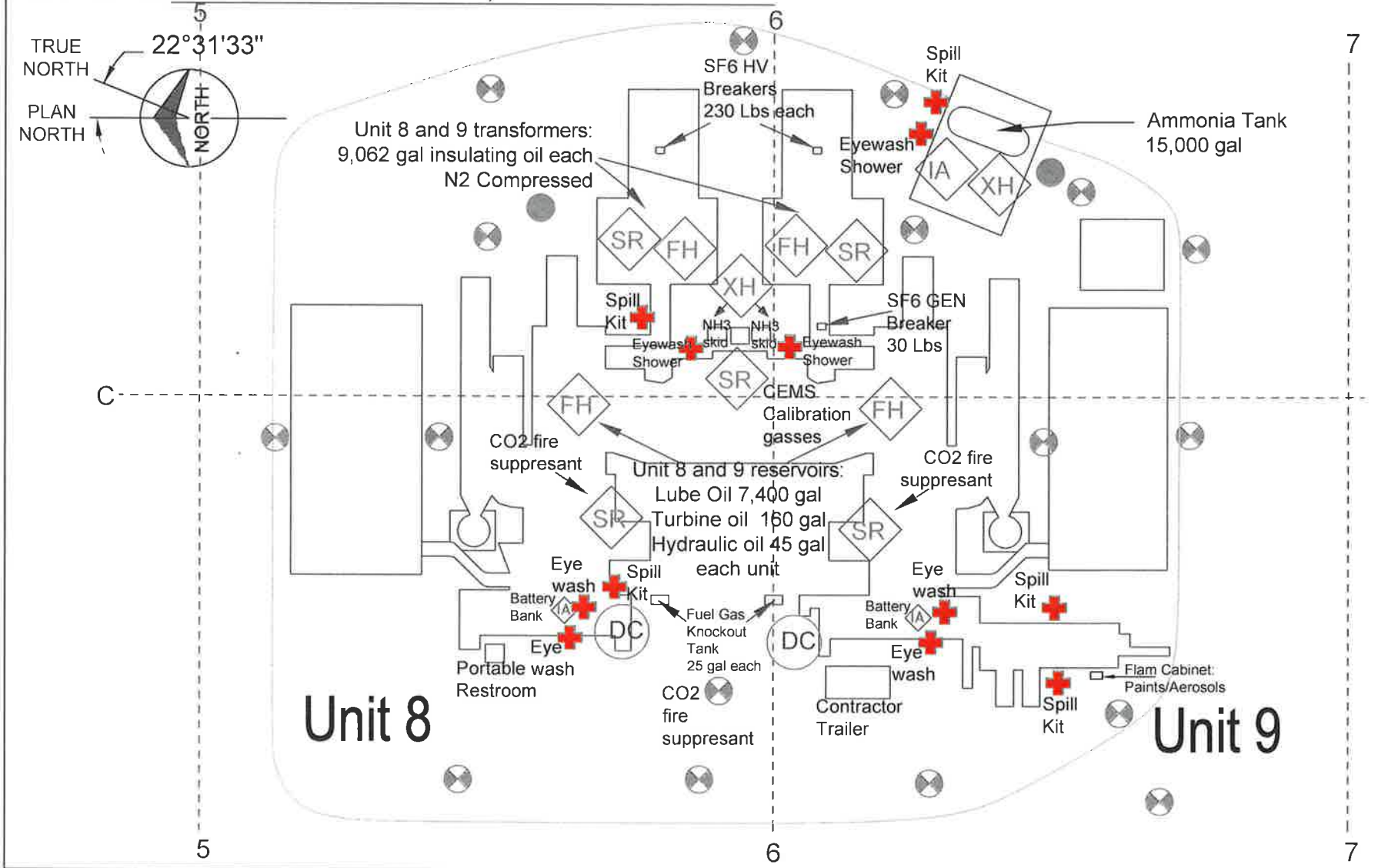
AUTOCAD VERSION 2024	DATE		REF PROJECT No NA
DWN PH	10/17/2018		PROJECT No NA
CHK'D RG		FACILITY CARLSBAD ENERGY CENTER	W O
APP'D		Units 6 and 7	SCALE NONE PLOT SCALE 1=1
AUTOCAD FILE NAME CEC OUTLINE rev P			SHEET 3 REV
POWAYS EQUIP. NO ____ - ____ - ____			DWG No CEC01 P

Site Name: CARLSBAD ENERGY CENTER LLC

Site Address: 4950 Avenida Encinas, Carlsbad CA 92008

Date:3/15/2024



REVISIONS						
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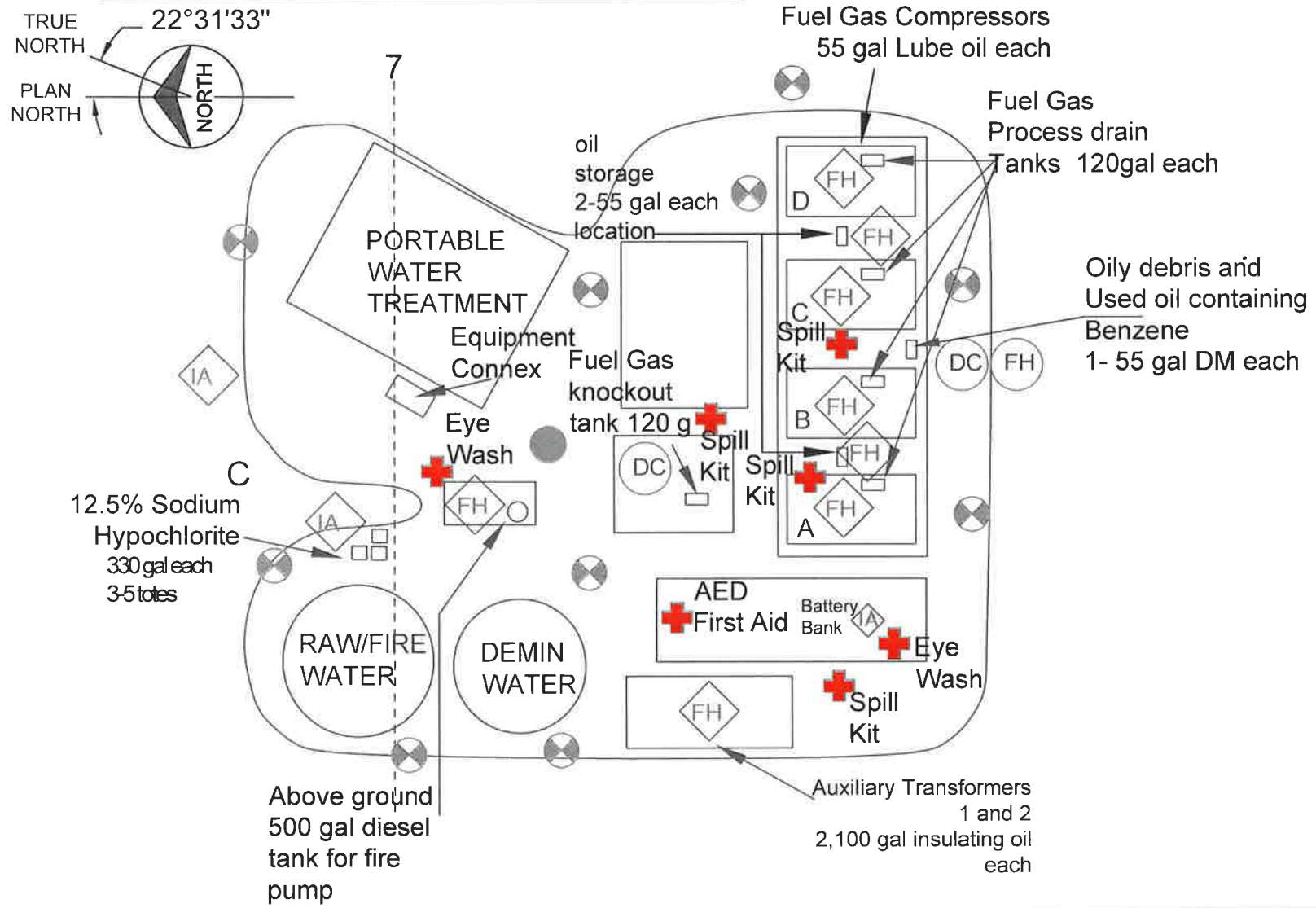
AUTOCAD VERSION	2024
DATE	10/17/2018
DWN	PH
CHK'D	RG
APPD	
AUTOCAD FILE NAME	CEC OUTLINE rev P
PG&E EQUIP. NO.	____ - ____ - ____
FACILITY	CARLSBAD ENERGY CENTER
	Units 8 and 9
REF PROJECT No	NA
PROJECT No	NA
W.O.	
SCALE	NONE
PLOT SCALE	1=1
SHEET	4
REV	
DWG No	CEC01
REV	P

Site Name: CARLSBAD ENERGY CENTER LLC

Site Address: 4950 Avenida Encinas, Carlsbad CA 92008

Date:3/15/2024



REVISIONS

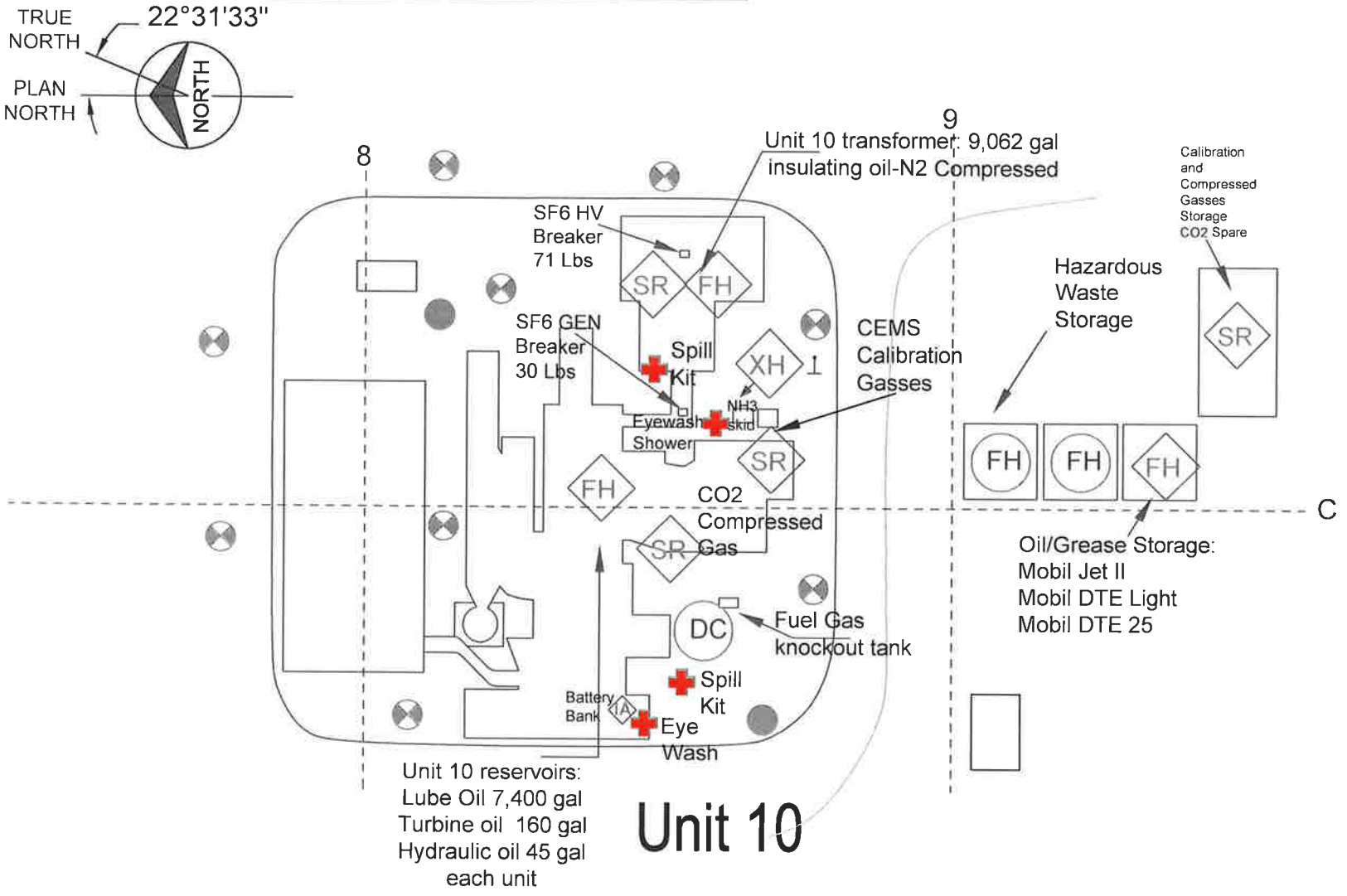
	H	J	K	L	M	N	P
	Update	Update	Update				
	Added waste in FGC 'C' Removed Old control house Added simple Green Added SF6	Added one (1) haz storage connex	Removed Acetylene from page 8 Some symbols enlarged and moved for easier reading Waste moved outside FGC 'C'	Moving diesel gen on page 2 Adding Diesel fueling station. to page 2	Moved Cornfield to N wall of warehouses. Removing Spectrus NX 1100 Constant 6000 moved to warehouse Gasoline pump and generator moved 30 feet west.	Removed flam. cabinet with ventilizer on page 2 Added flammable cabinet on page 3 with Miscellaneous aerosols	Added ammonia sold to each unit
DWN	PH 12/27/16	PH 2/16/22	PH 3/4/22	PH 10/24/2022	PH 5/25/23	PH 11/15/23	PH 3/15/2024
CHK'D	TS 12/27/16	PM-TS 2/16/22	TS 3/7/22	RS 10/24/2022	RS 5/25/23	RS 11/15/23	RS 3/18/2024
APPD				PM	PM	PM	PM
APPD							

AUTOCAD VERSION	2024
DATE	10/17/2018
DWN	PH
CHK'D	RG
APPD	
AUTOCAD FILE NAME	CEC OUTLINE rev P
POWAYS EQUIP. NO.	____ - ____ - ____
FACILITY	CARLSBAD ENERGY CENTER
	BOP - Balance of Plant
REF PROJECT No	NA
PROJECT No	NA
WO	
SCALE	NONE
PLOT SCALE	1=1
SHEET	5
REV	
DWG No	CEC01
REV	P

Site Name: CARLSBAD ENERGY CENTER LLC

Site Address: 4950 Avenida Encinas, Carlsbad CA 92008

Date:3/15/2024



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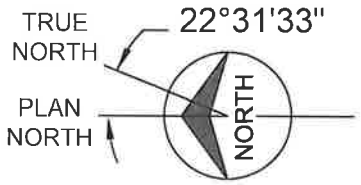
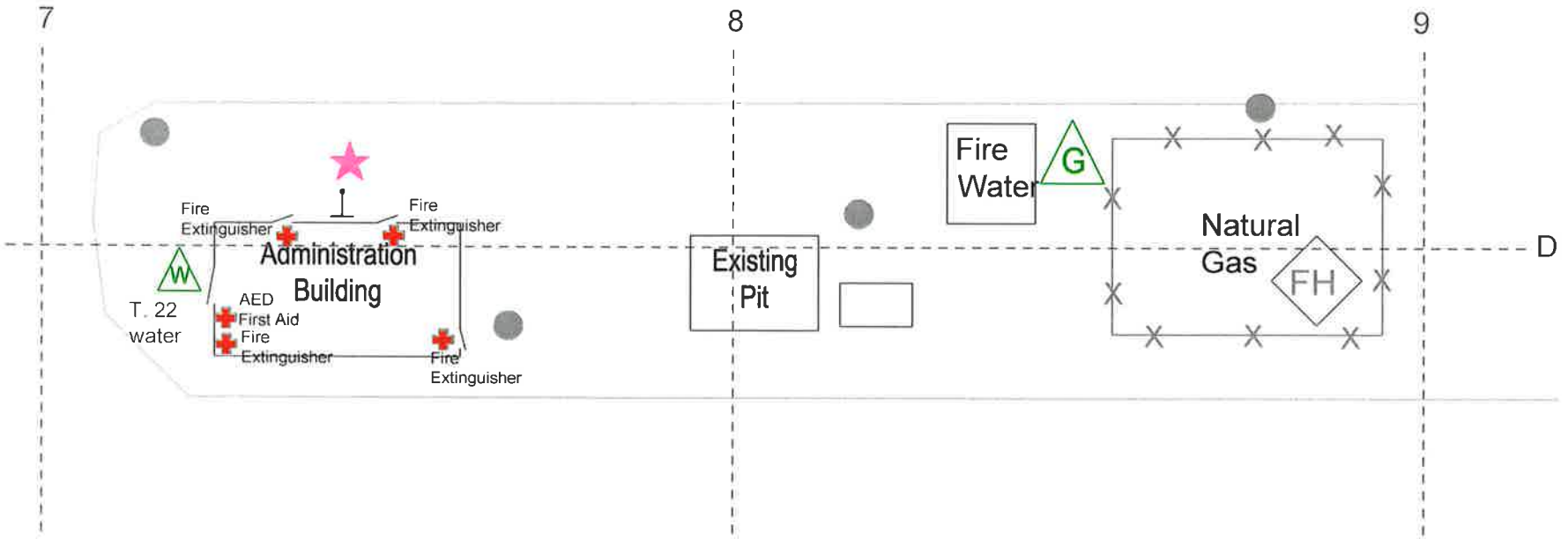
AUTOCAD VERSION 2024	DATE		PROJECT No NA
DWN PH	10/17/2018		PROJECT No NA
CHK'D RG		FACILITY CARLSBAD ENERGY CENTER	W.O
APPD		Unit 10, Hazardous Waste and Hazardous Materials	SCALE NONE PLOT SCALE 1=1
AUTOCAD FILE NAME CEC OUTLINE rev P			SHEET 6 REV
POWMS EQUIP. NO. ___ - ___ - ___			DWG No CEC01 P

Site Name: CARLSBAD ENERGY CENTER LLC

Site Address: 4950 Avenida Encinas, Carlsbad CA 92008

Date:3/15/2024





REVISIONS

H	J	K	L	M	N	P
Update	Update	Update				
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AUTOCAD VERSION 2024	DATE		REF PROJECT No NA
DWN PH	10/17/2018		PROJECT No NA
CHK'D RG		FACILITY CARLSBAD ENERGY CENTER	W.O.
APPD		Administration Building	SCALE NONE PLOT SCALE 1=1
AUTOCAD FILE NAME CEC OUTLINE rev P			SHEET 7 REV
POWERS EQUIP. NO. ____ - ____ - ____			DWG No CEC01 P

	Carlsbad Energy Center Project	
	Procedure Number	**CECP-1201**
	Title	**Emergency Action Plan – Site Specific**
	Revision Date	**March 2025**
Approved:	***Applicable Signatures:***	***Date:***
O & M Supervisor		3/10/25
Plant Manager		3/10/25

The purpose of this procedure is to ensure that Carlsbad Energy Center Project (CECP) emergencies are addressed promptly, minimizing exposure to personnel and property and communicating information in an organized manner that will provide accurate reporting to the appropriate parties.

Table of Contents

Addendums

Emergency Contact List

Carlsbad Energy Center Project

- Facility Name: Carlsbad Energy Center Project
- Owner: Carlsbad Energy Center LLC
- Physical Address of the Facility: 4950 Avenida Encinas, Carlsbad, CA 92008
- Other Identifying Information:

Project Name:	Carlsbad Energy Center ("CECP")
Project Address:	4950 Avenida Encinas, Carlsbad, CA 92008
SDG&E SC ID:	SDG3
CAISO Resource Name:	Carlsbad Energy Center
CAISO Resource ID Unit 1:	CARLS1_2_CARCT1
CAISO Resource ID Unit 2:	CARLS2_1_CARCT1
Project Nominal Capacity:	500 MW

Carlsbad Energy Center

Name	**Work Phone No.**
24-hour Control Room	760.710.3950 Control Room
CECP Business Phone	760.710.3970 Office
Paul Mattesich Plant Manager	760.710.3945 Office 805.616.5836 Cell
Operations and Maintenance Supervisor	
Ryan Stewart Environmental Health and Safety Specialist NRG Regional Environmental (Back-Up): George Piantka	860.995.5507 Cell 760.707.6833 Cell

NRG-related

Name	**Title**	**Office Phone Number**	**Mobile Number**	**Email Address**
SDGE Real-Time Desk	Transaction Scheduler	858-650-6160		tsched1@semprautilities.com
Aaron Malady	Corporate Security	713-537-2730		Aaron.malady@nrg.com
Ann Duhon (Primary Spokesman)	Manager, Communications	713-562-8817		Ann.Duhan@nrg.com
Dan Maul	Energy Services Safety Manager		815-671-1064	daniel.maul@nrg.com

Name	Title	Office Phone Number	Mobile Number	Email Address
NERC/CIP Duty		713-537-5900 267-735-9621		
George Piantka	Environmental Director		760-707-6833	George.Piantka@nrg.com
Tim Sisk	Regional Environmental Manager	760-930-1507	860-334-8081	Tim.Sisk@nrg.com
Core Injury Management	All employee injuries	855-723-3674		

Emergency Contact Numbers

Agency	When	Phone number
Carlsbad Fire Department	24 Hour emergency Non-Emergency	911 858-756-3006
San Diego Hazmat	24 Hour emergency	911
Police	24 hr. emergency Non-Emergency	911 760-931-2197
San Diego County Department of Environmental Health and Quality (CUPA)– Hazardous Materials Division	Any significant release or threatened release of a hazardous material requires immediate reporting to CUPA.	858-505-6657
California Office of Emergency Services (O.E.S.) State Warning Center	Any significant release or threatened release of a hazardous material requires immediate reporting to OES.	800-852-7550 916-262-2155
National Response Center	Release exceeding reportable quantity (RQ).	800-424-8802
Chemical Safety and Hazard Investigation Board (CSB)	Report any releases that result in fatality, serious injury, or property damage of at least $1,000,000.	202-261-7600 (or report@csb.gov)
Division of Occupational Safety & Health (DOSH)	Incident involving serious injury, illness, or death	626-239-0369
Federal Bureau of Investigation (FBI) – Los Angeles Office	Terrorist attack, bomb threat, significant sabotage and active shooter situations	310-477-6565
U.S. Coast Guard	Spill to Waterway (Into Storm Drains)	619-278-7033
San Diego Regional Water Quality Control Board	Spill to Waterway (Into Storm Drains)	619 516-1990
San Diego Air Pollution Control District (SDAPCD)	Emissions Exceedance. *If due to equipment breakdown call within 1 hour of discovery and choose option 2*	858-586-2650. After hours select option 2 on

		SDAPCD phone system
San Diego County Government – Info line	Business related	858-694-3900
California Department of Toxic Substance Control	Improper disposal of hazardous substance	800-728-6942
Poison Control Center	Incidents of ingestion of chemical or medications.	800-222-1222
CA Department of Fish and Wildlife	Incidents that threaten endangered species or migratory birds. *Not in the event of a spill as they are notified by OES.*	858-467-4201 Main office: 0800-1630
SDGE Operations Desk	When SDGE Realtime Desk is not available	858-650-6160
SDGE Outage Desk	To schedule an outage	858-650-6160
CAISO Gen Desk		916-351-2488 916-351-2489
CAISO RIG Engineer	RIG Issues	916-608-5826 916-241-7004
SDGE Day Ahead Scheduler	When substation switching is needed	858-650-6160 – 24 Hour
Carlsbad Municipal Water District	Any issues with water supply	442-339-2722 760-931-2197 After hours
SDG&E	Natural Gas Related Issues *i.e. Leak or Release*	1-800-411-7343
California Public Utilities Commission (CPUC)	Natural Gas Pipeline Release Emergency *Call SDG&E Gas first*	800-235-1076
California Energy Commission	Report Emergencies When it is safe to do so. Anwar Ali Compliance Project Manager	916-698-7498
California Public Utilities Commission	Report Injuries within 24 hours	1-415-355-5503 or Online submittal

Resources

Agency	When	Phone number
American Integrated Services	24 Hour Spill Clean Up/Removal Message Center	888-423-6060 Emergency 310-522-1168 Normal Hours
Cal OES HazMat Section	Assistance deciding how to respond to a spill	916-845-8510
CHEMTREC	24 Hour Chemical information	800-424-9300
National Weather Service	Weather information – Oxnard Forecast Office	805-988-6610
Fire Department	Non-Emergency	858-756-3006
Police Department	Non-Emergency Business	760-931-2197 760-931-2100

Community Notifications

Company	Distance / Direction	Phone Numbers
West Properties (West Inn)	South of CECP	760-448-4501 M: 858-336-9095
SDGE Switchyard Facility Manager (Kyle Bakewell, Shayne Ferber backup)	South of CECP	858-613-3004 858-312-0661 sferber@sdge.com
Poseidon	West of CECP	760-795-3550
EWA Lift Station	North of CECP	760-438-3941

COMMUNICATION CENTERS AND EMERGENCY SYSTEMS

I. Emergency Communications Centers

A. The primary emergency communications center: Control Room

Outside phone (760) 710-3950

B. Emergency Notification System:

Two-way Radio System

II. Emergency Activity Documentation

All plant activities taken during emergencies will be recorded in chronological order, including equipment problems, personnel injuries, and updates on station status and generation availability.

III. Emergency Systems

A. In an emergency situation, a senior CECP Manager will take the Incident Commander (IC) role to manage the incident.

B. If an agency responds to the station, such as fire or police department(s), the agency personnel will take over the IC role from the CECP Manager. The CECP Manager should remain with the agency IC to provide any advice re: the plant equipment or systems.

C. All personnel shall cooperate with emergency responders for life flight operations, securing appropriate landing under the direction of the responding agency.

D. Windsocks - shall be monitored during evacuation periods

E. CECP has three designated safe assembly areas. If in case of severe ammonia leak, evacuate to the tertiary assembly area.

1. Primary Assembly Area: Just outside the administration building in the parking lot on the east side of the building. If workers are in the warehouse the assemble area is in the parking lot on the south side of the warehouse building.

2. Secondary Assembly Area: Just outside of the main gate at the south end of the facility.

3. Tertiary Assembly Area: Evacuate all the way to the south end of the SDG&E substation, outside the substation gate on Avenida Encinas.

4. If in case of a severe ammonia-leaking incident occurs when only a few personnel are in the plant, personnel will

close all doors and shut off the Air Conditioning and ventilation to prevent ammonia vapors from entering the Control Room. Call 911 to notify the Fire Department Hazardous Material Team. Workers will then evacuate the site to the offsite muster area.

F. If applicable, refer to the Business Emergency/Contingency plan (on file with the San Diego County Department of Environmental Health Department Hazmat Division (CUPA). A copy is located in the Control Room.

G. Emergency evacuation

1. In the event a helicopter is needed, landing area is at the emergency responder's discretion. The heliport at Encina Power Station is not available due to demolition activities.

2. The leaders during an evacuation are:

Senior Staff Member.

Visitors – Designated Station Contact.

H. First Aid supplies are available in the Control Room.

I. All workers will be awareness trained on CPR, First Aid and AED use. Workers will maintain current certifications as required, pending contractor availability and access.

J. Incipient fire-fighting training shall be given to station employees. Fire equipment is to be inspected monthly.

K. Emergency supplies consist of our private potable water system, bottled water, and food rations. The water system should remain intact during a major earthquake and if the power lines are down with no auxiliary power to the station, a three day supply of emergency water and food rations is available. Note: All perishable food on site should be consumed first.

PERSONNEL EVACUATION

Important Contact List (for more – see Emergency Contact List)

Where to call	Phone number	Person making the call
Emergency & Ambulance	911	Operating Authority
CECP Management	See the Emergency Contact List	Operating Authority
SDGE Real-Time Desk - if operation of the unit(s) is affected.	(858) 650-6160	Operating Authority
VP, Regional Plant Operations (John Robertson) – for significant damages	(302) 381-6332 Cell	CECP Manager
Corporate Security (Aaron Malady) – for any significant security emergencies	(713) 537-2730	CECP Manager
NRG Spokesman: Communications Manager (Ann Duhan) – for requests from the media about the situation	(713) 562-8817	CECP Manager
California Energy Commission: Anwar Ali	916-698-7498	CECP Environmental Manager

I. Activation

When an evacuation is appropriate:

The Operating Authority will activate the emergency notification system via the plant paging system by paging the following message 3 times over the two-way radio system and the PA system. The message can be followed with more detailed information if required.

"ATTENTION ALL PERSONNEL! THIS IS AN EMERGENCY. EVACUATE TO THE (primary, secondary or tertiary) ASSEMBLY AREA"

A. All personnel who are not operating critical areas of the plant are expected to report to the assembly area. Essential personnel shall be under direction of the Operating Authority and will remain on duty unless it is unsafe to do so.

B. Control Room will provide emergency information to the Evacuation Leader at the evacuation assembly area.

C. Evacuation Leader shall provide assistance with escape. The leaders are:

1. Evacuation area – Senior Staff Member
2. Control Rooms – On duty Operating Authority

3. Visitors – Designated Station Contact

D. CECP has three designated safe assembly areas. If in case of severe ammonia leak, evacuate to the tertiary assembly area.

1. Primary Assembly Area: Just outside the administration building in the parking lot on the east side of the building. If workers are in the warehouse the assemble area is in the parking lot on the south side of the warehouse building.
2. Secondary Assembly Area: Just outside of the main gate at the south end of the facility.
3. Tertiary Assembly Area: Evacuate all the way to the south end of the SDG&E substation, outside the substation gate on Avenida Encinas.

4. If in case of a severe ammonia-leaking incident occurs when only a few personnel are in the plant, personnel can stay in the Control Room instead of evacuating to an evacuation area. Ensure to close all doors and shut off the Air Conditioning and ventilation to prevent ammonia vapors from entering the Control Room. Call 911 to notify the Fire Department Hazardous Material Team.

E. Evacuation Leaders will determine which assembly area can be safely accessed and direct affected personnel to that safe assembly area. Upon arrival at the safe assembly area, personnel will be accounted for. Employees interacting with visitors, vendors, or contract personnel, at the time of evacuation notice will be required to account for their presence. A list of those not accounted for will be forwarded to the Control Room.

F. Site management, as feasible, will initiate search and rescue efforts. Personnel shall remain in safe assembly area until provided further instructions.

G. In the event either Control Room is unsafe to occupy, the operator will attempt to trip any running units and report to a safe area communicating via portable radio.

II. Drills

Conduct a drill on the evacuation process every 12 months.

MEDICAL EMERGENCIES

Important Contact List (for more – see Emergency Contact List)

Where to call	Phone number	Person making the call
Emergency & Ambulance	911	Operating Authority
CECP Management	See the Emergency Contact List	Operating Authority
VP, Regional Plant Operations (John Robertson) – for injuries	(302) 381-6332 Cell	CECP Manager
SDGE Real-Time Desk - if operation of the unit(s) is affected.	(858) 650-6160	Operating Authority
NRG Spokesman: Communications Manager (Ann Duhan) – for requests from the media about the situation	(713) 562-8817	CECP Manager
Director, Operational Safety (Michael Hagenmayer) - This person will notify Cal/OSHA, if applicable	(315) 349-2329 Office (202) 213-9109 Cell	Safety Specialist
Division of Occupational Safety & Health (Cal/OSHA) – for serious employee injuries or fatalities	(626) 239-0369	Regional Safety Manager
Core Injury Management - All employee injuries	(855) 723-3674	Injured employee's supervisor, designee or Safety Specialist
California Energy Commission Anwar Ali	916-698-7498	Only for worker injuries that require offsite medical attention.
California Public Utilities Commission	(415) 355-5503	Only for worker injuries that require offsite medical attention.

I. Discovery.

The person who discovers an accident/injury shall immediately inform the Control Room with the following information and then ensure that proper basic first aid is provided until help arrives.

A. Discoverer's name and location.

B. Exact location of accident/injury.

C. Name, approximate age and any known medical conditions of injured person(s).

D. Nature and severity of accident/injury.

E. Any apparent conditions or hazards that could increase the level of danger (i.e., chemicals, falling hazards, space confinements) in the area of the accident.

F. Description of any action being taken or about to be taken.

II. Notifications.

Upon notification of a medical emergency, the Operating Authority (person receiving the emergency call) shall:

A. Gather information from the person reporting the emergency. Use Emergency Response Information Form (Addendum 1).

B. Notify the appropriate outside agencies, call 911. Report the number of injured personnel, severity and type of injuries.

C. Follow the Safety and Health Incident Notification instructions (Addendum 2).

D. Notify Core Injury Management

E. Notify the Safety Specialist and the available CECP Manager.

F. Notify SDGE Real-Time Desk - if operation of the unit(s) is affected.

III. Assess Plant Status.

A. Number of injured (employees and non-employees)

B. Nature and severity of injuries (include fatalities)

C. Effect on station generation

D. Corrective action initiated

E. Situation stable or unstable

IV. Outside Emergency Assistance.

Give specific direction to outside agencies on route to the station (assign someone at the main gate to direct emergency vehicles entering the site.)

V. Account for all Personnel.

A. The Operating Authority will account for all personnel on site.

B. If a major disaster occurred and the plant was not evacuated, a senior staff shall account for his personnel and report the results

to the Control Room. Designated Station Contacts shall account for any contractors, visitors, delivery persons, vendors, etc. who are not part of the resident work force.

Note: If the incident necessitates the evacuation of a building, personnel shall report to the evacuation assembly area shown on the station map. (Addendum 4)

VI. Determine if Hazardous Chemicals are involved.

A. De-contaminate affected person(s) as needed.

B. Review the Safety Data Sheets (SDSs) for chemical hazards, i.e. flashpoint, extinguishing agent, health hazard, first aid, etc.

C. Furnish outside agencies SDSs. This includes fire department, paramedics and hospital.

VII. Determine Corrective Action as Needed.

VIII. First Aid Supplies.

The first aid supplies and AED are located in the Control Room.

IX. Control Panic and Confusion.

A. Remain Calm - reassure others

B. Update personnel on station status

C. Give specific job assignments

D. Remove non-essential personnel from the affected area

E. If a supervisor is not available, the Operating Authority will assume his responsibilities

F. All employees remain on the job unless directed otherwise.

X. Reassess the Situation (Equipment and Personnel Status). Forward this updated report to the Plant Management or his designee.

XI. Organize Team to Contain the Situation.

A. Evaluate problems associated with online units and units removed from service.

B. Identify and Isolate dangerous areas

C. Secure plant perimeters, direct traffic, document all personnel entering and leaving station and limit access to authorized personnel only.

D. If capable to do so, repair damaged equipment.

XII. Call out Additional Personnel As needed.

XIII. Establish an Emergency Communication Center (if necessary) at the Control Room. Plant activities during an emergency will be recorded in chronological order in the emergency communication center.

XIV. Media reporting

To ensure consistency in the release of information, a single NRG corporate spokesperson will handle interface with news media. Any inquiries relating to the incident will be directed to this person. The media will not be allowed in the plant.

XV. Establish On-Site Teams for Around the Clock Coverage (if-required)

During the crisis, management personnel will supervise and coordinate around-the-clock teams through the unstable and transition periods. This surveillance will continue until conditions stabilize and there is no further danger to personnel and equipment.

FIRE EMERGENCIES

Important Contact List (for more – see Emergency Contact List)

Where to call	Phone number	Person making the call
Emergency & Ambulance	911	Operating Authority
CECP Management	See the Emergency Contact List	Operating Authority
SDGE Real-Time Desk - if operation of the unit(s) is affected.	(858) 650-6160	Operating Authority
VP, Regional Plant Operations (John Robertson) – if large fires occurred	(302) 381-6332 Cell	CECP Manager
NRG Spokesman: Communications Manager (Ann Duhan) – for requests from the media about the situation	(713) 562-8817	CECP Manager
California Energy Commission Anwar Ali	916-698-7498	CECP Environmental Manager

I. Discovery

The person who discovers a fire shall immediately inform the Control Room with the following information. The person receiving the information should use the Emergency Response Information Form (Addendum 1) for this purpose.

A. Discoverer's name and location.

B. Exact location of the fire.

C. Size and type of fire (Class A, B or C)

D. Report number and type of injuries if any.

E. Any apparent conditions or hazards that could increase the level of danger (i.e., chemicals, flammable liquids or gases) in the area of the fire.

F. Description of any action being taken or about to be taken. The caller should begin fighting the incipient level fire if trained. (Do not attempt to extinguish the fire alone unless you are sure it can be done safely).

II. Notification

If the fire is in its incipient stage and is in the process of being extinguished, the Operating Authority (person receiving the emergency call) shall send all available support to the incident location. Fire

extinguisher hands-on training shall be provided to applicable station employees annually.

If the fire has progressed beyond the incipient stage or there are hazards near the fire which could quickly elevate the danger, the Control Room shall:

A. Activate the emergency notification system for fire (two-way radio system and PA).

B. Notify the appropriate outside agencies including calling 911.

1. Magnitude and type of fire.
2. Type of fuel or chemicals involved.
3. Number of personnel injured.
4. Plant location and accessibility to the affected area.
5. Information on station firefighting equipment.

C. Notify SDGE Real-Time Desk, if operation of the unit(s) is affected.

D. Follow the Safety and Health Incident Notification Instructions (Addendum 2)

E. Notify the Plant Management

III. Outside Emergency Assistance

A. Give specific direction to outside agencies in route to the station.

B. Assign someone to the main gate to direct emergency vehicles entering the site.

C. Provide an update to the fire department personnel of the incident and situation

IV. Account for all Personnel

The Operating Authority will account for all personnel on site.

If a major disaster occurred and the plant was not evacuated, supervisors shall account for their personnel and report the results to the Control Room. Designated Station Contacts shall account for any contractors, visitors, delivery persons, vendors, etc. who are not part of the resident work force.

Note: If the incident necessitates the evacuation of a building, personnel shall report to their designated evacuation assembly area shown on the station maps (Addendum 4).

V. Determine Corrective Actions

A. Identify and isolate sources of danger or fuel sources feeding the fire.

B. Evaluate problems associated with online units and off line units.

C. Shut off fuel sources. Secure pumps, isolation valves, etc.

D. Shut off any potential ignition sources such as motors, electrical circuits, open flames, etc.

E. De-energize electrical equipment in or near the fire area.

F. If the CO_2 system can extinguish the fire in the area, manually activate CO_2, if it did not take place automatically.

G. Monitor fire's progress.

H. Check the fire pump status and raw water tank level.

I. If Hazardous Chemicals are involved, barricade the area and follow the Hazardous Material Spill Procedure.

1. Barricade the affected area.
2. Review the Safety Data Sheets (SDSs) for chemical hazards, i.e. flashpoint, extinguishing agent, health hazard, first aid, etc.
3. Furnish outside agencies SDSs information. This includes fire department, paramedics and hospital.

VI. Control Panic and Confusion

A. Remain calm, reassure others.

B. Give specific job assignments.

C. Remove non-essential personnel from the affected area.

D. If a supervisor is not available, the Operating Authority will assume the responsibilities.

VII. Assess Plant Status

A. Number of personnel injured, if any.

B. Nature and severity of injuries (include fatalities)

C. Effect on station generation

D. Corrective action initiated

E. Situation stable or unstable

VIII. First Aid Supplies

The first aid supplies, burn kit, and AED area located in the Control Room.

IX. Organize Teams to Contain the Station

A. Evaluate problems associated with online units and units removed from service.

B. Identify and Isolate dangerous areas

C. Secure plant perimeters, direct traffic, document all personnel entering and leaving station and limit access to authorized personnel only.

D. Repair the damaged equipment.

X. Establish an Emergency Communication Center (if necessary) at the Control Room. Plant activities during an emergency will be recorded in chronological order in the emergency communication center.

XI. Media Reporting

To ensure consistency in the release of information, a single NRG corporate spokesperson will handle interface with news media. Any inquiries relating to the incident will be directed to this person. The media will not be allowed in the plant.

HAZARDOUS MATERIAL SPILLS

Important Contact List (for more – see Emergency Contact List)

Where to call	Phone number	Person to make call
Medical emergency and ambulance	911	Operating Authority
CECP Management	See the Emergency Contact List	Operating Authority
SDGE Real-Time Desk – if operation of the unit(s) is affected.	858-650-6160	Operating Authority
NRG Spokesman: Manager, Communications (Ann Duhan) – for requests from the media/public about the situation	713-562-8817	Plant Management
San Diego County Department of Environmental Health Hazmat Division (CUPA)	858-505-6657	Environmental Specialist
California Office of Emergency Services (O.E.S.)	800-852-7550 916-262-2155	Environmental Specialist
National Response Center	800-424-8802	Environmental Specialist
Chemical Safety and Hazard Investigation Board (CSB)	202-261-7600 (or report@csb.gov)	Environmental Specialist
California Energy Commission Anwar Ali	916-698-7498	Environmental Specialist
Department of Toxic Substances Control	800-728-6942	Environmental Specialist
San Diego Water Quality Control Board	619-516-1990	Environmental Specialist
US Coast Guard	619-278-7033	Environmental Specialist
SDG&E (gas service/leak)	1-800-411-7343	Environmental Specialist
California Public Utilities Commission	800-235-1076	Environmental Specialist
American integrated Services- 24 Hour Spill Clean Up/Removal	888-423-6060 310-522-1168	Environmental Specialist
Global Infrastructure Partners – Michael O'Toole	312-835-8527	Environmental Specialist

I. This procedure is designed to be used in conjunction with the "Risk Management Plan", "Spill Prevention, Control and Countermeasure Plan", "Hazardous Material Business Plan", Security Plan, and "Waste Management and Minimization Plan."

II. Discovery

All hazardous material spills are to be reported to the Control Room. The person who discovers a hazardous material release shall immediately inform the Operating Authority through radio or phone and report the following information:

A. Exact location, time, duration, quantity (estimated), all known substances involved in the Release, level of containment, media into which the release occurred, proximity of storm drains and any other items of significance that can be ascertained in a few seconds.

B. Names of personnel exposed to or potentially injured by hazardous material.

C. Any apparent conditions or hazard, which could increase the level of danger/exposure in the area of the hazardous material release.

III. Notification

A. The Operating Authority shall assess the severity of the material release, the appropriate responding method for the situation, and shall determine at that point if 911 should be called.

B. If a health hazard exists, notify station personnel of the incident over the public address system and/or implement the Personnel Evacuation Procedure outlined in this Emergency Action Plan.

C. After the situation is assessed and/or emergency notification of 911 is made, then notify the O&M Supervisor. After the O&M Supervisor provides the Plant with necessary operational instructions, the O&M Supervisor will contact the CECP Environmental Specialist who will make any necessary internal and external agency notifications (in accordance with section VI of this procedure) and arrange for clean-up if necessary. CECP EH&S Specialist is unavailable, contact NRG regional environmental support (see emergency contact list) for assistance immediately.

The following information should be relayed: Exact location, time, duration, quantity, all known substances involved in the release, level of containment, media into which the release occurred, proximity of storm drains and any other items of significance that can be ascertained in a few seconds. The O&M Supervisor will also notify the Plant Manager.

D. If in case of a severe ammonia-leaking incident occurs when only a few personnel are in the plant, personnel will close all doors and shut off the Air Conditioning and ventilation to prevent ammonia vapors from entering the Control Room. Workers will

call 911 to notify the Fire Department Hazardous Material Team. Worker will evacuate to the offsite muster area.

IV. Assessment and response to a hazardous material leak

A. Types of leaks:

1. For a release from a drum, tote, or tank and if the leak is minor, make an attempt to stop the leak if it can be done safely. If the leak is downstream of a block valve and the valve can be safely shut, shut it off and barricade the leak. **Do not attempt to plug or stop any chemical leaking from a tank or line other than attempting to quickly stop it by closing a block valve located upstream of the leak.** Barricade a perimeter a safe distance from the leak and stay away. Call 911 to ask for assistance with the leak.

2. Releases of bulk storage chemicals (i.e. ammonia, sulfuric acid, sodium hypochlorite)

i. If the release cannot be stopped or is likely to breach the secondary containment, call 911 immediately to report the spill to the Carlsbad Fire Department.

ii. If the storage tank has a leak, call in a vacuum or tank truck, as required, to allow the storage tank to be drained and flushed prior to repair. Dispose of all Hazardous Waste to an approved waste disposal site.

iii. If the chemical is leaking from the piping system, close the tank discharge valve and stop all feed equipment.

iv. For a release during offloading operations immediately shut off the **chemical supply from tanker (i.e., close dispenser; isolate supply hose).**

B. If the hazardous material leaking is ammonia and personnel can smell ammonia, barricade to isolate the area and stay upwind.

C. Spill kits for ammonia are located at each power block and the ammonia offloading area. Ammonia spill kits consist of absorbent spill pads (hydrophilic) and a chemical compatible container. DO NOT DILUTE spills. Any ammonia or ammonia cleanup materials must be placed in a waste compatible container and placed in the hazardous waste accumulation area onsite depending disposal.

D. For all operations that are to be performed, personnel must wear proper personal protective equipment (PPE), including a respirator with appropriate filter cartridges.

E. Allow only authorized persons wearing appropriate PPE in the affected area.

F. Review Safety Data Sheets (formerly MSDSs) for the characteristics of the leaking substance. Provide the information to the outside agencies when they are notified.

G. For oil leaks, follow the SPCC procedure.

H. If leak is discovered at the Hazardous Waste Accumulation Area, remediate the situation using appropriate oil or chemical spill kit. Notify the Environmental Specialist as soon as possible. (See attached locations of spill clean-up equipment)

I. Hazardous material spill clean-up is to be done by a contractor except any spill that is of low hazard or that is considered to be small quantity. Small quantity based on only requires one spill kit to cleanup from within containment and is below reportable quantity (RQ).

J. All spill cleanup wastes must be stored and disposed of in accordance with the facility waste management plan.

V. Establish a communication center (if required)

A. In the event of calling 911, secure the plant perimeter.

B. All plant activities will be recorded in chronological order in the CECP Logbook, including but not limited to equipment problems, personnel injuries, environmental impact and notifications and updates on station status and generation availability.

VI. Regulatory Notifications & Reporting

The Environmental Specialist will make all notifications to regulatory agencies. If unable to reach the Environmental Specialist, the Plant Manager or NRG Regional Environmental Support contact (see Emergency Contacts) will make the following notifications:

Verbal Notifications					
Agency	**Circumstances**	**When to Report**	**What to Report**	**Phone**	**Citation**
911	Imminent threat to public health	Immediately	Detailed information about spill and any injuries or safety incidents involved.	911	-

San Diego County Department of Environmental Health Hazmat Division (CUPA)	Any release of oil, hazardous material or waste (including any reported to the NRC or OES) to the environment.	Immediately	Spill information and any other details requested.	858-505-6657	23 CCR 2650-2652; 19 CCR 2701-2705
Agency	**Circumstances**	**When to Report**	**What to Report**	**Phone**	**Citation**
California Office of Emergency Services (Cal OES)	A significant release or threatened release of oil, hazardous materials or hazardous waste, or sewage including fire or explosions which could threaten human health, or the environment. All releases of 42 gallons or more from a tank. All hazardous liquid pipeline releases.	Immediately	1. The exact location of the release or threatened release; 2. The name of the person reporting the release or threatened release; 3. The hazardous materials involved in the release or threatened release; 4. An estimate of the quantity of hazardous materials involved; and 5. If known, the potential hazards presented by the hazardous material involved in the release or threatened release;	800-852-7550 or 916-845-8911	19 CCR 2703 - 2705; 23 CCR 2250-1, 2260; HSC 25501 (o), (p)
National Response Center (NRC)	All releases of oil or hazardous materials equal or exceeding the reportable quantity and any releases of oil or hazardous materials to water (i.e. to our Storm Drains).	Immediately	1. The chemical name or identity of any substance involved in the release. 2. An indication of whether the substance is an extremely hazardous substance. 3. An estimate of the quantity of any such substance that was released into the environment. 4. The time and duration of the release. 5. The medium or media into which the release occurred. 6. Any known or anticipated acute or chronic health risks associated with the emergency and, where appropriate, advice regarding medical attention necessary for exposed individuals. 7. Proper precautions to take as a result of the release, including evacuation (unless such information is readily available to the community emergency coordination pursuant to the emergency plan). 8. The names and telephone number of the person or persons to be contacted for further information.	800-424-8802	40 CFR 110.6, 302.4, 355.40
Department of Toxic Substances Control (DTSC)	All hazardous waste tank releases and/or containment systems. (release of Fuel Gas Compressor Drain Tank)	Immediately	Spill information and any other details requested.	800-728-6942	22 CCR 66265.56
US Coast Guard	All releases of oil or hazardous materials/hazardous waste to water (storm drains)	Immediately	Spill information and any other details requested.	619-278-7033	33 CFR 153.201 - 153.203

Regional Water Quality Control Board *(San Diego)*	All releases of oil or hazardous materials/hazardous waste to water (storm drains)	Immediately	Spill information and any other details requested.	619-516-1990	23 CCR 2260 Reporting Requirements
SDG&E Gas	Release of Natural Gas	Immediately	Spill information and any other details requested.	1-800-411-7343	-
California Public Utilities Commission	For release of Natural Gas (call SDG&EGas 1st)	Immediately	Spill information and any other details requested.	800-235-1076	-
California Energy Commission	Report any incident that requires outside agency reporting or response.	As soon as it is safe to report.	1. Health and safety impacts on the surrounding population; 2. Property damage off-site; 3. Response by off-site emergency response agencies; 4. Serious on-site injury; 5. Serious environmental damage; or 6. Emergency reporting to any federal, state, or local agency.	916-698-7498	CEC License COM-13
Global Infrastructure Partners	Report any environmental emergency.	As soon as it is safe to report	Any Environmental Emergency	Michael O'Toole: 312-835-8527	-

Written Follow-Up Reports					
Agency	**Circumstances**	**When to Report**	**What to Report**	**Submit To**	**Citation**
California Office of Emergency Services **(Written Report)**	A significant release or threatened release of oil, hazardous materials or hazardous waste, or sewage including fire or explosions which could threaten human health, or the environment. All releases of 42 gallons or more from a tank. All hazardous liquid pipeline releases.	As soon as practicable following a release, but no later than 30 days from the date of the release.	Emergency Release Follow-up Notice Reporting Form (See addendum 5).	Chemical Emergency Planning and Response Commission (CEPRC) 3650 Schriever Ave, Mather, CA 95655	19 CCR 2705
EPA Region IX	Any discharge of 1,000 gallons or more of oil; or second discharge of 42 gallons or more of oil over a 12-month period.	Written follow-up within 60 days	See form and instructions in SPCC Plan.	See form and instructions in SPCC Plan.	40 CFR 112.4
California Energy Commission	1. Health and safety impacts on the surrounding population; 2. Property damage off-site; 3. Response by off-site emergency response agencies; 4. Serious on-site injury; 5. Serious environmental damage; or 6. Emergency reporting to any federal, state, or local agency.	Written follow-up within 1 week.	See COM-13	CEC CPM	CEC License COM-13

***NOTE:** The timing on verbal notifications is to call "as soon as there is knowledge of any release." The priority is on timeliness. However, a balance must be struck between acting to report and acting to contain and prevent damage. Call in the report as soon as possible and not less than an hour from when the incident occurred.

The report (and any emergency response) cannot be delayed in order to provide the complete information. The report can always be modified at a later date.

VII. Media reporting

To ensure consistency in the release of information, a single NRG corporate spokesperson will handle interface with news media. Any inquiries relating to the incident will be directed to this person. The media will not be allowed in the plant.

VIII. Required Training

A. Spill Prevention Control & Countermeasure (SPCC):

1. Required For: 40 CFR §112.7(f). Oil storage and oil filled equipment. Required and enforced by the EPA. All personnel handling oil or responsible for conducting SPCC inspections must be trained. Appropriate personnel who are responsible for the operation and maintenance of equipment in the effort to prevent oil discharge must also receive training.
2. Frequency: Within 6 months of hire or prior to working with oil or fuel materials unsupervised. Prior to a new assignment or change in operation. Refresher training is required annually.
3. Must Include: Initial training for appropriate personnel covers the operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules and regulations; general facility operations; and the contents of this SPCC Plan.

   Appropriate personnel also receive annual discharge prevention briefings to assure adequate understanding of this SPCC Plan. Such briefings highlight and describe past reportable discharges or failures, malfunctioning components, and any recently developed precautionary measures

B. CalARP RMP (Risk Management Plan)

1. Required For: 19 CCR §2755.4. Aqueous Ammonia 19%. Required by the (California Accidental Release Prevention) Program and enforced by the San Diego County Department of Environmental Health Hazardous Materials Department (CUPA). All personnel involved in operating or maintaining the ammonia process must be trained.
2. Frequency: Before an employee is allowed to operate or maintain covered processes and prior to a change in assignments. Refresher training is required every 3 years.
3. Must Include: Safety information, a Hazard review, Operating procedures, Maintenance requirements, Compliance audits and Training requirements.

C. Hazardous Materials (HMBP) & Hazardous Waste

1. Required For: 19 CCR §2732. Hazardous Materials Business Plan. All personnel must be trained.
2. Frequency: At the time of hire and prior to new assignments or changes in operation. Refresher training is required annually.
3. Must Include: Internal Alarm/Notification, Evacuation/Re-entry Procedure and Assembly Point Locations

   Emergency incident reporting, External Emergency Response Organization Notification, Locations and Contents of Emergency Response/Contingency Plan, Facility Evacuation Drills, Safe Methods for Handling and Storage of Hazardous Materials, Location and Proper Use of Spill Equipment, Spill Procedures/Emergency Procedures, Hazards of Chemicals Exposed to and Hazardous Waste Management.

IX. Definitions

A. Personnel training provided: First Responder, Operations Level (FRO). FRO are individuals who respond to releases or potential releases of hazardous substances as part of the initial response to the site for the purpose of protecting nearby persons, property, or the environment from the effects of the release. They are trained to respond in a defensive fashion without trying to stop the release. Their function is to contain the release from a safe distance, keep it from spreading, and prevent exposures.

B. Hazardous material: Any substance that may result in adverse effects on the health or safety of employees.

C. Discharge: Includes but not limited to, spilling, leaking, pumping, pouring, emitting, emptying, or dumping of material.

X. Spill kit locations – see Addendum 6 (Map of CECP Emergency Equipment Locations)

AMMONIA RELEASE

Important Contact List (for more – see Emergency Contact List)

Where to call	Phone number	Person to make call
Medical emergency and ambulance	911	Operating Authority
CECP Management	See the Emergency Contact List	Operating Authority
SDGE Real-Time Desk – if operation of the unit(s) is affected.	858-650-6160	Operating Authority
NRG Spokesman: Manager, Communications (Ann Duhan) – for requests from the media/public about the situation	713-562-8817	Plant Management
San Diego County Department of Environmental Health Hazmat Division (CUPA)	858-505-6657	Environmental Specialist
California Office of Emergency Services (O.E.S.)	800-852-7550 916-262-2155	Environmental Specialist
National Response Center	800-424-8802	Environmental Specialist
Chemical Safety and Hazard Investigation Board (CSB)	202-261-7600 (or report@csb.gov)	Environmental Specialist
California Energy Commission Anwar Ali	916-698-7498	Environmental Specialist
Department of Toxic Substances Control	800-728-6942	Environmental Specialist
San Diego Water Quality Control Board	619-516-1990	Environmental Specialist
US Coast Guard	619-278-7033	Environmental Specialist
SDG&E (gas service/leak)	1-800-411-7343	Environmental Specialist
California Public Utilities Commission	800-235-1076	Environmental Specialist
American integrated Services- 24 Hour Spill Clean Up/Removal	888-423-6060 310-522-1168	Environmental Specialist
Global Infrastructure Partners – Michael O'Toole	312-835-8527	Environmental Specialist

X. This procedure is designed to be used in conjunction with the "Risk Management Plan", "Spill Prevention, Control and Countermeasure Plan", "Hazardous Material Business Plan", Security Plan, and "Waste Management and Minimization Plan."

XI. Discovery

All ammonia releases are to be reported to the Control Room. The person who discovers a hazardous material release shall immediately inform the Operating Authority through radio or phone and report the following information:

D. Exact location, time, duration, quantity (estimated), level of containment, media into which the release occurred, proximity of storm drains and any other items of significance that can be ascertained in a few seconds. Wind direction should also be noted.

E. Names of personnel exposed to or potentially injured by hazardous material.

F. Any apparent conditions or hazard, which could increase the level of danger/exposure in the area of the hazardous material release.

XII. Notification

E. The Operating Authority shall assess the severity of the material release, the appropriate responding method for the situation, and shall determine at that point if 911 should be called.

F. If a health hazard exists, notify station personnel of the incident over the public address system and/or implement the Personnel Evacuation Procedure outlined in this Emergency Action Plan.

G. After the situation is assessed and/or emergency notification of 911 is made, then notify the O&M Supervisor. After the O&M Supervisor provides the Plant with necessary operational instructions, the O&M Supervisor will contact the CECP Environmental Specialist who will make any necessary internal and external agency notifications (in accordance with section VI of this procedure) and arrange for clean-up if necessary. CECP EH&S Specialist is unavailable, contact NRG regional environmental support (see emergency contact list) for assistance immediately.

The following information should be relayed: Exact location, time, duration, quantity, all known substances involved in the release, level of containment, media into which the release occurred, proximity of storm drains and any other items of significance that can be ascertained in a few seconds. The O&M Supervisor will also notify the Plant Manager.

H. If in case of a severe ammonia-leaking incident occurs when only a few personnel are in the plant, personnel will close all doors and shut off the Air Conditioning and ventilation to prevent ammonia vapors from entering the Control Room. Workers will call 911 to notify the Fire Department Hazardous Material Team. Worker will evacuate to the offsite muster area.

XIII. Assessment and response to a hazardous material leak

K. Types of leaks:

3. For a release from a line or at a skid, make an attempt to stop the leak if it can be done safely. If the leak is downstream of a block valve and the valve can be safely shut, shut it off and barricade the leak. **Do not attempt to plug or stop any chemical leaking from a tank or line other than attempting to quickly stop it by closing a block valve located upstream of the leak.** Barricade a perimeter a safe distance from the leak and stay away. Call 911 to ask for assistance with the leak.

4. Releases of bulk storage ammonia

i. If the release cannot be stopped or is likely to breach the secondary containment, call 911 immediately to report the spill to the Carlsbad Fire Department.

ii. If the storage tank has a leak, call in a vacuum or tank truck, as required, to allow the storage tank to be drained and flushed prior to repair. Dispose of all Hazardous Waste to an approved waste disposal site.

iii. If the chemical is leaking from the piping system, close the tank discharge valve and stop all feed equipment.

iv. For a release during offloading operations immediately shut off the **chemical supply from tanker (i.e., close dispenser; isolate supply hose).**

L. If personnel can smell ammonia, if safe, barricade to isolate the area and stay upwind.

M. Spill kits for ammonia are located at each power block and the ammonia offloading area. Ammonia spill kits consist of absorbent spill pads (hydrophilic) and a chemical compatible container. DO NOT DILUTE spills. Any ammonia or ammonia cleanup materials must be placed in a waste compatible container and placed in the hazardous waste accumulation area onsite depending disposal.

N. For all operations that are to be performed, personnel must wear proper personal protective equipment (PPE), including a respirator with appropriate filter cartridges.

O. Allow only authorized persons wearing appropriate PPE in the affected area.

P. Review Safety Data Sheets (formerly MSDSs) for the characteristics of the leaking substance. Provide the information to the outside agencies when they are notified.

XIV. Establish a communication center (if required)

A. In the event of calling 911, secure the plant perimeter.

C. All plant activities will be recorded in chronological order in the CECP Logbook, including but not limited to equipment problems, personnel injuries, environmental impact and notifications and updates on station status and generation availability.

XV. Operations under state of emergency from ammonia spill

a. Corrective Actions

i. The Operating Authority is to have an Operator(s) to assess the incident scene to determine the situation.

ii. Communicate the findings with the Control Room.

iii. Execute internal corrective measures that have been directed by the Operating Authority such as:

iv. De-energization of electrical systems

v. Shutting down process systems

1. Including isolating ammonia piping using isolation valves.

vi. Removing equipment/system from service

vii. Adjusting station/unit/equipment loading based on the incident

b. Ammonia Event Review

i. All station safety systems must be identified, and a plan developed to restore them to service.

ii. Environmental impact must be determined.

iii. Applicable agencies must be notified.

iv. Fire/Rescue/HazMat equipment must be inventoried and returned to service.

v. Post incident critique must be conducted.

vi. Submit the post review report of the CSF to applicable station and corporate personnel.

c. Starting up after an emergency

i. If the ammonia is system is taken out of service either for the entire plant or one unit is isolated, there are procedural steps

that must be followed before the element/system can be put back into service.

1. The system must be determined to be in normal working condition.
2. Corporate environmental must be involved in the decision.
3. If requested or determined necessary, regulatory agencies will be involved in the change of operational status.

XVI. Regulatory Notifications & Reporting

The Environmental Specialist will make all notifications to regulatory agencies. These notifications are detailed in the Hazardous Materials Spills section VI.

XVII. Media reporting

To ensure consistency in the release of information, a single NRG spokesperson will handle interface with news media. Any inquiries relating to the incident will be directed to this person. The media will not be allowed in the plant.

XVIII. Required Training

The required training is the same as detailed in Hazardous Materials Spills section VIII.

SAFETY DATA SHEET

Aqua Ammonia (5-19.9%)

Airgas
an Air Liquide company

Section 1. Identification

GHS product identifier : Aqua Ammonia (5-19.9%)

Other means of identification : Aqua Ammonia, Ammonium Hydroxide

Product type : Liquid.

Product use : Synthetic/Analytical chemistry.

Synonym : Aqua Ammonia, Ammonium Hydroxide

SDS # : 001196

Supplier's details : Airgas USA, LLC and its affiliates
259 North Radnor-Chester Road
Suite 100
Radnor, PA 19087-5283
1-610-687-5253

24-hour telephone : 1-866-734-3438

Section 2. Hazards identification

OSHA/HCS status : This material is considered hazardous by the OSHA Hazard Communication Standard (29 CFR 1910.1200).

Classification of the substance or mixture : SKIN CORROSION - Category 1B
SPECIFIC TARGET ORGAN TOXICITY (SINGLE EXPOSURE) (Respiratory tract irritation) - Category 3
AQUATIC HAZARD (ACUTE) - Category 1

GHS label elements

Hazard pictograms :

Signal word : Danger

Hazard statements : May displace oxygen and cause rapid suffocation.
Causes severe skin burns and eye damage.
May cause respiratory irritation.
Very toxic to aquatic life.

Precautionary statements

General : Read label before use. Keep out of reach of children. If medical advice is needed, have product container or label at hand.

Prevention : Wear protective gloves. Wear eye or face protection. Wear protective clothing. Use only outdoors or in a well-ventilated area. Avoid release to the environment. Avoid breathing vapor. Wash hands thoroughly after handling.

Response : Collect spillage. IF INHALED: Remove person to fresh air and keep comfortable for breathing. Immediately call a POISON CENTER or physician. IF SWALLOWED: Immediately call a POISON CENTER or physician. Rinse mouth. Do NOT induce vomiting. IF ON SKIN (or hair): Take off immediately all contaminated clothing. Rinse skin with water or shower. Wash contaminated clothing before reuse. Immediately call a POISON CENTER or physician. IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Immediately call a POISON CENTER or physician.

Storage : Store locked up.

Disposal : Dispose of contents and container in accordance with all local, regional, national and international regulations.

Section 2. Hazards identification

Hazards not otherwise classified : None known.

Section 3. Composition/information on ingredients

Substance/mixture : Mixture

Other means of identification : Aqua Ammonia, Ammonium Hydroxide

Product code : 001196

Ingredient name	%	CAS number
Aqua Ammonia	100	1336-21-6
WATER	80.1 - 95	7732-18-5
ammonia	5 - 19.9	7664-41-7

Any concentration shown as a range is to protect confidentiality or is due to batch variation.

There are no additional ingredients present which, within the current knowledge of the supplier and in the concentrations applicable, are classified as hazardous to health or the environment and hence require reporting in this section.

Occupational exposure limits, if available, are listed in Section 8.

Section 4. First aid measures

Description of necessary first aid measures

Eye contact : Get medical attention immediately. Call a poison center or physician. Immediately flush eyes with plenty of water, occasionally lifting the upper and lower eyelids. Check for and remove any contact lenses. Continue to rinse for at least 10 minutes. Chemical burns must be treated promptly by a physician.

Inhalation : Get medical attention immediately. Call a poison center or physician. Remove victim to fresh air and keep at rest in a position comfortable for breathing. If it is suspected that fumes are still present, the rescuer should wear an appropriate mask or self-contained breathing apparatus. If not breathing, if breathing is irregular or if respiratory arrest occurs, provide artificial respiration or oxygen by trained personnel. It may be dangerous to the person providing aid to give mouth-to-mouth resuscitation. If unconscious, place in recovery position and get medical attention immediately. Maintain an open airway. Loosen tight clothing such as a collar, tie, belt or waistband. In case of inhalation of decomposition products in a fire, symptoms may be delayed. The exposed person may need to be kept under medical surveillance for 48 hours.

Skin contact : Get medical attention immediately. Call a poison center or physician. Flush contaminated skin with plenty of water. Remove contaminated clothing and shoes. Wash contaminated clothing thoroughly with water before removing it, or wear gloves. Continue to rinse for at least 10 minutes. Chemical burns must be treated promptly by a physician. Wash clothing before reuse. Clean shoes thoroughly before reuse.

Ingestion : Get medical attention immediately. Call a poison center or physician. Wash out mouth with water. Remove dentures if any. Remove victim to fresh air and keep at rest in a position comfortable for breathing. If material has been swallowed and the exposed person is conscious, give small quantities of water to drink. Stop if the exposed person feels sick as vomiting may be dangerous. Do not induce vomiting unless directed to do so by medical personnel. If vomiting occurs, the head should be kept low so that vomit does not enter the lungs. Chemical burns must be treated promptly by a physician. Never give anything by mouth to an unconscious person. If unconscious, place in recovery position and get medical attention immediately. Maintain an open airway. Loosen tight clothing such as a collar, tie, belt or waistband.

Most important symptoms/effects, acute and delayed

Potential acute health effects

Eye contact : No known significant effects or critical hazards.

Inhalation : May cause respiratory irritation.

Skin contact : Causes severe burns.

Section 4. First aid measures

Frostbite : Try to warm up the frozen tissues and seek medical attention.

Ingestion : No known significant effects or critical hazards.

Over-exposure signs/symptoms

Eye contact : Adverse symptoms may include the following:, pain, watering, redness

Inhalation : Adverse symptoms may include the following:, respiratory tract irritation, coughing

Skin contact : Adverse symptoms may include the following:, pain or irritation, redness, blistering may occur

Ingestion : Adverse symptoms may include the following:, stomach pains

Indication of immediate medical attention and special treatment needed, if necessary

Notes to physician : In case of inhalation of decomposition products in a fire, symptoms may be delayed. The exposed person may need to be kept under medical surveillance for 48 hours.

Specific treatments : No specific treatment.

Protection of first-aiders : No action shall be taken involving any personal risk or without suitable training. If it is suspected that fumes are still present, the rescuer should wear an appropriate mask or self-contained breathing apparatus. It may be dangerous to the person providing aid to give mouth-to-mouth resuscitation. Wash contaminated clothing thoroughly with water before removing it, or wear gloves.

See toxicological information (Section 11)

Section 5. Fire-fighting measures

Extinguishing media

Suitable extinguishing media : Use an extinguishing agent suitable for the surrounding fire.

Unsuitable extinguishing media : None known.

Specific hazards arising from the chemical : In a fire or if heated, a pressure increase will occur and the container may burst. This material is very toxic to aquatic life. Fire water contaminated with this material must be contained and prevented from being discharged to any waterway, sewer or drain.

Hazardous thermal decomposition products : Decomposition products may include the following materials:
nitrogen oxides

Special protective actions for fire-fighters : Promptly isolate the scene by removing all persons from the vicinity of the incident if there is a fire. No action shall be taken involving any personal risk or without suitable training.

Special protective equipment for fire-fighters : Fire-fighters should wear appropriate protective equipment and self-contained breathing apparatus (SCBA) with a full face-piece operated in positive pressure mode.

Section 6. Accidental release measures

Personal precautions, protective equipment and emergency procedures

For non-emergency personnel : No action shall be taken involving any personal risk or without suitable training. Evacuate surrounding areas. Keep unnecessary and unprotected personnel from entering. Do not touch or walk through spilled material. Do not breathe vapor or mist. Provide adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Put on appropriate personal protective equipment.

For emergency responders : If specialized clothing is required to deal with the spillage, take note of any information in Section 8 on suitable and unsuitable materials. See also the information in "For non-emergency personnel".

Environmental precautions : Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers. Inform the relevant authorities if the product has caused environmental pollution (sewers, waterways, soil or air). Water polluting material. May be harmful to the environment if released in large quantities. Collect spillage.

Section 6. Accidental release measures

Methods and materials for containment and cleaning up

Small spill : Stop leak if without risk. Move containers from spill area. Dilute with water and mop up if water-soluble. Alternatively, or if water-insoluble, absorb with an inert dry material and place in an appropriate waste disposal container. Dispose of via a licensed waste disposal contractor.

Large spill : Stop leak if without risk. Move containers from spill area. Approach release from upwind. Prevent entry into sewers, water courses, basements or confined areas. Wash spillages into an effluent treatment plant or proceed as follows. Contain and collect spillage with non-combustible, absorbent material e.g. sand, earth, vermiculite or diatomaceous earth and place in container for disposal according to local regulations (see Section 13). Dispose of via a licensed waste disposal contractor. Contaminated absorbent material may pose the same hazard as the spilled product. Note: see Section 1 for emergency contact information and Section 13 for waste disposal.

Section 7. Handling and storage

Precautions for safe handling

Protective measures : Put on appropriate personal protective equipment (see Section 8). Do not get in eyes or on skin or clothing. Use only with adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Avoid release to the environment. Do not ingest. Empty containers retain product residue and can be hazardous. Keep in the original container or an approved alternative made from a compatible material, kept tightly closed when not in use. Do not reuse container. Do not breathe vapor or mist.

Advice on general occupational hygiene : Eating, drinking and smoking should be prohibited in areas where this material is handled, stored and processed. Workers should wash hands and face before eating, drinking and smoking. Remove contaminated clothing and protective equipment before entering eating areas. See also Section 8 for additional information on hygiene measures.

Conditions for safe storage, including any incompatibilities : Store in accordance with local regulations. Store in original container protected from direct sunlight in a dry, cool and well-ventilated area, away from incompatible materials (see Section 10) and food and drink. Store locked up. Keep container tightly closed and sealed until ready for use. Containers that have been opened must be carefully resealed and kept upright to prevent leakage. Do not store in unlabeled containers. Use appropriate containment to avoid environmental contamination. See Section 10 for incompatible materials before handling or use.

Section 8. Exposure controls/personal protection

Control parameters

Occupational exposure limits

Ingredient name	Exposure limits
Aqua Ammonia WATER ammonia	None. None. **California PEL for Chemical Contaminants (*Table AC-1*) (United States).** PEL: 25 ppm 8 hours. STEL: 35 ppm 15 minutes. **ACGIH TLV (United States, 3/2017).** TWA: 25 ppm 8 hours. TWA: 17 mg/m³ 8 hours. STEL: 35 ppm 15 minutes. STEL: 24 mg/m³ 15 minutes. **OSHA PEL 1989 (United States, 3/1989).** STEL: 35 ppm 15 minutes. STEL: 27 mg/m³ 15 minutes. **NIOSH REL (United States, 10/2016).** TWA: 25 ppm 10 hours. TWA: 18 mg/m³ 10 hours.

Section 8. Exposure controls/personal protection

	STEL: 35 ppm 15 minutes. STEL: 27 mg/m³ 15 minutes. **OSHA PEL (United States, 6/2016).** TWA: 50 ppm 8 hours. TWA: 35 mg/m³ 8 hours.

Appropriate engineering controls : Use only with adequate ventilation. If user operations generate dust, fumes, gas, vapor or mist, use process enclosures, local exhaust ventilation or other engineering controls to keep worker exposure to airborne contaminants below any recommended or statutory limits.

Environmental exposure controls : Emissions from ventilation or work process equipment should be checked to ensure they comply with the requirements of environmental protection legislation. In some cases, fume scrubbers, filters or engineering modifications to the process equipment will be necessary to reduce emissions to acceptable levels.

Individual protection measures

Hygiene measures : Wash hands, forearms and face thoroughly after handling chemical products, before eating, smoking and using the lavatory and at the end of the working period. Appropriate techniques should be used to remove potentially contaminated clothing. Wash contaminated clothing before reusing. Ensure that eyewash stations and safety showers are close to the workstation location.

Eye/face protection : Safety eyewear complying with an approved standard should be used when a risk assessment indicates this is necessary to avoid exposure to liquid splashes, mists, gases or dusts. If contact is possible, the following protection should be worn, unless the assessment indicates a higher degree of protection: chemical splash goggles and/or face shield. If inhalation hazards exist, a full-face respirator may be required instead.

Skin protection

Hand protection : Chemical-resistant, impervious gloves complying with an approved standard should be worn at all times when handling chemical products if a risk assessment indicates this is necessary. Considering the parameters specified by the glove manufacturer, check during use that the gloves are still retaining their protective properties. It should be noted that the time to breakthrough for any glove material may be different for different glove manufacturers. In the case of mixtures, consisting of several substances, the protection time of the gloves cannot be accurately estimated.

Body protection : Personal protective equipment for the body should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product.

Other skin protection : Appropriate footwear and any additional skin protection measures should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product.

Respiratory protection : Based on the hazard and potential for exposure, select a respirator that meets the appropriate standard or certification. Respirators must be used according to a respiratory protection program to ensure proper fitting, training, and other important aspects of use.

Section 9. Physical and chemical properties

Appearance

Physical state : Liquid.

Color : Colorless.

Odor : Pungent.

Odor threshold : 5 ppm

pH : Approx. 11.6 for 1 N Sol'n. in water

Melting point : 22ºF (5% solution) to −34ºF (19.9% solution)

Boiling point : Lowest known value: 38°C (100.4°F) (ammonia). Weighted average: 68.21°C (154.8°F)

Critical temperature : Not available.

Flash point : Not available.

Section 9. Physical and chemical properties

Evaporation rate : Not available.

Flammability (solid, gas) : Extremely flammable in the presence of the following materials or conditions: Oxidizing

Lower and upper explosive (flammable) limits : Lower: 16%
Upper: 25%

Vapor pressure : 3-10 PSI @ 16 ◦C

Vapor density : Vapor density 0.6 (Air = 1) (ammonia)

Specific Volume (ft ^{3}/lb) : 20.79

Gas Density (lb/ft ^{3}) : 0.0481

Relative density : 0.6

Solubility : Soluble in water. Soluble in alcohol and ether.

Solubility in water : Complete 540 g/l

Partition coefficient: n-octanol/water : Not available.

Auto-ignition temperature : 651 °C (1,204°F) (ammonia vapor)

Decomposition temperature : Not available.

Viscosity : Not available.

Flow time (ISO 2431) : Not available.

Section 10. Stability and reactivity

Reactivity : No specific test data related to reactivity available for this product or its ingredients.

Chemical stability : The product is stable.

Possibility of hazardous reactions : Under normal conditions of storage and use, hazardous reactions will not occur.

Conditions to avoid : No specific data.

Incompatible materials : Yellow Metals (brass & copper)

Hazardous decomposition products : Under normal conditions of storage and use, hazardous decomposition products should not be produced.

Hazardous polymerization : Under normal conditions of storage and use, hazardous polymerization will not occur.

Section 11. Toxicological information

Information on toxicological effects

Acute toxicity

Product/ingredient name	Result	Species	Dose	Exposure
Aqua Ammonia ammonia	LD50 Oral LC50 Inhalation Gas.	Rat Rat	350 mg/kg 7338 ppm	- 1 hours

Irritation/Corrosion

Product/ingredient name	Result	Species	Score	Exposure	Observation
Aqua Ammonia	Eyes - Severe irritant Eyes - Severe irritant	Rabbit Rabbit	- -	250 Micrograms 0.5 minutes 1 milligrams	- -

Sensitization

Section 11. Toxicological information

Not available.

Mutagenicity

Not available.

Carcinogenicity

Not available.

Reproductive toxicity

Not available.

Teratogenicity

Not available.

Specific target organ toxicity (single exposure)

Name	Category	Route of exposure	Target organs
Aqua Ammonia	Category 3	Not applicable.	Respiratory tract irritation

Specific target organ toxicity (repeated exposure)

Not available.

Aspiration hazard

Not available.

Information on the likely routes of exposure : Not available.

Potential acute health effects

Eye contact : No known significant effects or critical hazards.

Inhalation : May cause respiratory irritation.

Skin contact : Causes severe burns.

Ingestion : No known significant effects or critical hazards.

Symptoms related to the physical, chemical and toxicological characteristics

Eye contact : Adverse symptoms may include the following:, pain, watering, redness

Inhalation : Adverse symptoms may include the following:, respiratory tract irritation, coughing

Skin contact : Adverse symptoms may include the following:, pain or irritation, redness, blistering may occur

Ingestion : Adverse symptoms may include the following:, stomach pains

Delayed and immediate effects and also chronic effects from short and long term exposure

Short term exposure

Potential immediate effects : Not available.

Potential delayed effects : Not available.

Long term exposure

Potential immediate effects : Not available.

Potential delayed effects : Not available.

Potential chronic health effects

Not available.

General : No known significant effects or critical hazards.

Carcinogenicity : No known significant effects or critical hazards.

Section 11. Toxicological information

Mutagenicity : No known significant effects or critical hazards.

Teratogenicity : No known significant effects or critical hazards.

Developmental effects : No known significant effects or critical hazards.

Fertility effects : No known significant effects or critical hazards.

Numerical measures of toxicity

Acute toxicity estimates

Not available.

Section 12. Ecological information

Toxicity

Product/ingredient name	Result	Species	Exposure
Aqua Ammonia ammonia	Acute LC50 37 ppm Fresh water Acute EC50 29.2 mg/l Marine water Acute LC50 2080 µg/l Fresh water Acute LC50 0.53 ppm Fresh water Acute LC50 300 µg/l Fresh water Chronic NOEC 0.204 mg/l Marine water	Fish - Gambusia affinis - Adult Algae - Ulva fasciata - Zoea Crustaceans - Gammarus pulex Daphnia - Daphnia magna Fish - Hypophthalmichthys nobilis Fish - Dicentrarchus labrax	96 hours 96 hours 48 hours 48 hours 96 hours 62 days

Persistence and degradability

Not available.

Bioaccumulative potential

Product/ingredient name	$LogP_{ow}$	BCF	Potential
WATER	-1.38	-	low

Mobility in soil

Soil/water partition coefficient (K_{OC}) : Not available.

Other adverse effects : No known significant effects or critical hazards.

Section 13. Disposal considerations

Disposal methods : The generation of waste should be avoided or minimized wherever possible. Disposal of this product, solutions and any by-products should at all times comply with the requirements of environmental protection and waste disposal legislation and any regional local authority requirements. Dispose of surplus and non-recyclable products via a licensed waste disposal contractor. Waste should not be disposed of untreated to the sewer unless fully compliant with the requirements of all authorities with jurisdiction. Waste packaging should be recycled. Incineration or landfill should only be considered when recycling is not feasible. This material and its container must be disposed of in a safe way. Care should be taken when handling emptied containers that have not been cleaned or rinsed out. Empty containers or liners may retain some product residues. Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers.

Section 14. Transport information

	DOT	TDG	Mexico	IMDG	IATA
UN number	UN2672	UN2672	UN2672	UN2672	UN2672
UN proper shipping name	Ammonium Hydroxide or Ammonia solutions	AMMONIA SOLUTION	AMMONIA SOLUTION	AMMONIA SOLUTION	Ammonia solution
Transport hazard class(es)	8 	8 	8 	8 	8 
Packing group	III	III	III	III	III
Environmental hazards	Yes.	Yes.	Yes. The environmentally hazardous substance mark is not required.	Yes.	Yes. The environmentally hazardous substance mark is not required.

"Refer to CFR 49 (or authority having jurisdiction) to determine the information required for shipment of the product."

Additional information

DOT Classification : This product is not regulated as a marine pollutant when transported on inland waterways in sizes of ≤5 L or ≤5 kg or by road, rail, or inland air in non-bulk sizes, provided the packagings meet the general provisions of §§ 173.24 and 173.24a. **Reportable quantity** 1000 lbs / 454 kg. Package sizes shipped in quantities less than the product reportable quantity are not subject to the RQ (reportable quantity) transportation requirements.

TDG Classification : Product classified as per the following sections of the Transportation of Dangerous Goods Regulations: 2.40-2.42 (Class 8), 2.7 (Marine pollutant mark).
The marine pollutant mark is not required when transported by road or rail.

IMDG : The marine pollutant mark is not required when transported in sizes of ≤5 L or ≤5 kg.

IATA : The environmentally hazardous substance mark may appear if required by other transportation regulations.

Special precautions for user : **Transport within user's premises:** always transport in closed containers that are upright and secure. Ensure that persons transporting the product know what to do in the event of an accident or spillage.

Transport in bulk according to Annex II of MARPOL and the IBC Code : Not available.

Section 15. Regulatory information

U.S. Federal regulations : **TSCA 8(a) CDR Exempt/Partial exemption**: Not determined

Clean Water Act (CWA) 311: ammonia; ammonia

Clean Air Act (CAA) 112 regulated toxic substances: ammonia

Clean Air Act Section 112 (b) Hazardous Air Pollutants (HAPs) : Not listed

Clean Air Act Section 602 Class I Substances : Not listed

Section 15. Regulatory information

Clean Air Act Section 602 Class II Substances : Not listed

DEA List I Chemicals (Precursor Chemicals) : Not listed

DEA List II Chemicals (Essential Chemicals) : Not listed

SARA 302/304

Composition/information on ingredients

Name	%	EHS	SARA 302 TPQ		SARA 304 RQ	
			(lbs)	(gallons)	(lbs)	(gallons)
ammonia	5 - 19.9	Yes.	500	-	100	-

SARA 304 RQ : 502.5 lbs / 228.1 kg

SARA 311/312

Classification : Refer to Section 2: Hazards Identification of this SDS for classification of substance.

SARA 313

	Product name	CAS number	%
Form R - Reporting requirements	ammonia ammonia	1336-21-6 7664-41-7	100 5 - 19.9
Supplier notification	ammonia ammonia	1336-21-6 7664-41-7	100 5 - 19.9

SARA 313 notifications must not be detached from the SDS and any copying and redistribution of the SDS shall include copying and redistribution of the notice attached to copies of the SDS subsequently redistributed.

State regulations

Massachusetts : The following components are listed: AMMONIUM HYDROXIDE; AMMONIUM WATER; AMMONIA; AMMONIA, ANHYDROUS

New York : The following components are listed: Ammonium hydroxide; Ammonia

New Jersey : The following components are listed: AMMONIUM HYDROXIDE; AMMONIA

Pennsylvania : The following components are listed: AMMONIUM HYDROXIDE; AMMONIA

International regulations

Chemical Weapon Convention List Schedules I, II & III Chemicals

Not listed.

Montreal Protocol (Annexes A, B, C, E)

Not listed.

Stockholm Convention on Persistent Organic Pollutants

Not listed.

Rotterdam Convention on Prior Informed Consent (PIC)

Not listed.

UNECE Aarhus Protocol on POPs and Heavy Metals

Not listed.

Inventory list

Australia : All components are listed or exempted.

Canada : All components are listed or exempted.

China : All components are listed or exempted.

Europe : All components are listed or exempted.

Japan : **Japan inventory (ENCS)**: All components are listed or exempted.
Japan inventory (ISHL): Not determined.

Section 15. Regulatory information

Malaysia : All components are listed or exempted.

New Zealand : All components are listed or exempted.

Philippines : All components are listed or exempted.

Republic of Korea : All components are listed or exempted.

Taiwan : All components are listed or exempted.

Thailand : Not determined.

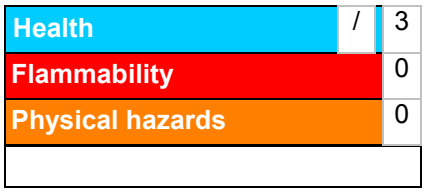
Turkey : Not determined.

United States : All components are listed or exempted.

Viet Nam : Not determined.

Section 16. Other information

Hazardous Material Information System (U.S.A.)



Caution: HMIS® ratings are based on a 0-4 rating scale, with 0 representing minimal hazards or risks, and 4 representing significant hazards or risks. Although HMIS® ratings and the associated label are not required on SDSs or products leaving a facility under 29 CFR 1910.1200, the preparer may choose to provide them. HMIS® ratings are to be used with a fully implemented HMIS® program. HMIS® is a registered trademark and service mark of the American Coatings Association, Inc.

The customer is responsible for determining the PPE code for this material. For more information on HMIS® Personal Protective Equipment (PPE) codes, consult the HMIS® Implementation Manual.

National Fire Protection Association (U.S.A.)

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Copyright ©2001, National Fire Protection Association, Quincy, MA 02269. This warning system is intended to be interpreted and applied only by properly trained individuals to identify fire, health and reactivity hazards of chemicals. The user is referred to certain limited number of chemicals with recommended classifications in NFPA 49 and NFPA 325, which would be used as a guideline only. Whether the chemicals are classified by NFPA or not, anyone using the 704 systems to classify chemicals does so at their own risk.

Procedure used to derive the classification

Classification	Justification
SKIN CORROSION - Category 1B	Expert judgment
SPECIFIC TARGET ORGAN TOXICITY (SINGLE EXPOSURE) (Respiratory tract irritation) - Category 3	Calculation method
AQUATIC HAZARD (ACUTE) - Category 1	Calculation method

History

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Date of previous issue : 2/15/2018

Version : 0.1

Section 16. Other information

Key to abbreviations : ATE = Acute Toxicity Estimate
BCF = Bioconcentration Factor
GHS = Globally Harmonized System of Classification and Labelling of Chemicals
IATA = International Air Transport Association
IBC = Intermediate Bulk Container
IMDG = International Maritime Dangerous Goods
LogPow = logarithm of the octanol/water partition coefficient
MARPOL = International Convention for the Prevention of Pollution From Ships, 1973 as modified by the Protocol of 1978. ("Marpol" = marine pollution)
UN = United Nations

References : Not available.

Other special considerations : Not available

Notice to reader

To the best of our knowledge, the information contained herein is accurate. However, neither the above-named supplier, nor any of its subsidiaries, assumes any liability whatsoever for the accuracy or completeness of the information contained herein.
Final determination of suitability of any material is the sole responsibility of the user. All materials may present unknown hazards and should be used with caution. Although certain hazards are described herein, we cannot guarantee that these are the only hazards that exist.

EARTHQUAKE

(Major where damage is suspect)

Important Contact List (for more – see Emergency Contact List)

Where to call	Phone number	Person making the call
Emergency & Ambulance	911	Operating Authority
CECP Management	See the Emergency Contact List	Operating Authority
SDGE Real-Time Desk - if operation of the unit(s) is affected.	(858) 650-6160	Operating Authority
VP, Regional Plant Operations (John Robertson) – for significant damages	(302) 381-6332 Cell	CECP Manager
NRG Spokesman: Manager, Communications (Ann Duhan) – for requests from the media/public about the situation	713-562-8817	CECP Manager
Core Injury Management - All employee injuries	(855) 723-3674	Injured employee's supervisor or designee
California Energy Commission Anwar Ali	916-698-7498	CECP Environmental Manager

I. Steps to Follow During an Earthquake

A. If you are Indoors: "DROP, COVER and HOLD ON"

1. Stay there - don't rush outside.
2. Remain calm - take cover under a sturdy table or desk or move against an interior wall and protect your head with your arms. Do not stand in a doorway.
3. Stay away from tall fixtures, windows and exterior walls.

B. If you are Outdoors:

1. Stay away from fallen electrical wires.
2. Move away from high structures, lamp posts, and chemical containers.

II. Assess Plant Status

A. Determine if earthquake was large enough to require emergency response.

B. Notify the Plant Manager or his designee and NRG Energy representatives.

C. Inspect the plant areas and equipment with emphasis given to critical equipment.

D. Furnish an assessment of plant damage and personnel status to the Plant Manager and NRG Energy representatives. (This report will be updated following a more thorough investigation.)

III. Determine Corrective Action (If required)

A. Identify problems where assistance is required from outside agencies

B. Identify and isolate potential sources of danger; i.e. natural gas, chemical tanks, high voltage lines, etc.

Note: Due to widespread devastation, outside assistance may not be readily available. Therefore, the station could be required to be self-sufficient for a period of time. In such case follow the Personnel Required to Stay On-site during an Evacuation Procedure in this Emergency Action Plan.

IV. Account for all Personnel

If the plant was not evacuated, all personnel shall be account for and report the results to the Control Room. Designated Station Contacts shall account for any contractors, visitors, delivery persons, gas company employees, vendors, etc. who are not part of the resident work force.

Note: If the earthquake necessitates the evacuation of a building, personnel shall report to their designated evacuation assembly area shown on the station map.

V. Assemble the Injured at a Central Location

A. Administer immediate first aid to injured personnel until the paramedics are at the plant.

B. If capable of being moved, transfer the injured to a safer area.

VI. First Aid Supplies

The first aid supplies, burn kit, and AED area located in the Control Room.

VII. Control Panic and Confusion

A. Remain Calm - reassure others

B. Give specific job assignments

C. If a supervisor is not available, the Operating Authority will assume his responsibilities

D. All employees remain on the job unless their supervisor releases them from duty.

VIII. Reassess the Situation (Equipment and Personnel Status)

Effective use and condition of personnel should be reviewed. All structures and equipment shall be inspected for possible damage. This includes but is not limited to:

A. Injured Personnel

B. Transformer casings, bushings and foundations

C. Fuel gas lines and connections

D. Chemical and water tanks

E. Turbine and Generator structures and foundation supports

F. Forward this updated report to the Plant Manager or his representative and others necessary persons.

IX. Determine if Hazardous Chemicals are Involved

A. Barricade the affected area

B. Review the Safety Data Sheets (SDSs) for chemical hazards, i.e. flashpoint, extinguishing agent, health hazard, first aid, etc.

C. Furnish outside agencies SDSs. This includes fire department, paramedics and hospital.

X. Organize Team to Contain the Situation

A. Evaluate problems associated with online units and units removed from service.

B. Identify and isolate dangerous areas.

C. Provide personnel, engineering and materials to repair damaged equipment.

XI. Call out Additional Personnel as Required

XII. Assess Damage for Media Reporting Purposes

To ensure consistency in the release of information, a single qualified spokesman will handle interface with news media. For CECP Energy Station, the spokesman will be Senior Director of Wholesale Public Relations and Media Relations. Any telephone calls or inquiries relating to the incident will be directed to this person.

XIII. Establish an Emergency Communication Center at the Control Room, if necessary.

A. Plant activities during an emergency will be recorded in chronological order in the emergency communication center.

XIV. Secure Plant Perimeter

A. Operations will be responsible in performing this function

B. Only authorized persons will be allowed on site.

C. Secure plant perimeters, direct traffic, document all personnel entering and leaving station and limit access to authorized personnel only.

D. Contact the family members of the injured who were transported to hospitals.

XVI. Establish On-Site Teams for Around the Clock Coverage (if- required)

During the crisis, management personnel will supervise and coordinate around-the-clock teams through the unstable and transition periods. This surveillance will continue until conditions stabilize and there is no further danger to personnel and equipment.

HIGH WIND CONDITIONS

Important Contact List (for more – see Emergency Contact List)

Where to call	Phone number	Person making the call
Emergency & Ambulance	911	Operating Authority
CECP Management	See the Emergency Contact List	Operating Authority
SDGE Real-Time Desk - if operation of the unit(s) is affected.	(858) 650-6160	Operating Authority
VP, Regional Plant Operations (John Robertson) – for significant damages	(302) 381-6332 Cell	CECP Manager
NRG Spokesman: Manager, Communications (Ann Duhan) – for requests from the media/public about the situation	713-562-8817	CECP Manager

Note: Plant structures are designed to withstand high wind but considerable plant damage could occur with winds of lesser magnitude.

I. Assess Plant Status

A. If high winds occur, and when applicable, notify the persons on the Contact List above to alert them of potential plant problems and update them on weather conditions in the area.

B. Notify the persons if the station sustains major damage, is disabled, or placed on restricted load due to the wind.

C. In the event of high winds:

1. Check and monitor condition of all structures, especially those constructed of fiberglass or metal. Inspections should be conducted from the upwind side of any structure if possible. Use checklist provided in this section.

2. Close all doors tightly to prevent damage to mechanical and electrical apparatus from blowing particles.

3. Call out operating and maintenance personnel as required for assistance.

D. Precautions

1. Wear close fitting safety glasses

2. Avoid high areas

3. Don’t use the overhead crane

4. Exercise caution when driving vehicles. Blowing particles can create poor visibility.

RAIN- WIND STORMS (WITH GUSTS ABOVE 32 MPH) PREPARATION CHECKLIST

BEFORE

☐ Control room will monitor weather during an event
☐ Walk site – conduct pre-rain inspection day before. Identify corrective actions needed.
☐ Remove temporary covers from shade structures
☐ Secure lids/ trash cans/other items that generally roll/blow during storms
☐ Have extra absorbent towels/rags in admin building to keep floors dry
☐ Make sure phones fully charged, carts/vehicles fully fueled, comm systems working properly
☐ Anticipate areas that flood during rain, clear those areas of any sitting material (N of warehouse) if possible
☐ Have straps or other means on hand to brace/anchor yard signs, storage, or other items as needed.
☐ Evaluate roof mounted equipment – strap/secure if needed

DURING STORM

☐ Monitor property for any damage, if safe to do so.

AFTER

☐ Walk site and inspect for any damage. Report to management any urgent findings
☐ Inspect bioswale area to verify condition is normal
☐ Restore temporary covers from shade structures

_____
_____
_____
_____
_____
_____
_____
_____

_____ _____
Signature Date

BOMB THREAT

Important Contact List (for more – see Emergency Contact List)

Where to call	Phone number	Person making the call
Emergency, Ambulance and Police	911	Operating Authority
CECP Management	See the Emergency Contact List	Operating Authority
SDGE Real-Time Desk - if operation of the unit(s) is affected.	(858) 650-6160	Operating Authority
VP, Regional Plant Operations (John Robertson) – for significant damages	(302) 381-6332 Cell	CECP Manager
Corporate Security (Aaron Malady)	(713) 537-2730	CECP Manager
NRG Spokesman: Manager, Communications (Ann Duhan) – for requests from the media/public about the situation	713-562-8817	CECP Manager
California Energy Commission Anwar Ali	916-698-7498	CECP Environmental Manager
Federal Bureau of Investigation (FBI)	(310)477-6565	Operating Authority or CECP Manager

Note: Bomb threats may be received by telephone, mail, e-mail, or other means.

I. Discovery

A. For bomb threats received by telephone, the person who receives the threat shall:

1. Remain calm and try to keep the caller talking.
2. Record all information and exact comments made by the caller accurately. Fill out the Bomb Threat Checklist AS COMPLETELY AS POSSIBLE!
3. Do not transfer the bomb threat call to another employee.
4. Do not hang up first.

B. For bomb threats received by mail, report it to the management.

C. If a suspicious item has been sent to the facility by mail or delivery service, relocate it to a nearby segregated area. Since the item has already been handled by many people, it should be safe for relocating.

II. Notification

A. Report the threat to the CECP Management IMMEDIATELY.

B. Call 911 to report the threat to the local law enforcement.

C. Notify the dispatcher, if the unit operation is affected.

D. Contact the Corporate Security Manager.

III. Assessment - CECP management will evaluate the available information and make appropriate responding procedures whether:

A. To have the employees to move to the areas where they typically receive daily work assignments for check-in and for further instructions.

B. To activate the plant Emergency Notification System to evacuate the plant.

C. The personnel are to return to their workstations when the plant management determines it is safety to do so.

III. Response

A. Employees/contractors shall follow directions issued by two-way radio system or by supervision in charge.

B. Visitors/vendors are the responsibility of the personnel they are visiting (Station Contact).

C. Assign personnel to monitor/control automotive and pedestrian traffic in and out of the facility.

IV. CECP management is to decide if the personnel would need to search the plant to look for a suspicious package that may contain an explosive material. Refer to section 5.1 Bomb Threat Policy in the Operations Security Plan and the NRG Corporate Policy for Bomb Threat Response (SEC-2911) for the threat evaluation procedures.

V. Establish an Emergency Communication Center (if necessary) at the Control Room. Station activities during an emergency will be recorded in chronological order in the emergency communication center.

VI. Media reporting

To ensure consistency in the release of information, a single NRG corporate spokesperson will handle interface with news media. Any inquiries relating to the incident will be directed to this person. The media will not be allowed in the plant.

BOMB THREAT CHECKLIST

NRG Energy, Inc.
Bomb Threat Checklist

PLACE THIS CARD UNDER YOUR TELEPHONE

QUESTIONS TO ASK

1. When is the bomb going to explode?
2. Where is the bomb right now?
3. What does the bomb look like?
4. What kind of bomb is it?
5. What will cause the bomb to explode?
6. Why was the bomb placed?
7. Did you place the bomb?
9. What is your name?

EXACT WORDING OF BOMB THREAT

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

Sex of caller: _____ Race: _____

Length of call: _____ Age: _____

Telephone number at which call is received: _____

Date call received: _____ Time call received: _____

CALLER'S VOICE

☐ Calm ☐ Soft ☐ Stutter ☐ Whispered
☐ Laughter ☐ Rasp ☐ Rapid ☐ Normal
☐ Nasal ☐ Angry ☐ Loud ☐ Disguised
☐ Slow ☐ Crying ☐ Deep ☐ Distinct
☐ Slurred ☐ Lisp ☐ Ragged ☐ Cracking Voice
☐ Familiar ☐ Accent ☐ Excited ☐ Deep Breathing

If voice is familiar, who did it sound like?

_____

BACKGROUND SOUNDS

☐ Street Noises ☐ Clear ☐ Long Distance
☐ Voices ☐ Motor ☐ Phone Booth
☐ Animal Noises ☐ Static ☐ Office Noises
☐ PA System ☐ Cell Phone ☐ House Noises
☐ Music ☐ Local ☐ Factory Noises
☐ Other *(Please specify)*: _____

BOMB THREAT LANGUAGE

☐ Well Spoken (educated) ☐ Incoherent
☐ Foul ☐ Message Read
☐ Taped ☐ Irrational

Remarks: _____

_____

_____

_____

Your Name: _____

Your Title: _____

Phone Number: _____

Date Checklist Completed: _____

Call 911 with this information immediately
Notify your Supervisor
Call Corporate Security at 716-725-8165

BOMB THREAT **BOMB THREAT**

TERRORIST ACTIVITY

Important Contact List (for more – see Emergency Contact List)

Where to call	Phone number	Person making the call
Emergency. Ambulance and Police	911	Operating Authority
CECP Management	See the Emergency Contact List	Operating Authority
SDGE Real-Time Desk - if operation of the unit(s) is affected.	(858) 650-6160	Operating Authority
VP, Regional Plant Operations (John Robertson) – for significant damages	(302) 381-6332 Cell	CECP Manager
Corporate Security (Aaron Malady)	(713) 537-2730	CECP Manager
NRG Spokesman: Manager, Communications (Ann Duhan) – for requests from the media/public about the situation	713-562-8817	CECP Manager
California Energy Commission Anwar Ali	916-698-7498	CECP Environmental Manager
Federal Bureau of Investigation (FBI)	(310)477-6565	Operating Authority or CECP Manager

Note: It is the CECP Management's objective to provide maximum protection to station personnel, consistent with providing electrical service to our customers during periods of disturbance. It is expected that in such instances, law enforcement agencies will establish boundaries delineating the trouble area(s) and will set forth rules for limited access. CECP uses a three-level system of security, which should be adhered to in time of uncertainty.

I. Discovery

The person who discovers a terrorist activity shall immediately inform the Control Room with the following information:

A. Discoverer's name and location.

B. Exact location of terrorist activity.

C. Any apparent conditions or hazards that could increase the level of danger.

II. Levels of system of security

Level 3 When there is an increased possibility of a terrorist act, but the nature and extent of the act is unpredictable.

A. Ensure ability to identify all on site personnel.

B. Check the identification of all visitors and contractors. Do not grant access unless you are absolutely sure the person has legitimate identification.

C. Increase spot checks of vehicles, people, mail, packages, briefcases, etc. entering and leaving the site.

D. Report suspicious activity (e.g., people, vehicles, packages, etc.) to the supervisor.

E. Frequently check areas where hazardous substances are stored and ensure storage-tank valves are protected. Check containment systems around storage facilities.

F. Check and repair, as necessary, fences, gates and lighting.

G. Use a minimum number of access points and close and lock the points not used.

H. Contact firms that provide guard services to your site and ask what steps they are taking to furnish guards on short notice.

I. Contact emergency agencies and furnish a list with phone numbers of critical site personnel.

J. Ensure emergency agencies serving your location have directions to your site.

K. Request periodic patrol checks from the police agency serving your facility.

L. Look ahead to requirements associated with Levels 1 and 2.

Level 2 When the threat of a terrorist act is more predictable, or terrorist activity exists.

A. Review requirements associated with Level 3.

B. Communicate information to employees and encourage community security awareness of suspicious activity.

C. Evaluate assigning security guards to sites, especially during non-daylight hours, weekends and holidays, and ensure guards have specific direction on their duties.

D. Check, to the extent possible, all vehicles, people, mail, packages, briefcases, etc. entering and leaving the site and placard visiting vehicles indicating they have been checked by security.

E. Assign areas of the site to employees/guards and require periodic inspections of the areas for suspicious items and activity.

F. Advise all personnel to inspect deliveries, packages, mail, etc. and notify the supervisor if there is any concern.

G. Report trespassers.

H. Develop steps that need to be taken to seal off an area, if prudent (i.e. collision barriers, heavy equipment, etc.).

I. Prohibit non-company vehicle parking within 30 yards of critical equipment.

J. Practice emergency action plans.

K. Increase communication with the police agency serving your facility and request more frequent patrol checks.

L. Review requirements associated with Level 1.

Level 1 When a terrorist act is imminent or has occurred.

A. Review requirements associated with Levels 2 and 3.

B. Refuse access if people do not have positive identification or do not have a legitimate need to enter the site.

C. Reduce site ingress and egress points to an absolute minimum.

D. Check all vehicles (including inside, outside and undercarriage), people, mail, packages, briefcases, etc. entering and leaving the site and placard vehicles indicating they have been checked by security. If possible, offload all vehicles outside the site's perimeter fence and move the deliveries inside the fence using company vehicles and personnel.

E. Use security guards round-the-clock.

F. Guards should continually check the perimeter fence and critical facilities while staying in communication with site personnel via two-way radio.

G. Install collision barriers around critical facilities, if prudent.

H. Request consistent patrol checks from the police agency serving your facility.

III. Media reporting

To ensure consistency in the release of information, a single NRG corporate spokesperson will handle interface with news media. Any inquiries relating to the incident will be directed to this person. The media will not be allowed in the plant.

INTRUSION

Important Contact List (for more – see Emergency Contact List)

Where to call	Phone number	Person making the call
Emergency & Police	911	Operating Authority
CECP Management	See the Emergency Contact List	Operating Authority
SDGE Real-Time Desk - if operation of the unit(s) is affected.	(858) 650-6160	Operating Authority
VP, Regional Plant Operations (John Robertson) – for significant damages	(302) 381-6332 Cell	CECP Manager
Corporate Security (Aaron Malady)	(713) 537-2730	CECP Manager

Note: Intrusion is defined as an act of an unauthorized person or persons entering station property.

I. Notification

A. Station employees should monitor the intruder's movements in the plant area but do not attempt to physically restrain the individual(s).

B. Call the persons on the above list, including 911 regarding the intruder's movements, location, activities and physical attributes such as carrying a weapon or handbag.

C. The location of anything dropped or left behind by the intruder should be documented and left for local authorities to inspect and remove.

Note: Avoid confrontation at all cost.

SABOTAGE REPORTING

Important Contact List (for more – see Emergency Contact List)

Where to call	Phone number	Person making the call
Emergency & Ambulance	911	Operating Authority
CECP Management	See the Emergency Contact List	Operating Authority
SDGE Real-Time Desk - if operation of the unit(s) is affected.	(858) 650-6160	Operating Authority
VP, Regional Plant Operations (John Robertson) – for significant damages	(302) 381-6332 Cell	CECP Manager
Corporate Security (Aaron Malady)	(713) 537-2730	CECP Manager
NRG Spokesman: Manager, Communications (Ann Duhan) – for requests from the media/public about the situation	713-562-8817	CECP Manager
California Energy Commission Anwar Ali	916-698-7498	CECP Environmental Manager
Federal Bureau of Investigation (FBI)	(310) 477-6565	Operating Authority or CECP Manager

Note: Sabotage is an intentional obstruction of an activity, or willful and malicious destruction of other's property. It is aimed at weakening a government or corporation through subversion, obstruction, disruption, or destruction. One who engages in sabotage typically tries to conceal their identities because of the consequences of their actions.

I. When there is an increased possibility of a sabotage act, but the nature and extent of the act is unpredictable:

A. Identify all plant personnel.

B. Check the identification of all visitors and contractors. Do not grant access to the plant unless the person has legitimate identification.

C. Increase spot checks of vehicles, people, mail, packages, briefcases, etc. entering and leaving the site.

D. Report suspicious activity (e.g., people, vehicles, packages, etc.) to the station management.

E. Frequently check areas where hazardous substances are stored and ensure storage-tank valves are protected. Check containment systems around storage facilities.

F. Check and repair, as necessary, fences, gates, and lighting.

G. Use a minimum number of access points and close the points not used.

H. The emergency responders are those who trained in the Hazardous Waste Operations, First Responder Level (HAZWOPER).

I. Contact emergency agencies and furnish a list with phone numbers of critical plant personnel.

J. Ensure emergency agencies serving the station location have directions to the station.

K. Request periodic patrol checks from the police agency serving CECP area.

L. Be cautious how information pertaining to security is communicated to employees and the media.

M. Look ahead to requirements associated with Security Levels 1 and 2 (see the Terrorist Activity procedure).

II. When a sabotage event is imminent or has occurred.

A. Refuse access if people do not have positive identification or do not have a legitimate need to enter the station.

B. Reduce station ingress and egress points to an absolute minimum.

C. Check all vehicles (including inside, outside and undercarriage), people, mail, packages, briefcases, etc. entering and leaving the station and placard vehicles indicating they have been checked. If possible, offload all vehicles outside the station's perimeter fence and move the deliveries inside the fence using company vehicles and personnel.

D. If can be arranged, use security guards round-the-clock.

E. Guards should continually check the perimeter fence and critical equipment while staying in communication with station personnel via two-way radio.

F. Request consistent patrol checks from the police agency serving CECP.

III. Media reporting

To ensure consistency in the release of information, a single NRG corporate spokesperson will handle interface with news media. Any inquiries relating to the incident will be directed to this person. The media will not be allowed in the plant.

FALL RESCUE PLAN

Important Contact List (for more – see Emergency Contact List)

Where to call	Phone number	Person making the call
Emergency & Ambulance	911	Operating Authority
CECP Management	See the Emergency Contact List	Operating Authority
VP, Regional Plant Operations (John Robertson) – for significant injuries	(302) 381-6332 Cell	CECP Manager
Core Injury Management - All employee injuries	(855) 723-3674	Injured employee's supervisor or designee
Director, Operational Safety (Michael Hagenmayer) - This person will notify Cal/OSHA, if applicable	(315) 349-2329 Office (202) 213-9109 Cell	Safety Specialist
California Energy Commission Anwar Ali	916-698-7498	CECP Environmental Manager
Division of Occupational Safety & Health (Cal/OSHA) - Serious employee injury or fatality	(626)239-0369	Regional Safety Manager

I. In the event a person falls while wearing a fall arresting device and is trapped in their harness above ground level, the following should be implemented:

A. Notify the Control Room. Give as much information as you can, i.e. location, person involved, injury status, level of consciousness, etc.

B. The Operating Authority is to call 911. Place an operator at the main gate to direct the rescue vehicles.

C. If any contractors have the rescue equipment and trained rescuer on-site, attempt the rescue. While waiting for the fire department personnel to arrive, attempt to rescue the person without exposing additional personnel to hazards by providing ladder, man lift, forklift, etc. to help the victim to support himself.

D. Administer first aid as needed.

II. Time is critical.

Depending on the person, loss of consciousness, serious injury and/or death can occur in less than 20 minutes. Rescue of an unconscious person is much more difficult, therefore call 911 immediately and provide relevant information about the incident so that the fire department can bring appropriate equipment to the station.

WATER RESCUE

Important Contact List (for more – see Emergency Contact List)

Where to call	Phone number	Person making the call
Emergency & Ambulance	911	Operating Authority
CECP Management	See the Emergency Contact List	Operating Authority
Core Injury Management - All employee injuries	(855) 723-3674	Injured employee's supervisor or designee
Director, Operational Safety (Michael Hagenmayer) - This person will notify Cal/OSHA, if applicable	(315) 349-2329 Office (202) 213-9109 Cell	Safety Specialist
Division of Occupational Safety & Health (Cal/OSHA) - Serious employee injury or fatality	(626) 239-0369	Regional Safety Manager

I. In the event a person falls into water (Pit/Vault/Tank) and needs to be rescued:

A. Notify the Control Room. Give as much information as you can, i.e. location, person involved, injury status, level of consciousness, etc.

B. Call 911. Place an operator at the main gate to direct the rescue vehicles.

C. Do NOT enter the water to assist. If the person in the water is frantic, he/she may drown the rescuer.

D. Assist him/her out of the water.

E. Administer first aid as needed.

ACTIVE SHOOTER

Important Contact List (for more – see Emergency Contact List)

Where to call	Phone number	Person making the call
Emergency and Police	911	Operating Authority
CECP Management	See the Emergency Contact List	Operating Authority
SDGE Real-Time Desk - if operation of the unit(s) is affected.	(858) 650-6160	Operating Authority
VP, Regional Plant Operations (John Robertson) – for significant damages	((302) 381-6332 Cell	CECP Manager
Corporate Security (Aaron Malady)	(713) 537-2730	CECP Manager
NRG Spokesman: Manager, Communications (Ann Duhan) – for requests from the media/public about the situation	713-562-8817	CECP Manager
Core Injury Management - All employee injuries	(855) 723-3674	Injured employee's supervisor or designee
California Energy Commission Anwar Ali	916-698-7498	CECP Environmental Manager
Federal Bureau of Investigation (FBI)	(310) 477-6565	Operating Authority or CECP Manager

Note: Active shooter incidents are often over in 10 -15 minutes before law enforcement arrives. Typically, law enforcement is dispatched for final resolution of the event.

The following steps are actions to be taken if an active shooter is identified onsite. Also refer to the Operations Security Plan for steps to report, evacuate, and respond to an active shooter.

I. Immediate actions to take:

A. If any employee observes an armed person or active shooter within the plant, notify the Unit Control Room immediately, if possible and safe to do so.

B. The Operating Authority receiving the notification of the active shooter is to **immediately** call 911 to report:

1. Location of the active shooter.
2. Number of shooters.
3. Physical description of shooters.

4. Number and type of weapons held by shooters.
5. Number of potential victims at the location.

C. Notify and warn on-site personnel **immediately** using the two-way radio system (while the Operating Authority is calling 911, another person should make this notification if he/she is available):

1. Notify an armed person/active shooter has been observed.
2. The specific location of the active shooter in the plant and his/her description.
3. Determine a location where personnel can safely evacuate to and notify the personnel without alerting the active shooter of the location.

D. Report the situation to the plant management, if safe to do so.

II. Responding actions to the active shooter

A. If possible, evacuate the area and get to safety:

1. Remain calm.
2. Take immediate action.
3. Evacuate staff and personnel via an evacuation route to a safe area.
4. Leave your belongings behind.
5. No matter the circumstances, if you decide to evacuate, DO NOT attempt to stop and monitor any equipment while exiting.

B. Shelter in place, if unable to evacuate:

1. Hide in area out of the shooter's view.
2. Block/barricade entry to your hiding place and lock all doors.
3. Silence your cell phone while hiding.
4. In the event that an Operating Authority determines that an active shooter is attempting to or has entered the Control Room, the Operating Authority is authorized to:
   a. Barricade in place if this is determined to be the best option, or
   b. Shut down any operating units (Trip) and seek a safe location or evacuate the plant.

C. Act against the shooter only in a last resort:

1. Only when your life is in immediate danger.

2. Attempt to incapacitate the shooter and act with physical aggression.

III. Make notifications to the persons on the above Contact List, if possible and safe to do so.

IV. Media reporting

To ensure consistency in the release of information, a single NRG corporate spokesperson will handle interface with news media. Any inquiries relating to the incident will be directed to this person. The media will not be allowed in the plant. The media will not be allowed in the plant.

V. Incident after-action

A. Account for all personnel at a designated assembly area.
B. Notification of families of personnel affected by the incident.
C. Refer visibly shaken personnel to EAP providers.
D. Identify and fill any operational gaps left by the incident.
E. Prepare lessons learned report.

PERSONNEL REQUIRED TO STAY ON-SITE DURING AN EVACUATION

Important Contact List (for more – see Emergency Contact List)

Where to call	Phone number	Person making the call
Emergency	911	Operating Authority
CECP Management	See the Emergency Contact List	Operating Authority
SDGE Real-Time Desk - if operation of the unit(s) is affected.	(858) 650-6160	Operating Authority
Core Injury Management - All employee injuries	(855) 723-3674	Injured employee's supervisor or designee

I. Purpose

This procedure is for the personnel who are required to stay in the plant during an emergency evacuation to be self-sufficient.

II. Condition

Because damages to the building and equipment can occur during an emergency situation, employees shall only be required to stay in the plant when it is safe to do so.

III. The number of personnel to stay

If possible, more than one personnel are to be in the plant at a given time during an emergency and they are to communicate to be updated of each other's safety.

IV. Sleep

Find a location where the building structure is safe to use as a shelter. Take turns to sleep to ensure at least one person is monitoring the surrounding.

V. Emergency food and water are kept in the warehouse.

VI. Emergency kits located in the warehouse include the following:

A. Batteries – more in the library at the front of the admin building
B. Radio
C. Dust masks
D. Sleeping bags
E. Garbage bags
F. Toiletries
G. Raincoats

H. Writing tablets and pens
I. Flashlights in the charging area in the Control Room
J. Medical supplies – in the first aid kits in the Control Room and Warehouse Building.

CONFINED SPACE EMERGENCY RESCUE

Important Contact List (for more – see Emergency Contact List)

Where to call	Phone number	Person making the call
Emergency	911	Operating Authority
CECP Management	See the Emergency Contact List	Operating Authority
SDGE Real-Time Desk - if operation of the unit(s) is affected.	(858) 650-6160	Operating Authority
Director, Operational Safety (Michael Hagenmayer) - If anyone is injured. This person will notify Cal/OSHA, if applicable	(315) 349-2329 Office (202) 213-9109 Cell	Safety Specialist
California Energy Commission Anwar Ali	916-698-7498	CECP Environmental Manager
Core Injury Management - All employee injuries	(855) 723-3674	Injured employee's supervisor or designee

Note:

1. Under any circumstances, no station personnel shall enter a Permit-Required Confined Space (PRCS).
2. All contractors and station personnel must comply with NRG Confined Space and LOTO procedures when entering in any confined space.
3. Try various methods to make a PRSC safer to enter as a Non-Permit Required Space or as an Alternative Entry Procedure.
4. Any entries into PRCS are to be done by trained contractors.
5. Prior to entering PRCS, a detailed rescue plan is required.
6. Trained and qualified rescuers with rescue equipment are required to be at the PRCS prior to anyone entering it.

I. Discovery

The person who discovers an emergency in a confined space shall immediately inform the Control Room with the following information.

A. Discoverer's name and location.

B. Exact location of the confined space needing a rescue.

D. Type of emergency or injuries if any.

E. Any apparent conditions or hazards that could increase the level of danger (i.e., chemicals, flammable liquids or gases).

F. Description of any action being taken or about to be taken.

II. Notification

A. The Operating Authority is to:

1. Gather information from the person reporting the emergency. Use the Emergency Response Information Form (addendum 1).
2. Notify 911, if necessary.
3. Notify the station management.

III. Confined Space Rescue

A. Rescuers

1. Unless the contractor has a written rescue plan and trained rescuers onsite, no one is allowed to enter a PRCS.
2. When anyone is entering a Permit Require Confined Space (PRCS), trained rescuers (contractors) are required to be at that confined space ready to provide a rescue. Only trained and qualified rescuers are to perform any rescue activities.
3. For a non-Permit Required Confined Space, the qualified rescuers (contractors) are to perform the rescue, if they are available in the station. If not, the CO is to call 911 to request the fire department personnel to handle the rescue.

B. Rescue procedure:

1. Barricade the affected area.
2. The CO, Confined Space Entry Supervisor, and rescuers are to evaluate the hazards in the confined space before attempting a rescue.
3. The CO and the Entry Supervisor are to verify the rescue procedure.
4. Rescuers are to attempt a non-entry rescue using a tripod with retrieval system (harness, lanyards and winch) before entering the confined space.
5. If the rescuer(s) must enter the confined space, the Entry Supervisor and CO must authorize the entry.
6. Pre-entry job briefing shall be conducted by the Entry Supervisor and discuss about the hazards in the confined space.
7. Before the entering a PRCS, hazards in the confined space need to be controlled, including atmospheric hazards. Verify by testing oxygen, combustible gases and vapors, and then for toxic gases and vapors.

8. The rescuers must wear applicable PPE, including respirators and follow the confined space entry procedure.
9. Once the injured person is removed from the space, provide applicable first aid and CPR until Emergency Medical Service arrives.

IV. Establish an Emergency Communication Center (if necessary) at the Control Room. Plant activities during an emergency will be recorded in chronological order in the emergency communication center.

V. Media reporting

To ensure consistency in the release of information, a single NRG corporate spokesperson will handle interface with news media. Any inquiries relating to the incident will be directed to this person. The media will not be allowed in the plant. The media will not be allowed in the plant.

CATASTROPHIC SYSTEM FAILURE RESPONSE

Important Contact List (for more – see Emergency Contact List)

Where to call	Phone number	Person making the call
Emergency	911	Operating Authority
CECP Management	See the Emergency Contact List	Operating Authority
SDGE Real-Time Desk - if operation of the unit(s) is affected.	(858) 650-6160	Operating Authority
VP, Regional Plant Operations (John Robertson) – for significant failures	(302) 381-6332 Cell	CECP Manager
NRG Spokesman: Manager, Communications (Ann Duhan) – for requests from the media/public about the situation	713-562-8817	CECP Manager
Global Infrastructure Partners – Michael O'Toole	(312) 835-8527 Cell	CECP Environmental Manager
California Energy Commission Anwar Ali	916-698-7498	CECP Environmental Manager
Core Injury Management - All employee injuries	(855) 723-3674	Injured employee's supervisor or designee

Note:

1) Catastrophic System Failure (CSF) is a failure of any power plant system's integrity, which would result in the sudden and uncontrollable release, water, fuel, air, chemicals, etc. The failure may or may not have displayed any warning signs and may have begun as a fire or explosion related incident that escalated into a catastrophic system failure. This type of failure places all personnel in the station at risk.

2) Refer to applicable emergency procedures in this Emergency Action Plan that are applicable during a CSF incident.

WARNING: A CSF would require an immediate implementation of the Station Emergency Action Plan and all if not most of the emergency support documents contained within.

Q. Discovery

The person who discovers a catastrophic system failure (CSF) shall immediately inform the Control Room with the following information. Use 3-way communication to verify the information between the persons reporting and receiving the report.

A. Discoverer's name and location.

B. Exact location or system involved with the CSF.

C. Name or the equipment/system involved with CSF, symptoms or characteristics of a CSF witnessed and events that could lead to a CSF.

D. Type of injuries, if any.

II. Notification - The Operating Authority is to immediately:

A. Notify CECP Management

B. Notify 911.

1. Types(s) of incident(s).
2. Number of injured persons
3. Natures of injuries
4. Specific request (HAZMAT, heavy rescue, fire, ambulance, etc.)

Note: Assign someone to the main gate to direct emergency vehicles entering the site.

C. Notify station personnel by making an announcement via the plant paging system of the following. Repeat it 3 times:

ATTENTION ALL PERSONNEL!

THERE IS A (emergency situation detail) AT (location).

STAY AWAY FROM THIS LOCATION

D. If personnel evacuation is necessary, follow the Personnel Evacuation procedure in this Emergency Action Plan.

E. Notify SDGE Real-Time Desk of possible issues with the load or operation of the unit(s).

III. Determine Corrective Actions

A. The Operating Authority is to have an Operator(s) to assess the incident scene to determine the situation.

B. Communicate the findings with the Control Room.

C. Execute internal corrective measures that have been directed by the Operating Authority such as:

1. De-energization of electrical systems
2. Shutting down process systems
3. Removing equipment/system from service
4. Adjusting station/unit/equipment loading based on the incident

D. Implement emergency actions based on assessment of circumstances

IV. Establish an Emergency Communication Center (if necessary) at the Control Room.
All plant activities will be recorded in chronological order, including equipment problems, personnel injuries, calls, actions taken, updates on station status and generation availability.

IV. Post Catastrophic System Failure Action

A. Re-Assess Plant Status

B. Notify the Control Room when the incident is secured or over.

C. If necessary, the Operating Authority is to conduct a visual inspection of the CSF scene to verify the status.

D. The Operating Authority is to notify station management of the status.

E. Notify personnel of the status by stating the following 3 times:

ATTENTION ALL PERSONNEL!

THE (emergency situation) IS SECURED

IV. Post Catastrophic System Failure Review

A. If necessary, CECP Management is to conduct a visual inspection of the CSF scene.

B. All station safety systems must be identified, and a plan developed to restore them to service.

C. Environmental impact must be determined.

D. Applicable agencies must be notified.

E. Fire/Rescue equipment must be inventoried and returned to service.

F. Post incident critique must be conducted.

G. Submit the post review report of the CSF to applicable station and corporate personnel.

V. Drill – An annual drill is to be conducted with a scenario relating to CSF.

VI. Media reporting

To ensure consistency in the release of information, a single NRG corporate spokesperson will handle interface with news media. Any inquiries relating to the incident will be directed to this person. The media will not be allowed in the plant. The media will not be allowed in the plant.

ADDENDUM 1

Emergency Response Information Form

Type of Emergency:		Time Reported:	AM □ PM □
Specific Location Of Emergency:			
Person Reporting:		Reporting From:	
Injuries (Nature/Extent/Number Injured):			
Actions Being Taken:			
Assistance Needed:			
Weather Conditions (circle): Rainy Sunny Cloudy Foggy Windy			
Wind Direction		Speed mph	
Alarms Sounded(circle): Fire Bomb Chemical Release Evacuation			
Supervision Contacted:		Time:	AM □ PM □
Outside Agencies Contacted:			
General Comments:			
Written By:		Date:	

ADDENDUM 2

Safety & Health Incident Notification Instructions - California

Emergency

This includes, but may not be limited to a work related fatality or hospitalization of an employee or contractor for treatment other than observation, fire/explosion/rescue requiring offsite response, spill/release requiring community evacuation or shelter-in-place and any event that results in media presence or adverse attention:

1. Once the scene has been stabilized and medical treatment provided as necessary, the Plant Manager or designee will immediately (within the hour) verbally contact the Vice President responsible for the affected facility, plant or office and provide the following information:

- Names of injured individuals, company if contractor, nature of injuries and treatment
- Brief description of the incident, including plant status at the time
- Description of any off-site impact and actions taken
- Apparent cause(s) of the incident if obvious; do not speculate
- Immediate corrective actions
- Additional response/follow up within the next 24 hours
- Need for additional resources (communications, crisis management, etc.) or assistance as required
- Media and/or agency presence

2. The Vice President responsible for the affected facility, plant or office shall determine the need for additional upward notification.

3. Within 8 hours, Plant Manager/designee is responsible for creating the NRG Energy Event Notification Form and distributing electronically.

4. If a work related incident involving an employee results any one of the following Cal/OSHA must be contacted verbally within 8 hours: death, hospitalization with treatment for more than 24 hours, loss of any member of the body (loss of bone) or permanent disfigurement (tissue damage). The Regional Safety Director is responsible for notifying Cal/OSHA.

5. If a work related on-site incident involving a contract employee or contractor results any one of the following, the contract/contractor company must notify Cal/OSHA verbally within 8 hours: death, hospitalization with treatment for more than 24 hours, loss of any member of the body (loss of bone) or permanent disfigurement (tissue damage). NRG safety will ensure that each company involved contacts OSHA accordingly.

6. If the event results in personal injury to an employee, employee's supervision will notify Core Injury Management (855-723-3674) immediately. If off-site treatment is provided, Supervision or Local Safety must notify Worker's Comp according to site specific procedures as soon as practical.

Serious Event Notification

This includes, but is not limited to, an injury or illness that is likely to be an OSHA recordable, fire/explosion or spill response by on-site emergency response personnel, off-site personal injury due to automobile collision or other events while on company business, property damage >$10,000 due to employee actions, OSHA or other agency inspections and near misses with potentially severe consequences (could reasonably have resulted in a fatality, injury or illness requiring surgery or hospitalization, fractures, amputation, etc.)

1. An event involving acute personal injury to an employee requires immediate notification to Core Injury Management (855-723-3674) by the employee's supervision. Supervision must also notify Worker's Comp according to site specific procedures as soon as practical if offsite treatment is provided.

2. Within eight (8) hours of a serous notification event, Plant Manager/designee will notify the Vice President responsible for the affected facility, plant or office and provide the following information:

- Names of injured individuals, company name if contractor, nature of injuries and on-site treatment provided
- Brief description of the incident
- Description of any off-site impact and actions taken
- Apparent cause(s) of the incident if obvious; do not speculate
- Immediate corrective actions
- Additional response/follow up within the next 24 hours if required
- Need for additional resources or assistance as required

● Media and/or agency presence

3. Within 24 hours, Plant Manager/designee is responsible for creating the NRG Energy Event Notification Form and distributing electronically. Within this same 24 hour period Plant Manager/designee will ensure an incident analysis is initiated, including the creation and distribution of an initial incident report.

Minor Incidents

This includes, but is not limited to, small cuts, scratches or bruises and near misses with minor severity potential. Employees must report these events as soon as practical but no later than the end of the work shift. If a NRG employee is injured, employee's supervision will contact Core Injury Management (855-723-3674) upon learning of the incident.

If at any time in the notification process the individual you are contacting is unavailable, move up to the next contact person in the process.

ADDENDUM 3

CECP

Emergency Evacuation Roster

Name	Signature

ADDENDUM 4

Plant Map and Evacuation Assembly Area

(See attachment at end of document)

ADDENDUM 5

(To be completed by the Environmental Specialist or a designee)

EMERGENCY RELEASE FOLLOW - UP NOTICE REPORTING FORM

A	BUSINESS NAME	FACILITY EMERGENCY CONTACT & PHONE NUMBER ( ) -
B	INCIDENT DATE MO DAY YR	TIME OES NOTIFIED (use 24 hr time)
		OES CONTROL NO.
C	INCIDENT ADDRESS LOCATION	CITY / COMMUNITY
		COUNTY ZIP
D	CHEMICAL OR TRADE NAME (print or type)	CAS Number
	CHECK IF CHEMICAL IS LISTED IN 40 CFR 355, APPENDIX A ☐	CHECK IF RELEASE REQUIRES NOTIFI - CATION UNDER 42 U.S.C. Section 9603 (a) ☐
	PHYSICAL STATE CONTAINED ☐ SOLID ☐ LIQUID ☐ GAS	PHYSICAL STATE RELEASED ☐ SOLID ☐ LIQUID ☐ GAS
		QUANTITY RELEASED
	ENVIRONMENTAL CONTAMINATION ☐ AIR ☐ WATER ☐ GROUND ☐ OTHER	TIME OF RELEASE
		DURATION OF RELEASE ___DAYS ___HOURS ___MINUTES
E	ACTIONS TAKEN	
F	KNOWN OR ANTICIPATED HEALTH EFFECTS (Use the comments section for addition information) ☐ ACUTE OR IMMEDIATE (explain) _____ ☐ CHRONIC OR DELAYED (explain) _____ ☐ NOTKNOWN (explain)	
G	ADVICE REGARDING MEDICAL ATTENTION NECESSARY FOR EXPOSED INDIVIDUALS	
H	COMMENTS (INDICATE SECTION (A - G) AND ITEM WITH COMMENTS OR ADDITIONAL INFORMATION)	
I	CERTIFICATION: I certify under penalty of law that I have personally examined and I am familiar with the information submitted and believe the submitted information is true, accurate, and complete. REPORTING FACILITY REPRESENTATIVE (print or type) _____ SIGNATURE OF REPORTING FACILITY REPRESENTATIVE _____ DATE: _____	

Instructions for Emergency Release Follow-Up Notice Reporting Form

GENERAL INFORMATION:

Chapter 6.95 of Division 20 of the California Health and Safety Code requires that written emergency release follow-up notices prepared pursuant to 42 U.S.C. § 11004, be submitted using this reporting form. Non-permitted releases of reportable quantities of Extremely Hazardous Substances (listed in 40 CFR 355, appendix A) or of chemicals that require release reporting under section 103(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 [42 U.S.C. § 9603(a)] must be reported on the form, as soon as practicable, but no later than 30 days, following a release. The written follow-up report is required in addition to the verbal notification.

BASIC INSTRUCTIONS:

- The form, when filled out, reports follow-up information required by 42 U.S.C § 11004. Ensure that all information requested by the form is provided as completely as possible.
- If the incident involves reportable releases of more than one chemical, prepare one report form for each chemical released.
- If the incident involves a series of separate releases of chemical(s) at different times, the releases should be reported on separate reporting forms.

SPECIFIC INSTRUCTIONS:

Block A: Enter the name of the business and the name and phone number of a contact person who can provide detailed facility information concerning the release.

Block B: Enter the date of the incident and the time that verbal notification was made to OES. The OES control number is provided to the caller by OES at the time verbal notification is made. Enter this control number in the space provided.

Block C: Provide information pertaining to the location where the release occurred. Include the street address, the city or community, the county and the zip code.

Block D: Provide information concerning the specific chemical that was released. Include the chemical or trade name and the Chemical Abstract Service (CAS) number. Check all categories that apply. Provide best available information on quantity, time and duration of the release.

Block E: Indicate all actions taken to respond to and contain the release as specified in 42 U.S.C. § 11004(c).

Block F: Check the categories that apply to the health effects that occurred or could result from the release. Provide an explanation or description of the effects in the space provided. Use Block H for additional comments/information if necessary to meet requirements specified in 42 U.S.C. § 11004(c).

Block G: Include information on the type of medical attention required for exposure to the chemical released. Indicate when and how this information was made available to individuals exposed and to medical personnel, if appropriate for the incident, as specified in 42 U.S.C. § 11004(c).

Block H: List any additional pertinent information.

Block I: Print or type the name of the facility representative submitting the report. Include the official signature and the date that the form was prepared.

MAIL THE COMPLETED REPORT TO:

Chemical Emergency Planning and Response Commission (CEPRC) /
Local Emergency Planning Committee (LEPC)
Attn: Section 304 Reports, 3650 Schriever Avenue, Mather, CA 95655

ADDENDUM 6

Emergency Equipment Locations

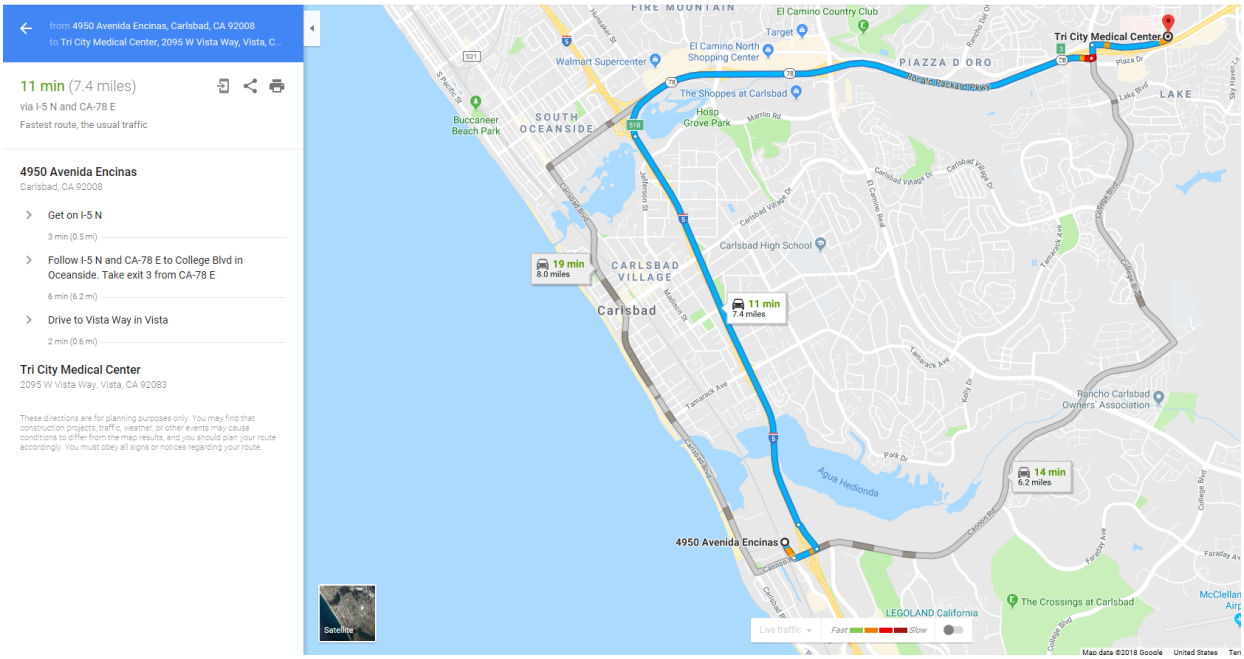
(See attachment at end of document)

ADDENDUM 7

Map to the Nearest Hospital

Tri-City Medical Center
2095 W. Vista Way
Vista, CA 92083
(760) 724-8411

Driving direction from the CECP:



ADDENDUM 8

Revisions History

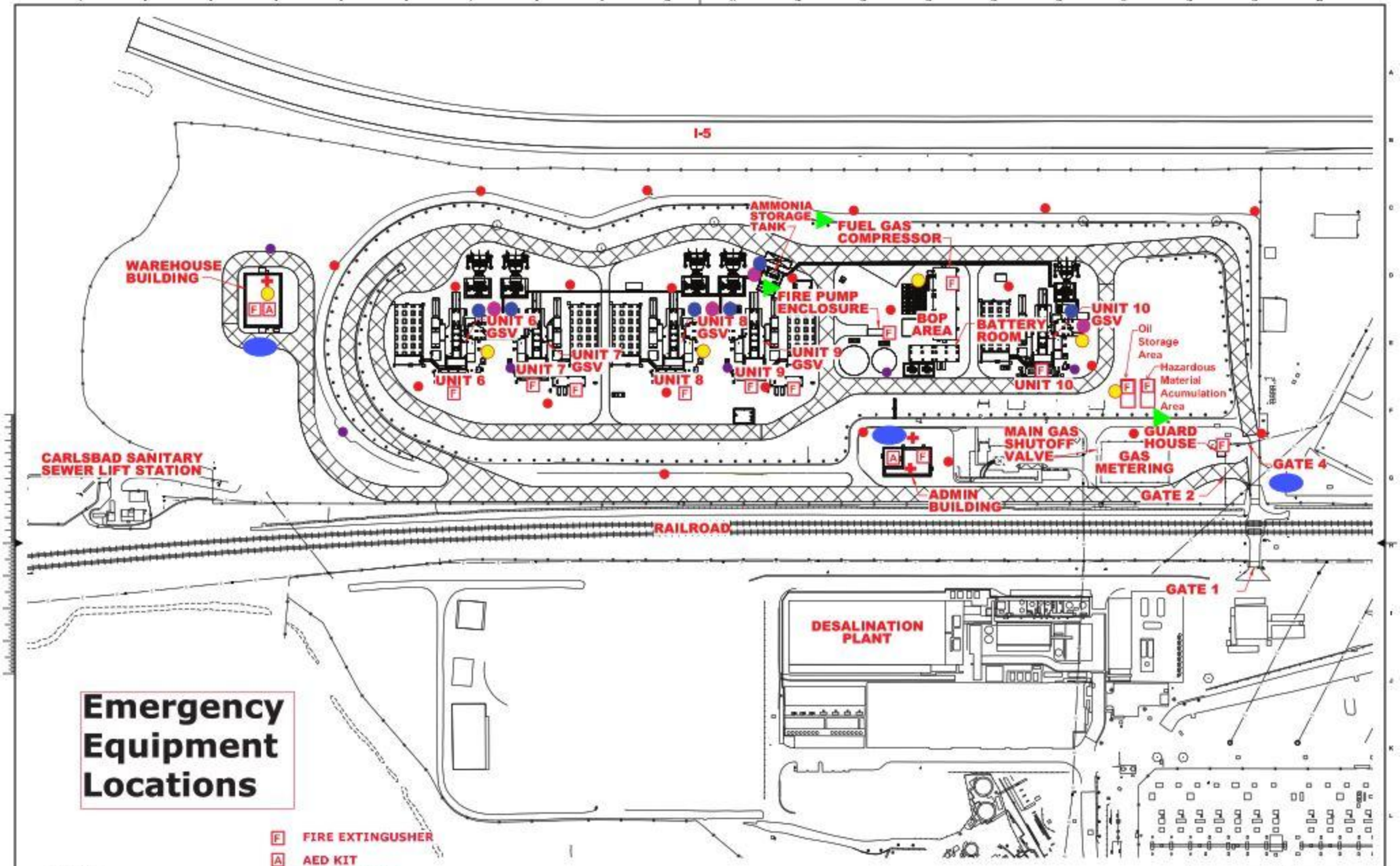
Date	Person made revision	Reason
3/27/2018	Paul Mattesich	Initial Draft
6/26/2018	Scott Seipel	Revisions based on CEC Review
10/15/2020	Ryan Goerl	Revisions to notifications in several sections. Updates to contact numbers, PA system updates, communication clarifications, Encina demolition activities
8/13/2021	Ryan Goerl	Added Ammonia release section. Changed media reporting language. Updated contact numbers.
10/11/21	Paul Mattesich	Replaced Ryan Goerl with Paul Mattesich on interim basis during job vacancy
2/3/22	Paul Mattesich	Updated phone numbers, added bomb threat checklist, severe wind checklist
7/5/2022	Paul Mattesich	Added Ryan Stewart
2/2/2023	Ryan J. Stewart	Updated phone numbers and contact information
2/16/2024	Ryan J. Stewart	Updated phone numbers and contact information
3/5/2024	Ryan J. Stewart	Revisions based on CUPA review
5/9/2024	Ryan J. Stewart	Updated to include SDS for aqueous ammonia per 2024 Compliance Audit recommendation
2/12/2025	Ryan J. Stewart	Updated phone numbers and contact information Removed Brian Wood as O&M Manager
3/10/2025	Ryan J. Stewart	Added Marcin Sobczyk as O&M Manager

ADDENDUM 9

Locations of Hardcopies of the Emergency Action Plan

- Control Room under the phone
- Control Room bookcase
- Plant Manager’s Office
- O&M Supervisor’s Office
- Environmental Specialist’s Office
- Local Fire Department

Carlsbad Energy Center Project
Emergency Equipment Location Map



Emergency Equipment Locations

LEGEND

- POTABLE WATER
- RECYCLED WATER
- GSV — GAS SHUTOFF VALVE
- BOP — BALANCE OF PLANT
- F — FIRE EXTINGUSHER
- A — AED KIT
- FIRST AID KIT
- OIL SPILL KIT
- AMMONIA SPILL KIT
- EYE WASH STATION
- Wind Sock
- Assembly Area

ISSUED FOR REVIEW

no.	date	by	chkd	description
E	10/24/18	RLS		ISSUED FOR REVIEW
D	10/27/18	RLS		ISSUED FOR REVIEW
C	11/15/18	RLS		ISSUED FOR REVIEW
B	12/14/17	RLS		ISSUED FOR REVIEW
A	12/5/17	RLS		ISSUED FOR REVIEW

nrg.
NRG ENERGY, INC
SAN DIEGO COUNTY, CA

Emergency Equipment Locations

project: 88184 | contract:

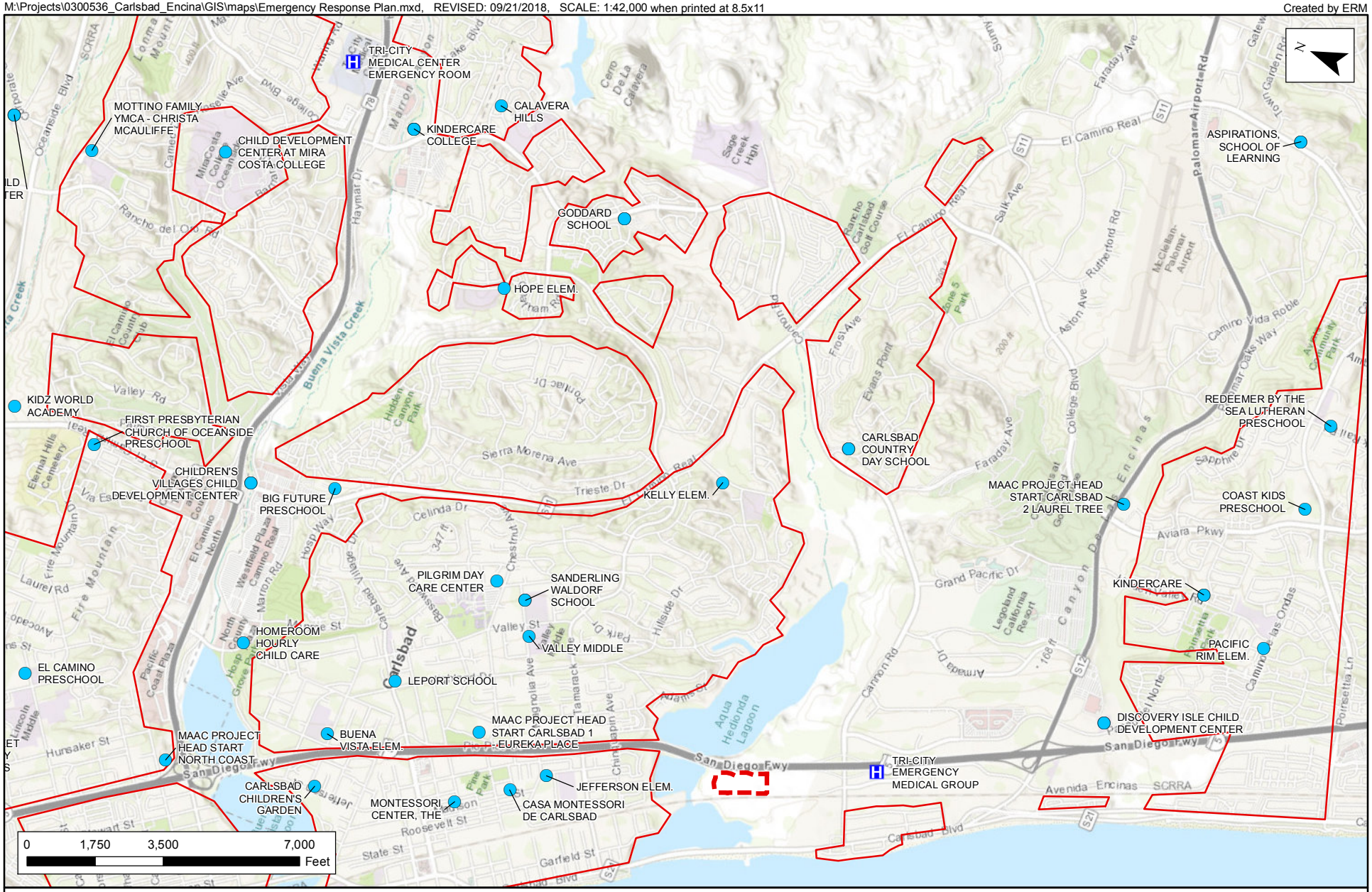
drawing: SKCS053 – | rev: E

sheet: | of: | sheets:

88184SKCS053.dgn

Carlsbad California
Population Centers Map
&
City of Carlsbad Fire Department
Fire Station Locations Map

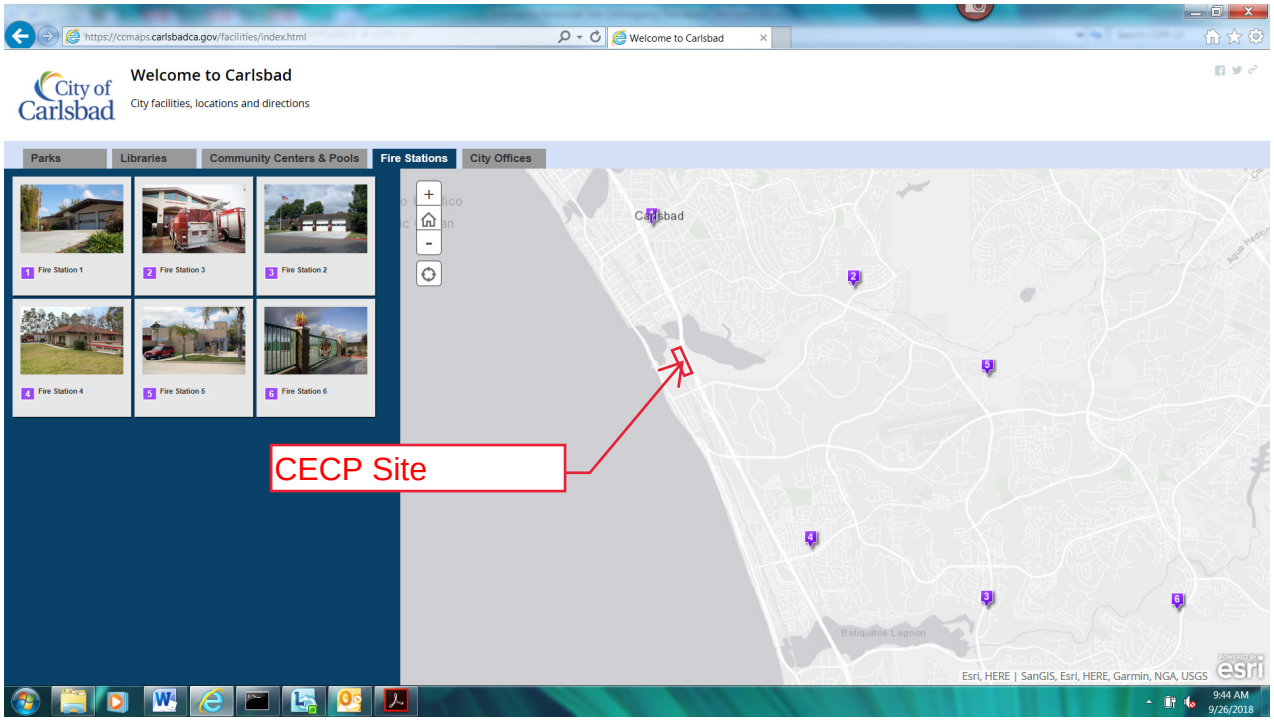
M:\Projects\0300536_Carlsbad_Encina\GIS\maps\Emergency Response Plan.mxd, REVISED: 09/21/2018, SCALE: 1:42,000 when printed at 8.5x11 Created by ERM



Legend

- Sensitive Receptor
- Emergency Service
- Population Center
- Project Boundary

Source: Esri - World Imagery; NAD 1983 StatePlane California VI FIPS 0406 Feet



Carlsbad Energy Center Project
City of Carlsbad Fire Department
Fire Station Locations

Carlsbad Energy Center Project
Plant Map and
Evacuation Assembly Areas

EQUIPMENT IDENTIFICATION AND LOCATION LIST																			
DWG REF	DESCRIPTION VIEW SITE EQUIPMENT	DWG REF	DESCRIPTION VIEW SITE EQUIPMENT	DWG REF	DESCRIPTION VIEW SITE EQUIPMENT	DWG REF	DESCRIPTION VIEW SITE EQUIPMENT	DWG REF	DESCRIPTION VIEW SITE EQUIPMENT	DWG REF	DESCRIPTION VIEW SITE EQUIPMENT	DWG REF	DESCRIPTION VIEW SITE EQUIPMENT	DWG REF	DESCRIPTION VIEW SITE EQUIPMENT	DWG REF	DESCRIPTION VIEW SITE EQUIPMENT	DWG REF	DESCRIPTION VIEW SITE EQUIPMENT
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202	[illegible]	231	[illegible]	260	[illegible]	289	[illegible]	318	[illegible]	347	[illegible]	376	[illegible]	405	[illegible]	434	[illegible]	463	[illegible]
203	[illegible]	232	[illegible]	261	[illegible]	290	[illegible]	319	[illegible]	348	[illegible]	377	[illegible]	406	[illegible]	435	[illegible]	464	[illegible]
204	[illegible]	233	[illegible]	262	[illegible]	291	[illegible]	320	[illegible]	349	[illegible]	378	[illegible]	407	[illegible]	436	[illegible]	465	[illegible]
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212	[illegible]	241	[illegible]	270	[illegible]	299	[illegible]	328	[illegible]	357	[illegible]	386	[illegible]	415	[illegible]	444	[illegible]	473	[illegible]
213	[illegible]	242	[illegible]	271	[illegible]	300	[illegible]	329	[illegible]	358	[illegible]	387	[illegible]	416	[illegible]	445	[illegible]	474	[illegible]
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223	[illegible]	252	[illegible]	281	[illegible]	310	[illegible]	339	[illegible]	368	[illegible]	397	[illegible]	426	[illegible]	455	[illegible]	484	[illegible]
224	[illegible]	253	[illegible]	282	[illegible]	311	[illegible]	340	[illegible]	369	[illegible]	398	[illegible]	427	[illegible]	456	[illegible]	485	[illegible]
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228	[illegible]	257	[illegible]	286	[illegible]	315	[illegible]	344	[illegible]	373	[illegible]	402	[illegible]	431	[illegible]	460	[illegible]	489	[illegible]
229	[illegible]	258	[illegible]	287	[illegible]	316	[illegible]	345	[illegible]	374	[illegible]	403	[illegible]	432	[illegible]	461	[illegible]	490	[illegible]

* INDICATES APPROXIMATE FLOOR ELEVATION ABOVE ADJACENT GRADE. IF NOT OTHERWISE INDICATED FLOOR OR TOP OF CONCRETE ELEVATION TO BE APPROXIMATE 33 FEET ABOVE ADJACENT GRADE

EQUIPMENT IDENTIFICATION AND LOCATION LIST					
	NAD83 STATE PLANE COORDINATES				
POINT REF	DESCRIPTION	NORTHING	EASTING	TOC ELEVATION	
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	
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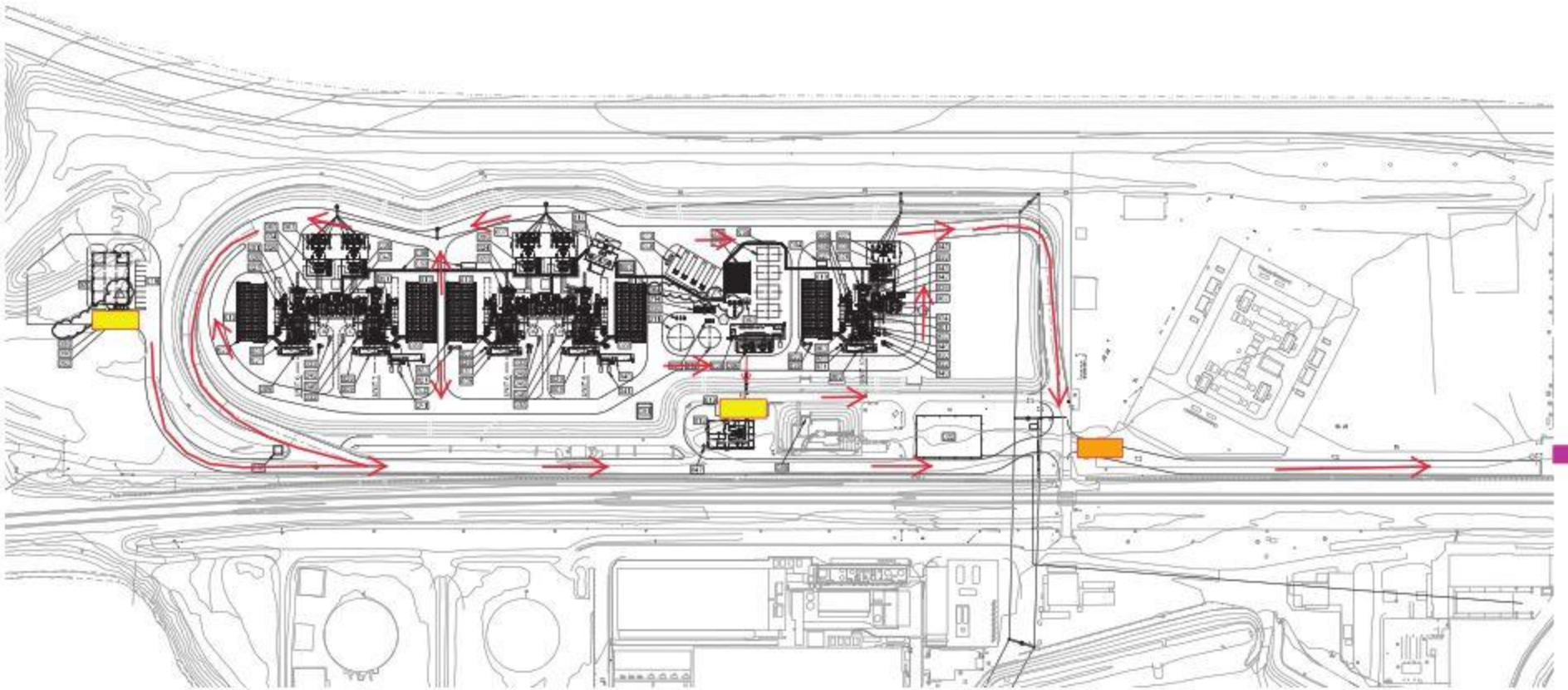
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	

EQUIPMENT IDENTIFICATION AND LOCATION LIST			
	PROJECT PLANT COORDINATES		
POINT REF	PLANT NORTHING	PLANT EASTING	TOC ELEVATION
[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]



PLAN VIEW
NOT TO SCALE

TRUE NORTH
PLANT NORTH

Primary Evacuation Areas
Secondary Evacuation Areas
Tertiary Evacuation Areas

Plant Map and Evacuation Assembly Areas

4	[illegible]	RCG		ISSUED FOR ESTIMATING				
3	[illegible]	RCG		ISSUED FOR OWNER COMMENTS				
2	[illegible]	RCG		REVISED FOR OWNER COMMENTS	7	[illegible]	RCG	REVISED PER EQUIPMENT LOCATION
1	[illegible]	RCG		ISSUED FOR OWNER REVIEW	6	[illegible]	RCG	REVISED PER OWNER COMMENTS - ISSUED FOR CONTRACT
0	[illegible]	MAC		ISSUE FOR CONTRACT	5	[illegible]	RCG	ISSUE FOR CONTRACT

no.	date	by	chk'd	description	no.	date	by	chk'd	description

CARLSBAD POWER CONSULTING

[illegible]

Designed: [illegible]
Drawn: [illegible]

nrg.
NRG ENERGY, INC.
SAN DIEGO COUNTY, CA

CARLSBAD ENERGY CENTER
CARLSBAD SIMPLE CYCLE
SITE ARRANGEMENT

project no. [illegible]
drawing no. SA1000 — 7
sheet [illegible] of [illegible]
file name: [illegible].dwg

Carlsbad Energy Center Hazardous Materials and Waste Training Plan

1. Staff list and HazMat Role – Personnel Up to Date as of February 2025:

Paul Mattesich – Plant Manager: Manages all staff, assigns Hazardous Materials duties, ensures training occurs per regulations, submits Hazardous Materials Business Plan.

Marcin Sobczyk – Operations Manager: Manages Operations and Maintenance Staff, handles hazardous materials (IE service oil, sodium hypochlorite totes).

Anthony Kalis – Engineer: Handles some hazardous materials (IE service oil, sodium hypochlorite totes).

David Brown – Business Manager: No active hazardous materials role

Ryan Stewart – Environmental, Health, and Safety Specialist: Manages hazmat programs, signs manifests for shipped wastes, tracks waste, conducts inspections, labeling, remote drums.

Patricia Hurtado – Plant Clerk: Secondary for hazmat programs, signs manifests for shipped wastes, tracks waste, conducts inspections, labeling, remote drums.

Aaron Siegel – Operations/Maintenance Technician: Forklift certified, handles hazardous materials (IE service oil, sodium hypochlorite totes).

Jeff Ryan – Operations/Maintenance Technician: Forklift certified, handles hazardous materials (IE service oil, sodium hypochlorite totes).

Craig Lobo – Operations/Maintenance Technician: Forklift certified, handles hazardous materials (IE service oil, sodium hypochlorite totes).

Greg Munsell – Operations/Maintenance Technician: Forklift certified, handles hazardous materials (IE service oil, sodium hypochlorite totes).

Rob Burton – Operations/Maintenance Technician: Forklift certified, handles hazardous materials (IE service oil, sodium hypochlorite totes).

Kyle Campbell – Operations/Maintenance Technician: Forklift certified, handles hazardous materials (IE service oil, sodium hypochlorite totes).

Shawn Reilly – Operations/Maintenance Technician: Forklift certified, handles hazardous materials (IE service oil, sodium hypochlorite totes).

Ben Miller – Operations/Maintenance Technician: Forklift certified, handles hazardous materials (IE service oil, sodium hypochlorite totes).

Hamid Hadidi – Instrumentation, Electrician Technician: Forklift certified, handles hazardous materials (IE service oil, sodium hypochlorite totes).

Robert Haman – Instrumentation, Electrician Technician: Forklift certified, handles hazardous materials (IE service oil, sodium hypochlorite totes).

Scott Edwards – Total Western Warehouse Contractor: Forklift certified, primary driver for loading drums to shipper, handles hazardous materials (IE service oil, sodium hypochlorite totes), handles hazardous wastes.

2. Provided Training:

2.1 All NRG staff is given the following training.

2.1.1 Annual:

- HMBP Training: All required elements in HMBP rules, HazMat emergency response, fire response, wildlife response, evacuation, elements of SPCC, Satisfies RMP training requirements.
- Emergency Response (Site Specific): Emergency Action Plan, Evacuation, Medical Emergencies, High Winds, Terrorism, Sabotage, system failures, Earthquake.
- Emergency Response (NRG Provided): NRG Provided Online Training
- Site Orientation: General site overview, active shooter, HazMat spill response, emergency contacts, wildlife requirements.
- SPCC Training (Site Specific): Classroom and presentation based.
- Fire Fighting: Online Training and Hands On
- Lead Awareness: NRG Provided Online Training
- Hexavalent Chromium Control: NRG Provided Online Training
- Asbestos Awareness: NRG Provided Online Training
- Ammonia Safety: NRG Provided Online Training
- Job Briefing: NRG Provided Online Training. Includes HazMat analysis/spill potential prior to work.
- Materials of Trade: NRG Provided Online Training
- HAZWOPER Awareness: NRG Provided Online Training
- Incident and Injury Reporting: NRG Provided Online Training
- Hazard Recognition: NRG Provided Online Training.
- General PPE Awareness: NRG Provided Online Training

2.1.2 Every 2 Years

- CPR/First-Aid Certification

2.1.3 Every 3 Years

- DOT Function Specific (Loading and Unloading of Hazardous Materials): NRG Provided Online Training, includes separate exam.
- DOT Safety: NRG Provided Online Training, includes separate exam.
- DOT General Awareness (Transportation of Hazardous Materials): NRG Provided Online Training, includes separate Exam.
- DOT Security Awareness: NRG Provided Online Training
- Site Specific RMP training: Stand-alone done every three years but is covered by “HMBP Training” annually.

2.2 Training for EHS and Plant Clerk:

- Both are HAZWOPPER 40 Hour trained.

2.2.1 Annual:

- Lion Technology Inc. California Hazardous Waste Management Course: online or in person

2.2.2 Every 3 Years:

- Lion Technology Inc. Recurrent Hazmat Ground Shipper Certification (DOT)

California Environmental Reporting System (CERS)

Aboveground Petroleum Storage Act - Facility Information Report

Facility/Site

Carlsbad Energy Center Project
4950 Avenida Encinas
Carlsbad, CA 92008

CERS ID
10765651

CAR000256545

Submittal Status

Submitted on 2/13/2025 by *Ryan Stewart* of Carlsbad Energy Center Project (Carlsbad, CA)

APSA Facility Information

Conditionally Exempt APSA Tank Facility
N

Date Of SPCC Plan Certification or Date of 5-Year Review
1/18/2023

Total Aboveground Storage Capacity of Petroleum	Number of Tanks in Underground Area(s)
41435	0

UNIFIED PROGRAM CONSOLIDATED FORM
ABOVEGROUND PETROLEUM STORAGE ACT
TANK FACILITY STATEMENT

I. IDENTIFICATION

FACILITY NAME (Same as BUSINESS NAME or DBA-Doing Business As) 3		FACILITY PHONE 102
Carlsbad Energy Center LLC		760-710-3950
FACILITY ADDRESS 103		
4950 Avenida Encinas		
FACILITY CITY 104		ZIP CODE 105
Carlsbad	CA	92008
CONTACT NAME 117a		CONTACT PHONE 118a
Ryan J. Stewart		760-710-3943

II. TOTAL FACILITY STORAGE CAPACITY

Facility's total aboveground petroleum storage capacity (in gallons) for all tanks and containers, including tanks in an underground area, with a shell capacity greater than or equal to 55 gallons (see reverse for instructions):	937 41,435 gallons

III. TANK AND CONTAINER DETAILS

Details of each aboveground petroleum storage tank and container greater than 10,000 gallons in shell capacity (attach additional forms if needed)

938 Tank or Container ID Number	939 Contents (Gas, Diesel, etc.)	940 Shell Capacity (in gallons)	941 Location of Tank or Container

IV. SIGNATURE

CERTIFICATION: I certify under penalty of law that the information provided herein is accurate and complete to the best of my knowledge.

SIGNATURE OF TANK FACILITY OWNER OR OPERATOR	PRINT NAME OF TANK FACILITY OWNER OR OPERATOR	DATE (MM/DD/YYYY)
	Paul Mattesich	02 / 13 / 2025

Aboveground Petroleum Storage Act: Tank Facility Statement Instructions

Each owner or operator of a tank facility that is subject to the Aboveground Petroleum Storage Act (APSA) is required to submit a Tank Facility Statement annually into the California Environmental Reporting System (CERS). A Hazardous Materials Business Plan (HMBP) submittal into CERS satisfies the requirement to file the Tank Facility Statement.

A tank facility is subject to APSA if any of the following apply:

(a) The tank facility is subject to the oil pollution prevention regulations specified in Part 112 (commencing with §112.1) of Subchapter D of Chapter I of Title 40 of the Code of Federal Regulations; **OR**

(b) The tank facility has a storage capacity of 1,320 gallons or more of petroleum; **OR**

(c) The tank facility has a storage capacity of less than 1,320 gallons of petroleum **AND** has one or more tanks in an underground area (TIUGAs) meeting the conditions specified in paragraph (1) of subdivision (o) of HSC §25270.2. If this subdivision is applicable, only tanks meeting the conditions specified in paragraph (1) of subdivision (o) of HSC §25270.2 shall be included as storage tanks and subject to APSA.

I. FACILITY INFORMATION

3. FACILITY NAME – Enter the full legal name of the tank facility. (Same as BUSINESS NAME or DBA–Doing Business As.)
102. FACILITY PHONE - Enter the phone number, area code first, and any extension.
103. FACILITY ADDRESS – Enter the street address where the tank facility is located. No post office box numbers are allowed. This information must provide a means to locate the facility geographically.
104. CITY – Enter the city or unincorporated area in which the tank facility is located.
105. ZIP CODE – Enter the zip code of the tank facility. The extra 4 digit zip code may also be added.
117a. CONTACT NAME – Enter the name of the person, who receives aboveground storage tank correspondences.
118a. CONTACT PHONE – Enter the phone number, area code first, and any extension.

II. TOTAL FACILITY STORAGE CAPACITY

937. TOTAL FACILITY STORAGE CAPACITY – Enter the facility's total aboveground petroleum storage tank capacity (in gallons). Using the table below, enter the **shell capacity** of each aboveground petroleum storage tank and container, including each TIUGA, greater than or equal to 55 gallons. Do not enter the actual volume stored in the tank. To calculate the capacity of 55 gallon drums on site, use the **maximum** number of drums that would typically be stored at your facility.

Total Facility Storage Capacity (in gallons) = A + B + C

Total Facility Storage Capacity *in gallons* = Sum of Shell Capacity of All Aboveground Petroleum Storage Tanks and Containers (≥55 gallons) (e.g., 6 X 55 gal. = 330 gal.; 1 X 2,000 gal. = 2,000 gal.; 1 X 10,000 gal. = 10,000 gal.; Total = 330 + 2,000 + 10,000 = 12,330 gallons)					
A		B		C	
42 x 55 gal.	= 2,310	____ x 1,000 gal.	=	5 x 45 gal.	= 225
____ x 100 gal.	=	____ x 2,000 gal.	=	5 x 120 gal.	= 600
____ x 250 gal.	=	5 x 7,400 gal.	= 37,000	____ x ____ gal.	=
1 x 500 gal.	= 500	5 x 160 gal.	= 800	____ x ____ gal.	=
Subtotal A = 2,810 gallons		Subtotal B = 37,800 gallons		Subtotal C = 825 gallons	

III. TANK AND CONTAINER DETAILS

Provide details of each aboveground petroleum storage tank and container greater than 10,000 gallons in shell capacity (attach additional forms if needed) at your facility. If your facility does not have an aboveground storage tank or container with shell capacity greater than 10,000 gallons, you can skip data fields 938 – 941.

938. TANK OR CONTAINER ID NUMBER – Enter a unique identification number for each aboveground petroleum storage tank and container at your facility. You may create your own numbering system.
939. CONTENTS – Enter the contents (i.e. DIESEL, GASOLINE, OIL, etc.) of each aboveground petroleum storage tank and container at your facility.
940. SHELL CAPACITY – Enter the shell capacity (in gallons) of each aboveground petroleum storage tank and container at your facility.
941. LOCATION OF TANK OR CONTAINER – Enter the general location of each aboveground petroleum storage tank or container at your facility (e.g., at north end of facility; inside maintenance shop).

IV. SIGNATURE

SIGNATURE OF TANK FACILITY OWNER OR OPERATOR – The form must be signed, in the space provided, by the owner or operator.
PRINT NAME OF TANK FACILITY OWNER OR OPERATOR – Print or type the full name of the person signing the form.
DATE – Enter the date (MM/DD/YYY) the form was signed.

DEFINITIONS

TANK FACILITY – Any one or more aboveground storage tanks, including any piping that is integral to the tanks that **contain petroleum** and that are used by an owner or operator at a single location or site.
ABOVEGROUND STORAGE TANK (AST) – A tank (or container) with the capacity to store 55 gallons or more of petroleum that is substantially or totally above the surface of the ground, including a TIUGA. Some AST exceptions exist; they are specified in HSC §25270.2(a). An AST includes drums, totes, oil-filled operational or manufacturing equipment, etc.
PETROLEUM – Crude oil, or a fraction thereof, that is liquid at 60°F temperature and 14.7 pounds per square inch absolute pressure. Petroleum includes gasoline, diesel, E85, motor oil, waste oil, etc., but does NOT include antifreeze, propane, or natural gas.
STORAGE **–** Containment, handling, or treatment of petroleum, for any period of time, including standby storage, seasonal storage, and temporary storage.
STORAGE CAPACITY (of a facility) **–** The aggregate shell capacity of all aboveground storage tanks (including containers 55 gallons and greater) at a tank facility. For example, if a facility has two 500-gallon capacity diesel ASTs and a 600-gallon capacity waste oil AST, but only keeps each AST half full, then the storage capacity for this facility is 1,600 gallons (calculated by adding the shell capacity of each tank/container).

Attachment C HAZ-8: Contractor Verification Statement

Carlsbad Energy Center LLC
4950 Avenida Encinas
Carlsbad, CA 92008
Phone: 760-710-3970

March 17, 2025

Subject: CARLSBAD ENERGY CENTER COM-8 REPORT – HAZ-8: Contractor Verification Statement

The Carlsbad Energy Center Project takes the following actions to maintain compliance with the requirements in HAZ-8:

- All NRG employees at CECP undergo a background check in the onboarding process.
- Contractors are vetted by the NRG and Clearway procurement through the Coupa Supplier Information Management (SIM) portal for vendor registration and screening process. Vendors must complete and maintain current Coupa SIM status before the contractor is allowed to conduct work at CECP.

Attachment D **SOIL&WATER-4: EPS Water Reports**
EPS NPDES Permit No. CA0001350 was terminated in December 2021 – Last day of Discharge was June 30, 2021
Report no longer available or required

Attachment E SOIL&WATER-5: Potable Water Statement

Carlsbad Energy Center LLC
4950 Avenida Encinas
Carlsbad, CA 92008
Phone: 760-710-3970

March 17, 2025

Subject: CARLSBAD ENERGY CENTER COM-8 REPORT – SOIL&WATER-5: Potable Water Statement

To date, the City of Carlsbad has not required or requested any water quality monitoring reports related to the potable water system.

Attachment F SOIL&WATER-6: Water Use Report

Carlsbad Energy Center LLC
4950 Avenida Encinas
Carlsbad, CA 92008
Phone: 760-710-3970

March 17, 2025

Subject: CARLSBAD ENERGY CENTER COM-8 REPORT – SOIL&WATER-6: Potable Water Use

Attached is a report of Carlsbad Energy Center's Title 22 and potable water use for 2024. Due to the level of details given on the monthly potable water bills, only daily averages are able to be given in this report.

2024 Water Usage By Type

Emergency Water Use:		
Month	Gallons	Acre-Feet
Jan-24	0	0
Feb-24	0	0
Mar-24	0	0
Apr-24	0	0
May-24	0	0
Jun-24	0	0
Jul-24	0	0
Aug-24	0	0
Sep-24	0	0
Oct-24	0	0
Nov-24	0	0
Dec-24	0	0

Title 22 Water Use				
Month	Total (gal)	Daily Average (gal)	Daily Max (gal)	Total (Acre-Feet)
Jan-24	795,872.00	25,673.29	157,626.96	2.44
Feb-24	489,940.00	16,894.48	156,328.44	1.50
Mar-24	347,072.00	11,195.87	157,674.40	1.07
Apr-24	513,128.00	17,104.27	141,718.01	1.57
May-24	382,976.00	12,354.06	153,980.45	1.18
Jun-24	731,544.00	24,384.80	178,697.34	2.25
Jul-24	1,710,676.00	55,183.10	180,918.77	5.25
Aug-24	1,299,276.00	41,912.13	174,630.80	3.99
Sep-24	739,772.00	24,659.07	139,809.84	2.27
Oct-24	987,360.00	31,850.32	163,329.96	3.03
Nov-24	885,632.00	29,521.07	187,913.68	2.72
Dec-24	891,616.00	28,761.81	217,237.39	2.74
Total	9,774,864.00			30.00

Potable Water Use				
Month	Total (gal)	Daily Average (gal)	Total (gal) Encina Demolition	Total (Acre-Feet)
Jan-24	26,928.00	868.65		0.08
Feb-24	14,960.00	515.86		0.05
Mar-24	30,668.00	989.29		0.09
Apr-24	24,684.00	822.80		0.08
May-24	34,408.00	1,109.94		0.11
Jun-24	103,972.00	3,465.73		0.32
Jul-24	41,888.00	1,351.23		0.13
Aug-24	39,644.00	1,278.84		0.12
Sep-24	19,448.00	648.27		0.06
Oct-24	21,692.00	699.74		0.07
Nov-24	23,188.00	772.93		0.07
Dec-24	20,944.00	675.61		0.06

Fire Water Lines				
Meter	Total (gal)	Monthly Average (gal)	Daily Average (gal)	Total (Acre-Feet)
2"	2,244.00	187.00	6.15	0.01
8"	5,984.00	498.67	16.39	0.02

Total 2024 Potable		
	CECP	**Encina Demoiltion**
Gallons:	410,652.00	-
Acre-Feet:	1.26	-

Attachment G SOIL&WATER-7: Wastewater Quality Monitoring Reports

January 29, 2024

Carlsbad Energy Center LLC
4950 Avenida Encinas
Carlsbad, CA 92008
Phone: 760-710-3970

Mr. William Svec
Compliance Project Manager
Encina Wastewater Authority
6200 Avenida Encinas
Carlsbad, California 92011

RE: CARLSBAD ENERGY CENTER PROJECT, FIRST QUARTER OF 2024 WASTE WATER SAMPLES

Dear Mr. Svec:

Carlsbad Energy Center LLC ("Project Owner") submits the required samples results for the First Quarter of 2024 (1Q2024). This report is submitted in compliance with the table in condition 2 of permit number 2405. The samples were taken on January 9, 2024. The following table summarizes the results:

			Results		
Constituent	Limit	Units	Sample Point 1	Sample Point 2	Notes
Oil and Grease (HEM)	400	mg/L	ND	ND	ND: Not Detected or below the MDL
pH	5.5-12		7.39	7.53	

If you have any questions or comments, please do not hesitate to contact Paul Mattesich at (760) 710-3945.

Sincerely,

Paul Mattesich
Plant Manager
Carlsbad Energy Center LLC

Attached: EWA Report Certification dated January 29, 2024
Eurofins Calscience Analytical Report EWA Waste Water Permit – January 18, 2024
Carlsbad Energy Center pH Meter Calibration & Analysis – January 9, 2024

Cc: File

ENCINA WASTEWATER AUTHORITY

6200 AVENIDA ENCINAS, CARLSBAD, CA 92011-0195 TEL:(760)438-3941 FAX:(760)476-9852

REPORT CERTIFICATION

I. INDUSTRIAL USER INFORMATION:

Carlsbad Energy Center LLC
Industrial User Name

4950 Avenida Encinas	Carlsbad	92008	760-710-3943
Facility Address	City	Zip Code	(Area Code) Phone

Carlsbad Energy Center LLC
Owner

Paul Mattesich	Plant Manager
IU Contact	Title

City of Carlsbad	2405
Member Agency	Permit #

II. CERTIFICATION STATEMENT:

All applications, reports or information submitted to the Encina Wastewater Authority must include the following certification statement and be signed as required by a responsible corporate officer, President, Vice President, Manager, CEO or an authorized representative.

CERTIFICATION STATEMENT

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

Paul Mattesich	1/29/24	CARLSBAD
PRESIDENT/VP/GENERAL MGR/CEO (Print and sign name)	DATE	CITY OR COUNTY

eurofins | Environment Testing

ANALYTICAL REPORT

PREPARED FOR

Attn: Anthony Kalis
Carlsbad Energy Center
4950 Avenida Encinas
Carlsbad, California 92008

Generated 1/18/2024 8:32:55 AM

JOB DESCRIPTION

EWA Waste Water Permit

JOB NUMBER

570-167417-1

Eurofins Calscience
2841 Dow Avenue, Suite 100
Tustin CA 92780

See page two for job notes and contact information.

Job Notes

This report may not be reproduced except in full, and with written approval from the laboratory. The results relate only to the samples tested. For questions please contact the Project Manager at the e-mail address or telephone number listed on this page.

The test results in this report relate only to the samples as received by the laboratory and will meet all requirements of the methodology, with any exceptions noted. This report shall not be reproduced except in full, without the express written approval of the laboratory. All questions should be directed to the Eurofins Calscience Project Manager.

Authorization

Generated
1/18/2024 8:32:55 AM

Authorized for release by
Rossina Tomova, Project Manager I
Rossina.Tomova@et.eurofinsus.com
(657)210-6367

Table of Contents

Definitions/Glossary

Client: Carlsbad Energy Center
Job ID: 570-167417-1
Project/Site: EWA Waste Water Permit

Glossary

Abbreviation	These commonly used abbreviations may or may not be present in this report.
¤	Listed under the "D" column to designate that the result is reported on a dry weight basis
%R	Percent Recovery
CFL	Contains Free Liquid
CFU	Colony Forming Unit
CNF	Contains No Free Liquid
DER	Duplicate Error Ratio (normalized absolute difference)
Dil Fac	Dilution Factor
DL	Detection Limit (DoD/DOE)
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample
DLC	Decision Level Concentration (Radiochemistry)
EDL	Estimated Detection Limit (Dioxin)
LOD	Limit of Detection (DoD/DOE)
LOQ	Limit of Quantitation (DoD/DOE)
MCL	EPA recommended "Maximum Contaminant Level"
MDA	Minimum Detectable Activity (Radiochemistry)
MDC	Minimum Detectable Concentration (Radiochemistry)
MDL	Method Detection Limit
ML	Minimum Level (Dioxin)
MPN	Most Probable Number
MQL	Method Quantitation Limit
NC	Not Calculated
ND	Not Detected at the reporting limit (or MDL or EDL if shown)
NEG	Negative / Absent
POS	Positive / Present
PQL	Practical Quantitation Limit
PRES	Presumptive
QC	Quality Control
RER	Relative Error Ratio (Radiochemistry)
RL	Reporting Limit or Requested Limit (Radiochemistry)
RPD	Relative Percent Difference, a measure of the relative difference between two points
TEF	Toxicity Equivalent Factor (Dioxin)
TEQ	Toxicity Equivalent Quotient (Dioxin)
TNTC	Too Numerous To Count

Job Narrative
570-167417-1

Analytical test results meet all requirements of the associated regulatory program listed on the Accreditation/Certification Summary Page unless otherwise noted under the individual analysis. Data qualifiers are applied to indicate exceptions. Noncompliant quality control (QC) is further explained in narrative comments.

- Matrix QC may not be reported if insufficient sample or site-specific QC samples were not submitted. In these situations, to demonstrate precision and accuracy at a batch level, a LCS/LCSD may be performed, unless otherwise specified in the method.
- Surrogate and/or isotope dilution analyte recoveries (if applicable) which are outside of the QC window are confirmed unless attributed to a dilution or otherwise noted in the narrative.

Regulated compliance samples (e.g. SDWA, NPDES) must comply with the associated agency requirements/permits.

Receipt
The samples were received on 1/9/2024 2:03 PM. Unless otherwise noted below, the samples arrived in good condition, and, where required, properly preserved and on ice. The temperature of the cooler at receipt time was 2.2°C

General Chemistry
Method 1664A: Insufficient sample volume was available to perform a matrix spike/matrix spike duplicate (MS/MSD) associated with preparation batch 570-400321.The laboratory control sample (LCS) was performed in duplicate (LCSD) to provide precision data for this batch.

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

Field Service / Mobile Lab
No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

Detection Summary

Client: Carlsbad Energy Center
Project/Site: EWA Waste Water Permit

Job ID: 570-167417-1

Client Sample ID: Sample Point #1 O&G Grab — Lab Sample ID: 570-167417-1

Analyte	Result	Qualifier	RL	NONE	Unit	Dil Fac	D	Method	Prep Type
Field pH	7.39				SU	1		Field Sampling	Total/NA
Field Temperature	21.50				Celsius	1		Field Sampling	Total/NA

Client Sample ID: Sample Point #2 O&G Grab — Lab Sample ID: 570-167417-2

Analyte	Result	Qualifier	RL	NONE	Unit	Dil Fac	D	Method	Prep Type
Field pH	7.53				SU	1		Field Sampling	Total/NA
Field Temperature	20.70				Celsius	1		Field Sampling	Total/NA

This Detection Summary does not include radiochemical test results.

Client Sample Results

Client: Carlsbad Energy Center
Project/Site: EWA Waste Water Permit

Job ID: 570-167417-1

Client Sample ID: Sample Point #1 O&G Grab

Lab Sample ID: 570-167417-1

Date Collected: 01/09/24 09:54
Matrix: Water
Date Received: 01/09/24 14:03

General Chemistry

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
HEM (Oil & Grease) (1664A)	ND		1.1	0.57	mg/L		01/11/24 13:42	01/11/24 18:30	1

Method: EPA Field Sampling - Field Sampling

Analyte	Result	Qualifier	RL	NONE	Unit	D	Prepared	Analyzed	Dil Fac
Field pH	**7.39**				SU			01/09/24 09:54	1
Field Temperature	**21.50**				Celsius			01/09/24 09:54	1

Client: Carlsbad Energy Center
Project/Site: EWA Waste Water Permit

Job ID: 570-167417-1

Client Sample ID: Sample Point #2 O&G Grab

Lab Sample ID: 570-167417-2

Date Collected: 01/09/24 10:02
Matrix: Water
Date Received: 01/09/24 14:03

General Chemistry

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
HEM (Oil & Grease) (1664A)	ND		1.1	0.56	mg/L		01/11/24 13:42	01/11/24 18:30	1

Method: EPA Field Sampling - Field Sampling

Analyte	Result	Qualifier	RL	NONE	Unit	D	Prepared	Analyzed	Dil Fac
Field pH	**7.53**				SU			01/09/24 10:02	1
Field Temperature	**20.70**				Celsius			01/09/24 10:02	1

Client: Carlsbad Energy Center
Project/Site: EWA Waste Water Permit

Job ID: 570-167417-1

Method: 1664A - HEM and SGT-HEM

Lab Sample ID: MB 570-400321/1-A
Matrix: Water
Analysis Batch: 400467

Client Sample ID: Method Blank
Prep Type: Total/NA
Prep Batch: 400321

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
HEM (Oil & Grease)	ND		1.0	0.51	mg/L		01/11/24 13:08	01/11/24 18:30	1

Lab Sample ID: LCS 570-400321/2-B
Matrix: Water
Analysis Batch: 400467

Client Sample ID: Lab Control Sample
Prep Type: Total/NA
Prep Batch: 400321

Analyte			Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits		
HEM (Oil & Grease)			40.0	35.40		mg/L		89	78 - 114		

Lab Sample ID: LCSD 570-400321/3-B
Matrix: Water
Analysis Batch: 400467

Client Sample ID: Lab Control Sample Dup
Prep Type: Total/NA
Prep Batch: 400321

Analyte			Spike Added	LCSD Result	LCSD Qualifier	Unit	D	%Rec	%Rec Limits	RPD	RPD Limit
HEM (Oil & Grease)			40.0	36.20		mg/L		91	78 - 114	2	18

Lab Sample ID: 570-167417-1 DU
Matrix: Water
Analysis Batch: 400467

Client Sample ID: Sample Point #1 O&G Grab
Prep Type: Total/NA
Prep Batch: 400321

Analyte	Sample Result	Sample Qualifier		DU Result	DU Qualifier	Unit	D			RPD	RPD Limit
HEM (Oil & Grease)	ND			ND		mg/L				NC	18

Lab Sample ID: 570-167417-2 DU
Matrix: Water
Analysis Batch: 400467

Client Sample ID: Sample Point #2 O&G Grab
Prep Type: Total/NA
Prep Batch: 400321

Analyte	Sample Result	Sample Qualifier		DU Result	DU Qualifier	Unit	D			RPD	RPD Limit
HEM (Oil & Grease)	ND			ND		mg/L				NC	18

QC Association Summary

Client: Carlsbad Energy Center
Project/Site: EWA Waste Water Permit

Job ID: 570-167417-1

General Chemistry

Prep Batch: 400321

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
570-167417-1	Sample Point #1 O&G Grab	Total/NA	Water	1664A	
570-167417-2	Sample Point #2 O&G Grab	Total/NA	Water	1664A	
MB 570-400321/1-A	Method Blank	Total/NA	Water	1664A	
LCS 570-400321/2-B	Lab Control Sample	Total/NA	Water	1664A	
LCSD 570-400321/3-B	Lab Control Sample Dup	Total/NA	Water	1664A	
570-167417-1 DU	Sample Point #1 O&G Grab	Total/NA	Water	1664A	
570-167417-2 DU	Sample Point #2 O&G Grab	Total/NA	Water	1664A	

Analysis Batch: 400467

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
570-167417-1	Sample Point #1 O&G Grab	Total/NA	Water	1664A	400321
570-167417-2	Sample Point #2 O&G Grab	Total/NA	Water	1664A	400321
MB 570-400321/1-A	Method Blank	Total/NA	Water	1664A	400321
LCS 570-400321/2-B	Lab Control Sample	Total/NA	Water	1664A	400321
LCSD 570-400321/3-B	Lab Control Sample Dup	Total/NA	Water	1664A	400321
570-167417-1 DU	Sample Point #1 O&G Grab	Total/NA	Water	1664A	400321
570-167417-2 DU	Sample Point #2 O&G Grab	Total/NA	Water	1664A	400321

Field Service / Mobile Lab

Analysis Batch: 400930

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
570-167417-1	Sample Point #1 O&G Grab	Total/NA	Water	Field Sampling	
570-167417-2	Sample Point #2 O&G Grab	Total/NA	Water	Field Sampling	

Lab Chronicle

Client: Carlsbad Energy Center
Project/Site: EWA Waste Water Permit

Job ID: 570-167417-1

Client Sample ID: Sample Point #1 O&G Grab

Lab Sample ID: 570-167417-1

Date Collected: 01/09/24 09:54
Matrix: Water
Date Received: 01/09/24 14:03

Prep Type	Batch Type	Batch Method	Run	Dil Factor	Initial Amount	Final Amount	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Prep	1664A			898 mL	1000 mL	400321	01/11/24 13:42	UFLU	EET CAL 4
Total/NA	Analysis	1664A		1			400467	01/11/24 18:30	YTB4	EET CAL 4
	Instrument ID: NO EQUIQ									
Total/NA	Analysis	Field Sampling		1			400930	01/09/24 09:54	N1A	EET CAL 4
	Instrument ID: NOEQUIP									

Client Sample ID: Sample Point #2 O&G Grab

Lab Sample ID: 570-167417-2

Date Collected: 01/09/24 10:02
Matrix: Water
Date Received: 01/09/24 14:03

Prep Type	Batch Type	Batch Method	Run	Dil Factor	Initial Amount	Final Amount	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Prep	1664A			914 mL	1000 mL	400321	01/11/24 13:42	UFLU	EET CAL 4
Total/NA	Analysis	1664A		1			400467	01/11/24 18:30	YTB4	EET CAL 4
	Instrument ID: NO EQUIQ									
Total/NA	Analysis	Field Sampling		1			400930	01/09/24 10:02	N1A	EET CAL 4
	Instrument ID: NOEQUIP									

Laboratory References:

EET CAL 4 = Eurofins Calscience Tustin, 2841 Dow Avenue, Tustin, CA 92780, TEL (714)895-5494

Accreditation/Certification Summary

Client: Carlsbad Energy Center
Project/Site: EWA Waste Water Permit

Job ID: 570-167417-1

Laboratory: Eurofins Calscience

All accreditations/certifications held by this laboratory are listed. Not all accreditations/certifications are applicable to this report.

Authority	Program	Identification Number	Expiration Date
Arizona	State	AZ0830	11-16-24
California	Los Angeles County Sanitation Districts	10109	08-01-24
California	State	3082	07-31-24
Kansas	NELAP	E-10420	08-01-24
Nevada	State	CA00111	07-31-24
Oregon	NELAP	4175	02-02-24
USDA	US Federal Programs	P330-22-00059	06-08-26
Washington	State	C916-18	10-11-24

Method Summary

Client: Carlsbad Energy Center
Project/Site: EWA Waste Water Permit

Job ID: 570-167417-1

Method	Method Description	Protocol	Laboratory
1664A	HEM and SGT-HEM	1664A	EET CAL 4
Field Sampling	Field Sampling	EPA	EET CAL 4
1664A	HEM and SGT-HEM (Aqueous)	1664A	EET CAL 4

Protocol References:

1664A = EPA-821-98-002

EPA = US Environmental Protection Agency

Laboratory References:

EET CAL 4 = Eurofins Calscience Tustin, 2841 Dow Avenue, Tustin, CA 92780, TEL (714)895-5494

Sample Summary

Client: Carlsbad Energy Center
Project/Site: EWA Waste Water Permit

Job ID: 570-167417-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
570-167417-1	Sample Point #1 O&G Grab	Water	01/09/24 09:54	01/09/24 14:03
570-167417-2	Sample Point #2 O&G Grab	Water	01/09/24 10:02	01/09/24 14:03

Loc: 570
167417
MWN9

Chain of Custody Record

Eurofins TestAmerica, Irvine
17461 Derian Avenue
Suite 100
Irvine, CA 92614-5843
phone 949.261.1022 fax 949.260.3299

eurofins Environment Testing TestAmerica

Regulatory Program: ☐ DW ☐ NPDES ☐ RCRA ☑ Other:

TestAmerica Laboratories, Inc. d/b/a Eurofins TestAmerica

Client Contact	Project Manager: Anthony Kalis	Site Contact: Anthony Kalis	1/9/2024	COC No: 1 of 1 COCs
Carlsbad Energy Center	Email: anthony.kalis@nrg.com	Lab Contact: Rossina Tomova	Carrier: Eurofins	TALS Project #:
4950 Avenida Encinas	Tel/Fax: 760-427-2382 / Fax #: None			Sampler: Anthony Kalis
Carlsbad, CA 92008	Analysis Turnaround Time: ☐ CALENDAR DAYS ☑ WORKING DAYS			For Lab Use Only:
Phone: (760) 427-2382	TAT if different from Below ______			Walk-in Client:
FAX - None	☐ 2 weeks			Lab Sampling:
Project Name: EWA Quarterly Sampling	☑ 1 week			
Site: Carlsbad Energy Center	☐ 2 days			Job / SDG No.:
PO # : Use Credit Card	☐ 1 day			

	Sample Identification	Sample Date	Sample Time	Sample Type (C=Comp, G=Grab)	Matrix	# of Cont.	Filtered Sample (Y / N)	Perform MS / MSD (Y / N)	200.7 - (MOD) California Admin Manual L; 245.1 - Hg	2540D - TSS; SM5210B_BOD Calc-BOD, 5 Day	2540C_Calcd-TDS	1664A - Oil & Grease (HEM Only)	Field pH	Sample Specific Notes:
1	Sample Point # 1 - O&G Grab	1/9/2023	9:54	G	H20	2	N	Y	-	-	-	X-2	X	Composite the 2 Oil & Grease samples & perform duplicates
2	Sample Point # 2 - O&G Grab	1/9/2023	10:02	G	H2O	2	N	Y	-	-	-	X-2	X	Composite the 2 Oil & Grease samples & perform duplicates

	Sample Point # 1/ Time	Sample Point # 2/ time
Field pH 1	7.39 pH/21.5°C @ 0954	7.53 pH/20.7°C @ 1002

570-167417 Chain of Custody

Preservation Used: 1= Ice, 2= HCl; 3= H2SO4; 4=HNO3; 5=NaOH; 6= Other ______ — 1/4 | 1 | 1 | 1/3

Possible Hazard Identification:
Are any samples from a listed EPA Hazardous Waste? Please List any EPA Waste Codes for the sample in the Comments Section if the lab is to dispose of the sample.
☑ Non-Hazard ☐ Flammable ☐ Skin Irritant ☐ Poison B ☐ Unknown

Sample Disposal (A fee may be assessed if samples are retained longer than 1 month)
☐ Return to Client ☑ Disposal by Lab ☐ Archive for______ Months

Custody Seals Intact: ☐ Yes ☐ No	Custody Seal No.:		Cooler Temp. (°C): Obs'd:______ Corr'd:______ Therm ID No.:______		
Relinquished by: Anthony Kalis	Company: NRG	Date/Time: 1/9/24 @ 1050	Received by:	Company: KARAM	Date/Time: 1/9/24 @ 1050
Relinquished by:	Company: KARAM	Date/Time: 1/9/24 1403	Received by:	Company:	Date/Time:
Relinquished by:	Company:	Date/Time:	Received in Laboratory by:	Company:	Date/Time: 1/9/24 14:03

Form No. CA-C-WI-002, Rev. 4.25, dated 7/8/2019

2.2/2.2 SC12

Login Sample Receipt Checklist

Client: Carlsbad Energy Center

Job Number: 570-167417-1

Login Number: 167417

List Source: Eurofins Calscience

List Number: 1

Creator: Perez Solis, Daniel

Question	Answer	Comment
Radioactivity wasn't checked or is </= background as measured by a survey meter.	N/A	
The cooler's custody seal, if present, is intact.	True	
Sample custody seals, if present, are intact.	True	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time (excluding tests with immediate HTs)	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	True	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is <6mm (1/4").	True	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	
Residual Chlorine Checked.	N/A	

Eurofins TestAmerica, Irvine
17461 Derian Avenue
Suite 100
Irvine, CA 92614-5843
phone 949.261.1022 fax 949.260.3299

Chain of Custody Record

eurofins Environment Testing TestAmerica

Regulatory Program: ☐ DW ☐ NPDES ☐ RCRA ☑ Other:

TestAmerica Laboratories, Inc. d/b/a Eurofins TestAmerica

Client Contact	Project Manager: Anthony Kalis	Site Contact: Anthony Kalis	1/9/2024	COC No: ___1___ of ___1___ COCs
Carlsbad Energy Center	Email: anthony.kalis@nrg.com	Lab Contact: Rossina Tomova	Carrier: Eurofins	TALS Project #:
4950 Avenida Encinas	Tel/Fax: 760-427-2382 / Fax #: None			Sampler: Anthony Kalis
Carlsbad, CA 92008	Analysis Turnaround Time			For Lab Use Only:
Phone: (760) 427-2382	☐ CALENDAR DAYS ☑ WORKING DAYS			Walk-in Client:
FAX - None	TAT if different from Below ____			Lab Sampling:
Project Name: EWA Quarterly Sampling	☐ 2 weeks			
Site: Carlsbad Energy Center	☑ 1 week			Job / SDG No.:
PO # : Use Credit Card	☐ 2 days			
	☐ 1 day			

Sample Identification	Sample Date	Sample Time	Sample Type (C=Comp, G=Grab)	Matrix	# of Cont.	Filtered Sample (Y / N)	Perform MS / MSD (Y / N)	200.7 - (MOD) California Admin Manual L; 245.1 - Hg	2540D - TSS; SM5210B_BOD Calc-BOD, 5 Day	2540C_Calcd-TDS	1664A - Oil & Grease (HEM Only)	Field pH	Sample Specific Notes:
Sample Point # 1 - O&G Grab	1/9/2023	9:54	G	H20	2	N	Y	-	-	-	X-2	X	Composite the 2 Oil & Grease samples & perform duplicates
Sample Point # 2 - O&G Grab	1/9/2023	10:02	G	H2O	2	N	Y	-	-	-	X-2	X	Composite the 2 Oil & Grease samples & perform duplicates

	Sample Point # 1/ Time	Sample Point # 2/ time
Field pH 1	7.39 pH/21.5°C @ 0954	7.53 pH/20.7°C @ 1002

Preservation Used: 1= Ice, 2= HCl; 3= H2SO4; 4=HNO3; 5=NaOH; 6= Other ______ — 1/4 | 1 | 1 | 1/3

Possible Hazard Identification:
Are any samples from a listed EPA Hazardous Waste? Please List any EPA Waste Codes for the sample in the Comments Section if the lab is to dispose of the sample.
☑ Non-Hazard ☐ Flammable ☐ Skin Irritant ☐ Poison B ☐ Unknown

Sample Disposal (A fee may be assessed if samples are retained longer than 1 month)
☐ Return to Client ☑ Disposal by Lab ☐ Archive for______ Months

Custody Seals Intact: ☐ Yes ☐ No | Custody Seal No.: | Cooler Temp. (°C): Obs'd:______ Corr'd:______ Therm ID No.:______

Relinquished by:	Company:	Date/Time:	Received by:	Company:	Date/Time:
Anthony Kalis [signature]	NRG	1/9/24 @ 1050	[signature]	ECTAM	1/9/24 @ 1050
Relinquished by:	Company:	Date/Time:	Received by:	Company:	Date/Time:
Relinquished by:	Company:	Date/Time:	Received in Laboratory by:	Company:	Date/Time:

Carlsbad Energy Center

pH METER CALIBRATION AND ANALYSIS

Method SM 4500-H+B

Project: EWA Sampling

Meter: HACH HQ 40d

Date: 1/9/24

Start Time: 0927

pH Standards

	MFR	Exp. Date	Lot No.	pH	Temperature
4 Buffer	HACH	3/27	A3084	4.01	22.5 °C
7 Buffer	HACH	2/25	A3055A	7.00	22.8 °C
10 Buffer	HACH	3/24	A3063A	10.01	22.6 °C
Slope = -58.67 mv/pH		mv/pH reading / 59 mv/pH =		99	% slope
off set mv = 0.4 mv					

Potable Water pH		7.82	22.4 °C

Sampling and Analysis

Sample Point	Time	pH	Temperature
Sample Point #1	0954	7.39	21.5 °C
Sample Point #2	1002	7.53	20.7 °C

Standards Check After Analysis

pH Standards

pH Buffer	Time	pH	Temperature
Potable Water	1037	7.80	23.2 °C
pH 7.0	1039	7.03	21.9 °C

Comments:

End Time: 1040

Sampling and Analyses by:

Approved by: Anthony Kalis

June 26, 2024

Carlsbad Energy Center LLC
4950 Avenida Encinas
Carlsbad, CA 92008
Phone: 760-710-3970

Mr. William Svec
Compliance Project Manager
Encina Wastewater Authority
6200 Avenida Encinas
Carlsbad, California 92011

RE: CARLSBAD ENERGY GENTER PROJECT, SECOND QUARTER OF 2024 WASTE WATER SAMPLES

Dear Mr. Svec:

Carlsbad Energy Center LLC ("Project Owner") submits the required samples results for the Second Quarter of 2024 (2Q2024). This report is submitted in compliance with the table in condition 2 of permit number 2405. The samples were taken on May 22, 2024. The following table summarizes the results:

			Results		
Constituent	Limit	Units	Sample Point 1	Sample Point 2	Notes
Oil and Grease (HEM)	400	mg/L	11.8	0.88*	* Below Reporting Limit, but above Minimum Detection Limit (MDL)
pH	5.5-12		7.37	7.20	

If you have any questions or comments, please do not hesitate to contact Paul Mattesich at (760) 710-3945.

Sincerely,

Paul Mattesich
Plant Manager
Carlsbad Energy Center LLC

Attached: EWA Report Certification dated June 26, 2024
Eurofins Calscience Analytical Report EWA Waste Water Permit – June 18, 2024
Carlsbad Energy Center pH Meter Calibration & Analysis – May 22, 2024

Cc: File

ENCINA WASTEWATER AUTHORITY

6200 AVENIDA ENCINAS, CARLSBAD, CA 92011-0195 TEL:(760)438-3941 FAX:(760)476-9852

REPORT CERTIFICATION

I. INDUSTRIAL USER INFORMATION:

Carlsbad Energy Center LLC			
Industrial User Name			
4950 Avenida Encinas	Carlsbad	92008	760-710-3943
Facility Address	City	Zip Code	(Area Code) Phone
Carlsbad Energy Center LLC			
Owner			
Paul Mattesich		Plant Manager	
IU Contact		Title	
City of Carlsbad	2405		
Member Agency	Permit #		

II. CERTIFICATION STATEMENT:

All applications, reports or information submitted to the Encina Wastewater Authority must include the following certification statement and be signed as required by a responsible corporate officer, President, Vice President, Manager, CEO or an authorized representative.

CERTIFICATION STATEMENT

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

PAUL MATTESICH	6/26/24	CARLSBAD
PRESIDENT/VP/GENERAL MGR/CEO (Print and sign name)	DATE	CITY OR COUNTY

eurofins | Environment Testing

1 2 3 4 5 6 7 8 9 10 11 12 13 14

ANALYTICAL REPORT

PREPARED FOR

Attn: Anthony Kalis
Carlsbad Energy Center
4950 Avenida Encinas
Carlsbad, California 92008

Generated 6/18/2024 11:39:50 AM Revision 1

JOB DESCRIPTION

EWA Quarterly Sampling

JOB NUMBER

570-185563-1

Eurofins Calscience
2841 Dow Avenue, Suite 100
Tustin CA 92780

See page two for job notes and contact information.

myEOL

Job Notes

This report may not be reproduced except in full, and with written approval from the laboratory. The results relate only to the samples tested. For questions please contact the Project Manager at the e-mail address or telephone number listed on this page.

The test results in this report relate only to the samples as received by the laboratory and will meet all requirements of the methodology, with any exceptions noted. This report shall not be reproduced except in full, without the express written approval of the laboratory. All questions should be directed to the Eurofins Calscience Project Manager.

Authorization

Generated
6/18/2024 11:39:50 AM
Revision 1

Authorized for release by
Rossina Tomova, Project Manager I
Rossina.Tomova@et.eurofinsus.com
(657)210-6367

Table of Contents

Definitions/Glossary

Client: Carlsbad Energy Center
Project/Site: EWA Quarterly Sampling

Job ID: 570-185563-1

Qualifiers

General Chemistry

Qualifier	Qualifier Description
J	Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.

Glossary

Abbreviation	These commonly used abbreviations may or may not be present in this report.
¤	Listed under the "D" column to designate that the result is reported on a dry weight basis
%R	Percent Recovery
CFL	Contains Free Liquid
CFU	Colony Forming Unit
CNF	Contains No Free Liquid
DER	Duplicate Error Ratio (normalized absolute difference)
Dil Fac	Dilution Factor
DL	Detection Limit (DoD/DOE)
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample
DLC	Decision Level Concentration (Radiochemistry)
EDL	Estimated Detection Limit (Dioxin)
LOD	Limit of Detection (DoD/DOE)
LOQ	Limit of Quantitation (DoD/DOE)
MCL	EPA recommended "Maximum Contaminant Level"
MDA	Minimum Detectable Activity (Radiochemistry)
MDC	Minimum Detectable Concentration (Radiochemistry)
MDL	Method Detection Limit
ML	Minimum Level (Dioxin)
MPN	Most Probable Number
MQL	Method Quantitation Limit
NC	Not Calculated
ND	Not Detected at the reporting limit (or MDL or EDL if shown)
NEG	Negative / Absent
POS	Positive / Present
PQL	Practical Quantitation Limit
PRES	Presumptive
QC	Quality Control
RER	Relative Error Ratio (Radiochemistry)
RL	Reporting Limit or Requested Limit (Radiochemistry)
RPD	Relative Percent Difference, a measure of the relative difference between two points
TEF	Toxicity Equivalent Factor (Dioxin)
TEQ	Toxicity Equivalent Quotient (Dioxin)
TNTC	Too Numerous To Count

Job ID: 570-185563-1 — Eurofins Calscience

Job Narrative
570-185563-1

REVISION
The report being provided is a revision of the original report sent on 6/17/2024. The report (revision 1) is being revised to correct a typo in the Field data for sample 570-185563-5.

Analytical test results meet all requirements of the associated regulatory program listed on the Accreditation/Certification Summary Page unless otherwise noted under the individual analysis. Data qualifiers are applied to indicate exceptions. Noncompliant quality control (QC) is further explained in narrative comments.

- Matrix QC may not be reported if insufficient sample or site-specific QC samples were not submitted. In these situations, to demonstrate precision and accuracy at a batch level, a LCS/LCSD may be performed, unless otherwise specified in the method.
- Surrogate and/or isotope dilution analyte recoveries (if applicable) which are outside of the QC window are confirmed unless attributed to a dilution or otherwise noted in the narrative.

Regulated compliance samples (e.g. SDWA, NPDES) must comply with the associated agency requirements/permits.

Receipt
The samples were received on 5/23/2024 7:34 AM. Unless otherwise noted below, the samples arrived in good condition, and, where required, properly preserved and on ice. The temperature of the cooler at receipt time was 1.2°C.

General Chemistry
No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

Field Service / Mobile Lab
No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

Detection Summary

Client: Carlsbad Energy Center
Project/Site: EWA Quarterly Sampling

Job ID: 570-185563-1

Client Sample ID: Sample Point #1-O&G Grab — Lab Sample ID: 570-185563-5

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
HEM (Oil & Grease)	11.8		1.0	0.53	mg/L	1		1664A	Total/NA
Field pH	7.37				SU	1		Field Sampling	Total/NA
Field Temperature	22.10				Centigrade	1		Field Sampling	Total/NA

Client Sample ID: Sample Point #2-O&G Grab — Lab Sample ID: 570-185563-10

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
HEM (Oil & Grease)	0.88	J	0.98	0.50	mg/L	1		1664A	Total/NA
Field pH	7.20				SU	1		Field Sampling	Total/NA
Field Temperature	23.20				Celsius	1		Field Sampling	Total/NA

This Detection Summary does not include radiochemical test results.

Client Sample Results

Client: Carlsbad Energy Center
Project/Site: EWA Quarterly Sampling

Job ID: 570-185563-1

Client Sample ID: Sample Point #1-O&G Grab

Lab Sample ID: 570-185563-5

Date Collected: 05/22/24 11:55
Matrix: Water
Date Received: 05/23/24 07:34

General Chemistry

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
HEM (Oil & Grease) (1664A)	11.8		1.0	0.53	mg/L		05/28/24 19:41	05/29/24 11:43	1

Method: EPA Field Sampling - Field Sampling

Analyte	Result	Qualifier	RL	NONE	Unit	D	Prepared	Analyzed	Dil Fac
Field pH	7.37				SU			05/22/24 11:55	1
Field Temperature	22.10				Centigrade			05/22/24 11:55	1

Client Sample Results

Client: Carlsbad Energy Center
Project/Site: EWA Quarterly Sampling

Job ID: 570-185563-1

Client Sample ID: Sample Point #2-O&G Grab

Lab Sample ID: 570-185563-10

Date Collected: 05/22/24 12:04
Matrix: Water
Date Received: 05/23/24 07:34

General Chemistry

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
HEM (Oil & Grease) (1664A)	0.88	J	0.98	0.50	mg/L		05/28/24 19:41	05/29/24 11:43	1

Method: EPA Field Sampling - Field Sampling

Analyte	Result	Qualifier	RL	NONE	Unit	D	Prepared	Analyzed	Dil Fac
Field pH	7.20				SU			05/22/24 12:04	1
Field Temperature	23.20				Celsius			05/22/24 12:04	1

Method: 1664A - HEM and SGT-HEM

Lab Sample ID: MB 570-445122/1-A
Matrix: Water
Analysis Batch: 445308

Client Sample ID: Method Blank
Prep Type: Total/NA
Prep Batch: 445122

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
HEM (Oil & Grease)	ND		1.0	0.51	mg/L		05/28/24 21:16	05/28/24 21:16	1

Lab Sample ID: LCS 570-445122/2-A
Matrix: Water
Analysis Batch: 445308

Client Sample ID: Lab Control Sample
Prep Type: Total/NA
Prep Batch: 445122

Analyte			Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits		
HEM (Oil & Grease)			40.0	33.10		mg/L		83	78 - 114		

Lab Sample ID: LCSD 570-445122/3-A
Matrix: Water
Analysis Batch: 445308

Client Sample ID: Lab Control Sample Dup
Prep Type: Total/NA
Prep Batch: 445122

Analyte			Spike Added	LCSD Result	LCSD Qualifier	Unit	D	%Rec	%Rec Limits	RPD	RPD Limit
HEM (Oil & Grease)			40.0	35.90		mg/L		90	78 - 114	8	18

Lab Sample ID: 570-186007-A-1-B MS
Matrix: Water
Analysis Batch: 445308

Client Sample ID: Matrix Spike
Prep Type: Total/NA
Prep Batch: 445122

Analyte	Sample Result	Sample Qualifier	Spike Added	MS Result	MS Qualifier	Unit	D	%Rec	%Rec Limits		
HEM (Oil & Grease)	1.9		38.9	37.65		mg/L		92	78 - 114		

Lab Sample ID: 570-186007-A-1-C MSD
Matrix: Water
Analysis Batch: 445308

Client Sample ID: Matrix Spike Duplicate
Prep Type: Total/NA
Prep Batch: 445122

Analyte	Sample Result	Sample Qualifier	Spike Added	MSD Result	MSD Qualifier	Unit	D	%Rec	%Rec Limits	RPD	RPD Limit
HEM (Oil & Grease)	1.9		39.2	35.06		mg/L		85	78 - 114	7	18

Lab Sample ID: 570-185563-5 DU
Matrix: Water
Analysis Batch: 445308

Client Sample ID: Sample Point #1-O&G Grab
Prep Type: Total/NA
Prep Batch: 445122

Analyte	Sample Result	Sample Qualifier		DU Result	DU Qualifier	Unit	D			RPD	RPD Limit
HEM (Oil & Grease)	11.8			11.04		mg/L				7	18

Lab Sample ID: 570-185563-10 DU
Matrix: Water
Analysis Batch: 445308

Client Sample ID: Sample Point #2-O&G Grab
Prep Type: Total/NA
Prep Batch: 445122

Analyte	Sample Result	Sample Qualifier		DU Result	DU Qualifier	Unit	D			RPD	RPD Limit
HEM (Oil & Grease)	0.88	J		0.929	J	mg/L				6	18

QC Association Summary

Client: Carlsbad Energy Center
Project/Site: EWA Quarterly Sampling

Job ID: 570-185563-1

General Chemistry

Prep Batch: 445122

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
570-185563-5	Sample Point #1-O&G Grab	Total/NA	Water	1664A	
570-185563-10	Sample Point #2-O&G Grab	Total/NA	Water	1664A	
MB 570-445122/1-A	Method Blank	Total/NA	Water	1664A	
LCS 570-445122/2-A	Lab Control Sample	Total/NA	Water	1664A	
LCSD 570-445122/3-A	Lab Control Sample Dup	Total/NA	Water	1664A	
570-186007-A-1-B MS	Matrix Spike	Total/NA	Water	1664A	
570-186007-A-1-C MSD	Matrix Spike Duplicate	Total/NA	Water	1664A	
570-185563-5 DU	Sample Point #1-O&G Grab	Total/NA	Water	1664A	
570-185563-10 DU	Sample Point #2-O&G Grab	Total/NA	Water	1664A	

Analysis Batch: 445308

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
570-185563-5	Sample Point #1-O&G Grab	Total/NA	Water	1664A	445122
570-185563-10	Sample Point #2-O&G Grab	Total/NA	Water	1664A	445122
MB 570-445122/1-A	Method Blank	Total/NA	Water	1664A	445122
LCS 570-445122/2-A	Lab Control Sample	Total/NA	Water	1664A	445122
LCSD 570-445122/3-A	Lab Control Sample Dup	Total/NA	Water	1664A	445122
570-186007-A-1-B MS	Matrix Spike	Total/NA	Water	1664A	445122
570-186007-A-1-C MSD	Matrix Spike Duplicate	Total/NA	Water	1664A	445122
570-185563-5 DU	Sample Point #1-O&G Grab	Total/NA	Water	1664A	445122
570-185563-10 DU	Sample Point #2-O&G Grab	Total/NA	Water	1664A	445122

Field Service / Mobile Lab

Analysis Batch: 445134

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
570-185563-10	Sample Point #2-O&G Grab	Total/NA	Water	Field Sampling	

Analysis Batch: 450945

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
570-185563-5	Sample Point #1-O&G Grab	Total/NA	Water	Field Sampling	

Lab Chronicle

Client: Carlsbad Energy Center
Project/Site: EWA Quarterly Sampling

Job ID: 570-185563-1

Client Sample ID: Sample Point #1-O&G Grab

Lab Sample ID: 570-185563-5

Date Collected: 05/22/24 11:55
Matrix: Water
Date Received: 05/23/24 07:34

Prep Type	Batch Type	Batch Method	Run	Dil Factor	Initial Amount	Final Amount	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Prep	1664A			972 mL	1000 mL	445122	05/28/24 19:41	TR8L	EET CAL 4
Total/NA	Analysis	1664A		1			445308	05/29/24 11:43	KH3Z	EET CAL 4
	Instrument ID: NO EQUIQ									
Total/NA	Analysis	Field Sampling		1			450945	05/22/24 11:55	IID3	EET CAL 4
	Instrument ID: NOEQUIP									

Client Sample ID: Sample Point #2-O&G Grab

Lab Sample ID: 570-185563-10

Date Collected: 05/22/24 12:04
Matrix: Water
Date Received: 05/23/24 07:34

Prep Type	Batch Type	Batch Method	Run	Dil Factor	Initial Amount	Final Amount	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Prep	1664A			1024 mL	1000 mL	445122	05/28/24 19:41	TR8L	EET CAL 4
Total/NA	Analysis	1664A		1			445308	05/29/24 11:43	KH3Z	EET CAL 4
	Instrument ID: NO EQUIQ									
Total/NA	Analysis	Field Sampling		1			445134	05/22/24 12:04	N1A	EET CAL 4
	Instrument ID: NOEQUIP									

Laboratory References:

EET CAL 4 = Eurofins Calscience Tustin, 2841 Dow Avenue, Tustin, CA 92780, TEL (714)895-5494

Accreditation/Certification Summary

Client: Carlsbad Energy Center
Project/Site: EWA Quarterly Sampling

Job ID: 570-185563-1

Laboratory: Eurofins Calscience

All accreditations/certifications held by this laboratory are listed. Not all accreditations/certifications are applicable to this report.

Authority	Program	Identification Number	Expiration Date
Arizona	State	AZ0830	11-16-24
California	Los Angeles County Sanitation Districts	10109	08-01-24
California	State	3082	07-31-24
Kansas	NELAP	E-10420	08-01-24
Nevada	State	CA00111	07-31-24
Oregon	NELAP	4175	06-11-24
USDA	US Federal Programs	P330-22-00059	06-08-26
Washington	State	C916-18	10-11-24

Method Summary

Client: Carlsbad Energy Center
Project/Site: EWA Quarterly Sampling

Job ID: 570-185563-1

Method	Method Description	Protocol	Laboratory
1664A	HEM and SGT-HEM	1664A	EET CAL 4
Field Sampling	Field Sampling	EPA	EET CAL 4
1664A	HEM and SGT-HEM (Aqueous)	1664A	EET CAL 4

Protocol References:

1664A = EPA-821-98-002

EPA = US Environmental Protection Agency

Laboratory References:

EET CAL 4 = Eurofins Calscience Tustin, 2841 Dow Avenue, Tustin, CA 92780, TEL (714)895-5494

Sample Summary

Client: Carlsbad Energy Center
Project/Site: EWA Quarterly Sampling

Job ID: 570-185563-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
570-185563-5	Sample Point #1-O&G Grab	Water	05/22/24 11:55	05/23/24 07:34
570-185563-10	Sample Point #2-O&G Grab	Water	05/22/24 12:04	05/23/24 07:34

Loc: 570
185563

Eurofins TestAmerica, Irvine
17461 Derian Avenue
Suite 100
Irvine CA 92614-5843
phone 949 261 1022 fax 949 260 3299

Chain of Custody Record

eurofins Environment Testing

Regulatory Program: ☐ DW ☐ NPDES ☐ RCRA ☑ Other

TestAmerica Laboratories, Inc. d/b/a Eurofins TestAmerica

Client Contact	Project Manager: Anthony Kalis	Site Contact: Anthony Kalis	5/22/2024	COC No
Carlsbad Energy Center	Email anthony kalis@nrg com	Lab Contact: Rossina Tomova	Carrier: Eurofins	1 of 1 COCs
4950 Avenida Encinas	Tel/Fax: 760-427-2382 / Fax #: None			TALS Project #
Carlsbad CA 92008	Analysis Turnaround Time			Sampler: Anthony Kalis
Phone (760) 427-2382	☐ CALENDAR DAYS ☑ WORKING DAYS			For Lab Use Only:
FAX - None	TAT if different from Below ____			Walk-in Client
Project Name EWA Quarterly Sampling	☐ 2 weeks			Lab Sampling
Site Carlsbad Energy Center	☑ 1 week			Job / SDG No
PO # Use Credit Card	☐ 2 days			
	☐ 1 day			

Sample Identification	Sample Date	Sample Time	Sample Type (C=Comp, G=Grab)	Matrix	# of Cont.	Filtered Sample (Y / N)	Perform MS / MSD (Y / N)	200 7 - (MOD) California Admin Manual L, 245 1 - Hg	2540D - TSS, SM5210B_BOD Calc-BOD, 5 Day	2540C_Calcd-TDS	1664A - Oil & Grease (HEM Only)	Field pH	Sample Specific Notes
5 Sample Point # 1 - O&G Grab (1-4)	5/22/2024	11 55	G	H20	4	N	Y	-	-	-	X-4	X	Composite the 4 Oil & Grease samples & perform duplicates
10 Sample Point # 2 - O&G Grab (6-9)	5/22/2024	12 04	G	H2O	4	N	Y	-	-	-	X-4	X	Composite the 4 Oil & Grease samples & perform duplicates
											1/3		

570-185563 Chain of Custody

	Sample Point # 1/ Time	Sample Point # 2/ time
Field pH 1	7 37 pH/22 1°C @ 1155	7 20 pH/23 2°C @ 1204

Preservation Used: 1= Ice, 2= HCl; 3= H2SO4; 4=HNO3; 5=NaOH; 6= Other ____

Possible Hazard Identification:
Are any samples from a listed EPA Hazardous Waste? Please List any EPA Waste Codes for the sample in the Comments Section if the lab is to dispose of the sample

☑ Non-Hazard ☐ Flammable ☐ Skin Irritant ☐ Poison B ☐ Unknown

Sample Disposal (A fee may be assessed if samples are retained longer than 1 month)

☐ Return to Client ☑ Disposal by Lab ☐ Archive for ____ Months

Custody Seals Intact ☐ Yes ☐ No | Custody Seal No | Cooler Temp (°C): Obs'd 1.1 Corr'd 1.2 Therm ID No SC14

	Company	Date/Time	Received by	Company	Date/Time
Relinquished by: Anthony Kalis	NRG	5/22/24 @ 1257		Eurofins	5/22/24 @ 1258
Relinquished by	Eurofins	5/23/24	Received by	Company	Date/Time
Relinquished by	Company	Date/Time 0734	Received in Laboratory by	Company E	Date/Time 5/23/24 0734

Form No. CA-C-WI-002, Rev. 4.25, dated 7/8/2019

Login Sample Receipt Checklist

Client: Carlsbad Energy Center

Job Number: 570-185563-1

Login Number: 185563
List Number: 1
Creator: Vitente, Precy

List Source: Eurofins Calscience

Question	Answer	Comment
Radioactivity wasn't checked or is </= background as measured by a survey meter.	N/A	
The cooler's custody seal, if present, is intact.	True	
Sample custody seals, if present, are intact.	True	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time (excluding tests with immediate HTs)	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	True	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is <6mm (1/4").	True	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	
Residual Chlorine Checked.	N/A	

Eurofins TestAmerica, Irvine
17461 Derian Avenue
Suite 100
Irvine, CA 92614-5843
phone 949.261.1022 fax 949.260.3299

Chain of Custody Record

eurofins Environment Testing TestAmerica

Regulatory Program: ☐ DW ☐ NPDES ☐ RCRA ☑ Other:

TestAmerica Laboratories, Inc. d/b/a Eurofins TestAmerica

	Project Manager: Anthony Kalis			COC No:
Client Contact	**Email: anthony.kalis@nrg.com**	**Site Contact: Anthony Kalis**	**5/22/2024**	1 of 1 COCs
Carlsbad Energy Center	**Tel/Fax: 760-427-2382 / Fax #: None**	**Lab Contact: Rossina Tomova**	**Carrier: Eurofins**	TALS Project #:
4950 Avenida Encinas	**Analysis Turnaround Time**			Sampler: Anthony Kalis
Carlsbad, CA 92008	☐ CALENDAR DAYS ☑ WORKING DAYS			**For Lab Use Only:**
Phone: (760) 427-2382	TAT if different from Below ________			Walk-in Client:
FAX - None	☐ 2 weeks			Lab Sampling:
Project Name: EWA Quarterly Sampling	☑ 1 week			
Site: Carlsbad Energy Center	☐ 2 days			Job / SDG No.:
PO # : Use Credit Card	☐ 1 day			

Sample Identification	Sample Date	Sample Time	Sample Type (C=Comp, G=Grab)	Matrix	# of Cont.	Filtered Sample (Y / N)	Perform MS / MSD (Y / N)	200.7 - (MOD) California Admin Manual L; 245.1 - Hg	2540D - TSS; SM5210B_BOD Calc-BOD, 5 Day	2540C_Calcd-TDS	1664A - Oil & Grease (HEM Only)	Field pH	Sample Specific Notes:
Sample Point # 1 - O&G Grab	5/22/2024	11:55	G	H20	4	N	Y	-	-	-	X-4	X	Composite the 4 Oil & Grease samples & perform duplicates
Sample Point # 2 - O&G Grab	5/22/2024	12:04	G	H2O	4	N	Y	-	-	-	X-4	X	Composite the 4 Oil & Grease samples & perform duplicates

	Sample Point # 1/ Time	Sample Point # 2/ time
Field pH 1	7.37 pH/22.1°C @ 1155	7.20 pH/23.2°C @ 1204

Preservation Used: 1= Ice, 2= HCl; 3= H2SO4; 4=HNO3; 5=NaOH; 6= Other ________ — 1664A: 1/3

Possible Hazard Identification:
Are any samples from a listed EPA Hazardous Waste? Please List any EPA Waste Codes for the sample in the Comments Section if the lab is to dispose of the sample.

☑ Non-Hazard ☐ Flammable ☐ Skin Irritant ☐ Poison B ☐ Unknown

Sample Disposal (A fee may be assessed if samples are retained longer than 1 month)

☐ Return to Client ☑ Disposal by Lab ☐ Archive for________ Months

Custody Seals Intact: ☐ Yes ☐ No | Custody Seal No.: | Cooler Temp. (°C): Obs'd:________ Corr'd:________ Therm ID No.:________

Relinquished by: Anthony Kalis [signature]	Company: NRG	Date/Time: 5/22/24 @ 1257	Received by: [signature]	Company: KRAM	Date/Time: 5/22/24 @ 1258
Relinquished by:	Company:	Date/Time:	Received by:	Company:	Date/Time:
Relinquished by:	Company:	Date/Time:	Received in Laboratory by:	Company:	Date/Time:

Carlsbad Energy Center

pH METER CALIBRATION AND ANALYSIS

Method SM 4500-H+B

Project: EWA Sampling

Meter: HACH HQ 40d

Date: 5/22/24

Start Time: 1130

pH Standards

	MFR	Exp. Date	Lot No.	pH	Temperature
4 Buffer	HACH	01/28	A4025	4.01	21.0 °C
7 Buffer	HACH	01/26	A4017	7.00	21.0 °C
10 Buffer	HACH	01/25	A4025	10.01	21.1 °C
Slope = -57.99 mv/pH		mv/pH reading / 59 mv/pH = 98 % slope			
off set mv = 1.9 mv					

Potable Water pH		7.90	23.5 °C

Sampling and Analysis

Sample Point	Time	pH	Temperature
Sample Point #1	1155	7.37	22.1 °C
Sample Point #2	1204	7.20	23.2 °C

Standards Check After Analysis

pH Standards

pH Buffer	Time	pH	Temperature
Potable Water	1236	7.84	23.8 °C
pH 7.0	1239	7.05	21.4 °C

Comments:

End Time: 1239

Sampling and Analyses by:

Approved by:

Anthony Kalis

August 15, 2024

Carlsbad Energy Center LLC
4950 Avenida Encinas
Carlsbad, CA 92008
Phone: 760-710-3970

Mr. William Svec
Compliance Project Manager
Encina Wastewater Authority
6200 Avenida Encinas
Carlsbad, California 92011

RE: CARLSBAD ENERGY CENTER PROJECT, THIRD QUARTER OF 2024 WASTE WATER SAMPLES

Dear Mr. Svec:

Carlsbad Energy Center LLC ("Project Owner") submits the required samples results for the Third Quarter of 2024 (3Q2024). This report is submitted in compliance with the table in condition 2 of permit number 2405. The samples were taken on July 30, 2024. The following table summarizes the results:

			Results		
Constituent	Limit	Units	Sample Point 1	Sample Point 2	Notes
Oil and Grease (HEM)	400	mg/L	ND	ND	ND: Non Detect
pH	5.5-12		6.51	7.34	

If you have any questions or comments, please do not hesitate to contact Paul Mattesich at (760) 710-3945.

Sincerely,

Paul Mattesich
Plant Manager
Carlsbad Energy Center LLC

Attached: EWA Report Certification dated August 15, 2024
Eurofins Calscience Analytical Report EWA Waste Water Permit – August 8, 2024
Carlsbad Energy Center COC & pH Meter Calibration – June 30, 2024

Cc: File

ENCINA WASTEWATER AUTHORITY

6200 AVENIDA ENCINAS, CARLSBAD, CA 92011-0195 TEL:(760)438-3941 FAX:(760)476-9852

REPORT CERTIFICATION

I. INDUSTRIAL USER INFORMATION:

Carlsbad Energy Center LLC
Industrial User Name

4950 Avenida Encinas	Carlsbad	92008	760-710-3943
Facility Address	City	Zip Code	(Area Code) Phone

Carlsbad Energy Center LLC
Owner

Paul Mattesich — Plant Manager
IU Contact — Title

City of Carlsbad — 2405
Member Agency — Permit #

II. CERTIFICATION STATEMENT:

All applications, reports or information submitted to the Encina Wastewater Authority must include the following certification statement and be signed as required by a responsible corporate officer, President, Vice President, Manager, CEO or an authorized representative.

CERTIFICATION STATEMENT

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

PAUL MATTESICH	8/15/24	CARLSBAD
PRESIDENT/VP/GENERAL MGR/CEO (Print and sign name)	DATE	CITY OR COUNTY

eurofins | Environment Testing

ANALYTICAL REPORT

PREPARED FOR

Attn: Anthony Kalis
Carlsbad Energy Center
4950 Avenida Encinas
Carlsbad, California 92008

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JOB DESCRIPTION

EWA Quarterly Sampling

JOB NUMBER

570-193455-1

Eurofins Calscience
2841 Dow Avenue, Suite 100
Tustin CA 92780

See page two for job notes and contact information.

Job Notes

This report may not be reproduced except in full, and with written approval from the laboratory. The results relate only to the samples tested. For questions please contact the Project Manager at the e-mail address or telephone number listed on this page.

The test results in this report relate only to the samples as received by the laboratory and will meet all requirements of the methodology, with any exceptions noted. This report shall not be reproduced except in full, without the express written approval of the laboratory. All questions should be directed to the Eurofins Calscience Project Manager.

Authorization

Generated
8/8/2024 2:49:17 PM

Authorized for release by
Rossina Tomova, Project Manager I
Rossina.Tomova@et.eurofinsus.com
(657)210-6367

Table of Contents

Definitions/Glossary

Client: Carlsbad Energy Center
Project/Site: EWA Quarterly Sampling

Job ID: 570-193455-1

Glossary

Abbreviation	These commonly used abbreviations may or may not be present in this report.
¤	Listed under the "D" column to designate that the result is reported on a dry weight basis
%R	Percent Recovery
CFL	Contains Free Liquid
CFU	Colony Forming Unit
CNF	Contains No Free Liquid
DER	Duplicate Error Ratio (normalized absolute difference)
Dil Fac	Dilution Factor
DL	Detection Limit (DoD/DOE)
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample
DLC	Decision Level Concentration (Radiochemistry)
EDL	Estimated Detection Limit (Dioxin)
LOD	Limit of Detection (DoD/DOE)
LOQ	Limit of Quantitation (DoD/DOE)
MCL	EPA recommended "Maximum Contaminant Level"
MDA	Minimum Detectable Activity (Radiochemistry)
MDC	Minimum Detectable Concentration (Radiochemistry)
MDL	Method Detection Limit
ML	Minimum Level (Dioxin)
MPN	Most Probable Number
MQL	Method Quantitation Limit
NC	Not Calculated
ND	Not Detected at the reporting limit (or MDL or EDL if shown)
NEG	Negative / Absent
POS	Positive / Present
PQL	Practical Quantitation Limit
PRES	Presumptive
QC	Quality Control
RER	Relative Error Ratio (Radiochemistry)
RL	Reporting Limit or Requested Limit (Radiochemistry)
RPD	Relative Percent Difference, a measure of the relative difference between two points
TEF	Toxicity Equivalent Factor (Dioxin)
TEQ	Toxicity Equivalent Quotient (Dioxin)
TNTC	Too Numerous To Count

Job ID: 570-193455-1 — Eurofins Calscience

Job Narrative
570-193455-1

Analytical test results meet all requirements of the associated regulatory program listed on the Accreditation/Certification Summary Page unless otherwise noted under the individual analysis. Data qualifiers and/or narrative comments are included to explain any exceptions, if applicable.

- Matrix QC may not be reported if insufficient sample is provided or site-specific QC samples were not submitted. In these situations, to demonstrate precision and accuracy at a batch level, a LCS/LCSD may be performed, unless otherwise specified in the method.
- Surrogate and/or isotope dilution analyte recoveries (if applicable) which are outside of the QC window are confirmed unless attributed to a dilution or otherwise noted in the narrative.

Regulated compliance samples (e.g. SDWA, NPDES) must comply with the associated agency requirements/permits.

Receipt
The samples were received on 7/31/2024 7:07 AM. Unless otherwise noted below, the samples arrived in good condition, and, where required, properly preserved and on ice. The temperature of the cooler at receipt time was 0.8°C.

Receipt Exceptions
The Field Sampler was not listed on the Chain of Custody.

General Chemistry
No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

Field Service / Mobile Lab
No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

Detection Summary

Client: Carlsbad Energy Center
Project/Site: EWA Quarterly Sampling

Job ID: 570-193455-1

Client Sample ID: Sample Point #1-O&G Grab — Lab Sample ID: 570-193455-17

Analyte	Result	Qualifier	RL	NONE	Unit	Dil Fac	D	Method	Prep Type
Field pH	6.51				SU	1		Field Sampling	Total/NA
Field Temperature	28.50				Celsius	1		Field Sampling	Total/NA

Client Sample ID: Sample Point #2-O&G Grab — Lab Sample ID: 570-193455-34

Analyte	Result	Qualifier	RL	NONE	Unit	Dil Fac	D	Method	Prep Type
Field pH	7.34				SU	1		Field Sampling	Total/NA
Field Temperature	29.40				Celsius	1		Field Sampling	Total/NA

This Detection Summary does not include radiochemical test results.

Client Sample Results

Client: Carlsbad Energy Center
Project/Site: EWA Quarterly Sampling

Job ID: 570-193455-1

Client Sample ID: Sample Point #1-O&G Grab

Lab Sample ID: 570-193455-17

Date Collected: 07/30/24 09:23
Matrix: Water
Date Received: 07/31/24 07:07

General Chemistry

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
HEM (Oil & Grease) (1664A)	ND		1.1	0.57	mg/L		08/02/24 10:31	08/02/24 15:25	1

Method: EPA Field Sampling - Field Sampling

Analyte	Result	Qualifier	RL	NONE	Unit	D	Prepared	Analyzed	Dil Fac
Field pH	**6.51**				SU			07/30/24 09:23	1
Field Temperature	**28.50**				Celsius			07/30/24 09:23	1

Client Sample Results

Client: Carlsbad Energy Center
Project/Site: EWA Quarterly Sampling

Job ID: 570-193455-1

Client Sample ID: Sample Point #2-O&G Grab

Date Collected: 07/30/24 09:38
Date Received: 07/31/24 07:07

Lab Sample ID: 570-193455-34

Matrix: Water

General Chemistry

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
HEM (Oil & Grease) (1664A)	ND		1.1	0.55	mg/L		08/02/24 10:31	08/02/24 15:25	1

Method: EPA Field Sampling - Field Sampling

Analyte	Result	Qualifier	RL	NONE	Unit	D	Prepared	Analyzed	Dil Fac
Field pH	**7.34**				SU			07/30/24 09:38	1
Field Temperature	**29.40**				Celsius			07/30/24 09:38	1

Method: 1664A - HEM and SGT-HEM

Lab Sample ID: MB 570-466781/1-A
Matrix: Water
Analysis Batch: 466895

Client Sample ID: Method Blank
Prep Type: Total/NA
Prep Batch: 466781

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
HEM (Oil & Grease)	ND		1.0	0.51	mg/L		08/02/24 10:31	08/02/24 15:25	1

Lab Sample ID: LCS 570-466781/2-A
Matrix: Water
Analysis Batch: 466895

Client Sample ID: Lab Control Sample
Prep Type: Total/NA
Prep Batch: 466781

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
HEM (Oil & Grease)	40.0	34.00		mg/L		85	78 - 114

Lab Sample ID: LCSD 570-466781/3-A
Matrix: Water
Analysis Batch: 466895

Client Sample ID: Lab Control Sample Dup
Prep Type: Total/NA
Prep Batch: 466781

Analyte	Spike Added	LCSD Result	LCSD Qualifier	Unit	D	%Rec	%Rec Limits	RPD	RPD Limit
HEM (Oil & Grease)	40.0	32.00		mg/L		80	78 - 114	6	18

Lab Sample ID: 570-193455-17 MS
Matrix: Water
Analysis Batch: 466895

Client Sample ID: Sample Point #1-O&G Grab
Prep Type: Total/NA
Prep Batch: 466781

Analyte	Sample Result	Sample Qualifier	Spike Added	MS Result	MS Qualifier	Unit	D	%Rec	%Rec Limits
HEM (Oil & Grease)	ND		42.1	36.46		mg/L		87	78 - 114

Lab Sample ID: 570-193455-17 MSD
Matrix: Water
Analysis Batch: 466895

Client Sample ID: Sample Point #1-O&G Grab
Prep Type: Total/NA
Prep Batch: 466781

Analyte	Sample Result	Sample Qualifier	Spike Added	MSD Result	MSD Qualifier	Unit	D	%Rec	%Rec Limits	RPD	RPD Limit
HEM (Oil & Grease)	ND		42.4	38.03		mg/L		90	78 - 114	4	18

Lab Sample ID: 570-193455-34 MS
Matrix: Water
Analysis Batch: 466895

Client Sample ID: Sample Point #2-O&G Grab
Prep Type: Total/NA
Prep Batch: 466781

Analyte	Sample Result	Sample Qualifier	Spike Added	MS Result	MS Qualifier	Unit	D	%Rec	%Rec Limits
HEM (Oil & Grease)	ND		42.6	37.10		mg/L		87	78 - 114

Lab Sample ID: 570-193455-34 MSD
Matrix: Water
Analysis Batch: 466895

Client Sample ID: Sample Point #2-O&G Grab
Prep Type: Total/NA
Prep Batch: 466781

Analyte	Sample Result	Sample Qualifier	Spike Added	MSD Result	MSD Qualifier	Unit	D	%Rec	%Rec Limits	RPD	RPD Limit
HEM (Oil & Grease)	ND		42.2	35.13		mg/L		83	78 - 114	5	18

Lab Sample ID: 570-193455-17 DU
Matrix: Water
Analysis Batch: 466895

Client Sample ID: Sample Point #1-O&G Grab
Prep Type: Total/NA
Prep Batch: 466781

Analyte	Sample Result	Sample Qualifier	DU Result	DU Qualifier	Unit	D	RPD	RPD Limit
HEM (Oil & Grease)	ND		ND		mg/L		NC	18

Client: Carlsbad Energy Center
Project/Site: EWA Quarterly Sampling

Job ID: 570-193455-1

Method: 1664A - HEM and SGT-HEM

Lab Sample ID: 570-193455-34 DU
Matrix: Water
Analysis Batch: 466895

Client Sample ID: Sample Point #2-O&G Grab
Prep Type: Total/NA
Prep Batch: 466781

Analyte	Sample Result	Sample Qualifier		DU Result	DU Qualifier	Unit	D			RPD	RPD Limit
HEM (Oil & Grease)	ND			ND		mg/L				NC	18

QC Association Summary

Client: Carlsbad Energy Center
Project/Site: EWA Quarterly Sampling

Job ID: 570-193455-1

General Chemistry

Prep Batch: 466781

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
570-193455-17	Sample Point #1-O&G Grab	Total/NA	Water	1664A	
570-193455-34	Sample Point #2-O&G Grab	Total/NA	Water	1664A	
MB 570-466781/1-A	Method Blank	Total/NA	Water	1664A	
LCS 570-466781/2-A	Lab Control Sample	Total/NA	Water	1664A	
LCSD 570-466781/3-A	Lab Control Sample Dup	Total/NA	Water	1664A	
570-193455-17 MS	Sample Point #1-O&G Grab	Total/NA	Water	1664A	
570-193455-17 MSD	Sample Point #1-O&G Grab	Total/NA	Water	1664A	
570-193455-34 MS	Sample Point #2-O&G Grab	Total/NA	Water	1664A	
570-193455-34 MSD	Sample Point #2-O&G Grab	Total/NA	Water	1664A	
570-193455-17 DU	Sample Point #1-O&G Grab	Total/NA	Water	1664A	
570-193455-34 DU	Sample Point #2-O&G Grab	Total/NA	Water	1664A	

Analysis Batch: 466895

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
570-193455-17	Sample Point #1-O&G Grab	Total/NA	Water	1664A	466781
570-193455-34	Sample Point #2-O&G Grab	Total/NA	Water	1664A	466781
MB 570-466781/1-A	Method Blank	Total/NA	Water	1664A	466781
LCS 570-466781/2-A	Lab Control Sample	Total/NA	Water	1664A	466781
LCSD 570-466781/3-A	Lab Control Sample Dup	Total/NA	Water	1664A	466781
570-193455-17 MS	Sample Point #1-O&G Grab	Total/NA	Water	1664A	466781
570-193455-17 MSD	Sample Point #1-O&G Grab	Total/NA	Water	1664A	466781
570-193455-34 MS	Sample Point #2-O&G Grab	Total/NA	Water	1664A	466781
570-193455-34 MSD	Sample Point #2-O&G Grab	Total/NA	Water	1664A	466781
570-193455-17 DU	Sample Point #1-O&G Grab	Total/NA	Water	1664A	466781
570-193455-34 DU	Sample Point #2-O&G Grab	Total/NA	Water	1664A	466781

Field Service / Mobile Lab

Analysis Batch: 468562

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
570-193455-17	Sample Point #1-O&G Grab	Total/NA	Water	Field Sampling	
570-193455-34	Sample Point #2-O&G Grab	Total/NA	Water	Field Sampling	

Lab Chronicle

Client: Carlsbad Energy Center
Project/Site: EWA Quarterly Sampling

Job ID: 570-193455-1

Client Sample ID: Sample Point #1-O&G Grab

Lab Sample ID: 570-193455-17

Date Collected: 07/30/24 09:23
Matrix: Water
Date Received: 07/31/24 07:07

Prep Type	Batch Type	Batch Method	Run	Dil Factor	Initial Amount	Final Amount	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Prep	1664A			896 mL	1000 mL	466781	08/02/24 10:31	UWEZ	EET CAL 4
Total/NA	Analysis	1664A		1			466895	08/02/24 15:25	B8AH	EET CAL 4
	Instrument ID: NO EQUIQ									
Total/NA	Analysis	Field Sampling		1			468562	07/30/24 09:23	N1A	EET CAL 4
	Instrument ID: NOEQUIP									

Client Sample ID: Sample Point #2-O&G Grab

Lab Sample ID: 570-193455-34

Date Collected: 07/30/24 09:38
Matrix: Water
Date Received: 07/31/24 07:07

Prep Type	Batch Type	Batch Method	Run	Dil Factor	Initial Amount	Final Amount	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Prep	1664A			930 mL	1000 mL	466781	08/02/24 10:31	UWEZ	EET CAL 4
Total/NA	Analysis	1664A		1			466895	08/02/24 15:25	B8AH	EET CAL 4
	Instrument ID: NO EQUIQ									
Total/NA	Analysis	Field Sampling		1			468562	07/30/24 09:38	N1A	EET CAL 4
	Instrument ID: NOEQUIP									

Laboratory References:

EET CAL 4 = Eurofins Calscience Tustin, 2841 Dow Avenue, Tustin, CA 92780, TEL (714)895-5494

Accreditation/Certification Summary

Client: Carlsbad Energy Center
Job ID: 570-193455-1
Project/Site: EWA Quarterly Sampling

Laboratory: Eurofins Calscience

All accreditations/certifications held by this laboratory are listed. Not all accreditations/certifications are applicable to this report.

Authority	Program	Identification Number	Expiration Date
Arizona	State	AZ0830	11-16-24
Arkansas DEQ	State	88-0161	07-02-25
California	State	3082	07-31-26
Kansas	NELAP	E-10420	07-31-25
Nevada	State	CA00111	10-31-24
Oregon	NELAP	4175	02-02-25
USDA	US Federal Programs	P330-22-00059	06-08-26
Washington	State	C916-18	10-11-24

Method Summary

Client: Carlsbad Energy Center
Project/Site: EWA Quarterly Sampling

Job ID: 570-193455-1

Method	Method Description	Protocol	Laboratory
1664A	HEM and SGT-HEM	1664A	EET CAL 4
Field Sampling	Field Sampling	EPA	EET CAL 4
1664A	HEM and SGT-HEM (Aqueous)	1664A	EET CAL 4

Protocol References:

1664A = EPA-821-98-002

EPA = US Environmental Protection Agency

Laboratory References:

EET CAL 4 = Eurofins Calscience Tustin, 2841 Dow Avenue, Tustin, CA 92780, TEL (714)895-5494

Sample Summary

Client: Carlsbad Energy Center
Project/Site: EWA Quarterly Sampling

Job ID: 570-193455-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
570-193455-17	Sample Point #1-O&G Grab	Water	07/30/24 09:23	07/31/24 07:07
570-193455-34	Sample Point #2-O&G Grab	Water	07/30/24 09:38	07/31/24 07:07

193455

Eurofins TestAmerica, Irvine
17461 Derian Avenue
Suite 100
Irvine, CA 92614-5843
phone 949.261.1022 fax 949.260.3299

Chain of Custody Record

eurofins

Regulatory Program: ☐ DW ☐ NPDES ☐ RCRA ☑ Other:

TestAmerica Laboratories, Inc. d/b/a Eurofins TestAmerica

	Project Manager: Anthony Kalis		COC No:
Client Contact	**Email: anthony.kalis@nrg.com**	**Site Contact: Anthony Kalis** / **7/30/2024**	1 of 1 COCs
Carlsbad Energy Center	**Tel/Fax: 760-427-2382 / Fax #: None**	**Lab Contact: Rossina Tomova** / **Carrier: Eurofins**	TALS Project #:
4950 Avenida Encinas	**Analysis Turnaround Time**		Sampler: Anthony Kalis
Carlsbad, CA 92008	☐ CALENDAR DAYS ☑ WORKING DAYS		**For Lab Use Only:**
Phone: (760) 427-2382	TAT if different from Below ________		Walk-in Client:
FAX - None	☐ 2 weeks		Lab Sampling:
Project Name: EWA Quarterly Sampling	☑ 1 week		
Site: Carlsbad Energy Center	☐ 2 days		Job / SDG No.:
PO # : Use Credit Card	☐ 1 day		

	Sample Identification	Sample Date	Sample Time	Sample Type (C=Comp, G=Grab)	Matrix	# of Cont.	Filtered Sample (Y / N)	Perform MS / MSD (Y / N)	200.7 - (MOD) California Admin Manual L; 245.1 - Hg	2540D - TSS; SM5210B_BOD Calc-BOD, 5 Day	2540C_Calcd-TDS	1664A - Oil & Grease (HEM Only)	Field pH	Sample Specific Notes:
17	Sample Point # 1 - O&G Grab 1-16	7/30/2024	9:23	G	H20	16	N	Y	-	-	-	X-16	X	Composite the 16 Oil & Grease samples & perform duplicates
34	Sample Point # 2 - O&G Grab 18-33	7/30/2024	9:38	G	H2O	16	N	Y	-	-	-	X-16	X	Composite the 16 Oil & Grease samples & perform duplicates

570-193455 Chain of Custody

	Sample Point # 1/ Time	Sample Point # 2/ time
Field pH 1	6.51 pH/28.5°C @ 0923	7.34 pH/29.4°C @ 0938

Preservation Used: 1= Ice, 2= HCl; 3= H2SO4; 4=HNO3; 5=NaOH; 6= Other ________ 1/3

Possible Hazard Identification:
Are any samples from a listed EPA Hazardous Waste? Please List any EPA Waste Codes for the sample in the Comments Section if the lab is to dispose of the sample.
☑ Non-Hazard ☐ Flammable ☐ Skin Irritant ☐ Poison B ☐ Unknown

Sample Disposal (A fee may be assessed if samples are retained longer than 1 month)
☐ Return to Client ☑ Disposal by Lab ☐ Archive for________ Months

Custody Seals Intact: ☐ Yes ☐ No | Custody Seal No.: | Cooler Temp. (°C): Obs'd: 0.8 Corr'd: 0.8 Therm ID No.: SC12

Relinquished by:	Company:	Date/Time:	Received by:	Company:	Date/Time:
[signature]	NRG	7/30/24 1005	[signature]	KAHAM	7/30/24 1005
[signature]	KAHAM	7/31/24 0707			
			Received in Laboratory by: [signature]	R	7/31/24 0707

Form No. CA-C-WI-002, Rev. 4.25, dated 7/8/2019

ATSO

8/8/2024

Login Sample Receipt Checklist

Client: Carlsbad Energy Center

Job Number: 570-193455-1

Login Number: 193455
List Number: 1
Creator: Vitente, Precy

List Source: Eurofins Calscience

Question	Answer	Comment
Radioactivity wasn't checked or is </= background as measured by a survey meter.	N/A	
The cooler's custody seal, if present, is intact.	True	
Sample custody seals, if present, are intact.	True	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time (excluding tests with immediate HTs)	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	True	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is <6mm (1/4").	True	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	
Residual Chlorine Checked.	N/A	

Eurofins TestAmerica, Irvine
17461 Derian Avenue
Suite 100
Irvine, CA 92614-5843
phone 949.261.1022 fax 949.260.3299

Chain of Custody Record

eurofins Environment Testing TestAmerica

Regulatory Program: ☐ DW ☐ NPDES ☐ RCRA ☑ Other:

TestAmerica Laboratories, Inc. d/b/a Eurofins TestAmerica

Client Contact	Project Manager: Anthony Kalis	Site Contact: Anthony Kalis	7/30/2024	COC No:
Carlsbad Energy Center	Email: anthony.kalis@nrg.com	Lab Contact: Rossina Tomova	Carrier: Eurofins	___1___ of ___1___ COCs
4950 Avenida Encinas	Tel/Fax: 760-427-2382 / Fax #: None			TALS Project #:
Carlsbad, CA 92008	Analysis Turnaround Time			Sampler: Anthony Kalis
Phone: (760) 427-2382	☐ CALENDAR DAYS ☑ WORKING DAYS			For Lab Use Only:
FAX - None	TAT if different from Below _____			Walk-in Client:
Project Name: EWA Quarterly Sampling	☐ 2 weeks			Lab Sampling:
Site: Carlsbad Energy Center	☑ 1 week			Job / SDG No.:
PO # : Use Credit Card	☐ 2 days			
	☐ 1 day			

Sample Identification	Sample Date	Sample Time	Sample Type (C=Comp, G=Grab)	Matrix	# of Cont.	Filtered Sample (Y / N)	Perform MS / MSD (Y / N)	200.7 - (MOD) California Admin Manual L; 245.1 - Hg	2540D - TSS; SM5210B_BOD Calc-BOD, 5 Day	2540C_Calcd-TDS	1664A - Oil & Grease (HEM Only)	Field pH	Sample Specific Notes:
Sample Point # 1 - O&G Grab	7/30/2024	9:23	G	H20	16	N	Y	-	-	-	X-16	X	Composite the 16 Oil & Grease samples & perform duplicates
Sample Point # 2 - O&G Grab	7/30/2024	9:38	G	H2O	16	N	Y	-	-	-	X-16	X	Composite the 16 Oil & Grease samples & perform duplicates

	Sample Point # 1/ Time	Sample Point # 2/ time
Field pH 1	6.51 pH/28.5°C @ 0923	7.34 pH/29.4°C @ 0938

Preservation Used: 1= Ice, 2= HCl; 3= H2SO4; 4=HNO3; 5=NaOH; 6= Other _____

1/3

Possible Hazard Identification:
Are any samples from a listed EPA Hazardous Waste? Please List any EPA Waste Codes for the sample in the Comments Section if the lab is to dispose of the sample.

☑ Non-Hazard ☐ Flammable ☐ Skin Irritant ☐ Poison B ☐ Unknown

Sample Disposal (A fee may be assessed if samples are retained longer than 1 month)

☐ Return to Client ☑ Disposal by Lab ☐ Archive for_____ Months

Custody Seals Intact: ☐ Yes ☐ No | Custody Seal No.: | Cooler Temp. (°C): Obs'd:_____ Corr'd:_____ Therm ID No.:_____

Relinquished by:	Company: WRA	Date/Time: 7/30/24 1008	Received by:	Company: RHAM	Date/Time: 7/30/24 1008
Relinquished by:	Company:	Date/Time:	Received by:	Company:	Date/Time:
Relinquished by:	Company:	Date/Time:	Received in Laboratory by:	Company:	Date/Time:

Carlsbad Energy Center

pH METER CALIBRATION AND ANALYSIS

Method SM 4500-H+B

Project: EWA Sampling

Meter: Fischer Scientific Accumet AP115

Date: 7/30/24

Start Time: 0857

pH Standards

	MFR	Exp. Date	Lot No.	pH	Temperature
4 Buffer	HACH	01/28	A4025	4.00	22.1 °C
7 Buffer	HACH	01/26	A4017	7.00	22.1 °C
10 Buffer	HACH	01/25	A4025	10.00	22.2 °C
mv/pH reading / 59 mv/pH =		97.2 % slope			
off set mv = -8.4 mv					

Potable Water pH		7.92	22.3 °C

Sampling and Analysis

Sample Point	Time	pH	Temperature
Sample Point #1	0923	6.51	28.5 °C
Sample Point #2	0938	7.34	29.4 °C

Standards Check After Analysis

pH Standards

pH Buffer	Time	pH	Temperature
Potable Water	1001	7.89	21.9 °C
pH 7.0	1002	7.01	22.1 °C

Comments:

End Time: 1003

Sampling and Analyses by: Anthony Kalis

Approved by: Anthony Kalis

Carlsbad Energy Center LLC
4950 Avenida Encinas
Carlsbad, CA 92008
Phone: 760-710-3970

July 3, 2024

Mr. William Svec
Compliance Project Manager
Encina Wastewater Authority
6200 Avenida Encinas
Carlsbad, California 92011

RE: CARLSBAD ENERGY CENTER PROJECT, SEMI ANNUAL COMPLIANCE STATUS REPORT – JANUARY THROUGH JUNE 2024

Dear Mr. Svec:

Carlsbad Energy Center LLC ("Project Owner") submits the attached semi-annual compliance status report covering the time period of January 2024 through June 2024. This report is submitted in compliance with Section B, Condition 2 of permit number 2405. The results for the self-monitoring sampling events for the First and Second Quarter reports of 2024 have already been submitted to the Encina Wastewater Authority but are included with this report as well.

If you have any questions or comments, please do not hesitate to contact Paul Mattesich at (760) 710-3945.

Sincerely,

Paul Mattesich
Plant Manager
Carlsbad Energy Center LLC

Attached:
- Report Certification
- 1SA2024 EWA Compliance Status Report for Permit 2405
- Permit List for Carlsbad Energy Center
- Carlsbad Energy Center EWA Sampling 1st Quarter 2024 Report
- Carlsbad Energy Center EWA Sampling 2nd Quarter 2024 Report
- Excel files for 1Q2024 and 2Q2024 Sample Data (Email Only, not Hard Copy)
- Carlsbad Energy Center Logbook EWA Daily Flow 1SA 2024

Cc: File

ENCINA WASTEWATER AUTHORITY

6200 AVENIDA ENCINAS, CARLSBAD, CA 92011-0195 TEL:(760)438-3941 FAX:(760)476-9852

REPORTING PERIOD:
(JANUARY 1 – JUNE 30)
JULY 1 – DECEMBER 31

COMPLIANCE STATUS REPORT (CSR)

I. INDUSTRIAL USER INFORMATION:

Carlsbad Energy Center			
Industrial User Name			
4950 Avenida Encinas	Carlsbad	CA	760-710-3945
Facility Address	City	Zip Code	(Area Code) Phone
Carlsbad Energy Center LLC			
Owner			
Paul Mattesich		Plant Manager	
IU Contact		Title	
City of Carlsbad	2405	4941	
Member Agency	Permit #	SIC Code	

II. ARE PROCESS OR OPERATIONAL CHANGES BEING PLANNED OR IMPLEMENTED?

YES (NO)

If yes, explain: _____

III. LIST OF ALL ACTIVE ENVIRONMENTAL PERMIT(S), PERMIT #(S), DATE ISSUED AND EXPIRATION DATE:

See Attached

IV. FLOW SUMMARY

→ **INCOMING WATER SOURCE**
AVERAGE DAILY FLOW RATE: 18,285 gpd
MAXIMUM DAILY FLOW RATE: 178,697 gpd

→ **PROCESS DISCHARGE TO SANITARY SEWER**
AVERAGE DAILY FLOW RATE: 3,636 gpd
MAXIMUM DAILY FLOW RATE: 41,358 gpd

CONSUMPTION HAS STAYED THE SAME INCREASED OR (DECREASED) BY MORE THAN 10% FROM THE LAST CSR.
If change indicated, explain: Incoming consumption has decreased due to the plant generating less megawatts over this semi-annual period than the previous period, which correlates to a lower average daily discharge flow rate.

V. THE FOLLOWING HAS BEEN INCLUDED:

(YES) NO NA RESULTS OF SELF MONITORING PERFORMED ON 01/9/24, 05/22/24

VI. COMPLIANCE STATUS REPORT CERTIFICATION STATEMENT

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

[signature]	7/2/24	CARLSBAD
PRESIDENT/VP/GENERAL MGR/CEO	DATE	CITY OR COUNTY

(Print and sign name)
PAUL MATTESICH

ENCINA WASTEWATER AUTHORITY

6200 AVENIDA ENCINAS, CARLSBAD, CA 92011-0195 TEL:(760)438-3941 FAX:(760)476-9852

REPORT CERTIFICATION

I. INDUSTRIAL USER INFORMATION:

Carlsbad Energy Center LLC
Industrial User Name

4950 Avenida Encinas	Carlsbad	92008	760-710-3945
Facility Address	City	Zip Code	(Area Code) Phone

Carlsbad Energy Center LLC
Owner

Paul Mattesich	Plant Manager
IU Contact	Title

City of Carlsbad	2405
Member Agency	Permit #

II. CERTIFICATION STATEMENT:

All applications, reports or information submitted to the Encina Wastewater Authority must include the following certification statement and be signed as required by a responsible corporate officer, President, Vice President, Manager, CEO or an authorized representative.

CERTIFICATION STATEMENT

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

PAUL MATTESICH

	7/2/24	CARLSBAD
PRESIDENT/VP/GENERAL MGR/CEO (Print and sign name)	DATE	CITY OR COUNTY

Carlsbad Energy Center LLC
4950 Avenida Encinas
Carlsbad, CA 92008
Phone: 760-710-3970

October 9, 2024

Mr. William Svec
Compliance Project Manager
Encina Wastewater Authority
6200 Avenida Encinas
Carlsbad, California 92011

RE: CARLSBAD ENERGY CENTER PROJECT, SEMI ANNUAL COMPLIANCE STATUS REPORT – JULY THROUGH JANUARY 2025

Dear Mr. Svec:

Carlsbad Energy Center LLC ("Project Owner") submits the attached semi-annual compliance status report covering the time period of July 2024 through January 2025. This report is submitted in compliance with Section B, Condition 2 of permit number 2405. The self-monitoring sampling event results for the Third Quarter report of 2024 has already been submitted to the Encina Wastewater Authority but are included with this report as well. The reason for the early submittal of the Semi-Annual Compliance Status Report is the Carlsbad Energy Center EWA Permit was issued a Best Management Practices (BMP) Permit on August 28, 2024 that became effective on September 5, 2024.

If you have any questions or comments, please do not hesitate to contact Paul Mattesich at (760) 710-3945.

Sincerely,

Paul Mattesich
Plant Manager
Carlsbad Energy Center LLC

Attached:
Report Certification
2SA2024 EWA Compliance Status Report for Permit 2405
Permit List for Carlsbad Energy Center
Carlsbad Energy Center EWA Sampling 3rd Quarter 2024 Report
Excel file for 3Q2024 Sample Data (Email Only, not Hard Copy)
Carlsbad Energy Center Logbook EWA Daily Flow 2SA 2024 (3rd Quarter Only)

Cc: File

ENCINA WASTEWATER AUTHORITY

6200 AVENIDA ENCINAS, CARLSBAD, CA 92011-0195 TEL:(760)438-3941 FAX:(760)476-9852

REPORTING PERIOD:
JANUARY 1 – JUNE 30
JULY 1 – DECEMBER 31

COMPLIANCE STATUS REPORT (CSR)

I. INDUSTRIAL USER INFORMATION:

Carlsbad Energy Center			
Industrial User Name			
4950 Avenida Encinas	Carlsbad	CA	760-710-3945
Facility Address	City	Zip Code	(Area Code) Phone
Carlsbad Energy Center LLC			
Owner			
Paul Mattesich		Plant Manager	
IU Contact		Title	
City of Carlsbad	2405	4941	
Member Agency	Permit #	SIC Code	

II. ARE PROCESS OR OPERATIONAL CHANGES BEING PLANNED OR IMPLEMENTED?

YES (NO)

If yes, explain: _____

III. LIST OF ALL ACTIVE ENVIRONMENTAL PERMIT(S), PERMIT #(S), DATE ISSUED AND EXPIRATION DATE:

See Attached

IV. FLOW SUMMARY

→ **INCOMING WATER SOURCE**
AVERAGE DAILY FLOW RATE: 43,096 gpd
MAXIMUM DAILY FLOW RATE: 180,919 gpd

→ **PROCESS DISCHARGE TO SANITARY SEWER**
AVERAGE DAILY FLOW RATE: 8,345 gpd
MAXIMUM DAILY FLOW RATE: 26,412 gpd

CONSUMPTION HAS STAYED THE SAME (INCREASED) OR DECREASED BY MORE THAN 10% FROM THE LAST CSR.
If change indicated, explain: Incoming consumption has increased due to the plant generating more megawatts over this semi-annual (quarter) period than the previous period, which correlates to a higher daily average discharge flow rate.

V. THE FOLLOWING HAS BEEN INCLUDED:

(YES) NO NA RESULTS OF SELF MONITORING PERFORMED ON 07/30/24

VI. COMPLIANCE STATUS REPORT CERTIFICATION STATEMENT

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

[signature]	10/9/24	CARLSBAD
PRESIDENT/VP/GENERAL MGR/CEO	DATE	CITY OR COUNTY

(Print and sign name)
PAUL MATTESICH

ENCINA WASTEWATER AUTHORITY

6200 AVENIDA ENCINAS, CARLSBAD, CA 92011-0195 TEL:(760)438-3941 FAX:(760)476-9852

REPORT CERTIFICATION

I. INDUSTRIAL USER INFORMATION:

Carlsbad Energy Center LLC			
Industrial User Name			
4950 Avenida Encinas	Carlsbad	92008	760-710-3945
Facility Address	City	Zip Code	(Area Code) Phone
Carlsbad Energy Center LLC			
Owner			
Paul Mattesich		Plant Manager	
IU Contact		Title	
City of Carlsbad	2405		
Member Agency	Permit #		

II. CERTIFICATION STATEMENT:

All applications, reports or information submitted to the Encina Wastewater Authority must include the following certification statement and be signed as required by a responsible corporate officer, President, Vice President, Manager, CEO or an authorized representative.

CERTIFICATION STATEMENT

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

PAUL MATTESICH	10/9/24	CARLSBAD
PRESIDENT/VP/GENERAL MGR/CEO (Print and sign name)	DATE	CITY OR COUNTY

Attachment H TLSN-3: Transmission Line Activities

Carlsbad Energy Center LLC
4950 Avenida Encinas
Carlsbad, CA 92008
Phone: 760-710-3970

March 17, 2025

Subject: CARLSBAD ENERGY CENTER COM-8 REPORT – TLSN-3: Transmission Line Activities

Through visual inspection, Carlsbad Energy Center has determined that all transmission equipment is in compliance with section 2492 of the Public Resources Code and Section 1250 of Title 14 of the California Code of Regulations.

Attachment I VIS-1: Surface Treatment Summary

Carlsbad Energy Center Project - Major Surface Treatment					
Unit	Equipment/System	Color/Finish	Current Condition	2024 Maintenance Activities	Planned 2025 Maintenance Activities
6	Selective Catalytic Reduction	Gray	Good	None	None Planned
6	Stack	Gray	Good	None	None Planned
6	Intercooler	Black	Good	None	None Planned
6	VBV Stack	Gray	Good	None	None Planned
6	Combustion Turbine Enclosure	Gray	Good	None	None Planned
6	CT Air Inlet	Gray	Visible Rusting on West/East Sides	None	Planning to Repaint - Budget Dependent
6	PCM	Gray	Good	None	None Planned
6/7	RAW Water Lines	Purple	Good	None	Planning to Repaint - Budget Dependent
6/7	PDC	Gray	Good	None	None Planned
6/7	CEMS Shack	Gray	Good	None	None Planned
7	Selective Catalytic Reduction	Gray	Good	None	None Planned
7	Stack	Gray	Good	None	None Planned
7	Intercooler	Black	Good	None	None Planned
7	VBV Stack	Gray	Good	None	None Planned
7	Combustion Turbine Enclosure	Gray	Good	None	None Planned
7	CT Air Inlet	Gray	Visible Rusting on West/East Sides	None	Planning to Repaint - Budget Dependent
7	PCM	Gray	Good	None	None Planned
8	Selective Catalytic Reduction	Gray	Good	None	None Planned
8	Stack	Gray	Good	None	None Planned
8	Intercooler	Black	Good	None	None Planned
8	VBV Stack	Gray	Good	None	None Planned

8	Combustion Turbine Enclosure	Gray	Good	None	None Planned
8	CT Air Inlet	Gray	Visible Rusting on West/East Sides	None	Planning to Repaint - Budget Dependent
8	PCM	Gray	Good	None	None Planned
8/9	Raw Water Lines	Purple	Good	None	Planning to Repaint - Budget Dependent
8/9	PDC	Gray	Good	None	None Planned
8/9	CEMS Shack	Gray	Good	None	None Planned
9	Selective Catalytic Reduction	Gray	Good	None	None Planned
9	Stack	Gray	Good	None	None Planned
9	Intercooler	Black	Good	None	None Planned
9	VBV Stack	Gray	Good	None	None Planned
9	Combustion Turbine Enclosure	Gray	Good	None	None Planned
9	CT Air Inlet	Gray	Visible Rusting on West/East Sides	None	None Planned
9	PCM	Gray	Good	None	None Planned
10	Selective Catalytic Reduction	Gray	Good	None	None Planned
10	Stack	Gray	Good	None	None Planned
10	Intercooler	Black	Good	None	None Planned
10	VBV Stack	Gray	Good	None	None Planned
10	Combustion Turbine Enclosure	Gray	Good	None	None Planned
10	CT Air Inlet	Gray	Visible Rusting on West/East Sides	None	None Planned
10	Raw Water Lines	Purple	Good	None	Planning to Repaint - Budget Dependent
10	PCM	Gray	Good	None	None Planned
10	CEMS Shack	Gray	Good	None	None Planned
10/BOP	PDC	Gray	Good	None	None Planned

BOP	Fuel Gas Compressor A	Gray	Good	None	Paint ACHE Fan Structure
BOP	Fuel Gas Compressor B	Gray	Good	Painted ACHE Fan Structure	None Planned
BOP	Fuel Gas Compressor C	Gray	Good	None	None Planned
BOP	Fuel Gas Compressor D	Gray	Good	None	None Planned
BOP	Raw Water Tank	Gray	Good	Painted Some Assocaited Piping Purple	None Planned
BOP	Raw Water Lines	Purple	Good	Painted different shade of purple	None Planned
BOP	Demin Water Tank	Gray	Good	None	None Planned
BOP	Fire Pump Structure	Gray	Good	None	None Planned
Common	Raw Water Lines	Purple	Good	Painted different shade of purple	None Planned
Common	Administrative Building	Tate Olive	Good	None	None Planned
Common	Warehouse	Tate Olive	Good	None	None Planned
Common	Existing Control House	Galvanized Steel	Minor surface rust	None	None Planned
Common	Transmission Poles	Galvanized	Good	None	None Planned
Common	Transmission Conductor Lines	Non-Reflective	Good	None	None Planned
Common	Transmission Line Insulators	Non-Reflective	Good	None	None Planned
Common	Perimeter Fence	Galvanized	Good	None	None Planned

Attachment J VIS-2/VIS-3: Landscape Maintenance Summary

Carlsbad Energy Center LLC
4950 Avenida Encinas
Carlsbad, CA 92008
Phone: 760-710-3970

March 17, 2025

Subject: CARLSBAD ENERGY CENTER COM-8 REPORT – VIS-2/VIS-3: Landscape Maintenance Summary

Carlsbad Energy Center contracts with Land Care for routine landscape activities. The activities include weekly maintenance for weeding services and removal or pruning of any downed branches found on the site. Services that Land Care provided for 2024 are:

- February: clear vegetation around the water discharge to bioswale
- March: Tree removal from fence line, a motor vehicle from Interstate 5 south broke the perimeter fence and downed trees
- April: Refilled African Daisies (Osterspermum) on north/east slopes
- June: Repaired lateral breaks on north/east slopes
- August: Vegetation cut down and removal in bioswale ponds and clearing walkways around bioswale
- November: Replaced one bad valve and added risers to some sprinkler rotors
- Clearing of multiple fallen eucalyptus branches north of the bioswale

Attachment K WASTE-9: Waste Generation Report

Hazardous Waste 2024

NON-RCRA	codes	lbs	comments
Oily debris	352	2990	from regular operations
Oily water 90%oil	223	1600	from regular operations
Used oil filters	352	1500	from regular operations
Empty containers	513	5	
	TOTAL	6095	

RCRA	codes	lbs	comments
oil w/benzene	D018, 221	2560	from regular operations
oily debris w/benzene	D018, 181	100	from regular operations
filters w/benzene	D018, 352	250	from regular operations
Spent dessicant	181	5	from regular operations
	TOTAL	2915	

Grand Total 9010

Attachment L Compliance Matrix

Carlsbad Energy Center Project
Compliance Matrix: 2023

Technical Area	COC Number	Subtask	Deliverable Req.	Description	Verification/Action/Submittal Required	Required Prior to Start of Construction?	Action Days	Submittal Timing	Submittal Trigger Event	Compliance Status	Comments
AQ	**1**		Y	~~The equipment authorized to be constructed under this permit is described in Application Nos. APCD2014-APP-003480, APCD2014-APP-003481, APCD2014-APP-003482, APCD2014-APP-003483, APCD2014-APP-003484, APCD2014-APP-003485, APCD2014-APP-003486, APCD2014-APP-003487.~~Only SuperCores with serial numbers 878-162, 878-176, 878-186, 878-187, 878-188, 878-191, 878-119, and 878-129 may be used in any of the five combustion turbine generators at this site, as specified in Permit to Operate Nos. APCD2022-PTO-004219, APCD2022-PTO-004220, APCD2022-PTO-004221, APCD2022-PTO-004222, and APCD2022-PTO-004223.	The project owner shall provide copies of any applications to alter the equipment or the permit conditions for the equipment covered by the permit applications numbered above to the CPM within 5 days of sending such applications to the District. The project owner shall make the site available for inspection of equipment and records by representatives of the District, ARB, and the Energy Commission.	N	5	after	Submittal of Applications to Alter Equipment or permit conditions for the permitted equipment to the District	Ongoing	Amended in 2024
AQ	**2**			~~The project owner shall cancel all applications for permits and/or retire all permits to operate for all of the equipment authorized to be constructed under this permit on or before the date construction commences for any equipment authorized for construction under Application Numbers APCD2007-APP-985745, APCD2007-APP-985747, or APCD2007-APP-985748 (the Licensed CECP).~~A replacement SuperCore Model 878 for the General Electric LMA-100-PA combustion turbine generator may be used in any of the five combustion turbine generators at this site, as specified in Permit to Operate Nos. APCD2022-PTO-004219, APCD2022-PTO-004220, APCD2022-PTO-004221, APCD2022-PTO-004222, and APCD2022-PTO-004223, for a maximum of 180 days, unless otherwise approved in writing by the District, while one of the SuperCores with serial numbers 878-162, 878-176, 878-186, 878-187, 878-188, 878-191, 878-119, or 878-129 is undergoing maintenance or repairs. The District's Compliance Division shall be notified, in writing, within 24 hours or ordering the replacement SuperCore from a vendor but no later than 24 hours prior to the installation of the replacement SuperCore. The District's Compliance Division shall also be notified, in writing, within 24 hours of scheduling the re-installation of the permitted SuperCore which underwent maintenance or repairs but no later than 24 hours prior to its re-installation.	~~This condition requires canceling the amended CECP permit applications if the project owner decides to build the previously licensed CECP. The project owner shall provide to the CPM documentation of the cancellation of the 2014 permit applications, if the project approved under the 2007 permit applications is built, by the time any construction activity approved under the 2007 permit applications commences.~~ The project owner shall notify the CPM within five working days of notifying the District that a SuperCore has been replaced. The project owner shall make the site available for inspection of equipment and records by representatives of the District, ARB, and the Energy Commission.	N	5	after	Cancellation of the 2014 permit applications	Ongoing	Amended in 2024
~~**AQ**~~	~~**4**~~		~~N~~	~~Prior to the earliest initial startup date for any of the combustion turbines, the project owner shall surrender to the District Class A Emission Reduction Credits (ERCs) in an amount equivalent to 47.94 tons per year of oxides of nitrogen (NOx) to offset the net maximum allowable increase of 39.9 tons per year of NOx emissions for the equipment described in District Application Nos. APCD2014-APP-003480, APCD2014-APP-003481, APCD2014-APP-003482, APCD2014-APP-003483, APCD2014-APP-003484, APCD2014-APP-003485, APCD2014-APP-003486, APCD2014-APP-003487. [Rule 20.3(d)(8)]~~	~~The project owner shall submit to the CPM, within 15 days of ERC surrender to the District, information demonstrating compliance with this condition.~~	~~N~~	~~15~~	~~after~~	~~ERC Surrender~~	Deleted	Deleted in 2024
AQ	**5**		N	This equipment shall be properly maintained and kept in good operating condition at all times and, to the extent practicable, the project owner shall maintain and operate the equipment and any associated air pollution control equipment in a manner consistent with good air pollution control practices for minimizing emissions. [Rule 21 and 40 CFR §60.11]	The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	N	as needed	N/A	Inspections	Ongoing	
~~**AQ**~~	~~**6**~~		~~N~~	~~The project owner shall operate the project in accordance with all data and specifications submitted with the application under which this license is issued and District Application Nos. 2014-APP-003480, 2014-APP- 003481, 2014-APP-003482, 2014-APP-003483, 2014-APP-003484, 2014- APP-003485, 2014-APP-003486, and 2014-APP-003487. [Rule 14]~~	~~The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.~~	~~N~~	~~as needed~~	~~N/A~~	~~Inspections~~	Deleted	Deleted in 2024
AQ	**7**		N	~~The project owner shall provide~~ Access, facilities, utilities, and any necessary safety equipment, with the exception of personal protective equipment requiring individual fitting and specialized training, for source testing and inspection **shall be provided** upon request of the Air Pollution Control District. ~~[Rule 19]~~	The project owner shall provide facilities, utilities, and safety equipment for source testing and inspections upon request of the District, ARB, and the Energy Commission.	N	as needed	N/A	Source Testing/Inspections	Ongoing	Amended in 2024
~~**AQ**~~	~~**8**~~	~~a~~	~~Y~~	~~The project owner shall obtain any necessary District permits for all ancillary combustion equipment including emergency engines, prior to on-site delivery of the equipment. [Rule 10]~~	~~The project owner shall submit any proposed air permit modification to the CPM within five working days of its submittal either by 1) the project owner to an agency, or 2) receipt of proposed modifications from an agency.~~	~~Y/N~~	~~5~~	~~within~~	~~Submittal~~	Deleted	Deleted in 2024
~~**AQ**~~	~~**8**~~	~~b~~	~~Y~~		~~The project owner shall submit all modified air permits to the CPM within 15 days of receipt.~~	~~N~~	~~15~~	~~after~~	~~Air Permit Modification~~	Deleted	Deleted in 2024
AQ	**9**		N	A rolling 12-calendar-month period is one of a series of successive consecutive 12-calendar-month periods. The initial 12-month-calendar period of such a series shall begin on the first day of the month in which the applicable beginning date for that series occurs as specified in this permit. [**Rule 20.3 (d)(1),** Rule 20.3 (d)(3), ~~Rule 20.3(d)(8) and~~ Rule 21]	None required	N	N/A	N/A	None	N/A	Amended in 2024
AQ	**10**	a	Y	Pursuant to 40 CFR §72.30(b)(2)(ii) of the Federal Acid Rain Program, the project owner shall submit an application for a Title IV Operating Permit at least 24 months prior to the date the first turbine commences operation as defined in 40 CFR §72.2.. [40 CFR Part 72]	submit an application for a Title IV Operating Permit at least 24 months prior to the initial startup of the combustion turbines	N	24 Months	Prior to	Initial Startup	Completed	

Carlsbad Energy Center Project
Compliance Matrix: 2023

Technical Area	COC Number	Subtask	Deliverable Req.	Description	Verification/Action/Submittal Required	Required Prior to Start of Construction?	Action Days	Submittal Timing	Submittal Trigger Event	Compliance Status	Comments
AQ	**10**	b	Y		The project owner shall submit to the CPM copies of the acid rain permit application within five working days of its submittal by the project owner to the District.	N	5	within	Submittal	Completed	
AQ	**11**		Y	The project owner shall comply with all applicable provisions of 40 CFR Part 73, including requirements to offset, hold and retire sulfur dioxide (SO2) allowances. [40 CFR Part 73]	The project owner shall submit to the CPM and the District the combustion turbine generator (CTG) annual SO2 emission total and SO2 allowance information demonstrating compliance with all applicable provisions of 40 CFR 73 as part of the Quarterly Operation Reports (AQ-SC8).	N	N/A	Quarterly	Quarterly Operation Reports	Ongoing	
AQ	**12**		N	**The project owner shall maintain a**All records required by this permit**,** ~~shall be maintained~~ **including any calibration, maintenance, and other supporting information and copies of all reports required by this permit for at least five years from the date of their creation. Such records shall be maintained** on site for a minimum of three~~five~~ years**. Records required by this permit shall be considered as being maintained "on-site" if records for the previous 12-month period are available at the stationary source and any additional records are maintained at a location to be specified by the source** and made **readily** available to the District upon request. [Rule 1421**, Rule 21**]	The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	N	N/A			Ongoing	Amended in 2024
~~**AQ**~~	~~**13**~~		~~**Y**~~	~~The fire pump and emergency diesel engines shall not be operated for maintenance and testing purposes at the same time that any combustion turbine is operating during a commissioning period. [Rule 20.3(d)(2)]~~	~~The project owner shall maintain records of the fire-pump and emergency diesel engine operation during the combustion turbine initial commissioning period that shows compliance with this condition and shall provide that data with the Monthly Compliance Reports required during any commissioning period.~~	~~N~~	~~N/A~~	~~Monthly~~	~~Monthly Compliance Report~~	Deleted	Deleted in 2024
AQ	**13a**			**Tuning operations shall be defined as adjustments to the combustion systems and/or emissions control equipment that involves operating the equipment in a manner such that the emissions control equipment may not be fully effective or operational. Only one combustion turbine shall be tuned at any given time. The combined tuning operations for all combustion turbines operated at this stationary source shall not exceed 12 hours (720 minutes) in the calendar day nor exceed 65 hours in a calendar year. The District Compliance Division shall be notified at least 24 hours in advance of any tuning operations**	**The project owner shall maintain a log of tuning events and shall provide emissions summary data in compliance with this condition as part of the Quarterly Operations Reports (AQ-SC8). The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission**	N	as needed	Quarterly	Quarterly Operation Reports	Ongoing	Added in 2024
AQ	**14**		Y	~~For purposes of determining compliance with the emission limits of this permit, a~~**A** shutdown period is the **period of up to** 13-consecutive**clock**-minute**s prior to** ~~period preceding~~ the **clock minute that** ~~moment at which~~ fuel flow to the combustion turbine ceases**, excluding any clock minute in that shutdown period that is coincident with a startup period and any clock minute when the average gross electrical power output from the turbine is greater than 20 megawatts (MW). A shutdown period must contain at least one clock minute unless all minutes are coincident with a startup period**. [Rule 20.3 (d)(1)]	The project owner shall submit to the CPM the CTG shutdown event duration data demonstrating compliance with this condition as part of the Quarterly Operation Reports (AQ-SC8).	N	as needed	Quarterly	Quarterly Operation Reports	N/A	Amended in 2024
AQ	**15**		Y	**A startup occurs when fuel flow to the combustion turbine following a non-operational period. And u**Unless otherwise noted in a specific condition, a startup period is the period of time that begins **the clock minute** when fuel flows to the combustion turbine following a non-operational period **and includes each succeeding clock minute up to and including the clock minute that ends the startup period. If fuel ceases to flow to the combustion turbine during the 25-consecutive-clock-minute period beginning with the clock minute that begins the startup period, then the startup period ends on the clock minute immediately preceding the clock minute when fuel has ceased to flow, and all clock minutes that are in that 25-consecutive-clock-minute period prior to fuel ceasing to flow are part of that startup period**. For purposes of determining compliance with the emission limits of this permit, the duration of a startup period shall not exceed 25 consecutive **clock** minutes. [Rule 20.3(d)(1)]	The project owner shall submit to the CPM the CTG startup event duration data demonstrating compliance with this condition as part of the Quarterly Operation Reports (AQ-SC8).	N	as needed	Quarterly	Quarterly Operation Reports	N/A	Amended in 2024
AQ	**16**		N	A non-operational period is any five-consecutive-minute period when fuel does not flow to the combustion turbine. [Rule 20.3(d)(1)]	The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	N	as needed	N/A	Inspections	N/A	
AQ	**17**		N	A Continuous Emission Monitoring System (CEMS) protocol is a document approved in writing by the District that describes the methodology and quality assurance and quality control procedures for monitoring, calculating, and recording stack emissions from the combustion turbine that is monitored by the CEMS. [Rules ~~69.3~~, 69.3.1, and 20.3(d)(1) and 40 CFR Part 60 Subpart KKKK, and 40 CFR Part 75]	The project owner shall maintain a copy of the CEMS protocol on site and provide it for inspection on request by representatives of the District, ARB, and the Energy Commission.	N	as needed	N/A	Inspections	N/A	Amended in 2024

Technical Area	COC Number	Subtask	Deliverable Req.	Description	Verification/Action/Submittal Required	Required Prior to Start of Construction?	Action Days	Submittal Timing	Submittal Trigger Event	Compliance Status	Comments
~~**AQ**~~	~~**18**~~		~~N~~	~~For each combustion turbine, the commissioning period is the period of time commencing with the initial startup of that turbine and ending, after 213 hours of turbine operation, or the date the project owner notifies the District the commissioning period has ended. For purposes of this condition, the number of hours of turbine operation is defined as the total unit operating minutes during the commissioning period divided by 60 rounded to the nearest hundredth of an hour. [Rule 20.3(d)(1)]~~	~~The project owner shall provide commissioning event data that shows compliance with the commissioning period operation limits for each combustion turbine in the Monthly Compliance Reports and shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.~~	~~N~~	~~as needed~~	~~Monthly~~	~~MCR~~	Deleted	Deleted in 2024
~~**AQ**~~	~~**19**~~		~~N~~	~~For the purposes of this permit, initial startup shall be defined for each combustion turbine as the first time that the combustion turbine combusts fuel on-site. [Rule 20.3]~~	~~None required~~	~~N~~	~~NA~~			Deleted	Deleted in 2024
AQ	**20**		N	For each combustion turbine, a unit operating day, hour, and minute mean the following: A. A unit operating day means any calendar day in which the turbine combusts fuel. B. A unit operating hour means any clock hour in which the turbine combusts fuel. C. A unit operating minute means any clock minute in which the turbine combusts fuel and any clock minute that is part of a shutdown period. [Rule 21, 40 CFR Part 75, Rule 20.3(d)(1), 40 CFR Part 60 Subpart KKKK]	None Required	N	N/A			N/A	
AQ	**21**		Y	The exhaust stacks for each combustion turbine shall be at least 90 feet in height above site base elevation, and with an interior exhaust stack diameter of no more than 13.5 feet at the point of release unless it is demonstrated to the District that all requirements of District rules 20.3 and 1200 are satisfied with a different stack configuration. [Rules 20.3(d)(2) and 1200]	The project owner shall submit to the CPM for review the exhaust stack specification at least 60 days before initial construction of the stack.	N	60	Prior to	Equipment Construction	Completed	
AQ	**22**	a	Y	The combustion turbines shall be fired on Public Utility Commission (PUC) quality natural gas. The project owner shall maintain, on site, quarterly records of the natural gas sulfur content expressed in units of grains of sulfur compounds per 100 dscf of natural gas and hourly records of the higher and lower heating values of the natural gas expressed in Btu/scf. These records shall be provided to District personnel upon request. [Rule 20.3(d)(1)] Natural gas sulfur content records must be kept with a minimum reporting limit of 0.25 grains sulfur compounds per 100 dscf of natural gas. [Rule 20.3(d)(1)]	The project owner shall submit the quarterly fuel sulfur content values in the in the Quarterly Operation Reports (AQ-SC8)	N	N/A	Quarterly	Quarterly Operation Reports	Ongoing	
AQ	**22**	b	N		Make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	N	as needed	N/A	Inspections	Ongoing	
AQ	**23**		N	Unless otherwise specified in this permit, all continuous monitoring data shall be collected at least once every clock-minute. [Rules ~~69.3~~, 69.3.1, and 20.3(d)(1)]	None required.	N	N/A			Ongoing	Amended in 2024
AQ	**24**		Y	For purposes of determining compliance with emission limits based on source testing, the average of three subtests shall be used. For purposes of determining compliance with emission limits based on a Continuous Emission Monitoring System (CEMS), data collected in accordance with the CEMS protocol shall be used and the averages for averaging periods specified herein shall be calculated as specified in the CEMS protocol. [Rules ~~69.3~~, 69.3.1, 20.3(d)(1) and 40 CFR Part 60 Subpart KKKK, 40 CFR Part 60 Appendix B and F, and 40 CFR Part 75]	Source tests demonstrating compliance with this condition shall be provided to the CPM and are due within the timeframes specified in Conditions AQ-57 and AQ-58. CEMS data summaries shall be submitted to the CPM as part of the Quarterly Operation Reports (AQ-SC8).	N	N/A	Quarterly	Quarterly Operation Reports	Ongoing	Amended in 2024
AQ	**25**		Y	For purposes of determining compliance with emission limits based on CEMS data, all CEMS calculations, averages, and aggregates shall be performed in accordance with the CEMS protocol approved in writing by the District. [Rules ~~69.3~~, 69.3.1, 20.3(d)(1) and 40 CFR Part 60 Subpart KKKK, 40 CFR Part 60 Appendix B and F, and 40 CFR Part 75]	CEMS data summaries shall be submitted to the CPM as part of the Quarterly Operation Reports (AQ-SC8).	N	N/A	Quarterly	Quarterly Operation Reports	Ongoing	Amended in 2024
AQ	**26**		Y	For each emission limit expressed as pounds, pounds per hour, or parts per million based on a one-hour or less averaging period or compliance period, compliance shall be based on using data collected at least once every minute when compliance is based on CEMS data except as specified in the District approved CEMS Protocol. [Rules ~~69.3~~, 69.3.1, and 20.3(d)(1)]	CEMS data summaries shall be submitted to the CPM as part of the Quarterly Operation Reports (AQ-SC8).	N	N/A	Quarterly	Quarterly Operation Reports	Ongoing	Amended in 2024
AQ	**27**		Y	When a combustion turbine is combusting fuel (operating), the emission concentration of oxides of nitrogen (NOX), calculated as nitrogen dioxide (NO2), shall not exceed 2.5 parts per million by volume on a dry basis (ppmvd) corrected to 15**%** ~~percent~~ oxygen, averaged over a **1**~~one~~-clock-hour period, except during ~~commissioning,~~**tuning** ~~operations,~~ startup **periods**~~,~~ and **any clock minutes that are not excluded from,** shutdown periods for that turbine. **Any clock minutes excluded from a shutdown period shall be included in the 1-clock-hour average unless they are coincident with a startup period.** [Rule 20.3(d)(1)]	The project owner shall provide CEMS emissions data to demonstrate compliance with this condition as part of the Quarterly Operation Reports (AQ-SC8).	N	N/A	Quarterly	Quarterly Operation Reports	Ongoing	Amended in 2024

Technical Area	COC Number	Subtask	Deliverable Req.	Description	Verification/Action/Submittal Required	Required Prior to Start of Construction?	Action Days	Submittal Timing	Submittal Trigger Event	Compliance Status	Comments
AQ	**28**		Y	When a combustion turbine is operating, the emission concentration of carbon monoxide (CO) shall not exceed 4.0 ppmvd corrected to 15**%** ~~percent~~oxygen, averaged over a **1**~~one~~-clock-hour period, except during ~~commissioning,~~**tuning operations,** startup **periods**~~,~~ and **any clock minutes that are not excluded from** shutdown periods for that turbine. **Any clock minutes excluded from a shutdown period shall be included in the 1-clock-hour average unless they are coincident with a startup period** [Rule 20.3(d)(**2**~~1~~)]	The project owner shall provide CEMS emissions data to demonstrate compliance with this condition as part of the Quarterly Operation Reports (AQ-SC8).	N	N/A	Quarterly	Quarterly Operation Reports	Ongoing	Amended in 2024
AQ	**29**		Y	When a combustion turbine is operating, the volatile organic compound (VOC) concentration, calculated as methane, measured in the exhaust stack, shall not exceed 2.0 ppmvd corrected to 15**%** ~~percent~~ oxygen, averaged over a **1**~~one~~-clock-hour period, except during ~~commissioning,~~**tuning operations,** startup **periods**~~,~~ and **any clock minutes that are not excluded from** shutdown periods for that turbine. For purposes of determining compliance based on ~~the CEMS, the District approved VOC/CO surrogate relationship and the CO CEMS data averaged over a one-clock-hour period shall be used. The VOC/CO surrogate relationship shall be verified and/or modified, if necessary, based on source testing~~**source testing, an average of the three subtests shall be used**. [Rule 20.3(d)(1)]	The project owner shall provide the ~~CEMS~~**source test** data~~, using the appropriate CO/VOC surrogate relationship,~~ to demonstrate compliance with this condition as part of the Quarterly Operation Reports (AQ-SC8).	N	N/A	Quarterly	Quarterly Operation Reports	Ongoing	Amended in 2024
AQ	**30**		Y	When a combustion turbine is operating, the ammonia concentration (ammonia slip), shall not exceed 5.0 ppmvd corrected to 15**%** ~~percent~~oxygen and averaged over a **1**~~one~~-clock-hour period, except during ~~commissioning,~~**tuning operations, and** startup, and shutdown periods for that turbine. [Rule 1200]	The project owner shall provide the estimated ammonia concentrations and ammonia emissions based on the annual source test data, the CEMS data and SCR ammonia flow data to demonstrate compliance with this condition as part of the Quarterly Operation Reports (AQ-SC8).	N	N/A	Quarterly	Quarterly Operation Reports	Ongoing	Amended in 2024
AQ	**31**		Y	When a combustion turbine is operating, the emission concentration of NOX, calculated as nitrogen dioxide (NO2), shall not exceed 42 ppmvd averaged over each **1**~~one~~-clock-hour period and corrected to 15**%** ~~percent~~ oxygen**,** except for **tuning operations, and** startup and shutdown periods for that turbine, as defined in Rule 69.3.**1** [Rule 69.3]	The project owner shall provide CEMS emissions data to demonstrate compliance with this condition as part of the Quarterly Operation Reports (AQ-SC8).	N	N/A	Quarterly	Quarterly Operation Reports	Ongoing	Amended in 2024
AQ	**32**		Y	When a combustion turbine is operating with post-combustion air pollution control equipment that controls oxides of nitrogen (NOX) emissions, the emission concentration of NOX, calculated as nitrogen dioxide (NO2), shall not exceed 13.6 ppmvd averaged over each one-clock-hour period and corrected to 15**%** ~~percent~~ oxygen, except for **tuning operations, and** startup and shutdown periods for that turbine, as defined in Rule 69.3.1. This limit does not apply during any period in which the facility is subject to a variance from the emission limits contained in Rule 69.3.1. [Rule 69.3.1]	The project owner shall provide CEMS emissions data to demonstrate compliance with this condition as part of the Quarterly Operation Reports (AQ-SC8).	N	N/A	Quarterly	Quarterly Operation Reports	Ongoing	Amended in 2024
AQ	**33**		Y	When a combustion turbine is operating without any post-combustion air pollution control equipment that controls oxides of nitrogen (NOx) emissions, the emission concentration of NOx calculated as nitrogen dioxide (NO2) from each turbine shall not exceed 22.6 parts per million by volume on a dry basis (ppmvd) averaged over each **1**~~one~~-clock-hour period and corrected to 15**%** ~~percent~~ oxygen, except for **tuning operations, and** periods of startup and shutdown, as defined in Rule 69.3.1.~~ This limit does not apply during any period in which the facility is subject to a variance from the emission limits contained in Rule 69.3.1.~~ [Rule 69.3.1]	The project owner shall provide CEMS emissions data to demonstrate compliance with this condition as part of the Quarterly Operation Reports (AQ-SC8).	N	N/A	Quarterly	Quarterly Operation Reports	Ongoing	Amended in 2024

Technical Area	COC Number	Subtask	Deliverable Req.	Description	Verification/Action/Submittal Required	Required Prior to Start of Construction?	Action Days	Submittal Timing	Submittal Trigger Event	Compliance Status	Comments
AQ	**34**		Y	For each rolling four-unit operating hour period, average emission concentration of oxides of nitrogen (NOx) for each turbine calculated as nitrogen dioxide (NO2) in parts per million by volume dry (ppmvd) corrected to 15**%** ~~percent~~ oxygen or, alternatively, as elected by the project owner, the average NOx emission rate in pounds per megawatt-hour (lb/MWh) shall not exceed an average emission limit calculated in accordance with 40 CFR Section 60.4380(b)(3). The emission concentration and emission rate averages shall be calculated in accordance with 40 CFR Section 60.4380(b)(1). The average emission concentration limit and emission rate limit shall be based on an average of hourly emission limits over the four-unit operating hour period including the operating-hour and three unit operating-hours immediately preceding. For any unit operating hour where multiple emission standards would apply based on load of the turbine, the applicable standard shall be the higher of the two limits. The hourly emission concentration limit and emission rate limit shall be as follows based on the load of the turbine over the four unit operating hour period: Case Emission Limit, ppmvd at 15**%** ~~percent~~ O2 Emission Limit, lb/MWh i. All four hrs at or above 75% Load 15 0.43 ii. All four hrs below 75% Load 96 4.7 iii. Combination of hrs (a x 15+b x 96)/4 (a x 0.43+b x 4.7)/4 Where: a = the number of unit operating hrs in four hour period with all operation above 75% load and b = 4-a. The averages shall ~~exclude all clock hours occurring before the Initial Emission Source Test but shall~~ include emissions during all other times that the equipment is operating including, but not limited to, emissions during **tuning operations, and** startup and shutdown periods. For each six-calendar-month period, emissions in excess of these limits and monitor downtime shall be identified in accordance with 40 CFR Sections 60.4350 and 60.4380(b)(2), except that Section 60.4350(c) shall not apply for identifying periods in excess of a NOX concentration limit. For the purposes of this condition, unit operating hours shall have the meaning as defined in 40 CFR 60.4420. [40 CFR Part 60 Subpart KKKK]	The project owner shall provide CEMS emissions data to demonstrate compliance with this condition as part of the Quarterly Operation Reports (AQ-SC8).	N	N/A	Quarterly	Quarterly Operation Reports	Ongoing	Amended in 2024
AQ	**35**		Y	The emissions of particulate matter less than or equal to **10**~~ten~~ microns in diameter (PM10) from the exhaust stack~~s~~ of **each**~~the~~ combustion turbine shall not exceed 5.0 pounds per hour for each combustion turbine**, calculated as the arithmetic average of the most recent source test of eah turbine**. [Rule 20.3(d)(1)(2)]	Source tests demonstrating compliance with this condition shall be provided to the CPM and are due within the timeframes specified in Conditions AQ-57 and AQ-58.	N	45	after	Completion of RATA/Source Tests	Ongoing	Amended in 2024
AQ	**36**		Y	The emissions of particulate matter less than or equal to **10**~~ten~~ microns in diameter (PM10) from the exhaust stacks of the combustion turbines shall not exceed 3.5 pounds per hour per turbine, averaged over all **five**~~six~~ combustion turbines, calculated as the arithmetic average of the most recent source test for each turbine. [Rule 20.3(d)(1),(2)]	Source tests demonstrating compliance with this condition shall be provided to the CPM and are due within the timeframes specified in Conditions AQ-57 and AQ-58.	N	45	after	Completion of RATA/Source Tests	Ongoing	Amended in 2024
AQ	**37**		Y	The discharge of particulate matter from the exhaust stack of each combustion turbine shall not exceed 0.10 grains per dry standard cubic foot (0.23 grams/dscm) corrected to 12 percent carbon dioxide. The District may require periodic testing to verify compliance with this standard. [Rule 53]	Source tests demonstrating compliance with this condition shall be provided to the CPM and are due within the timeframes specified in Conditions AQ-57 and AQ-58.	N	45	after	Completion of RATA/Source Tests	Ongoing	
AQ	**38**		N	Visible emissions from the lube oil vents and the exhaust stack of each combustion turbine shall not exceed 20 percent opacity for more than three minutes in any period of 60 consecutive minutes. [Rule 50]	The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	N	as needed	N/A	Inspections	Ongoing	
AQ	**39**		Y	Mass emissions from each combustion turbine of oxides of nitrogen (NOx), calculated as NO2; carbon monoxide (CO); and volatile organic compounds (VOC), calculated as methane, shall not exceed the following limits, except during ~~commissioning~~**tuning operations**, startup **periods** and **any clock minutes that are not excluded from** shutdown periods for that turbine. A **1**~~one~~-clock-hour averaging period for these limits shall apply to CEMS data**, and any clock minutes excluded from a shutdown period shall be included in the 1-clock-hour average unless they are coincident with a startup period. For purposes of determining compliance based on source testing, an average of three subtests shall be used**. ~~[Rule 20.3(d)(2)]~~ Pollutant Emission Limit, lb/hr a. NOx 9.1 b. CO 8.8 c. VOC 2.5 **[Rule 20.3(d)(2)]**	The project owner shall submit to the CPM operating data demonstrating compliance with this condition as part of the Quarterly Operation Reports (AQ-SC8).	N	N/A	Quarterly	Quarterly Operation Reports	Ongoing	Amended in 2024

Technical Area	COC Number	Subtask	Deliverable Req.	Description	Verification/Action/Submittal Required	Required Prior to Start of Construction?	Action Days	Submittal Timing	Submittal Trigger Event	Compliance Status	Comments
AQ	**40**		Y	~~Excluding any minutes that are coincident with a shutdown period, c~~**C**umulative mass emissions of oxides of nitrogen (NOx), calculated as NO2; carbon monoxide (CO); and volatile organic compounds (VOC), calculated as methane, shall not exceed the following limits during any startup period, except during that turbine's commissioning period. ~~[Rule 20.3(d)(1)].~~ Pollutant Emission Limit,lb a. NOx 14.7 b. CO **17.3**~~7.4~~ c. VOC 2.0 **In addition, CO emissions from startups shall not exceed 34.6 pounds in each clock hour. Forpurposes of determining compliance with the limit of 34.6 pounds of CO from startups in each clock hour, for each startup, CO emissions shall be calculated as the sum of emissions occuring during all the minutes of the startup period for that startup and of the emissions occuring during all the minutes of the first shutdown period following that startup that are within 25 minutes of when fuel begins to flow. Furthermore, CO emissions for all combustion turbines combined from all operations shall not exceed 1691 pounds in each 24-consecutive-clock-hour period. For the purposes of determining compliance based on source testing, an average of three subtests shall be used.** [NOx and VOC: Rule 20.3(d)(1); CO: Rule 20.3(d)(2)]	The project owner shall submit to the CPM operating data demonstrating compliance with this condition as part of the Quarterly Operation Reports (AQ-SC8).	N	N/A	Quarterly	Quarterly Operation Reports	Ongoing	Amended in 2024
AQ	**41**		Y	**Excluding any clock minutes that are coincident with a startup period,** ~~C~~**c**umulative mass emissions from each combustion turbine of oxides of nitrogen (NOx), calculated as NO2; carbon monoxide (CO); and volatile organic compounds (VOC), calculated as methane, shall not exceed the following limits during each of that turbine's shutdown periods, except during that turbine's commissioning period. ~~[Rule 20.3(d)(1)]~~ Pollutant Emission Limit,lb a. NOx 0.6 b. CO 3.4 c. VOC 2.4 **In addition, the period prior to any restart of the combustion turbine consisting of a shutdown period of up to 13 consecutive clock minutes and a non-operational period of at least five clock minutes will be no less than a cumulative 18 consecutive clock minutes. [Rule 20.3(d)(1)]**	The project owner shall provide CEMS emissions data to demonstrate compliance with this condition as part of the Quarterly Operation Reports (AQ-SC8).	N	N/A	Quarterly	Quarterly Operation Reports	Ongoing	Amended in 2024
AQ	**42**		Y	Emissions of oxides of nitrogen (NOx), calculated as nitrogen dioxide (NO2), from each combustion turbine shall not exceed 90 pounds per hour measured over each **1**~~one~~-clock-hour period. In addition, the emission concentration of NOx, calculated as NO2, from each turbine shall not exceed 100 parts per million by volume on a dry basis (ppmvd) averaged over each **1**~~one~~-clock-hour period and corrected to 15**%** ~~percent~~ oxygen. These emission limits shall apply during all times a turbine is operating, including, but not limited to, emissions during ~~commissioning,~~**tuning operations, and** startup and shutdown periods for that turbine. [Rule 20.3(d)(2)]	The project owner shall provide CEMS emissions data to demonstrate compliance with this condition as part of the Quarterly Operation Reports (AQ-SC8).	N	N/A	Quarterly	Quarterly Operation Reports	Ongoing	Amended in 2024
AQ	**43**		Y	The carbon monoxide (CO) emissions from each combustion turbine shall not exceed 248 pounds per hour measured over each **1**~~one~~-clock-hour period. In addition, the emission concentration of CO from each turbine shall not exceed 400 parts per million by volume on a dry basis (ppmvd) averaged over each **1**~~one~~-clock-hour period and corrected to 15**%** ~~percent~~ oxygen. This emission limit shall apply during all times that a turbine is operating, including, but not limited to emissions during ~~commissioning,~~**tuning operations, and** startup and shutdown periods. [Rule 20.3(d)(2)(i)]	The project owner shall provide CEMS emissions data to demonstrate compliance with this condition as part of the Quarterly Operation Reports (AQ-SC8).	N	N/A	Quarterly	Quarterly Operation Reports	Ongoing	Amended in 2024

Technical Area	COC Number	Subtask	Deliverable Req.	Description	Verification/Action/Submittal Required	Required Prior to Start of Construction?	Action Days	Submittal Timing	Submittal Trigger Event	Compliance Status	Comments
AQ	**44**		Y	Total emissions from the equipment authorized to be constructed under this permit, except emissions or emission units excluded from the calculation of aggregate potential to emit as specified in Rule 20.1 (d)(1) as it exists on the date the permit to operate for this equipment is approved ~~and except for CO emissions during any rolling 12-calendar-month period in which a turbine commissioning period occurs~~, shall not exceed the following limits for each rolling 12-calendar-month period, beginning with the month in which the earliest initial startup among the equipment authorized to be constructed under this permit occurs: Pollutant Emission Limit, tons per year a. NOx 84.18 b. CO 77.8 c. VOC 24.1 d. PM10 28.4 e. SOx (calculated as SO2) 5.6 The aggregate emissions of each pollutant shall include emissions during all times that the equipment is operating~~, except for CO emissions during any rolling 12-calendar-month period in which a turbine commissioning period occurs.~~ All calculations performed to show compliance with this limit shall be performed according to a protocol approved in advance by the District. [**Rule 20.3(d)(1),** Rules~~~~ 20.3(d)(2), **Rule** 20.3(d)(5), ~~20.3(d)(8), and~~**Rule** 21]	The project owner shall submit to the CPM and the District the facility annual operating and emissions data demonstrating compliance with this condition as part of the fourth quarter's Quarterly Operation Reports (AQ-SC8).	N	N/A	Quarterly	Quarterly Operation Reports	Ongoing	Amended in 2024
AQ	**45**		Y	~~Total emissions of CO during any rolling 12-calendar-month period in which a turbine commissioning period occurs from the equipment authorized to be constructed under this permit except emissions or emission units excluded from the calculation of aggregate potential to emit as specified in Rule 20.1 (d)(1) as it exists on the date the permit to operate for this equipment is approved shall not exceed the following limit for each rolling 12-calendar-month period, beginning with the 12-calendar-month period that begins with the month in which the earliest initial startup among the equipment authorized to be constructed under this permit occurs:~~ ~~77.8 tons per year + N x 4.05 tons/yr~~ ~~Where N=number of turbines with commissioning periods occurring within the 12-calendar-month period. All calculations performed to show compliance with this limit shall be performed according to a protocol approved in advance by the District. [Rules 20.3(d)(2), 20.3(d)(5), 20.3(d)(8), and 21]~~**Cumulative mass emissions from all combustion turbines operated at this stationary source of oxides of nitrogen (NOx), calculated as NO2, and carbon monoxide (CO), shall not exceed the following limits during all tuning operations.** **Pollutant Emission Limit, lbs/hr Emission Limit, lbs/day** **a. NOx 49.3 591.6** **b. CO 135 1691**	The project owner shall submit to the CPM and District the ~~facility annual operating and~~**CEMS** emissions data demonstrating compliance with this condition as part of the ~~fourth quarter's~~ Quarterly Operation Reports (AQ-SC8).	N	N/A	4th Quarter	Quarterly Operation Reports	Ongoing	Amended in 2024
AQ	**46**		Y	Total emissions from each combustion turbine shall not exceed 14.3**2** tons per year of NOx calculated as nitrogen dioxide and shall not exceed 4.73 tons per year of PM10. For the purposes of this condition emissions shall be calculated on a rolling 12-calendar-month basis beginning with the calendar month in which the initial startup of the turbine occurs. All calculations performed to show compliance with this limit shall be performed according to a protocol approved in advance by the District. [**Rule 20.3(d)(1),** Rules~~~~ 20.3(d)(2), **Rule** 20.3(d)(5), ~~20.3(d)(8), and~~**Rule** 21]	The project owner shall provide emissions summary data in compliance with this condition as part of the Quarterly Operation Reports (AQ-SC8). The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	N	N/A	Quarterly	Quarterly Operation Reports	Ongoing	Amended in 2024

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~~AQ~~	~~47~~			~~Total emissions from the equipment permitted under APCD2003-PTO-001267, APCD2003-PTO-000791, APCD2003-PTO-000792, APCD2003-PTO-000793, APCD2003-PTO-001770 and APCD2003-PTO-005238 shall not exceed any of the following mass emission limits according to the schedule based on the number of turbines that have undergone their initial startup as described in the following table: Number of Turbines Started — NOx (ton/yr) — PM10 (ton/yr) 1 — No Limit — No Limit 2 — No Limit — No Limit 3 — 41.57 — No Limit 4 — 27.42 — 27.6 5 — 13.27 — 22.9 6 — 0.0 — 18.2 For the purposes of this condition, emissions shall be calculated on a rolling 12-calendar-month basis beginning with the calendar month in which 180 days has passed since the latest initial start from among the indicated number of turbines. Once a turbine has undergone its initial startup, it is included in determining the number of turbines started from the initial startup date going forward. All calculations performed to show compliance with this limit shall be performed according to a protocol approved in advance by the District. [Rules 20.3(d)(2), 20.3(d)(5), 20.3(d)(8), and 21]~~	~~This condition requires the existing Encina boilers and turbine to cease operations once the amended CECP is operational. The project owner shall provide emissions summary data in compliance with this condition as part of the Quarterly Operation Reports (AQ-SC8). The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.~~	~~N~~	~~N/A~~	~~Quarterly~~	~~Quarterly Operation Reports~~	Deleted	Deleted in 2024
AQ	**48**		Y	For each calendar month and each rolling 12-calendar-month period, the project owner shall maintain records, as applicable, on a calendar monthly basis, of mass emissions during each calendar month and rolling 12-calendar-month period of NOx (calculated as NO2), CO, VOCs (calculated as methane), PM10, and SOx (calculated as SO2), in tons, from each emission unit located at this stationary source, except for emissions or emission units excluded from the calculation of aggregate potential to emit as specified in Rule 20.1 (d)(1). These records shall be made available for inspection within 15 calendar days after the end of each calendar month. [**Rule 20.3(d)(1),** Rules 20.3(d)(3), ~~20.3(d)(8) and~~**Rule** 21]	The project owner shall provide emissions summary data in compliance with this condition as part of the Quarterly Operation Reports (AQ-SC8). The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	N	N/A	Quarterly	Quarterly Operation Reports	Ongoing	Amended in 2024
AQ	**49**			For each combustion turbine, the number of ~~annual~~ operating hours in each calendar year shall not exceed 2,700. For the purposes of this condition, the number of operating hours shall be calculated as the total number of unit operating minutes divided by 60 rounded to the nearest hundredth of an hour. [Rules 1200, 20.3(d)(2) and 21]	The project owner shall submit facility annual operating data demonstrating compliance with this condition as part of the fourth quarter's Quarterly Operation Reports (AQ-SC8).	N	N/A	Quarterly	Quarterly Operation Reports	Ongoing	Amended in 2024
AQ	**50**		Y	For each combustion turbine, the number of startup periods occurring in each calendar year shall not exceed 400. ~~When determining compliance with this limit, any startup that occurs during the commissioning period shall not be included.~~ [Rules 1200, 20.3(d)(2) and 21]	The project owner shall submit facility annual operating data demonstrating compliance with this condition as part of the fourth quarter's Quarterly Operation Reports (AQ-SC8).	N	N/A	4th Quarter	Quarterly Operation Reports	Ongoing	Amended in 2024
~~**AQ**~~	~~**51**~~		~~Y~~	~~For each combustion turbine, the number of startup periods occurring during its commissioning period shall not exceed 350. [Rules 1200, 20.3(d)(2) and 21]~~	~~The project owner shall submit facility annual operating data demonstrating compliance with this condition as part of the fourth quarter's Quarterly Operation Reports (AQ-SC8).~~	~~N~~	~~N/A~~	~~4th Quarter~~	~~Quarterly Operation Reports~~	Deleted	Deleted in 2024
~~**AQ**~~	~~52~~		~~Y~~	~~Not later than 90 calendar days prior to the start of construction, unless a later date is approved in writing by the District, the project owner shall submit to the District the final selection, design parameters and details of the selective catalytic reduction (SCR) and oxidation catalyst emission control systems for the combustion turbines including, but not limited to, the minimum temperature for the SCR at which ammonia injection is feasible; the catalyst volume, catalyst material, catalyst manufacturer, space velocity and area velocity at full load; and control efficiencies of the SCR for controlling NOx emissions and the oxidation catalyst CO and VOC emissions at temperatures between the minimum and maximum operating temperatures at space velocities corresponding to 100 percent and 25 percent load. Such information may be submitted to the District as trade secret and confidential pursuant to District Rules 175 and 176. [Rules 20.3(d)(1) and 14]~~	~~The project owner shall submit to the CPM for review and District for approval final selection, design parameters and details of the SCR and oxidation catalyst emission control systems at least 90 days prior to the start of construction.~~	~~Y~~	~~90~~	~~prior to~~	~~Construction~~	Deleted	Deleted in 2024
AQ	**53**		N	When a combustion turbine is operating, ammonia shall be injected at all times that the associated selective catalytic reduction (SCR) system outlet temperature is 540 degrees Fahrenheit or greater. [Rule 20.3 (d)(1)]	The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	N	as needed	N/A	Inspections	Ongoing	

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AQ	**54**		Y	~~Continuous monitors shall be installed on each SCR system prior to their initial operation to monitor or calculate, and record the ammonia solution injection rate in pounds per hour and the SCR outlet temperature in degrees Fahrenheit for each unit operating minute.~~ **The ammonia injection flow rate shall be continuously monitored, recorded, and controlled.** The monitors shall be installed, calibrated and maintained in accordance with a District approved protocol~~, which may be part of the CEMS protocol. This protocol, which shall include the calculation methodology, shall be submitted to the District for written approval at least 90 days prior to initial startup of the gas turbines with the SCR system, unless a later date is approved in writing by the District.~~. The monitors shall be in full operation at all times when the turbine is in operation. [Rule 20.3(d)(1)]	The project owner shall submit to the CPM for review and the District for approval a turbine operation monitoring protocol in compliance with this condition at least 90 days prior to the initial startup.	N	90	prior to	Initial Startup	N/A	Amended in 2024
AQ	**55**		N	Except during periods when the ammonia injection system is being tuned or one or more ammonia injection systems is in manual control for compliance with applicable permit conditions, the automatic ammonia injection system serving the SCR system shall be in operation in accordance with manufacturer's specifications at all times when ammonia is being injected into the SCR system. Manufacturer specifications shall be maintained on site and made available to District personnel upon request. [Rule 20.3(d)(1)]	The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	N	as needed	N/A	Inspections	Ongoing	
AQ	**56**	a	N	The concentration of ammonia solution used in the ammonia injection system shall be less than 20 percent ammonia by weight. Records of ammonia solution concentration shall be maintained on site and made available to District personnel upon request. [Rule 14, 21]	The project owner shall maintain on site and provide on request of the CPM or District the ammonia delivery records that demonstrate compliance with this condition.	N	as needed	N/A	Inspections	Ongoing	
AQ	**56**	b	Y		Testing witnessed by the District, a proposed test protocol shall be submitted to the District for written approval at least 60 days prior to source testing.	N	60	prior to	Source Test	Ongoing	
AQ	**56**	c	Y		Additionally, the District shall be notified a minimum of 30 days prior to the test so that observers may be present unless otherwise authorized in writing by the District. [Rules 20.3(d)(1) and 1200 and 40 CFR Part60 Subpart KKKK and 40 CFR.	N	30	prior to	Source Test	Ongoing	
AQ	**57**	a	Y	All source test or other tests required by this permit shall be performed by the District or an independent contractor approved by the District. Unless otherwise specified in this permit or authorized in writing by the District, if testing will be performed by an independent contractor and witnessed by the District, a proposed test protocol shall be submitted to the District for written approval at least 60 days prior to source testing. Additionally, the District shall be notified a minimum of 30 days prior to the test so that observers may be present unless otherwise authorized in writing by the District. [Rules 20.3(d)(1) and 1200 and 40 CFR Part60 Subpart KKKK and 40 CFR §60.8]	The project owner shall submit to the CPM for review and the District for approval the initial source test protocol at least 60 days prior to the initial source test.	N	60	prior to	Initial Source Test	Ongoing	
AQ	**57**	b	Y		The project owner shall notify the CPM and District no later than 30 days prior to the proposed source test date and time.	N	30	prior to	Source Test	Ongoing	
AQ	**58**		Y	Unless otherwise specified in this permit or authorized in writing by the District, within 45 days after completion of a source test or Relative Accuracy Test Audit (RATA) performed by an independent contractor, a final test report shall be submitted to the District for review and approval. [Rules 20.3(d)(1) and 1200 and 40 CFR Part 60 Subpart KKKK, 40 CFR §60.8, and 40 CFR Part 75]	The project owner will submit all RATA or source test reports to the CPM for review and the District for approval within 45 days of the completion of those tests.	N	45	after	completion of RATA/Source Tests	Ongoing	
AQ	**59**		Y	All testing conducted to measure concentrations or emissions of Volatile Organic Compounds (VOCs) shall include measurement of formaldehyde and the result shall be added to the result determined for other VOC concentrations or emissions, as applicable. Measurement of VOC emissions shall be conducted in accordance with EPA Method 18, or alternative methods approved by the District and EPA. Measurement of emissions of formaldehyde shall be conducted in accordance with EPA Method 316 or 323, or an alternative method approved by the District and EPA.	The project owner shall submit to the CPM for review and the District for approval the initial source test protocol and source test report within the timeframes specified in Conditions AQ-57 and AQ-58.	N	60	prior to	Initial Source Test		
~~**AQ**~~	~~**60**~~		~~Y~~	~~The exhaust stacks for each combustion turbine shall be equipped with source test ports and platforms to allow for the measurement and collection of stack gas samples consistent with all approved test protocols. The ports and platforms shall be constructed in accordance with District Method 3A, Figure 2, and approved by the District. Ninety days prior to construction of the turbine stacks the project owner shall provide to the District for written approval detailed plan drawings of the turbine stacks that show the sampling ports and demonstrate compliance with the requirements of this condition. [Rule 20]~~	~~The project owner shall submit to the CPM for review and District for approval a stack test port and platform plan at least 90 days before the construction of the turbine stacks.~~	~~N~~	~~90~~	~~prior to~~	~~Stack Installation~~	Deleted	Deleted in 2024

Technical Area	COC Number	Subtask	Deliverable Req.	Description	Verification/Action/Submittal Required	Required Prior to Start of Construction?	Action Days	Submittal Timing	Submittal Trigger Event	Compliance Status	Comments
AQ	**61**		Y	~~Not later than 60 calendar days after completion of the commissioning period for each combustion turbine, an Initial Emissions Source Test shall be conducted on that turbine~~ **Each combustion turbine shall be source tested** to demonstrate compliance with the NOX, CO, VOC, PM10, and ammonia emission standards of this permit. The source test protocol shall comply with all of the following requirements: a. Measurements of NOX and CO concentrations and emissions and oxygen (O2) concentration shall be conducted in accordance with U.S. Environmental Protection Agency (EPA) methods 7E, 10, and 3A, respectively, and District source test Method 100, or alternative methods approved by the District and EPA; b. Measurement of VOC concentrations and emissions, except for formaldehyde, shall be conducted in accordance with EPA Method 18, or an alternative method approved by the District and EPA; c. Measurement of formaldehyde concentrations and emissions shall be conducted in accordance with EPA Method 316 or 323, as specified by the District, or an alternative method approved by the District and EPA; d. Total VOC concentrations and emissions shall be the sum of those concentrations and emissions determined using Method 18 and the formaldehyde concentrations and emissions; e. Measurements of ammonia concentrations shall be conducted in accordance with Bay Area Air Quality Management District Method ST-1B or an alternative method approved by the District and EPA; f. Measurements of PM10 emissions shall be conducted in accordance with EPA Methods 201A and 202 or an alternative method approved by the district and EPA; g. Source testing shall be performed at the normal load level, as specified in 40 CFR Part 75 Appendix A Section 6.5.2.1 (d), provided it is not less than 80**%** ~~percent~~ of the combustion turbine's rated load unless it is demonstrated to the satisfaction of the District that the combustion turbine cannot operate under these conditions . If the demonstration is accepted, then emissions source testing shall be performed at the highest achievable continuous power level. The District may specify additional testing at different load levels or operational conditions to ensure compliance with the emission and concentration limits of this permit and District Rules and Regulations; h. Measurements of particulate matter emissions shall be conducted in accordance	The project owner shall submit to the CPM for review and the District for approval the initial source test protocol and source test report within the timeframes specified in Conditions AQ-57 and AQ-58.	N	60	prior to	Initial Source Test	Completed	Amended in 2024
AQ	**62**		Y	A renewal source test and a NOx and CO Relative Accuracy Test Audit (RATA) shall be periodically conducted on each combustion turbine to demonstrate compliance with the NOx, CO, VOC, PM10, and ammonia emission standards of this permit and applicable relative accuracy requirements for the CEMS systems using District approved methods. The renewal source test and the NOx and CO RATAs shall be conducted in accordance with the applicable RATA frequency requirements of 40 CFR75, Appendix B, Sections 2.3.1 and 2.3.3. The renewal source test shall be conducted in accordance with a protocol complying with all the applicable requirements of the source test protocol for the Initial Emissions Source Test. [Rule ~~69.3,~~ 69.3.1, and 20.3(d)(1) and 40 CFR Part 60 Subpart KKKK, and 40 CFR Part 75]	The project owner shall submit to the CPM for review and the District for approval the periodic RATA and source test protocols, and RATA source test reports within the timeframes specified in Conditions AQ-57 and AQ-58.	N	45	after	completion of RATA/Source Tests	Ongoing	Amended in 2024
AQ	**63**		Y	Relative Accuracy Test Audit**s** (RATAs) and all ~~other~~ required certification tests shall be performed and completed on the NOx CEMS in accordance with applicable provisions of 40 CFR Part 75 Appendix A and B and 40 CFR §60.4405 and on the CO CEMS in accordance with applicable provisions of 40 CFR Part 60 Appendix B and F. [~~Rule 21,~~ Rule 20.3 (d)(1), 40 CFR Part 60 Subpart KKKK**,** ~~and~~ 40 CFR Part 75] **In order to provide for a reasonable assurance of compliance with the permitted emissions limits, the CO CEMS must meet one of the following performance criteria: a. A Relative Accuracy of 10% when the average reference method value is used in the denominator of Equation 2-6 of 40 CFR 60, Performance Specification 2; b. A Relative Accuracy of 5.0% when the applicable emission standard is used in the denominator of Equation 2-6 of 40 CFR, Performance Specification 2; c. 0.50 ppmvd corrected to 15% oxygen and 1.0 lb/hr when the RA is calculated plus the 2.5% confidence coefficient.**	The results and field data collected during source tests required by this condition shall be submitted to the CPM for review and the District for approval as required by Condition AQ-58.	N	45	after	completion of RATA/Source Tests	Ongoing	Amended in 2024

Technical Area	COC Number	Subtask	Deliverable Req.	Description	Verification/Action/Submittal Required	Required Prior to Start of Construction?	Action Days	Submittal Timing	Submittal Trigger Event	Compliance Status	Comments
~~AQ~~	~~64~~		~~Y~~	~~Not later than 60 calendar days after completion of the commissioning period for each combustion turbine, an initial emission source test for toxic air contaminants shall be conducted on that turbine to determine the emissions of toxic air contaminants from the combustion turbines. At a minimum the following compounds shall be tested for, and emissions, if any, quantified:~~ ~~a. Acetaldehyde~~ ~~b. Acrolein~~ ~~c. Benzene~~ ~~d. Formaldehyde~~ ~~e. Toluene~~ ~~f. Xylenes~~ ~~This list of compounds may be adjusted by the District based on source test results to ensure compliance with District Rule 1200 and other conditions of this permit aredemonstrated. The District may require one or more or additional compounds to be quantified through source testing as needed to ensure compliance with Rule 1200 and other conditions of this permit. Within 60 calendar days after completion of a source test performed by an independent contractor, a final test report shall be submitted to the District for review and approval. [Rule 1200]~~	~~The results and field data collected during source tests required by this condition shall be submitted to the CPM for review and the District for approval within 60 days of testing.~~	~~N~~	~~60~~	~~after~~	~~Source Test~~	Deleted	Deleted in 2024
AQ	65		Y	The District may require one or more of the following compounds, or additional compounds to be quantified through source testing periodically to ensure compliance with Rule 1200 and other conditions of this permit and to quantify toxic emissions: a. Acetaldehyde b. Acrolein c. Benzene d. Formaldehyde e. Toluene f. Xylenes If the District requires the project owner to perform this source testing, the District shall request the testing in writing a reasonable period of time prior to the testing date. [Rule 1200 California H&S Code §41510]	The results and field data collected during source tests required by the District under this condition shall be submitted to the CPM for review and the District for approval within 60 days of testing.	N	60	after	Source Testing	Ongoing	
AQ	66		N	The higher heating value of the combustion turbine fuel shall be measured by ASTM D1826–94, Standard Test Method for Calorific Value of Gases in Natural Gas Range by Continuous Recording Calorimeter or ASTM D1945–96, Standard Method for Analysis of Natural Gas by Gas Chromatography or an alternative test method approved by the District and EPA. [Rules ~~69.3,~~ 69.3.1, and 20.3(d)(1) and 40 CFR Part 60 Subpart KKKK, and 40 CFR Part 75]	The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	N	as needed	N/A	Inspections	Ongoing	Amended in 2024
AQ	67		N	The sulfur content of the combustion turbine fuel shall be sampled not less than once each calendar quarter in accordance with a protocol approved by the District~~, which shall be submitted to the District for approval not later than 90 days before the earliest initial startup dates for any of the combustion turbines~~ and measured with ASTM D1072–90 (Reapproved 1994), Standard Test Method for Total Sulfur in Fuel Gases; ASTM D3246–05, Standard Test Method for Sulfur in Petroleum Gas by Oxidative Microcoulometry; ASTM D4468–85 (Reapproved 2000), Standard Test Method for Total Sulfur in Gaseous Fuels by Hydrogenolysis and Rateometric Colorimetry; ASTM D6228–98 (Reapproved 2003), Standard Test Method for Determination of Sulfur Compounds in Natural Gas and Gaseous Fuels by Gas Chromatography and Flame Photometric Detection; or ASTM D6667–04, Standard Test Method for Determination of Total Volatile Sulfur in Gaseous Hydrocarbons and Liquefied Petroleum Gases by Ultraviolet Fluorescence or an alternative test method approved by the District and EPA. [Rule 20.3 (d)(1), Rule 21, and 40 CFR Part 75]	The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	N	90	Quarterly	Quarterly Operation Reports	Ongoing	Amended in 2024
AQ	68		N	The project owner shall comply with the applicable continuous emission monitoring requirements of 40 CFR Part 75 and 40 CFR Part 60. [40 CFR Part 75 and 40 CFR Part 60]	The project owner shall maintain a copy of the CEMS protocol required by AQ-70 on site and provide it, other CEMS data, and the CEMS for inspection on request by representatives of the District, ARB, and the Energy Commission.	N	as needed	N/A	Inspections	Ongoing	

Technical Area	COC Number	Subtask	Deliverable Req.	Description	Verification/Action/Submittal Required	Required Prior to Start of Construction?	Action Days	Submittal Timing	Submittal Trigger Event	Compliance Status	Comments
AQ	**69**		Y	A continuous emission monitoring system (CEMS) shall be installed on each combustion turbine and properly maintained and calibrated to measure, calculate and record the following, in accordance with the District approved CEMS protocol: A. Clock-hourly average concentration of oxides of nitrogen (NOX) in parts per million (ppmvd) both uncorrected and corrected to 15**%** ~~percent~~ oxygen; B. Clock-hourly average concentration of carbon monoxide (CO) in parts per million (ppmvd) both uncorrected and corrected to 15**%** ~~percent~~ oxygen; C. Percent oxygen (O2) in the exhaust gas for each unit operating minute; D. Clock-hourly mass emissions of oxides of nitrogen (NOx) calculated as NO2, in pounds; E. Cumulative mass emissions of oxides of nitrogen (NOx) calculated as NO2 in each **tuning operation, and** startup and shutdown period, in pounds; F. Calendar-daily mass emissions of oxides of nitrogen (NOx) calculated as NO2, in pounds; G. Calendar monthly mass emissions of oxides of nitrogen (NOx) calculated as NO2, in pounds; H. Rolling four unit operating hour average concentration of oxides of nitrogen (NOx) in parts per million (ppmvd) corrected to 15**%** ~~percent~~ oxygen; I. Rolling four unit operating hour average emission rate of oxides of nitrogen (NOx), calculated as NO2, in pounds per megawatt-hour (lb/MWh). J. Calendar quarter, calendar year, and rolling 12-calendar-month period mass emissions of oxides of nitrogen (NOx) calculated as NO2, in tons; K. Cumulative mass emissions of carbon monoxide (CO) in each **tuning operation, and** startup and shutdown period, in pounds L. Clock-hourly mass emissions of carbon monoxide (CO), in pounds; M. Calendar-daily mass emission of carbon monoxide (CO), in pounds; N. Calendar-monthly mass emission of carbon monoxide (CO), in pounds; O. Rolling 12-calendar-month period mass emission of carbon monoxide (CO), in tons; P. Average concentration of oxides of nitrogen (NOx) and carbon monoxide (CO) in parts per million (ppmvd) both uncorrected and corrected to 15**%** ~~percent~~ oxygen during each unit operating minute; and	The project owner shall submit to the CPM for review and the District for approval a CEMS protocol, as required by AQ-70, which includes description of the methods of compliance with the requirements of this condition.	N	90	prior to	Initial Startup	Ongoing	Amended in 2024
AQ	**69**		N		The project owner shall make the site available for inspection of records and equipment by representatives of the District, ARB, and the Energy Commission.	N	as needed	N/A	Inspections	Ongoing	
AQ	**70**		Y	~~No later than 90 calendar days prior to initial startup of each combustion turbine, the project owner shall submit a CEMS protocol to the District, for written approval that shows how the CEMS will be able to meet all District monitoring requirements. [Rules 69.3, 69.3.1, and 20.3(d)(1) and 40 CFR Part 60 Subpart KKKK, and 40 CFR Part 75]~~**Copies of the approved CEMS protocol and the District's written approval shall be maintained on site and made available to District personnel upon request.**	The project owner shall submit to the CPM for review and the District for approval a CEMS operating protocol at least 90 days prior to the initial startup of each combustion turbine.	N	90	prior to	Initial Startup	Completed	Amended in 2024
~~**AQ**~~	~~**71**~~	~~a~~	~~Y~~	~~No later than the earlier of 90 unit operating days or 180 calendar days after each combustion turbine commences commercial operation, a Relative Accuracy Test Audit (RATA) and other required certification tests shall be performed and completed on that turbine's NOx CEMS in accordance with 40 CFR Part 75 Appendix A and on the CO CEMS in accordance with 40 CFR Part 60 Appendix B. The RATAs shall demonstrate that the NOx and CO CEMS comply with the applicable relative accuracy requirements. At least 60 calendar days prior to the test date, the project owner shall submit a test protocol to the District for written approval. Additionally, the District and U.S. EPA Region 9 shall be notified a minimum of 45 calendar days prior to the test so that observers may be present. Within 45 calendar days of completion of this test, a written test report shall be submitted to the District for approval. For purposes of this condition, commences commercial operation is defined as the first instance when power is sold to the electrical grid. [Rules 69.3, 69.3.1, and 20.3(d)(1) and 40 CFR Part 60 Subpart KKKK, and 40 CFR Part 75]~~	~~The project owner shall submit to the CPM for review and the District for approval the RATA certification test protocol at least 60 days prior to the RATA test and~~	~~N~~	~~60~~	~~prior to~~	~~RATA/Source Tests~~	Deleted	Deleted in 2024
~~**AQ**~~	~~**71**~~	~~c~~	~~Y~~		~~shall notify the CPM, the U.S. EPA Region 9, and District of the RATA test date at least 45 days prior to conducting the RATA and other certification tests.~~	~~N~~	~~45~~	~~prior to~~	~~RATA/Source Tests~~	Deleted	Deleted in 2024
~~**AQ**~~	~~**71**~~	~~d~~	~~Y~~		~~The project owner will submit all RATA or source test reports to the CPM for review and the District for approval within 45 days of the completion of those tests.~~	~~N~~	~~45~~	~~after~~	~~completion of RATA/Source Tests~~	Deleted	Deleted in 2024
AQ	**72**		Y	A monitoring plan in conformance with 40 CFR 75.53 shall be submitted to U.S. EPA Region 9 and the District at least 45 calendar days prior to the Relative Accuracy Test Audit (RATA), as required in 40 CFR 75.62. [40 CFR Part 75]	The project owner shall submit to the CPM for review and the District and the U.S. EPA Region 9 for approval a monitoring plan in compliance with this condition at least 45 days prior to the RATA test.	N	45	prior to	RATA/Source Tests	Ongoing	

Technical Area	COC Number	Subtask	Deliverable Req.	Description	Verification/Action/Submittal Required	Required Prior to Start of Construction?	Action Days	Submittal Timing	Submittal Trigger Event	Compliance Status	Comments
AQ	**73**		Y	The oxides of nitrogen (NOx) and oxygen (O2) components of the CEMS shall be certified and maintained in accordance with applicable **f**~~F~~ederal **r**~~R~~egulations including the requirements of ~~sections~~**§§** 75.10 and 75.12 of T~~t~~itle 40, Code of Federal Regulations Part 75 (40 CFR 75), the **P**~~p~~erformance **S**~~s~~pecifications of Appendix A of 40 CFR 75, the **q**~~Q~~uality **a**~~A~~ssurance procedures of Appendix B of 40 CFR 75 and the CEMS **P**~~p~~rotocol approved by the District. The carbon monoxide (CO) components of the CEMS shall be certified and maintained in accordance with **District 19,** 40 CFR 60, Appendices B and F~~, unless otherwise specified in this permit,~~ and the CEMS **P**~~p~~rotocol approved by the District. [Rules ~~69.3,~~ 69.3.1, ~~and~~ 20.3(d)(1)**;** ~~and~~ 40 CFR Part 60 Subpart KKKK~~,~~**; 40 CFR 60, Appendices B and F;** ~~and~~ 40 CFR Part 75]	The project owner shall submit to the CPM for review and the District for approval a CEMS protocol, as required by AQ-70, which includes description of the methods of compliance with the requirements of this condition.	N	90	prior to	Initial Startup	Ongoing	Amended in 2024
AQ	**73**		N		The project owner shall make the site available for inspection of records and equipment by representatives of the District, ARB, and the Energy Commission.	N	as needed	N/A	Inspections	Ongoing	
AQ	**74**		N	The CEMS shall be in operation in accordance with the District approved CEMs **P**~~p~~rotocol at all times when the turbine is in operation. A copy of the District approved CEMS ~~monitoring p~~**P**rotocol shall be maintained on site and made available to District personnel upon request. [Rules ~~69.3,~~ 69.3.1, and 20.3(d)(1)**;** ~~and~~ 40 CFR Part 60 Subpart KKKK~~,~~**;** and 40 CFR Part 75]	The project owner shall make the site available for inspection of records and equipment by representatives of the District, ARB, and the Energy Commission.	N	as needed	N/A	Inspections	Ongoing	Amended in 2024
AQ	**75**		Y		shall provide notation of when such calculations are used in place of operating CEMS data in the Quarterly Operation Reports (AQ-SC8).	N	N/A	Quarterly	Quarterly Operation Reports	Completed	
AQ	**76**		N	Any violation of any emission standard as indicated by the CEMS shall be reported to the District's ~~c~~**C**ompliance ~~d~~**D**ivision within 96 hours after such occurrence. [**CA Health and Safety Code, Division 26, Part 4, Chapter 5 §42706**~~Rule 19.2~~]	The project owner shall notify the District regarding any emission standard violation as required in this condition and	N	96 hours	after	Violation of Emission Standard	Ongoing	Amended in 2024
AQ	**76**		Y		shall document all such occurrences in each Quarterly Operation Report (AQ-SC8).	N	N/A	Quarterly	Quarterly Operation Reports	Ongoing	Amended in 2024
AQ	**77**		Y	The CEMS shall be maintained and operated, and reports submitted, in accordance with the requirements of rule 19.2 Sections (**D**~~d~~), (**E**~~e~~), (**F**~~f~~)(1), (**F**~~f~~)(2), (**F**~~f~~)(3), (**F**~~f~~)(4) and (**F**~~f~~)(5)~~,~~ and ~~a~~ CEMS ~~p~~**P**rotocol approved by the District. [Rule 19.2]	The project owner shall submit to the District the CEMS reports as required in this condition and shall make the site available for inspection of records and equipment by representatives of the District, ARB, and the Energy Commission.	N	as needed	N/A	Inspections	Ongoing	Amended in 2024
AQ	**78**		Y	Except for changes that are specified in the initial approved CEMS protocol or a subsequent revision to that protocol that is approved in advance, in writing by the District, the District shall be notified in writing at least **thirty (**30**)** calendar days prior to any planned changes made in the CEMS or Data Acquisition and Handling System (DAHS), including, but not limited to, the programmable logic controller, software which affects the value of data displayed on the CEMS/DAHS monitors with respect to the parameters measured by their respective sensing devices and any planned changes to the software that controls the ammonia flow to the SCR. Unplanned or emergency changes shall be reported within 96 hours. [Rules ~~69.3,~~ 69.3.1, and 20.3(d)(1) and 40 CFR Part 60 Subpart KKKK, and 40 CFR Part 75]	The project owner shall submit to the CPM for review and the District for approval any revision to the CEMS/DAHS or ammonia flow control software, as required by this condition, to be approved in advance at least 30 days before any planned changes are made.	N	30	prior to	Revisions to Monitoring Software	Ongoing	Amended in 2024
AQ	**78**		N		The project owner shall notify the District regarding any unplanned emergency changes to these software systems within 96 hours and	N	96 hours	after	Emergency Changes to Monitoring Software	Ongoing	Amended in 2024
AQ	**78**		Y		shall document all such occurrences in each Quarterly Operation Report (AQ-SC8).	N	N/A	Quarterly	Quarterly Operation Reports	Ongoing	Amended in 2024
~~**AQ**~~	~~**79**~~		~~Y~~	~~At least 90 calendar days prior to the Initial Emissions Source Test, the project owner shall submit a monitoring protocol to the District for written approval which shall specify a method of determining the VOC/CO surrogate relationship that shall be used to demonstrate compliance with all VOC emission limits when using CEMS data. This protocol can be provided as part of the Initial Source Emissions Testing Protocol. [Rule 20.3 (d)(1)]~~	~~The project owner shall submit to the CPM for review and the District for approval the monitoring protocol as part of the initial source test protocol in compliance with requirements of this condition at least 90 days prior to the initial source test.~~	~~N~~	~~90~~	~~prior to~~	~~Initial Source Test~~	Deleted	Deleted in 2024
AQ	**80**		Y	Fuel flowmeters shall be installed and maintained to measure the fuel flow rate, corrected for temperature and pressure, to each combustion turbine. Correction factors and constants shall be maintained on site and made available to the District upon request. The fuel flowmeters shall meet the applicable quality assurance requirements of 40 CFR Part 75, Appendix D, and Section 2.1.6. [Rule ~~69.3,~~ 69.3.1, and 20.3(d)(1) and 40 CFR Park 60 Subpart KKKK, and 40 CFR Part75]	The project owner shall submit to the CPM the natural gas usage data from the fuel flow meters as part of the Quarterly Operation Report (AQ-SC8).	N	N/A	Quarterly	Quarterly Operation Reports	Ongoing	Amended in 2024

Technical Area	COC Number	Subtask	Deliverable Req.	Description	Verification/Action/Submittal Required	Required Prior to Start of Construction?	Action Days	Submittal Timing	Submittal Trigger Event	Compliance Status	Comments
AQ	**81**		Y	Each combustion turbine shall be equipped with continuous monitors to measure, calculate and record unit operating days, hours, ~~and~~ minutes and the following operational characteristics: A. Date and time; B. Natural gas flow rate to the combustion turbine during each unit operating minute, in standard cubic feet per hour; C. Total heat input to the combustion turbine based the fuels higher heating value during each unit operating minute, in million British thermal units per hour (MMBtu/hr); D. Higher heating value of the fuel on an hourly basis, in million British thermal units per standard cubic foot (Btu/scf); E. Stack exhaust gas temperature during each unit operating minute, in degrees Fahrenheit; F. Gross electrical power output during each unit operating minute in megawatts (MW); and G. Water injection rate in gallons per minute (gpm) or pounds per hour (lb/hr). The values of these operational characteristics shall be recorded each unit operating minute. The monitors shall be installed, calibrated, and maintained in accordance with a turbine operation monitoring protocol, which may be part of the CEMS protocol, approved by the District, which shall include any relevant calculation methodologies. The monitors shall be in full operation at all times when the combustion turbine is in operation. Calibration records for the continuous monitors shall be maintained on site and made available to the District upon request. [Rules ~~69.3,~~ 69.3.1, and 20.3(d)(1) and 40 CFR Part 60 Subpart KKKK, and 40 CFR Part 75]	The project owner shall submit to the CPM for review and the District for approval a turbine operation monitoring protocol in compliance with this condition and within the timeframes specified in AQ-82 and the project owner shall make the site available for inspection of records and equipment required in this condition by representatives of the District, ARB, and the Energy Commission.	N	90	prior to	Initial Startup	Completed	Amended in 2024
~~**AQ**~~	~~**82**~~		~~Y~~	~~At least 90 calendar days prior to initial startup of each combustion turbine, the project owner shall submit a turbine monitoring protocol to the District for written approval. This may be part of the CEMS protocol. [Rule 69.3, 69.3.1, and 20.3 (d)(1) and 40 CFR Part 60 Subpart KKKK, and 40 CFR Part75]~~	~~The project owner shall submit to the CPM for review and the District for approval a turbine monitoring protocol in compliance with this condition at least 90 days prior to the initial startup of each combustion turbine.~~	~~N~~	~~90~~	~~prior to~~	~~Initial Startup~~	Deleted	Deleted in 2024
AQ	**83**		N	Operating logs or Data Acquisition and Handling System (DAHS) records shall be maintained to record the beginning and end times and durations of all **tuning periods, and** startup and shutdown periods to the nearest minute, quantity of fuel used in each clock minute, clock hour, calendar month, and 12-calendar-month period in standard cubic feet; hours of operation each day; and hours of operation during each calendar year. For purposes of this condition, the hours of turbine operation is defined as the total minutes the turbine is combusting fuel during the calendar year divided by 60 rounded to the nearest hundredth of an hour. [Rules 69.3, 69.3.1, and 20.3(d)(1) and 40 CFR Part 60 Subpart KKKK, and 40 CFR Part 75]	The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	N	as needed	N/A	Inspections	Ongoing	Amended in 2024
AQ	**84**		Y	~~Before the end of the commissioning period for each combustion turbine, the project owner shall install post-combustion air pollution control equipment on that turbine to minimize NOx and CO emissions. Once installed, t~~**T**he post-combustion air pollution control equipment shall be maintained in good condition and shall be in full operation at all times when the turbine is combusting fuel and the air pollution control equipment is at or above its minimum operating temperature. [Rule 20.3(d)(1)]	The project owner shall provide the CPM District records demonstrating compliance with this condition as part of the monthly commissioning status report (AQ-85).	N	N/A	Monthly	Monthly Commissioning Reports	Completed	Amended in 2024

Technical Area	COC Number	Subtask	Deliverable Req.	Description	Verification/Action/Submittal Required	Required Prior to Start of Construction?	Action Days	Submittal Timing	Submittal Trigger Event	Compliance Status	Comments
~~AQ~~	~~85~~		~~Y~~	~~Within 30 calendar days after the end of the commissioning period for each combustion turbine, the project owner shall submit a written report to the District. This report shall include, at a minimum, the date the commissioning period started and ended, the dates and times of all startup and shutdown periods, the emissions of NOx and CO during other periods, and the emissions of NOx and CO during steady state operation. This report shall also detail any turbine or emission control equipment malfunction, upset, repairs, maintenance, modifications, or replacements affecting emissions of air contaminants that occurred during the commissioning period. All of the following continuous monitoring information shall be reported for each minute and, except for cumulative mass emissions, averaged over each hour of operation:~~ ~~A. Concentration of oxides of nitrogen (NOx) in parts per million (ppmvd) uncorrected and corrected to 15 percent oxygen;~~ ~~B. Concentration of carbon monoxide (CO) in parts per million (ppmvd) uncorrected and corrected to 15 percent oxygen;~~ ~~C. Percent oxygen (O2) in the exhaust gas;~~ ~~D. Mass emissions of oxides of nitrogen (NOx) calculated as NO2 in each startup and shutdown period, in pounds;~~ ~~E. Cumulative mass emissions of oxides of nitrogen (NOx) calculated as NO2 in each startup and shutdown period, in pounds;~~ ~~F. Cumulative mass emissions of carbon monoxide (CO) in each startup and shutdown period, in pounds~~ ~~G. Mass emissions of carbon monoxide (CO), in pounds;~~ ~~H. Total heat input to the combustion turbine based on the fuel's higher heating value, in million British thermal units per hour (MMBtu/hr);~~ ~~I. Higher heating value of the fuel on an hourly basis, in million British thermal units per standard cubic foot (MMBtu/scf);~~ ~~J. Gross electrical power output of the turbine, in megawatts hours (MWh); and~~ ~~K. SCR outlet temperature, in degrees Fahrenheit;~~ ~~L. Water injection rate in gallons per minute (gpm) or pounds per hour (lb/hr), and~~ ~~M. Ammonia injection rate in pounds per hour (lb/hr).~~ ~~The hourly average information shall be submitted in writing and in an electronic format approved by the District. The minute-by-minute information shall be submitted~~	~~A log of the dates, times, and cumulative unit operating hours when fuel is being combusted during the commissioning period shall be maintained by the project owner. The project owner shall submit, commencing one month from the time of gas turbine first fire, a monthly commissioning status report throughout the duration of the commissioning phase that demonstrates compliance with the requirements listed in this condition. The monthly commissioning status report shall be submitted to the CPM by the tenth of each month for the previous month, for all months with turbine commissioning activities following the turbine first fire date. The project owner shall also~~ ~~provide the reporting required by this condition to the District and CPM within 30 day of completing commissioning of each turbine. The project owner shall make the site~~ ~~available for inspection of records by representatives of the District, ARB, and the Energy Commission.~~	~~N~~	~~10~~	~~following previous month~~	~~Monthly Commissioning Reports~~	Deleted	Deleted in 2024
~~AQ~~	~~85~~		~~Y~~		~~The project owner shall also provide the reporting required by this condition to the District and CPM within 30 day of completing commissioning of each turbine.~~	~~N~~	~~30~~	~~after~~	~~Each Turbine Commissioning~~	Deleted	Deleted in 2024
~~AQ~~	~~85~~		~~N~~		~~The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.~~	~~N~~	~~as needed~~	~~N/A~~	~~Inspections~~	Deleted	Deleted in 2024
~~AQ~~	~~86~~	~~a~~	~~Y~~	~~For each combustion turbine, the project owner shall submit the following notification to the District and U.S. EPA, Region 9:~~ ~~a. A notification in accordance with 40 CFR Section 60.7(a)(1) delivered or postmarked not late than 30 calendar days after construction has commenced;~~ ~~[Rules 24 and 21 and 40 CFR Part 75, 40 CFR Part 60 Subpart KKKK, 40 CFR Part §60.7, 40 CFR Part 63 Subpart YYYY, and 40 CFR Part §63.9]~~	~~The project owner shall provide notification to the District and U.S. EPA Region 9 as required by this condition and shall provide copies of these notifications as part of the final monthly commissioning status reports (AQ 85) due the month after the notifications are sent.~~	~~N~~	~~30~~	~~within~~	~~Start of construction~~	Deleted	Deleted in 2024
AQ	**87**		Y	The project owner shall file semiannual reports in accordance with 40 CFR §60.4375. [40 CFR ~~Part~~ 60 Subpart KKKK **§ 60.4375 (a)**]	None Required	N				Ongoing	Amended in 2024
AQ	**88**	a	Y	Each semiannual report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. Each such semiannual compliance report shall be postmarked or delivered no later than January 30 or July 30, whichever date is the first date following the end of the semiannual reporting period. [40 CFR ~~Part~~ 60 Subpart KKKK~~; and~~ Rule 21]	The project owner shall provide the District's Compliance Division the semi-annual reports required in this condition within the due dates specified in this condition,	N	N/A	Semi-Annual	Semi-Annual Report	Ongoing	Amended in 2024
AQ	**88**	b	Y		shall provide summaries of these semi-annual reports in the Quarterly Operation Reports (AQ-SC8) following each semi-annual report, and shall provide full copies of these reports to the CPM upon request.	N	N/A	Quarterly	Quarterly Operation Reports	Ongoing	Amended in 2024
AQ	**89**		N	All semiannual compliance reports shall be submitted to the District Compliance Division [40 CFR §60.7]	None required.	N				Ongoing	
~~AQ~~	~~90~~	~~a~~	~~Y~~	~~Within 120 days of startup of each gas turbine, the owner or operator shall submit an initial notification to US EPA Region 9 in accordance with 40 CFR 63.6145(c) with the information specified in 40 CFR 63.6145(d). [40 CFR 63 Subpart YYYY]~~	~~Submit notification to US EPA Region 9~~	~~N~~	~~120~~	~~within~~	~~Initial Startup~~	Deleted	Deleted in 2024
~~AQ~~	~~90~~	~~b~~	~~Y~~		~~The project owner shall provide a copy of the initial notification required by this condition to the CPM as part of the Quarterly Operation Reports (AQ-SC8).~~	~~N~~	~~N/A~~	~~Quarterly~~	~~Quarterly Operation Reports~~	Deleted	Deleted in 2024

Technical Area	COC Number	Subtask	Deliverable Req.	Description	Verification/Action/Submittal Required	Required Prior to Start of Construction?	Action Days	Submittal Timing	Submittal Trigger Event	Compliance Status	Comments
AQ	**90a**		**N**	**This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies**	**None required**	**N**				Ongoing	Added in 2024
	90b		**N**	**The project owner shall, upon determinization of applicability and written notification by the District, comply with all applicable requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.)**	**None required**	**N**				Ongoing	Added in 2024
AQ	**91**		Y	The exhaust stack for the emergency fire pump engine shall be a minimum of 20 feet in height above grade and a maximum of 0.5 feet in diameter at the point of release and shall not be equipped with a rain cap unless it is of flapper valve design. [Rules 1200, 20.3(d)(2)]	The project owner shall submit to the CPM for review the exhaust stack specification at least 60 days before the installation of the stack.	N	60	prior to	Stack Installation	Completed	
~~**AQ**~~	~~**92**~~		~~Y~~	~~The engine shall be EPA certified to the applicable requirements for emergency fire pump engines of 40 CFR Part 60 Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, based on the power rating of the engine and the engine model year. 40 CFR Part 60 Subpart IIII, and 40 CFR Part 63 Subpart ZZZZ, 17 CCR §93115]~~	~~The project owner shall provide to the CPM for review and approval engine documentation demonstrating compliance with the condition at least 30 days prior to purchasing the engine.~~	~~N~~	~~30~~	~~prior to~~	~~Purchase of Emergency Fire Pump Engines~~	Deleted	Deleted 2024
~~**AQ**~~	~~**93**~~		~~N~~	~~This EPA certified engine shall be installed, configured, operated and maintained according to the manufacturer's emission related instructions. The owner or operator may not change any emission related settings unless those changes are permitted by the manufacturer and do not affect the engine's compliance with the emission standards to which it is certified. [40 CFR 60 subpart IIII]~~	~~The project owner shall make the site available for inspection of equipment and records by representatives of the District, ARB, and the Energy Commission.~~	~~N~~	~~as needed~~	~~N/A~~	~~Inspections~~	Deleted	Deleted 2024
AQ	**94**		N	The engine shall be operated exclusively during emergencies as defined in Rule 69.4.1, ~~40 CFR Part 60 Subpart IIII~~ **or Rule 12** or 17 CCR §93115 as applicable, or for maintenance and testing.	The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	N	as needed	N/A	Inspections	Ongoing	Amended in 2024
AQ	**95**		Y	Engine operation for maintenance and testing purposes shall not exceed 35 hours per calendar year unless otherwise required by the National Fire Protection Association (NFPA) Section 25. [~~Rules 69.4.1, 40 CFR Part 60 Subpart IIII, and~~ 17 CCR §93115 **Rule 1200, NSR**]	The project owner shall submit to the CPM the fire pump engine operating data demonstrating compliance with this condition as part of the Quarterly Operation Report (AQ-SC8).	N	N/A	Quarterly	Quarterly Operation Reports	Ongoing	Amended in 2024
AQ	**96**		N	The engine shall only use CARB **d**~~D~~iesel **f**~~F~~uel. [**Rule 12,** Rule~~s~~ ~~20.3(d)(1),~~ 69.4.1, ~~and~~ 17 CCR §93115**, 40 CFR 60 Subpart IIII**]	The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	N	as needed	N/A	Inspections	Ongoing	Amended in 2024
AQ	**97**		N	Visible emissions including crankcase smoke shall comply with Air Pollution Control District Rule 50. [Rule 50]	The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	N	as needed	N/A	Inspections	Ongoing	
AQ	**98**		N	The equipment described above shall not cause or contribute to public nuisance. [Rule 51]	The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	N	as needed	N/A	Inspections	Ongoing	
AQ	**99**		N	This engine shall not operate for non-emergency use during the following periods, as applicable: A. Whenever there is any school sponsored activity, if engine is located on school grounds or B. Between 7:30 and 3:30 PM on days when school is in session, if the engine is located within 500 feet of, but not on school grounds. This condition shall not apply to an engine located at or near any school grounds that also serve as the student's place of residence. (ATCM reportable) [17 CCR §93115]	The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	N	as needed	N/A	Inspections	Ongoing	
AQ	**100**	a	Y	A non-resettable engine hour meter shall be installed on this engine, maintained in good working order, and used for recording engine ~~operating~~**operation** hours. If a meter is replaced, the Air Pollution Control District's Compliance Division shall be notified in writing within **10**~~ten~~ calendar days. The written notification shall include the following information: A. Old meter's hour reading. B. Replacement meter's manufacturer name, model, and serial number if available and current hour reading on replacement meter~~.~~**, and** C. Copy of receipt of new meter or of installation work order. A copy of the meter replacement notification shall be maintained on site and made available to the Air Pollution Control District upon request. [**Rule 12,** Rule~~s~~ 69.4.1, 17 CCR §93115, ~~and~~ 40 CFR ~~Part~~ 60 Subpart IIII**, 40 CFR 63 Subpart ZZZZ**]	The project owner shall provide notification to the District as required by this condition and	N	10	after	Meter Replacement	Ongoing	Amended in 2024
AQ	**100**	b	N		shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	N	as needed	N/A	Inspections	Ongoing	Amended in 2024

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AQ	**101**		N	The owner or operator **of this engine** shall conduct periodic maintenance of ~~this~~**the** engine and add-on control equipment, if any, as recommended by the engine and control equipment manufacturers or as specified by the engine servicing company's maintenance procedure**s**. ~~The periodic m~~**M**aintenance shall be conducted at least once each calendar year**, and shall include, but is not limited to, the following: 1) Change oil and filter, or test in accordance with the requirements of 40 CFR §63.6625(i) or (j); 2) inspect and clean air filters, replacing as necessary; and 3) Inspect all hoses and belts, replacing as necessary. Documentation of oil and filter changes or copies of the oil test analysis shall be kept on site and made available upon request. If testing in accordance with 40 CFR §63.6625(i) or (j), the oil analysis program must analyze the Total Base Number, viscosity and percent water content (for compression ignition engines) and the Total Acid Number, viscosity and percent water content (for spark ignited engines). If all of these condemning limits are not exceeded, the engine owner or oporator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analusis are received, the engine owner or operator must change the oil within two business days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.** [**Rule 12,** Rule 69.4.1**, 40 CFR 63 Subpart ZZZZ**~~and 40 CFR Part 60 Subpart IIII~~]	The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	N	as needed	N/A	Inspections	Ongoing	Amended in 2024
AQ	**102**		N	~~The owner or operator shall keep manuals of recommended maintenance as provided by the engine and control equipment manufacturers for at least the same period of time as the engine to which the records apply is located on site. [Rule 69.4.1 and 40 CFR Part 60 Subpart IIII]~~**The owner or operator of this engine shall install, configure, operate, and maintain this engine and control device, if any, according to the manuracturer's emission-related written instructions. The owner or operator may change only those emission-related settings that are permitted by the manufacturer. The periodic maintenance shall be conducted at least once each calendar year. [Rule 12, Rule 69.4.1, 40 CFR 60 Subpart IIII]**	The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	N	as needed	N/A	Inspections	Ongoing	Amended in 2024
AQ	**103**		N	The owner or operator of this engine shall maintain ~~records of all maintenance conducted on the engine, including a description of the maintenance and date the maintenance was performed~~**the following records on site for at least the same period of time as the engine to which the records apply is located at the site: (a) documentation shall be maintained identifying the fuel as CARB diesel, and (b) manual of recommended maintenance provided by the manufacturer.**. [Rule 69.4.1 ~~and~~ **15 CCR §93115,** 40 CFR Part 60 Subpart IIII]	The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	N	as needed	N/A	Inspections	Ongoing	Amended in 2024
AQ	**104**		N	~~The owner or operator shall maintain documentation for all fuel deliveries identifying the fuel as CARB diesel. [Rule 69.4.1, 17 CCR §93115, and 40 CFR Part 60 Subpart IIII]~~**All records required by this permit shall be maintained on site and readily available for District inspection for a minimum of 36 months from their date of creation unless otherwise indicated by the conditions of this permit. [Rule 12, Rule 69.4.1, 40 CFR 60 Subpart IIII]**	The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.	N	as needed	N/A	Inspections	Ongoing	Amended in 2024

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AQ	**105**		Y	The owner or operator of this engine equipment shall maintain a monthly operating log containing, at a minimum, the following: A. **d**~~D~~ates and **elpased** times of **every instance of** engine operation **based on actual readings of their engine hour meter;**~~,~~ whether the operation was for **maintenance and testing purposes,** compliance with the testing requirements of National Fire Protection Association (NFPA) **Section** 25 or emergency use**;**~~,~~ and the nature of the emergency~~, if known~~; B. **in located within 500 feet of a school, the time of day of every instance of engine operation for testing and maintenance, unless the engine emits no more than 0.01 g/bhp-hr of diesel particulate matter or meets the requirements specified in 17 CCR, Section 93115.13(f); c) total cumulative hours of operation per calendar year; d) records of annual engine maintenance shall include the data the maintenance was performed and the nature of the maintenance; and e) h**~~H~~ours of operation for all uses other than those specified above and identification of the nature of that use. [**Rule 12,** Rule 69.4.1, ~~40 CFR subpart IIII and~~ 17 CCR §93115**, 40 CFR 60 Subpart IIII, 40 CFR 63 Subpart ZZZZ**]	The project owner shall submit to the CPM the fire pump engine operating data demonstrating compliance with this condition as part of the Quarterly Operation Report (AQ-SC8).	N	N/A	Quarterly	Quarterly Operation Reports	Ongoing	Amended in 2024
~~**AQ**~~	~~**108**~~		~~N~~	~~This EPA certified engine shall be installed, configured, operated and maintained according to the manufacturer's emission related instructions. The owner or operator may not change any emission related settings unless those changes are permitted by the manufacturer and do not affect the engine's compliance with the emission standards to which it is certified. [40 CFR 60 subpart IIII]~~	~~The project owner shall make the site available for inspection of equipment and records by representatives of the District, ARB, and the Energy Commission.~~	~~N~~	~~as needed~~	~~N/A~~	~~Inspections~~	Deleted	Deleted in 2024
~~**AQ**~~	~~**109**~~		~~N~~	~~The engine shall be operated exclusively during emergencies as defined in Rule 69.4.1, 40 CFR Part 60 Subpart IIII or 17 CCR §93115 as applicable, or for maintenance and testing.~~	~~The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.~~	~~N~~	~~as needed~~	~~N/A~~	~~Inspections~~	Deleted	Deleted in 2024
~~**AQ**~~	~~**110**~~		~~Y~~	~~Engine operation for maintenance and testing purposes shall not exceed 50 hours per calendar year. [Rule 69.4.1, 40 CFR Part 60 Subpart IIII, 17 CCR §93115]~~	~~The project owner shall submit to the CPM the emergency generator engine operating data demonstrating compliance with this condition as part of the Quarterly Operation Report (AQ-SC8).~~	~~N~~	~~N/A~~	~~Quarterly~~	~~Quarterly Operation Reports~~	Deleted	Deleted in 2024
~~**AQ**~~	~~**111**~~		~~N~~	~~The engine shall only use CARB Diesel Fuel. [Rules 20.3(d)(1), 69.4.1, and 17 CCR §93115]~~	~~The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.~~	~~N~~	~~as needed~~	~~N/A~~	~~Inspections~~	Deleted	Deleted in 2024
~~**AQ**~~	~~**112**~~		~~N~~	~~Visible emissions including crankcase smoke shall comply with Air Pollution Control District Rule 50. [Rule 50]~~	~~The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.~~	~~N~~	~~as needed~~	~~N/A~~	~~Inspections~~	Deleted	Deleted in 2024
~~**AQ**~~	~~**113**~~		~~N~~	~~The equipment described above shall not cause or contribute to public nuisance. [Rule 51]~~	~~The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.~~	~~N~~	~~as needed~~	~~N/A~~	~~Inspections~~	Deleted	Deleted in 2024
~~**AQ**~~	~~**114**~~		~~N~~	~~This engine shall not operate for nonemergency use during the following periods, as applicable: a) Whenever there is any school sponsored activity, if engine is located on school grounds or b) Between 7:30 and 3:30 PM on days when school is in session, if the engine is located within 500 feet of, but not on school grounds. This condition shall not apply to an engine located at or near any school grounds that also serve as the student's place of residence. [17 CCR §93115]~~	~~The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.~~	~~N~~	~~as needed~~	~~N/A~~	~~Inspections~~	Deleted	Deleted in 2024
~~**AQ**~~	~~**115**~~	~~a~~	~~Y~~	~~A non-resettable engine hour meter shall be installed on this engine, maintained in good working order, and used for recording engine operating hours. If a meter is replaced, the Air Pollution Control District's Compliance Division shall be notified in writing within ten calendar days. The written notification shall include the following information: a) Old meter's hour reading. b) Replacement meter's manufacturer name, model, and serial number if available and current hour reading on replacement meter. c) Copy of receipt of new meter or of installation work order. A copy of the meter replacement notification shall be maintained on site and made available to the Air Pollution Control District upon request. [Rule 69.4.1, 17 CCR §93115, and 40 CFR Part 60 Subpart IIII]~~	~~The project owner shall provide notification to the District as required by this condition~~	~~N~~	~~10~~	~~within~~	~~Meter Replacement~~	Deleted	Deleted in 2024
~~**AQ**~~	~~**115**~~	~~b~~	~~N~~		~~and shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.~~	~~N~~	~~as needed~~	~~N/A~~	~~Inspections~~	Deleted	Deleted in 2024
~~**AQ**~~	~~**116**~~		~~N~~	~~The owner or operator shall conduct periodic maintenance of this engine and add-on control equipment, if any, as recommended by the engine and control equipment manufacturers or as specified by the engine servicing company's maintenance procedure. The periodic maintenance shall be conducted at least once each calendar year. [Rule 69.4.1 and 40 CFR Part 60 Subpart IIII]~~	~~The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.~~	~~N~~	~~as needed~~	~~N/A~~	~~Inspections~~	Deleted	Deleted in 2024

Technical Area	COC Number	Subtask	Deliverable Req.	Description	Verification/Action/Submittal Required	Required Prior to Start of Construction?	Action Days	Submittal Timing	Submittal Trigger Event	Compliance Status	Comments
~~AQ~~	~~117~~		~~N~~	~~The owner or operator shall keep manuals of recommended maintenance as provided by the engine and control equipment manufacturers for at least the same period of time as the engine to which the records apply is located on site. [Rule 69.4.1 and 40 CFR Part 60 Subpart IIII]~~	~~The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.~~	~~N~~	~~as needed~~	~~N/A~~	~~Inspections~~	Deleted	Deleted in 2024
~~AQ~~	~~118~~		~~N~~	~~The owner or operator of this engine shall maintain records of all maintenance conducted on the engine, including a description of the maintenance and date the maintenance was performed. [Rule 69.4.1 and 40 CFR Part 60 Subpart IIII]~~	~~The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.~~	~~N~~	~~as needed~~	~~N/A~~	~~Inspections~~	Deleted	Deleted in 2024
~~AQ~~	~~119~~		~~N~~	~~The owner or operator shall maintain documentation for all fuel deliveries identifying the fuel as CARB diesel. [Rule 69.4.1, 17 CCR §93115, and 40 CFR Part 60 Subpart IIII]~~	~~The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.~~	~~N~~	~~as needed~~	~~N/A~~	~~Inspections~~	Deleted	Deleted in 2024
~~AQ~~	~~120~~		~~Y~~	~~The owner or operator of this engine shall maintain a monthly operating log containing, at a minimum, the following: a) dates and times of engine operation; whether the operation was for maintenance and testing purposes or emergency use; and the nature of the emergency, if known; b) hours of operation for all uses other than those specified above and identification of the nature of that use. [Rule 69.4.1, 40 CFR 60 subpart IIII and 17 CCR §93115]~~	~~The project owner shall submit to the CPM the emergency generator engine operating data demonstrating compliance with this condition as part of the Quarterly Operation Report (AQ-SC8).~~	~~N~~	~~N/A~~	~~Quarterly~~	~~Quarterly Operation Reports~~	Deleted	Deleted in 2024
~~AQ~~	~~121~~	~~b~~	~~N~~		~~shall provide a copy of this notification to the CPM in the Quarterly Operation Report that follows the timing of the notification (AQ-SC8).~~	~~N~~	~~N/A~~	~~Quarterly~~	~~Quarterly Operation Reports~~	Deleted	Deleted in 2024
AQ-SC	1		Y	Air Quality Construction/Demolition Mitigation Manager (AQCMM): The project owner shall designate and retain an on-site AQCMM who shall be responsible for directing and documenting compliance with conditions AQ-SC3, AQ-SC4, and AQ-SC5 for the entire project site and linear facility construction/demolition. The on-site AQCMM may delegate responsibilities to one or more AQCMM Delegates. The AQCMM and AQCMM Delegates shall have full access to all areas of construction on the project site and linear facilities and shall have the authority to stop any or all construction/demolition activities as warranted by applicable construction/demolition mitigation conditions. The AQCMM and AQCMM Delegates may have other responsibilities in addition to those described in this condition. The AQCMM shall not be terminated without written consent of the Compliance Project Manager (CPM).	At least 60 days prior to the start of ground disturbance, the project owner shall submit to the CPM for approval, the name, resume, qualifications, and contact information for the on-site AQCMM and all AQCMM Delegates. The AQCMM and all Delegates must be approved by the CPM before the start of ground disturbance.	Y	60	prior to	ground disturbance	Completed	Approved by Start of Tank Demolition Letter from CPM, received on 12/9/14 for tanks 5, 6, and 7 Demolition. Approved by Start of tank demolition 1, 2, and 4, and soil remediation letter 8/31/15. Approved alternate AQ CMM on July 18, 2016.
AQ-SC	2		Y	Air Quality Construction/Demolition Mitigation Plan (AQCMP): The project owner shall provide an AQCMP, for approval, which details the steps that will be taken and the reporting requirements necessary to ensure compliance with conditions AQ-SC3, AQ-SC4, and AQ-SC5.	At least 60 days prior to the start of any ground disturbance, the project owner shall submit the AQCMP to the CPM for approval. The CPM will notify the project owner of any necessary modifications to the plan within 30 days from the date of receipt. The AQCMP must be approved by the CPM before the start of ground disturbance.	Y	60	prior to	ground disturbance	Completed	Approved by Start of Tank Demolition Letter from CPM, received on 12/9/14 for tanks 5, 6, and 7 Demolition. Approved by Start of tank demolition 1, 2, and 4, and soil remediation letter 8/31/15.

Technical Area	COC Number	Subtask	Deliverable Req.	Description	Verification/Action/Submittal Required	Required Prior to Start of Construction?	Action Days	Submittal Timing	Submittal Trigger Event	Compliance Status	Comments
AQ-SC	**3**	a	Y	Construction Fugitive Dust Control: The AQCMM shall submit documentation to the CPM in each Monthly Compliance Report (MCR) that demonstrates compliance with the following mitigation measures for the purposes of preventing all fugitive dust plumes from leaving the project site and linear facility routes. Any deviation from the following mitigation measures shall require prior CPM notification and approval. A. All unpaved roads and disturbed areas in the project and laydown construction/demolition sites shall be watered as frequently as necessary to comply with the dust mitigation objectives of AQ-SC4. The frequency of watering may be reduced or eliminated during periods of precipitation. B. No vehicle shall exceed 10 miles per hour on unpaved areas within the project and laydown construction/demolition sites. C. The construction/demolition site entrances shall be posted with visible speed limit signs. D. All construction/demolition equipment vehicle tires shall be inspected and washed as necessary to be cleaned and free of dirt prior to entering paved roadways. E. Gravel ramps of at least 20 feet in length must be provided at the tire washing/cleaning station. F. All unpaved exits from the construction/demolition site shall be graveled or treated to prevent track-out to public roadways. G. All construction/demolition vehicles shall enter the construction/demolition site through the treated entrance roadways, unless an alternative route has been submitted to and approved by the CPM. H. Construction/demolition areas adjacent to any paved roadway shall be provided with sandbags or other measures as specified in the Storm Water Pollution Prevention Plan (SWPPP) to prevent runoff to roadways. I. All paved roads within the construction/demolition site shall be swept at least twice daily (or less during periods of precipitation) on days when construction/demolition activity occurs to prevent the accumulation of dirt and debris. J. At least the first 500 feet of any public roadway exiting the construction/demolition site shall be swept visually clean, using wet sweepers or air filtered dry vacuum sweepers, at least twice daily (or less during periods of precipitation) on days when construction/demolition activity occurs or on any other day when dirt or runoff from the	The project owner shall include in the MCR: (1) a summary of all actions taken to maintain compliance with this condition, (2) copies of any complaints filed with the air district in relation to project construction/demolition, and (3) any other documentation deemed necessary by the CPM and AQCMM to verify compliance with this condition. Such information may be provided via electronic format or disk at the project owner's discretion.	N	N/A	Monthly	Monthly Compliance Report	Completed	
AQ-SC	**3**	b		K. All soil storage piles and disturbed areas that remain inactive for longer than 10 days shall be covered or shall be treated with appropriate dust suppressant compounds. L. All vehicles that are used to transport solid bulk material on public roadways and that have the potential to cause visible emissions shall be provided with a cover or the materials shall be sufficiently wetted and loaded onto the trucks in a manner to provide at least two feet of freeboard. M. Wind erosion control techniques (such as windbreaks, water, chemical dust suppressants, and/or vegetation) shall be used on all construction/demolition areas that may be disturbed. Any windbreaks installed to comply with this condition shall remain in place until the soil is stabilized or permanently covered with vegetation. N. Disturbed areas will be re-vegetated as soon as practical. O. Haul trucks used during the Encina Power Station demolition shall be limited to traveling on paved or graveled surfaces at all times within the boundary of the Encina Power Station property. The fugitive dust requirements listed in this condition may be replaced with as stringent or more stringent methods as required by SDAPCD Rule 55.						Completed	

Technical Area	COC Number	Subtask	Deliverable Req.	Description	Verification/Action/Submittal Required	Required Prior to Start of Construction?	Action Days	Submittal Timing	Submittal Trigger Event	Compliance Status	Comments
AQ-SC	**4**	a	N	Dust Plume Response Requirement: The AQCMM or Delegate shall monitor all construction/demolition activities for visible dust plumes. Observations of visible dust plumes that have the potential to be transported: (1) off the project site,-(2) 200 feet beyond the centerline of the construction of linear facilities, (3) within 100 feet upwind of any regularly occupied structures not owned by the project owner, or (4) within 50 feet upwind of the I-5 freeway indicate that existing mitigation measures are not resulting in effective mitigation. The AQCMM or Delegate shall implement the following procedures for additional mitigation measures in the event that such visible dust plumes, other than those occurring upwind of the I-5 Freeway, are observed: Step 1: The AQCMM or Delegate shall direct more intensive application of the existing mitigation methods within 15 minutes of making such a determination. Step 2: The AQCMM or Delegate shall direct implementation of additional methods of dust suppression if Step 1 specified above fails to result in adequate mitigation within 30 minutes of the original determination. Step 3: The AQCMM or Delegate shall direct a temporary shutdown of the activity causing the emissions if Step 2 specified above fails to result in effective mitigation within one hour of the original determination. The activity shall not restart until the AQCMM or Delegate is satisfied that appropriate additional mitigation or other site conditions have changed so that visual dust plumes will not result upon restarting the shut-down source. The owner/operator may appeal to the CPM any directive from the AQCMM or Delegate to shut down an activity, provided that the shutdown shall go into effect within one hour of the original determination, unless overruled by the CPM before that time.	The AQCMP shall include a section detailing how the additional mitigation measures will be accomplished within the time limits or directions specified.	Y	N/A	N/A	ground disturbance	Completed	
AQ-SC	**4**	b		The AQCMM or Delegate shall implement the following procedures for additional mitigation measures in the event that such visible dust plumes occurring within 50 feet upwind of the I-5 Freeway are observed: Step 1: The AQCMM or Delegate shall immediately cease the activities causing the visible dust plumes if any obscuration of visibility is occurring to drivers on the I-5 freeway. The AQCMM or Delegate shall direct more intensive application of the existing mitigation methods immediately if the visible plumes are seen within 50 feet of the I-5 freeway but are not causing obscuration of visibility to drivers. Step 2: The AQCMM or Delegate shall direct implementation of additional methods of dust suppression and monitor the start-up and/or continuation of the dust causing activities to ensure that the additional mitigation is effective. Step 3: The AQCMM or Delegate shall direct a temporary shutdown of the activity causing the emissions if Step 2 specified above fails to result in effective mitigation. The activity shall not restart until the AQCMM or Delegate is satisfied that appropriate additional mitigation or other site conditions have changed so that visual dust plumes that could impact visibility on the I-5 Freeway will not occur upon restarting the shut-down fugitive dust source.						Completed	

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AQ-SC	**5**	a	Y	Diesel-Fueled Engine Control: The AQCMM shall submit to the CPM, in the Monthly Compliance Report, a construction/demolition mitigation report that demonstrates compliance with the AQCMP mitigation measures for purposes of controlling diesel construction/demolition-related emissions. The following off-road diesel construction/demolition equipment mitigation measures shall be included in the Air Quality Construction Mitigation Plan (AQCMP) required by AQ-SC2, and any deviation from the AQCMP mitigation measures shall require prior CPM notification and approval. a) All diesel-fueled engines used in the construction/demolition of the facility shall have clearly visible tags issued by the on-site AQCMM showing that the engine meets the conditions set forth herein. b) All construction/demolition diesel engines with a rating of 50 hp or higher shall meet, at a minimum, the Tier 4 or 4i California Emission Standards for Off-Road Compression-Ignition Engines, as specified in California Code of Regulations, Title 13, section 2423(b)(1), unless a good faith effort to the satisfaction of the CPM that is certified by the on-site AQCMM demonstrates that such engine is not available for a particular item of equipment. In the event that a Tier 4 or 4i engine is not available for any off-road equipment larger than 50 hp, that equipment shall be equipped with a Tier 3 engine, or an engine that is equipped with retrofit controls to reduce exhaust emissions of nitrogen oxides (NOx) and diesel particulate matter (DPM) to no more than Tier 3 levels unless certified by engine manufacturers or the on-site AQCMM that the use of such devices is not practical for specific engine types. For purposes of this condition, the use of such devices is “not practical” for the following, as well as other, reasons. 1. There is no available retrofit control device that has been verified by either the California Air Resources Board or U.S. Environmental Protection Agency to control the engine in question to Tier 3 equivalent emission levels and the highest level of available control using retrofit or Tier 2 engines is being used for the engine in question; or 2. The construction/demolition equipment is intended to be on site for ten working days or less. 3. The CPM may grant relief from this requirement if the AQCMM can demonstrate a	The AQMM shall include in a table in the Monthly Compliance Report the following to demonstrate control of diesel construction/demolition-related emissions: A. A summary of all actions taken to control diesel construction/demolition-related emissions; B. A list of all heavy equipment used on site during that month, including the owner of that equipment and a letter from each owner indicating that equipment had been properly maintained; and C. Any other documentation deemed necessary by the CPM, and the AQCMM to verify compliance with this condition. Such information may be provided via electronic format or disk at the project owner's discretion.	N	N/A	Monthly	Monthly Compliance Report	Completed	
AQ-SC	**5**	b		c) The use of a retrofit control device may be terminated immediately, provided that the CPM is informed within ten working days of the termination and that a replacement for the equipment item in question meeting the controls required in item “b” occurs within ten days of termination of the use, if the equipment would be needed to continue working at this site for more than 15 days after the use of the retrofit control device is terminated, if one of the following conditions exists: 1. The use of the retrofit control device is excessively reducing the normal availability of the construction/demolition equipment due to increased down time for maintenance, and/or reduced power output due to an excessive increase in back pressure. 2. The retrofit control device is causing or is reasonably expected to cause engine damage. 3. The retrofit control device is causing or is reasonably expected to cause a substantial risk to workers or the public. 4. Any other seriously detrimental cause which has the approval of the CPM prior to implementation of the termination. d) All heavy earth-moving equipment and heavy duty construction/demolition-related trucks with engines meeting the requirements of (b) above shall be properly maintained and the engines tuned to the engine manufacturer’s specifications. e) All diesel heavy construction/demolition equipment shall not idle for more than five minutes. Vehicles that need to idle as part of their normal operation (such as concrete trucks) are exempted from this requirement. f) Construction/demolition equipment will employ electric motors when feasible.					Completed	
AQ-SC	**6**	a	Y/N	The project owner shall submit to the CPM for review and approval any project air permit modification proposed by the project owner. The project owner shall submit to the CPM any modification to any permit proposed by the District or U.S. EPA, and any revised permit issued by the District or U.S. EPA, for the project.	The project owner shall submit any proposed air permit modification to the CPM within five working days of its submittal either by: 1) the project owner to an agency, or 2) receipt of proposed modifications from an agency.	N	5	prior to	Air Permit Modification	Ongoing	
AQ-SC	**6**	b	Y		The project owner shall submit all modified air permits to the CPM within 15 days of receipt.	N	15	after	Air Permit Modification	Ongoing	

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AQ-SC	**8**		Y	The project owner shall submit to the CPM Quarterly Operation Reports, following the end of each calendar quarter that include operational and emissions information as necessary to demonstrate compliance with the conditions of certification herein. The Quarterly Operation Report will specifically state that the facility meets all applicable conditions of certification or note or highlight all incidences of noncompliance.	The project owner shall submit the Quarterly Operation Reports to the CPM and District, if requested by the District, no later than 30 days following the end of each calendar quarter.	N	30	following end of quarter	Quarterly Operation Reports	Ongoing	
~~**AQ-SC**~~	~~**9**~~			~~The gas turbines shall only be operated between the military time hours of 0600 to 2400, except in the event of a California Independent System Operator declared emergency.~~	~~The project owner shall submit the Quarterly Operation Reports to the CPM and District, if requested by the District, no later than 30 days following the end of each calendar quarter that demonstrate the operating hours and provide documentation regarding declared emergency events when the gas turbines are operated between the hours of 2400 and 0600, military time.~~	~~N~~	~~30~~	~~following end of quarter~~	~~Quarterly Operation Reports~~	Deleted	Deleted in 2024
AQ-SC	**10**		N	[Deleted]	N/A	N				N/A	Deleted
AQ-SC	**11**		Y	The project owner shall develop and implement a Leak Detection and Repair (LDAR) plan for the onsite natural gas compressors.	The project owner shall provide the LDAR plan to the CPM for review and approval at least 60 days prior to the start of installation of the natural gas compressors. The LDAR plan shall follow the general practices outlined in the U.S. EPA's "Leak Detection and Repair -- A Best Practices Guide" document. If requested the project owner shall provide records of the implementation of the LDAR plan.	N	60	prior to	Natural Gas Compressors Installation	Completed	
~~**AQ-SC**~~	~~**12**~~		~~Y~~	~~The project owner shall not allow the overlap of specific construction and demolition phase activities. The following activities shall not be conducted concurrently with any of the other listed activities:~~ ~~1. ASTs 5, 6, and 7 demolition (licensed CECP activity)~~ ~~2. ASTs 1, 2, and 4 demolition and berm removal (PTR described activities).~~ ~~3. Amended CECP construction (PTA described activities).~~ ~~4. EPS demolition (PTA and Encina Power Station Demolition Plan described activities).~~ ~~In addition, the gas turbines initial commissioning activity and the EPS demolition activity shall not be performed concurrently.~~	~~The project owner shall identify the start and conclusion of the work phases described above in the Monthly Compliance Reports.~~	~~N~~	~~N/A~~	~~Monthly~~	~~Monthly Compliance Report~~	Deleted	Deleted in 2024
~~**AQ-SC**~~	~~**13**~~		~~Y~~	~~The project owner shall not implode or fell any concrete or mortar structure, such as the main exhaust stack or the power plant building, during the demolition of the Encina Power Station.~~	~~The project owner shall provide updates on the demolition progress and the demolition methods used in the Monthly Compliance Reports.~~	~~N~~	~~N/A~~	~~Monthly~~	~~Monthly Compliance Report~~	Deleted	Deleted in 2024
BIO	**1**	b	Y		If a Designated Biologist needs to be replaced, the specified information of the proposed replacement must be submitted to the CPM at least ten working days prior to the termination or release of the preceding designated biologist. In an emergency, the project owner shall immediately notify the CPM to discuss the qualifications and approval of a short-term replacement while a permanent Designated Biologist is proposed to the CPM for consideration.	N	10	prior to	Termination of DB, CRS, PRS	Ongoing	
BIO	1	a	Y	The project owner shall assign a Designated Biologist to the project. The project	The project owner shall submit the specified information at least 90 days	Y	90	prior to	Site Mobilization	Completed	Approved by Start of Tank Demolition
BIO	**2**	a	Y	The project owner shall ensure that the Designated Biologist performs the following during any site (or related facilities) mobilization, ground disturbance, grading,	The Designated Biologist shall submit in the monthly compliance report to the CPM copies of all written reports and summaries that document	N	N/A	Monthly	Monthly Compliance Report	Completed	
BIO	**2**	b		5. inspect active construction areas where animals may have become trapped prior to construction commencing each day. At the end of the day, inspect for the installation of structures that prevent entrapment or allow escape during periods of construction inactivity. Periodically inspect areas with high vehicle activity (i.e., parking lots) for animals in harm's way; 6. notify the project owner and the CPM of any non-compliance with any **Biological Resources** Condition of Certification; 7. respond directly to inquiries of the CPM regarding biological resource issues; 8. maintain written records of the tasks specified above and those included in the BRMIMP. Summaries of these records shall be submitted in the monthly compliance report and the annual report; and 9. train the biological monitors as appropriate, and ensure their familiarity with the BRMIMP, Worker Environmental Awareness Program (WEAP) training, and all permits.	During project operation, the Designated Biologist shall submit record summaries in the annual compliance report unless his/her duties are ceased as approved by the CPM.	N	N/A	Annual	Annual Compliance Report	Ongoing	
BIO	**5**	d	N		The signed training acknowledgement forms from construction shall be kept on file by the project owner for a period of at least 6 months after the start of commercial operation. During project operation, signed statements for active project operational personnel shall be kept on file for 6 months following the termination of an individual's employment.	N	6 months	after	Commercial Operation	Ongoing	

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BIO	**5**	e	N		During project operation, signed statements for active project operational personnel shall be kept on file for six months following the termination of an individual's employment.	N	>180	N/A	Termination of Individual's Employment	Ongoing	
BIO	**6**	b	Y		If there are any permits that have not yet been received when the BRMIMP is first submitted, these permits shall be submitted to the CPM, the CDFW, and USFWS within five days of their receipt, and	N	5	after	Receipt of permits for BRMIMP	Ongoing	
BIO	**6**	c	Y		the BRMIMP shall be revised or supplemented to reflect the permit condition within ten days of their receipt by the project owner.	N	10	after	Receipt of permits for BRMIMP	Ongoing	
BIO	**6**	e	Y		The project owner shall notify the CPM no less than five working days before implementing any modifications to the approved BRMIMP to obtain CPM approval. Any changes to the approved BRMIMP must also be approved by the CPM in consultation with CDFW, the USFWS, and appropriate agencies to ensure no conflicts exist.	N	5	prior to	Modifications to BRMIMP	Ongoing	
BIO	**6**	f	Y	9. all locations on a map, at an approved scale, of sensitive biological resource areas subject to disturbance and areas requiring temporary protection and avoidance during construction; 10. aerial photographs, at an approved scale, of all areas to be disturbed during project construction activities — one set prior to any site (and related facilities) mobilization disturbance and one set subsequent to completion of project construction. Include planned timing of aerial photography and a description of why times were chosen; 11. duration for each type of monitoring and a description of monitoring methodologies and frequency; 12. performance standards to be used to help decide if/when proposed mitigation is or is not successful; 13. all performance standards and remedial measures to be implemented if performance standards are not met; 14. a preliminary discussion of biological resources related facility closure measures; 15. restoration and revegetation plan; and 16. a process for proposing plan modifications to the CPM and appropriate agencies for review and approval.	Implementation of BRMIMP measures will be reported in the monthly compliance reports by the Designated Biologist (i.e., survey results, construction activities that were monitored, species observed).	N	N/A	Annual	Annual Compliance Report	Ongoing	
COMPLIANCE	**1**		N	**Unrestricted Access.** The project owner shall take all steps necessary to ensure that the CPM, responsible Energy Commission staff, and delegated agencies or consultants have unrestricted access to the facility site, related facilities, project-related staff, and the records maintained to facilitate audits, surveys, inspections, and general or closure-related site visits. Although the CPM shall normally schedule site visits on dates and times agreeable to the project owner, the CPM reserves the right to make unannounced visits at any time, whether such visits are by the CPM in person or through representatives from Energy Commission staff, delegated agencies, or consultants.		N	as needed	N/A	Inspections	Ongoing	
COMPLIANCE	**2**		N	**Compliance Record.** The project owner shall maintain electronic copies of all project files and submittals on-site, or at an alternative site approved by the CPM, for the operational life and closure of the project. The files shall also contain at least one hard copy of: 1. the facility's Application(s) for Certification; 2. all amendment petitions and Energy Commission orders; 3. all site-related environmental impact and survey documentation; 4. all appraisals, assessments, and studies for the project; 5. all finalized original and amended structural plans and "as-built" drawings for the entire project; 6. all citations, warnings, violations, or corrective actions applicable to the project; and 7. the most current versions of any plans, manuals and training documentation required by the conditions of certification or applicable LORS. Energy Commission staff and delegate agencies shall, upon request to the project owner, be given unrestricted access to the files maintained pursuant to this condition.		N	as needed	N/A	Inspections	Ongoing	

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COMPLIANCE	**3**		Y	**Compliance Verification Submittals.** Verification lead times associated with the start of construction or closure may require the project owner to file submittals during the AFC process, particularly if construction is planned to commence shortly after certification. The verification procedures, unlike the conditions, may be modified as necessary by the CPM. A cover letter from the project owner or an authorized agent is required for all compliance submittals and correspondence pertaining to compliance matters. The cover letter subject line shall identify the project by AFC number, cite the appropriate condition of certification number(s), and give a brief description of the subject of the submittal. When submitting supplementary or corrected information, the project owner shall reference the date of the previous submittal and the condition(s) of certification applicable. All reports and plans required by the project's conditions of certification shall be submitted in a searchable electronic format (.pdf, MS Word, or Excel, etc.) and include standard formatting elements such as a table of contents, identifying by title and page number each section, table, graphic, exhibit, or addendum. All report and/or plan graphics and maps shall be adequately scaled and shall include a key with descriptive labels, directional headings, a bar scale, and the most recent revision date. The project owner is responsible for the content and delivery of all verification submittals to the CPM, whether the actions required by the verification were satisfied by the project owner or an agent of the project owner. All submittals shall be accompanied by an electronic copy on an electronic storage medium, or by e-mail, as agreed upon by the CPM. If hard-copy submittals are required, please address as follows: Compliance Project Manager Carlsbad Energy Center Project (07-AFC-6C) California Energy Commission 1516 Ninth Street (MS-2000) Sacramento, CA 95814		N	N/A	N/A	General compliance	Ongoing	
COMPLIANCE	**5**		Y	**Compliance Matrix**. The project owner shall submit a compliance matrix to the CPM with each MCR and ACR. The compliance matrix provides the CPM with the status of all conditions of certification in a spreadsheet format. The compliance matrix shall identify: 1. the technical area (e.g., biological resources, facility design, etc.); 2. the condition number; 3. a brief description of the verification action or submittal required by the condition; 4. the date the submittal is required (e.g., sixty (60) days prior to construction, after final inspection, etc.); 5. the expected or actual submittal date; 6. the date a submittal or action was approved by the CBO, CPM, or delegate agency, if applicable; 7. the compliance status of each condition (e.g., "not started," "in progress," or "completed" (include the date); and 8. if the condition was amended, the updated language and the date the amendment was proposed or approved. The CPM can provide a template for the compliance matrix upon request.	A compliance matrix shall be submitted by the project owner to the CPM along with each monthly and annual compliance report.	Y	N/A	Annual	Annual Compliance Report	Ongoing	

Technical Area	COC Number	Subtask	Deliverable Req.	Description	Verification/Action/Submittal Required	Required Prior to Start of Construction?	Action Days	Submittal Timing	Submittal Trigger Event	Compliance Status	Comments
COMPLIANCE	**7**	a	Y	**Annual Compliance Reports.** After construction is complete, the project owner must submit searchable electronic ACRs instead of MCRs. ACRs are due for each year of commercial operation and may be required for a specified period after decommissioning to monitor closure compliance, as specified by the CPM. The searchable electronic copies may be filed on an electronic storage medium or by e-mail, subject to CPM approval. Each ACR must include the AFC number, identify the reporting period, and contain the following: 1. an updated compliance matrix showing the status of all conditions of certification (fully satisfied conditions do not need to be included in the matrix after they have been reported as completed); 2. a summary of the current project operating status and an explanation of any significant changes to facility operations during the year; 3. documents required by specific conditions to be submitted along with the ACR; each of these items shall be identified in the transmittal letter with the condition it satisfies and submitted as an attachment to the ACR; 4. a cumulative list of all post-certification changes approved by the Energy Commission or the CPM; 5. an explanation for any submittal deadlines that were missed, accompanied by an estimate of when the information will be provided; 6. a list of filings submitted to, and permits issued by, other governmental agencies during the year; 7. a projection of project compliance activities scheduled during the next year; 8. a list of the year's additions to the on-site compliance file; 9. an evaluation of the Site Contingency Plan, including amendments and plan updates; and 10. a list of complaints, notices of violation, official warnings, and citations received during the year, a description of how the issues were resolved, and the status of any unresolved matters.	ACRs are due for each year of commercial operation and may be required for a specified period after decommissioning to monitor closure compliance, as specified by the CPM.	N	N/A	Annual	Annual Compliance Report	Ongoing	
COMPLIANCE	**7**	b	Y		Include an updated Provisional Closure Plan and Cost Estimate in every fifth-year ACR for CPM review and approval.	N	N/A	Every 5 Years	Annual Compliance Report		
COMPLIANCE	**8**		Y	**Confidential Information.** Any information that the project owner designates as confidential shall be submitted to the Energy Commission's Executive Director with an application for confidentiality, pursuant to Title 20, California Code of Regulations, section 2505 (a). Any information deemed confidential pursuant to the regulations shall remain undisclosed, as provided in Title 20,		N	N/A	N/A	General compliance	Ongoing	
COMPLIANCE	**9**		Y	**Annual Energy Facility Compliance Fee.** Pursuant to the provisions of section 25806 (b) of the Public Resources Code, the project owner is required to pay an annually adjusted compliance fee. Current compliance fee information is available on the Energy Commission's website at http://www.energy.ca.gov/siting/filing_fees.html. The project owner may also contact the CPM for the current fee information. The initial payment is due on the date the Energy Commission dockets its final Decision. All subsequent payments are due by July 1 of each year in which the facility retains its certification.	The initial payment is due on the date the Energy Commission dockets its final Decision. All subsequent payments are due by July 1 of each year in which the facility retains its certification.	N	N/A	N/A	General compliance	Ongoing	
COMPLIANCE	**10**		Y	**Amendments, Staff-Approved Project Modifications, Ownership Changes, and Verification Changes.** The project owner shall petition the Energy Commission, pursuant to Title 20, California Code of Regulations, section 1769, to modify the design, operation, or performance requirements of the project or linear facilities, or to transfer ownership or operational control of the facility. The CPM will determine whether staff approval will be sufficient, or whether Commission approval will be necessary. It is the project owner's responsibility to contact the CPM to determine if a proposed project change triggers the requirements of section 1769. Section 1769 details the required contents for a Petition to Amend an Energy Commission Decision. The only change that can be requested by means of a letter to the CPM is a request to change the verification method of a condition of certification. Implementation of a project modification without first securing Energy Commission, or Energy Commission staff, approval may result in an enforcement action, including civil penalties, in accordance with section 25534 of the Public Resources Code. If the Energy Commission's rules regarding amendments are revised, the rules in effect at the time the change is requested shall apply.		Y	N/A	Prior to	Project Change on Design	Ongoing	Approved by Start of Tank Demolition Letter from CPM, received on 12-9-14 for tanks 5, 6, and 7 Demolition. Approved by Start of tank demolition 1, 2, and 4, and soil remedation letter 8-31-15.
COMPLIANCE	**11**	b	Y		The project owner shall respond to all complaints within 24 hours or the next business day.	N	1	after	Complaint	Ongoing	

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COMPLIANCE	**11**	c	Y		In addition to including all complaints, notices, and citations with the MCRs and ACRs, within ten days of receipt, the project owner shall report, and provide copies to the CPM, of all complaints, including noise and lighting complaints, notices of violation, notices of fines, official warnings, and citations.	N	N/A	Monthly	Monthly Compliance Report	Ongoing	
COMPLIANCE	**11**	d	Y		In addition to including all complaints, notices, and citations with the MCRs and ACRs, within ten days of receipt, the project owner shall report, and provide copies to the CPM, of all complaints, including noise and lighting complaints, notices of violation, notices of fines, official warnings, and citations.	N	N/A	Annual	Annual Compliance Report	Ongoing	
COMPLIANCE	**11**	e	Y		In addition to including all complaints, notices, and citations with the MCRs and ACRs, within ten days of receipt, the project owner shall report, and provide copies to the CPM, of all complaints, including noise and lighting complaints, notices of violation, notices of fines, official warnings, and citations.	N	10	after	Complaint	Ongoing	
COMPLIANCE	**12**		Y	**Emergency Response Site Contingency Plan**. No less than 60 days prior to the start of commercial operation (or other date agreed to by the CPM), the project owner shall submit for CPM review and approval, an Emergency Response Site Contingency Plan (Contingency Plan). The Contingency Plan shall evidence a facility's coordinated emergency response and recovery preparedness for a series of reasonably foreseeable emergency events. The CPM may require the updating of the Contingency Plan over the life of the facility. Contingency Plan elements include, but are not limited to: 1. a site-specific list and direct contact information for persons, agencies, and responders to be notified for an unanticipated event; 2. a detailed and labeled facility map, including all fences and gates, the windsock location (if applicable), the on- and off-site assembly areas, and the main roads and highways near the site; 3. a detailed and labeled map of population centers, sensitive receptors, and the nearest emergency response facilities; 4. a description of the on-site, first response and backup emergency alert and communication systems, site-specific emergency response protocols, and procedures for maintaining the facility's contingency response capabilities, including a detailed map of interior and exterior evacuation routes, and the planned location(s) of all permanent safety equipment; 5. an organizational chart including the name, contact information, and first aid/emergency response certification(s) and renewal date(s) for all personnel regularly on-site; 6. a brief description of reasonably foreseeable, site-specific incidents and accident sequences (on- and off-site), including response procedures and protocols and site security measures to maintain twenty-four-hour site security; 7. procedures for maintaining contingency response capabilities; and 8. the procedures and implementation sequence for the safe and secure shutdown of all non-critical equipment and removal of hazardous materials and waste (see also specific conditions of certification for the technical areas of Public Health, Waste Management, Hazardous Materials Management, and Worker Safety).	No less than 60 days prior to the start of commercial operation (or other date agreed to by the CPM), the project owner shall submit for CPM review and approval, an Emergency Response Site Contingency Plan (Contingency Plan).	N	60	prior to	Commercial Operation	Ongoing	
COMPLIANCE	**13**	a		**Incident-Reporting Requirements.** Within one hour after it is safe and feasible, the project owner shall notify the CPM or compliance office manager, by telephone and e-mail, of any incident at the power plant or appurtenant facilities that results, or could result, in any of the following: 1. health and safety impacts on the surrounding population; 2. property damage off-site; 3. response by off-site emergency response agencies; 4. serious on-site injury; 5. serious environmental damage; or 6. emergency reporting to any federal, state, or local agency. The notice shall describe the circumstances, status, and expected duration of the incident. If warranted, as soon as it is safe and feasible, the project owner shall implement the safe shutdown of any non-critical equipment and removal of any hazardous materials and waste that pose a threat to public health and safety and to environmental quality (also, see specific conditions of certification for the technical areas of HAZARDOUS MATERIALS MANAGEMENT and WASTE MANAGEMENT).	Within one hour after it is safe and feasible, the project owner shall notify the CPM or compliance office manager, by telephone and e-mail, of any incident at the power plant or appurtenant facilities	N	1 hour	after	Incident	Ongoing	

Technical Area	COC Number	Subtask	Deliverable Req.	Description	Verification/Action/Submittal Required	Required Prior to Start of Construction?	Action Days	Submittal Timing	Submittal Trigger Event	Compliance Status	Comments
COMPLIANCE	**13**	b		Within one week of the incident, the project owner shall submit to the CPM a detailed incident report, which includes, as appropriate, the following information: 1. a brief description of the incident, including its date, time, and location; 2. a description of the cause of the incident, or likely causes if it is still under investigation; 3. the location of any off-site impacts; 4. description of any resultant impacts; 5. a description of emergency response actions associated with the incident; 6. identification of responding agencies; 7. identification of emergency notifications made to federal, state, and/or local agencies; 8. identification of any hazardous materials released and an estimate of the quantity released; 9. a description of any injuries, fatalities, or property damage that occurred as a result of the incident; 10. fines or violations assessed or being processed by other agencies; 11. name, phone number, and e-mail address of the appropriate facility contact person having knowledge of the event; and 12. corrective actions to prevent a recurrence of the incident. The project owner shall maintain all incident report records for the life of the project, including closure. After the submittal of the initial report for any incident, the project owner shall submit to the CPM copies of incident reports within 24 hours of a request.	Within one week of the incident, the project owner shall submit to the CPM a detailed incident report.	N	5	after	Incident	Ongoing	
COMPLIANCE	**14**	a	Y	**Non-operation**. If the facility ceases operation temporarily, either planned or unplanned, for longer than one week, but less than three months (or other CPM-approved date), the project owner shall notify the CPM (by telephoneand e-mail), interested agencies, and nearby property owners. Notice of planned non-operation shall be given at least two weeks prior to the scheduled date. Notice of unplanned non-operation shall be provided no later than one week after non-operation begins. For any non-operation, a Repair/Restoration Plan for conducting the activities necessary to restore the facility to availability and reliable and/or improved performance shall be submitted to the CPM within one week after notice of non-operation is given. If non-operation is due to an unplanned incident, temporary repairs and/or corrective actions may be undertaken before the Repair/Restoration Plan is submitted. The Repair/Restoration Plan shall include: 1. identification of operational and non-operational components of the plant; 2. a detailed description of the repair or restoration activities; 3. a proposed schedule for completing the repair or restoration activities; 4. an assessment of whether or not the proposed activities would require changing, adding, and/or deleting any conditions of certification, and/or would cause noncompliance with any applicable LORS; and 5. planned activities during non-operation, including any measures toensure continued compliance with all conditions of certification and LORS.	Notify the CPM (by telephone and e-mail), interested agencies, and nearby property owners of planned non-operation at least two weeks prior to the scheduled date.	N	10	prior to	Planned Non-Operation	Ongoing	
COMPLIANCE	**14**	b	Y		Notify the CPM (by telephone and e-mail), interested agencies, and nearby property owners of unplanned non-operation shall be provided no later than one week after non-operation begins.	N	5	prior to	Unplanned Non-Operation	Ongoing	
COMPLIANCE	**14**	c	Y		For any non-operation, a Repair/Restoration Plan for conducting the activities necessary to restore the facility to availability and reliable and/or improved performance shall be submitted to the CPM within one week after notice of non-operation is given.	N	5	after	Notice of Non-Operation	Ongoing	

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COMPLIANCE	**14**	d	Y	The CPM will determine if CBO oversight or compliance site monitoring is required. Written updates to the CPM for non-operational periods, until operation resumes, shall include: 1. progress relative to the schedule; 2. developments that delayed or advanced progress or that may delay or advance future progress; 3. any public, agency, or media comments or complaints; and 4. projected date for the resumption of operation. During non-operation, all applicable conditions of certification and reporting requirements remain in effect. If, after one year from the date of the project owner's last report of productive Repair/Restoration Plan work, the facility does not resume operation or does not provide a plan to resume operation, the Executive Director may assign suspended status to the facility and recommend commencement of permanent closure activities. Within 90 days of the Executive Director's determination, the project owner shall do one of the following: 1. If the facility has a closure plan, the project owner shall update it and submit it for Energy Commission review and approval. 2. If the facility does not have a closure plan, the project owner shall develop one consistent with the requirements in this Compliance Plan and submit it for Energy Commission review and approval.	Within 90 days of the Executive Director's determination, the project owner shall do one of the following: 1. If the facility has a closure plan, the project owner shall update it and submit it for Energy Commission review and approval. 2. If the facility does not have a closure plan, the project owner shall develop one consistent with the requirements in this Compliance Plan and submit it for Energy Commission review and approval.	N	90	after	Permanent Closure	Ongoing	
COMPLIANCE	**15**	a	Y	**Facility Closure Planning.** To ensure that a facility's eventual permanent closure and long-term maintenance do not pose a threat to public health and safety and/or to environmental quality, the project owner shall coordinate with the Energy Commission to plan and prepare for eventual permanent closure. A. Provisional Closure Plan and Estimate of Permanent Closure Costs To assure satisfactory long-term site maintenance and adequate closure for "the whole of a project," the project owner shall submit a Provisional Closure Plan and Cost Estimate for CPM review and approval within 60 days after the start of commercial operation. The Provisional Closure Plan and Cost Estimate shall consider applicable final closure plan requirements, and reflect the use of an independent third party to carry out the permanent closure. The Provisional Closure Plan and Cost Estimate shall provide for a phased closure process and include but not be limited to: 1. comprehensive scope of work and itemized budget; 2. closure plan development costs; 3. dismantling and demolition; 4. recycling and site clean-up; 5. mitigation and monitoring direct, indirect, and cumulative impacts; 6. site remediation and/or restoration; 7. interim and long term operation monitoring and maintenance, including long-term equipment replacement costs; and 8. contingencies. The project owner shall include an updated Provisional Closure Plan and Cost Estimate in every fifth-year ACR for CPM review and approval. Each updated Provisional Closure Plan and Cost Estimate shall reflect the most current regulatory standards, best management practices, and applicable LORS.	Submit a Provisional Closure Plan and Cost Estimate for CPM review and approval within 60 days after the start of commercial operation.	N	60	after	Commercial Operation	Ongoing	

Technical Area	COC Number	Subtask	Deliverable Req.	Description	Verification/Action/Submittal Required	Required Prior to Start of Construction?	Action Days	Submittal Timing	Submittal Trigger Event	Compliance Status	Comments
COMPLIANCE	**15**	b		B. Final Closure Plan and Cost Estimate At least three years prior to initiating a permanent facility closure, the project owner shall submit for Energy Commission review and approval, a Final Closure Plan and Cost Estimate, which includes any long-term, post-closure site maintenance and monitoring. Final Closure Plan and Cost Estimate contents include, but are not limited to: 1. a statement of specific Final Closure Plan objectives; 2. a statement of qualifications and resumes of the technical experts proposed to conduct the closure activities, with detailed descriptions of previous power plant closure experience; 3. identification of any facility-related installations not part of the Energy Commission certification, designation of who is responsible for these, and an explanation of what will be done with them after closure; 4. a comprehensive scope of work and itemized budget for permanent plant closure and site maintenance activities, with a description and explanation of methods to be used, broken down by phases, including, but not limited to: a) dismantling and demolition; b) recycling and site clean-up; c) impact mitigation and monitoring; d) site remediation and/or restoration and; e) any contingencies. 5. a revised/updated Final Cost Estimate for all closure activities, by phases, including site monitoring and maintenance costs, and long-term equipment replacement;	At least three years prior to initiating a permanent facility closure, the project owner shall submit for Energy Commission review and approval, a Final Closure Plan and Cost Estimate, which includes any long-term, post-closure site maintenance and monitoring.	N	3 Years	prior to	Permanent Closure	Ongoing	
COMPLIANCE	**15**	c		6. a schedule projecting all phases of closure activities for the power plant site and all appurtenances constructed as part of the Energy Commissioncertified project; 7. an electronic submittal package of all relevant plans, drawings, risk assessments, and maintenance schedules and/or reports, including an above- and below-ground infrastructure inventory map and registered engineer's or delegate CBO's assessment of demolishing the facility; additionally, for any facility that permanently ceased operation prior to submitting a Final Closure Plan and Cost Estimate and for which only minimal or no maintenance has been done since, a comprehensive condition report focused on identifying potential hazards; 8. all information additionally required by the facility's conditions of certification applicable to plant closure; 9. an equipment disposition plan, including: a) recycling and disposal methods for equipment and materials; and b) identification and justification for any equipment and materials that will remain on-site after closure; 10. a site disposition plan, including but not limited to: a) proposed rehabilitation, restoration, and/or remediation procedures, as required by the conditions of certification and applicable LORS; and b) site maintenance activities. 11. identification and assessment of all potential direct, indirect, and cumulative impacts and proposal of mitigation measures to reduce significant adverse impacts to a less-than-significant level; potential impacts to be considered shall include, but not be limited to: a) traffic b) noise and vibration c) soil erosion d) air quality degradation e) solid waste f) hazardous materials g) waste water discharges h) contaminated soil		N				Ongoing	

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COMPLIANCE	**15**	d		12. identification of all current conditions of certification, LORS, federal, state, regional, and local planning efforts applicable to the facility, and proposed strategies for achieving and maintaining compliance during closure; 13. updated mailing list or listserv of all responsible agencies, potentially interested parties, and property owners within one mile of the facility; 14. identification of alternatives to plant closure and assessment of the feasibility and environmental impacts of these; and 15. description of and schedule for security measures and safe shutdown of all non-critical equipment and removal of hazardous materials and waste (see conditions of certification for Public Health, Waste Management, Hazardous Materials Management, and Worker Safety). If implementation of an Energy Commission-approved Final Closure Plan and Cost Estimate is not initiated within one year of its approval date, it shall be updated and re-submitted to the Commission for supplementary review and approval. If a project owner initiates but then suspends closure activities, and the suspension continues for longer than one year, or subsequently abandons the facility, the Final Closure Plan and Cost Estimate shall be resubmitted to the Commission for supplementary review and approval. The project owner remains liable for all costs of contingency planning and closure.					Ongoing	
GEN	**1**	c	N		At least 30 days prior to the demolition of the EPS, the project owner shall contact the CBO to obtain the CBO's approval of the work.	N	30	prior to	Demolition of the EPS	Demolition Started	
HAZ	**1**	b	Y		and in the Annual Compliance Report.	N	N/A	Annual	Annual Compliance Report	Ongoing	
HAZ	**8**	c	Y		In the annual compliance report, the project owner shall include a statement that all current project employee and appropriate contractor background investigations have been performed, and that updated certification statements have been appended to the operations security plan. In the annual compliance report, the project owner shall include a statement that the operations security plan includes all current hazardous materials transport vendor certifications for security plans and employee background investigations.	N	N/A	Annual	Annual Compliance Report	Ongoing	
SOIL&WATER	**4**	b	Y		The project owner shall submit to the CPM the annual water quality monitoring report required by the SDRWQCB in the annual compliance report. The project owner shall notify the CPM of all WDR Order violations, the actions taken or planned to bring the project back into compliance with the WDR Order, and the date compliance was reestablished.	N	N/A	Annual	Annual Compliance Report	Ongoing	
SOIL&WATER	**5**	b	Y		The project owner shall submit to the CPM any water quality monitoring reports required by the City in the annual compliance report. The project owner shall notify the CPM of any violations of the permit(s) and conditions, the actions taken or planned to bring the project back into compliance with the permit(s), and the date compliance was reestablished.	N	N/A	Annual	Annual Compliance Report	Ongoing	
SOIL&WATER	**6**	b	Y		The project owner shall provide a report on the servicing, testing, and calibration of the metering devices in the annual compliance report. The project owner shall submit a water use summary report to the CPM in the annual compliance report for the life of the project. The annual summary report shall be based on and distinguish recorded daily use and emergency uses of potable and recycled water. The report shall include calculated monthly range, monthly average, and annual use by the project in both gallons per minute and acre-feet. After the first year and for subsequent years, this information shall also include the yearly range and yearly average potable and recycled water used by the project.	N	N/A	Annual	Annual Compliance Report	Ongoing	
SOIL&WATER	**6**	c			The project owner shall submit a petition to amend within 3 months of exceeding the maximum allowable 300 acre-feet of potable water for operational uses.	N	90	after	Exceeding Maximum Allowable 300 acre-Feet of Potable Water for Operational Uses	Ongoing	
SOIL&WATER	**7**	b	Y		During operations, the project owner shall submit to the CPM any wastewater quality monitoring reports required by the City in the annual compliance report.	N	N/A	Annual	Annual Compliance Report	Ongoing	

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SOIL&WATER	**7**	c	Y		The project owner shall submit any notices of violation from the City to the CPM within ten days of receipt and fully explain the corrective actions taken in the annual compliance report.	N	10	after	NOV	Ongoing	
SOIL&WATER	**9**	a	Y	Prior to transport and disposal of any facility construction or demolition-related wastewaters offsite, the project owner shall test and classify the stored wastewater to determine proper management and disposal requirements. The project owner shall provide evidence that wastewater is disposed of at an appropriately licensed facility. The project owner shall ensure that the wastewater is transported and disposed of in accordance with the wastewater's characteristics and classification and all applicable LORS (including any CCR Title 22 Hazardous Waste and Title 23 Waste Discharges to Land requirements). Where discharge of wastewater must comply with the San Diego Regional Water Quality Control Board (SDRWQCB) and State Water Resources Control Board regulatory requirements, the project owner shall submit a Report of Waste Discharge (ROWD) to the compliance project manager (CPM) and SDRWQCB for determination of which regulatory waiver or permit applies to the proposed discharges. The project owner shall pay all necessary fees for filing and review of the ROWD and all other related fees. Checks for such fees shall be submitted to the SDRWQCB and shall be payable to the State Water Resources Control Board. The project owner shall ensure compliance with the provisions of the waiver or permit applicable to the discharge. Where the regulatory requirements are not applied pursuant to a National Pollutant Discharge Elimination System permit, it is the Commission's intent that the requirements of the applicable waiver or permit be enforceable by both the Commission and the SDRWQCB. In furtherance of that objective, the Commission hereby delegates the enforcement of the waiver or permit requirements, and associated monitoring, inspection, and annual fee collection authority, to the SDRWQCB. The CPM and SDRWQCB shall confer with each other and coordinate, as needed, in the enforcement of the requirements.	The project owner shall submit to the CPM copies of all relevant correspondence between the project owner and the SWRCB or SDRWQCB about the EPS demolition wastewater discharge requirements within ten days of its receipt or submittal. This information shall include copies of the Notice of Intent and Notice of Termination for the project. A letter from the SWRCB or SDRWQCB indicating that there is no requirement for the discharge of EPS demolition wastewater would satisfy this condition.	N	10	after	receipt or submittal of correspondence between project owner and SWRCB or SDRWQCB about the EPS demolition wastewater discharge requirements	Ongoing	
TLSN	**3**			The project owner shall ensure that the rights-of-way of the proposed transmission lines are kept free of combustible material, as required under the provisions of section 4292 of the Public Resources Code and section 1250 of Title 14 of the California Code of Regulations.	During the first five years of plant operation, the project owner shall provide a summary of inspection results and any fire prevention activities carried out along the right-of-way of each line and provide such summaries in the Annual Compliance Report.	N	N/A	Annual	During the first five years of plant operation	Ongoing	
VIS	**1**	c	Y		The project owner shall provide a status report regarding surface treatment maintenance in the Annual Compliance Report. The report shall specify: a) the condition of the surfaces of all structures and buildings at the end of the reporting year; b) maintenance activities that occurred during the reporting year; and c) the schedule of maintenance activities for the next year.	N	N/A	Annual	Annual Compliance Report	Ongoing	
VIS	**2**	b	N		3. The planting must occur during the first optimal planting season following site mobilization. The project owner shall simultaneously notify the CPM and the City of Carlsbad within seven days after completing installation of the landscaping, that the landscaping is ready for inspection.	N	7	after	Landscaping	Ongoing	
VIS	**2**	c	Y		4. The project owner shall report landscape maintenance activities, including replacement of dead or dying vegetation, for the previous year of operation in each Annual Compliance Report. The City of Carlsbad, with the concurrence of the CPM, shall have authority to require replacement planting of dead or dying vegetation through the life of the project	N	N/A	Annual	Annual Compliance Report	Ongoing	

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VIS	**3**	B		If necessary to provide visual screening of staging activities, equipment and materials in the short term, the project owner shall provide temporary dark-colored, opaque fencing to provide visual screening until landscape screening described above has achieved sufficient maturity to provide visual screening. Existing opaque fencing shall be maintained along the Carlsbad Boulevard frontage of the EPS for the duration of construction and demolition. The project owner shall submit to the CPM for review and approval, and simultaneously to the city of Carlsbad for review and comment, a landscaping plan whose proper implementation will satisfy these requirements. The plan shall include: a) A detailed landscape, grading, and irrigation plan, at a reasonable scale. The plan shall demonstrate how the requirements stated above shall be met. The plan shall provide a detailed installation schedule demonstrating installation of as much of the landscaping as early in the construction process as is feasible in coordination with project construction. The intent of the plan shall be to minimize loss of existing perimeter tree and shrub screening, particularly at the northeast laydown site; and to provide supplemental and replacement plantings as needed to screen staging sites.		N			As Needed	Ongoing	
VIS	**3**	b	N	b) A list (prepared by a qualified professional arborist familiar with local growing conditions) of proposed species, specifying installation sizes, growth rates, expected time to maturity, expected size at five years and at maturity, spacing, number, availability, and a discussion of the suitability of the plants for the site conditions and mitigation objectives, with the objective of providing the widest possible range of species from which to choose; c) Maintenance procedures, including any needed irrigation and a plan for routine annual or semi-annual debris removal for the life of the project; d) A procedure for monitoring for and replacement of unsuccessful plantings for the life of the project; and e) One set of 11”x17” color photo-simulations of the proposed landscaping landscape condition at start of construction and at five years and twenty years after planting, as viewed from Key Observation Point 1 6 (location shown on Visual Resources Figure 3 of the Staff Assessment). The plan shall not be implemented until the project owner receives final approval from the CPM.	3. The planting must occur during the first optimal planting season following site mobilization. The project owner shall simultaneously notify the CPM and the City of Carlsbad within seven days after completing installation of the landscaping, that the landscaping is ready for inspection.	N	7	after	Landscaping	Ongoing	
VIS	**3**	c	Y		4. The project owner shall report landscape maintenance activities, including replacement of dead or dying vegetation, for the previous year of operation in each Annual Compliance Report.	N	N/A	Annual	Annual Compliance Report	Ongoing	
VIS	**4**	e	Y		Within 48 hours of receiving a lighting complaint, the project owner shall provide the CPM with a complaint resolution form report as specified in the Compliance General Conditions including a proposal to resolve the complaint, and a schedule for implementation.	N	48 hrs	within receipt	Lighting Complaint	Ongoing	
VIS	**4**	f	N		The project owner shall notify the CPM within 48 hours after completing implementation of the proposal.	N	48 hrs	within receipt	Lighting Complaint	Ongoing	
VIS	**4**	g	Y		A copy of the complaint resolution form report shall be submitted to the CPM within 30 days	N	30	after	Lighting Complaint	Ongoing	
VIS	**5**	a	Y	In order to address potential cumulative visual impacts resulting from I-5 widening, the project owner shall maintain a permanent buffer zone, including the existing vegetative visual screening, on the eastern portion of the CECP site, between the existing NRG fence line and storage tank perimeter road. This measure shall be coordinated with Conditions of Certification LAND-1 and HAZ-8, requiring construction of a tall wall/safety barrier at the future right-of-way. The existing landscape screening within the buffer zone shall be maintained and enhanced per Condition of Certification VIS-2 after start of project construction. The buffer zone shall be kept available to maintain existing visual screening, accommodate future possible I-5 widening to the extent necessary, and to accommodate both future hazard protection features and visual screening. In addition, the **project owner** shall work with Caltrans to develop a Cumulative Impact Mitigation Plan for accommodating the widening project while maintaining visual screening of the CECP to acceptable levels **over the long term following I-5 widening**. This plan could include complete or partial avoidance of the CECP site, complete or partial berm retention or replacement, complete or partial retention of existing landscape screening, and replacement screening as needed. The objective of the plan shall be to accommodate the I-5 widening within the designated buffer zone to the extent that encroachment is unavoidable, while providing needed hazard protection and acceptable levels of visual screening of the power plant.	At the earliest feasible time, the project owner shall coordinate with Caltrans to discuss specific hazard and visual mitigation strategies. The project owner shall work with Caltrans to devise a specific Cumulative Impact Mitigation Plan for accommodating hazard protection and visual screening, to be implemented at the time of I-5 widening.	N	N/A	earliest feasible time	I-5 Widening DEIS	Ongoing	

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VIS	**5**	b	Y	The Cumulative Impact Mitigation Plan shall include a landscape planting buffer zone along the entire CECP/I-5 boundary, to accommodate replacement tree canopy of sufficient height and density as to provide substantial visual screening of the tall amended CECP features, including exhaust stacks and transmission poles; and to substantially replace any existing tree canopy on the eastern CECP boundary lost to highway expansion. The landscape buffer may occupy portions of the CECP site, the Caltrans right-of-way, or both. Wherever feasible, the landscape buffer shall maintain a minimum 20 foot width. Where infeasible, exceptions shall be approved by the CPM. The solution developed under Condition of Certification VIS-5 shall not preclude relocation or undergrounding of transmission poles or other features, if necessary to provide the stipulated visual buffer or achieve adequate long-term project screening. Landscaping of the buffer zone shall include installation of large-container (24-inch box or larger, as needed), fast-growing evergreen trees in sufficient density to provide comparable or better visual screening of the CECP site than currently exists, within the shortest feasible period. Trees shall be selected and located so as to achieve substantial screening within a period of five years from the time of planting. The plan shall, at a minimum, include the following components: a. a record of discussions, meetings and planning activities conducted with Caltrans; b. the conclusions of these coordination activities; c. detailed plans, elevations, cross-sections or other details, including a detailed list of plants and container size, sufficient to fully convey how the objectives of effective visual screening of the CECP are to be achieved. To the extent possible, the plans shall comply with the city of Carlsbad Landscape Manual as applicable. The plan shall specifically address visual design of security barriers required under Condition of Certification HAZ-8 to ensure their aesthetic quality and compatibility. To the extent feasible, the plans shall conform with the intent of the Caltrans Design Guidelines for the I-5 NCC Project, Coastal Mesa Theme Unit (Caltrans 2013). ; and d. a proposed construction schedule	At the earliest feasible time, the project owner shall coordinate with Caltrans to discuss specific hazard and visual mitigation strategies. The project owner shall work with Caltrans to devise a specific Cumulative Impact Mitigation Plan for accommodating hazard protection and visual screening, to be implemented at the time of I-5 widening. Following coordination and plan development with Caltrans, the project owner shall submit a draft of the Cumulative Impact Mitigation Plan to the city of Carlsbad for review and comment, and to the CPM for review and approval, at least 180 days prior to completion by Caltrans of I-5 widening in the area of the CECP boundary.	N	180	prior to	I-5 Widening DEIS	Ongoing	
VIS	**5**	c		To the extent that it is necessary to plant or maintain vegetative screening on project lands transferred to Caltrans in furtherance of the widening project, the project owner shall be responsible for the costs of doing so, whether by reimbursement to Caltrans, performing the work itself under agreement with Caltrans or a third party (such as the City of Carlsbad) contracting with Caltrans, or some other means.	The project owner shall submit any required revisions within 30 days of notification by the CPM. The project owner shall not implement the plan until receiving approval from the CPM.	N	30	after	Revisions to Cumulative Impact Mitigation Plan	Ongoing	
VIS	**5**	d	N		After receiving approval, the project owner shall complete implementation of the mitigation plan at the earliest feasible opportunity, but not later than 180 days after plan approval.	N	180	after	I-5 Widening DEIS	Ongoing	
VIS	**5**	e	N		The project owner shall notify the CPM within seven days after implementing the approved plan that the plan is ready for inspection.	N	7	after	Implementation of plan	Ongoing	
WASTE	**9**	b	Y		The project owner shall submit any required revisions to the CPM within 20 days of notification from the CPM that revisions are necessary.	N	20	after	Commercial Operation	Ongoing	
WASTE	**9**	c	Y		The project owner shall also document in each Annual Compliance Report the actual volume of wastes generated and the waste management methods used during the year; provide a comparison of the actual waste generation and management methods used to those proposed in the original Operation Waste Management Plan; and update the Operation Waste Management Plan as necessary to address current waste generation and management practices.	N	N/A	Annual	Annual Compliance Report	Ongoing	

Technical Area	COC Number	Subtask	Deliverable Req.	Description	Verification/Action/Submittal Required	Required Prior to Start of Construction?	Action Days	Submittal Timing	Submittal Trigger Event	Compliance Status	Comments
WASTE	**11**		Y	The project owner shall ensure that all spills or releases of hazardous substances, materials, or waste are reported, cleaned up, and remediated as necessary, in accordance with all applicable federal, state, and local requirements.	The project owner shall document all unauthorized releases and spills of hazardous substances, materials, or wastes that occur on the project property or related pipeline and transmission corridors. The documentation shall include, at a minimum, the following information: location of release; date and time of release; reason for release; volume released; amount of contaminated soil/material generated; how release was managed and material cleaned up; if the release was reported; to whom the release was reported; release corrective action and cleanup requirements placed by regulating agencies; level of cleanup achieved and actions taken to prevent a similar release or spill; and disposition of any hazardous wastes and/or contaminated soils and materials that may have been generated by the release. Copies of the unauthorized spill documentation shall be provided to the CPM within 30 days of the date the release was discovered.	N	30	after	Release/Spill of Haz Mat	Ongoing	
WORKER SAFETY	**7**		Y	The project owner shall place a barrier of sufficient strength and height at the eastern fence line of the project at the widened I-5 Right-of-Way so as to prevent a runaway car or semi-trailer truck from piercing the barrier and going over the edge and down into the power plant site. This barrier shall also serve to prevent line-of-sight viewing of the power plant site from the shoulder of I-5. In designing this barrier, the project owner shall consult with Caltrans and then submit a final plan to the CPM for review and approval. The project owner may also negotiate cost-sharing of this barrier with Caltrans and if the project owner chooses to do so, the cost-sharing contract with Caltrans shall be submitted to the CPM for review and approval.	At least 60 days prior to the start of I-5 widening activities that encroach onto the project site, the project owner shall submit a copy of the final plans for the barrier and any cost-sharing contract to the CPM for review and approval.	N	60	prior to	I-5 Widening	Ongoing	Dependent on CalTrans Progress

Attachment M Additions to Compliance File