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Description:	ANNUAL COMPLIANCE REPORT- 2024
Filer:	Anwar Ali
Organization:	MRP San Joaquin Energy LLC
Submitter Role:	Commission Staff
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MRP San Joaquin Energy, LLC

April 24, 2025

Mr. Anwar Ali, Compliance Project Manager
California Energy Commission
1516 9th Street
Sacramento, CA 95814-5512

RE: Tracy Combined-Cycle Power Plant (08-AFC-07) 2024 Annual Report of Operations

Dear Mr. Ali,

In accordance with the Commission's Conditions of Certification for Tracy Combined Cycle Power Plant (08-AFC-07) Compliance-7, MRP San Joaquin Energy Inc. submits for your review and files the annual compliance reports for the period beginning on January 1, 2024 through December 31, 2024.

If you have any questions regarding the information provided in this report, please feel free to contact Mr. JT Shea at (209) 275-7079. E-mail: JTShea@mrpgenco.com Thank you for your time and consideration regarding this matter.

Respectfully,

Claude Couvillion
Senior Vice President of Operations & Development
Middle River Power

MRP San Joaquin Energy, LLC

Tracy Combined Cycle Power Plant Project
(08-AFC-07)

2024
Annual Compliance Report

Prepared by:
MRP San Joaquin Energy, LLC
Tracy, California

April 24, 2025

14950 W. SCHULTE RD; TRACY, CALIFORNIA 95377 – TEL. (209) 248-6841

Table of Contents

Report of Operations

Introduction

In accordance with the California Energy Commission requirements, condition compliance -7, MRP San Joaquin Energy LLC. (MRP) has prepared the 2024 Annual Compliance Report.

Project Description

The Tracy Combined Cycle Power Plant is a nominal 344 MW combined cycle power plant that consist of two 88 MW nominally rated General Electric Model PG 7121 EA combustion turbine generator sets with Heat Recovery Steam Generators with 380 MMBTU duct burners and a 168 nominally rated steam turbine shared by the two combustion turbine generators and associated equipment necessary for combined-cycle operation. The facility is located at 14950 West Schulte Road, Tracy, California.

Tracy Peaker Plant was licensed by the California Energy Commission (CEC) on July 19 2002 under Adoption Docket No. 01-AFC-16 and began commercial operations on June 1, 2003. On June 30, 2008, GWF Energy LLC submitted an Application for Certification to the California Energy commission to modify the peaker plant by converting the facility into a combined cycle power plant. On March 24, 2010, the California Energy Commission (CEC) issued a license to GWF Energy LLC (GWF) for the construction and operation of the GWF Tracy Combined Cycle Power Plant (TCC) (08-AFC-7C). After conversion was completed, both units started commercial operation on November 1, 2012. The units currently operate under a power purchase agreement with Pacific Gas and Electric Company that commenced on November 1, 2012 which expired on October 31, 2022. On November 2012, GWF Energy was acquired by Starwest, but continued to operate as GWF Energy LLC. On November of 2015, GWF Energy LLC was acquired by AltaGas and merged into the AltaGas San Joaquin Energy Inc. On November 2018, AltaGas San Joaquin Energy Inc. was acquired by Middle River Power and Merged into MRP San Joaquin Energy, LLC. (MRP)

This document constitutes the Annual Compliance Report (ACR) for the MRP Tracy Combined Cycle Power Plant (GWF Tracy project), as required by Condition of Certification (COC) General Compliance-7 (COMPL-7) in the CEC Final Decision. The information contained in this report covers all conditions applicable to the operations phase of this project. All construction related conditions were deemed complete.

Summary of Current Project

The units continue to operate under the power purchase agreement with Pacific Gas and Electric Company that commenced on November 1, 2012. They operate as required by PG&E based on power demands. Below is the production summary for the years 2012 - 2024.

Year	Unit A		Unit B	
	Fired Hours	MWh(net)	Fired Hours	MWh(net)
2012	1217	130,741	1269	123,934
2013	2675	303,394	2703	307,147
2014	2802	309,522	2968	332,923
2015	3558	388,521	3403	374,823
2016	1626	101,862	1546	99,865
2017	4030	475,374	3728	403,960
2018	3851	268,299	3725	257,735
2019	4750	296,664	3574	307,396
2020	2789	309,175	3649	393,493
2021	3493	388,26	3687	414,487
2022	1830	116,946	1624	105,675
2023	3349	411,134	3428	405,059
2024	4077	279054	3963	276533

*No significant changes to facility operations occurred during this reporting period.

Conditions of Certification Compliance Matrix

The COC compliance matrix is a tracking tool used by the CPM to assure compliance with all conditions assigned to the project. The compliance matrix was developed in September 2010. During site mobilization and construction phases, the matrix was used in the Monthly compliance report to satisfy condition Compliance-6. It has been modified to remove conditions of certification that were completed during mobilization, and construction phases and is now used to comply with the Annual reporting requirements of Compliance-7. A copy of the updated matrix for COC COMPL-5 is included in Appendix A.

Post Certification Changes

No post-certification changes occurred during this reporting period.

Permits and Applications

On May 14, 2013, Authority to construct permits (Permits N-4597-1-7, N-4597-2-7, N-4597-5-0, and N-4597-6-0) issued by SJVAPCD for conversion from simple cycle to combined cycle were administratively amended to incorporate the Authority to Construct to Title V Operating permits N-4597-1-7, N-4597-2-7, N-4597-5-0 and N-4597-6-0. The Title V permit also included permit

N-4597-4-3 to operate a diesel fired emergency IC engine as well as the facility wide permit N-4597-0-2.

On December 3, 2013, GWF submitted to SJVAPCD an application to renew the Title V operating permits for this facility. The new permits were received on February 17, 2015. The new Title V permits for facility permit N-4597 were Facility wide permit N-4597-0-3, Permit unit N-4597-1-8, N4597-2-8, N4597-4-4 and N4597-5-1 and N4597-6-1.

A permit renewal application was submitted on August 28, 2018 and a notice of complete application was received from the District on September 27, 2018. The SJVAPCD has finalized the permit renewal process. New permit numbers for facility permit N-4597 are facility wide permit N-4597-0-4, Permit unit N-4597-1-9, N4597-2-9, N4597-4-5, and N4597-5-2 and N-4597-6-2.

On November 7, 2019 Authorities to Construct (ATC) N-4597-1-10 and N-4597-2-10 were issued to change conditions for the Oxidation Catalyst modification. On March 5, 2021 Permits N-4597-1-11 and N-4597-2-11 were issued. Copies of the most recent permit is included in Appendix B.

A permit renewal application was submitted on October 30, 2023 and a notice of complete application was received from the district on January 11, 2024. The SJVAPCD has not finalized the permit renewal process as of 4/30/25.

Compliance Activities Scheduled for 2025

- CGA CEMS quarterly Audits, condition AQ-59 – To be scheduled for quarters 1st, 2nd, 3rd and 4th of 2025
- CTG source test, conditions AQ-46 and AQ-247 – To be scheduled for 2nd quarter 2025
- CTG CEMS RATA, condition AQ-60 – To be scheduled for 2nd quarter 2025
- Facility inspection by designated biologist, condition Bio-2 - To be scheduled for the 4th quarter 2025

Additions to Compliance Files

- CGA CEMS quarterly Audits, condition AQ-59 – Audits performed on January 2024, April 2024, July 2024, and October 2024.
- CTG source test, conditions AQ-46 and AQ-47 – Test performed on June 11 and 12, 2024.
- CTG CEMS RATA, condition AQ-60 – Test performed on June 11 and 12, 2024.
- Facility inspection by designated biologist, condition Bio-2 - Performed on November 18, 2024.

Contingency Plan for Unplanned Facility Closure Evaluation

Compliance-12 requires MRP to review the on-site contingency plan and recommend changes to bring the plan up to date. MRP has reviewed the plan and determined that the plan will not require updates. The plan was revised to reflect new management in 2023 by MRP San Joaquin

Energy, LLC, new insurance and other minor changes to the facility. A Copy of the revised contingency plan are also included in Appendix C.

There were no unplanned temporary closures of the plant during the reporting period. If unplanned temporary closures or unplanned permanent closures were to occur, MRP will follow CEC notification requirements outlined in condition Compliance-12 and Compliance-13 and prepare a closure plan as required.

Complaints, Notices of Violation, Official Warnings, and Citations

One Notice of Violation (NOV) was issued to Tracy Combined Cycle Power Plant on January 31, 2024 by the California Energy Commission regarding activities associated with the construction of a laydown area for a major Spring 2022 outage. No other complaints, other notices, or citations from any Regulatory agency in conjunction with the operations of the Tracy Combined Cycle Powerplant were received in 2024.

Specific Conditions

- **AQ-SC9- Wet Surface Air Cooler PM10 Emissions**

  This condition requires testing of the wet surface air cooler spray water for total dissolved solids (TDS) to determine compliance with an annual particulate matter emissions limit as PM10 of 110 lb/year.

  The spray water was tested the third quarter of 2024 as required and the emissions demonstrating compliance with the limit were calculated. Copies of the analytical report as well as the PM10 calculation are included in Appendix E.

- **Bio-2 Biological Resources Mitigation Implementation and Monitoring Plan**
  Mr. Dennis Lederer, designated Biologist, conducted a visual biological resources assessment of The Tracy Combined Cycle facility on November 18, 2024. The status report prepared by Mr. Lederer of TRC is provided in Appendix F.

- **Haz-1 - Hazardous Materials Inventory**
  Condition Haz-1 requires submittal in the annual report of the list of hazardous materials.

  An updated list of hazardous materials is included in Appendix G.

- **Haz-7 – Site Specific Operations Site Security Plan**
  Condition Haz-7 requires the project owner to maintain on site a site-specific operations site security plan and make it available for review and approval. A plan was prepared prior to the start of commissioning as required, reviewed in 2016 and is available at the site.

  This condition also requires the project owner to include in the annual report 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. One new employee was hired in 2024. Documents are provided in Appendix H.

- **Land-1 – Mitigation for the Loss of Farmland**
  This condition requires MRP to provide updates in the annual report on the status of farmland/easement purchase(s) and the continued implementation of the TCC's agricultural mitigation plan.

  On December 15, 2010, GWF submitted to the CPM the mitigation agreement between the Central Valley Farmland Trust and GWF Energy LLC that provides for the mitigation of prime farmland associated with the GWF Combined Cycle Project construction. Payment of the mitigation fees associated with the agreement was made on December 17, 2010.

  No changes have occurred since. The TCC agricultural mitigation plan that included the American Farmland Trust agreement (AFT) and a lease agreement between Kagehiro Ranches (Jepsen Webb Ranch, LLC) to continue the farming of the designated land are still in force.

- **Noise-2 – Noise Complaints**
  This condition requires MRP throughout the operation of the project to document, investigate, evaluate and attempt to resolve all project-related noise complaints.

  No complaints were received during the reporting period of 2024. See Appendix I.

- **Soil & Water-2 – Storm water BMP monitoring and maintenance activities.**
  The new storm water Industrial General Permit (IGP) became effective July 1, 2015. Alta Gas Tracy Combined Cycle Power plant filed a Notice of Intent to comply with the new IGP. MRP discharges all its storm water to the on-site storm water basin. In 2019, The site filed for a NOT (Notice of Termination) with the Regional Water Board and was approved based on exceptions for Natural Gas fired power plants.

  The site is equipped with storm water drains throughout the facility. The drains are covered with a fine steel mesh to keep any large materials from entering the drain system. In addition, the facility ground surfaces are either, asphalt (16.1%), concrete (28.2%), gravel (37.6%), soil (6.0%) and the basin takes up 12.1%. The only areas with exposed dirt are around the stormwater basin and the basin is protected from the inside by rocks to minimize erosion.

  The basin sediment level was calculated, and no changes were detected. The results are included in Appendix J.

- **Soil & Water-4 - Annual Water Use Summary**

When metering devices are serviced, tested and calibrated, this condition requires the project owner to provide a report summarizing these activities in the next annual report. The metering device (flow meter) calibration and a magnetic flowmeter verification were conducted in 2024.

The condition also requires the project owner to provide a Water Use Summary that states the source and quantity of raw surface water used on a monthly basis and on an annual basis in units of acre-feet. In subsequent annual reports the project owner is required to provide prior annual water use including yearly range and yearly average.

The report for the water flow meter calibration performed in 2024 and Water use summaries for the 2013 thru 2024 years are included in Appendix K.

- **Soil & Water-6 – Industrial Wastewater and Contact Stormwater.**
  This condition requires the owner provide evidence of industrial wastewater and contact stormwater disposal, via a licensed hauler, to an appropriately licensed facility in the annual compliance report.

  MRP discharges all its stormwater to the on-site stormwater basin. No stormwater leaves the site. Wastewater generated by turbine washing is hauled off-site and disposed of as non-hazardous waste. Contact storm water is collected in the secondary containment areas built around equipment to catch stormwater. The water is checked for oil residue and either left to evaporate or sent to the oil/water separator. The water from the clean water side of the oil/water separator is recycled to the raw water storage tank for use in the facility's water systems. Refer to Appendix L.

- **Vis-4 – Landscape Maintenance**
  This condition requires the project owner to report landscape maintenance activities, including replacement of dead vegetation, for the previous year of operation.

  MRP has a contract with Vegetation Solutions, located at 1211 Pinecrest Dr. in Concord, CA. The irrigation system is tested and repaired on a monthly basis or more often if required. Weed abatement is scheduled every two months. Tree trimming is on as required basis.

  No trees were replaced in 2024. Weeds were removed during the spring to 3 to 8 ft. from base of trees as required.

- **Vis-6 – Surface Treatment Maintenance**
  Vis-6 requires MRP to provide a status report regarding surface treatment maintenance.

  The report is provided in Appendix M.

- **Waste-6 – Hazardous Waste Disposal.**

Waste-6 requires the project owner to document in each Annual Compliance Report the actual volume of wastes generated and the waste management methods used during the year. It also requires the owner to 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.

The Waste Management Plan is included in Appendix N. The hazardous waste tables have been revised and copies of the revised tables as well as copies of the hazardous waste manifests and a summary of all wastes shipped out for disposal are included in Appendix N.

Appendix A

Compliance Matrix
Compliance-7

MRP San Joaquin Energy
Tracy Combined Cycle Power Plant

CEC Compliance Project Manager: Anwar Ali

ANNUAL COMPLIANCE MATRIX - PROJECT No. 08-AFC-07

Reporting Period: January 1, 2024 - December 31, 2024

COC No.	Condition Short Description		Verification Action	Submittal Timing	Submittal Trigger Event	Actual Submittal Date	Compliance Status
AQ-SC8	Quarterly operation reports		Submit the quarterly operation reports that include operational and emissions information including incidences of non-compliance; (see AQ conditions) to the to CPM and APCO .	No later than 30 days following the end of each calendar quarter.	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-SC8	Quarterly Operation Reports Records		This information shall be maintained on site for a minimum of five years and shall be provided to the CPM and District personnel upon request.	Upon request	Upon request		Ongoing
AQ-SC9	Wet surface air cooler requirements		The wet surface air cooler spray water shall be tested for total dissolved solids and that data shall be used to determine and report the particulate matter emissions from the wet surface air cooler. The wet surface air cooler spray water shall be tested at least once annually during the anticipated summer operation peak period (July through September).	Sample - 3rd quarter operations	3rd quarter operations	Samples Tested on: August 12, 2024	Sample - 3rd Quarterly Report
AQ-SC9	Wet surface air cooler requirements		Provide water quality test results and emissions estimates as part of the 4th quarter's quarterly operational report (AQ-SC8).	4th quarter operational report	4th quarter operational report	Quarterly January 24 2025	Report Sample - 4th Quarterly Report
Equipment Description, Unit N-4597-1-11 **Equipment Description, Unit N-4597-2-11**							
		Title V Permit conditon					
AQ-17	Particulate matter emissions - no exceed of 0.1 grains/dscf	Permit # 4597-1-11 and 2-11 condition # 1	Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. Submit results of source test to CPM and Air District in accordance with AQ-50	Annual Test	Source testing data becomes available	Source Test performance Dates: June 11 - June 12, 2024; Source Test report submittal date: August 8, 2024	see AQ-50 for submittal
AQ-18	Air contaminate release	NA	No air contaminant shall be released into the atmosphere which causes a public nuisance. The project owner shall make the site available for inspection by representatives of the District, ARB, and the Commission upon request.	Upon request	Request for site access		Ongoing, site is available for inspection upon request
AQ-19	Air contaminate discharge	Permit # 4597-0-4 condition #22	No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20 percent opacity. The project owner shall make the site available for inspection by representatives of the District, ARB, and the Commission upon request.	Upon request	Request for site access		Ongoing, site is available for inspection upon request
AQ-20	Breakdown Conditions - Notify the District within 1 hour	Permit # 4597-1-11 and 2-11 condition # 2	Owner/operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8).	Within an hour	Breakdown Conditions	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Ongoing and Quarterly Report (included in AQ-SC8)
AQ-21	Breakdown Conditions Reporting - Written Notification After Corrections are completed	Permit # 4597-1-11 and 2-11 condition # 3	The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8).	Within 10 days	Breakdown Conditions Reporting	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Ongoing and Quarterly Report (included in AQ-SC8)
AQ-22	Equipment operation / maintenance.	Permit # 4597-1-11 and 2-11 condition # 4	All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. The project owner shall make the site available for inspection by representatives of the District, ARB, and the Commission upon request.	Upon request	Request for site access		Ongoing, site is available for inspection upon request
AQ-23	Equipment operation / maintenance.	Permit # 4597-1-11 and 2-11 condition # 5	The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. The project owner shall make the site available for inspection by representatives of the District, ARB, and the Commission upon request.	Upon request	Request for site access		Ongoing, site is available for inspection upon request
AQ-24	Equipment operation / maintenance.	Permit # 4597-1-11 and 2-11 condition # 6	Combustion turbine generator (CTG) and electrical generator lube oil vents shall be equipped with mist eliminators. Visible emissions from lube oil vents shall not exhibit opacity of 5 percent or greater, except for up to three minutes in any hour. The project owner shall make the site available for inspection by representatives of the District, ARB, and the Commission upon request.	Upon request	Request for site access		Ongoing, site is available for inspection upon request
AQ-25	Equipment operation / maintenance.	Permit # 4597-1-11 and 2-11 condition # 7	A Selective Catalytic Reduction (SCR) system and an oxidation catalyst shall serve these gas turbines. The project owner shall make the site available for inspection by representatives of the District, ARB, and the Commission upon request.	Upon request	Request for site access		Ongoing, site is available for inspection upon request
AQ-26	Equipment operation / maintenance.	Permit # 4597-1-11 and 2-11 condition # 8	During all types of operation, including startup and shutdown periods, ammonia injection to to SCR shall occur once the minimum temperature at the catalyst face has been reached to ensure NOx emission reductions can occur with a reasonable level of ammonia slip. The project owner shall make the site available for inspection by representatives of the District, ARB, and the Commission upon request.	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Ongoing, site is available for inspection upon request

MRP San Joaquin Energy
Tracy Combined Cycle Power Plant

CEC Compliance Project Manager: Anwar Ali

ANNUAL COMPLIANCE MATRIX - PROJECT No. 08-AFC-07

Reporting Period: January 1, 2024 - December 31, 2024

COC No.	Condition Short Description		Verification Action	Submittal Timing	Submittal Trigger Event	Actual Submittal Date	Compliance Status
AQ-27	Equipment operation / maintenance.	Permit # 4597-1-11 and 2-11 condition # 9	The SCR system shall be equipped with a continuous temperature monitoring system to measure and record the temperature at the catalyst face. The project owner shall make the site available for inspection by representatives of the District, ARB, and the Commission upon request.	Upon request	Request for site access		Ongoing, site is available for inspection upon request
AQ-29	CTG exhaust/emissions	Permit # 4597-1-11 and 2-11 condition # 10	The CTG shall only be fired on PUC-regulated natural gas with a sulfur content value not exceeding 0.66 grains of sulfur compounds (as S) per 100 dry standard cubic feet on a daily basis and 0.25 grains of sulfur compounds (as S) per 100 dry standard cubic feet on a 12-month rolling average basis. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8).	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-30	CTG exhaust/emissions	Permit # 4597-1-11 and 2-11 condition # 11	Emission rates from this CTG without the duct burner firing, except during startup and shutdown periods, shall not exceed any of the following limits: NOX (as NO2) – 8.10 lb/hr and 2.0 ppmvd @ 15% O2; CO – 3.90 lb/hr and 2.0 ppmvd @ 15% O2; VOC (as methane) – 1.13 lb/hr and 1.5 ppmvd @ 15% O2; PM10 – 4.40 lb/hr; or SOX (as SO2) 2.03 lb/hr. NOX (as NO2) emission rates are one hour rolling averages. All other emission rates are three hour rolling averages. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8).	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-31	CTG exhaust/emissions	Permit # 4597-1-11 and 2-11 condition # 12	Emission rates from this CTG with the duct burner firing, except during startup and shutdown periods, shall not exceed any of the following limits: NOX (as NO2) – 10.30 lb/hr and 2.0 ppmvd @ 15% O2; CO – 6.00 lb/hr and 2.0 ppmvd @ 15% O2; VOC (as methane) – 3.22 lb/hr and 2.0 ppmvd @ 15% O2; PM10 – 5.80 lb/hr; or SOX (as SO2) – 2.63 lb/hr. NOX (as NO2) emission rates are one hour rolling averages. All other emission rates are three hour rolling averages.. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8).	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-32	CTG exhaust/emissions	Permit # 4597-1-11 and 2-11 condition # 13	During start-up, CTG exhaust emission rates shall not exceed any of the following limits: NOX (as NO2) – 390.5 lb/event; CO – 562.5 lb/event; VOC (as methane) – 10.5 lb/event; PM10 – 11.0 lb/event; or SOX (as SO2) – 4.1 lb/event. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8).	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-33	CTG exhaust/emissions	Permit # 4597-1-11 and 2-11 condition # 14	During shutdown, CTG exhaust emission rates shall not exceed any of the following limits: NOX (as NO2) –104.0 lb/event; CO – 148.0 lb/event; VOC (as methane) – 2.6 lb/event; PM10 – 3.0 lb/event; or SOX (as SO2) – 1.1 lb/event. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8).	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-34	CTG exhaust/emissions	Permit # 4597-1-11 and 2-11 condition # 15	A start up event is defined as the period beginning with the gas turbine initial firing until the unit meets the lb/hr and ppmvd emission limits in Condition 30 (AQ-30) or Condition 31 (AQ-31) depending on the operating conditions of the duct burners during the start up event. A shutdown event is defined as the period beginning with the turbine shutdown sequence and ending with the cessation of firing the gas turbine engine. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8).	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-35	Startup emissions	Permit # 4597-1-11 and 2-11 condition # 16	The duration of each startup shall not exceed three hours. Startup and shutdown emissions shall be counted toward all applicable emission limits. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8).	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-36	Shutdown emissions	Permit # 4597-1-11 and 2-11 condition # 17	The duration of each shutdown shall not exceed two hours. Startup and shutdown emissions shall be counted toward all applicable emission limits. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8).	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-37	Emissions	Permit # 4597-1-11 and 2-11 condition # 18	The emission control systems shall be in operation and emissions shall be minimized insofar as technologically feasible during startup and shutdown. The project owner shall make the site available for inspection by representatives of the District, ARB, and the Commission upon request.	Upon request	Request for site access		Ongoing, site is available for inspection upon request
AQ-38	Ammonia emissions	Permit # 4597-1-11 and 2-11 condition # 19	The ammonia (NH3) emissions shall not exceed 5 ppmvd @ 15% O2 or 9.40 lb/hr over a 24 hour rolling average. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8).	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-39	Ammonia emissions	Permit # 4597-1-11 and 2-11 condition # 20	Approved district calculation for the daily ammonia emissions using the following equation: (ppmvd @ 15% O2) = ((a - (b x c/1,000,000)) x (1,000,000 / b)) x d, d is the correction factor; derived annually during compliance testing by comparing the measured and calculated ammonia slip. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8).	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Ongoing - Calculate Annually

MRP San Joaquin Energy
Tracy Combined Cycle Power Plant

CEC Compliance Project Manager: Anwar Ali

ANNUAL COMPLIANCE MATRIX - PROJECT No. 08-AFC-07

Reporting Period: January 1, 2024 - December 31, 2024

COC No.	Condition Short Description		Verification Action	Submittal Timing	Submittal Trigger Event	Actual Submittal Date	Compliance Status
AQ-40	CTG Daily Emissions Limits	Permit # 4597-1-11 and 2-11 condition # 21	Daily emissions from the CTG shall not exceed the following limits: NOX (as NO2) – 814.9 lb/day; CO – 1071.6 lb/day; VOC – 78.6 lb/day; 139 PM10 – 132.0 lb/day; or SOX (as SO2) – 58.7 lb/day. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8).	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-41	CTG Annual Emissions - Annual Compliance	Permit # 4597-1-11 and 2-11 condition # 22	Annual emissions from the CTG, calculated on a twelve consecutive month rolling basis, shall not exceed any of the following limits: NOX (as NO2) – 88,881 lb/year; CO – 74,598 lb/year; VOC – 15,145 lb/year; PM10 – 32,250 lb/year; or SOX (as SO2) – 7,084 lb/year. Compliance with the annual NOx and CO emission limits shall be demonstrated using CEM data and compliance with the annual VOC, PM10 and SOx emission limits shall be demonstrated using the most recent source test results. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8).	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-42	Time	Permit # 4597-1-11 and 2-11 condition # 23	Each one hour period shall commence on the hour. Each one hour period in a three hour rolling average will commence on the hour. The three hour rolling average will be compiled from the three most recent one hour periods. Each one hour period in a twenty-four hour average for ammonia slip will commence on the hour. No verification necessary.	NA	NA		Ongoing
AQ-43	Emissions Time	Permit # 4597-1-11 and 2-11 condition # 24	Daily emissions will be compiled for a twenty-four hour period starting and ending at twelve-midnight. Each month in the twelve consecutive month rolling average emissions shall commence at the beginning of the first day of the month. The twelve consecutive month rolling average emissions to determine compliance with annual emissions limitations shall be compiled from the twelve most recent calendar months. No verification necessary.	NA	NA		Ongoing
AQ-44	Natural gas usage	Permit # 4597-1-11 and 2-11 condition # 25	The combined natural gas fuel usage for permit units N-4597-1 and N-45967-2 shall not exceed 20,454 scf/year. (District Rule 2550) A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8).	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-45	Collection of exhaust stack emissions	Permit # 4597-1-11 and 2-11 condition # 26	The exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NOX, CO, and O2 analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Emission Monitoring and Testing. Make site available for inspections by Air District, ARB, and CEC.	Upon request	Request for site access		Ongoing, site is available for inspection upon request
AQ-46	Source testing - steady state NOx, CO, VOC, and NH3 emission rates	Permit # 4597-1-11 and 2-11 condition # 27	The results and field data collected during source tests shall be submitted to the District and CPM within 60 days of testing and according to a pre-approved protocol (AQ-50).	Within 60 days after Source Testing	Completion of annual source testing	Source Test performance Dates: June 11 - June 12, 2024; Source Test report submittal date: August 8, 2024	Open Item - Annual Source Testing
AQ-47	Source testing - Annual PM10 emission rate	Permit # 4597-1-11 and 2-11 condition # 28	The results and field data collected during source tests shall be submitted to the District and CPM within 60 days of testing and according to a pre-approved protocol (AQ-50).	Within 60 days after Source Testing	Completion of annual source testing	Source Test performance Dates: June 11 - June 12, 2024; Source Test report submittal date: August 8, 2024	Open Item - Annual Source Testing
AQ-48	Source testing Commissioning - startup and shutdown Nox, CO, and VOC -Certifiable data	Permit # 4597-1-11 and 2-11 condition # 29	Source testing to measure startup and shutdown NOx, CO, and VOC mass emission rates shall be conducted for one of the gas turbines (N-4597-1 or N-4597-2) within 60 days after the end of the commissioning period. CEM relative accuracy for NOx and CO shall be determined during startup and shutdown source testing in accordance with 40 CFR 60, Appendix F (Relative Accuracy Audit). If CEM data is not certifiable to determine compliance with NOX and CO startup emission limits, then startup and shutdown NOx and CO testing shall be conducted every 12 months. The results and field data collected during source tests shall be submitted to the District and CPM within 60 days of testing and according to a pre-approved protocol (AQ-50). Testing for startup and shutdown emissions shall be conducted upon initial operation and at least once every seven years.	Within 60 days	Commissioning Completion of initial source testing	Initial Source Test performance Dates: October 31, 2012 Initial Source Test report submittal date: December 21, 2012 Most Recent Test performance Dates: August 13-14, 2019; Source Test report submittal date: October 03, 2019	Ongoing - Every seven years. Next test during the 2026 source test
AQ-48	Source testing - startup and shutdown Nox, CO, and VOC -Non-Certifiable data	Permit # 4597-1-11 and 2-11 condition # 29	If CEM data is not certifiable to determine compliance with NOX and CO startup emission limits, then startup and shutdown NOx and CO testing shall be conducted every 12 months. If an annual startup and shutdown NOx and CO relative accuracy audit demonstrates that the CEM data is certifiable, the startup and shutdown NOx and CO testing frequency shall return to the once every seven years schedule. The results and field data collected during source tests shall be submitted to the District and CPM within 60 days of testing and according to a pre-approved protocol (AQ-50). Testing for startup and shutdown emissions shall be conducted upon initial operation and at least once every seven years.	Within 60 days	Once every 12 months if Non-compliant	Initial Source Test performance Dates: October 31, 2012 Initial Source Test report submittal date: December 21, 2012 Most Recent Test performance Dates: August 13-14, 2019; Source Test report submittal date: October 03, 2019	Ongoing - Every seven years. Next test during the 2026 source test
AQ-49	Source testing- Gas Turbine and Aux Burner	Permit # 4597-1-11 and 2-11 condition # 30	Any gas turbine with an intermittently operated auxiliary burner shall demonstrate compliance with the auxiliary burner both on and off. The project owner shall submit the proposed protocol for the source tests to both the District and CPM for approval in accordance with Condition AQ-50	N/A	Demonstrate Compliance during source testing	Source Test Protocol Submittal Dates May 6, 2024	Ongoing
AQ-50	Source testing Notification	Permit # 4597-1-11 and 2-11 condition # 31	The District must be notified 30 days prior to any compliance source test; Submit correspondence in the MCR	No less than 30 days prior	Source testing	Source Test Protocol Submittal Dates May 6, 2024	Performed Annually
AQ-50-52; (AQ-137)	Source test plan	Permit # 4597-1-11 and 2-11 condition # 31	Submit proposed source testing plans to CPM and ARCO prior to source testing for approval	No less than 15 days prior	Planned source testing	Source Test Protocol Submittal Dates May 6, 2024	Submitted Annually

MRP San Joaquin Energy
Tracy Combined Cycle Power Plant

CEC Compliance Project Manager: Anwar Ali

ANNUAL COMPLIANCE MATRIX - PROJECT No. 08-AFC-07

Reporting Period: January 1, 2024 - December 31, 2024

COC No.	Condition Short Description		Verification Action	Submittal Timing	Submittal Trigger Event	Actual Submittal Date	Compliance Status
AQ-50	Source testing Results	Permit # 4597-1-11 and 2-11 condition # 31	Submit source test results no later than 60 days following the source test date to both the District and CPM	Within 60 days	Completion of annual source testing	Source Test performance Dates: June 11 - June 12, 2024; Source Test report submittal date: August 8, 2024	Submitted Annually
AQ-51	Source testing plan - Test Methods	Permit # 4597-1-11 and 2-11 condition # 32	The following test methods shall be used: NOx - EPA Method 7E or 20 or ARB Method 100 and EPA Method 19 (Acid Rain Program); CO - EPA Method 10 or 10B or ARB Method 100; VOC - EPA Method 18 or 25; PM10 - EPA Method 5 and 202 (front half and back half) or 201a and 202; ammonia - BAAQMD ST-1B; and O2 - EPA Method 3, 3A, or 20 or ARB Method 100. NOx testing shall also be conducted in accordance with the requirements of 40 CFR 60.4400(a)(2), (3), and (b). The project owner shall submit the proposed protocol for the source tests to both the District and CPM for approval in accordance with Condition AQ-50.	Include in the Annual Source Test Protocol	N/A	Source Test Protocol Submittal Dates May 6, 2024	Submitted Annually
AQ-52	Sulfur content - fuel sulfur content limit within Compliance	Permit # 4597-1-11 and 2-11 condition # 33	Testing to demonstrate compliance with the short-term (daily) fuel sulfur content limit shall be conducted monthly.	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	ongoing
AQ-52	Sulfur content - fuel sulfur content limit Non-Compliance	Permit # 4597-1-11 and 2-11 condition # 33	If a monthly test indicates that a violation of the daily fuel sulfur content limit has occurred then weekly testing shall commence and continue until eight consecutive tests show compliance. Once compliance with the daily fuel sulfur content is demonstrated on eight consecutive weekly tests, testing may return to the monthly schedule.	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	ongoing
AQ-52	Sulfur content - Unit is not Operating	Permit # 4597-1-11 and 2-11 condition # 33	If the unit is not operated during an entire calendar month, fuel sulfur content testing shall not be required for that specific month.	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	ongoing
AQ-52	Sulfur content	Permit # 4597-1-11 and 2-11 condition # 33	The result of the natural gas fuel sulfur monitoring data and other fuel sulfur content source data shall be submitted to the District and CPM in the quarterly operation report (AQ-SC8).	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-53	Sulfur content - Compliance with the rolling 12-month average fuel sulfur content limit	Permit # 4597-1-11 and 2-11 condition # 34	Compliance with the rolling 12-month average fuel sulfur content limit shall be demonstrated monthly. The 12-month rolling average fuel sulfur content shall be calculated as follows: 12-month rolling average fuel sulfur content = Sum of the monthly average fuel sulfur contents for the previous 12 months ÷ Total number of months the unit has operated in during the previous 12 months. The monthly average fuel sulfur content is the average fuel sulfur content of all tests conducted in a given month. Owner/operator shall keep a monthly record of the rolling 12-month average fuel sulfur content.	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-53	Sulfur content - Unit is not Operating	Permit # 4597-1-11 and 2-11 condition # 34	If the unit is not operated during an entire calendar month, fuel sulfur content testing shall not be required for that specific month. Owner/operator shall keep a monthly record of the rolling 12-month average fuel sulfur content.	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-53	Sulfur content - Compliance with the rolling 12-month average fuel sulfur content limit	Permit # 4597-1-11 and 2-11 condition # 34	The result of the natural gas fuel sulfur monitoring data and other fuel sulfur content source data shall be submitted to the District and CPM in the quarterly operation report (AQ-SC8).	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-54	Sulfur content - Methods of Monitoring	Permit # 4597-1-11 and 2-11 condition # 35	Fuel sulfur content shall be monitored using one of the following methods: ASTM Methods D1072, D3246, D4084, D4468, D4810, D6228, D6667 or Gas Processors Association Standard 2377. The result of the natural gas fuel sulfur monitoring data and other fuel sulfur content source data shall be submitted to the District and CPM in the quarterly operation report (AQ-SC8).	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-55	CTG fuel consumption	Permit # 4597-1-11 and 2-11 condition # 36	The CTG shall be equipped with a continuous monitoring system to measure and record fuel consumption. Make site available for inspections by Air District ARB, and CEC. Equip CTG unit with continuous monitoring system to record fuel consumption	Upon request	Request for site access		Open item, site is available for inspection upon request
AQ-59	CEMS audit.	Permit # 4597-1-11 and 2-11 condition # 40	Audits of continuous emission monitors shall be conducted quarterly, except during quarters in which relative accuracy and compliance source testing are both performed, in accordance with EPA guidelines. Audits of continuous emission monitors shall be conducted quarterly. The District shall be notified prior to completion of the audits.	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly. Except when RATA is performed.	CGA Performance dates January 17, 2024 April 4 & 11, 2024; July 11-12 2024; October 8-9, 2024; RATA June 11, 2024	Quarterly Report
AQ-59	CEMS audit. Report in quarterly reports	Permit # 4597-1-11 and 2-11 condition # 40	The project owner shall submit to the CPM and APCO CEMS audits demonstrating compliance with this Condition as part of the quarterly operation report (AQ-SC8)	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report

MRP San Joaquin Energy
Tracy Combined Cycle Power Plant

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ANNUAL COMPLIANCE MATRIX - PROJECT No. 08-AFC-07

Reporting Period: January 1, 2024 - December 31, 2024

COC No.	Condition Short Description		Verification Action	Submittal Timing	Submittal Trigger Event	Actual Submittal Date	Compliance Status
AQ-60	Relative accuracy test audit (RATA)	Permit # 4597-1-11 and 2-11 condition # 41	The owner/operator shall perform a relative accuracy test audit (RATA) for NOX, CO and O2 as specified by 40 CFR Part 60, Appendix F, 5.11, or 40 CFR Part 75 Appendix B, at least once every four calendar quarters. The owner/operator shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. If the RATA test is conducted as specified in 40 CFR Part 75 Appendix B, the RATA shall be conducted on a lb/MMBtu basis. The project owner shall submit to the CPM and APCO CEMS audits demonstrating compliance with this Condition as part of the quarterly operation report (AQ-SC8).	RATA perform once every four calendar quarters;	Annual	Source Test performance Dates: June 11 - June 12, 2024; Source Test report submittal date: August 8, 2024	Demonstrating compliance with this Condition as part of the quarterly operation report (AQ-SC8)
AQ-61	CEMS monitoring equipment / device inspections	Permit # 4597-1-11 and 2-11 condition # 42	APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the required monitoring devices to ensure that such devices are functioning properly. The project owner shall make the site available for inspection by representatives of the District, ARB, and the Commission to verify the monitoring devices are properly installed and operational.	Upon request	Request for site access.		Open item, site is available for inspection upon request
AQ-62	CEMS monitoring quality control / assurance	NA	The owner/operator shall develop and keep onsite a quality assurance plan for all the continuous monitoring equipment described in 40 CFR 60.4345(a), (c), and (d). The project owner shall make the site available for inspection by representatives of the District, ARB, and the Commission to verify the monitoring devices are properly installed and operational.	Upon request	Request for site access.		Open item, site is available for inspection upon request
AQ-63	Continuous Emission Monitoring System (CEM)	Permit # 4597-1-11 and 2-11 condition # 43	Results of the CEM system shall be averaged over a one hour period for NOX emissions and a three hour period for CO emissions using consecutive 15-minute sampling periods in accordance with all applicable requirements of 40 CFR 60.13. The project owner shall submit to the CPM and APCO CEMS audits demonstrating compliance with this Condition as part of the quarterly operation report (AQ-SC8).	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-64	Continuous Emission Monitoring System (CEM)	Permit # 4597-1-11 and 2-11 condition # 44	The owner or operator shall, upon written notice from the APCO, provide a summary of the data obtained from the CEM systems. This summary shall be in the form and the manner prescribed by the APCO. The project owner shall submit to the District and CPM the report of CEM operations upon notice from the APCO.	Upon notice from APCO	APCO Notification		Open Item- APCO Notification
AQ-65	Continuous Emission Monitoring System (CEM)	Permit # 4597-1-11 and 2-11 condition # 45	The facility shall install and maintain equipment, facilities, and systems compatible with the District's CEM data polling software system and shall make CEM data available to the District's automated polling system on a daily basis.	available to the District's on a daily basis	CEM data available to the District's automated polling system on a daily basis		ongoing
AQ-66	CEM system is NOT providing polling data	Permit # 4597-11 and 2-11 condition # 46	Upon notice by the District that the facility's CEM system is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEM data is sent to the District by a District-approved alternative method. The project owner shall provide required non-polled CEM data to the District by a District-approved alternative method.	District-approved alternative method	CEM system is not providing polling data		ongoing
AQ-67	Excess NOx emissions - 30 day rolling average	Permit # 4597-1-11 and 2-11 condition # 47	Excess NOx emissions shall be defined as any 30 day operating period in which the 30 day rolling average NOx concentration exceeds an applicable emissions limit. A 30 day rolling average NOx emission rate is the arithmetic average of all hourly NOx emission data in ppm measured by the continuous monitoring equipment for a given day and the twenty-nine unit operating days immediately preceding that unit operating day. A new 30 day average is calculated each unit operating day as the average of all hourly NOx emission rates for the preceding 30 unit operating days if a valid NOx emission rate is obtained for at least 75 percent of all operating hours. A period of monitor downtime shall be any unit operating hour in which sufficient data are not obtained to validate the hour for either NOx or O2 (or both).	N/A - No verification Required	N/A		ongoing
AQ-68	Continuous Emission Monitoring System (CEM) - NOx Emissions	Permit # 4597-1-11 and 2-11 condition # 48	For the purpose of determining excess NOx emissions, for each unit operating hour in which a valid hourly average is obtained, the data acquisition system and handling system must calculate and record the hourly NOx emission rate in units of ppm or lb/MMBtu, using the appropriate equation from Method 19 of 40 CFR 60 Appendix A. For any hour in which the hourly O2 concentration exceeds 19.0% O2, a diluents cap value of 19% O2 may be used in the emission calculations.	N/A - No verification Required	N/A		ongoing
AQ-69	Continuous Emission Monitoring System (CEM) - SOx Emissions	Permit # 4597-1-11 and 2-11 condition # 49	Excess SOx emissions is each unit operating hour included in the period beginning on the date and hour of any sample for which the fuel sulfur content exceeds the applicable limits listed in this permit and ending on the date and hour that a subsequent sample is taken that demonstrates compliance with the sulfur limit. Monitoring downtime for SOx begins when a sample is not taken by its due date. A period of monitor downtime for SOx also begins on the date and hour of a required sample, if invalid results are obtained. A period of SOx monitoring downtime ends on the date and hour of the next valid sample.	N/A - No verification Required	N/A		ongoing
AQ-70	Continuous Emission Monitoring System (CEM)	Permit # 4597-1-11 and 2-11 condition # 50	The owner or operator shall submit a written report of CEM operations for each calendar quarter to the APCO. The report is due on the 30th day following the end of the calendar quarter and shall include the following: Time intervals, data and magnitude of excess NOx emissions, nature and the cause of excess (if known), corrective actions taken and preventive measures adopted; Averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard; Applicable time and date of each period during which the CEM was inoperative (monitor downtime), except for zero and span checks, and the nature of system repairs and adjustments; A negative declaration when no excess emissions occurred. The project owner shall submit to the District and CPM the report of CEM operations, emission data, and monitor downtime data in the quarterly operation report (AQ-SC8) that follows the definitions of this Condition.	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report

MRP San Joaquin Energy
Tracy Combined Cycle Power Plant

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ANNUAL COMPLIANCE MATRIX - PROJECT No. 08-AFC-07

Reporting Period: January 1, 2024 - December 31, 2024

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AQ-71	NOx control system operating parameters	Permit # 4597-1-11 and 2-11 condition # 51	The owner/operator shall submit to the District information correlating the NOX control system operating parameters to the associated measured NOX output. The information must be sufficient to allow the District to determine compliance with the NOX emission limits of this permit during times that the CEMS is not functioning properly. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8).	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025 The determination of compliance with NOx emission limits if the CEM system is demonstrated using operating parameters and SCR conversion calculations. Predicted stack NOx is determined using a Prediction Neural Net. A neural net is a non-linear regression generated from JMP statistical software using operating data. The net developed for predicting stack NOx conversion three (3) nodes. Each node is an equation which uses three (3) operating parameters. 1.Ammonia Flow (lb/hr) 2.Stack Flow (kscfh) Stack Flow`= Fd*GCV*Gas Flow/1000000 * 20.9/(20.9-O2) 3.Total Gas Flow (kscfh) (Gas kscf/hr = CTG gas + DB Gas) The operating parameters fuel flow, engine NOx, SCR Temperature, ammonia flow and Stack O2 are used to provide inputs to the conversion equation. The Neural net formula for this determination is in column 5 The predicted Stack Nox is then determined as follows: Stack Nox = Inlet Nox - (Inlet Nox * Nox Conversion)	Submitted when CEMS not functioning properly. A breakdown report would be submitted in these cases along with the correlation methodology. Additional Information: H1_1: TanH(0.5 * ((-5.32140825617981) + 0.322556668572793 * :NH3 + -0.000144109788711927 * :Stk Flow + 0.00439854896669914 * :Total Gas)) H1_2: TanH(0.5 * ((-1.90686902055115) + -0.0371990125630299 * :NH3 + -0.0000164179601207946 * :Stk Flow + 0.00281388412898056 * :Total Gas)) H1_3: TanH(0.5 * ((-11.1980316912685) + 0.122250240321383 * :NH3 + -0.0000082984388193251 * :Stk Flow + 0.00730780287949905 * :Total Gas)) Nox Conversion: 0.686072768611141 + 0.0350836766682709 * :H1_1 + -0.208567171691691 * :H1_2 + -0.000046420227248374 2 * :H1_3
AQ-72	Continuous Emission Monitoring System (CEM)	Permit # 4597-1-11 and 2-11 condition # 52	The owner/operator shall maintain the following records: date and time, duration, and type of any startup, shutdown, or malfunction; performance testing, evaluations, calibrations, checks, adjustments, any period during which a continuous monitoring system or monitoring device was inoperative, and maintenance of any continuous emission monitor. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8).	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-73	Continuous Emission Monitoring System (CEM)	Permit # 4597-1-11 and 2-11 condition # 53	The owner/operator shall maintain the following records: hours of operation, fuel consumption (scf/hr and scf/rolling twelve month period), continuous emission monitor measurements, calculated ammonia slip, calculated NOx and CO mass emission rates (lb/hr and lb/twelve month rolling period), and VOC, PM10 and SOx emission rates (lb/twelve month rolling period). A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8).	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-74	System operating log	Permit # 4597-1-11 and 2-11 condition # 54	The owner/operator shall maintain a system operating log, updated on a daily basis, which includes the following information: The actual local start-up time and stop time, length and reason for reduced load periods, total hours of operation, and type and quantity of fuel used. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8).	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-75	SGT operation	Permit # 4597-1-11 and 2-11 condition # 55	The owner or operator of a stationary gas turbine system shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8).	Upon request	Request for site access.		Quarterly Report
Facility-wide Conditions							
Emergency Standby Generator Engine	**471 HP Caterpillar Model 3456 DI TA AA diesel-fired emergency IC engine powering a 300 kW electrical generator**						
AQ-104	Particulate Matter Emissions Limits (see AQ-111)	Permit # 4597-4-5 condition # 1	Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] The project owner shall submit the results of certification tests to both the District and CPM in accordance with AQ-111	NA	(see AQ-111)	No emissions testing required by SJVAPCD. Manufacturer Performance Specifications guarantee these levels of emissions. Manufacturers performance specifications available upon request	
AQ-105	No air contaminant - Released	NA	No air contaminant shall be released into the atmosphere which causes a public nuisance. The project owner shall make the site available for inspection by representatives of the District, ARB, and the Commission upon request	upon request	when requested	This condition was removed from the Title V operating Permit by the SJVAPCD on modification from Construction ATC to Title V operating permit	Open item, site is available for inspection upon request
AQ-106	No air contaminant - Discharged	NA	No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20 percent opacity. The project owner shall make the site available for inspection by representatives of the District, ARB, and the Commission upon request.	upon request	when requested	This condition was removed from the Title V operating Permit by the SJVAPCD on modification from Construction ATC to Title V operating permit	Open item, site is available for inspection upon request
AQ-107	Exhaust stack shall vent vertically upward	Permit # 4597-4-5 condition # 5	The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. The project owner shall make the site available for inspection by representatives of the District, ARB, and the Commission upon request.	upon request	when requested	This condition was changed from the Title V operating Permit by the SJVAPCD on modification from Construction ATC to Title V operating permit to read as follows: The exhaust stack(s) shall not be fitted with a fixed rain cap or any similar device…	Open item, site is available for inspection upon request
AQ-108	Engine - operational non-resettable elapsed time meter	Permit # 4597-4-5 condition # 4	This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. The project owner shall make the site available for inspection by representatives of the District, ARB, and the Commission upon request.	upon request	when requested		Open item, site is available for inspection upon request
AQ-109	CARB certified diesel fuel - Sulfur Limit	Permit # 4597-4-5 condition # 11	Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. The project owner shall make the site available for inspection by representatives of the District, ARB, and the Commission upon request.	upon request	when requested		Open item, site is available for inspection upon request

MRP San Joaquin Energy
Tracy Combined Cycle Power Plant

CEC Compliance Project Manager: Anwar Ali

ANNUAL COMPLIANCE MATRIX - PROJECT No. 08-AFC-07

Reporting Period: January 1, 2024 - December 31, 2024

COC No.	Condition Short Description		Verification Action	Submittal Timing	Submittal Trigger Event	Actual Submittal Date	Compliance Status
AQ-110	IC Engine Emissions Limits	Permit # 4597-4-5 conditions # 7, 8, and 9	Emissions from this IC engine shall not exceed any of the following limits: 4.69 g-NOx/bhp-hr, 0.12 g-CO/bhp-hr, or 0.04 g-VOC/bhp-hr. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8)	upon request	when requested	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-111	IC Engine Emissions Limits - PM10	Permit # 4597-4-5 condition # 10	Emissions from this IC engine shall not exceed 0.029 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8)	upon request	when requested	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-112	Engine	Permit # 4597-4-5 condition # 6	This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. The project owner shall make the site available for inspection by representatives of the District, ARB, and the Commission upon request.	upon request	when requested		Open item, site is available for inspection upon request
AQ-113	Engine	Permit # 4597-4-5 condition # 3	During periods of operation for maintenance, testing, and required regulatory purposes, the owner/operator shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8)	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Report	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-114	Emergency Situation Definition	Permit # 4597-4-5 condition # 12	An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the owner/operator.	NA	NA		Open item
AQ-115	Engine	Permit # 4597-4-5 condition # 13	This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8)	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Report	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-116	Engine - Operating Duration Limits (50 hrs/calendar yr)	Permit # 4597-4-5 condition # 14	This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8)	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Report	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-117	Engine - Monthly records of emergency and non-emergency operation	Permit # 4597-4-5 condition # 15	The owner/operator shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8)	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Report	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-118	Engine - Records Retained Onsite	Permit # 4597-4-5 condition # 24	All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request.	upon request	when requested		Open item, Records are available for inspection upon request
AQ-118	Engine - Records Retained Onsite	NA	A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8)	Quarterly Jan 30th; April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Report	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
Equipment Description, Unit N-4597-5-2	**39 MMBTU/HR natural gas-fired English and Tube Inc Model 28D375 Boiler with an Ultra-Low-NOx burner and Flue Gas Recirculation.**						
AQ-121	Particulate Matter Emissions Limits (see AQ-144)	Permit # 4597-5-2 condition # 1	Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. The project owner shall submit the results of fuel tests to both the District and CPM in accordance with AQ-144.	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	(see AQ-144)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	See AQ-144
AQ-122	No air contaminant - Released	NA	No air contaminant shall be released into the atmosphere which causes a public nuisance. The project owner shall make the site available for inspection by representatives of the District, ARB, and the Commission upon request.	upon request	when requested		Open item, site is available for inspection upon request
AQ-123	No air contaminant - Discharged	NA	No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20 percent opacity. The project owner shall make the site available for inspection by representatives of the District, ARB, and the Commission upon request.	upon request	when requested		Open item, site is available for inspection upon request
AQ-128	Equipment operation / maintenance	Permit # 4597-5-2 condition # 2	All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. The project owner shall make the site available for inspection by representatives of the District, ARB, and the Commission upon request.	upon request	when requested		Open item, site is available for inspection upon request

MRP San Joaquin Energy
Tracy Combined Cycle Power Plant

CEC Compliance Project Manager: Anwar Ali

ANNUAL COMPLIANCE MATRIX - PROJECT No. 08-AFC-07

Reporting Period: January 1, 2024 - December 31, 2024

COC No.	Condition Short Description		Verification Action	Submittal Timing	Submittal Trigger Event	Actual Submittal Date	Compliance Status
AQ-129	Operations of equipment - Flue gas recirculation	Permit # 4597-5-2 condition # 3	The flue gas recirculation (FGR) system shall be operated properly and shall be maintained per the manufacturer's recommendations. The project owner shall make the site available for inspection by representatives of the District, ARB, and the Commission upon request.	upon request	when requested		Open item, site is available for inspection upon request
AQ-130	Operations of equipment - Equipment Fuel Meter	Permit # 4597-5-4 condition # 4	A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of fuel combusted in the unit shall be installed, utilized and maintained. The fuel meter shall be calibrated per the fuel meter manufacturers recommendations. The project owner shall make the site available for inspection by representatives of the District, ARB, and the Commission upon request.	upon request	when requested		Open item, site is available for inspection upon request
AQ-131	Operations of equipment - Boiler Maximum Hrs-4,000 hrs/yr	Permit # 4597-5-2 condition # 5	The boiler shall operate a maximum of 4,000 hours per calendar year. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8).	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-132	Aux Boiler Sulfur Content	Permit # 4597-5-2 condition # 6	The boiler shall only be fired on PUC-regulated natural gas with a sulfur content value not exceeding 0.66 grains of sulfur compounds (as S) per 100 dry standard cubic feet on a daily basis and 0.25 grains of sulfur compounds (as S) per 100 dry standard cubic feet on a 12-month rolling average basis. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8).	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-133	Aux Boiler Emission rates	Permit # 4597-5-2 condition # 7	Emission rates from this unit shall not exceed any of the following limits: NOx (as NO2) – 6.0 ppmvd @ 3% O2 or 0.0073 lb/MMBtu; VOC (as methane) – 0.005 lb/MMBtu; CO - 50.0 ppmvd @ 3% O2 or 0.037 lb/MMBtu; PM10 - 0.007 lb/MMBtu; or SOx (as SO2) - 0.0019 lb/MMBtu. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8).	Annual Source Test	Annual Source Test	Source Test performance Date: January 24, 2017 January 31, 2020 January 19, 2023	Nox, CO and O2 are determined during source test. Compliance with SO2 is based on natural gas sulfur content and compliance with PM10 is demonstrated by calculation using AP42 Section 1.4.2 (particulate emission factor natural gas fired boilers). VOC has been demonstrated in practice by the use of Natural Gas as determined by SJVAPCD. See AQ-135.
AQ-135	Aux Boiler Source Testing	Permit # 4597-5-2 condition # 8	Source testing to measure NOx and CO emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. The project owner shall submit the proposed protocol for the source tests to both the District and CPM for approval in accordance with condition AQ-50	once every twelve (12) months	Source Testing	Source Test performance Date: January 24, 2017 and January 31, 2020 January 19, 2023	Annually +/- 30 days. Test demonstrated compliance in 2013, 2014, 2017, 2020, and 2023. Next test to be scheduled in 2026.
AQ-136	Aux Boiler	Permit # 4597-5-2 condition # 11	All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. The project owner shall submit the proposed protocol for the source tests to both the District and CPM for approval in accordance with condition AQ-50.	NA	NA	Source Test Protocol Submittal Dates December 13, 2016, December 9, 2019 & December 14, 2022	ongoing. Test demonstrated compliance in 2013, 2014, 2017, 2020, and 2023. Next test to be scheduled in 2026.
AQ-137	Aux Boiler Source Testing Plan	Permit # 4597-5-2 condition # 12	Source testing shall be conducted using the methods and procedures approved by the District. A source test plan must be submitted for approval at least 15 days prior to testing. The project owner shall submit the proposed protocol for the source tests to both the District and CPM for approval in accordance with condition AQ-50.	15 days prior	Aux Boiler Source Testing Plan	Source Test Protocol Submittal Dates December 13, 2016, December 9, 2019 & December 14, 2022	ongoing. Test demonstrated compliance in 2013, 2014, 2017, 2020, and 2023. Next test to be scheduled in 2026.
AQ-138	Aux Boiler Source Testing	Permit # 4597-5-2 condition # 12	The results of each source test shall be submitted to the District within 60 days thereafter. The project owner shall submit the proposed protocol for the source tests to both the District and CPM for approval in accordance with Condition AQ-50. The project owner shall submit source test results no later than 60 days following the source test date to both the District and CPM.	60 days following the source test	Source Testing - Aux Boiler	Source Test report submittal date: February 15, 2017 and February 18, 2020 March 16, 2023	ongoing. Test demonstrated compliance in 2013, 2014, 2017, 2020, and 2023. Next test to be scheduled in 2026.
AQ-139	Aux Boiler Source Testing Units	Permit # 4597-5-2 condition # 14	The source plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. The project owner shall submit the proposed protocol for the source tests to both the District and CPM for approval in accordance with condition AQ-50.	NA	NA	Source Test Protocol Submittal Dates December 13, 2016, December 9, 2019 & December 14, 2022	ongoing. Test demonstrated compliance in 2013, 2014, 2017, 2020, and 2023. Next test to be scheduled in 2026.
AQ-140	Aux Boiler Emissions Source Testing	Permit # 4597-5-2 condition # 15	For emissions source testing, the arithmetic average of three 30- consecutive-minute (or longer periods as necessary) test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. The project owner shall submit the proposed protocol for the source tests to both the District and CPM for approval in accordance with condition AQ-50.	NA	NA	Source Test Protocol Submittal Dates December 13, 2016, December 9, 2019 & December 14, 2022	ongoing. Test demonstrated compliance in 2013, 2014, 2017, 2020, and 2023. Next test to be scheduled in 2026.
AQ-141	Aux Boiler Source Testing - NOX emissions	Permit # 4597-5-2 condition # 16	NOX emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. The project owner shall submit the proposed protocol for the source tests to both the District and CPM for approval in accordance with condition AQ-50.	NA	NA	Source Test Protocol Submittal Dates December 13, 2016, December 9, 2019 & December 14, 2022	ongoing. Test demonstrated compliance in 2013, 2014, 2017, 2020, and 2023. Next test to be scheduled in 2026.
AQ-142	Aux Boiler Source Testing - CO emissions	Permit # 4597-5-2 condition # 17	CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. The project owner shall submit the proposed protocol for the source tests to both the District and CPM for approval in accordance with condition AQ-50.	NA	NA	Source Test Protocol Submittal Dates December 13, 2016, December 9, 2019 & December 14, 2022	ongoing. Test demonstrated compliance in 2013, 2014, 2017, 2020, and 2023. Next test to be scheduled in 2026.
AQ-143	Aux Boiler Source Testing - Stack Gas O2	Permit # 4597-5-2 condition # 18	Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. The project owner shall submit the proposed protocol for the source tests to both the District and CPM for approval in accordance with condition AQ-50.	NA	NA	Source Test Protocol Submittal Dates December 13, 2016, December 9, 2019 & December 14, 2022	ongoing. Test demonstrated compliance in 2013, 2014, 2017, 2020, and 2023. Next test to be scheduled in 2026.

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Tracy Combined Cycle Power Plant

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ANNUAL COMPLIANCE MATRIX - PROJECT No. 08-AFC-07

Reporting Period: January 1, 2024 - December 31, 2024

COC No.	Condition Short Description		Verification Action	Submittal Timing	Submittal Trigger Event	Actual Submittal Date	Compliance Status
AQ-144	Aux Boiler short-term (daily) fuel sulfur content limit	Permit # 4597-5-2 condition # 19	Testing to demonstrate compliance with the short-term (daily) fuel sulfur content limit shall be conducted monthly. If a monthly test indicates that a violation of the daily fuel sulfur content limit has occurred then weekly testing shall commence and continue until eight consecutive tests show compliance. Once compliance with the daily fuel sulfur content is demonstrated on eight consecutive weekly tests, testing may return to the monthly schedule. If the unit is not operated during an entire calendar month, fuel sulfur content testing shall not be required for that specific month. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8).	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-145	Sulfur content - Compliance with the rolling 12-month average fuel sulfur content limit	Permit # 4597-5-2 condition # 20	Compliance with the rolling 12-month average fuel sulfur content limit shall be demonstrated monthly. The 12-month rolling average fuel sulfur content shall be calculated as follows: 12-month rolling average fuel sulfur content = Sum of the monthly average fuel sulfur contents for the previous 12 months ÷ Total number of months the unit has operated in during the previous 12 months. The monthly average fuel sulfur content is the average fuel sulfur content of all tests conducted in a given month. Owner/operator shall keep a monthly record of the rolling 12-month average fuel sulfur content.	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-145	Sulfur content - Compliance with the rolling 12-month average fuel sulfur content limit	NA	The result of the natural gas fuel sulfur monitoring data and other fuel sulfur content source data shall be submitted to the District and CPM in the quarterly operation report (AQ-SC8).	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-146	Sulfur Content - Monitoring	Permit # 4597-5-2 condition # 21	Fuel sulfur content shall be monitored using one of the following methods: ASTM Methods D1072, D3246, D4084, D4468, D4810, D6228, D6667 or Gas Processors Association Standard 2377. The result of the natural gas fuel sulfur monitoring data and other fuel sulfur content source data shall be submitted to the District and CPM in the quarterly operation report (AQ-SC8).	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-147	CEMs protocol	NA	Provide Continuous Emission Monitoring System (CEM) protocol for approval by APCD and CPM at least 60 days prior to installation of CEM. Make site available for inspection.	at least 60 days prior and upon request	installation of CEM and upon request		MRP San Joaquin Energy is performing the Alternate monitoring scheme, A letter was submitted to the SJVAPCD and CPM and was approved on 6/7/12.
AQ-147	CEMs protocol	NA	Submit the chosen method of monitoring (either CEMS or chosen alternate monitoring scheme) at least 30 days prior to initial operation of this boiler. (District submittal number 29, not AQ-147)	at least 30 days prior	initial operation of this boiler		MRP San Joaquin Energy is performing the Alternate monitoring scheme, A letter was submitted to the SJVAPCD and CPM and was approved on 6/7/12.
AQ-147	CEMs protocol	NA	The project owner shall make the site available for inspection by representatives of the District, ARB and the Commission upon request.	upon request	when requested		MRP San Joaquin Energy is performing the Alternate monitoring scheme, A letter was submitted to the SJVAPCD and CPM and was approved on 6/7/12.
AQ-148	CEMs protocol	Permit # 4597-5-2 condition # 27	The exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NOx, CO, and O2 analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Source Emission Monitoring and Testing. The project owner shall make the site available for inspection by representatives of the District, ARB and the Commission upon request.	upon request	when requested		Site is available for inspection upon request
AQ-149	Daily Fuel Records	Permit # 4597-5-2 condition # 28	Owner/operator shall maintain daily records of the type and quantity of fuel combusted by the boiler. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8).	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report. Site is available for inspection upon request
AQ-150	Fuel Records	Permit # 4597-5-2 condition # 29	Owner/operator shall keep a record of the cumulative annual quantity of hours operated for this unit. The record shall be updated at least monthly. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8).	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-151	Records	Permit # 4597-5-2 condition # 30	All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8).	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report and site is available for inspection upon request
Equipment Description, Unit N-4597-6-2	**235 BHP Cummins Model CFP7E-50 TIER 3 diesel-fired emergency IC enginepowering a firewater pump or equivalent.**						
AQ-154	Particulate Matter Emissions Limits (see AQ-111)	Permit # 4597-6-2 condition # 1	Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. The project owner shall submit the results of certification tests to both the District and CPM in accordance with AQ-167.	NA	(see AQ-167)	Compliance of District Rule 4201.3.1 is via a CAPCOA/CARB/EPA IX Title V periodic Monitoring Recommendations memo dated July 2001. The District's grain loading limit of 0.1 grain/dscf does not need to be source tested provided the following conditions are met and are contained in the PTO. 1) Engine usage is limited to maintenance, testing, and time of actual unforeseen emergencies (see condition 8 below), 2) usage for maintenance and testing is not to exceed 200 hours per year (Condition 8 limits operation to 50 hours per year), and 3) maintain records of all engine usage and maintenance (see condition 10 below).	
AQ-155	No air contaminant - Released	NA	No air contaminant shall be released into the atmosphere which causes a public nuisance. The project owner shall make the site available for inspection by representatives of the District, ARB, and the Commission upon request.	upon request	when requested		
AQ-156	No air contaminant - Discharged	NA	No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20 percent opacity. The project owner shall make the site available for inspection by representatives of the District, ARB, and the Commission upon request.	upon request	when requested		

MRP San Joaquin Energy
Tracy Combined Cycle Power Plant

CEC Compliance Project Manager: Anwar Ali

ANNUAL COMPLIANCE MATRIX - PROJECT No. 08-AFC-07

Reporting Period: January 1, 2024 - December 31, 2024

COC No.	Condition Short Description		Verification Action	Submittal Timing	Submittal Trigger Event	Actual Submittal Date	Compliance Status
AQ-161	Equipment operation / maintenance.	Permit # 4597-6-2 condition # 2	The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. The project owner shall make the site available for inspection by representatives of the District, ARB, and the Commission upon request.	Upon request	Request for site access		Site is available for inspection upon requestg
AQ-162	Equipment Meter	Permit # 4597-6-2 condition # 3	This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. The project owner shall make the site available for inspection by representatives of the District, ARB, and the Commission upon request.	Upon request	Request for site access		Site is available for inspection upon requestg
AQ-163	Equipment operation	NA	This engine shall be equipped with either a positive crankcase ventilation (PCV) system that recirculates crankcase emissions into the air intake system for combustion, or a crankcase emissions control device of at least 90 percent control efficiency. The project owner shall make the site available for inspection by representatives of the District, ARB, and the Commission upon request.	Upon request	Request for site access		Site is available for inspection upon requestg
AQ-164	Equipment operation / maintenance.	Permit # 4597-6-2 condition # 4	This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. The project owner shall make the site available for inspection by representatives of the District, ARB, and the Commission upon request.	Upon request	Request for site access		Site is available for inspection upon requestg
AQ-165	Equipment Fuel - Sulfur Content	Permit # 4597-6-2 condition # 5	Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. The project owner shall make the site available for inspection by representatives of the District, ARB, and the Commission upon request.	Upon request	Request for site access	Invoices demonstrating type ol CARB diesel kept in facility	Site is available for inspection upon requestg
AQ-166	Equipment Emission Limits	Permit # 4597-6-2 condition # 6	Emissions from this IC engine shall not exceed any of the following limits: 2.67 g-NOx/bhp-hr, 2.39 g-CO/bhp-hr, or 0.16 g-VOC/bhp-hr. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8).	Upon request	Request for site access	Manufacturer Performance Specifications available upon request	Quarterly Report
AQ-167	Equipment Emission Limits for PM10	Permit # 4597-6-2 condition # 7	Emissions from this IC engine shall not exceed 0.12 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8).	Upon request	Request for site access	Manufacturer Performance Specifications available upon request	Quarterly Report
AQ-168	Engine - Operating Duration Limits (50 hrs/calendar yr)	Permit # 4597-6-2 condition # 8	This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems", 1998 edition. Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8).	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-169	Equipment operation / maintenance Records	Permit # 4597-6-2 condition # 10	The owner/operator shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, and the purpose of the operation (for example: load testing, weekly testing, emergency firefighting, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8).	Quarterly April 30th; July 30th; Oct 30th; Jan. 30th;	Quarterly Operations Reports -(Include in 4 quarterly reports from January 2024 to December 2024)	Quarterly April 29, 2024; July 30, 2024; October 16, 2024; January 24, 2025	Quarterly Report
AQ-170	Equipment Records	Permit # 4597-6-0 condition # 11	All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. A summary of significant operation and maintenance events and monitoring records required shall be included in the quarterly operation report (AQ-SC8).	Upon request	Request for site access		Quarterly Report
Bio-1			Submit temporary or permanent replacement request for Designated Biologist to CPM	10 Working days prior to replacement	Planned modification of Designated Biologist	Mr. Dennis Lederer was approved as Designated Biologist and Erin Bergquist as Alternate Designated Biologist on August 16,2023.	Construction Completed
Bio-2	Designated Biologist Duties		The Designated Biologist shall maintain written records of the tasks specified above and those included in the biological resources mitigation implementation and monitoring plan (BRMIMP), with summaries of these records submitted in the annual report		Annual Report	Facility inspection by Mr. Dennis Lederer was conducted on November 18, 2024. Report is included in Appendix F	Annual Report
Bio-2	Designated Biologist Duties		Designated Biologist for site inspection and annual report. Bio Inspection in the 3rd quarter of the year.	3rd Quarter	Annual Inspection	Facility inspection by Mr. Dennis Lederer was conducted on November 18, 2024. Report is included in Appendix F	Annual Report
Bio-2	Designated Biologist Duties		During project operation, the Designated Biologist shall submit record summaries in the annual compliance report as discussed in Bio-2 unless their duties are ceased as approved by the CPM.	NA	Annual Report	Facility inspection by Mr. Dennis Lederer was conducted on November 18, 2024. Report is included in Appendix F	Annual Report
Bio-2	Designated Biologist Duties		Designated Biologist performs relevant duties discussed in Bio-2 for plant closure.		Plant Closure	NA	Not Started - Plant Closure
Bio-2	Designated Biologist Duties		Perform - Designated Biologist performs required duties during all phases of the project.	NA	NA	Designated Biologist is assigned and approved. See above.	Construction Completed

MRP San Joaquin Energy
Tracy Combined Cycle Power Plant

CEC Compliance Project Manager: Anwar Ali

ANNUAL COMPLIANCE MATRIX - PROJECT No. 08-AFC-07

Reporting Period: January 1, 2024 - December 31, 2024

COC No.	Condition Short Description		Verification Action	Submittal Timing	Submittal Trigger Event	Actual Submittal Date	Compliance Status
Bio-4	Designated Biologist and Biological Monitor Activities		If required by the Designated Biologist and biological monitors, the operation managers shall halt site ground disturbance, grading, construction, and operation activities in areas specified by the Designated Biologist. Designated Biologist shall: • Require a halt to all activities in any area when there would be an unauthorized adverse impact to biological resources if the activities continued; • Inform the project owner and the operation managers when to resume activities; and • Notify the CPM if there is a halt of any activities, and advise the CPM of any corrective actions that have been taken, or shall be instituted, as a result of the work stoppage.. Submit notification to CMP of any non-compliance or ordered construction halt. Submit corrective actions	Next working day	Non-compliance event or halt in construction	No incidents have occurred since the start of commercial operations of the combined cycle power plant to require halting operations.	Ongoing - operations
Bio-5			Implement a CPM-approved worker environmental awareness program (WEAP) in which each of its employees, as well as employees of contractors and subcontractors who work on the project site or any related facilities during site mobilization, ground disturbance, grading, construction, operation, and closure are informed about sensitive biological resources associated with the project.		Worker Environmental Awareness Training	Training records available upon request	Ongoing - operations
Bio-5			Maintenance and contractor will be trained in accordance with the WEAP video; plant manager to provide training.		Worker Environmental Awareness Training	Training records available upon request	Ongoing - operations
Bio-5			Include a training acknowledgment form to be signed by each worker indicating that they received training and shall abide by the guidelines.		Worker Environmental Awareness Training	Training records available upon request	Ongoing - operations
Bio-5			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.	6 months after termination	operational personnel - termination of employment	Training records available upon request	Ongoing - operations
Compl-5	Compliance Matrix		Submit comprehensive compliance matrix (spreadsheet format) annually 1. The technical area; 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; 5. The expected or actual submittal date; 6. The date a submittal or action was approved by the Chief Building Official (CBO), CPM, or delegate agency, if applicable; 7. The compliance status of each Condition, e.g., “not started,” “in progress” or “completed” 8. If the Condition was amended, the date of the amendment.	Annual	Annual Reporting	Matrix Complete as per requirement. Submitted with this report in Appendix A	Annual Report
Compl-7	Annual Compliance Report		Submit Annually after construction 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 Annual Compliance Report. Each of these items must be identified in the transmittal letter, with the Condition it satisfies, and submitted as attachments to the Annual Compliance Report; 4. A cumulative listing of all post-Certification changes approved by the Energy Commission or cleared by the CPM; 5. An explanation for any submittal deadlines that were missed, accompanied by an estimate of when the information will be provided; 6. A listing of filings submitted to, or permits issued by, other governmental agencies during the year; 7. A projection of project compliance activities scheduled during the next year; 8. A listing of the year’s additions to the on-site compliance file; 9. An evaluation of the on-site contingency plan for unplanned facility closure, including any suggestions necessary for bringing the plan up to date [see Compliance Conditions for Facility Closure addressed later in this section]; and 10. A listing of complaints, notices of violation, official warnings, and citations received during the year, a description of the resolution of any resolved matters,	Operations/Post Construction	On-line operations	Report completed April 30, 2024.	Annual Report
Compl-9	Annual Fees		Submit payment of Annual energy Facility Compliance Fee, which is adjusted annually.	Annual Fee	July 1 of each year during certification	Payment submitted on 6/12/2024	
Compl-10	Reporting of Complaints, Notices, and Citations		Report all notices, complaints, violations to CPM The telephone number is posted at the project site and made easily visible to passersby during operation. This number is also posted on the Energy Commission’s web page.	Operations	Receipt of any complaints, notices, or violations	No complaints were received during the reporting period.	On going
Compl-10	Reporting of Complaints, Notices, and Citations		GWF will report and provide copies to the CPM of all complaint forms, including noise and lighting complaints, notices of violation, notices of fines, official warnings, and citations, within 10 days of receipt. Complaints shall be logged and numbered. Noise complaints shall be recorded on the form provided in the NOISE Conditions of Certification. All other complaints shall be recorded on the complaint form (Attachment A).	Within 10 days	Receipt of any complaints, notices, or violations	No complaints were received durng the reporting period.	On going
Compl-11	Planned Facility Closure		Submit closure plan to CPM	12-month prior to start of closure	Planned closure	NA	Not Started - Facility Closure
Compl-12	Unplanned Temporary Facility Closure		Submit on-site contingency plan to CPM	time agreed to by the CPM) prior to	Planned temporary closure	8/3/2012 Revised 041/23/19 New owner and insurance carrier	APPROVED
Compl-12	Unplanned Temporary Facility Closure		In the annual compliance reports submitted to the Energy Commission, the project owner will review the on-site contingency plan, and recommend changes to bring the plan up to date. Any changes to the plan must be approved by the CPM. The report includes the status of the insurance coverage and major equipment warranties must be updated in the annual compliance reports.	Annual	Annual Report	See above for changes	Annual Report
Compl-12	Unplanned Temporary Facility Closure		The project owner shall notify the CPM, as well as other responsible agencies, by telephone, fax, or e-mail, within 24 hours and shall take all necessary steps to implement the on-site contingency plan. The project owner shall keep the CPM informed of the circumstances and expected duration of the closure.	24 - hours for notification	Unplanned Temporary Facility Closure	There were no unplanned temporary facility closure this year.	Not Started - Unplanned Facility Closure

MRP San Joaquin Energy
Tracy Combined Cycle Power Plant

CEC Compliance Project Manager: Anwar Ali

ANNUAL COMPLIANCE MATRIX - PROJECT No. 08-AFC-07

Reporting Period: January 1, 2024 - December 31, 2024

COC No.	Condition Short Description		Verification Action	Submittal Timing	Submittal Trigger Event	Actual Submittal Date	Compliance Status
Compl-12	Unplanned Temporary Facility Closure		Unplanned temporary closure is likely to be permanent, or for a duration of more than 12 months, a closure plan consistent with the requirements for a planned closure shall be developed and submitted to the CPM within 90 days of the CPM's determination (or other period of time agreed to by the CPM).	within 90 days	Unplanned Temporary Facility Closure	There were no unplanned temporary facility closure this year.	Not Started - Unplanned Facility Closure
Compl-13	Unplanned Permanent Facility Closure		The project owner shall notify the CPM, as well as other responsible agencies, by telephone, fax, or e-mail, within 24 hours and shall take all necessary steps to implement the on-site contingency plan. The project owner shall keep the CPM informed of the circumstances and expected duration of the closure.	24 - hours for notification	Unplanned Permanent Facility Closure	There were no unplanned temporary facility closure this year.	Not Started - Unplanned Facility Closure
Compl-13	Unplanned Permanent Facility Closure		A closure plan, consistent with the requirements for a planned closure, shall be developed and submitted to the CPM within 90 days of the permanent closure or another period of time agreed to by the CPM.	within 90 days	Unplanned Permanent Facility Closure	There is no unplanned permament facility closure this year.	Not Started - Facility Closure
Waste-5	Waste Management enforcement actions		Notify CPM of any impending waste management-related enforcement action by any regulatory agencies.	Within 10 days	Issuance of a hazardous waste enforcement action	There are no impending waste management related inforcement action by any regulatory agency.	Ongoing - operations
Waste-6	Operation Waste Management Plan		Include in Annual Compliance Plan, actual volume of wastes generated, waste management methods, comparison of actual versus projects, and any Waste Management Plan updates. Copies of all required waste management permits, notices, and/or authorizations shall be included in the plan and updated as necessary	Annually	Annual Reporting	Volume of wastes generated is included in Appendix N. Also included waste management methods used as well as the plan updates that will be included in the revision of the waste management plan.	Annual Report
Haz-1	Haz Mat Business Plan Update		The project owner shall not use any hazardous materials not listed in Appendix B, below, or in greater quantities or strengths than those identified by chemical name in Appendix B, below, unless approved in advance by the Compliance Project Manager (CPM). The project owner shall provide to the CPM, in the Annual Compliance Report, a list of hazardous materials contained at the facility.	Annual Reporting	Annual Reporting	A list of Hazardous materials used at the site is provided in Appendix G	Annual Report
Haz-7	Operation Site Security Plan		Verify updates and compliance with Site Security Plan as part of Annual Report 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. The Operation Security Plan shall include the following: 1. Written standard procedures for employees, contractors, and vendors when encountering suspicious objects or packages on site or off site; 2. A statement (refer to sample, Attachment A), signed by the project owner certifying that background investigations have been conducted on all project personnel. B. A statement(s) (refer to sample, Attachment B), signed by the contractor or authorized representative(s) for any permanent contractors or other technical contractors 3. A statement(s) (refer to sample, Attachment C),	Annually	Annual Compliance Report	Statements and certifications that background investigations have been performed are included in Appendix H	Annual Report
Land-1	Prime farmland mitigation (3.28 acres)		Provide updates to CMP in the Annual Compliance Report on the status of farmland/easement purchases and the continued implementation of the TPP's agricultural mitigation plan; farmland and/or easements have been purchased within three years of the start of operation.	annual update; purchase farmland or easements by 2015	Annual Reporting	The TPP agricultural mitigation plan that included the American Farmland Trust agreement (AFT) and a lease agreement between Kagehiro Ranches (Jepsen Webb Ranch, LLC) to continue the farming of the designated land are still in force.	Annual Report
Noise-2	Noise Complaint Resolution - Construction and Operation		Document and resolve noise complaints; file Noise Complaint Resolution Form or similar instrument with CPM and local jurisdiction	Within 5 days	Receipt of noise complaint	No complaints were received during the reporting period. See Appendix I	During operation
			If noise mitigation is required and not resolved within 3 days, submit Noise Complaint Resolution for with CPM when mitigation is completed	Within 3 days	Noise complaint resolved	No complaints were received durng the reporting period. See Appendix I	During operation
S&W-2	Drainage, grading, and erosion & sediment control plans		Once operational, submit to the CPM with an annual compliance reports regarding results of stormwater BMP monitoring and maintenance activities. This plan shall address appropriate methods and actions, both temporary and permanent, for the protection of water quality and soil resources, demonstrate no increase in offsite flooding potential, meet local requirements, and identify all monitoring and maintenance activities. Monitoring activities shall include routine measurement of the volume of accumulated sediment in the stormwater retention basin. Maintenance activities must include removal of accumulated sediment from the retention basin when an average depth of 0.5 feet of sediment has accumulated in the retention basin. Civil-1: All maps shall be presented at a legible scale. <u>Verification</u>: Once operational, the project owner shall provide in the annual compliance report information on the results of stormwater BMP monitoring and maintenance activities.	Annually - During Operations	Annual Compliance Report	MRP San Joaquin Energy discharges all its storm water to the on-site storm water basin. The site is equipped with storm water drains throughout the facility. The drains are covered with a fine steel mesh to keep any large materials from entering the drain system. In addition, the facility ground surfaces are either asphalt (16.1%), concrete (28.2%), gravel (37.6%), soil (6.0%) and the basin takes up 12.1%. The only areas with exposed dirt are around the stormwater basin and the basin is protected from the inside by rocks to minimize erosion. The basin sediment level was calculated and no changes were detected. The results are included in Appendix J. On 2019, The site filed for a NOT (Notice of Termination) with the Regional Water Board and was approved based on exceptions for Natural Gas fired power plants.	Annual Report
			The facility submitted a Notice of Intent as required under the new Industrial General Stormwater Permit.			The facility submitted a Notice of Intent as required under the new Industrial General Stormwater Permit.	
S&W-4	Annual Water Use Summary		Provide monthly total water used, serviced, tested and calibrated, maintenance, and compliance activities to the CPM in the annual report, including a Water Use Summary. Water use shall not exceed the annual water-use limit of 54.4 acre-feet per year. The project owner shall monitor and record the total water used on a monthly basis. For calculating the annual water use, the term "year" will correspond to the date established for the annual compliance report submittal.	Annually	Annual Report	The water use summaries as well as the water flow meter calibrations are included in Appendix K.	Annual Report

MRP San Joaquin Energy
Tracy Combined Cycle Power Plant

CEC Compliance Project Manager: Anwar Ali

ANNUAL COMPLIANCE MATRIX - PROJECT No. 08-AFC-07

Reporting Period: January 1, 2024 - December 31, 2024

COC No.	Condition Short Description		Verification Action	Submittal Timing	Submittal Trigger Event	Actual Submittal Date	Compliance Status
S&W-4	Annual Water Use Summary		For the first year of operation, the project owner shall prepare an annual Water Use Summary, which will include the monthly range and monthly average of daily raw surface water usage in gallons per day, and total water used by the project on a monthly and annual basis in acre-feet.	Annually; First year of operation	Annually; First year of operation	The water use reports are included in Appendix K.	Annual Report
S&W-4	Annual Water Use Summary		For subsequent years, the annual Water Use Summary shall also include the yearly range and yearly average water use by the project; the monthly range and monthly average of daily raw surface water usage in gallons per day, and total water used by the project on a monthly and annual basis in acre-feet.	Annually	Annual Report	The water use reports are included in Appendix K.	Annual Report
S&W-6	Industrial wastewater and contact stormwater		Provide CPM evidence that industrial wastewater and contact stormwater disposal is being handled by a licensed disposal and transportation facility in the annual compliance report; Provide a copy of the manifest as evidence.	Annually	Annual Reporting	Refer to Appendix L of this report	Annual Report
Visual-4	Revised Perimeter Landscaping Plan		Submit a report on landscape maintenance activities, including replacement of dead vegetation, for the previous year of operation.	Annual	Annual Reporting	Report provided in the annual compliance report	Annual Report
Visual-5	Lighting Mitigation Plan		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.	Within 48 hours	Receipt of complaint	No complaints were received durng the reporting period.	Open item
Visual-5	Lighting Mitigation Plan		The project owner shall notify the CPM within 48 hours after completing implementation of the proposal.	Within 48 hours	Receipt of complaint	No complaints were received durng the reporting period.	Open item
Visual-5	Lighting Mitigation Plan		A copy of the complaint resolution form report shall be submitted to the CPM within 30 days	Within 30 days	Receipt of complaint	No complaints were received durng the reporting period.	Open item
Visual-6	Surface Treatment Maintenance		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.	Annual	Annual Reporting	Refer to Appendix M of this report	Annual Report
WS-5	Automatic External Defibrillator (AED)		Submit documentation that verifies an automatic external defibrillator (AED) is located on-site during construction and operations	30 days prior to site mobilization	Site Mobilization	22-Nov-10 7-Dec-10	Submitted invoice 22-Nov-10 Submitted photo 7-Dec-10 APPROVED
			Submit copy of training and maintenance program for AED to CPM; implement training program	30 days prior to site mobilization	Site Mobilization	CPR, First Aid and AED training performed on 05/27/2021, 6/1/2021. and 06/4/2021 by the Red Cross. AED inspections are performed monthly and batteries are replaced prior to expiration dates.	Ongoing - operations

Appendix B

Permits and Applications

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

January 11, 2024

Mr. Claude Couvillion
MRP San Joaquin Energy, LLC
14950 W Schulte Rd
Tracy, CA 95377

Re: Notice of Complete Title V Renewal Application
Facility Number: N-4597
Project Number: N-1234467

Dear Mr. Couvillion:

This letter is to inform you that the Title V renewal application for MRP San Joaquin Energy, LLC has been determined to be administratively complete. By receiving administrative completeness, your facility receives an application shield from federal enforcement action for failure to submit an application. If any permit modifications or changes are to be implemented prior to processing the renewed Title V permit, this application should be updated promptly to include those changes.

The District will perform a detailed review of each Title V permit application and will inform you of our findings. In the course of the detailed review, the District may find it necessary to request additional information. It is estimated that the analysis for this project will take 80 hours, including all hours preparing, noticing, and issuing the Title V permits. The current weighted labor rate is $107.00 per hour, but please note that this fee is revised annually to reflect actual costs and therefore may change.

If you have any questions about the Title V permitting process, please contact Mr. Nick Peirce of Permit Services at (209) 557-6400.

Sincerely,

Brian Clements
Director of Permit Services

Attachments

cc: Gerardo Rios, EPA (w/attachments) via EPS

Samir Sheikh
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: (661) 392-5500 FAX: (661) 392-5585

www.valleyair.org www.healthyairliving.com

Leach, Taylor

From: Tevin Hayes
Sent: Tuesday, January 16, 2024 12:55 PM
To: jcouvillion@mrpgenco.com
Cc: OA-PublicNotices; Johnathan Yoshimura
Subject: Title V Renewal for MRP San Joaquin Energy LLC, Facility N-4597, Project N-1234467
Attachments: TV Renewal N-1234467.pdf

Importance: High

Good Afternoon,

This letter is to inform you that the Title V renewal application for MRP San Joaquin Energy, LLC has been determined to be administratively complete. By receiving administrative completeness, your facility receives an application shield from federal enforcement action for failure to submit an application. If any permit modifications or changes are to be implemented prior to processing the renewed Title V permit, this application should be updated promptly to include those changes.

Please see attached Title V Renewal package.

Thank you,

Tevin Hayes
Senior Office Assistant
San Joaquin Valley Air Pollution Control District
1990 E. Gettysburg Avenue | Fresno, CA 93726
P. 559.230.6003 | F. 559.230.6000

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

FACILITY: N-4597-0-4 **EXPIRATION DATE:** 06/30/2024

FACILITY-WIDE REQUIREMENTS

1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit

11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit

12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit

13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit

14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit

15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit

16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit

17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit

18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit

19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit

20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit

21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit

22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit

24. All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit

25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit

26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit

27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit

28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit

29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8021] Federally Enforceable Through Title V Permit

30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8031] Federally Enforceable Through Title V Permit

31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8041] Federally Enforceable Through Title V Permit

32. Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8051] Federally Enforceable Through Title V Permit

33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8061] Federally Enforceable Through Title V Permit

34. Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8071] Federally Enforceable Through Title V Permit

35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit

37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit

38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit

39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

41. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin January 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

42. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

43. All equipment shall be maintained in proper operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit

44. The permittee shall maintain records of the cumulative annual facility-wide NOx, VOC, and PM10 emissions. The records shall be updated daily. [District Rule 2201] Federally Enforceable Through Title V Permit

45. Should the facility, as defined in 40 CFR 68.3, become subject to part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in 40 CFR 68.10. The facility shall certify compliance as part of the annual certification as required by 40 CFR Part 70. [40 CFR Part 68, Subpart G] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-4597-1-11 **EXPIRATION DATE:** 06/30/2024

EQUIPMENT DESCRIPTION:
88 MW NOMINALLY RATED COMBINED-CYCLE POWER GENERATING SYSTEM #1 CONSISTING OF A GENERAL ELECTRIC MODEL PG 7121 EA NATURAL GAS-FIRED COMBUSTION TURBINE GENERATOR WITH AN INLET AIR FILTRATION AND COOLING SYSTEM (EVAPORATIVE AND FOGGING) DRY LOW NOX COMBUSTION, A SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM WITH AMMONIA INJECTION, AN OXIDATION CATALYST, HEAT RECOVERY STEAM GENERATOR #1 (HRSG) WITH A 380 MMBTU/HR DUCT BURNER (MAXIMUM FIRING RATE 345 MMBTU/HR) AND A 168 MW NOMINALLY RATED STEAM TURBINE (SHARED WITH N-4597-2)

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Owner/operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1] Federally Enforceable Through Title V Permit
3. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102]
6. Combustion turbine generator (CTG) and electrical generator lube oil vents shall be equipped with mist eliminators. Visible emissions from lube oil vents shall not exhibit opacity of 5% or greater, except for up to three minutes in any hour. [District Rules 2201 and 4101] Federally Enforceable Through Title V Permit
7. A selective catalytic reduction (SCR) system and an oxidation catalyst shall serve this gas turbine engine. [District Rule 2201] Federally Enforceable Through Title V Permit
8. During all types of operation, including startup and shutdown periods, ammonia injection in to the SCR system shall occur once a minimum catalyst face temperature of 435 degrees Fahrenheit has been reached. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The SCR system shall be equipped with a continuous temperature monitoring system to measure and record the temperature at the catalyst face. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The CTG shall only be fired on PUC-regulated natural gas with a sulfur content value not exceeding 0.66 grains of sulfur compounds (as S) per 100 dry standard cubic feet on a daily basis and 0.25 grains of sulfur compounds (as S) per 100 dry standard cubic feet on a 12-month rolling average basis. [District Rule 2201 and 40 CFR 60.4330(a)(2)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

11. Emission rates from this CTG without the duct burner firing, except during startup and shutdown periods, shall not exceed any of the following limits: NOx (as NO2) - 8.10 lb/hr and 2.0 ppmvd @ 15% O2; CO - 3.90 lb/hr and 2.0 ppmvd @ 15% O2; VOC (as methane) - 1.13 lb/hr and 1.5 ppmvd @ 15% O2; PM10 - 4.40 lb/hr; or SOx (as SO2) - 2.03 lb/hr. NOx (as NO2) emission rates are one hour rolling averages. All other emission rates are three hour rolling averages. [District Rules 2201 and 4703 and 40 CFR 60.4320(a) & (b)] Federally Enforceable Through Title V Permit

12. Emission rates from this CTG with the duct burner firing, except during startup and shutdown periods, shall not exceed any of the following limits: NOx (as NO2) - 10.30 lb/hr and 2.0 ppmvd @ 15% O2; CO - 6.00 lb/hr and 2.0 ppmvd @ 15% O2; VOC (as methane) - 3.22 lb/hr and 2.0 ppmvd @ 15% O2; PM10 - 5.80 lb/hr; or SOx (as SO2) - 2.63 lb/hr. NOx (as NO2) emission rates are one hour rolling averages. All other emission rates are three hour rolling averages. [District Rules 2201 and 4703 and 40 CFR 60.4320(a) & (b)] Federally Enforceable Through Title V Permit

13. During start-up, CTG exhaust emission rates shall not exceed any of the following limits: NOx (as NO2) - 390.5 lb/event; CO - 562.5 lb/event; VOC (as methane) - 10.5 lb/event; PM10 - 11.0 lb/event; or SOx (as SO2) - 4.1 lb/event. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit

14. During shutdown, CTG exhaust emission rates shall not exceed any of the following limits: NOx (as NO2) -104.0 lb/event; CO - 148.0 lb/event; VOC (as methane) - 2.6 lb/event; PM10 - 3.0 lb/event; or SOx (as SO2) - 1.1 lb/event. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit

15. A start up event is defined as the period beginning with the gas turbine initial firing until the unit meets the steady state lb/hr and ppmvd emission limits of this permit. A shutdown event is defined as the period beginning with the turbine shutdown sequence and ending with the cessation of firing the gas turbine engine. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit

16. The duration of each startup shall not exceed three hours. Startup and shutdown emissions shall be counted toward all applicable emission limits. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit

17. The duration of each shutdown shall not exceed two hours. Startup and shutdown emissions shall be counted toward all applicable emission limits. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit

18. The emission control systems shall be in operation and emissions shall be minimized insofar as technologically feasible during startup and shutdown. [District Rule 2201 and 40 CFR 60.4333(a)] Federally Enforceable Through Title V Permit

19. The ammonia (NH3) emissions shall not exceed 5 ppmvd @ 15% O2 or 9.40 lb/hr over a 24 hour rolling average. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit

20. Compliance with the ammonia emission limits shall be demonstrated utilizing one of the following procedures: 1) calculate the daily ammonia emissions using the following equation: (ppmvd @ 15% O2) = ((a - (b x c/1,000,000)) x (1,000,000 / b)) x d, where a = ammonia injection rate (lb/hr) / (17 lb/lb mol), b = dry exhaust flow rate (lb/hr) / (29 lb/lb mol), c = change in measured NOx concentration ppmvd @ 15% O2 across the catalyst, and d = correction factor. The correction factor shall be derived annually during compliance testing by comparing the measured and calculated ammonia slip; or 2.) Utilize another District-approved calculation method using measured surrogate parameters to determine the daily ammonia emissions in ppmvd @ 15% O2. If this option is chosen, the owner/operator shall submit a detailed calculation protocol for District approval at least 60 days prior to commencement of operation. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit

21. Daily emissions from the CTG shall not exceed the following limits: NOx (as NO2) - 814.9 lb/day; CO - 1071.6 lb/day; VOC - 78.6 lb/day; PM10 - 132.0 lb/day; or SOx (as SO2) - 58.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

22. Annual emissions from the CTG, calculated on a twelve consecutive month rolling basis, shall not exceed any of the following limits: NOx (as NO2) - 88,881 lb/year; CO - 74,598 lb/year; VOC - 15,145 lb/year; PM10 - 32,250 lb/year; or SOx (as SO2) - 7,084 lb/year. Compliance with the annual NOx and CO emission limits shall be demonstrated using CEM data and compliance with the annual VOC, PM10 and SOx emission limits shall be demonstrated using the most recent source test results. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

23. Each one hour period shall commence on the hour. Each one hour period in a three hour rolling average will commence on the hour. The three hour rolling average will be compiled from the three most recent one hour periods. Each one hour period in a twenty-four hour average for ammonia slip will commence on the hour. [District Rule 2201] Federally Enforceable Through Title V Permit

24. Daily emissions will be compiled for a twenty-four hour period starting and ending at twelve-midnight. Each month in the twelve consecutive month rolling average emissions shall commence at the beginning of the first day of the month. The twelve consecutive month rolling average emissions to determine compliance with annual emissions limitations shall be compiled from the twelve most recent calendar months. [District Rule 2201] Federally Enforceable Through Title V Permit

25. The combined natural gas fuel usage for permit units N-4597-1 and N-4597-2 shall not exceed 20,454 MMscf/year. [District Rule 2550] Federally Enforceable Through Title V Permit

26. The exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NOx, CO, and O2 analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Emission Monitoring and Testing. [District Rule 1081] Federally Enforceable Through Title V Permit

27. Source testing to measure the steady state NOx, CO, VOC, and NH3 emission rates (lb/hr and ppmvd @ 15% O2) shall be conducted at least once every 12 months. [District Rules 1081, 2080, 2201 and 4703, 40 CFR 60.4340, and 40 CFR 60.4400] Federally Enforceable Through Title V Permit

28. Source testing to measure the PM10 emission rate (lb/hr) shall be conducted at least once every twelve months. [District Rule 1081, 2201 and 40 CFR 60.4400] Federally Enforceable Through Title V Permit

29. Source testing to measure startup and shutdown NOx, CO, and VOC mass emission rates shall be conducted for one of the gas turbines (N-4597-1 or N-4597-2) at least once every seven years. CEM relative accuracy for NOx and CO shall be determined during startup and shutdown source testing in accordance with 40 CFR 60, Appendix F (Relative Accuracy Audit). If CEM data is not certifiable to determine compliance with NOx and CO startup emission limits, then startup and shutdown NOx and CO testing shall be conducted every 12 months. If an annual startup and shutdown NOx and CO relative accuracy audit demonstrates that the CEM data is certifiable, the startup and shutdown NOx and CO testing frequency shall return to the once every seven years schedule. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit

30. Any gas turbine with an intermittently operated auxiliary burner shall demonstrate compliance with the auxiliary burner both on and off. [District Rule 4703] Federally Enforceable Through Title V Permit

31. Source testing shall be District witnessed, or authorized and samples shall be collected by a California Air Resources Board certified testing laboratory. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit

32. The following test methods shall be used: NOx - EPA Method 7E or 20 or ARB Method 100 and EPA Method 19 (Acid Rain Program); CO - EPA Method 10 or 10B or ARB Method 100; VOC - EPA Method 18 or 25; PM10 - EPA Method 5 and 202 (front half and back half) or 201a and 202; ammonia - BAAQMD ST-1B; and O2 - EPA Method 3, 3A, or 20 or ARB 100. NOx testing shall also be conducted in accordance with the requirements of 40 CFR 60.4400(a)(2), (3), and (b). EPA approved alternative test methods as approved by the District may also be used to address the source testing requirements of this permit. [District Rules 1081 and 4703 and 40 CFR 60.4400(1)(i) and 40 CFR 60.4400(a)(2), (3), and (b)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

33. Testing to demonstrate compliance with the short-term (daily) fuel sulfur content limit shall be conducted monthly. If a monthly test indicates that a violation of the daily fuel sulfur content limit has occurred then weekly testing shall commence and continue until eight consecutive tests show compliance. Once compliance with the daily fuel sulfur content is demonstrated on eight consecutive weekly tests, testing may return to the monthly schedule. If the unit is not operated during an entire calendar month, fuel sulfur content testing shall not be required for that specific month. [District Rule 2201 an 40 CFR 60.4360, 60.4365(a) and 60.4370(c)] Federally Enforceable Through Title V Permit

34. Compliance with the rolling 12-month average fuel sulfur content limit shall be demonstrated monthly. The 12-month rolling average fuel sulfur content shall be calculated as follows: 12-month rolling average fuel sulfur content = Sum of the monthly average fuel sulfur contents for the previous 12 months / total number of months the unit has operated in during the previous 12 months. The monthly average fuel sulfur content is the average fuel sulfur content of all tests conducted in a given month. If the unit is not operated during an entire calendar month, fuel sulfur content testing shall not be required for that specific month. Owner/operator shall keep a monthly record of the rolling 12-month average fuel sulfur content. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit

35. Fuel sulfur content shall be monitored using one of the following methods: ASTM Methods D1072, D3246, D4084, D4468, D4810, D6228, D6667 or Gas Processors Association Standard 2377. [40 CFR 60.4415(a)(1)(i)] Federally Enforceable Through Title V Permit

36. The CTG shall be equipped with a continuous monitoring system to measure and record fuel consumption. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit

37. The owner or operator shall install, certify, maintain, operate and quality-assure a Continuous Emission Monitoring System (CEMS) which continuously measures and records the exhaust gas NOx, CO and O2 concentrations. Continuous emissions monitor(s) shall monitor emissions during all types of operation, including during startup and shutdown periods, provided the CEMS passes the relative accuracy requirement for startups and shutdowns specified herein. If relative accuracy of CEMS cannot be demonstrated during startup conditions, CEMS results during startup and shutdown events shall be replaced with startup emission rates obtained from source testing to determine compliance with emission limits contained in this document. [District Rules 1080 and 4703] Federally Enforceable Through Title V Permit

38. The CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period or shall meet equivalent specifications established by mutual agreement of the District, the ARB and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit

39. The NOx, CO and O2 CEMS shall meet the requirements in 40 CFR 60, Appendix F Procedure 1 and Part 60, Appendix B Performance Specifications 2, 3, and 4, and/or 40 CFR 75 Appendix A, or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit

40. Audits of continuous emission monitors shall be conducted quarterly, except during quarters in which relative accuracy and compliance source testing are both performed, in accordance with EPA guidelines. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit

41. The owner/operator shall perform a relative accuracy test audit (RATA) for NOx, CO and O2 as specified by 40 CFR Part 60, Appendix F, 5.11, or 40 CFR Part 75 Appendix B, at least once every four calendar quarters. The owner/operator shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. If the RATA test is conducted as specified in 40 CFR Part 75 Appendix B, the RATA shall be conducted on a lb/MMBtu basis. [District Rule 1080] Federally Enforceable Through Title V Permit

42. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the required monitoring devices to ensure that such devices are functioning properly. [District Rule 1080] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

43. Results of the CEM system shall be averaged over a one hour period for NOx emissions and a three hour period for CO emissions using consecutive 15-minute sampling periods in accordance with all applicable requirements of 40 CFR 60.13. [District Rule 4703 and 40 CFR 60.13 and 40 CFR 60.4350(a)] Federally Enforceable Through Title V Permit

44. The owner or operator shall, upon written notice from the APCO, provide a summary of the data obtained from the CEM systems. This summary shall be in the form and the manner prescribed by the APCO. [District Rule 1080] Federally Enforceable Through Title V Permit

45. The facility shall install and maintain equipment, facilities, and systems compatible with the District's CEM data polling software system and shall make CEM data available to the District's automated polling system on a daily basis. [District Rule 1080] Federally Enforceable Through Title V Permit

46. Upon notice by the District that the facility's CEM system is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEM data is sent to the District by a District-approved alternative method. [District Rule 1080] Federally Enforceable Through Title V Permit

47. Excess NOx emissions shall be defined as any 30 day operating period in which the 30 day rolling average NOx concentration exceeds an applicable emissions limit. A 30 day rolling average NOx emission rate is the arithmetic average of all hourly NOx emission data in ppm measured by the continuous monitoring equipment for a given day and the twenty-nine unit operating days immediately preceding that unit operating day. A new 30 day average is calculated each unit operating day as the average of all hourly NOx emission rates for the preceding 30 unit operating days if a valid NOx emission rate is obtained for at least 75 percent of all operating hours. A period of monitor downtime shall be any unit operating hour in which sufficient data are not obtained to validate the hour for either NOx or O2 (or both). [40 CFR 60.4350(h) and 40 CFR 60.4380(b)(1)] Federally Enforceable Through Title V Permit

48. For the purpose of determining excess NOx emissions, for each unit operating hour in which a valid hourly average is obtained, the data acquisition system and handling system must calculate and record the hourly NOx emission rate in units of ppm or lb/MMBtu, using the appropriate equation from Method 19 of 40 CFR 60 Appendix A. For any hour in which the hourly O2 concentration exceeds 19.0 percent O2, a diluent cap value of 19 percent O2 may be used in the emission calculations. [40 CFR 60.4350(b)] Federally Enforceable Through Title V Permit

49. Excess SOx emissions is each unit operating hour included in the period beginning on the date and hour of any sample for which the fuel sulfur content exceeds the applicable limits listed in this permit and ending on the date and hour that a subsequent sample is taken that demonstrates compliance with the sulfur limit. Monitoring downtime for SOx begins when a sample is not taken by its due date. A period of monitor downtime for SOx also begins on the date and hour of a required sample, if invalid results are obtained. A period of SOx monitoring downtime ends on the date and hour of the next valid sample. [40 CFR 60.4385(a) and (c)] Federally Enforceable Through Title V Permit

50. The owner or operator shall submit a written report of CEM operations for each calendar quarter to the APCO. The report is due on the 30th day following the end of the calendar quarter and shall include the following: Time intervals, data and magnitude of excess NOx emissions, nature and the cause of excess (if known), corrective actions taken and preventive measures adopted; Averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard; Applicable time and date of each period during which the CEM was inoperative (monitor downtime), except for zero and span checks, and the nature of system repairs and adjustments; A negative declaration when no excess emissions occurred. [District Rule 1080 and 40 CFR 60.4375(a) and 60.4395] Federally Enforceable Through Title V Permit

51. The owner/operator shall submit to the District information correlating the NOx control system operating parameters to the associated measured NOx output. The information must be sufficient to allow the District to determine compliance with the NOx emission limits of this permit during times that the CEMS is not functioning properly. [District Rule 4703] Federally Enforceable Through Title V Permit

52. The owner/operator shall maintain the following records: date and time, duration, and type of any startup, shutdown, or malfunction; performance testing, evaluations, calibrations, checks, adjustments, any period during which a continuous monitoring system or monitoring device was inoperative, and maintenance of any continuous emission monitor. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

53. The owner/operator shall maintain the following records: hours of operation, fuel consumption (scf/hr and scf/rolling twelve month period), continuous emission monitor measurements, calculated ammonia slip, calculated NOx and CO mass emission rates (lb/hr and lb/twelve month rolling period), and VOC, PM10 and SOx emission rates (lb/twelve month rolling period). [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit

54. The owner/operator shall maintain a system operating log, updated on a daily basis, which includes the following information: The actual local start-up time and stop time, length and reason for reduced load periods, total hours of operation, and type and quantity of fuel used. [District Rule 4703] Federally Enforceable Through Title V Permit

55. The owner or operator of a stationary gas turbine system shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit

56. This unit shall be equipped with temperature measurement devices that continuously measure oxidation catalyst temperature. [40 CFR 64] Federally Enforceable Through Title V Permit

57. Except during periods of startup, shutdown, or when conducting combustor tuning activities, the measured oxidation catalyst temperature shall be equal to or greater than 450 degrees Fahrenheit and shall be less than or equal to 700 degrees Fahrenheit. [40 CFR 64] Federally Enforceable Through Title V Permit

58. Upon detecting any excursion from the acceptable oxidation catalyst temperature range, the owner/operator shall investigate the excursion and take corrective action to minimize the excursion and prevent the recurrence as expeditiously as possible. [40 CFR 64] Federally Enforceable Through Title V Permit

59. The owner/operator shall keep records of the oxidation catalyst temperature and any maintenance/repairs performed on the temperature monitoring system. [40 CFR 64] Federally Enforceable Through Title V Permit

60. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR 64] Federally Enforceable Through Title V Permit

61. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR 64] Federally Enforceable Through Title V Permit

62. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR part 64.8. [40 CFR 64] Federally Enforceable Through Title V Permit

63. The owners and operators of each affected source and each affected unit at the source shall: (i) Operate the unit in compliance with a complete Acid Rain permit application or a superceding Acid Rain permit issued by the permitting authority; and (ii) have an Acid Rain permit. [40 CFR 72] Federally Enforceable Through Title V Permit

64. The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75. [40 CFR 75] Federally Enforceable Through Title V Permit

65. The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program. [40 CFR 75] Federally Enforceable Through Title V Permit

66. The owners and operators of each source and each affected unit at the source shall: (i) hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and (ii) comply with the applicable Acid Rain emissions limitations for sulfur dioxide. [40 CFR 73] Federally Enforceable Through Title V Permit

67. Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act. [40 CFR 77] Federally Enforceable Through Title V Permit

68. An affected unit shall be subject to the sulfur dioxide requirements starting on the later of January 1, 2000, or the deadline for monitoring certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3) that is not a substitution or compensating unit. [40 CFR 72, 40 CFR 75] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

69. Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program. [40 CFR 72] Federally Enforceable Through Title V Permit

70. An allowance shall not be deducted in order to comply with the requirements under 40 CFR part 73, prior to the calendar year for which the allowance was allocated. [40 CFR 73] Federally Enforceable Through Title V Permit

71. An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or the written exemption under 40 CFR 72.7 and 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization. [40 CFR 72] Federally Enforceable Through Title V Permit

72. An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right. [40 CFR 72] Federally Enforceable Through Title V Permit

73. The owners and operators of the source and each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides. [40 CFR 72] Federally Enforceable Through Title V Permit

74. The designated representative of an affected unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77. [40 CFR 77] Federally Enforceable Through Title V Permit

75. The owners and operators of an affected unit that has excess emissions in any calendar year shall: (i) pay without demand the penalty required, and pay up on demand the interest on that penalty; and (ii) comply with the terms of an approved offset plan, as required by 40 CFR part 77. [40 CFR 77] Federally Enforceable Through Title V Permit

76. The owners and operators of the each affected unit at the source shall keep on site the following documents for a period of five years from the date the document is created. This period may be extended for cause, at any time prior to the end of five years, in writing by the Administrator or permitting authority: (i) The certificate of representation for the designated representative for the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site beyond such five-year period until such documents are superceded because of the submission of a new certificate of representation changing the designated representative. [40 CFR 72] Federally Enforceable Through Title V Permit

77. The owners and operators of each affected unit at the source shall keep on site each of the following documents for a period of five years from the date the document is created. This period may be extended for cause, at any time prior to the end of five years, in writing by the Administrator or permitting authority; (ii) All emissions monitoring information, in accordance with 40 CFR part 75; (iii) Copies of all reports, compliance certifications and other submissions and all records made or required under the Acid Rain Program; (iv) Copies of all documents used to complete an Acid Rain permit application and any other submission that demonstrates compliance with the requirements of the Acid Rain Program. [40 CFR 72, 40 CFR 75] Federally Enforceable Through Title V Permit

78. The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR 75 Subpart I. [40 CFR 75] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-4597-2-11 **EXPIRATION DATE:** 06/30/2024

EQUIPMENT DESCRIPTION:
88 MW NOMINALLY RATED COMBINED-CYCLE POWER GENERATING SYSTEM #2 CONSISTING OF A GENERAL ELECTRIC MODEL PG 7121 EA NATURAL GAS-FIRED COMBUSTION TURBINE GENERATOR WITH AN INLET AIR FILTRATION AND COOLING SYSTEM (EVAPORATIVE AND FOGGING) DRY LOW NOX COMBUSTION, A SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM WITH AMMONIA INJECTION, AN OXIDATION CATALYST, HEAT RECOVERY STEAM GENERATOR #1 (HRSG) WITH A 380 MMBTU/HR DUCT BURNER (MAXIMUM FIRING RATE 345 MMBTU/HR) AND A 168 MW NOMINALLY RATED STEAM TURBINE (SHARED WITH N-4597-1)

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Owner/operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1] Federally Enforceable Through Title V Permit
3. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102]
6. Combustion turbine generator (CTG) and electrical generator lube oil vents shall be equipped with mist eliminators. Visible emissions from lube oil vents shall not exhibit opacity of 5% or greater, except for up to three minutes in any hour. [District Rules 2201 and 4101] Federally Enforceable Through Title V Permit
7. A selective catalytic reduction (SCR) system and an oxidation catalyst shall serve this gas turbine engine. [District Rule 2201] Federally Enforceable Through Title V Permit
8. During all types of operation, including startup and shutdown periods, ammonia injection in to the SCR system shall occur once a minimum catalyst face temperature of 435 degrees Fahrenheit has been reached. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The SCR system shall be equipped with a continuous temperature monitoring system to measure and record the temperature at the catalyst face. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The CTG shall only be fired on PUC-regulated natural gas with a sulfur content value not exceeding 0.66 grains of sulfur compounds (as S) per 100 dry standard cubic feet on a daily basis and 0.25 grains of sulfur compounds (as S) per 100 dry standard cubic feet on a 12-month rolling average basis. [District Rule 2201 and 40 CFR 60.4330(a)(2)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

11. Emission rates from this CTG without the duct burner firing, except during startup and shutdown periods, shall not exceed any of the following limits: NOx (as NO2) - 8.10 lb/hr and 2.0 ppmvd @ 15% O2; CO - 3.90 lb/hr and 2.0 ppmvd @ 15% O2; VOC (as methane) - 1.13 lb/hr and 1.5 ppmvd @ 15% O2; PM10 - 4.40 lb/hr; or SOx (as SO2) - 2.03 lb/hr. NOx (as NO2) emission rates are one hour rolling averages. All other emission rates are three hour rolling averages. [District Rules 2201 and 4703 and 40 CFR 60.4320(a) & (b)] Federally Enforceable Through Title V Permit

12. Emission rates from this CTG with the duct burner firing, except during startup and shutdown periods, shall not exceed any of the following limits: NOx (as NO2) - 10.30 lb/hr and 2.0 ppmvd @ 15% O2; CO - 6.00 lb/hr and 2.0 ppmvd @ 15% O2; VOC (as methane) - 3.22 lb/hr and 2.0 ppmvd @ 15% O2; PM10 - 5.80 lb/hr; or SOx (as SO2) - 2.63 lb/hr. NOx (as NO2) emission rates are one hour rolling averages. All other emission rates are three hour rolling averages. [District Rules 2201 and 4703 and 40 CFR 60.4320(a) & (b)] Federally Enforceable Through Title V Permit

13. During start-up, CTG exhaust emission rates shall not exceed any of the following limits: NOx (as NO2) - 390.5 lb/event; CO - 562.5 lb/event; VOC (as methane) - 10.5 lb/event; PM10 - 11.0 lb/event; or SOx (as SO2) - 4.1 lb/event. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit

14. During shutdown, CTG exhaust emission rates shall not exceed any of the following limits: NOx (as NO2) -104.0 lb/event; CO - 148.0 lb/event; VOC (as methane) - 2.6 lb/event; PM10 - 3.0 lb/event; or SOx (as SO2) - 1.1 lb/event. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit

15. A start up event is defined as the period beginning with the gas turbine initial firing until the unit meets the steady state lb/hr and ppmvd emission limits of this permit. A shutdown event is defined as the period beginning with the turbine shutdown sequence and ending with the cessation of firing the gas turbine engine. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit

16. The duration of each startup shall not exceed three hours. Startup and shutdown emissions shall be counted toward all applicable emission limits. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit

17. The duration of each shutdown shall not exceed two hours. Startup and shutdown emissions shall be counted toward all applicable emission limits. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit

18. The emission control systems shall be in operation and emissions shall be minimized insofar as technologically feasible during startup and shutdown. [District Rule 2201 and 40 CFR 60.4333(a)] Federally Enforceable Through Title V Permit

19. The ammonia (NH3) emissions shall not exceed 5 ppmvd @ 15% O2 or 9.40 lb/hr over a 24 hour rolling average. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit

20. Compliance with the ammonia emission limits shall be demonstrated utilizing one of the following procedures: 1) calculate the daily ammonia emissions using the following equation: (ppmvd @ 15% O2) = ((a - (b x c/1,000,000)) x (1,000,000 / b)) x d, where a = ammonia injection rate (lb/hr) / (17 lb/lb mol), b = dry exhaust flow rate (lb/hr) / (29 lb/lb mol), c = change in measured NOx concentration ppmvd @ 15% O2 across the catalyst, and d = correction factor. The correction factor shall be derived annually during compliance testing by comparing the measured and calculated ammonia slip; or 2.) Utilize another District-approved calculation method using measured surrogate parameters to determine the daily ammonia emissions in ppmvd @ 15% O2. If this option is chosen, the owner/operator shall submit a detailed calculation protocol for District approval at least 60 days prior to commencement of operation. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit

21. Daily emissions from the CTG shall not exceed the following limits: NOx (as NO2) - 814.9 lb/day; CO - 1071.6 lb/day; VOC - 78.6 lb/day; PM10 - 132.0 lb/day; or SOx (as SO2) - 58.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

22. Annual emissions from the CTG, calculated on a twelve consecutive month rolling basis, shall not exceed any of the following limits: NOx (as NO2) - 88,881 lb/year; CO - 74,598 lb/year; VOC - 15,145 lb/year; PM10 - 32,250 lb/year; or SOx (as SO2) - 7,084 lb/year. Compliance with the annual NOx and CO emission limits shall be demonstrated using CEM data and compliance with the annual VOC, PM10 and SOx emission limits shall be demonstrated using the most recent source test results. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

23. Each one hour period shall commence on the hour. Each one hour period in a three hour rolling average will commence on the hour. The three hour rolling average will be compiled from the three most recent one hour periods. Each one hour period in a twenty-four hour average for ammonia slip will commence on the hour. [District Rule 2201] Federally Enforceable Through Title V Permit

24. Daily emissions will be compiled for a twenty-four hour period starting and ending at twelve-midnight. Each month in the twelve consecutive month rolling average emissions shall commence at the beginning of the first day of the month. The twelve consecutive month rolling average emissions to determine compliance with annual emissions limitations shall be compiled from the twelve most recent calendar months. [District Rule 2201] Federally Enforceable Through Title V Permit

25. The combined natural gas fuel usage for permit units N-4597-1 and N-4597-2 shall not exceed 20,454 MMscf/year. [District Rule 2550] Federally Enforceable Through Title V Permit

26. The exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NOx, CO, and O2 analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Emission Monitoring and Testing. [District Rule 1081] Federally Enforceable Through Title V Permit

27. Source testing to measure the steady state NOx, CO, VOC, and NH3 emission rates (lb/hr and ppmvd @ 15% O2) shall be conducted at least once every 12 months. [District Rules 1081, 2080, 2201 and 4703 and 40 CFR 60.4400] Federally Enforceable Through Title V Permit

28. Source testing to measure the PM10 emission rate (lb/hr) shall be conducted at least once every twelve months. [District Rule 1081, 2201 and 40 CFR 60.4400] Federally Enforceable Through Title V Permit

29. Source testing to measure startup and shutdown NOx, CO, and VOC mass emission rates shall be conducted for one of the gas turbines (N-4597-1 or N-4597-2) at least once every seven years. CEM relative accuracy for NOx and CO shall be determined during startup and shutdown source testing in accordance with 40 CFR 60, Appendix F (Relative Accuracy Audit). If CEM data is not certifiable to determine compliance with NOx and CO startup emission limits, then startup and shutdown NOx and CO testing shall be conducted every 12 months. If an annual startup and shutdown NOx and CO relative accuracy audit demonstrates that the CEM data is certifiable, the startup and shutdown NOx and CO testing frequency shall return to the once every seven years schedule. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit

30. Any gas turbine with an intermittently operated auxiliary burner shall demonstrate compliance with the auxiliary burner both on and off. [District Rule 4703] Federally Enforceable Through Title V Permit

31. Source testing shall be District witnessed, or authorized and samples shall be collected by a California Air Resources Board certified testing laboratory. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit

32. The following test methods shall be used: NOx - EPA Method 7E or 20 or ARB Method 100 and EPA Method 19 (Acid Rain Program); CO - EPA Method 10 or 10B or ARB Method 100; VOC - EPA Method 18 or 25; PM10 - EPA Method 5 and 202 (front half and back half) or 201a and 202; ammonia - BAAQMD ST-1B; and O2 - EPA Method 3, 3A, or 20 or ARB 100. NOx testing shall also be conducted in accordance with the requirements of 40 CFR 60.4400(a)(2), (3), and (b). EPA approved alternative test methods as approved by the District may also be used to address the source testing requirements of this permit. [District Rules 1081 and 4703 and 40 CFR 60.4400(1)(i) and 40 CFR 60.4400(a)(2), (3), and (b)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

33. Testing to demonstrate compliance with the short-term (daily) fuel sulfur content limit shall be conducted monthly. If a monthly test indicates that a violation of the daily fuel sulfur content limit has occurred then weekly testing shall commence and continue until eight consecutive tests show compliance. Once compliance with the daily fuel sulfur content is demonstrated on eight consecutive weekly tests, testing may return to the monthly schedule. If the unit is not operated during an entire calendar month, fuel sulfur content testing shall not be required for that specific month. [District Rule 2201 an 40 CFR 60.4360, 60.4365(a) and 60.4370(c)] Federally Enforceable Through Title V Permit

34. Compliance with the rolling 12-month average fuel sulfur content limit shall be demonstrated monthly. The 12-month rolling average fuel sulfur content shall be calculated as follows: 12-month rolling average fuel sulfur content = Sum of the monthly average fuel sulfur contents for the previous 12 months / total number of months the unit has operated in during the previous 12 months. The monthly average fuel sulfur content is the average fuel sulfur content of all tests conducted in a given month. If the unit is not operated during an entire calendar month, fuel sulfur content testing shall not be required for that specific month. Owner/operator shall keep a monthly record of the rolling 12-month average fuel sulfur content. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit

35. Fuel sulfur content shall be monitored using one of the following methods: ASTM Methods D1072, D3246, D4084, D4468, D4810, D6228, D6667 or Gas Processors Association Standard 2377. [40 CFR 60.4415(a)(1)(i)] Federally Enforceable Through Title V Permit

36. The CTG shall be equipped with a continuous monitoring system to measure and record fuel consumption. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit

37. The owner or operator shall install, certify, maintain, operate and quality-assure a Continuous Emission Monitoring System (CEMS) which continuously measures and records the exhaust gas NOx, CO and O2 concentrations. Continuous emissions monitor(s) shall monitor emissions during all types of operation, including during startup and shutdown periods, provided the CEMS passes the relative accuracy requirement for startups and shutdowns specified herein. If relative accuracy of CEMS cannot be demonstrated during startup conditions, CEMS results during startup and shutdown events shall be replaced with startup emission rates obtained from source testing to determine compliance with emission limits contained in this document. [District Rules 1080 and 4703 and 40 CFR 60.4335(b)(1)] Federally Enforceable Through Title V Permit

38. The CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period or shall meet equivalent specifications established by mutual agreement of the District, the ARB and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit

39. The NOx, CO and O2 CEMS shall meet the requirements in 40 CFR 60, Appendix F Procedure 1 and Part 60, Appendix B Performance Specifications 2, 3, and 4, and/or 40 CFR 75 Appendix A, or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit

40. Audits of continuous emission monitors shall be conducted quarterly, except during quarters in which relative accuracy and compliance source testing are both performed, in accordance with EPA guidelines. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit

41. The owner/operator shall perform a relative accuracy test audit (RATA) for NOx, CO and O2 as specified by 40 CFR Part 60, Appendix F, 5.11, or 40 CFR Part 75 Appendix B, at least once every four calendar quarters. The owner/operator shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. If the RATA test is conducted as specified in 40 CFR Part 75 Appendix B, the RATA shall be conducted on a lb/MMBtu basis. [District Rule 1080] Federally Enforceable Through Title V Permit

42. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the required monitoring devices to ensure that such devices are functioning properly. [District Rule 1080] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

43. Results of the CEM system shall be averaged over a one hour period for NOx emissions and a three hour period for CO emissions using consecutive 15-minute sampling periods in accordance with all applicable requirements of 40 CFR 60.13. [District Rule 4703 and 40 CFR 60.13 and 40 CFR 60.4350(a)] Federally Enforceable Through Title V Permit

44. The owner or operator shall, upon written notice from the APCO, provide a summary of the data obtained from the CEM systems. This summary shall be in the form and the manner prescribed by the APCO. [District Rule 1080] Federally Enforceable Through Title V Permit

45. The facility shall install and maintain equipment, facilities, and systems compatible with the District's CEM data polling software system and shall make CEM data available to the District's automated polling system on a daily basis. [District Rule 1080] Federally Enforceable Through Title V Permit

46. Upon notice by the District that the facility's CEM system is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEM data is sent to the District by a District-approved alternative method. [District Rule 1080] Federally Enforceable Through Title V Permit

47. Excess NOx emissions shall be defined as any 30 day operating period in which the 30 day rolling average NOx concentration exceeds an applicable emissions limit. A 30 day rolling average NOx emission rate is the arithmetic average of all hourly NOx emission data in ppm measured by the continuous monitoring equipment for a given day and the twenty-nine unit operating days immediately preceding that unit operating day. A new 30 day average is calculated each unit operating day as the average of all hourly NOx emission rates for the preceding 30 unit operating days if a valid NOx emission rate is obtained for at least 75 percent of all operating hours. A period of monitor downtime shall be any unit operating hour in which sufficient data are not obtained to validate the hour for either NOx or O2 (or both). [40 CFR 60.4350(h) and 40 CFR 60.4380(b)(1)] Federally Enforceable Through Title V Permit

48. For the purpose of determining excess NOx emissions, for each unit operating hour in which a valid hourly average is obtained, the data acquisition system and handling system must calculate and record the hourly NOx emission rate in units of ppm or lb/MMBtu, using the appropriate equation from Method 19 of 40 CFR 60 Appendix A. For any hour in which the hourly O2 concentration exceeds 19.0 percent O2, a diluent cap value of 19 percent O2 may be used in the emission calculations. [40 CFR 60.4350(b)] Federally Enforceable Through Title V Permit

49. Excess SOx emissions is each unit operating hour included in the period beginning on the date and hour of any sample for which the fuel sulfur content exceeds the applicable limits listed in this permit and ending on the date and hour that a subsequent sample is taken that demonstrates compliance with the sulfur limit. Monitoring downtime for SOx begins when a sample is not taken by its due date. A period of monitor downtime for SOx also begins on the date and hour of a required sample, if invalid results are obtained. A period of SOx monitoring downtime ends on the date and hour of the next valid sample. [40 CFR 60.4385(a) and (c)] Federally Enforceable Through Title V Permit

50. The owner or operator shall submit a written report of CEM operations for each calendar quarter to the APCO. The report is due on the 30th day following the end of the calendar quarter and shall include the following: Time intervals, data and magnitude of excess NOx emissions, nature and the cause of excess (if known), corrective actions taken and preventive measures adopted; Averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard; Applicable time and date of each period during which the CEM was inoperative (monitor downtime), except for zero and span checks, and the nature of system repairs and adjustments; A negative declaration when no excess emissions occurred. [District Rule 1080 and 40 CFR 60.4375(a) and 60.4395] Federally Enforceable Through Title V Permit

51. The owner/operator shall submit to the District information correlating the NOx control system operating parameters to the associated measured NOx output. The information must be sufficient to allow the District to determine compliance with the NOx emission limits of this permit during times that the CEMS is not functioning properly. [District Rule 4703] Federally Enforceable Through Title V Permit

52. The owner/operator shall maintain the following records: date and time, duration, and type of any startup, shutdown, or malfunction; performance testing, evaluations, calibrations, checks, adjustments, any period during which a continuous monitoring system or monitoring device was inoperative, and maintenance of any continuous emission monitor. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

53. The owner/operator shall maintain the following records: hours of operation, fuel consumption (scf/hr and scf/rolling twelve month period), continuous emission monitor measurements, calculated ammonia slip, calculated NOx and CO mass emission rates (lb/hr and lb/twelve month rolling period), and VOC, PM10 and SOx emission rates (lb/twelve month rolling period). [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit

54. The owner/operator shall maintain a system operating log, updated on a daily basis, which includes the following information: The actual local start-up time and stop time, length and reason for reduced load periods, total hours of operation, and type and quantity of fuel used. [District Rule 4703] Federally Enforceable Through Title V Permit

55. The owner or operator of a stationary gas turbine system shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit

56. This unit shall be equipped with temperature measurement devices that continuously measure oxidation catalyst temperature. [40 CFR 64] Federally Enforceable Through Title V Permit

57. Except during periods of startup, shutdown, or when conducting combustor tuning activities, the measured oxidation catalyst temperature shall be equal to or greater than 450 degrees Fahrenheit and shall be less than or equal to 700 degrees Fahrenheit. [40 CFR 64] Federally Enforceable Through Title V Permit

58. Upon detecting any excursion from the acceptable oxidation catalyst temperature range, the owner/operator shall investigate the excursion and take corrective action to minimize the excursion and prevent the recurrence as expeditiously as possible. [40 CFR 64] Federally Enforceable Through Title V Permit

59. The owner/operator shall keep records of the oxidation catalyst temperature and any maintenance/repairs performed on the temperature monitoring system. [40 CFR 64] Federally Enforceable Through Title V Permit

60. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR 64] Federally Enforceable Through Title V Permit

61. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR 64] Federally Enforceable Through Title V Permit

62. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR part 64.8. [40 CFR 64] Federally Enforceable Through Title V Permit

63. The owners and operators of each affected source and each affected unit at the source shall: (i) Operate the unit in compliance with a complete Acid Rain permit application or a superceding Acid Rain permit issued by the permitting authority; and (ii) have an Acid Rain permit. [40 CFR 72] Federally Enforceable Through Title V Permit

64. The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75. [40 CFR 75] Federally Enforceable Through Title V Permit

65. The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program. [40 CFR 75] Federally Enforceable Through Title V Permit

66. The owners and operators of each source and each affected unit at the source shall: (i) hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and (ii) comply with the applicable Acid Rain emissions limitations for sulfur dioxide. [40 CFR 73] Federally Enforceable Through Title V Permit

67. Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act. [40 CFR 77] Federally Enforceable Through Title V Permit

68. An affected unit shall be subject to the sulfur dioxide requirements starting on the later of January 1, 2000, or the deadline for monitoring certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3) that is not a substitution or compensating unit. [40 CFR 72, 40 CFR 75] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

69. Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program. [40 CFR 72] Federally Enforceable Through Title V Permit

70. An allowance shall not be deducted in order to comply with the requirements under 40 CFR part 73, prior to the calendar year for which the allowance was allocated. [40 CFR 73] Federally Enforceable Through Title V Permit

71. An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or the written exemption under 40 CFR 72.7 and 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization. [40 CFR 72] Federally Enforceable Through Title V Permit

72. An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right. [40 CFR 72] Federally Enforceable Through Title V Permit

73. The owners and operators of the source and each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides. [40 CFR 72] Federally Enforceable Through Title V Permit

74. The designated representative of an affected unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77. [40 CFR 77] Federally Enforceable Through Title V Permit

75. The owners and operators of an affected unit that has excess emissions in any calendar year shall: (i) pay without demand the penalty required, and pay up on demand the interest on that penalty; and (ii) comply with the terms of an approved offset plan, as required by 40 CFR part 77. [40 CFR 77] Federally Enforceable Through Title V Permit

76. The owners and operators of the each affected unit at the source shall keep on site the following documents for a period of five years from the date the document is created. This period may be extended for cause, at any time prior to the end of five years, in writing by the Administrator or permitting authority: (i) The certificate of representation for the designated representative for the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site beyond such five-year period until such documents are superceded because of the submission of a new certificate of representation changing the designated representative. [40 CFR 72] Federally Enforceable Through Title V Permit

77. The owners and operators of each affected unit at the source shall keep on site each of the following documents for a period of five years from the date the document is created. This period may be extended for cause, at any time prior to the end of five years, in writing by the Administrator or permitting authority; (ii) All emissions monitoring information, in accordance with 40 CFR part 75; (iii) Copies of all reports, compliance certifications and other submissions and all records made or required under the Acid Rain Program; (iv) Copies of all documents used to complete an Acid Rain permit application and any other submission that demonstrates compliance with the requirements of the Acid Rain Program. [40 CFR 72, 40 CFR 75] Federally Enforceable Through Title V Permit

78. The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR 75 Subpart I. [40 CFR 75] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-4597-4-5 **EXPIRATION DATE:** 06/30/2024

EQUIPMENT DESCRIPTION:
471 HP CATERPILLAR MODEL 3456 DI TA AA DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING A 300 KW ELECTRICAL GENERATOR

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
3. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702] Federally Enforceable Through Title V Permit
4. This engine shall be equipped with a non-resettable hour meter with a minimum display capability of 9,999 hours, unless the District determines that a non-resettable hour meter with a different minimum display capability is appropriate in consideration of the historical use of the engine and the owner or operator's compliance history. [District Rule 4702, 17 CCR 93115, and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
5. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
6. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702] Federally Enforceable Through Title V Permit
7. NOx emissions shall not exceed 4.69 g/hp-hr. [District Rule 2201] Federally Enforceable Through Title V Permit
8. CO emissions shall not exceed 0.12 g/hp-hr. [District Rule 2201] Federally Enforceable Through Title V Permit
9. VOC emissions shall not exceed 0.04 g/hp-hr. [District Rule 2201] Federally Enforceable Through Title V Permit
10. PM10 emissions shall not exceed 0.029 g/bhp-hr based on U.S EPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
11. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, and 17 CCR 93115] Federally Enforceable Through Title V Permit
12. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
13. This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

14. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rule 4702, 17 CCR 93115, and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

15. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit

16. The permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

17. The engine's oil and filter shall be changed every 500 hours of operation or every 12 months, whichever comes first. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

18. The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d of Subpart ZZZZ. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator 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 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 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. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

19. The engine's air filter shall be inspected every 1,000 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

20. The engine's hoses and belts shall be inspected every 500 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

21. The permittee shall maintain monthly records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. The permittee shall also maintain monthly records of action taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [District Rule 1070 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

22. The permittee must collect and submit an annual report including location, dates and times of operation if the engine operates for more than 15 hours and up to 100 hours per year for emergency demand response. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

23. The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit

24. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rule 4702, 17 CCR 93115, and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-4597-5-2 **EXPIRATION DATE:** 06/30/2024

EQUIPMENT DESCRIPTION:
39 MMBTU/HR NATURAL GAS-FIRED ENGLISH BOILER AND TUBE INC MODEL 28D375 BOILER (S/N 31015) WITH AN ULTRA-LOW-NOX BURNER AND FLUE GAS RECIRCULATION

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The flue gas recirculation (FGR) system shall be operated properly and shall be maintained per the manufacturer's recommendations. [District Rule 2201] Federally Enforceable Through Title V Permit
4. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of fuel combusted in the unit shall be installed, utilized and maintained. The fuel meter shall be calibrated per the fuel meter manufacturer's recommendations. [District Rule 2201 and 40 CFR 60.48 (c)(g)] Federally Enforceable Through Title V Permit
5. The boiler shall operate a maximum of 4,000 hours per calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The boiler shall only be fired on PUC-regulated natural gas with a sulfur content value not exceeding 0.66 grains of sulfur compounds (as S) per 100 dry standard cubic feet on a daily basis and 0.25 grains of sulfur compounds (as S) per 100 dry standard cubic feet on a 12-month rolling average basis. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Emission rates from this unit shall not exceed any of the following limits: NOx (as NO2) - 6 .0 ppmvd @ 3% O2 or 0.0073 lb/MMBtu; VOC (as methane) - 0.005 lb/MMBtu; CO - 50.0 ppmvd @ 3% O2 or 0.037 lb/MMBtu; PM10 - 0.007 lb/MMBtu; or SOx (as SO2) - 0.0019 lb/MMBtu. [District Rules 2201, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
8. Source testing to measure NOx and CO emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
9. During the 36-month source testing interval, the owner/operator shall have unit tuned at least twice each calendar year, from four to eight months apart, in which it operates, by a technician that is qualified, to the satisfaction of the APCO, in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rule 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
10. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

11. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
12. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
13. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
14. The source plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
15. For emissions source testing, the arithmetic average of three 30-consecutive-minute (or longer periods as necessary) test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
16. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
18. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. Testing to demonstrate compliance with the short-term (daily) fuel sulfur content limit shall be conducted monthly. If a monthly test indicates that a violation of the daily fuel sulfur content limit has occurred then weekly testing shall commence and continue until eight consecutive tests show compliance. Once compliance with the daily fuel sulfur content is demonstrated on eight consecutive weekly tests, testing may return to the monthly schedule. If the unit is not operated during an entire calendar month, fuel sulfur content testing shall not be required for that specific month. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Compliance with the rolling 12-month average fuel sulfur content limit shall be demonstrated monthly. The 12-month rolling average fuel sulfur content shall be calculated as follows: 12-month rolling average fuel sulfur content = Sum of the monthly average fuel sulfur contents for the previous 12 months divided by the total number of months the unit has operated in during the previous 12 months. The monthly average fuel sulfur content is the average fuel sulfur content of all tests conducted in a given month. If the unit is not operated during an entire calendar month, fuel sulfur content testing shall not be required for that specific month. Owner/operator shall keep a monthly record of the rolling 12-month average fuel sulfur content. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
21. Fuel sulfur content shall be monitored using one of the following methods: ASTM Methods D1072, D3246, D4084, D4468, D4810, D5504, D6228, D6667 or Gas Processors Association Standard 2377. [District Rule 2201] Federally Enforceable Through Title V Permit
22. The minimum flue gas recirculation rate shall be established by source testing the unit per Rules 4305, 4306, and 4320 at three firing rates (low, mid, and high). The normal range shall be no lower than the minimum flue gas recirculation rate that complies with the NOx and CO emission limits as demonstrated through source testing at a similar fire rate. The source test emission measurements shall be made with the unit operating at conditions representative of normal operations. No measurements shall be made within the first two hours after a continuous period in which fuel flow to the unit is shut off 30 minutes or longer, or within 30 minutes after a re-ignition as defined in District Rule 4306. A flow transmitter shall be calibrated prior to the source test. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

23. The normal flue gas recirculation rate or level shall be re-established during each source test required by the permit. The flow transmitter shall be calibrated prior to each source test. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

24. Permittee shall continuously monitor and record the flue gas recirculation rate using a flow transmitter and the plant's CEM DAHS during period when this boiler is in use. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

25. If the flue gas recirculation rate is less than the normal range during periods of normal operation, permittee shall return the flue gas recirculation rate to the normal range as soon as possible, but no later than 1 hour of operation after detection. If the flue gas recirculation rate is not returned to the normal range or level within 1 hour of operation after detection, permittee shall notify the District within the following 1 hour and shall conduct a source test within 60 days of the first exceedance, to demonstrate compliance with the auxiliary boiler emission limits at the new flue gas recirculation rate. A district-approved portable analyzer may be used in lieu of a source test to demonstrate compliance. In lieu of conducting a source test, permittee may stipulate that a violation has occurred and may be subject to enforcement action. Permittee shall correct the violation, demonstrate compliance has been re-established, and resume monitoring. If the deviations are the result of a qualifying breakdown condition pursuant to District Rule 1100, permittee may fully comply with District Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

26. Pursuant to Rule 4320, beginning January 1, 2025 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in the December 17, 2020 version of Rule 4320. [District Rule 4320]

27. Permittee shall keep records of the normal flue gas recirculation rate range established during source testing, the date and time of flue gas recirculation rate monitoring, and the measured flue gas recirculation rate and the firing rate at the time of the monitoring event. The records shall include a description of any corrective action taken to maintain the flue gas recirculation rate within the normal range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

28. The exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NOx, CO, and O2 analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Source Emission Monitoring and Testing. [District Rule 1081] Federally Enforceable Through Title V Permit

29. Owner/operator shall maintain daily records of the type and quantity of fuel combusted by the boiler. [District Rule 2201 and 40 CFR 60.48 (c)(g)] Federally Enforceable Through Title V Permit

30. Owner/operator shall keep a record of the cumulative annual quantity of hours operated for this unit. The record shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit

31. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-4597-6-2 **EXPIRATION DATE:** 06/30/2024

EQUIPMENT DESCRIPTION:
235 BHP CUMMINS MODEL CFP7E-50 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY IC ENGINE POWERING A FIREWATER PUMP

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102]
3. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702 and 40 CFR 60 Subpart IIII] Federally Enforceable Through Title V Permit
4. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [40 CFR 60 Subpart IIII] Federally Enforceable Through Title V Permit
5. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, 17 CCR 93115, and 40 CFR 60 Subpart IIII] Federally Enforceable Through Title V Permit
6. Emissions from this IC engine shall not exceed any of the following limits: 2.475 g-NOx/bhp-hr, 1.193 g-CO/bhp-hr, or 0.062 g-VOC/bhp-hr. [District Rule 2201, 17 CCR 93115, and 40 CFR 60 Subpart IIII] Federally Enforceable Through Title V Permit
7. Emissions from this IC engine shall not exceed 0.111 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102, 17 CCR 93115, and 40 CFR 60 Subpart IIII] Federally Enforceable Through Title V Permit
8. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems". Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rule 4702, 17 CCR 93115, and 40 CFR 60 Subpart IIII] Federally Enforceable Through Title V Permit
9. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
10. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

11. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702, 17 CCR 93115, and 40 CFR 60 Subpart IIII] Federally Enforceable Through Title V Permit

Appendix C

Contingency Plan for Unplanned Facility Closure
Compliance-12

MRP San Joaquin Energy, LLC

On Site Contingency Plan for Unplanned Temporary and Permanent Closures

MRP San Joaquin Energy, LLC. - Combined Cycle Power Plant.

14950 West Schulte Road
Tracy, CA 95377

Table of Contents

List of Tables

List of Figures

List of Attachments

1.0 Introduction

This On-Site Contingency Plan was prepared to support the Application for Certification submitted to the California Energy Commission (CEC) (CEC Docket No. 08-AFC-7) for the GWF Tracy Combined Cycle Power Plant (GWF Tracy) project. The plan fulfills the requirements for Conditions of Certification (COCs) Compliance-12 and Compliance-13 for managing unplanned temporary and unplanned permanent closures. The On-Site Contingency Plan will help to ensure that all necessary steps to mitigate public health and safety impacts and environmental impacts are taken in a timely manner during unexpected plant closures. The plan covers written procedures concerning site security, hazardous materials and waste removal, and insurance and warranty coverage. The plan was revised to reflect new ownership by MRP San Joaquin Energy, LLC, new insurance and other minor changes to the facility.

2.0 Responsibilities

Plant Owner - The Plant Owner has the overall responsibility for ensuring all provisions of this plan are administered and adhered to.

Plant Manager - The Plant Manager is responsible for overseeing the program, and notification to the CEC.

3.0 Contingency Plan

3.1 Notification Procedures

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

If it is determined that a temporary closure is likely to be permanent, or for a duration of more than twelve months, a closure plan consistent with CEC requirements for a planned closure shall be developed and submitted to the CPM within 90 days of such determination (or other period of time mutually agreed to by the owner and the CPM).

Table 1. Agencies to Notify

California Energy Commission	
Craig Hoffman Compliance Project Manager California Energy Commission 1516 9th St., MS 2000 Sacramento, CA 95814-5512	Tel: 916-654-4781 Fax: 916-654-3882 e-mail: Anwar.ali@energy.ca.gov
County of San Joaquin Office of Emergency Services	
Michael R. Cockrell Director of Emergency Operations 2101 E. Earhart Ave., Suite 300 Stockton, CA 95206	Tel: 209-953-6200 Fax: 209-953-6268 e-mail: sjcoes@sjgov.org
City of Tracy Fire Department	
Fire Department Administration 835 Central Avenue Tracy, CA 95376	Tel: (209) 831-6700 Fax: (209) 831-6703 e-mail: firedept@ci.tracy.ca.us
San Joaquin County Environmental Health Department	
Dennis Fields 1868 E. Hazelton Ave. Stockton, CA 95205	Tel: 209- 468-3420 Fax: (209) 944-9015 e-mail: hsaeed@co.san-joaquin.ca.us
Central Valley Regional Water Quality Control Board	
Greg Vaughn 11020 Sun Center Drive, Suite 200 Rancho Cordova, CA 95670-6114	Tel: 916 -464-3291 Fax: 916- 464-4645 e-mail: VaughnG@rb5s.swrcb.ca.gov
Byron-Bethany Irrigation District	
Rick Gilmore General Manager 7995 Bruns Road Byron, CA 94514	Tel: (209)835-0375 ext. 12 Fax: (209)835-2869 e-mail: r.gilmore@bbid.org
San Joaquin Valley Air Pollution Control District	
Rupi Gill Northern Region Office 4800 Enterprise Way Modesto, CA 95356	Tel: (209) 557-6400 Fax: (209) 557-6475 e-mail: rupi.gill@valleyair.org
PG&E	
Michael Steele Account Executive, Generation Specialist Energy Solutions & Service 4040 West Lane, Stockton, Ca 95204	Tel: (209) 825-6985 e-mail: mfs4@pge.com
CAISO	
Ronni Reese Senior Contracts Analyst 250 Outcropping Way Folsom, CA 95630	Tel: (916) 608-7027 Fax: (916) 608-7279 e-mail: RReese@caiso.com
USEPA Region 9	
Laura Yannayon US EPA Region IX 75 Hawthorne Street San Francisco, CA 94105-3901	Tel: 415-972-3534 e-mail: yannayon.laura@epa.gov

3.2 Plant Shut down Procedure

In the event of a plant closure, personnel will shut down all operating equipment that is not necessary to respond to an emergency, in accordance with plant operating procedures. In the event of an emergency shutdown (e.g., fire, earthquake, sabotage, etc.), MRP San Joaquin Energy, LLC Tracy Combined Cycle Power Plant (SJE) personnel should consult the SJE Emergency Action Plan (EAP). The purpose of the EAP is to provide emergency response guidelines so that SJE operations and management personnel can adequately evaluate the situation and respond in the interests of protecting personnel, company resources, and the environment.

The EAP provides guidelines for emergencies, including accidental release of toxic gases, chemical spills, fires, explosions, bomb threats, civil disobedience, and personnel injuries. There are several situations that may require emergency response by site personnel. The response required for each situation may vary, and each requires a separate course of action. Personnel should reference the EAP for proper response.

3.3 Site Security and Emergency Response

In the event of an unexpected closure, SJE will follow all procedures in the Operations Site Security Plan (COC HAZ-7) and the Emergency Action Plan (COC Worker Safety 2). A Plant Operator is on site 24 hours per day and will direct emergency vehicles through the facility gate if necessary.

3.4 Hazardous Material and Waste Removal

Handling and disposal of all hazardous materials and wastes shall be in accordance with all applicable laws, ordinances, regulations, and standards. The table in Attachment 1 identifies all hazardous materials in reportable quantities that are located at SJE. In the event of an unexpected temporary closure, not all hazardous materials will require removal. If such an event occurs, SJE will conduct visual inspections of all hazardous material storage vessels on a daily basis to assess container condition. SJE has implemented a HMBP to assist with identification and handling of all hazardous materials.

Whenever practical, hazardous materials will be returned to the vendor or transferred to a certified disposal facility. Qualified transporters will be used if it is deemed necessary to remove any hazardous material(s).

If the unexpected temporary closure also results in a release of hazardous materials or waste, plant personnel will consult the Emergency Action Plan, HMBP, and/or Risk Management Plan. These plans address accidental release prevention and emergency policies, a hazardous materials inventory, employee training, location of safety equipment, main utility shutoffs, notification methods, and accident investigation procedures. In addition, the Storm Water Pollution Prevention Plan (SWPP) and the Spill Prevention Control and Countermeasure Plan (SPCC) describe the necessary actions in the event of a spill that might threaten off site locations. Both structural and non-structural Best Management Practices (BMPs) are utilized at the site to reduce pollutants in storm water discharge. Structural BMPs include such measures as valves, berms, curbs, and containment structures that are used to hold or divert storm water. Non-structural

BMPs include such measures as regular inspections; good housekeeping practices; employee training; and special procedures for storing/loading hazardous materials and wastes. Plant personnel shall consult all of these plans prior to proceeding with any hazardous material or waste removal.

4.0 Insurance and Warranty Coverage

SJE is insured under the insurance policies listed in Table 2 below.

Table 2. Insurance Policies

INSURANCE			
Insurance Type	**Vendor**	**Description**	**Date of Policy**
Property & Business Interruption			
	Factory Mutual Insurance Company (FM Global)	Real & Personal Property, Earth Movement, Flood, Expediting Expense, Machinery Breakdown & Time Element	04/07/2024 – 04/07/2025
General Liability			
	Federal Insurance Company (Chubb)	Premises & Operations	04/07/2024 – 04/07/2025
Business Automobile			
	Federal Insurance Company (Chubb)	Liability, Physical Damage & Hired Car Physical Damage	04/07/2024 – 04/07/2025
Umbrella Liability			
	Federal Insurance Company (Chubb)	Bodily Injury, Property Damage, Personal Injury	04/07/2024 – 04/07/2025
Excess Liability			
	The Ohio Casualty Insurance Company (Liberty Mutual)	Bodily Injury, Property Damage, Personal Injury	04/07/2024 – 04/07/2025

Pollution Legal Liability			
	Allianz Underwriters Insurance Company	On-site cleanup costs, off-site cleanup costs, Third party bodily injury and property damage, and, Emergency Response Costs	05/20/2022 - 05/20/2025

5.0 Unexpected Temporary Closure

In the event the facility is closed temporarily and there are additional tasks to be performed or notifications beyond those items addressed in this plan, SJE will coordinate to ensure proper notification of other impacted parties are notified such as project neighbors and local governments.

5.1 Biological Resources

In the case of temporary closure, measures to protect biological resources would be needed only if there were a potential to disturb the ground surfaces or release harmful materials. If such an event occurs, SJE will consult with responsible agencies to plan clean up and mitigation of impacts to biological resources.

6.0 Permanent Closure

In the event the facility is closed permanently, there are additional tasks that need to be performed, including preparing a facility closure plan, notifying agencies, ensuring site security, removing hazardous materials and waste.

6.1 Facility Closure Plan

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

1. Identify and discuss any impacts and mitigation to address significant adverse impacts associated with proposed closure activities and to address facilities, equipment or other project related remnants that will remain at the site;

2. Identify a schedule of activities for closure of the power plant site, transmission line corridor, and all other appurtenant facilities constructed as part of the project;

3. Identify any facilities or equipment intended to remain on site after closure, the reason, and any future use; and

4. Address conformance of the plan with all applicable laws, ordinances, regulations, standards, and local/regional plans in existence at the time of facility closure and applicable Conditions of Certification.

In the event of an unplanned permanent closure, the plan will be submitted to the CPM within 90 days following the CPM's determination that an unplanned temporary closure is likely to be permanent.

6.2 Agency Notification

Additional notification may be necessary in the event of a permanent closure, including re-notifying each of the agencies listed in Table 1. The Closure Plan will also be sent to those appropriate agencies with which SJE has a current permit.

6.3 Site Security

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

6.4 Removal of Hazardous Materials and Waste

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

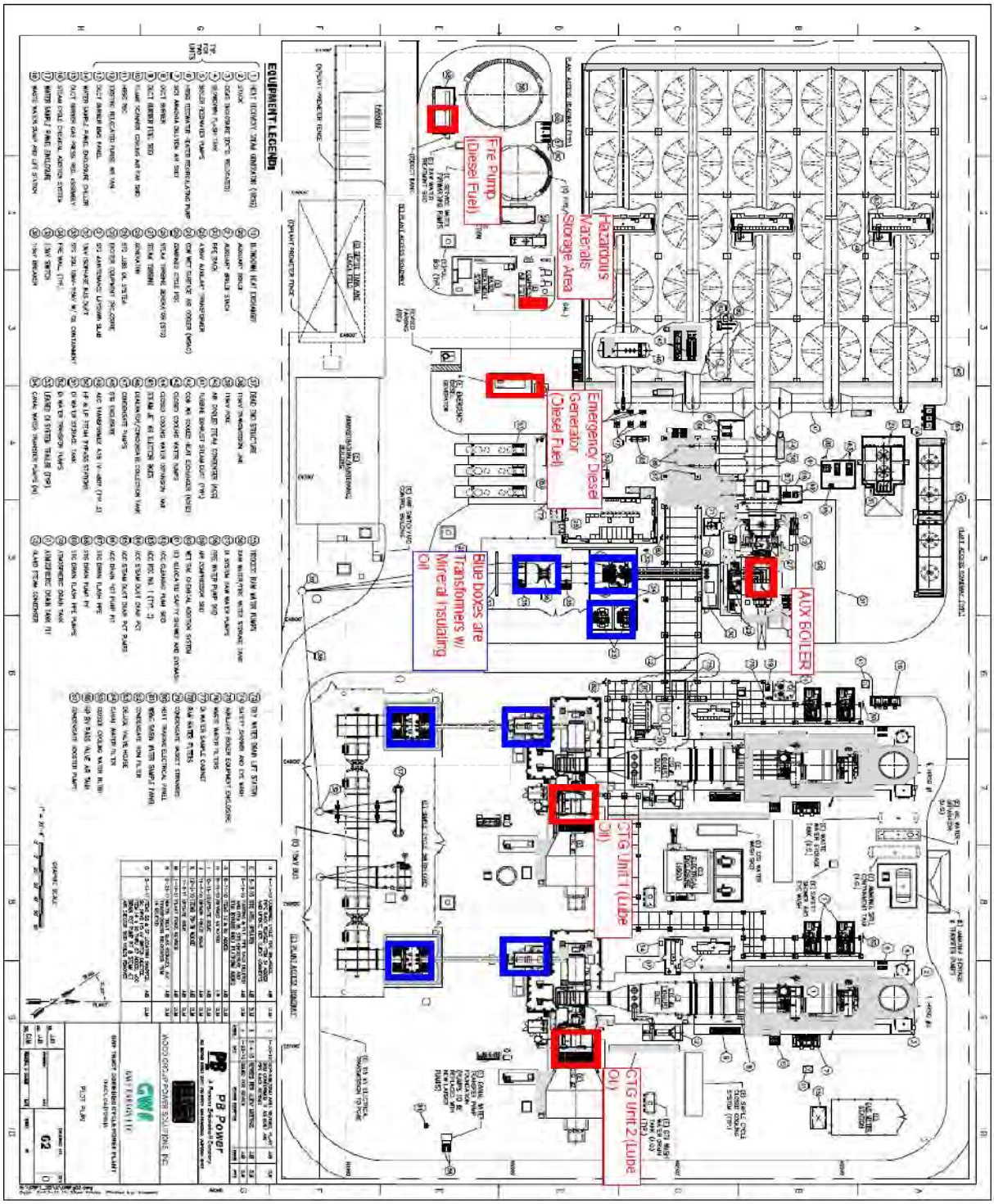
6.5 Biological, Cultural and Paleontological Resources

When a permanent Closure Plan is prepared, it will include the take avoidance and mitigation requirements in effect at the time for the species that would be impacted. The plan may also include reclamation of areas where facilities would be removed. This may include ripping of soil, contouring of disturbed areas, implementation of erosion control, revegetation, and other measures deemed appropriate at the time the Closure Plan is developed.

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

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

Figure 1: Map of Hazardous Materials and Petroleum Products at Tracy Combined Cycle Power Plant


Fire Pump (Diesel Fuel)
Hazardous Materials Storage Area
Emergency Diesel Generator (Diesel Fuel)
Blue boxes are Transformers w/ Mineral Insulating Oil
AUX BOILER
CTG Unit 1 (Lube Oil)
CTG Unit 2 (Lube Oil)

Attachment 1: List of Hazardous Materials and Petroleum Products at Tracy Combined Cycle Power Plant

Significant Material	Location	Secondary Containment	Maximum Daily Amounts	Application
Aqueous Ammonia	ammonia storage tank.	Concrete secondary containment surrounding the tank and equipment and underground spill containment tank.	9,000 gallons	CTG NOx control
Aqueous Ammonia	Boiler Chemistry tote feeding area	Concrete secondary containment	990 gallons	Boiler chemistry control.
Lubrication Oil	Oil reservoir tanks on Boiler Feed water pump #1 skid serving HRSG on CTG unit #1.	Steel skid with containment lip.	185 gallons	Lubricate rotating pump bearings and other rotating pump parts.
Lubrication Oil tank under	Oil reservoir tanks on Boiler Feed water pump #1 skid serving HRSG on CTG unit #1.	Steel skid with	185 gallons	Lubricate rotating pump bearings and other rotating pump parts.
Lubrication Oil tank under	Oil reservoir tanks on Boiler Feed water pump #2 skid serving HRSG on CTG unit #2.	containment lip.	185 gallons	Lubricate rotating pump bearings and other rotating pump parts.
Lubrication Oil tank under	Oil reservoir tanks on Boiler Feed water pump #1 skid serving HRSG on CTG unit #1.	Steel skid with containment lip.	185 gallons	Lubricate rotating pump bearings and other rotating pump parts.
Lubrication Oil tank under	belly tank under CTG Unit#1	system in metal enclosure with bermed perimeter.	3,300 gallons	Lubricate rotating equipment (e.g., gas turbine turbine bearings)
Lubrication Oil tank under	belly tank under CTG Unit#2	system in metal enclosure with bermed perimeter.	3,300 gallons	Lubricate rotating equipment (e.g., gas turbine bearings)
Lubrication Oil tank under	tank under STG	system in metal enclosure with bermed perimeter.	4,750 gallons	Lubricate rotating equipment (e.g., steam turbine bearings)
Diesel Fuel #2	Located in fire pump shed	Fire pump: Double-walled tank	500 gallons	fuel to power fire pump
Diesel Fuel #2	Located in and the belly tank of the emergency diesel generator	Generator: Single-walled steel tank within a formed concrete structure with a concrete pad	400 gallons	Fuel to power emergency diesel generator
Biocide Sodium hypochlorite (10%), sodium bromide(85%), sodium hydroxide(5%)	Closed loop cooling water system Porta feed staging area	Porta Feed Secondary containment	110 gallons	Biocide for closed loop cooling water system serving STG
TRAC 108 Sodium Nitrate	Closed loop cooling water system Porta feed staging area	Secondary containment for reservoir, pump and pipes	110 gallons	Corrosion inhibitor for closed loop cooling water system serving STG
Dilute Propylene Glycol (Antifreeze)	Closed loop water cooling system serving CTG #1	Secondary containment for reservoir, pump and pipes	751 gallons	To cool CTG #1 lubrication oil
Dilute Propylene Glycol (Antifreeze)	Closed loop water cooling system serving CTG #2	Secondary containment at circ pump skid, WSAC and Fin Fan AC	751 gallons	To cool CTG #2 lubrication oil

Significant Material	Location	Secondary Containment	Maximum Daily Amounts	Application
Calcium Hypochlorite	Water treatment shed	Secondary containment	100 pounds Solid material.	Water Treatment – Tablets diluted in water
ZOK (cleaning fluid)	Concentrated in water treatment shed	Secondary containment	110 gallons concentrated liquid in chemical storage shed.	Gas turbine compressor cleaning fluid
Transformer Oil/Mineral Insulating Oil – Diala Oil AXOil/Mineral	Switchyard south of CTG#1	Secondary containment	12,885 gallons	Cooling and electrical insulation in Electrical Transformer
Transformer Oil/Mineral Insulating Oil – Diala Oil AX	Switchyard south of CTG#2	Secondary containment	12,885 gallons	Cooling and electrical insulation in Electrical Transformer
Transformer Oil/Mineral Insulating Oil – Diala Oil AX	Area between HRSG #1 and HRSG #2	Secondary containment	572 gallons	Cooling and electrical insulation in Electrical Transformer
Transformer Oil/Mineral Insulating Oil – Diala Oil AX	Area between HRSG #1 and HRSG #2	Secondary containment	572 gallons	Cooling and electrical insulation in Electrical Transformer
Transformer Oil/Mineral Insulating Oil – Diala Oil AX	South of STG	Secondary containment	9,847 gallons	Cooling and electrical insulation in Electrical Transformer
Transformer Oil/Mineral Insulating Oil – Diala Oil AX	Southeast of STG	Secondary containment	1,139 gallons	Cooling and electrical insulation in Electrical Transformer
Used Oil	Water treatment shed.	Drums are stored on self-contained pallets for transport to other locations.	100 gallons	Waste
Waste Oil and Oily Debris	Water treatment shed	Drums are stored on self-contained pallets for transport to other locations.	500 pounds	Waste
Coagulant	Water Treatment Area	Secondary containment	110 gallons	Coagulant for clarifier
Flocculent	Water Treatment Area	Secondary containment	110 gallons	Flocculent for Clarifier
Argon, Compressed	CEMS Shack Unit 1	Secondary containment	250 Pounds	Welding gas
Oxygen, Compressed	CEMS Shack Unit 1	Secondary containment	250 Pounds	Welding Gas
Calcium hypochlorite	Potable water Treatment Skid	Secondary containment for reservoir, pump and pipes	100 Pounds	Biocide for potable Water System
Oxalic Acid, Dihydrate 99.6%	Hazardous Materials Storage Area	Secondary containment	400 pounds	Chemical cleaning of Ultrafiltration unit membranes
Monoethanolamine	Boiler Chemistry tote feeding area	Secondary containment for reservoir, pump and pipes	990 gallons	Control of Steam Boiler chemistry

Appendix D

Complaints, Notices of Violation, Official Warnings, and Citations

Two Breakdowns/Deviations occurred between January 1st and December 31st, 2024.

MRP San Joaquin Energy

January 25, 2024

Ms. Mary Baires
San Joaquin Valley Unified APCD
4800 Enterprise Way.
Modesto, 95356-8718

Subject: **Title V Deviation/Breakdown Follow-up Report**
MRP San Joaquin Energy, LLC – Tracy Combined Cycle Power Plant
Facility ID N-4597

Dear Ms. Baires,

In accordance with Condition 2 of the Facility Wide Requirements of the Title V Permit for Facility ID N-4597, please find enclosed the Title V Breakdown/Deviation Follow-up Report. The deviation/breakdown was initially reported on January 16, 2024.

Please call JT Shea at (209) 275-7079 or e-mail Jshea@mrpgenco.com if you require additional information or if you have any questions regarding this report.

Respectfully,

Claude Couvillion
Senior Vice President of Operation & Development
MPR San Joaquin Energy, LLC

14950 SCHULTE RD., TRACY, CALIFRONIA 95377 · TEL. (209) 221-8729 · FAX (209) 221-8751

BREAKDOWN / TITLE V - DEVIATION REPORTING FORM

Check the appropriate box if using this form to submit/report a:

☐ Breakdown Notification (must be reported within 1 hour)

☐ Title V Deviation

☒ Breakdown Follow-up Report

☐ Title V Deviation/Breakdown Follow-up Report

This form can be used to file the initial report of an equipment breakdown, and as the follow-up report for both a breakdown and/or deviation from a Federal Title V permit condition. The required reports must be submitted to the nearest District regional office as follows:

- Breakdown follow-up reports no later than 10 days after returning to compliance
- Deviation reports no later than 10 days after discovery

Company Name: MRP San Joaquin Energy - Tracy Combined Cycle Facility ID: **N-4597**

Breakdown - Initial Notification:

Reported by: Jeff Richardson Date: 1/16/24

Reported to: SJVAPCD Deviation/Breakdown Phone Line Time: 16:20

BREAKDOWN / DEVIATION INFORMATION

1.	Permit unit and condition number(s): N-4597-0-4 Condition #5, N-4597-5-2 Conditions #24
2.	Equipment involved: Auxiliary boiler flue gas recirculation rate monitor
3.	Location of operation: 14950 W Shulte Rd, Tracy CA 95377
4.	Description of permit condition: N-4597-0-4 Condition #5: The permittee must comply with all conditions of the permit including permit revisions originated by the District... N-4597-5-2 Condition #24: Permittee shall continuously monitor and record the flue gas recirculation rate using a flow transmitter and the plant's CEM DAHS…
5.	Date, time, and duration of breakdown/deviation: 1/16/2024 14:53 – 1/16/24 15:24 two hours of flue gas recirculation rate were not recorded (attachment A)

6.	Description of breakdown/deviation (include excess and visible emissions, if applicable): On 1/16/24 Aqua Sierra Controls, Inc. completed an annual auxiliary boiler flue gas recirculation flow meter calibration. Later that day, at 14:53, operators started the unit for a test run to ensure proper functionality prior to any dispatch. Once running, the operators noted that the flue gas recirculation (FGR) flow rate was not recording in the CEMS DAHS as required by N-4597-5-2 condition #24. During normal operation, the flue gas recirculation does not begin until the unit is past a specific load percentage. Flue gas recirculation typically begins after approximately 7 minutes of unit operation. Upon noticing that CEMS wasn't displaying the FGR flowrate data operators shut the unit down to troubleshoot the issue at 15:25 considering that a mechanical failure may be occurring.
7.	Date and time when breakdown/deviation was discovered: The breakdown was discovered on 1/16/24 at 15:25
8.	Date and time compliance was achieved: Compliance was achieved on 1/16/25 at 15:25 when operators shut the auxiliary boiler off.
9.	Probable cause of breakdown/deviation: After shutting down the auxiliary boiler the facility immediately began trouble shooting the monitoring system and emissions controls. Technicians discovered that the FGR rate monitor had been damaged by one of the contractors earlier that day during meter calibration. The system was recirculating flue gas but the facility could not monitor flue gas flow rate due to the damaged FGR rate monitor.
10.	Measures taken to correct this occurrence and prevent recurrence: The facility has ceased operation of the auxiliary boiler until the FGR rate monitor can be replaced. This breakdown was discovered during operational test run procedures that the facility follows as a best practice after contractors have adjusted, replaced, or repaired equipment to ensure systems are working properly. The facility believes that these steps were proactive in determining the equipment breakdown and assisted the facility to prevent future occurrence due to the necessity of a professional contractor completing the required work.
	• Attach photographs of defective equipment. • Provide any additional information necessary to establish that this occurrence was the result of an unavoidable failure or malfunction; Rule 1100 – *Equipment Breakdown* assigns the burden of proof to the source owner/operator seeking relief.

CERTIFICATION:

I declare, under penalty of perjury under the laws of the state of California, that based on information and belief formed after reasonable inquiry, all information provided in this report is true, accurate, and addresses all deviations that resulted from this event:

Signature of Responsible Official *(Responsible Official only required for Title V Permit Holders)*	1/25/204 Date
Claude Couvillion Name of Responsible Official	312.766.8716 Telephone
Senior Vice President of Operations & Development Title of Responsible Official	Jcouvillion@mrpgenco.com Email

Tracy Combined Cycle Power Plant

Tracy, CA

Aux Boiler & Steam Turbine- Daily Operations

January 16, 2024

	Aux Boiler						Steam Turbine	
Hour	O2%	Gas Flow kscf	Heat Input mmBtu	Recirc Flow lbs	Master Demand %	Boiler On-Time	Megawatt Hours	STG On-Time
00	4.97	3.0	3.2	1705.6	20.41	0.25	168	1.00
01	**Down**	**Down**	**Down**	**Down**	17.00	0.00	168	1.00
02	**Down**	**Down**	**Down**	**Down**	17.00	0.00	168	1.00
03	**Down**	**Down**	**Down**	**Down**	17.00	0.00	168	1.00
04	**Down**	**Down**	**Down**	**Down**	17.00	0.00	168	1.00
05	**Down**	**Down**	**Down**	**Down**	17.00	0.00	168	1.00
06	**Down**	**Down**	**Down**	**Down**	17.00	0.00	168	1.00
07	5.21	6.7	7.0	3232.0	23.21	0.63	168	1.00
08	5.00	3.3	3.5	1844.5	20.27	0.30	168	1.00
09	**Down**	**Down**	**Down**	**Down**	17.00	0.00	168	1.00
10	**Down**	**Down**	**Down**	**Down**	17.00	0.00	168	1.00
11	**Down**	**Down**	**Down**	**Down**	17.00	0.00	168	1.00
12	**Down**	**Down**	**Down**	**Down**	17.00	0.00	168	1.00
13	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	0.00	167	1.00
14	6.96	1.1	1.1	**Down**	17.69	0.12	167	1.00
15	5.00	4.6	4.8	**Down**	21.41	0.42	167	1.00
16	**Down**	**Down**	**Down**	**Down**	17.00	0.00	167	1.00
17	**Down**	**Down**	**Down**	**Down**	17.00	0.00	167	1.00
18	**Down**	**Down**	**Down**	**Down**	17.00	0.00	167	1.00
19	**Down**	**Down**	**Down**	**Down**	17.00	0.00	167	1.00
20	**Down**	**Down**	**Down**	**Down**	17.00	0.00	167	1.00
21	**Down**	**Down**	**Down**	**Down**	17.00	0.00	167	1.00
22	**Down**	**Down**	**Down**	**Down**	17.00	0.00	167	1.00
23	**Down**	**Down**	**Down**	**Down**	17.00	0.00	121	1.00
Average	5.4	3.7	3.9	2260.7	17.8		166	
Total		18.7	19.6	6782.1		1.7	3975	24.0

MRP San Joaquin Energy

August 20, 2024

Ms. Mary Baires
San Joaquin Valley Unified APCD
4800 Enterprise Way.
Modesto, 95356-8718

Subject: Title V Deviation/Breakdown Follow-up Report
MRP San Joaquin Energy, LLC – Tracy Combined Cycle Power Plant
Facility ID N-4597

Dear Ms. Baires,

In accordance with Condition 2 of the Facility Wide Requirements of the Title V Permit for Facility ID N-4597, please find enclosed the Title V Breakdown/Deviation Follow-up Report. The deviation/breakdown was initially reported on August 10, 2024, and an excess emissions report was submitted August 13, 2024.

Please call JT Shea at (209) 275-7079 or e-mail Jshea@mrpgenco.com if you require additional information or if you have any questions regarding this report.

Respectfully,

Claude Couvillion
Senior Vice President of Operation & Development
MPR San Joaquin Energy, LLC

14950 SCHULTE RD., TRACY, CALIFRONIA 95377 · TEL. (209) 221-8729 · FAX (209) 221-8751

San Joaquin Valley AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

BREAKDOWN / TITLE V - DEVIATION REPORTING FORM

Check the appropriate box if using this form to submit/report a:

☐ Breakdown Notification (must be reported within 1 hour)

☐ Title V Deviation

☐ Breakdown Follow-up Report

☒ Title V Deviation/Breakdown Follow-up Report

This form can be used to file the initial report of an equipment breakdown, and as the follow-up report for both a breakdown and/or deviation from a Federal Title V permit condition. The required reports must be submitted to the nearest District regional office as follows:

- Breakdown follow-up reports no later than 10 days after returning to compliance
- Deviation reports no later than 10 days after discovery

Company Name: MRP San Joaquin Energy - Tracy Combined Cycle Facility ID: **N-4597**

Breakdown - Initial Notification:

Reported by: Shawn Reed Date: 8/10/2024

Reported to: SJVAPCD Deviation/Breakdown Phone Line Time: 7:19 PM PST

BREAKDOWN / DEVIATION INFORMATION

1.	Permit unit and condition number(s): N-4597-2-11 Conditions #11 and N-4597-0-4 Condition #5
2.	Equipment involved: Natural Gas-Fired Dry Low NOx Combustor on the Unit 2 Combustion Turbine Generator
3.	Location of operation: 14950 W Shulte Rd, Tracy CA 95377
4.	Description of permit condition: N-4597-2-11 Condition #11: “Emission rates from this CTG without the duct burner firing, except during startup and shutdown periods, shall not exceed any of the following limits: NOx (as NO2) – 8.10 lb/hr and 2.0 ppmvd @ 15%;…” N-4597-0-4 Condition #5: “The permittee must comply with all conditions of the permit including permit revisions originated by the District...”
5.	Date, time, and duration of breakdown/deviation: 8/10/24 5:00 PM CEMS time– 8/10/24 05:59 PM. One hour of excess NOx Emissions was recorded.

6. Description of breakdown/deviation (include excess and visible emissions, if applicable):

Unit 2 began startup on 8/10/24 at 2:07 PM CEMS time and began operating as expected within permitted emission limits through startup and an online calibration error test. At 5:34 PM CEMS time the unit unexpectedly switched from “peak fire, normal premix steady state” into “peak fire, extended lean-lean” firing mode. The facility operators are aware that the unit is not capable of operating within permitted NOx emission limits at “peak fire, extended lean-lean” operating mode. Once operators identified the operating change, the unit was immediately shut down at 5:37 PM CEMS time.

The unit had been operating within permitted emission limits prior to the unexpected change in operating modes, but while the operators were determining the unexpected change in operation, “peak fire, extended lean-lean” firing mode caused two minutes of elevated NOx emissions from 5:34 - 5:35 PM CEMS time. A shutdown was initiated at 5:36 PM CEMS time to avoid further excess emissions and to diagnose the operations malfunction. See emissions data in Attachment A.

7. Date and time when breakdown/deviation was discovered:
The breakdown was discovered on 8/10/24 at 05:34 PM CEMS time

8. Date and time compliance was achieved:
Compliance was achieved on 8/10/24 at 05:50 PM CEMS time after the unit shut down. The excess emissions event ended at 06:00 PM CEMS time after the excess emissions CEMS hour had passed. Attachment B.

9. Probable cause of breakdown/deviation:
Upon shutdown the facility dispatched a technician to inspect the unit and CEMS analyzers to determine a root cause but found no indication of broken equipment or malfunctioning analyzers. The unit was restarted at 7:46 PM CEMS time and ran without issue. The facility hired a 3rd party engineering company, PSM, to conduct an in-depth analysis of the incident. PSM determined that the potential root cause was either an intermittent mechanical issue within the Dry Low NOx (DLN) combustor or due to a natural gas quality anomaly from PG&E but that the incident was not likely to happen again.

10. Measures taken to correct this occurrence and prevent recurrence:
Considering the staff review and 3rd party analysis the facility has implemented several actions as a result of this incident. The facility is working to connect dynamics sensors to a live monitoring program so that these issues can be diagnosed in real time should they occur again. Additionally, onsite technicians created an alarm response to the unit switching into “peak fire, extended lean-lean” firing mode when the unit should be in normal operation so that operators will be made aware of changes in operation immediately and can address the change quickly and avoid emissions excursions. Finally, the facility scheduled a borescope inspection of unit 2 to determine whether any damage or mechanical issues are present within the DLN combustor. In the meantime, PSM (third party engineering firm) indicated that the issue should not resurface and that the unit is clear to operate normally.

- Attach photographs of defective equipment.
- Provide any additional information necessary to establish that this occurrence was the result of an unavoidable failure or malfunction; Rule 1100 – *Equipment Breakdown* assigns the burden of proof to the source owner/operator seeking relief.

Northern Region Office
(*Merced, San Joaquin, & Stanislaus Counties*)
4800 Enterprise Way
Modesto, CA 95356-8718
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(*Fresno, Kings, & Madera Counties*)
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Southern Region Office
(*Tulare County & Valley portion of Kern County*)
34946 Flyover Court
Bakersfield, CA 93308-9725
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www.valleyair.org www.healthairliving.com

CERTIFICATION:

I declare, under penalty of perjury under the laws of the state of California, that based on information and belief formed after reasonable inquiry, all information provided in this report is true, accurate, and addresses all deviations that resulted from this event:

Signature of Responsible Official *(Responsible Official only required for Title V Permit Holders)*	08/20/2024 Date
Claude Couvillion Name of Responsible Official	312.766.8716 Telephone
Senior Vice President of Operations & Development Title of Responsible Official	Jcouvillion@mrpgenco.com Email

Attachment A

Tracy Combined Cycle Power Plant

Tracy, CA

Turbine 2- Hourly Emissions Report

August 10, 2024 - Hour 17

Emission Limits

1-Hour	*3-Hour Rolling*	*24-Hour Rolling*
NOx ppm @15% O2 - 2	CO ppm @15% O2 - 2	NH3 Slip ppm @15% O2 - 5
NOx lbs - 9.46	CO lbs - 6	NH3 Slip lbs - 9.4

Minute	O2%	NOx ppm	NOx ppm @15% O2	NOx lb/hr	CO ppm	CO ppm @15% O2	CO lb/hr	NH3 Slip ppm	NH3 Slip ppm @15% O2	NH3 Slip lb/hr	Inlet O2%	Inlet NOx ppm	Inlet NOx ppm @15% O2	Process Status
00	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	Normal
01	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	Normal
02	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	Normal
03	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	Normal
04	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	**Cal**	Normal
05	14.55	1.24	1.15	4.23	0.20	0.19	0.40	1.87	1.7	2.01	14.25	8.86	7.86	Normal
06	14.55	1.28	1.19	4.42	0.19	0.18	0.40	1.43	1.3	2.01	14.25	9.13	8.10	Normal
07	14.53	1.45	1.34	4.90	0.17	0.16	0.40	1.54	1.4	2.00	14.21	10.05	8.86	Normal
08	14.54	1.60	1.48	5.47	0.14	0.13	0.30	2.09	1.9	2.98	14.19	10.23	9.00	Normal
09	14.54	1.61	1.49	5.41	0.14	0.13	0.30	2.09	1.9	2.96	14.20	10.35	9.11	Normal
10	14.56	1.56	1.45	5.17	0.14	0.13	0.30	1.65	1.5	1.95	14.22	10.35	9.14	Normal
11	14.60	1.50	1.40	5.11	0.13	0.12	0.30	1.21	1.1	1.97	14.28	10.17	9.06	Normal
12	14.58	1.50	1.40	5.11	0.12	0.11	0.30	0.77	0.7	1.01	14.25	10.15	9.01	Normal
13	14.59	1.48	1.38	5.08	0.14	0.13	0.29	0.77	0.7	1.00	14.27	9.45	8.41	Normal
14	14.59	1.46	1.37	4.97	0.17	0.16	0.39	0.88	0.8	1.00	14.32	8.63	7.74	Normal
15	14.64	1.23	1.16	4.29	0.24	0.23	0.50	0.00	0.0	0.00	14.30	8.08	7.22	Normal
16	14.58	1.27	1.19	4.38	0.21	0.20	0.40	0.00	0.0	0.00	14.30	8.31	7.43	Normal
17	14.60	1.41	1.32	4.90	0.22	0.21	0.50	0.00	0.0	0.00	14.32	8.16	7.32	Normal
18	14.59	1.56	1.46	5.41	0.24	0.22	0.50	0.00	0.0	0.00	14.29	8.27	7.38	Normal
19	14.58	1.63	1.52	5.60	0.23	0.21	0.50	0.11	0.1	0.00	14.29	8.36	7.46	Normal
20	14.61	1.68	1.58	5.85	0.23	0.22	0.50	0.44	0.4	1.01	14.34	8.22	7.39	Normal
21	14.62	1.68	1.58	5.79	0.21	0.20	0.40	0.22	0.2	0.00	14.31	8.42	7.54	Normal
22	14.62	1.67	1.57	5.78	0.24	0.23	0.50	0.33	0.3	0.00	14.30	8.36	7.47	Normal
23	14.58	1.67	1.56	5.68	0.22	0.21	0.50	0.22	0.2	0.00	14.29	8.48	7.57	Normal
24	14.57	1.66	1.55	5.68	0.21	0.20	0.40	0.00	0.0	0.00	14.26	8.51	7.56	Normal
25	14.55	1.71	1.59	5.76	0.21	0.20	0.39	0.33	0.3	0.00	14.25	8.56	7.59	Normal
26	14.55	1.73	1.61	5.87	0.22	0.20	0.50	0.44	0.4	0.99	14.27	8.45	7.52	Normal
27	14.54	1.74	1.61	5.89	0.21	0.19	0.40	0.44	0.4	1.00	14.25	8.55	7.59	Normal
28	14.56	1.76	1.64	6.02	0.22	0.20	0.50	0.66	0.6	1.00	14.28	8.54	7.61	Normal
29	14.58	1.77	1.65	6.24	0.22	0.21	0.51	1.32	1.2	2.05	14.31	8.52	7.63	Normal
30	14.58	1.77	1.65	6.82	0.19	0.18	0.44	3.08	2.8	4.48	14.37	8.49	7.67	Normal

Minute	O2%	NOx ppm	NOx ppm @15% O2	NOx lb/hr	CO ppm	CO ppm @15% O2	CO lb/hr	NH3 Slip ppm	NH3 Slip ppm @15% O2	NH3 Slip lb/hr	Inlet O2%	Inlet NOx ppm	Inlet NOx ppm @15% O2	Process Status
31	14.26	2.13	1.89	7.99	0.16	0.14	0.34	3.41	3.1	4.57	13.54	12.15	9.74	Normal
32	13.81	2.67	2.22	9.76	0.13	0.11	0.23	7.32	6.1	9.52	13.17	13.33	10.17	Normal
33	13.67	2.64	2.15	9.90	0.11	0.09	0.25	7.68	6.4	11.28	12.83	14.26	10.43	Normal
34	13.16	8.33	6.35	29.05	0.09	0.07	0.25	0.00	0.0	0.00	12.12	68.43	45.98	Normal
35	12.95	63.39	47.04	212.58	0.08	0.06	0.13	6.11	4.7	7.37	11.96	100.00	66.00	Normal
36	12.94	82.30	61.00	244.44	0.07	0.05	0.11	20.86	14.9	22.90	12.00	100.00	66.29	Shutdown
37	12.98	81.02	60.36	166.59	0.07	0.05	0.08	98.02	75.4	74.32	12.36	100.00	69.09	Shutdown
38	14.47	70.48	64.67	165.81	0.87	0.80	1.26	11.88	10.8	10.46	15.05	100.00	100.85	Shutdown
39	15.04	65.81	66.26	156.92	0.48	0.48	0.71	12.60	12.6	10.95	15.07	100.00	101.20	Shutdown
40	15.12	58.92	60.14	129.66	0.25	0.26	0.35	4.60	4.6	3.52	15.20	98.81	102.28	Shutdown
41	15.26	51.54	53.92	104.61	0.17	0.18	0.21	9.45	10.5	6.86	15.31	91.79	96.88	Shutdown
42	15.42	43.02	46.32	78.95	0.15	0.16	0.19	14.22	15.8	9.74	15.53	82.16	90.27	Shutdown
43	15.65	33.60	37.76	54.90	0.13	0.15	0.12	15.39	17.1	9.10	15.84	70.72	82.46	Shutdown
44	16.22	20.84	26.27	32.24	0.52	0.66	0.50	15.60	19.5	9.01	16.52	43.24	58.25	Shutdown
45	16.91	6.50	9.61	8.99	18.89	27.93	15.91	1.26	1.8	0.76	17.23	26.03	41.85	Shutdown
46	17.63	4.85	8.75	5.65	14.23	25.67	10.07	32.70	54.5	14.03	18.03	26.47	54.42	Shutdown
47	18.44	3.74	8.97	4.40	4.47	10.72	3.20	23.24	58.1	10.13	18.84	16.56	47.43	Shutdown
48	19.15	1.48	4.99	1.67	9.26	31.22	6.36	**Down**	**Down**	**Down**	19.27	10.31	37.32	Shutdown
49	19.21	0.56	1.96	0.31	7.44	25.97	2.53	**Down**	**Down**	**Down**	19.29	8.34	30.56	Shutdown
50	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	Down
51	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	Down
52	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	Down
53	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	Down
54	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	Down
55	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	Down
56	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	Down
57	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	Down
58	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	Down
59	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	**Down**	Down
Average	14.92	14.32	14.13	45.00	1.39	1.37	2.70	0.8	0.8	0.90	14.67	29.21	27.66	Shutdown
Total				37.35						0.72				
3-Hr Rlng						**NSD ***	**NSD ***							
24-Hr Rlng									0.2 *	0.30 *				

** - Value Excludes Startup and Shutdown Emissions*

Attachment B

Turbine 2 Excess Emissions Summary

Tracy Combined Cycle Power Plant

Excess Emissions for 8/10/2024: Normal Ops NOx ppm @15% O2 1-Hr

Reason	Duration
Unexpected Ext Ln-Ln	1 hour
Source operating time	9 hours
Duration of Normal Ops NOx ppm @15% O2 1-Hr excess emissions	1 hour
Source operating time with excess emissions	11.1%

Turbine 2 Excess Emissions

Tracy Combined Cycle Power Plant

Excess Emissions for 8/10/2024: Normal Ops NOx ppm @15% O2 1-Hr

Parameter	Start	End	Duration	Value	Min	Max	Limit	Reason	Action
Normal Ops NOx ppm @15% O2 1-Hr	8/10/2024 5:00 PM	5:59 PM	1 hour	3.5	3.5	3.5	2.0	Unexpected Ext Ln-Ln	Unit Shutdown
Total duration			1 hour						

Appendix E

Wet Surface Air Cooler PM10 Emissions
AQ-SC9

WET SURFACE AIR COOLER (WSAC)
PM10 ANNUAL CALCULATION

										TDS (ppm):	220	(Copy to Column K)
Start Date	9/1/2023									Design Drift Ratio:	0.001%	
End Date	9/1/2024									PM10 limit:	110	lb/yr
Combined Pump Hours in Year	1960.4									Sample date:	8/12/2024	

		WSAC		Hours Online WSAC		WSAC		output per pump			Recirc Rate	PM10
		PUMP A	gallons	PUMP B	gallons	PUMP C	gallons	gpm	TDS (ppm)	Total gallons per day	(lb/day)	lb/day
9/1/2023	9/2/2023	0.70	11534.2	0.62	10078.2	0.69	11329.4	273	220	32941.8	274405	0.00060
9/2/2023	9/3/2023	0.50	8235.5	0.70	11534.3	0.62	10214.7	273	220	29984.5	249771	0.00055
9/3/2023	9/4/2023	0.58	9418.6	0.53	8667.7	0.58	9441.2	273	220	27527.5	229304	0.00050
9/4/2023	9/5/2023	0.64	10464.9	0.56	9145.4	0.64	10510.5	273	220	30120.8	250906	0.00055
9/5/2023	9/6/2023	0.64	10533.2	0.64	10487.6	0.56	9236.5	273	220	30257.2	252043	0.00055
9/6/2023	9/7/2023	0.54	8849.7	0.63	10396.7	0.63	10374.0	273	220	29620.4	246738	0.00054
9/7/2023	9/8/2023	4.08	66771.0	1.79	29279.1	4.01	65701.9	273	220	161752.1	1347395	0.00296
9/8/2023	9/9/2023	1.98	32509.8	8.37	137160.1	8.33	136409.4	273	220	306079.3	2549641	0.00561
9/9/2023	9/10/2023	7.51	122990.9	1.86	30439.5	7.38	120852.4	273	220	274282.8	2284776	0.00503
9/10/2023	9/11/2023	5.43	88993.5	5.48	89771.5	2.57	42037.3	273	220	220802.3	1839283	0.00405
9/11/2023	9/12/2023	9.84	161256.6	4.79	78514.8	8.53	139662.0	273	220	379433.4	3160680	0.00695
9/12/2023	9/13/2023	4.16	68131.6	2.34	38374.6	3.60	58967.8	273	220	165474.0	1378398	0.00303
9/13/2023	9/14/2023	2.12	34807.5	5.63	92228.4	5.63	92228.4	273	220	219264.2	1826471	0.00402
9/14/2023	9/15/2023	8.76	143439.0	6.98	114296.2	3.86	63222.2	273	220	320957.4	2673576	0.00588
9/15/2023	9/16/2023	2.38	38993.4	7.22	118186.0	6.85	112180.0	273	220	269359.4	2243764	0.00494
9/16/2023	9/17/2023	1.77	29028.9	1.72	28141.7	1.62	26549.2	273	220	83719.8	697386	0.00153
9/17/2023	9/18/2023	0.62	10214.8	0.63	10328.4	0.72	11716.3	273	220	32259.5	268722	0.00059
9/18/2023	9/19/2023	1.45	23819.0	4.85	79465.6	4.81	78714.9	273	220	181999.5	1516056	0.00334
9/19/2023	9/20/2023	0.37	6028.8	0.45	7348.2	0.45	7371.0	273	220	20748.0	172831	0.00038
9/20/2023	9/21/2023	0.45	7348.2	0.36	5915.0	0.45	7439.1	273	220	20702.2	172449	0.00038
9/21/2023	9/22/2023	0.26	4231.5	0.26	4231.6	0.17	2866.5	273	220	11329.6	94375	0.00021
9/22/2023	9/23/2023	0.26	4254.3	0.27	4345.3	0.35	5687.6	273	220	14287.2	119012	0.00026
9/23/2023	9/24/2023	0.27	4345.3	0.35	5687.6	0.26	4299.8	273	220	14332.7	119391	0.00026
9/24/2023	9/25/2023	0.34	5642.0	0.25	4163.2	0.26	4208.7	273	220	14013.9	116735	0.00026
9/25/2023	9/26/2023	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
9/26/2023	9/27/2023	0.09	1456.0	0.09	1456.0	0.00	0.0	273	220	2912.0	24257	0.00005
9/27/2023	9/28/2023	0.68	11102.0	0.98	16038.8	0.82	13445.3	273	220	40586.2	338083	0.00074
9/28/2023	9/29/2023	0.53	8713.3	0.44	7211.8	0.45	7416.5	273	220	23341.6	194435	0.00043
9/29/2023	9/30/2023	0.18	2912.0	0.18	2912.0	0.17	2775.5	273	220	8599.5	71634	0.00016
9/30/2023	10/1/2023	0.00	0.0	0.08	1296.8	0.08	1296.8	273	220	2593.6	21605	0.00005
10/1/2023	10/2/2023	0.37	6074.4	0.37	6028.8	0.34	5551.0	273	220	17654.3	147060	0.00032
10/2/2023	10/3/2023	0.80	13103.9	0.80	13058.5	0.83	13650.0	273	220	39812.4	331638	0.00073
10/3/2023	10/4/2023	0.98	16084.2	0.89	14651.1	1.04	17039.7	273	220	47775.0	397966	0.00088
10/4/2023	10/5/2023	2.30	37696.7	2.34	38311.1	2.36	38652.2	273	220	114660.0	955118	0.00210
10/5/2023	10/6/2023	6.04	98939.6	6.09	99826.8	2.44	39971.3	273	220	238737.7	1988685	0.00438
10/6/2023	10/7/2023	8.78	143780.3	8.88	145463.9	2.17	35490.0	273	220	324734.2	2705036	0.00595
10/7/2023	10/8/2023	5.66	92752.0	5.92	96896.9	2.96	48461.6	273	220	238110.5	1983460	0.00436
10/8/2023	10/9/2023	3.59	58786.5	1.55	25407.4	3.58	58668.4	273	220	142862.3	1190043	0.00262
10/9/2023	10/10/2023	3.21	52529.6	0.49	8076.2	3.31	54235.9	273	220	114841.7	956631	0.00210
10/10/2023	10/11/2023	0.45	7302.8	0.48	7939.7	0.41	6643.0	273	220	21885.5	182306	0.00040
10/11/2023	10/12/2023	0.53	8667.8	0.41	6643.2	0.40	6483.7	273	220	21794.7	181550	0.00040
10/12/2023	10/13/2023	0.52	8576.8	0.53	8713.3	0.53	8690.5	273	220	25980.5	216418	0.00048
10/13/2023	10/14/2023	0.80	13172.2	1.07	17449.2	1.33	21839.9	273	220	52461.3	437003	0.00096
10/14/2023	10/15/2023	0.46	7530.3	0.52	8576.7	0.43	7052.5	273	220	23159.5	192918	0.00042
10/15/2023	10/16/2023	0.66	10874.5	0.68	11079.3	0.67	10897.3	273	220	32851.0	273649	0.00060
10/16/2023	10/17/2023	1.00	16448.2	0.97	15811.3	0.90	14696.4	273	220	46956.0	391143	0.00086
10/17/2023	10/18/2023	0.93	15310.8	0.88	14355.2	0.97	15879.4	273	220	45545.4	379393	0.00083
10/18/2023	10/19/2023	2.70	44248.8	2.64	43316.2	2.45	40062.5	273	220	127627.5	1063137	0.00234
10/19/2023	10/20/2023	3.54	57989.2	5.91	96846.1	6.08	99622.0	273	220	254457.3	2119629	0.00466
10/20/2023	10/21/2023	1.68	27482.0	1.68	27482.0	1.68	27459.3	273	220	82423.4	686587	0.00151
10/21/2023	10/22/2023	0.79	12944.8	0.79	12922.1	0.79	12944.8	273	220	38811.8	323302	0.00071
10/22/2023	10/23/2023	0.08	1274.0	0.08	1274.0	0.08	1274.0	273	220	3822.0	31837	0.00007
10/23/2023	10/24/2023	0.23	3844.8	0.23	3844.8	0.23	3844.8	273	220	11534.3	96081	0.00021
10/24/2023	10/25/2023	0.86	14014.2	0.85	13991.5	0.85	13991.5	273	220	41997.1	349836	0.00077
10/25/2023	10/26/2023	0.22	3662.8	0.22	3662.8	0.22	3662.8	273	220	10988.5	91534	0.00020
10/26/2023	10/27/2023	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
10/27/2023	10/28/2023	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
10/28/2023	10/29/2023	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
10/29/2023	10/30/2023	0.21	3458.0	0.21	3458.0	0.21	3458.0	273	220	10373.9	86415	0.00019
10/30/2023	10/31/2023	0.69	11261.3	0.69	11261.3	0.69	11284.1	273	220	33806.7	281610	0.00062
10/31/2023	11/1/2023	0.29	4777.6	0.29	4777.6	0.29	4777.6	273	220	14332.8	119392	0.00026
11/1/2023	11/2/2023	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
11/2/2023	11/3/2023	0.42	6915.9	0.42	6938.7	0.42	6938.7	273	220	20793.3	173208	0.00038
11/3/2023	11/4/2023	0.82	13376.9	0.82	13399.7	0.82	13399.7	273	220	40176.3	334668	0.00074
11/4/2023	11/5/2023	1.20	19587.6	1.20	19610.4	1.20	19610.4	273	220	58808.4	489874	0.00108
11/5/2023	11/6/2023	1.50	24638.8	1.50	24638.8	1.50	24638.8	273	220	73916.3	615723	0.00135
11/6/2023	11/7/2023	0.39	6347.3	0.39	6347.3	0.39	6347.3	273	220	19042.0	158620	0.00035
11/7/2023	11/8/2023	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
11/8/2023	11/9/2023	0.37	6074.3	0.37	6074.3	0.37	6074.3	273	220	18223.0	151797	0.00033
11/9/2023	11/10/2023	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
11/10/2023	11/11/2023	0.11	1865.4	0.11	1865.4	0.11	1865.4	273	220	5596.3	46617	0.00010
11/11/2023	11/12/2023	0.56	9236.3	0.57	9259.1	0.56	9236.3	273	220	27731.7	231005	0.00051
11/12/2023	11/13/2023	1.33	21749.4	1.33	21772.2	1.33	21772.2	273	220	65293.7	543897	0.00120
11/13/2023	11/14/2023	0.35	5778.5	0.35	5778.5	0.35	5778.5	273	220	17335.5	144405	0.00032
11/14/2023	11/15/2023	0.31	5118.7	0.31	5118.7	0.31	5118.7	273	220	15356.1	127916	0.00028
11/15/2023	11/16/2023	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
11/16/2023	11/17/2023	0.14	2275.0	0.14	2275.0	0.14	2275.0	273	220	6824.9	56851	0.00013
11/17/2023	11/18/2023	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
11/18/2023	11/19/2023	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
11/19/2023	11/20/2023	0.37	6119.7	0.37	6119.7	0.37	6119.7	273	220	18359.0	152931	0.00034
11/20/2023	11/21/2023	0.20	3207.6	0.20	3207.6	0.20	3207.6	273	220	9622.9	80159	0.00018
11/21/2023	11/22/2023	2.53	41382.2	2.52	41359.4	2.53	41382.2	273	220	124123.7	1033951	0.00227
11/22/2023	11/23/2023	0.78	12785.5	0.78	12740.0	0.78	12785.5	273	220	38311.0	319131	0.00070
11/23/2023	11/24/2023	0.64	10487.9	0.64	10465.1	0.64	10487.9	273	220	31440.8	261902	0.00058
11/24/2023	11/25/2023	0.10	1592.5	0.10	1592.5	0.10	1592.5	273	220	4777.4	39796	0.00009
11/25/2023	11/26/2023	0.68	11170.1	0.68	11170.1	0.68	11170.1	273	220	33510.4	279142	0.00061
11/26/2023	11/27/2023	0.27	4413.5	0.27	4413.5	0.27	4413.5	273	220	13240.6	110294	0.00024
11/27/2023	11/28/2023	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
11/28/2023	11/29/2023	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
11/29/2023	11/30/2023	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
11/30/2023	12/1/2023	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
12/1/2023	12/2/2023	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
12/2/2023	12/3/2023	0.22	3571.7	0.22	3571.7	0.22	3571.7	273	220	10715.1	89257	0.00020
12/3/2023	12/4/2023	0.35	5710.3	0.35	5710.3	0.35	5710.3	273	220	17130.8	142699	0.00031
12/4/2023	12/5/2023	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
12/5/2023	12/6/2023	0.00	0.0	0.00	0.0	3.06	50164.1	273	220	50164.1	417867	0.00092
12/6/2023	12/7/2023	0.05	864.5	0.05	864.5	0.05	864.5	273	220	2593.5	21604	0.00005

		WSAC		Hours Online WSAC		WSAC		output per pump			Recirc Rate	PM10
		PUMP A	gallons	PUMP B	gallons	PUMP C	gallons	gpm	TDS (ppm)	Total gallons per day	(lb/day)	lb/day
12/7/2023	12/8/2023	0.22	3571.8	0.22	3594.5	0.22	3594.5	273	220	10760.8	89637	0.00020
12/8/2023	12/9/2023	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
12/9/2023	12/10/2023	0.35	5664.6	0.35	5687.4	0.35	5687.4	273	220	17039.4	141938	0.00031
12/10/2023	12/11/2023	0.35	5733.0	0.35	5733.0	0.35	5733.0	273	220	17199.0	143268	0.00032
12/11/2023	12/12/2023	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
12/12/2023	12/13/2023	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
12/13/2023	12/14/2023	0.06	910.0	0.06	910.0	0.06	910.0	273	220	2730.0	22741	0.00005
12/14/2023	12/15/2023	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
12/15/2023	12/16/2023	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
12/16/2023	12/17/2023	0.26	4322.5	0.26	4322.5	0.26	4322.5	273	220	12967.5	108019	0.00024
12/17/2023	12/18/2023	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
12/18/2023	12/19/2023	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
12/19/2023	12/20/2023	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
12/20/2023	12/21/2023	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
12/21/2023	12/22/2023	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
12/22/2023	12/23/2023	0.12	1933.7	0.12	1933.7	0.12	1933.7	273	220	5801.2	48324	0.00011
12/23/2023	12/24/2023	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
12/24/2023	12/25/2023	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
12/25/2023	12/26/2023	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
12/26/2023	12/27/2023	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
12/27/2023	12/28/2023	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
12/28/2023	12/29/2023	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
12/29/2023	12/30/2023	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
12/30/2023	12/31/2023	0.05	818.9	0.05	818.9	0.05	818.9	273	220	2456.8	20466	0.00005
12/31/2023	1/1/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
1/1/2024	1/2/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
1/2/2024	1/3/2024	0.25	4163.3	0.25	4163.3	0.25	4163.3	273	220	12489.8	104040	0.00023
1/3/2024	1/4/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
1/4/2024	1/5/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
1/5/2024	1/6/2024	3.18	52097.2	3.18	52097.2	3.18	52097.2	273	220	156291.7	1301910	0.00286
1/6/2024	1/7/2024	0.08	1251.2	0.08	1251.2	0.08	1251.2	273	220	3753.7	31269	0.00007
1/7/2024	1/8/2024	0.18	2866.5	0.18	2866.5	0.18	2866.5	273	220	8599.6	71635	0.00016
1/8/2024	1/9/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
1/9/2024	1/10/2024	0.16	2548.0	0.16	2548.0	0.16	2548.0	273	220	7644.1	63676	0.00014
1/10/2024	1/11/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
1/11/2024	1/12/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
1/12/2024	1/13/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
1/13/2024	1/14/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
1/14/2024	1/15/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
1/15/2024	1/16/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
1/16/2024	1/17/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
1/17/2024	1/18/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
1/18/2024	1/19/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
1/19/2024	1/20/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
1/20/2024	1/21/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
1/21/2024	1/22/2024	7.62	124829.4	7.62	124829.4	7.62	124829.4	273	220	374488.3	3119487	0.00686
1/22/2024	1/23/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
1/23/2024	1/24/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
1/24/2024	1/25/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
1/25/2024	1/26/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
1/26/2024	1/27/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
1/27/2024	1/28/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
1/28/2024	1/29/2024	0.05	841.7	0.05	818.9	0.05	841.7	273	220	2502.3	20844	0.00005
1/29/2024	1/30/2024	0.10	1615.3	0.10	1615.3	0.10	1615.3	273	220	4845.9	40366	0.00009
1/30/2024	1/31/2024	0.06	1001.1	0.06	1001.1	0.06	1001.1	273	220	3003.2	25016	0.00006
1/31/2024	2/1/2024	0.08	1251.2	0.08	1251.2	0.00	0.0	273	220	2502.5	20846	0.00005
2/1/2024	2/2/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
2/2/2024	2/3/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
2/3/2024	2/4/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
2/4/2024	2/5/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
2/5/2024	2/6/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
2/6/2024	2/7/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
2/7/2024	2/8/2024	0.09	1410.5	0.06	910.0	0.14	2320.5	273	220	4640.9	38659	0.00009
2/8/2024	2/9/2024	0.10	1569.7	0.27	4436.3	0.18	2866.5	273	220	8872.6	73908	0.00016
2/9/2024	2/10/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
2/10/2024	2/11/2024	0.13	2115.8	0.08	1251.2	0.05	864.5	273	220	4231.5	35248	0.00008
2/11/2024	2/12/2024	0.48	7848.8	0.31	5004.9	0.46	7530.3	273	220	20383.9	169798	0.00037
2/12/2024	2/13/2024	0.18	2934.8	0.19	3185.0	0.19	3071.3	273	220	9191.1	76562	0.00017
2/13/2024	2/14/2024	0.06	1001.0	0.00	0.0	0.06	1001.0	273	220	2002.0	16676	0.00004
2/14/2024	2/15/2024	0.04	614.3	0.04	614.3	0.00	0.0	273	220	1228.5	10233	0.00002
2/15/2024	2/16/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
2/16/2024	2/17/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
2/17/2024	2/18/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
2/18/2024	2/19/2024	0.05	887.2	0.06	1046.5	0.12	1933.7	273	220	3867.5	32216	0.00007
2/19/2024	2/20/2024	0.24	3867.6	0.22	3640.1	0.17	2821.0	273	220	10328.6	86038	0.00019
2/20/2024	2/21/2024	0.25	4140.6	0.25	4140.6	0.34	5505.6	273	220	13786.8	114844	0.00025
2/21/2024	2/22/2024	0.23	3799.2	0.32	5209.7	0.24	3958.5	273	220	12967.4	108019	0.00024
2/22/2024	2/23/2024	0.34	5528.2	0.25	4026.7	0.25	4095.0	273	220	13649.9	113704	0.00025
2/23/2024	2/24/2024	0.37	6119.7	0.40	6620.3	0.43	7052.6	273	220	19792.6	164872	0.00036
2/24/2024	2/25/2024	0.30	4936.9	0.23	3799.2	0.23	3776.6	273	220	12512.7	104231	0.00023
2/25/2024	2/26/2024	0.51	8394.7	0.48	7939.7	0.49	8053.4	273	220	24387.8	203151	0.00045
2/26/2024	2/27/2024	0.36	5846.7	0.24	3981.3	0.45	7371.0	273	220	17199.0	143267	0.00032
2/27/2024	2/28/2024	0.06	932.7	0.06	932.7	0.00	0.0	273	220	1865.5	15540	0.00003
2/28/2024	2/29/2024	0.57	9327.7	0.48	7917.1	0.60	9782.6	273	220	27027.4	225138	0.00050
2/29/2024	3/1/2024	0.59	9600.6	0.78	12717.3	0.68	11170.3	273	220	33488.1	278956	0.00061
3/1/2024	3/2/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
3/2/2024	3/3/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
3/3/2024	3/4/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
3/4/2024	3/5/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
3/5/2024	3/6/2024	0.05	887.3	0.05	887.3	0.00	0.0	273	220	1774.5	14782	0.00003
3/6/2024	3/7/2024	0.29	4823.0	0.36	5892.3	0.40	6483.8	273	220	17199.1	143269	0.00032
3/7/2024	3/8/2024	0.54	8827.0	0.59	9714.2	0.45	7439.2	273	220	25980.4	216417	0.00048
3/8/2024	3/9/2024	0.39	6438.3	0.30	4936.7	0.42	6825.0	273	220	18200.0	151606	0.00033
3/9/2024	3/10/2024	0.22	3662.7	0.22	3617.3	0.16	2548.0	273	220	9828.0	81867	0.00018
3/10/2024	3/11/2024	0.16	2661.8	0.08	1251.2	0.08	1251.2	273	220	5164.3	43018	0.00009
3/11/2024	3/12/2024	0.00	0.0	0.13	2047.5	0.13	2047.5	273	220	4095.0	34112	0.00008
3/12/2024	3/13/2024	0.38	6301.7	0.29	4823.5	0.24	3936.1	273	220	15061.3	125461	0.00028
3/13/2024	3/14/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
3/14/2024	3/15/2024	0.09	1547.0	0.18	2934.7	0.08	1387.7	273	220	5869.4	48892	0.00011
3/15/2024	3/16/2024	0.13	2184.0	0.17	2752.7	0.14	2343.3	273	220	7280.0	60642	0.00013
3/16/2024	3/17/2024	0.51	8394.7	0.50	8167.2	0.49	8053.4	273	220	24615.3	205045	0.00045
3/17/2024	3/18/2024	0.49	7985.2	0.40	6506.4	0.41	6665.8	273	220	21157.4	176241	0.00039
3/18/2024	3/19/2024	0.36	5937.6	0.42	6961.4	0.41	6711.3	273	220	19610.3	163354	0.00036
3/19/2024	3/20/2024	0.55	8940.7	0.53	8622.2	0.54	8872.3	273	220	26435.1	220205	0.00048

		WSAC		Hours Online WSAC		WSAC		output per pump			Recirc Rate	PM10
		PUMP A	gallons	PUMP B	gallons	PUMP C	gallons	gpm	TDS (ppm)	Total gallons per day	(lb/day)	lb/day
3/20/2024	3/21/2024	0.74	12102.9	0.86	14127.7	0.82	13354.3	273	220	39585.0	329743	0.00073
3/21/2024	3/22/2024	0.52	8531.3	0.44	7234.6	0.43	7029.8	273	220	22795.7	189888	0.00042
3/22/2024	3/23/2024	0.38	6188.0	0.38	6165.2	0.18	2934.7	273	220	15288.0	127349	0.00028
3/23/2024	3/24/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
3/24/2024	3/25/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
3/25/2024	3/26/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
3/26/2024	3/27/2024	0.05	864.5	0.00	0.0	0.05	864.5	273	220	1729.0	14403	0.00003
3/27/2024	3/28/2024	0.06	932.7	0.13	2206.7	0.08	1274.0	273	220	4413.5	36764	0.00008
3/28/2024	3/29/2024	0.31	5027.8	0.31	5096.1	0.28	4572.7	273	220	14696.6	122423	0.00027
3/29/2024	3/30/2024	0.09	1478.8	0.12	2028.9	0.21	3393.9	273	220	6901.6	57490	0.00013
3/30/2024	3/31/2024	0.15	2456.9	0.21	3453.8	0.20	3271.7	273	220	9182.4	76490	0.00017
3/31/2024	4/1/2024	0.06	955.5	0.00	0.0	0.06	955.5	273	220	1911.0	15918	0.00004
4/1/2024	4/2/2024	0.35	5801.2	0.34	5619.2	0.32	5278.0	273	220	16698.4	139098	0.00031
4/2/2024	4/3/2024	0.65	10692.6	0.74	12080.2	0.62	10214.7	273	220	32987.4	274785	0.00060
4/3/2024	4/4/2024	0.51	8372.0	0.47	7689.5	0.49	8008.0	273	220	24069.4	200498	0.00044
4/4/2024	4/5/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
4/5/2024	4/6/2024	0.12	1933.7	0.06	955.5	0.06	978.2	273	220	3867.4	32216	0.00007
4/6/2024	4/7/2024	0.06	978.2	0.06	955.6	0.12	1933.8	273	220	3867.6	32217	0.00007
4/7/2024	4/8/2024	0.29	4777.5	0.36	5823.9	0.24	3958.4	273	220	14559.9	121284	0.00027
4/8/2024	4/9/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
4/9/2024	4/10/2024	0.69	11329.7	0.72	11716.3	0.70	11534.3	273	220	34580.3	288054	0.00063
4/10/2024	4/11/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
4/11/2024	4/12/2024	0.30	4845.7	0.31	5073.2	0.28	4641.0	273	220	14559.9	121284	0.00027
4/12/2024	4/13/2024	0.82	13377.1	0.52	8576.8	0.82	13354.3	273	220	35308.1	294117	0.00065
4/13/2024	4/14/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
4/14/2024	4/15/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
4/15/2024	4/16/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
4/16/2024	4/17/2024	0.40	6620.2	0.48	7939.7	0.43	7006.9	273	220	21566.8	179651	0.00040
4/17/2024	4/18/2024	0.36	5869.5	0.36	5869.5	0.36	5869.5	273	220	17608.5	146679	0.00032
4/18/2024	4/19/2024	0.44	7166.1	0.52	8485.8	0.44	7189.0	273	220	22840.9	190265	0.00042
4/19/2024	4/20/2024	0.16	2684.4	0.08	1342.2	0.08	1342.2	273	220	5368.9	44723	0.00010
4/20/2024	4/21/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
4/21/2024	4/22/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
4/22/2024	4/23/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
4/23/2024	4/24/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
4/24/2024	4/25/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
4/25/2024	4/26/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
4/26/2024	4/27/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
4/27/2024	4/28/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
4/28/2024	4/29/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
4/29/2024	4/30/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
4/30/2024	5/1/2024	0.00	0.0	0.88	14400.7	0.89	14628.2	273	220	29029.0	241811	0.00053
5/1/2024	5/2/2024	0.37	6028.8	0.27	4345.3	0.27	4459.1	273	220	14833.2	123560	0.00027
5/2/2024	5/3/2024	0.16	2684.5	0.17	2866.5	0.17	2729.9	273	220	8280.9	68980	0.00015
5/3/2024	5/4/2024	0.16	2616.2	0.17	2843.7	0.16	2639.0	273	220	8099.0	67464	0.00015
5/4/2024	5/5/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
5/5/2024	5/6/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
5/6/2024	5/7/2024	0.05	887.3	0.00	0.0	0.05	887.3	273	220	1774.5	14782	0.00003
5/7/2024	5/8/2024	0.26	4254.1	0.24	3981.2	0.16	2684.4	273	220	10919.7	90961	0.00020
5/8/2024	5/9/2024	0.25	4117.7	0.23	3822.0	0.34	5528.2	273	220	13467.8	112187	0.00025
5/9/2024	5/10/2024	1.11	18245.4	1.18	19383.0	1.11	18109.0	273	220	55737.4	464293	0.00102
5/10/2024	5/11/2024	5.87	96096.3	7.56	123874.1	7.55	123623.8	273	220	343594.1	2862139	0.00630
5/11/2024	5/12/2024	7.24	118554.6	7.24	118531.8	7.24	118531.8	273	220	355618.2	2962300	0.00652
5/12/2024	5/13/2024	2.59	42469.7	2.59	42447.0	2.59	42447.0	273	220	127363.6	1060939	0.00233
5/13/2024	5/14/2024	1.76	28892.0	1.77	28937.5	1.77	28914.7	273	220	86744.1	722579	0.00159
5/14/2024	5/15/2024	0.77	12694.3	0.77	12694.4	0.85	13968.4	273	220	39357.1	327845	0.00072
5/15/2024	5/16/2024	2.28	37424.3	2.52	41268.5	2.65	43385.0	273	220	122077.8	1016908	0.00224
5/16/2024	5/17/2024	0.89	14582.7	0.89	14605.5	0.89	14582.7	273	220	43770.9	364611	0.00080
5/17/2024	5/18/2024	0.35	5801.2	0.43	7075.2	0.43	7052.4	273	220	19928.9	166008	0.00037
5/18/2024	5/19/2024	0.53	8713.3	0.46	7553.0	0.45	7439.3	273	220	23705.6	197468	0.00043
5/19/2024	5/20/2024	0.53	8667.6	0.53	8667.7	0.52	8553.9	273	220	25889.3	215658	0.00047
5/20/2024	5/21/2024	0.17	2821.0	0.16	2616.2	0.16	2661.8	273	220	8099.0	67464	0.00015
5/21/2024	5/22/2024	0.26	4231.6	0.25	4095.0	0.34	5505.6	273	220	13832.2	115222	0.00025
5/22/2024	5/23/2024	0.38	6165.2	0.40	6483.8	0.44	7143.5	273	220	19792.6	164872	0.00036
5/23/2024	5/24/2024	0.43	7007.1	0.51	8326.5	0.42	6870.5	273	220	22204.1	184960	0.00041
5/24/2024	5/25/2024	0.25	4140.6	0.17	2707.3	0.25	4117.8	273	220	10965.6	91344	0.00020
5/25/2024	5/26/2024	0.25	4163.2	0.25	4163.2	0.16	2684.6	273	220	11011.0	91722	0.00020
5/26/2024	5/27/2024	0.35	5755.8	0.35	5664.7	0.34	5596.5	273	220	17017.0	141752	0.00031
5/27/2024	5/28/2024	0.37	6051.5	0.36	5869.6	0.35	5733.0	273	220	17654.1	147059	0.00032
5/28/2024	5/29/2024	0.45	7371.0	0.45	7370.9	0.54	8781.5	273	220	23523.4	195950	0.00043
5/29/2024	5/30/2024	0.00	0.0	0.00	0.0	0.00	0.0	273	220	0.0	0	0.00000
5/30/2024	5/31/2024	2.11	34602.9	5.42	88793.4	5.90	96642.1	273	220	220038.5	1832921	0.00403
5/31/2024	6/1/2024	2.03	33261.3	8.53	139798.7	8.66	141801.7	273	220	314861.7	2622798	0.00577
6/1/2024	6/2/2024	0.72	11739.0	0.73	11943.8	0.72	11716.3	273	220	35399.0	294874	0.00065
6/2/2024	6/3/2024	0.44	7234.4	0.52	8599.3	0.44	7279.9	273	220	23113.7	192537	0.00042
6/3/2024	6/4/2024	0.27	4481.8	0.18	3003.0	0.28	4527.2	273	220	12012.0	100060	0.00022
6/4/2024	6/5/2024	8.96	146714.6	8.92	146113.8	1.34	21967.1	273	220	314795.5	2622247	0.00577
6/5/2024	6/6/2024	8.70	142460.2	1.83	29902.7	9.25	151478.6	273	220	323841.5	2697600	0.00593
6/6/2024	6/7/2024	2.38	38993.2	7.71	126262.4	8.62	141186.2	273	220	306441.8	2552660	0.00562
6/7/2024	6/8/2024	1.35	22158.3	1.25	20543.1	1.27	20816.2	273	220	63517.5	529101	0.00116
6/8/2024	6/9/2024	0.72	11852.7	0.81	13263.2	0.81	13240.4	273	220	38356.3	319508	0.00070
6/9/2024	6/10/2024	0.71	11625.3	0.63	10328.5	0.63	10351.3	273	220	32305.1	269101	0.00059
6/10/2024	6/11/2024	2.38	38984.5	6.26	102479.1	6.61	108267.6	273	220	249731.2	2080261	0.00458
6/11/2024	6/12/2024	11.37	186185.8	1.42	23328.5	11.15	182650.6	273	220	392164.9	3266734	0.00719
6/12/2024	6/13/2024	7.79	127545.2	6.10	99940.1	2.85	46714.7	273	220	274200.1	2284087	0.00502
6/13/2024	6/14/2024	0.94	15424.5	0.93	15310.8	0.94	15401.7	273	220	46137.1	384322	0.00085
6/14/2024	6/15/2024	0.73	11943.7	0.73	11875.5	0.73	11898.2	273	220	35717.5	297526	0.00065
6/15/2024	6/16/2024	0.53	8644.9	0.52	8462.9	0.52	8508.6	273	220	25616.4	213385	0.00047
6/16/2024	6/17/2024	0.45	7393.7	0.45	7416.5	0.54	8895.2	273	220	23705.4	197466	0.00043
6/17/2024	6/18/2024	0.07	1160.3	0.07	1160.3	0.00	0.0	273	220	2320.5	19330	0.00004
6/18/2024	6/19/2024	1.46	23978.3	1.52	24934.0	1.51	24661.0	273	220	73573.4	612866	0.00135
6/19/2024	6/20/2024	1.11	18200.0	1.02	16698.4	1.06	17426.5	273	220	52324.9	435866	0.00096
6/20/2024	6/21/2024	0.89	14605.4	0.98	15993.1	0.98	15993.3	273	220	46591.8	388110	0.00085
6/21/2024	6/22/2024	6.64	108813.4	1.55	25366.3	6.38	104422.7	273	220	238602.3	1987557	0.00437
6/22/2024	6/23/2024	9.90	162093.7	9.81	160651.3	1.01	16575.4	273	220	339320.4	2826539	0.00622
6/23/2024	6/24/2024	1.43	23386.9	9.17	150182.5	9.10	148999.5	273	220	322568.9	2686999	0.00591
6/24/2024	6/25/2024	11.91	195013.2	11.80	193261.5	1.53	25047.6	273	220	413322.2	3442974	0.00757
6/25/2024	6/26/2024	9.60	157261.7	9.45	154722.8	1.64	26789.9	273	220	338774.4	2821990	0.00621
6/26/2024	6/27/2024	1.38	22554.3	1.26	20611.3	1.21	19824.4	273	220	62990.1	524707	0.00115
6/27/2024	6/28/2024	0.73	11966.5	0.73	11921.0	0.73	11921.1	273	220	35808.6	298286	0.00066
6/28/2024	6/29/2024	0.94	15401.7	1.04	16971.5	1.03	16903.3	273	220	49276.6	410474	0.00090
6/29/2024	6/30/2024	0.95	15538.1	0.94	15379.0	0.94	15356.3	273	220	46273.4	385457	0.00085
6/30/2024	7/1/2024	0.96	15651.9	0.96	15674.7	0.96	15720.0	273	220	47046.6	391898	0.00086
7/1/2024	7/2/2024	0.60	9873.4	8.78	143893.5	8.75	143393.1	273	220	297160.0	2475343	0.00545

		WSAC		Hours Online WSAC		WSAC		output per pump			Recirc Rate	PM10
		PUMP A	gallons	PUMP B	gallons	PUMP C	gallons	gpm	TDS (ppm)	Total gallons per day	(lb/day)	lb/day
7/2/2024	7/3/2024	10.01	163936.7	0.34	5505.5	10.02	164164.1	273	220	333606.2	2778940	0.00611
7/3/2024	7/4/2024	11.51	188497.4	11.48	187996.8	0.32	5187.1	273	220	381681.2	3179405	0.00699
7/4/2024	7/5/2024	14.40	235871.8	14.05	230070.5	1.26	20679.6	273	220	486621.9	4053561	0.00892
7/5/2024	7/6/2024	15.43	252729.9	16.44	269223.6	1.31	21407.7	273	220	543361.2	4526199	0.00996
7/6/2024	7/7/2024	1.49	24465.6	13.40	219446.4	12.21	199940.2	273	220	443852.2	3697289	0.00813
7/7/2024	7/8/2024	1.20	19587.6	13.60	222754.8	13.62	223050.5	273	220	465392.9	3876723	0.00853
7/8/2024	7/9/2024	9.32	152629.9	0.73	11898.6	9.36	153290.1	273	220	317818.7	2647429	0.00582
7/9/2024	7/10/2024	10.29	168577.2	10.16	166438.7	0.53	8735.9	273	220	343751.9	2863453	0.00630
7/10/2024	7/11/2024	13.14	215228.3	0.52	8508.5	13.32	218231.3	273	220	441968.0	3681594	0.00810
7/11/2024	7/12/2024	9.38	153722.0	15.60	255587.0	16.63	272340.3	273	220	681649.3	5678139	0.01249
7/12/2024	7/13/2024	4.87	79725.1	17.75	290745.0	17.75	290745.0	273	220	661215.1	5507922	0.01212
7/13/2024	7/14/2024	7.88	129151.8	4.01	65757.2	9.21	150819.5	273	220	345728.5	2879919	0.00634
7/14/2024	7/15/2024	2.12	34784.6	8.65	141686.8	8.59	140754.1	273	220	317225.5	2642488	0.00581
7/15/2024	7/16/2024	4.97	81376.9	0.89	14650.9	5.01	82013.8	273	220	178041.5	1483086	0.00326
7/16/2024	7/17/2024	2.59	42451.5	2.53	41473.4	1.59	26003.0	273	220	109927.9	915699	0.00201
7/17/2024	7/18/2024	5.89	96414.4	6.07	99394.6	1.40	22863.5	273	220	218672.5	1821542	0.00401
7/18/2024	7/19/2024	13.02	213294.6	0.87	14173.6	13.17	215774.9	273	220	443243.1	3692215	0.00812
7/19/2024	7/20/2024	16.33	267517.4	11.98	196163.9	6.04	98926.3	273	220	562607.6	4686522	0.01031
7/20/2024	7/21/2024	8.06	132050.2	20.47	335289.4	12.41	203216.3	273	220	670555.9	5585731	0.01229
7/21/2024	7/22/2024	7.92	129697.6	8.41	137737.7	2.55	41800.9	273	220	309236.2	2575938	0.00567
7/22/2024	7/23/2024	14.00	229265.3	13.80	226057.6	0.20	3207.8	273	220	458530.7	3819561	0.00840
7/23/2024	7/24/2024	2.12	34648.1	15.71	257347.7	14.92	244403.0	273	220	536398.8	4468202	0.00983
7/24/2024	7/25/2024	13.85	226826.8	15.69	256970.4	3.60	59035.9	273	220	542833.1	4521800	0.00995
7/25/2024	7/26/2024	12.65	207161.6	12.80	209686.8	1.15	18905.3	273	220	435753.7	3629828	0.00799
7/26/2024	7/27/2024	9.45	154745.3	0.90	14787.6	9.60	157202.3	273	220	326735.2	2721704	0.00599
7/27/2024	7/28/2024	0.43	6984.1	0.35	5778.5	0.43	7029.7	273	220	19792.3	164870	0.00036
7/28/2024	7/29/2024	0.72	11830.4	0.75	12239.8	0.74	12102.9	273	220	36173.1	301322	0.00066
7/29/2024	7/30/2024	0.54	8849.7	0.46	7461.9	0.45	7439.2	273	220	23750.8	197844	0.00044
7/30/2024	7/31/2024	0.57	9304.6	0.57	9304.8	0.57	9281.9	273	220	27891.3	232335	0.00051
7/31/2024	8/1/2024	8.17	133883.6	7.85	128651.5	2.05	33624.6	273	220	296159.8	2467011	0.00543
8/1/2024	8/2/2024	12.64	207002.2	12.71	208267.0	0.49	8089.7	273	220	423358.9	3526580	0.00776
8/2/2024	8/3/2024	12.88	210915.6	2.89	47397.8	13.77	225552.7	273	220	483866.1	4030605	0.00887
8/3/2024	8/4/2024	7.47	122294.4	15.19	248739.3	15.05	246487.1	273	220	617520.8	5143948	0.01132
8/4/2024	8/5/2024	4.90	80339.8	9.82	160783.4	9.96	163104.3	273	220	404227.5	3367215	0.00741
8/5/2024	8/6/2024	9.44	154586.4	1.03	16903.1	9.42	154290.7	273	220	325780.2	2713749	0.00597
8/6/2024	8/7/2024	10.50	171935.3	10.48	171717.2	1.30	21239.0	273	220	364891.5	3039546	0.00669
8/7/2024	8/8/2024	1.58	25899.0	12.54	205478.0	12.27	201028.5	273	220	432405.4	3601937	0.00792
8/8/2024	8/9/2024	13.17	215706.2	1.16	18928.0	13.19	216024.7	273	220	450658.9	3753988	0.00826
8/9/2024	8/10/2024	9.36	153390.0	3.05	49904.5	9.41	154108.2	273	220	357402.8	2977165	0.00655
8/10/2024	8/11/2024	9.45	154790.6	1.27	20734.6	9.79	160282.7	273	220	335807.9	2797279	0.00615
8/11/2024	8/12/2024	1.78	29119.7	1.79	29347.4	1.57	25753.0	273	220	84220.1	701553	0.00154
8/12/2024	8/13/2024	0.26	4231.4	8.63	141300.1	8.55	140003.3	273	220	285534.8	2378505	0.00523
8/13/2024	8/14/2024	3.31	54213.0	3.30	54076.4	0.17	2821.0	273	220	111110.4	925550	0.00204
8/14/2024	8/15/2024	1.69	27755.9	1.69	27755.9	0.00	0.0	273	220	55511.8	462413	0.00102
8/15/2024	8/16/2024	5.42	88794.0	5.42	88794.0	0.00	0.0	273	220	177588.0	1479308	0.00325
8/16/2024	8/17/2024	6.08	99896.1	6.08	99896.1	0.00	0.0	274	220	199792.1	1664269	0.00366
8/17/2024	8/18/2024	1.32	21862.3	1.32	21862.3	0.00	0.0	275	220	43724.6	364226	0.00080
8/18/2024	8/19/2024	0.90	14972.9	0.90	14972.9	0.00	0.0	276	220	29945.8	249449	0.00055
8/19/2024	8/20/2024	2.40	39910.8	2.22	36910.0	1.67	27792.1	277	220	104612.9	871426	0.00192
8/20/2024	8/21/2024	4.77	79623.6	1.58	26387.4	4.61	76959.9	278	220	182970.8	1524147	0.00335
8/21/2024	8/22/2024	1.72	28853.2	1.61	26993.1	1.71	28690.5	279	220	84536.8	704192	0.00155
8/22/2024	8/23/2024	0.08	1400.0	0.17	2846.7	0.09	1446.6	280	220	5693.3	47425	0.00010
8/23/2024	8/24/2024	0.16	2716.3	0.17	2856.8	0.16	2716.4	281	220	8289.4	69051	0.00015
8/24/2024	8/25/2024	0.34	5734.0	0.26	4371.1	0.26	4323.9	282	220	14429.0	120193	0.00026
8/25/2024	8/26/2024	0.85	14433.0	0.87	14810.4	0.92	15612.2	283	220	44855.5	373646	0.00082
8/26/2024	8/27/2024	2.12	36115.0	8.23	140286.4	8.45	143978.3	284	220	320379.7	2668763	0.00587
8/27/2024	8/28/2024	2.35	40175.2	9.05	154764.8	9.71	166059.9	285	220	360999.9	3007129	0.00662
8/28/2024	8/29/2024	1.10	18814.2	8.78	150745.6	8.74	149921.2	286	220	319480.9	2661276	0.00585
8/29/2024	8/30/2024	5.07	87391.2	4.90	84450.0	1.92	33124.9	287	220	204966.0	1707367	0.00376
8/30/2024	8/31/2024	6.38	109921.0	1.73	29728.4	6.56	112958.5	287	220	252608.0	2104224	0.00463
8/31/2023	9/1/2023	4.53	78263.8	5.47	94463.9	4.73	81767.8	288	220	254495.5	2119948	0.00466
		654.6		682.7		623.1						0.59009
		Hours		Hours		Hours						Total Lbs per year

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"When Quality Counts"

Analytical Report

WorkOrder: 2408892

Report Created for: MRP San Joaquin Energy, LLC

14950 W. Schulte Road
Tracy, CA 95377

Project Contact: Wayne Toumbs
Project P.O.: TCY-24-14312
Project: WSAC Reservoir 2021 H2O Sample -PTO

Project Location: Tracy, CA
Project Received: 08/12/2024

Analytical Report reviewed & approved for release on 08/19/2024 by:

Christine Askari
Project Manager

The report shall not be reproduced except in full, without the written approval of the laboratory. The analytical results relate only to the items tested. Results reported conform to the most current NELAP standards, where applicable, unless otherwise stated in a case narrative.

1534 Willow Pass Rd. Pittsburg, CA 94565 ♦ TEL: (877) 252-9262 ♦ FAX: (925) 252-9269 ♦ www.mccampbell.com
CA ELAP 1644 ♦ NELAP 4033 ORELAP

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Glossary of Terms & Qualifier Definitions

Client: MRP San Joaquin Energy, LLC **WorkOrder:** 2408892

Project: WSAC Reservoir 2021 H2O Sample -PTO

Glossary Abbreviation

%D	Serial Dilution Percent Difference
95% Interval	95% Confident Interval
CCV	Continuing Calibration Verification.
CCV REC (%)	% recovery of Continuing Calibration Verification.
CPT	Consumer Product Testing not NELAP Accredited
DF	Dilution Factor
DI WET	(DISTLC) Waste Extraction Test using DI water
DISS	Dissolved (direct analysis of 0.45 µm filtered and acidified water sample)
DLT	Dilution Test (Serial Dilution)
DUP	Duplicate
EDL	Estimated Detection Limit
ERS	External reference sample. Second source calibration verification.
ITEF	International Toxicity Equivalence Factor
LCS	Laboratory Control Sample
LCS2	Second LCS for the batch. Spike level is lower than that for the first LCS; applicable to method 1633.
LQL	Lowest Quantitation Level
MB	Method Blank
MB % Rec	% Recovery of Surrogate in Method Blank, if applicable
MDL	Method Detection Limit [1]
ML	Minimum Level of Quantitation
MS	Matrix Spike
MSD	Matrix Spike Duplicate
NA	Not Applicable
ND	Not detected at or above the indicated MDL or RL
NR	Data Not Reported due to matrix interference or insufficient sample amount.
PDS	Post Digestion Spike
PF	Prep Factor
RD	Relative Difference
RL	Reporting Limit [2]
RPD	Relative Percent Difference
RRT	Relative Retention Time
RSD	Relative Standard Deviation
SNR	Surrogate is diluted out of the calibration range
SPK Val	Spike Value

[1] MDL is the minimum measured concentration of a substance that can be reported with 99% confidence that the measured concentration is distinguishable from method blank results. Definition and Procedure for the Determination of the Method Detection Limit, Revision 2, 40CFR, Part 136, Appendix B, EPA 821-R-16-006, December 2016. Values are based upon our default extraction volume/amount and are subject to change.

[2] RL is the lowest level that can be reliably determined within specified limits of precision and accuracy during routine laboratory operating conditions. (The RL cannot be lower than the lowest calibration standard used in the initial calibration of the instrument and must be greater than the MDL.) Values are based upon our default extraction volume/amount and are subject to change.

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Glossary of Terms & Qualifier Definitions

Client: MRP San Joaquin Energy, LLC **WorkOrder:** 2408892

Project: WSAC Reservoir 2021 H2O Sample -PTO

SPKRef Val	Spike Reference Value
SPLP	Synthetic Precipitation Leachate Procedure
ST	Sorbent Tube
TCLP	Toxicity Characteristic Leachate Procedure
TEQ	Toxicity Equivalents
TNTC	“Too Numerous to Count;” greater than 250 colonies observed on the plate.
TZA	TimeZone Net Adjustment for sample collected outside of MAI's Coordinated Universal Time (UTC). (Adjustment for Daylight Saving is not accounted.)
WET (STLC)	Waste Extraction Test (Soluble Threshold Limit Concentration)

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Analytical Report

Client:	MRP San Joaquin Energy, LLC	**WorkOrder:**	2408892
Date Received:	08/12/2024 12:40	**Extraction Method:**	SM2540 C-
Date Prepared:	08/16/2024	**Analytical Method:**	SM2540 C
Project:	WSAC Reservoir 2021 H2O Sample -PTO	**Unit:**	mg/L

Total Dissolved Solids

Client ID	Lab ID	Matrix	Date Collected	Instrument	Batch ID
1-WASC-SA 2024	2408892-001A	Water	08/12/2024 08:57	WetChem	300027

Analytes	Result	RL	DF	Date Analyzed
Total Dissolved Solids	**220**	10.0	1	08/17/2024 13:06

Analyst(s): JME

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Quality Control Report

Client:	MRP San Joaquin Energy, LLC	**WorkOrder:**	2408892
Date Prepared:	08/16/2024	**BatchID:**	300027
Date Analyzed:	08/17/2024	**Extraction Method:**	SM2540 C-
Instrument:	WetChem	**Analytical Method:**	SM2540 C
Matrix:	Water	**Unit:**	mg/L
Project:	WSAC Reservoir 2021 H2O Sample -PTO	**Sample ID:**	MB/LCS/LCSD-300027

QC Summary Report for Total Dissolved Solids

Analyte	MB Result	MDL	RL			
Total Dissolved Solids	ND	10.0	10.0	-	-	-

Analyte	LCS Result	LCSD Result	SPK Val	LCS %REC	LCSD %REC	LCS/LCSD Limits	RPD	RPD Limit
Total Dissolved Solids	968	966	1000	97	97	80-120	0.207	10

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Pittsburg, CA 94565-1701
(925) 252-9262

CHAIN-OF-CUSTODY RECORD

WorkOrder: 2408892 **ClientCode: GWFT** **QuoteID: 242751**

☐ WaterTrax ☐ CLIP ☐ EDF ☑ EQuIS ☑ Dry-Weight ☐ Email ☐ HardCopy ☐ ThirdParty ☐ J-flag
☑ Detection Summary ☐ Excel

Report to:
Wayne Toumbs
MRP San Joaquin Energy, LLC
14950 W. Schulte Road
Tracy, CA 95377
(209) 836-1605 FAX:

Email: WToumbs@mrpgenco.com
cc/3rd Party: fragasa@mrpgenco.com; jlandry@mrpgen
PO: TCY-24-14312
Project: WSAC Reservoir 2021 H2O Sample -PTO

Bill to:
Accounts Payable
MRP San Joaquin Energy, LLC
14950 W. Schulte Road
Tracy, CA 95377
sanjoaquinAP@mrpgenco.com

Requested TAT: 5 days;

Date Received: **08/12/2024**
Date Logged: **08/12/2024**

Lab ID	ClientSampID	Matrix	Collection Date	Hold	Requested Tests (See legend below)											
					1	2	3	4	5	6	7	8	9	10	11	12
2408892-001	1-WASC-SA 2024	Water	8/12/2024 08:57	☐	A	A										

Test Legend:

1	PRDisposal Fee	2	TDS_W	3		4	
5		6		7		8	
9		10		11		12	

Project Manager: Jena Alfaro

Prepared by: Natalie Zaragoza

Comments: Charge for pick ups $50 each

NOTE: Soil samples are discarded 60 days after receipt unless other arrangements are made (Water samples are 30 days).
Hazardous samples will be returned to client or disposed of at client expense.

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WORK ORDER SUMMARY

Client Name: MRP SAN JOAQUIN ENERGY, LLC
Client Contact: Wayne Toumbs
Contact's Email: WToumbs@mrpgenco.com

Project: WSAC Reservoir 2021 H2O Sample -PTO
Comments: Charge for pick ups $50 each

Work Order: 2408892
QC Level: LEVEL 2
Date Logged: 8/12/2024

☐ WaterTrax ☐ CLIP ☐ EDF ☐ Excel ☑ EQuIS ☐ Email ☐ HardCopy ☐ ThirdParty ☐ J-flag

LabID	ClientSampID	Matrix	Test Name	Cont./ Comp.	Bottle & Preservative	U**	Head Space	Dry-Weight	Collection Date & Time	TAT	Test Due Date	Sediment Content	Hold	Sub Out
001A	1-WASC-SA 2024	Water	SM2540C (TDS)	2	500mL HDPE, unprsv.	☐	☐	☐	8/12/2024 8:57	5 days	8/19/2024	Present	☐	☐

NOTES: * STLC and TCLP extractions require 2 days to complete; therefore, all TATs begin after the extraction is completed (i.e., One-day TAT yields results in 3 days from sample submission).

- ISM prep requires 5 to 10 days to complete; therefore, all TATs begin after the extraction is completed (i.e., One-day TAT yields results in 6 to 11 days from sample submission). Due date listed on WO summary will not accurately reflect the time needed for sample preparation.

- Organic extracts are held for 40 days before disposal; Inorganic extract are held for 30 days.

- MAI assumes that all material present in the provided sampling container is considered part of the sample - MAI does not exclude any material from the sample prior to sample preparation unless requested in writing by the client.

U = An unpreserved container was received for a method that suggests a preservation in order to extend hold time for analysis.**

Cont./Comp. = Containers /Composites

2408892

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CHAIN OF CUSTODY RECORD

TURN AROUND TIME: RUSH ☐ 1 DAY ☐ 2 DAY ☐ 3 DAY ☐ STD ■

GeoTracker EDF ☐ PDF ☐ EDD ☐ Write On (DW) ☐ EQuIS ☐ 10 DAY ☐

Effluent Sample Requiring "J" flag ☐ UST Clean Up Fund Project ☐; Claim #_____

Report To: *Johnathon Shea / Wayne Toumbs* **Bill To:**

Company: *MRP San Joaquin Energy LLC*

14950 West Schulte Road **E-Mail:** jshea@mrpgenco.com

Tracy CA 95377 *wtoumbs@mrpgenco.com*

jlandry@mrpgenco.com

Tele: Wayne (209)-836-1605 fragasa@mrpgenco.com

Project #: Quote GWFT_242751 **Project Name:** *WSAC Reservoir 2021 H2O sample -PTO*

Project Location: *Tracy, CA* **Purchase Order#** TCY-24-14312

Sampler Signature:

SAMPLE ID	Location/ Field Point Name	SAMPLING Date	SAMPLING Time	# Containers	MATRIX: Ground Water	Waste Water	Drinking Water	Sea Water	Soil	Air	Sludge	Other	METHOD PRESERVED: HCL	HNO_3	Other	Total Dissolved Solids (TDS)
1-WASC- SA 2024	WASC basin	8-12-24	8:57	2								x			x	x

Analysis Request

**MAI clients MUST disclose any dangerous chemicals known to be present in their submitted samples in concentrations that may cause immediate harm or serious future health endangerment as a result of brief, gloved, open air, sample handling by MAI staff. Non-disclosure incurs an immediate $250 surcharge and the client is subject to full legal liability for harm suffered. Thank you for your understanding and for allowing us to work safely.

*** If metals are requested for water samples and the water type is not specified on the chain of custody, then MAI will default to metals by E200.8.

Relinquished By:	Date:	Time:	Received By:
	8/12/24	09:10	
Relinquished By:	Date:	Time:	Received By:
	8/12/24	1340	8/12/24 1240
Relinquished By:	Date:	Time:	Received By:

ICE/t° 3 Twt 1230

GOOD CONDITION_____

HEAD SPACE ABSENT_____

DECHLORINATED IN LAB_____

APPROPRIATE CONTAINERS_____

PRESERVED IN LAB_____

COMMENTS:

VOAS O&G METALS OTHER HAZARDOUS:

PRESERVATION_____ pH<2_____

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Sample Receipt Checklist

Client Name:	MRP San Joaquin Energy, LLC	Date and Time Received:	8/12/2024 12:40
Project:	WSAC Reservoir 2021 H2O Sample -PTO	Date Logged:	8/12/2024
		Received by:	Natalie Zaragoza
WorkOrder №:	2408892 Matrix:	Logged by:	Natalie Zaragoza
Carrier:	Oscar Madrigal (MAI contract courier)		

Chain of Custody (COC) Information

Chain of custody present?	Yes	☑	No	☐		
Chain of custody signed when relinquished and received?	Yes	☑	No	☐		
Chain of custody agrees with sample labels?	Yes	☑	No	☐		
Sample IDs noted by Client on COC?	Yes	☑	No	☐		
Date and Time of collection noted by Client on COC?	Yes	☑	No	☐		
Sampler's name noted on COC?	Yes	☐	No	☑		
COC agrees with Quote?	Yes	☑	No	☐	NA	☐

Sample Receipt Information

Custody seals intact on shipping container/cooler?	Yes	☐	No	☐	NA	☑
Custody seals intact on sample bottles?	Yes	☐	No	☐	NA	☑
Shipping container/cooler in good condition?	Yes	☑	No	☐		
Samples in proper containers/bottles?	Yes	☑	No	☐		
Sample containers intact?	Yes	☑	No	☐		
Sufficient sample volume for indicated test?	Yes	☑	No	☐		

Sample Preservation and Hold Time (HT) Information

All samples received within holding time?	Yes	☑	No	☐	NA	☐
Samples Received on Ice?	Yes	☑	No	☐		
(Ice Type: WET ICE)						
Sample/Temp Blank temperature	Temp: 3.7°C				NA	☐
ZHS conditional analyses: VOA meets zero headspace requirement (VOCs, TPHg/BTEX, RSK)?	Yes	☐	No	☐	NA	☑
Sample labels checked for correct preservation?	Yes	☑	No	☐		
pH acceptable upon receipt (Metal: <2)?	Yes	☐	No	☐	NA	☑

UCMR Samples:

pH tested and acceptable upon receipt (200.7: ≤2; 533: 6 - 8; 537.1: 6 - 8)?	Yes	☐	No	☐	NA	☑
Free Chlorine tested and acceptable upon receipt (<0.1mg/L) [not applicable to 200.7]?	Yes	☐	No	☐	NA	☑

Comments:

Appendix F

Biological Resources Mitigation Implementation and Monitoring Plan
Bio-2

1507 ½ Dockery Ave Selma, Ca 93662
Cell: 559-341-3982
TRCcompanies.com

December 20, 2024 *Submitted electronically*

JT Shea
San Joaquin Energy Inc.
14950 W. Schulte Road
Tracy, CA 95377

Subject: Tracy Combined Cycle Power Plant Condition Bio-2, 2024 Annual Biological Report.

Dear JT Shea:

On November 18, 2024, I visited the Tracy Combined Cycle Power Plant to conduct the annual biological resources inspection as required by Condition Number Bio-2 of the Final Commission Decision for CEC Project No. 08-AFC-07. I was accompanied on my inspection of the plant by yourself, JT Shea, EHS Specialist, who answered questions regarding on-site activities over the last year. Below is a summary of my findings.

Activities/Tasks Accomplished

Typical operational and maintenance activities took place within the plant. No construction or demolition has occurred since the last inspection. Plant staff continue to inspect and maintain the perimeter fence to help prevent wildlife from entering the plant The fence is in good condition. The yard surface is predominantly covered with gravel and was clean of trash and debris. There was no evidence of leaks or spills. The interior of the plant is free of vegetation. The annual grassland vegetation in the mitigation area southwest of the plant looked to be in good shape. No evidence of OHV or horse traffic in the area. The laydown yard used for previous construction is fully vegetated with no erosion issues. No avoidance or mitigation measures are recommended for regular operations and maintenance activities.

Pre-Activity Surveys

Due to the lack of construction activities performed by San Joaquin Energy, no biological surveys were warranted this year.

Mitigation/Minimization Measures Implemented

Construction-related minimization measures for the protection of special-status species were not required. As part of plant operations, all workers employed general housekeeping measures and were observant of any wildlife within the plant. Site was clean and free of any trash or debris from employees or operations.

Worker Training

New employees are provided the Worker Environmental Awareness Training. In addition, all visitors to the plant view a safety video which includes a brief discussion of sensitive wildlife species and instructs visitors to alert plant staff of any sensitive wildlife sightings.

Sensitive Wildlife Observed within the Plant

Wildlife observed during the inspection was limited to common bird species including rock pigeon (*Columba livia*), and Mouring doves (*Zenaida macroura*). There were higher winds than previous years so wildlife activity was minimal.

Agency Visits

The San Joaquin County environmental Health Department conducted a routine site inspection to ensure compliance with SPCC, Hazardous waste management, California Accidental Release program, and Hazardous Material Business Plan requirements.

Incidents and Reported Takes/Harassments of Sensitive Wildlife

There were no incidents or takes associated with sensitive wildlife species.

Please feel free to contact me if you have any questions or require additional information.

Sincerely,

Dennis Lederer

CEC-Designated Biologist

Appendix G

Hazardous Materials Inventory
Haz-1

Hazardous Materials
On- Site during 2024

Material	CAS No.	Application	Hazardous Characteristics	Maximum Quantity On Site
Aqueous Ammonia (29.5% NH3 by weight)	7664-41-7	Control oxides of nitrogen (NOx) emissions through selective catalytic reduction	Health: irritation to permanent damage from inhalation, ingestion, and skin contact Physical: reactive, vapor is combustible	67,000 pounds
Carbon Monoxide (Balance Nitrogen)	630-08-0	CEMS Calibration Std.	Health: headaches, dizziness, convulsions, loss of consciousness, death Physical: flammable	1,600 ft3
Citric Acid	77-92-9	Cleaning Ultrafiltration unit membranes	Health: none Physical: non-flammable	100 pounds
Cleaning chemicals/detergents for Turbine Wash	None	Periodic cleaning of combustion turbine	Health: refer to individual chemical labels Physical: refer to individual chemical labels	Varies as needed (approx 100 gallons)
Diesel Fuel #2	None	Fuel for fire pump engine/off-road vehicles	Health: may be carcinogenic Physical: flammable	550 gallons
Hydraulic Oil	None	High-pressure combustion turbine starting system, turbine control valve actuators	Health: hazardous if ingested Physical: combustible	500 gallons
Hydrochloric Acid	7647-01-0	Cleaning Ultrafiltration unit membranes	Health: strongly corrosive and toxic, toxic by ingestion, strong irritant to eyes and skin Physical: non-flammable	200 gallons
Laboratory Reagents	None	Water/wastewater laboratory analysis	Health: refer to individual chemical labels Physical: refer to individual chemical labels	10 gallons liquids 100 pounds solids
Lubrication Oil	None	Lubricate rotating equipment (e.g., gas turbine and steam turbine bearings)	Health: hazardous if ingested Physical: flammable	40,000 gallons

Mineral Insulating Oil	8012-95-1	Transformers/switch yard	Health: hazardous if ingested Physical: may be flammable/combustible	80,000 gallons
Nitric Oxide (balance Nitrogen)	10102-43-9	CEMS Calibration Std.	Health: irritating to eyes and respiratory system, cyanosis, inhalation may result in chemical pneumonitis and pulmonary edema Physical: non-flammable	2,200 ft3
Propylene Glycol	57-55-6	Antifreeze	Health: causes irritation Physical: combustible	2,000 gallons
Powerfilm 1000	NA	Steam Line Corrosion Inhibitor	Not a hazardous substance or mixture	110 gallons
Sodium Hypochlorite	7681-52-9	Cleaning Ultrafiltration unit membranes	Health: corrosive and toxic, toxic by ingestion, strong irritant to tissue Physical: fire risk when in contact with organic materials	120 gallons
Sulfur Hexafluoride	2551-62-4	Switchyard/ switchgear devices	Health: hazardous if inhaled Physical: non-flammable	200 pounds
Sulfuric Acid (Lead-Acid Batteries)	7664-93-9	Battery Electrolyte	Health: strongly corrosive, strong irritant to all tissue, minor burns to permanent damage to tissue Physical: non-flammable	3,000 pounds
Coagulant	12042-91-0	Coagulant for clarifier	Health: Eye Irritant, respiratory irritant.	110 gallons
Flocculent	64742−47−8	Flocculent for Clarifier	Health: Eye Irritant, respiratory irritant.	110 gallons
Argon, Compressed	7440-37-1	Welding gas	Health: Asphyxiant, Contact with rapidly expanding gas may cause burns or frostbite. Contact with cryogenic liquid can cause frostbite and cryogenic burns. Physical: Flammable	250 Pounds

Oxygen, Compressed	7782-44-7	Welding Gas	Health: May cause eye, skin, or respiratory irritation. Contact with rapidly expanding gas may cause burns or frostbite. Contact with cryogenic liquid can cause frostbite and cryogenic burns. Physical: Oxidizing agent	250 Pounds
Calcium hypochlorite	7778-54-3	Biocide for potable Water System	Health: Eye, skin, and Respiratory irritant. Physical: Chemically reactive, strong oxidizing agent.	100 Pounds
Oxalic Acid, Dihydrate 99.6%	6153-56-6	Chemical cleaning of Ultrafiltration unit membranes	Health: Irritant, corrosive, inhalation hazard. Physical: Corrosive Solid	400 pounds
Aqueous Ammonia (18.9% NH3 by weight)	7664-41-7	Control of Steam Boiler chemistry	Health: irritation to permanent damage from inhalation, ingestion, and skin contact Physical: reactive, vapor is combustible	990 gallons
R99 Renewable Diesel	None	Fuel for offroad vehicles and emergency generators	Health: may be carcinogenic Physical: flammable	550 gallons

Appendix H

Site Specific Operations on-site Security Plan
Haz-7

Leach, Taylor

From: Ali, Anwar@Energy <anwar.ali@energy.ca.gov>
Sent: Tuesday, May 3, 2022 10:17 AM
To: Leach, Taylor
Cc: Archibald, John; Shepard, Randy; Shephard, Joseph; Ragasa, Ferdinand; Hurst (Woodard), Kathy; Ross, Sterling; 'Jon Boyer'; Claude Couvillion; Graham Baldwin; Ehren Ochsenrider; Austin Ness; Fooks, Brett@Energy; Huber, Elizabeth@Energy; Ali, Anwar@Energy
Subject: CEC has removed Site Security Plan (HAZ-7) from 2021 CEC Annual Report of Compliance - Project #08-AFC-07

Hi Taylor,

CEC staff was concerned about the inclusion of the Site Security Plan (HAZ-7) in the 2021 ACR. Since, the ACR is public document, we believe it is inappropriate to reveal the Site Security Plan for the project to the public for security reasons. So, for the future ACR submittals, please make sure that the Site Security Plan is removed from the ACR package; an affidavit would be enough. However, CEC staff would still want to see an updated security plan that could be submitted separately.

For the 2021 ACR, I have removed pages 267-271 and kept the affidavit page that was on page 272.

FYI, I have docketed the revised 2021 ACR last week.

Thank you.

Anwar

From: Leach, Taylor <Taylor.Leach@naes.com>
Sent: Monday, April 18, 2022 3:46 PM
To: Ali, Anwar@Energy <anwar.ali@energy.ca.gov>
Cc: Archibald, John <John.Archibald@naes.com>; Shepard, Randy <Randy.Shepard@naes.com>; Shephard, Joseph <Joseph.Shephard@naes.com>; Ragasa, Ferdinand <Ferdinand.Ragasa@naes.com>; Hurst (Woodard), Kathy <Kathy.Hurst@NAES.com>; Ross, Sterling <Sterling.Ross@naes.com>; 'Jon Boyer' <jboyer@mrpgenco.com>; Claude Couvillion <jcouvillion@mrpgenco.com>; Graham Baldwin <gbaldwin@mrpgenco.com>; Ehren Ochsenrider <eochsenrider@mrpgenco.com>; Austin Ness <aness@mrpgenco.com>
Subject: 2021 CEC Annual Report of Compliance - Project #08-AFC-07

Attached is the 2021 CEC Annual Report of Compliance for the Tracy Combined Cycle Power Plant Project #08-AFC-07. Please let me know if you have any questions regarding this report.

Taylor Leach
EHS Specialist
209-275-7079

Tracy: 14950 West Schulte Rd, Tracy CA 95377
Hanford: 10596 Idaho Ave, Hanford, CA 93230
Henrietta: 16027 25th Ave, Lemoore, CA 93245
Malaga: 2611 E. North Ave, Fresno, CA 93725

AFFIDAVIT OF COMPLIANCE FOR PROJECT OWNERS

I, JOSEPH K. SHEPHARD, PLANT MANAGER

(Name of Person signing affidavit)/(Title)

Do hereby certify that the background investigations to ascertain the accuracy of the identity and employment history of all employees of MRP San Joaquin Energy, LLC for employment at:

San Joaquin Energy, Tracy Combined Cycle Power Plant have been conducted as required by the California Energy Commission Decision for the above-named facility.

Signature of officer or agent

Dated this 26th day of April, 2023

THIS AFFIDAVIT OF COMPLIANCE SHALL BE APPENDED TO THE PROJECT SECURITY PLAN AND SHALL BE RETAINED AT ALL TIMES AT THE PROJECT SITE FOR REVIEW BY THE CALIFORNIA ENERGY COMMISSION COMPLIANCE PROJECT MANAGER

Airgas

Mike Baty
Operations Supervisor
Airgas NCN
3970 Wilcox Rd
Stockton, Ca. 95215
(209) 931-2470 Fax (209) 931-2479
Cell: (209) 993-8653
http://www.airgas.com
mike.baty@airgas.com

Vendor Name: Airgas NCN
Address: 3970 Wilcox Rd
City: Stockton, State: CA Zip: 95215
Number: 290-931-2470
Fax: 209-931-2479

GWF Tracy
Combined Cycle Project
14950 West Schulte Road
Tracy, CA 95377

Subject: Hazardous Material Delivery to the GWF Tracy Combined Cycle Project per California Energy Commissioner, Conditions of Certification HAZ-5

Dear GWF,

Airgas NCN, Stockton, will abide by the California Energy Commissioner approved trucking route for the delivery of hazardous material to the project site. We will be delivering the following hazardous material(s) listed below.

Hazardous Material(s):
Gases;
Oxygen Compressed, Argon Compressed, Nitrogen Compressed, Argon/Carbon Dioxide Mix, Acetylene Dissolved,
Welding Rod:
7018 welding electrodes,

We will follow the CEC approved hazardous material delivery trucking route:

- I-580 to Patterson Pass Road to West Schulte Road to the plant site
  or
- I-205 to Mountain House Road to West Schulte Road to the plant site.

Respectfully, 6/2/11
Mike Baty
Operations Supervisor
Airgas NCN, Stockton

Appendix I

Noise Complaint Resolution
Noise-2

TRACY COMBINED CYCLE POWER PLANT – NOISE-2

Tracy Combined Cycle Power Plant Project 08-AFC-07, Condition Noise-2 requires MRPSJE to document, investigate, evaluate and attempt to resolve all project-related noise complaints throughout the operation of the project.

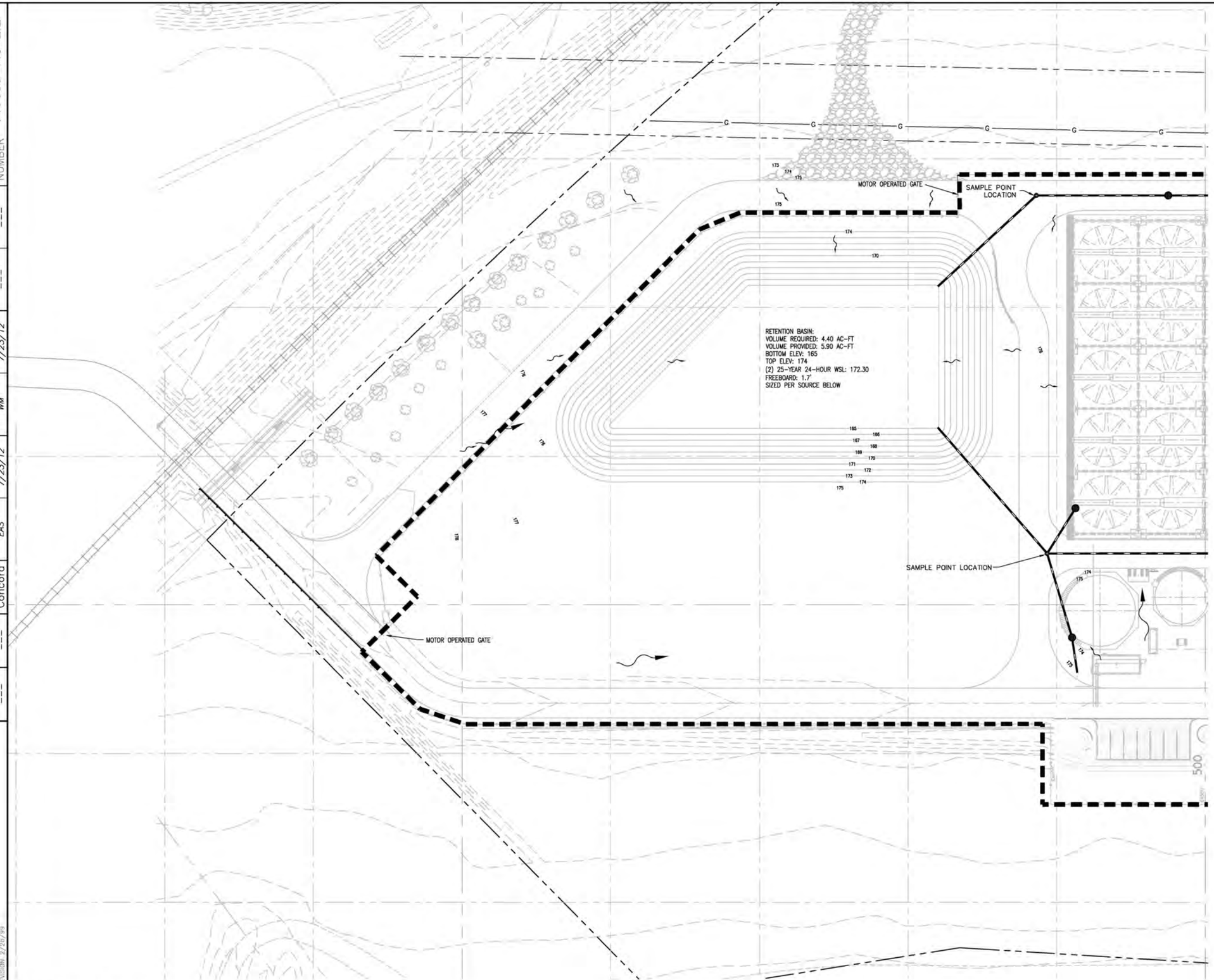
No complaints were received in the year 2024.

Appendix J

Storm Water BMP monitoring and maintenance activities
Soil & Water-2

DRAWN BY	CHECKED BY	APPROVED BY	DRAWING NUMBER
EAS 7/23/12	WM 7/23/12	--- ---	145653-FIG 2.2

OFFICE	X-REF	IMAGE
Concord	---	---



LEGEND:

- EXISTING CONTOUR
- EXISTING SPOT ELEVATION
- PROPERTY LINE
- LIMITS OF SITE
- NEW FENCE
- SURFACE DRAINAGE FLOW INDICATOR
- PERSONNEL GATE
- CATCH BASIN
- MANHOLE
- CULVERT
- OH — EXISTING OVERHEAD POWER LINES
- G — EXISTING UNDERGROUND GAS LINES
- EXISTING POWER LINE TRANSMISSION TOWER
- INLET
- EXISTING TREES.

SITE NORTH

SCALE
0 30 60 FEET

SOURCE:
EROSION AND SEDIMENT CONTROL PLAN, GWF COMBINED CYCLE POWER PLANT, KIMLEY-HORN AND ASSOCIATES, INC., NOVEMBER, 2010.

Shaw Environmental, Inc.

GWF ENERGY, LLC.
SWPPP

FIGURE 2.2

GRADING AND DRAINAGE PLAN
(WESTERN SECTION)
GWF COMBINED CYCLE POWER PLANT

FORMAT REVISION 9/26/99

SOIL & WATER-2: Prior to site mobilization, the project owner shall obtain CPM approval for a site-specific Drainage, Erosion, and Sedimentation Control Plan (DESCP) that ensures protection of water quality and soil resources of the project site and all linear facilities for both the construction and operation phases of the project. This plan shall address appropriate methods and actions, both temporary and permanent, for the protection of water quality and soil resources, demonstrate no increase in offsite flooding potential, meet local requirements, and identify all monitoring and maintenance activities. Additionally, the plan shall incorporate the construction sequence of taking the existing retention basin offline, installing a modified drainage network, and constructing the new retention basin. Monitoring activities shall include routine measurement of the volume of accumulated sediment in the stormwater retention basin. Maintenance activities must include removal of accumulated sediment from the retention basin when an average depth of 0.5 feet of sediment has accumulated in the retention basin. The plan shall be consistent with the grading and drainage plan as required by Condition of Certification

The capacity of the storm water basin is 5.90 ac-ft. The original depth of the storm water basin was 10 feet and 1.7'.

TRACY COMBINED CYCLE POWER PLANT – Soil & Water -2

Tracy Combined Cycle Power Plant Project 08-AFC-07, Condition Soil & Water-2 requires MRP Sand Joaquin Energy to evaluate and document any erosion observed in the storm water basin.

The capacity of the storm water basin is 5.90 ac-ft. The original depth of the storm water basin was 10 feet and 1.7 inches. The current depth of the basin is 10 feet and 1.7 inches.

No erosion has been observed during this reporting period (2023 - 2024).

Appendix K

Annual Water Use Summary
Soil & Water-4

Water Usage Summary: *All Units in Ac-Ft*												
	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
January	1.1	2.6	1.4	0.7	0.8	2.0	1.7	1.2	1.2	1.6	1.5	2.0
Feburary	0.1	1.7	0.5	1.1	1.2	1.0	2.4	1.2	1.3	1.3	1.3	2.1
March	0.8	1.2	2.2	3.0	1.7	2.4	3.1	1.2	1.0	1.7	1.4	2.6
April	1.7	2.0	3.8	1.9	2.2	2.5	2.5	0.8	2.2	0.1	3.2	3.8
May	0.9	1.8	2.9	1.3	2.0	1.3	1.6	1.2	2.6	1.7	1.7	2.0
June	1.7	2.8	10.6	2.3	3.7	2.2	4.0	1.5	4.0	4.2	2.3	3.9
July	5.6	3.4	4.2	2.7	5.9	7.4	3.0	0.1	7.7	3.7	5.8	6.5
August	3.8	0.5	0.3	2.5	4.1	5.1	5.3	1.7	5.3	5.0	5.1	5.2
September	5.5	2.5	1.4	1.3	5.2	3.1	4.0	0.6	4.7	6.7	4.4	3.7
October	2.0	3.8	2.9	1.4	4.5	3.9	3.1	1.4	2.0	2.2	3.9	4.9
November	1.9	1.5	2.2	0.7	2.6	3.9	3.5	1.2	1.6	0.3	3.6	3.4
December	2.7	0.4	2.6	0.9	3.0	1.9	1.9	2.1	2.2	0.7	2.0	2.2

Annual Water Usage			
Year	Total	Monthly Min	Monthly Max
2012	17.3	0.0	4.5
2013	27.7	0.1	5.6
2014	24.2	0.4	3.8
2015	35.1	0.3	10.6
2016	19.7	0.7	3.0
2017	36.8	0.8	5.9
2018	36.6	1.0	7.4
2019	36.0	1.6	5.3
2020	14.2	0.1	2.1
2021	35.7	1.0	7.7
2022	29.3	0.1	6.7
2023	36.1	1.3	6.7
2024	42.3	2.0	2.0

* All water is surface water, sourced from the Delta-Mendota Canal

Meter Verification
Magnetic Flowmeter

Tuesday, April 30, 2024

12:36:39 PM

Instrument Owner : Sanjoaquin Enegy
Company :

Contact Name/Tested By :
Telephone :

Transmitter Identification

Transmitter Tag :
Transmitter Model : 8712E
Transmitter Serial Number : 596546

Sensor Identification

Sensor Serial Number : 242063

Transmitter Configuration

Calibration Number : 0867605608535005
Upper Range Value : 892.00000 gal/min
Lower Range Value : 0.00000 gal/min
Line Size : 6.00 in
Damping : 2.00000 Sec

Test Conditions and Verification Limits

Test Condition : No flow, Full Pipe
No Flow Limit : 3 %
Flowing Limit : 2 %
Empty Pipe Limit : 5 %

Sensor Health Verification Results

Coil Resistance Baseline : 11.11319 ohm
Measured Coil Resistance : 10.78353 ohm
Coil Circuit Test Result : Pass
Electrode Resistance Baseline : 52.68371
Measured Electrode Resistance : 51.17455
Electrode Circuit Test Result : Pass

Sensor Calibration Verification Results

Coil Inductance Baseline : 36.09742
Measured Coil Inductance : 36.05362
Sensor Deviation : -0.12136 %
Sensor Calibration Test Result : Pass

Transmitter Calibration Verification Result

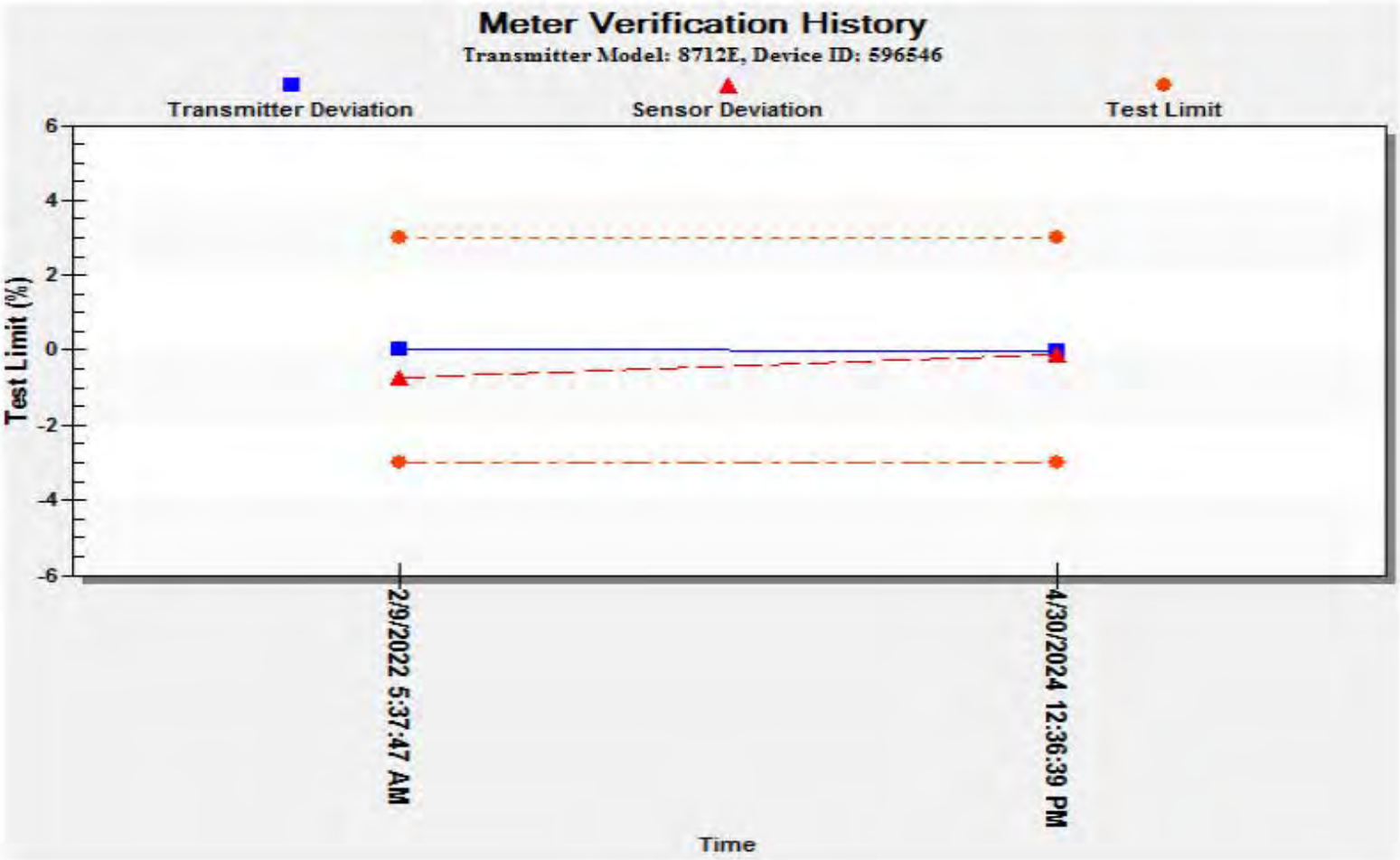
Simulated Velocity : 30.00000 ft/s
Actual Velocity : 29.99853 ft/s
Transmitter Deviation : -0.00490 %
Calibration Test Result : Pass

Meter Verification Test Result

Result : Pass

_____

Customer Signature


Meter Verification History
Transmitter Model: 8712E, Device ID: 596546
Transmitter Deviation
Sensor Deviation
Test Limit
6
4
2
0
-2
-4
-6
Test Limit (%)
2/9/2022 5:37:47 AM
4/30/2024 12:36:39 PM
Time

NOTES

1.Methodology

Verification of the mag product is based on using a secondary parameter, coil signature, to verify that the magnetic field has not changed since the device was calibrated at the factory. Based on Faraday's law, the induced voltage measured by the meter is proportional to the velocity of the fluid, the distance between the electrodes, and the magnetic field strength. Since the distance between the electrodes is mechanically fixed, by confirming that the magnetic field has not changed, the performance of the meter can be verified.

2.Procedural Keys

The transmitter takes a measurement of the coil signature, coil resistance, and electrode resistance and compares it to a baseline value. Deviations from these baseline values are then calculated and checked against the test criteria. The coil signature test verifies that the magnetic field has not changed. The coil resistance test verifies the health of the coil circuit. The electrode resistance check verifies the health of the electrode circuit. Additionally, a transmitter test is conducted to verify that the transmitter is interpreting the signals from the sensor correctly and is providing an accurate flow measurement. These measurements and tests can be conducted while the device is in service allowing the process to continue to operate during the verification cycle.

3.Outcome

Passing of the meter verification test indicates that the device is within normal operating procedures and is measuring as accurately as when it left the factory.

Meter Verification
Magnetic Flowmeter

Wednesday, November 20, 2024

10:29:49 AM

Instrument Owner : TCCPP
Company : MRP SJE

Contact Name/Tested By : D MYERS
Telephone :

Transmitter Identification

Transmitter Tag :
Transmitter Model : 8712E
Transmitter Serial Number : 596546

Sensor Identification

Sensor Serial Number : 242063

Transmitter Configuration

Calibration Number : 0867605608535005
Upper Range Value : 892.00000 gal/min
Lower Range Value : 0.00000 gal/min
Line Size : 6.00 in
Damping : 2.00000 Sec

Test Conditions and Verification Limits

Test Condition : No flow, Full Pipe
No Flow Limit : 3 %
Flowing Limit : 2 %
Empty Pipe Limit : 5 %

Sensor Health Verification Results

Coil Resistance Baseline : 11.11319 ohm
Measured Coil Resistance : 10.46572 ohm
Coil Circuit Test Result : Pass
Electrode Resistance Baseline : 52.68371
Measured Electrode Resistance : 39.44302
Electrode Circuit Test Result : Pass

Sensor Calibration Verification Results

Coil Inductance Baseline : 36.09742
Measured Coil Inductance : 35.84652
Sensor Deviation : -0.69509 %
Sensor Calibration Test Result : Pass

Transmitter Calibration Verification Result

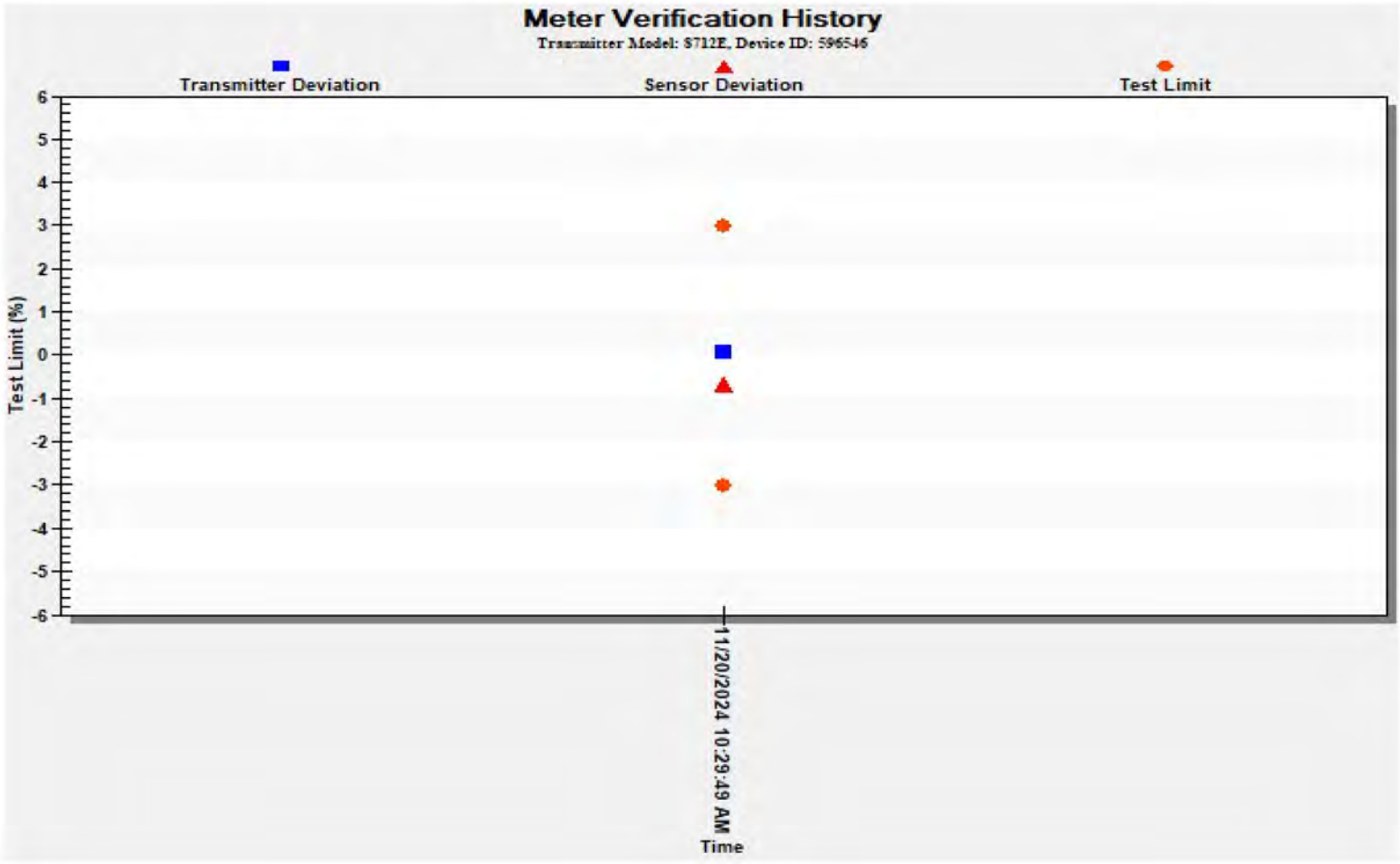
Simulated Velocity : 30.00000 ft/s
Actual Velocity : 30.02206 ft/s
Transmitter Deviation : 0.07353 %
Calibration Test Result : Pass

Meter Verification Test Result

Result : Pass

_____

Customer Signature


Meter Verification History
Transmitter Model: 8712E, Device ID: 596546
Transmitter Deviation
Sensor Deviation
Test Limit
Test Limit (%)
6
5
4
3
2
1
0
-1
-2
-3
-4
-5
-6
11/20/2024 10:29:49 AM
Time

NOTES

1.Methodology

Verification of the mag product is based on using a secondary parameter, coil signature, to verify that the magnetic field has not changed since the device was calibrated at the factory. Based on Faraday's law, the induced voltage measured by the meter is proportional to the velocity of the fluid, the distance between the electrodes, and the magnetic field strength. Since the distance between the electrodes is mechanically fixed, by confirming that the magnetic field has not changed, the performance of the meter can be verified.

2.Procedural Keys

The transmitter takes a measurement of the coil signature, coil resistance, and electrode resistance and compares it to a baseline value. Deviations from these baseline values are then calculated and checked against the test criteria. The coil signature test verifies that the magnetic field has not changed. The coil resistance test verifies the health of the coil circuit. The electrode resistance check verifies the health of the electrode circuit. Additionally, a transmitter test is conducted to verify that the transmitter is interpreting the signals from the sensor correctly and is providing an accurate flow measurement. These measurements and tests can be conducted while the device is in service allowing the process to continue to operate during the verification cycle.

3.Outcome

Passing of the meter verification test indicates that the device is within normal operating procedures and is measuring as accurately as when it left the factory.

Appendix L

Industrial Wastewater and Contact Storm Water
Soil & Water-6

TRACY COMBINED CYCLE POWER PLANT – Soil & Water-6

Tracy Combined Cycle Power Plant Project 08-AFC-07, Condition Soil and Water-6 prohibits discharges other than non-contact stormwater by MRP San Joaquin Energy.

MRPSJE discharges all its stormwater to the on-site stormwater basin. No stormwater leaves the site. Wastewater generated by turbine washing is hauled off-site and disposed of as non-hazardous waste. Contact storm water is collected in the secondary containment areas built around equipment to catch stormwater. The water is checked for oil residue and either left to evaporate or sent to the oil/water separator. The water from the clean water side of the oil/water separator is recycled to the raw water storage tank for use in the water systems.

No stormwater discharges have ever taken place from the stormwater pond to date.

Appendix M

Surface Treatment Maintenance
Vis-6

TRACY COMBINED CYCLE POWER PLANT – Vis-6

Tracy Combined Cycle Power Plant Project # -08-AFC-07, Condition Vis-6 requires MRP San Joaquin Energy to provide a status report regarding surface treatment maintenance.

The plant was inspected and did not find any major painted surfaces in need of maintenance. Touch up painting throughout the facility occurred in 2018 and is performed continuously as needed.

No major painting or other major surface treatment maintenance is planned for 2025.

Appendix N

Hazardous Waste Disposal
Waste-6

Table 1. Estimated Non-Hazardous Wastes Generated During Operations and Maintenance

Material Type	Disposal Method (onsite reuse, salvage for future use, recycling or landfill disposal)	Final Destination (company name and location)	Estimated Quantity (cubic yards [cy] unless stated otherwise)
Bottles and Cans (glass, aluminum and plastic California Redemption Value containers)	Recycling	Tracy Materials Recovery Facility	<1 cy
Cardboard	Recycling	Tracy Materials Recovery Facility	<5 cy
Electronics (computers, monitors, other)	Recycling and/or proper disposal	Consolidated at GWF Power Systems, Pittsburg, CA	<1 cy
Metals and Metal Scrap	Recycling	Tracy Materials Recovery Facility	<5 cy
Pallets	Recycling	Tracy Materials Recovery Facility	<5 cy
Paper (white and colored)	Recycling	Tracy Materials Recovery Facility	<2 cy
Plastics (non-beverage, non-hazardous containers, film, other)	Landfill Disposal (except certain containers and some film)	Tracy Materials Recovery Facility	<2 cy
Wood (clean)	Recycling	Tracy Materials Recovery Facility	40 cy
Garbage, Solid Waste, Debris, Trash or Rubbish	Landfill Disposal	Tracy Materials Recovery Facility and Transfer Station	10 cy
Water Quality Control filters (sock or cartridge)	Water sediment and particulate filtration media	Tracy Materials Recovery Facility	Less than 500 pounds/year
Combustion Turbine Generator Wash Water (detergent solution)	Collected and held in onsite wastewater holding tank. Trucked offsite for recycling at a wastewater processing facility.	Evergreen Oil in Newark, CA	6,000 gallons/year
Oily water from oil/water separator	Onsite re-use after carbon filtration. Filtered water enters raw water tank	N/A	5,000 gallons /year
Clarifier sludge	Landfill Disposal	Tracy Delta Disposal Service	<1 cubic yard

Table 2. Estimated Hazardous Wastes Generated During Operations and Maintenance

Waste	Origin	Composition	Estimated Quantity (pounds per year [lb/yr] or gallons per year [gal/yr] unless stated otherwise)	Classification	Disposal
Oily debris	Parts and equipment maintenance, minor leaks and spills	Absorbents, rags, soil, hydrocarbons	1,300 lb/yr	Hazardous	Recycle or dispose at a permitted TSDF
Drained used oil filters	Gas turbine lubricating oil system	Filter media, metals, and hydrocarbons	1,000 lb/yr	Nonhazardous	Recycle at an approved metal reclamation facility or TSDF
Used oil	Lubrication systems	Hydrocarbons	500 lb/yr	Hazardous	Recycle at authorized used oil collection center or TSDF
Solvents, paints, adhesives	Maintenance	Varies	200 lb/yr	Hazardous	Recycle or dispose at a permitted TSDF
Turbine wash	Water and Detergent solution turbine washes	Detergent solution	6,000 gal/yr	Hazardous or Nonhazardous	Dispose at a permitted TSDF or nonhazardous wastewater processing facility
Laboratory waste	Water treatment lab analyses	Spent reagents/ laboratory wastes	50 gals/yr	Hazardous	Dispose at a permitted TSDF
SCR catalyst units	SCR system (Warranty is 3 years-use tends to be 3 to 5 years)	Metal and heavy metals, including vanadium	60 to 70 tons every 5 to 10 yrs	Hazardous	Recycled by SCR manufacturer or disposed of in Class I landfill

Table 2. Estimated Hazardous Wastes Generated During Operations and Maintenance

Carbon monoxide (CO) catalyst units	Heat recovery steam generator (HRSG) (Use tends to be 3 to 5 years)	Metal and heavy metals, including vanadium	6 to 7 tons every 5 to 10 yrs	Hazardous	Recycled by manufacturer
Spent lead acid batteries	Electrical room, equipment	Heavy metals, corrosive acid	5 batteries/yr	Hazardous	Recycle at a permitted TSDF
Spent alkaline batteries	Electronic equipment	Metals, corrosives	50 lb/yr	Universal waste solids	Recycle at an authorized recycling facility
Fluorescent and H.I.D. lamps	Lighting	Heavy metals	50 lb/yr	Universal Waste	Recycle at an authorized recycling facility
Chemical feed area drainage	Spillage, tank overflow, area washdown water	Water with water treatment chemicals	Minimal	May be hazardous if corrosive	Dispose at a permitted TSDF
Aerosol cans	Non-empty aerosol can waste	Varies; flammable gas	120 lb/yr	Universal Waste	Recycle at a permitted TSDF

Tracy Uniform Hazardous Waste Manifest
2024

EPA ID # CAL000442227

Date	Doc #	Manifest	Weight		Material	code	Designated Facility	To DTSC	iTrack	
7/19/24		019295231FLE	140	P	Non-RCRA Hazardous Waste Liquid (Resin, Water)	135	Enviornmental Waste Solutions Parker South, AZ	8/1/24		
7/19/24		019295231FLE	464	P	Non-RCRA Hazardus Waste Solid (oily solids)	352	Enviornmental Waste Solutions Parker South, AZ	45505		
7/19/24	D647306		250	P	UN2800, Batteries, Wet, Non-spillable, Universal Waste (SEALED LEAD ACID), 8, PGIII (ACT112167)		Clean Earth 1733 Morgan Rd, Modesto, CA 95358			Univeral Waste
7/19/24	D647306		583	P	Universal waste electric devices (ACT190113)		Clean Earth 1733 Morgan Rd, Modesto, CA 95358			Univeral Waste
7/19/24	D647306		25	P	Universal Waste Batteris (alkaline batteries)(Recycle)(ACT96740)		Clean Earth 1733 Morgan Rd, Modesto, CA 95358			Univeral Waste
7/19/24	D647306		22	P	UN3480, Lithium ion batteries, 9, Universal waste (ACT96741)		Clean Earth 1733 Morgan Rd, Modesto, CA 95358			Univeral Waste
7/19/24	D647307		19	P	Universal Waste Lamps, HID, Low Pressure Sodium, Metal Halide, Mecury Vapor (ACT96739)		Clean Earth (AERC) 30677 Huntwood Ave, Hayward, CA 94544			Universal Waste
9/17/24		019922211FLR	5	P	UN3260 Corrosive Solid, acidic, inorganic, n.o.s. (Silicon orthophosphate) 8, PGIII	5	Enviornmental Waste Solutions Parker South, AZ	45565		
9/17/24		019922211FLR	799	P	Non-RCRA Hazardous waste (carbon steel, dirt)	181	Enviornmental Waste Solutions Parker South, AZ	45565		