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City of VERNON CALIFORNIA

April 30, 2025

NOTICE OF INTENT TO FILE
2025 Q1 Compliance Report for the
Malburg Generating Station (01-AFC-25C)

Dear Dr. Ali:

Attached please find the Quarterly Compliance Report for the Malburg Generating Station (01-AFC-25C), covering the operational period of January 1, 2025, through March 31, 2025. This report addresses all quarterly requirements identified in the Final Commission Decision for the Malburg Generating Station (Transaction Number [TN] #28746), as most recently amended on June 20, 2019, by the Errata to Staff Analysis of Petition to Amend the Final Commission Decision (TN #228444).

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

Thank you,

Todd Dusenberry
General Manager of Vernon Public Utilities

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Elyse Engel
Document Control

Enclosure: MGS 2025 Q1 Compliance Report

Jacobs

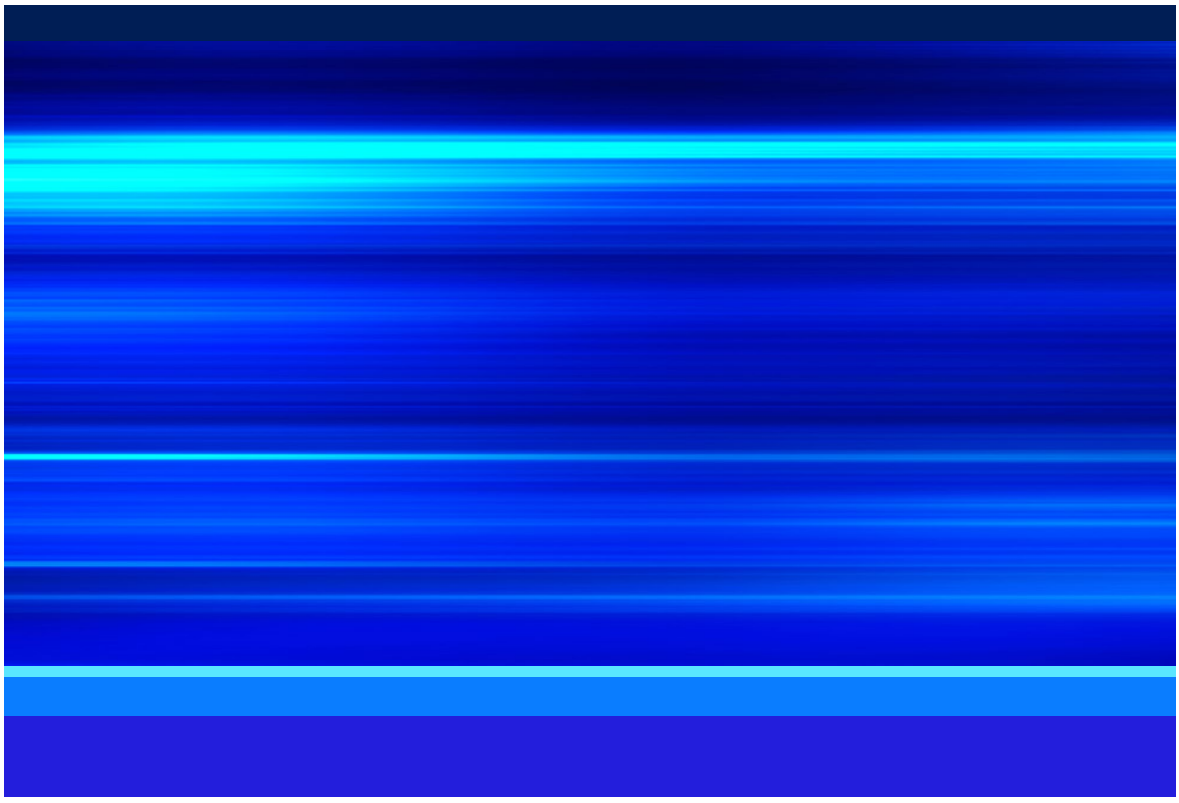
Malburg Generating Station Quarterly Compliance Report (First Quarter 2025)

Submitted to
California Energy Commission

Submitted by
City of Vernon, Public Utilities Department

Document no: 250428145743_d929d567

April 30, 2025



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Acronyms and Abbreviations

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

1. Introduction

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

1.1 Project Location and Description

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

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

1.2 Organization of the Quarterly Compliance Report

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

2. Required Quarterly Compliance Report Documentation

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

Table 2-1. Required Quarterly Compliance Report Documentation

Condition of Certification	Response
AQ-C6	The weekly total dissolved solids (TDS) results for the first quarter of 2025 are provided in Appendix A, Table 2; the weekly sample reports collected for the same period are provided in Appendix B.
AQ-C7	Daily particulate matter with aerodynamic diameter less than or equal to 10 microns (PM_{10}) emissions from cooling tower operation during the first quarter of 2025 are provided in Appendix A, Tables 3 through 5. As shown, emissions were below the specified limit of 6.2 pounds per day (lb/day).
AQ-C8	Testing times for the diesel-fired emergency firewater pump during the first quarter of 2025 are provided in Appendix C, Table 2. MGS refrained from testing the diesel-fired emergency firewater pump in the same hour the CTGs were either started or shutdown.
AQ-C9	The CTG startup and shutdown details for the first quarter of 2025, including the duration and date of occurrence, are provided in Appendix C, Table 1.

Condition of Certification	Response
AQ-C11	All ammonia (NH_3), nitrogen oxides (NOx), sulfur oxides (SOx), carbon monoxide (CO), PM_{10}, and volatile organic compound (VOC) emissions from MGS operation during the first quarter of 2025 are provided in Appendix A, Table 1.
AQ-2	Low sulfur diesel fuel was last purchased on March 18, 2025. The fuel purchase record is provided in Appendix D and demonstrates that the fuel does not contain sulfur compounds in excess of 15 parts per million by weight (ppmw).
AQ-3	See the response for COC AQ-2.
AQ-5	Monthly emissions of CO, PM_{10}, particulate matter with an aerodynamic diameter less than or equal to 2.5 microns ($PM_{2.5}$), VOC, and SOx from CTG and duct burner operation during the first quarter of 2025 are presented in Appendix A, Tables 7 through 9. Fuel usage for each turbine-duct burner pair is provided in Appendix A, Table 6. As shown, emissions were below the monthly limits specified in Condition A63.4 of the site's Title V Permit.
AQ-6	See the response for COC AQ-C9.
AQ-9	See the response for COC AQ-C11. Additionally, quarterly NOx excess emission reports from the data acquisition and handling system (DAHS) are provided in Appendix E. As demonstrated in these reports, there was one incident in which the maximum corrected NOx emissions concentration for CTG 2 exceeded the emission concentration limit of 2.0 parts per million by volume (ppmv); there were no similar incidents for CTG 1 during the reporting period. MGS submitted a Form 500-N for this breakdown event resulting in excess emissions to the South Coast Air Quality Management District (SCAQMD) on April 16, 2025, following verbal notification on March 31, 2025. A copy of the submitted form is provided in Appendix F. All continuous emissions monitoring system (CEMS) data for MGS' CTGs are stored electronically onsite.
AQ-10	See the response for COC AQ-C11. Additionally, quarterly CO excess emission reports from the DAHS are provided in Appendix E. As demonstrated in these reports, there were no incidents in which the maximum corrected CO emissions concentration for either CTG exceeded the emission concentration limit of 2.0 ppmv. All CEMS data for MGS' CTGs are stored electronically onsite.
AQ-11	See the response for COC AQ-C11. Additionally, quarterly VOC excess emission reports from the DAHS are provided in Appendix E. As demonstrated in these reports, there were no incidents in which the maximum corrected VOC emissions concentration for either CTG exceeded the emission concentration limit of 2.0 ppmv. All CEMS data for MGS' CTGs are stored electronically onsite.

Condition of Certification	Response
AQ-12	See the response for COC AQ-C11. Additionally, compliance with the specified limit of 5 parts per million (ppm) is demonstrated through annual or quarterly source testing. The most recent NH_3 compliance source testing for CTG 1 and CTG 2 was performed on February 11 and 12, 2025. The test reports with results were submitted to the CEC on March 26, 2025, and indicated compliance with the emission limit (0.8 ppm for CTG 1 and 0.4 ppm for CTG 2). NH_3 emissions are also calculated via the CEMS on an hourly basis and compared to the NH_3 concentration limit of 5 ppm as an indicator of process functionality.
AQ-13	See the response for COC AQ-C11. Additionally, the most recent triennial compliance source test, performed in July 2022, indicated compliance with the Rule 475 particulate matter emission limits of 5 kilograms per hour (11 pounds per hour [lb/hr]) or 23 milligrams per cubic meter (0.01 grain per standard cubic foot [gr/scf]) for both CTGs (0.67 lb/hr and 0.0003 gr/scf for CTG 1 and 1.83 lb/hr and 0.0007 gr/scf for CTG 2).
AQ-14	See the response for COC AQ-2.
AQ-15	Year-to-date hours of operation for the diesel-fired emergency firewater pump are provided in Appendix A, Table 10. As shown, the year-to-date 2025 hours for maintenance and testing did not exceed 50 hours and the total operational hours did not exceed 200 hours.
AQ-27	See the response for COC AQ-5. As shown, fuel consumption per turbine-duct burner pair did not exceed the specified limit of 405 million cubic feet per month.
AQ-36	See the responses for COCs AQ-5 and AQ-6.

Appendix A
MGS Emission Calculations

Malburg Generating Station
Quarterly Compliance Report
Appendix A, Table 1

Reporting Period: **Quarter 1 2025**

Table 1. Quarterly Emissions - January 1, 2025 through March 31, 2025

Source	Quarterly Emissions (lb/quarter)					
	NOx	CO	VOC	SOx	$PM_{10}/PM_{2.5}$	NH_3
CTG 1 & Duct Burner	2,731	989	578	104.0	2,259	3,424
CTG 2 & Duct Burner	2,466	995	522	94	2,037	3,090
Cooling Tower	--	--	--	--	116.1	--
Diesel Firewater Pump	58.8	1.71	0.43	0.03	0.38	0.10
Total	**5,256**	**1,986**	**1,100**	**198**	**4,412**	**6,514**

Malburg Generating Station
Quarterly Compliance Report
Appendix A, Table 2

Reporting Period: **Quarter 1 2025**

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

Sampling Period		
Start Date	End Date	TDS (ppm)
12/29/2024	1/4/2025	--
1/5/2025	1/11/2025	3,320
1/12/2025	1/18/2025	4,730
1/19/2025	1/25/2025	3,960
1/26/2025	2/1/2025	3,990
2/2/2025	2/8/2025	4,060
2/9/2025	2/15/2025	4,100
2/16/2025	2/22/2025	4,020
2/23/2025	3/1/2025	3,990
3/2/2025	3/8/2025	4,070
3/9/2025	3/15/2025	4,010
3/16/2025	3/22/2025	4,190
3/23/2025	3/29/2025	4,160
3/30/2025	4/5/2025	4,120

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

[2] MGS was primarily offline during December 2024; therefore, no cooling tower sample was collected from 12/29/2024 through 1/4/2025.

Malburg Generating Station
Quarterly Compliance Report
Appendix A, Table 3

Reporting Period: **January 2025**

Cooling Tower Total Dissolved Solids (TDS) Sampling Results

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

Sample Date [1]	Period		TDS (ppm)
	Start Date	End Date	
--	12/29/2024	1/4/2025	--
1/7/2025	1/5/2025	1/11/2025	3,320
1/13/2025	1/12/2025	1/18/2025	4,730
1/21/2025	1/19/2025	1/25/2025	3,960
1/27/2025	1/26/2025	2/1/2025	3,990

[1] MGS was primarily offline during December 2024; therefore, no cooling tower sample was collected from 12/29/2024 through 1/4/2025.

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

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

Constants

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

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

[2] Per COC AQ-C4.

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

Cooling Tower Daily PM_{10} Emissions

Date	Circulation Rate (gal/day) [1]	TDS (ppm) [2]	PM_{10} Emissions (lb/day)	Above 6.2 lb/day PM_{10} Limit? [3]
1/1/2025	0	--	0.00	No
1/2/2025	38,880,000	3,320	1.08	No
1/3/2025	38,880,000	3,320	1.08	No
1/4/2025	38,880,000	3,320	1.08	No
1/5/2025	38,880,000	3,320	1.08	No
1/6/2025	38,880,000	3,320	1.08	No
1/7/2025	38,880,000	3,320	1.08	No
1/8/2025	38,880,000	3,320	1.08	No
1/9/2025	38,880,000	3,320	1.08	No
1/10/2025	38,880,000	3,320	1.08	No
1/11/2025	38,880,000	3,320	1.08	No
1/12/2025	38,880,000	4,730	1.53	No
1/13/2025	38,880,000	4,730	1.53	No
1/14/2025	38,880,000	4,730	1.53	No
1/15/2025	38,880,000	4,730	1.53	No
1/16/2025	38,880,000	4,730	1.53	No
1/17/2025	38,880,000	4,730	1.53	No
1/18/2025	38,880,000	4,730	1.53	No
1/19/2025	38,880,000	3,960	1.28	No
1/20/2025	38,880,000	3,960	1.28	No
1/21/2025	38,880,000	3,960	1.28	No
1/22/2025	38,880,000	3,960	1.28	No
1/23/2025	38,880,000	3,960	1.28	No
1/24/2025	38,880,000	3,960	1.28	No
1/25/2025	38,880,000	3,960	1.28	No
1/26/2025	38,880,000	3,990	1.29	No
1/27/2025	38,880,000	3,990	1.29	No
1/28/2025	38,880,000	3,990	1.29	No
1/29/2025	38,880,000	3,990	1.29	No
1/30/2025	38,880,000	3,990	1.29	No
1/31/2025	38,880,000	3,990	1.29	No

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

[2] In the absence of a sample being collected between December 29, 2024 and January 4, 2025, sample results for the first few days of January were assumed to be best represented by the results sampled on January 7, 2025.

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

Malburg Generating Station
Quarterly Compliance Report
Appendix A, Table 4

Reporting Period: **February 2025**

Cooling Tower Total Dissolved Solids (TDS) Sampling Results

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

Sample Date	Period		TDS (ppm)
	Start Date	End Date	
1/27/2025	1/26/2025	2/1/2025	3,990
2/4/2025	2/2/2025	2/8/2025	4,060
2/11/2025	2/9/2025	2/15/2025	4,100
2/18/2025	2/16/2025	2/22/2025	4,020
2/24/2025	2/23/2025	3/1/2025	3,990

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

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

Constants

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

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

[2] Per COC AQ-C4.

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

Cooling Tower Daily PM_{10} Emissions

Date	Circulation Rate (gal/day) [1]	TDS (ppm)	PM_{10} Emissions (lb/day)	Above 6.2 lb/day PM_{10} Limit? [2]
2/1/2025	38,880,000	3,990	1.29	No
2/2/2025	38,880,000	4,060	1.32	No
2/3/2025	38,880,000	4,060	1.32	No
2/4/2025	38,880,000	4,060	1.32	No
2/5/2025	38,880,000	4,060	1.32	No
2/6/2025	38,880,000	4,060	1.32	No
2/7/2025	38,880,000	4,060	1.32	No
2/8/2025	38,880,000	4,060	1.32	No
2/9/2025	38,880,000	4,100	1.33	No
2/10/2025	38,880,000	4,100	1.33	No
2/11/2025	38,880,000	4,100	1.33	No
2/12/2025	38,880,000	4,100	1.33	No
2/13/2025	38,880,000	4,100	1.33	No
2/14/2025	38,880,000	4,100	1.33	No
2/15/2025	38,880,000	4,100	1.33	No
2/16/2025	38,880,000	4,020	1.30	No
2/17/2025	38,880,000	4,020	1.30	No
2/18/2025	38,880,000	4,020	1.30	No
2/19/2025	38,880,000	4,020	1.30	No
2/20/2025	38,880,000	4,020	1.30	No
2/21/2025	38,880,000	4,020	1.30	No
2/22/2025	38,880,000	4,020	1.30	No
2/23/2025	38,880,000	3,990	1.29	No
2/24/2025	38,880,000	3,990	1.29	No
2/25/2025	38,880,000	3,990	1.29	No
2/26/2025	38,880,000	3,990	1.29	No
2/27/2025	38,880,000	3,990	1.29	No
2/28/2025	38,880,000	3,990	1.29	No

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

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

Malburg Generating Station
Quarterly Compliance Report
Appendix A, Table 5

Reporting Period: **March 2025**

Cooling Tower Total Dissolved Solids (TDS) Sampling Results

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

Sample Date	Period		TDS (ppm)
	Start Date	End Date	
2/24/2025	2/23/2025	3/1/2025	3,990
3/4/2025	3/2/2025	3/8/2025	4,070
3/10/2025	3/9/2025	3/15/2025	4,010
3/18/2025	3/16/2025	3/22/2025	4,190
3/24/2025	3/23/2025	3/29/2025	4,160
4/2/2025	3/30/2025	4/5/2025	4,120

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

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

Constants

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

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

[2] Per COC AQ-C4.

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

Cooling Tower Daily PM_{10} Emissions

Date	Circulation Rate (gal/day) [1]	TDS (ppm)	PM_{10} Emissions (lb/day)	Above 6.2 lb/day PM_{10} Limit? [2]
3/1/2025	38,880,000	3,990	1.29	No
3/2/2025	38,880,000	4,070	1.32	No
3/3/2025	38,880,000	4,070	1.32	No
3/4/2025	38,880,000	4,070	1.32	No
3/5/2025	38,880,000	4,070	1.32	No
3/6/2025	38,880,000	4,070	1.32	No
3/7/2025	38,880,000	4,070	1.32	No
3/8/2025	38,880,000	4,070	1.32	No
3/9/2025	38,880,000	4,010	1.30	No
3/10/2025	38,880,000	4,010	1.30	No
3/11/2025	38,880,000	4,010	1.30	No
3/12/2025	38,880,000	4,010	1.30	No
3/13/2025	38,880,000	4,010	1.30	No
3/14/2025	38,880,000	4,010	1.30	No
3/15/2025	38,880,000	4,010	1.30	No
3/16/2025	38,880,000	4,190	1.36	No
3/17/2025	38,880,000	4,190	1.36	No
3/18/2025	38,880,000	4,190	1.36	No
3/19/2025	38,880,000	4,190	1.36	No
3/20/2025	38,880,000	4,190	1.36	No
3/21/2025	38,880,000	4,190	1.36	No
3/22/2025	38,880,000	4,190	1.36	No
3/23/2025	38,880,000	4,160	1.35	No
3/24/2025	38,880,000	4,160	1.35	No
3/25/2025	38,880,000	4,160	1.35	No
3/26/2025	38,880,000	4,160	1.35	No
3/27/2025	38,880,000	4,160	1.35	No
3/28/2025	38,880,000	4,160	1.35	No
3/29/2025	38,880,000	4,160	1.35	No
3/30/2025	38,880,000	4,120	1.33	No
3/31/2025	38,880,000	4,120	1.33	No

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

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

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

Reporting Period: Quarter 1 2025

Table 6. Monthly Turbine-Duct Burner Fuel Flow

Source	January		February		March	
	Fuel Flow (MMscf/month) [1]	Above 405 MMscf/month Limit? [2]	Fuel Flow (MMscf/month) [1]	Above 405 MMscf/month Limit? [2]	Fuel Flow (MMscf/month) [1]	Above 405 MMscf/month Limit? [2]
CTG 1	9		160		206	
CTG 1 Duct Burner	0.00		0.13		0.59	
Total CTG 1 & Duct Burner	**9**	**No**	**160**	**No**	**207**	**No**
CTG 2	215		68		55	
CTG 2 Duct Burner	0.08		0.40		0.44	
Total CTG 2 & Duct Burner	**215**	**No**	**68**	**No**	**55**	**No**

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

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

Table 7. Monthly Emissions - January 2025

Source	Monthly Emissions (lb/month) [1]					
	NOx [2]	CO	VOC	SOx	$PM_{10}/PM_{2.5}$	NH_3 [3]
CTG 1 & Duct Burner	110	63	14	2.5	53	81
CTG 2 & Duct Burner	1,544	517	332	59.5	1,294	1,959
Monthly Emission Limits [4]	N/A	7,633	3,236	227	4,876	N/A
Exceeds Limit?	N/A	No	No	No	No	N/A

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

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

[3] Monthly NH_3 emissions are calculated using monthly fuel usage and default emission factors from the SCAQMD's AER Combustion Default Emission Factors - December 2024. The emission factors are 9.1 lbs/MMscf and 18.0 lbs/MMscf for the CTGs and Duct Burners, respectively.

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

Table 8. Monthly Emissions - February 2025

Source	Monthly Emissions (lb/month) [1]					
	NOx [2]	CO	VOC	SOx	$PM_{10}/PM_{2.5}$	NH_3 [3]
CTG 1 & Duct Burner	1,143.0	435.4	245.50	44.47	962.3	1,457.3
CTG 2 & Duct Burner	512	216	105	19.0	410	623
Monthly Emission Limits [4]	N/A	7,633	3,236	227	4,876	N/A
Exceeds Limit?	N/A	No	No	No	No	N/A

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

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

[3] Monthly NH_3 emissions are calculated using monthly fuel usage and default emission factors from the SCAQMD's AER Combustion Default Emission Factors - December 2024. The emission factors are 9.1 lbs/MMscf and 18.0 lbs/MMscf for the CTGs and Duct Burners, respectively.

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

Table 9. Monthly Emissions - March 2025

Source	Monthly Emissions (lb/month) [1]					
	NOx [2]	CO	VOC	SOx	$PM_{10}/PM_{2.5}$	NH_3 [3]
CTG 1 & Duct Burner	1,477.1	490.3	318.57	57.10	1,243.06	1,886.04
CTG 2 & Duct Burner	410.4	261	85.22	15.35	333.10	508.0
Monthly Emission Limits [4]	N/A	7,633	3,236	227	4,876	N/A
Exceeds Limit?	N/A	No	No	No	No	N/A

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

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

[3] Monthly NH_3 emissions are calculated using monthly fuel usage and default emission factors from the SCAQMD's AER Combustion Default Emission Factors - December 2024. The emission factors are 9.1 lbs/MMscf and 18.0 lbs/MMscf for the CTGs and Duct Burners, respectively.

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

Malburg Generating Station
Quarterly Compliance Report
Appendix A, Table 10

Reporting Period: **Quarter 1 2025**

Methodology

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

Emission Factors

Pollutant	Emission Factor (lb/Mgal)	Reference
NOx	469	Emission factor provided in the facility's Title V Permit.
CO	13.62	Emission factor converted from the factor provided in the facility's Title V Permit (0.4 g/bhp-hr), based on the unit's power rating (173 hp) and maximum fuel throughput (11.2 gal/hr).
VOC	3.41	Emission factor converted from the factor provided in the facility's Title V Permit (0.1 g/bhp-hr), based on the unit's power rating (173 hp) and maximum fuel throughput (11.2 gal/hr).
SOx	0.21	Default for Diesel/Distillate Oil, ICEs given in the SCAQMD's AER Combustion Default Emission Factors - December 2024.
$PM_{10}/PM_{2.5}$	3.065	Emission factor converted from the factor provided in the facility's Title V Permit (0.09 g/bhp-hr), based on the unit's power rating (173 hp) and maximum fuel throughput (11.2 gal/hr).
NH_3	0.80	Default for diesel combustion equipment without an SNCR or SCR given in the SCAQMD's AER Combustion Default Emission Factors - December 2024.

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

Month	Monthly Hours of Operation [1]			Fuel Usage (gal/month) [2]	Monthly Emissions (lb/month)					
	Maintenance	Testing	Emergency		NOx	CO	VOC	SOx	$PM_{10}/PM_{2.5}$	NH_3
January	0.0	2.0	0.0	22.4	10.5	0.31	0.08	0.00	0.07	0.02
February	0.0	7.2	0.0	80.6	37.8	1.10	0.27	0.02	0.25	0.06
March	0.0	2.0	0.0	22.4	10.5	0.31	0.08	0.00	0.07	0.02
Q1 Total	**0.0**	**11.2**	**0.0**	**125.4**	**58.8**	**1.7**	**0.4**	**0.0**	**0.4**	**0.1**
Annual Total	**0.0**	**11.2**	**0.0**	**125.4**	**58.8**	**1.7**	**0.4**	**0.0**	**0.4**	**0.1**
Annual Limit for Maintenance and Testing [3]			50							
Total Annual Limit [3]			200							
Exceeds Limits?			No							

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

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

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

Appendix B
Cooling Tower Blowdown Reports

POSITIVE
LAB SERVICE

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

January 09, 2025

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

Report No.: 2501025
Project Name: Malburg Generating Station Weekly

Dear Matt Richards,

This report contains the analytical results for the sample(s) received under chain of custody(s) by Positive Lab Service on January 07, 2025.

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

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

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

Project Manager

POSITIVE LAB SERVICE

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

Certificate of Analysis

City of Vernon
4963 Soto St.
Vernon, CA 90058

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

File #:74548
Report Date: 01/09/25
Submitted: 01/07/25
PLS Report No.: 2501025

Project: Malburg Generating Station Weekly

Sample ID: Cooling Tower Blowdown Water (2501025-01) Sampled: 01/07/25 08:15 Received: 01/07/25

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
Total Dissolved Solids	**3320**		1	mg/L	5.0	- SM 2540C	01/07/25	01/07/25	ss	BA50709

Quality Control Data

Analyte	Result	PQL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifier
Batch BA50709 - -										
Blank	**Prepared: 01/06/25 Analyzed: 01/07/25**									
Total Dissolved Solids	ND	5.0	mg/L							
LCS	**Prepared: 01/06/25 Analyzed: 01/07/25**									
Total Dissolved Solids	52.0	5.0	mg/L	50.0		104	80-120			
Duplicate **Source: 2501012-03**	**Prepared: 01/06/25 Analyzed: 01/07/25**									
Total Dissolved Solids	527	5.0	mg/L		535			1.57	5	

Notes and Definitions

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

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

Rick Owen Parker

Authorized Signature(s)

CHAIN OF CUSTODY AND ANALYSIS REQUEST

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

DATE: 1-7-25 PAGE: 1 OF

FILE NO.: LAB NO.: 2501025

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

ADDRESS: 4963 SOTO ST. VERNON CA 90058 OBSERVED TEMP 0.4

PROJECT MANAGER MATT RICHARDS PHONE NO: FAX NO: CORRECTED TEMP: 1.4

SAMPLER NAME: JOHN BARIE SIGNATURE: THERMO ID:---------

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

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

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

ANALYSES REQUESTED

SAMPLE ID	DATE SAMPLED	TIME SAMPLED	SAMPLE DESCRIPTION	MATRIX				TAT	CONTAINER		TDS								SAMPLE CONDITIONS/ CONTAINER/COMMENTS
				WATER	SOIL	SLUDGE	OTHER		#	TYPE									
	1-7-25	0815	COOLING TOWER BLOWDOWN	X				N	1	P	X								

Relinquished by (Signature& Name): MA Received by (Signature & Name): Jon Barie Date: 1-7-25 Time: 0815

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

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

SAMPLE DISPOSITION

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

By: _____ Date: _____

SPECIAL INSTRUCTION:

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

Arrived at the lab 1-7-25 1015

POSITIVE
LAB SERVICE

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

January 20, 2025

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

Report No.: 2501089
Project Name: Malburg Generating Station Weekly

Dear Matt Richards,

This report contains the analytical results for the sample(s) received under chain of custody(s) by Positive Lab Service on January 13, 2025.

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

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

Project Manager

POSITIVE LAB SERVICE

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

Certificate of Analysis

City of Vernon
4963 Soto St.
Vernon, CA 90058

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

File #:74548
Report Date: 01/20/25
Submitted: 01/13/25
PLS Report No.: 2501089

Project: Malburg Generating Station Weekly

Sample ID: Cooling Tower Blowdown Water (2501089-01) Sampled: 01/13/25 08:15 Received: 01/13/25

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
Total Dissolved Solids	**4730**		1	mg/L	5.0	- SM 2540C	01/17/25	01/17/25	ss	BA51712

Quality Control Data

Analyte	Result	PQL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifier
Batch BA51712 - -										
Blank	**Prepared & Analyzed: 01/17/25**									
Total Dissolved Solids	ND	5.0	mg/L							
LCS	**Prepared & Analyzed: 01/17/25**									
Total Dissolved Solids	51.0	5.0	mg/L	50.0		102	80-120			
Duplicate **Source: 2501114-01**	**Prepared & Analyzed: 01/17/25**									
Total Dissolved Solids	4790	5.0	mg/L		4630			3.33	5	

Notes and Definitions

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

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

Rick Owen Parker

Authorized Signature(s)

CHAIN OF CUSTODY AND ANALYSIS REQUEST

POSITIVE LAB SERVICE

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

DATE: 1/3.25 PAGE: 1 OF 1

FILE NO.: LAB NO.: 2501089

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

ADDRESS: 4963 SOTO ST. VERNON CA 90058 OBSERVED TEMP: 0.1°C

PROJECT MANAGER MATT RICHARDS PHONE NO: FAX NO: CORRECTED TEMP: 1.1°C

SAMPLER NAME: JOHN BARIE SIGNATURE: THERMO ID: 61

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

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

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

ANALYSES REQUESTED

SAMPLE ID	DATE SAMPLED	TIME SAMPLED	SAMPLE DESCRIPTION	MATRIX				TAT	CONTAINER		TDS	SAMPLE CONDITIONS/ CONTAINER/COMMENTS
				WATER	SOIL	SLUDGE	OTHER		#	TYPE		
	1/3.25	0815	COOLING TOWER BLOWDOWN	X				N	1	P	X	

Relinquished by (Signature& Name): MA Received by (Signature & Name): John Barie Date: 1/3/25 Time: 0815

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

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

SAMPLE DISPOSITION

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

By: _____ Date: _____

SPECIAL INSTRUCTION:

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

Arrived at the lab 1-13-25 0920

POSITIVE
LAB SERVICE

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

January 27, 2025

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

Report No.: 2501135
Project Name: Malburg Generating Station Weekly

Dear Matt Richards,

This report contains the analytical results for the sample(s) received under chain of custody(s) by Positive Lab Service on January 21, 2025.

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

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

Project Manager

POSITIVE LAB SERVICE

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

Certificate of Analysis

City of Vernon
4963 Soto St.
Vernon, CA 90058

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

File #:74548
Report Date: 01/27/25
Submitted: 01/21/25
PLS Report No.: 2501135

Project: Malburg Generating Station Weekly

Sample ID: Cooling Tower Blowdown Water (2501135-01) Sampled: 01/21/25 07:55 Received: 01/21/25

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
Total Dissolved Solids	**3960**		1	mg/L	5.0	SM 2540C	01/23/25	01/24/25	ss	BA52411

Quality Control Data

Analyte	Result	PQL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifier
Batch BA52411 - -										
Blank	**Prepared: 01/23/25 Analyzed: 01/24/25**									
Total Dissolved Solids	ND	5.0	mg/L							
LCS	**Prepared: 01/23/25 Analyzed: 01/24/25**									
Total Dissolved Solids	53.0	5.0	mg/L	50.0		106	80-120			
Duplicate **Source: 2501135-01**	**Prepared: 01/23/25 Analyzed: 01/24/25**									
Total Dissolved Solids	3930	5.0	mg/L		3960			0.971	5	

Notes and Definitions

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

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

Rick Daren Parlin

Authorized Signature(s)

CHAIN OF CUSTODY AND ANALYSIS REQUEST

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

DATE: 1-21-25 PAGE: 1 OF 1

FILE NO.: LAB NO.: 2501135

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

ADDRESS: 4963 SOTO ST. VERNON CA 90058 OBSERVED TEMP 0.4°C

PROJECT MANAGER MATT RICHARDS PHONE NO: FAX NO: CORRECTED TEMP: 1.4°C

SAMPLER NAME: JOHN BARIE SIGNATURE: THERMO ID: 66

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

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

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

ANALYSES REQUESTED

SAMPLE ID	DATE SAMPLED	TIME SAMPLED	SAMPLE DESCRIPTION	MATRIX				TAT	CONTAINER		TDS								SAMPLE CONDITIONS/ CONTAINER/COMMENTS
				WATER	SOIL	SLUDGE	OTHER		#	TYPE									
	1-21-25	0755	COOLING TOWER BLOWDOWN	X				N	1	P	X								

Relinquished by (Signature& Name): MA Received by (Signature & Name): Jon Barie Date: 1-21-25 Time: 0755

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

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

SAMPLE DISPOSITION

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

By: _____ Date: _____

SPECIAL INSTRUCTION:

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

Arrived at the lab 1-21-25 1210

POSITIVE
LAB SERVICE

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

January 29, 2025

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

Report No.: 2501197
Project Name: Malburg Generating Station Weekly

Dear Matt Richards,

This report contains the analytical results for the sample(s) received under chain of custody(s) by Positive Lab Service on January 27, 2025.

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

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

Project Manager

POSITIVE LAB SERVICE

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

Certificate of Analysis

City of Vernon
4963 Soto St.
Vernon, CA 90058

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

File #:74548
Report Date: 01/29/25
Submitted: 01/27/25
PLS Report No.: 2501197

Project: Malburg Generating Station Weekly

Sample ID: Cooling Tower Blowdown Water (2501197-01) Sampled: 01/27/25 13:55 Received: 01/27/25

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
Total Dissolved Solids	**3990**		1	mg/L	5.0	- SM 2540C	01/28/25	01/28/25	ss	BA52822

Quality Control Data

Analyte	Result	PQL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifier
Batch BA52822 - -										
Blank	**Prepared & Analyzed: 01/28/25**									
Total Dissolved Solids	ND	5.0	mg/L							
LCS	**Prepared & Analyzed: 01/28/25**									
Total Dissolved Solids	57.0	5.0	mg/L	50.0		114	80-120			
Duplicate **Source: 2501197-01**	**Prepared & Analyzed: 01/28/25**									
Total Dissolved Solids	3850	5.0	mg/L		3990			3.66	5	

Notes and Definitions

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

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

Rick Owen Parker

Authorized Signature(s)

POSITIVE LAB SERVICE

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

CHAIN OF CUSTODY AND ANALYSIS REQUEST

DATE: 1/27/25 PAGE: 1 OF 1

AIRBILL NO:

FILE NO.: LAB NO.: 2501197

CLIENT NAME: CITY OF VERNON

PROJECT NAME/NO. MALBURG GENERATING STATION WEEKLY

P.O.NO.

OBSEV. TEMP: 2.1 °C
CORREC. TEMP: 3.1 °C
THERMO ID: 66

ADDRESS: 4963 SOTO ST. VERNON CA 90058

EMAIL:

PROJECT MANAGER: MATT RICHARDS

PHONE NO:

FAX NO:

SAMPLER NAME: LUIS GUTIERREZ

SIGNATURE:

TAT (Turn-Around-Time): 0=Same Day; 1 = 1 Day; 2 = 2 Days, 3 = 3 Days, N = Normal (5-7 Working Days)

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

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

SAMPLE ID	DATE SAMPLED	TIME SAMPLED	SAMPLE DESCRIPTION	MATRIX				TAT	CONTAINER		ANALYSIS REQUESTED								<----PRESERVATION *	SAMPLE CONDITIONS/ CONTAINER/COMMENTS
				WATER	SOIL	SLUDGE	OTHER		#	TYPE	TDS									
	1/27/25	1:55	COOLING TOWER BLOWDOWN	X				N	1	P	X									

REMARKS:

Relinquished by (Signature& Name): N/A

Received by (Signature & Name): Luis Gutierrez

Date: 1/27/25

Time: 1:55

Relinquished by (Signature& Name):

Received by (Signature & Name):

Date:

Time:

Relinquished by (Signature& Name):

Received by (Signature & Name):

Date:

Time:

SAMPLE DISPOSITION

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

By: _____ Date: _____

SPECIAL INSTRUCTION:

Arrived at the lab 1/27/25 3:45

* PRESERVATION: 1-HNO_3, 2-H_2SO_4, 3-HCL, 4-Zinc Acetate, 5-NaOH, 6-NH_4 Buffer, 7-Other

POSITIVE
LAB SERVICE

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

February 10, 2025

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

Report No.: 2502009
Project Name: Malburg Generating Station Weekly

Dear Matt Richards,

This report contains the analytical results for the sample(s) received under chain of custody(s) by Positive Lab Service on February 04, 2025.

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

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

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

Project Manager

POSITIVE LAB SERVICE

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

Certificate of Analysis

City of Vernon
4963 Soto St.
Vernon, CA 90058

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

File #:74548
Report Date: 02/10/25
Submitted: 02/04/25
PLS Report No.: 2502009

Project: Malburg Generating Station Weekly

Sample ID: Cooling Tower Blowdown Water (2502009-01) Sampled: 02/04/25 08:55 Received: 02/04/25

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
Total Dissolved Solids	**4060**		1	mg/L	5.0	- SM 2540C	02/07/25	02/07/25	ss	BB50715

Quality Control Data

Analyte	Result	PQL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifier
Batch BB50715 - -										
Blank	**Prepared & Analyzed: 02/07/25**									
Total Dissolved Solids	ND	5.0	mg/L							
LCS	**Prepared & Analyzed: 02/07/25**									
Total Dissolved Solids	52.0	5.0	mg/L	50.0		104	80-120			
Duplicate **Source: 2502016-01**	**Prepared & Analyzed: 02/07/25**									
Total Dissolved Solids	4400	5.0	mg/L		4540			3.13	5	

Notes and Definitions

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

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

Rick Owen Parlin

Authorized Signature(s)

CHAIN OF CUSTODY AND ANALYSIS REQUEST

POSITIVE LAB SERVICE

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

DATE:_____ PAGE: ____ OF____

FILE NO.:_____ LAB NO.: 2502009

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

ADDRESS: 4963 SOTO ST. VERNON CA 90058 **OBSERVED TEMP**_____

PROJECT MANAGER MATT RICHARDS **PHONE NO:** **FAX NO:** **CORRECTED TEMP:**____

SAMPLER NAME: ~~JOHN BARIE~~ Luis Gutierrez **SIGNATURE:** **THERMO ID:**---------

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

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

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

ANALYSES REQUESTED

SAMPLE ID	DATE SAMPLED	TIME SAMPLED	SAMPLE DESCRIPTION	MATRIX				TAT	CONTAINER		TDS								SAMPLE CONDITIONS/ CONTAINER/COMMENTS
				WATER	SOIL	SLUDGE	OTHER		#	TYPE									
	2/4/25	8:55	COOLING TOWER BLOWDOWN	X				N	1	P	X								

Relinquished by (Signature& Name): N/A

Received by (Signature & Name): Luis Gutierrez

Date: 2/4/25 Time: 8:55

Relinquished by (Signature& Name):

Received by (Signature & Name):

Date: Time:

Relinquished by (Signature& Name):

Received by (Signature & Name):

Date: Time:

SAMPLE DISPOSITION

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

By: _____Date:_____

SPECIAL INSTRUCTION: Arrived at the lab 2/4/25 9:50

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

OBSERV. TEMP: 2.5 °C
CORREC. TEMP: 3.5 °C
THERMO ID: 6 BY: LG

POSITIVE LAB SERVICE

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

February 17, 2025

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

Report No.: 2502126
Project Name: Malburg Generating Station Weekly

Dear Matt Richards,

This report contains the analytical results for the sample(s) received under chain of custody(s) by Positive Lab Service on February 11, 2025.

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

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

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

Project Manager

POSITIVE LAB SERVICE

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

Certificate of Analysis

City of Vernon
4963 Soto St.
Vernon, CA 90058

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

File #:74548
Report Date: 02/17/25
Submitted: 02/11/25
PLS Report No.: 2502126

Project: Malburg Generating Station Weekly

Sample ID: Cooling Tower Blowdown Water (2502126-01) Sampled: 02/11/25 13:25 Received: 02/11/25

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
Total Dissolved Solids	**4100**		1	mg/L	5.0	- SM 2540C	02/12/25	02/13/25	ss	BB51310

Quality Control Data

Analyte	Result	PQL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifier
Batch BB51310 - -										
Blank	**Prepared: 02/12/25 Analyzed: 02/13/25**									
Total Dissolved Solids	ND	5.0	mg/L							
LCS	**Prepared: 02/12/25 Analyzed: 02/13/25**									
Total Dissolved Solids	59.0	5.0	mg/L	50.0		118	80-120			
Duplicate **Source: 2502126-01**	**Prepared: 02/12/25 Analyzed: 02/13/25**									
Total Dissolved Solids	4200	5.0	mg/L		4100			2.41	5	

Notes and Definitions

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

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

Rick Owen Parker

Authorized Signature(s)

CHAIN OF CUSTODY AND ANALYSIS REQUEST

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

DATE:_____ PAGE: ____ OF____

FILE NO.:_____ LAB NO.: 2502126

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

ADDRESS: 4963 SOTO ST. VERNON CA 90058 **ANALYSES REQUESTED** **OBSERVED TEMP**_____

PROJECT MANAGER MATT RICHARDS **PHONE NO:** **FAX NO:** **CORRECTED TEMP:**____

SAMPLER NAME: ~~JOHN BARIE~~ Luis Gutierrez **SIGNATURE:** **THERMO ID:**---------

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

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

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

SAMPLE ID	DATE SAMPLED	TIME SAMPLED	SAMPLE DESCRIPTION	MATRIX				TAT	CONTAINER		TDS								SAMPLE CONDITIONS/ CONTAINER/COMMENTS
				WATER	SOIL	SLUDGE	OTHER		#	TYPE									
	2/11/25	1:25	COOLING TOWER BLOWDOWN	X				N	1	P	X								

Relinquished by (Signature& Name): N/A

Received by (Signature & Name): Luis Gutierrez Date: 2/11/25 Time: 1:25

Relinquished by (Signature& Name):

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

Relinquished by (Signature& Name):

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

SAMPLE DISPOSITION

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

By: _____ Date: _____

SPECIAL INSTRUCTION:

Arrived at the lab 2/11/25 1:55

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

OBSERV. TEMP: 2.1 °C
CORREC. TEMP: 3.1 °C
THERMO ID: 14 BY: CC

POSITIVE LAB SERVICE

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

February 21, 2025

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

Report No.: 2502268
Project Name: Malburg Generating Station Weekly

Dear Matt Richards,

This report contains the analytical results for the sample(s) received under chain of custody(s) by Positive Lab Service on February 18, 2025.

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

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

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

Project Manager

POSITIVE LAB SERVICE

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

Certificate of Analysis

City of Vernon
4963 Soto St.
Vernon, CA 90058

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

File #:74548
Report Date: 02/21/25
Submitted: 02/18/25
PLS Report No.: 2502268

Project: Malburg Generating Station Weekly

Sample ID: Cooling Tower Blowdown Water (2502268-01) Sampled: 02/18/25 09:05 Received: 02/18/25

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
Total Dissolved Solids	**4020**		1	mg/L	5.0	- SM 2540C	02/19/25	02/19/25	ss	BB51909

Quality Control Data

Analyte	Result	PQL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifier
Batch BB51909 - -										
Blank	**Prepared & Analyzed: 02/19/25**									
Total Dissolved Solids	ND	5.0	mg/L							
LCS	**Prepared & Analyzed: 02/19/25**									
Total Dissolved Solids	47.0	5.0	mg/L	50.0		94.0	80-120			
Duplicate **Source: 2502211-01**	**Prepared & Analyzed: 02/19/25**									
Total Dissolved Solids	987	5.0	mg/L		1010			2.34	5	

Notes and Definitions

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

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

Rick Owen Parlier

Authorized Signature(s)

CHAIN OF CUSTODY AND ANALYSIS REQUEST

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

DATE: 2/18/15 PAGE: 1 OF 1
FILE NO.: LAB NO.: 2502268

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

ADDRESS: 4963 SOTO ST. VERNON CA 90058 | ANALYSES REQUESTED | OBSERVED TEMP 1.1°C

PROJECT MANAGER MATT RICHARDS | PHONE NO: | FAX NO: | CORRECTED TEMP: 2.1°C

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

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

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

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

SAMPLE ID	DATE SAMPLED	TIME SAMPLED	SAMPLE DESCRIPTION	MATRIX: WATER	SOIL	SLUDGE	OTHER	TAT	CONTAINER: #	TYPE	TDS	SAMPLE CONDITIONS/ CONTAINER/COMMENTS
	2/18/15	0925	COOLING TOWER BLOWDOWN	X				N	1	P	X	

Relinquished by (Signature& Name): MA | Received by (Signature & Name): J Jon Barie | Date: 2/18/15 | Time: 0925

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

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

SAMPLE DISPOSITION

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

By: _____ Date: _____

SPECIAL INSTRUCTION:

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

Arrived at the lab 2/18/15 0950

POSITIVE
LAB SERVICE

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

February 26, 2025

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

Report No.: 2502388
Project Name: Malburg Generating Station Weekly

Dear Matt Richards,

This report contains the analytical results for the sample(s) received under chain of custody(s) by Positive Lab Service on February 24, 2025.

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

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

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

Project Manager

POSITIVE LAB SERVICE

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

Certificate of Analysis

City of Vernon
4963 Soto St.
Vernon, CA 90058

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

File #:74548
Report Date: 02/26/25
Submitted: 02/24/25
PLS Report No.: 2502388

Project: Malburg Generating Station Weekly

Sample ID: Cooling Tower Blowdown Water (2502388-01) Sampled: 02/24/25 08:25 Received: 02/24/25

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
Total Dissolved Solids	**3990**		1	mg/L	5.0	- SM 2540C	02/24/25	02/25/25	ss	BB52516

Quality Control Data

Analyte	Result	PQL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifier
Batch BB52516 - -										
Blank	**Prepared: 02/24/25 Analyzed: 02/25/25**									
Total Dissolved Solids	ND	5.0	mg/L							
LCS	**Prepared: 02/24/25 Analyzed: 02/25/25**									
Total Dissolved Solids	54.0	5.0	mg/L	50.0		108	80-120			
Duplicate **Source: 2502365-02**	**Prepared: 02/24/25 Analyzed: 02/25/25**									
Total Dissolved Solids	787	5.0	mg/L		800			1.68	5	
Duplicate **Source: 2502388-01**	**Prepared: 02/24/25 Analyzed: 02/25/25**									
Total Dissolved Solids	4070	5.0	mg/L		3990			1.90	5	

Notes and Definitions

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

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

Authorized Signature(s)

CHAIN OF CUSTODY AND ANALYSIS REQUEST

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

DATE: 2-24-15 PAGE: 1 OF 1

FILE NO.: LAB NO.: 2502388

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

ADDRESS: 4963 SOTO ST. VERNON CA 90058 OBSERVED TEMP: 2.0°C

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

SAMPLER NAME: JOHN BARIE SIGNATURE: THERMO ID: 67

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

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

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

ANALYSES REQUESTED

SAMPLE ID	DATE SAMPLED	TIME SAMPLED	SAMPLE DESCRIPTION	MATRIX: WATER	SOIL	SLUDGE	OTHER	TAT	CONTAINER: #	TYPE	TDS	SAMPLE CONDITIONS/ CONTAINER/COMMENTS
	2-24-15	0825	COOLING TOWER BLOWDOWN	X				N	1	P	X	

Relinquished by (Signature& Name): MH Received by (Signature & Name): John Barie Date: 2-24-15 Time: 0825

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

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

SAMPLE DISPOSITION

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

By: _____ Date: _____

SPECIAL INSTRUCTION:

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

Arrived at the lab 2-24-15 0915

POSITIVE
LAB SERVICE

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

March 06, 2025

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

Report No.: 2503010
Project Name: Malburg Generating Station Weekly

Dear Matt Richards,

This report contains the analytical results for the sample(s) received under chain of custody(s) by Positive Lab Service on March 04, 2025.

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

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

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

Project Manager

POSITIVE LAB SERVICE

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

Certificate of Analysis

City of Vernon
4963 Soto St.
Vernon, CA 90058

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

File #:74548
Report Date: 03/06/25
Submitted: 03/04/25
PLS Report No.: 2503010

Project: Malburg Generating Station Weekly

Sample ID: Cooling Tower Blowdown Water (2503010-01) Sampled: 03/04/25 07:35 Received: 03/04/25

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
Total Dissolved Solids	**4070**		1	mg/L	5.0	- SM 2540C	03/04/25	03/04/25	ss	BC50410

Quality Control Data

Analyte	Result	PQL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifier
Batch BC50410 - -										
Blank	**Prepared & Analyzed: 03/04/25**									
Total Dissolved Solids	ND	5.0	mg/L							
LCS	**Prepared & Analyzed: 03/04/25**									
Total Dissolved Solids	59.0	5.0	mg/L	50.0		118	80-120			
Duplicate **Source: 2503002-03**	**Prepared & Analyzed: 03/04/25**									
Total Dissolved Solids	520	5.0	mg/L		505			2.93	5	

Notes and Definitions

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

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

Rick Owen Parlin

Authorized Signature(s)

CHAIN OF CUSTODY AND ANALYSIS REQUEST

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

DATE: 3-4-25 PAGE: 1 OF 1

FILE NO.: LAB NO.: 2503010

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

ADDRESS: 4963 SOTO ST. VERNON CA 90058 OBSERVED TEMP 0.2°C

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

SAMPLER NAME: JOHN BARIE SIGNATURE: THERMO ID: 67

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

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

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

ANALYSES REQUESTED

SAMPLE ID	DATE SAMPLED	TIME SAMPLED	SAMPLE DESCRIPTION	MATRIX				TAT	CONTAINER		TDS								SAMPLE CONDITIONS/ CONTAINER/COMMENTS
				WATER	SOIL	SLUDGE	OTHER		#	TYPE									
	3-4-25	0735	COOLING TOWER BLOWDOWN	X				N	1	P	X								

Relinquished by (Signature& Name): NA Received by (Signature & Name): JW Jonbarie Date: 3-4-25 Time: 0735

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

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

SAMPLE DISPOSITION

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

By: _____ Date: _____

SPECIAL INSTRUCTION:

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

Arrived at the lab 3-4-25 1000

POSITIVE
LAB SERVICE

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

March 13, 2025

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

Report No.: 2503104
Project Name: Malburg Generating Station Weekly

Dear Matt Richards,

This report contains the analytical results for the sample(s) received under chain of custody(s) by Positive Lab Service on March 10, 2025.

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

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

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

John Schmidt
Project Manager

POSITIVE LAB SERVICE

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

Certificate of Analysis

City of Vernon
4963 Soto St.
Vernon, CA 90058

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

File #:74548
Report Date: 03/13/25
Submitted: 03/10/25
PLS Report No.: 2503104

Project: Malburg Generating Station Weekly

Sample ID: Cooling Tower Blowdown Water (2503104-01) Sampled: 03/10/25 08:15 Received: 03/10/25

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
Total Dissolved Solids	**4010**		1	mg/L	5.0	- SM 2540C	03/11/25	03/12/25	ss	BC51305

Quality Control Data

Analyte	Result	PQL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifier
Batch BC51305 - -										
Blank	**Prepared: 03/11/25 Analyzed: 03/12/25**									
Total Dissolved Solids	ND	5.0	mg/L							
LCS	**Prepared: 03/11/25 Analyzed: 03/12/25**									
Total Dissolved Solids	53.0	5.0	mg/L	50.0		106	80-120			
Duplicate **Source: 2503091-03**	**Prepared: 03/11/25 Analyzed: 03/12/25**									
Total Dissolved Solids	30.0	5.0	mg/L		30.0			0.00	5	

Notes and Definitions

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

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

Rick Daren Parlin

Authorized Signature(s)

CHAIN OF CUSTODY AND ANALYSIS REQUEST

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

DATE: 3/10-25 PAGE: 1 OF 1

FILE NO.: LAB NO.: 2503104

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

ADDRESS: 4963 SOTO ST. VERNON CA 90058 OBSERVED TEMP 0.6 °C

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

SAMPLER NAME: JOHN BARIE SIGNATURE: THERMO ID: 68

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

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

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

ANALYSES REQUESTED

SAMPLE ID	DATE SAMPLED	TIME SAMPLED	SAMPLE DESCRIPTION	MATRIX: WATER	SOIL	SLUDGE	OTHER	TAT	CONTAINER: #	TYPE	TDS	SAMPLE CONDITIONS/ CONTAINER/COMMENTS
	3/10/25	0815	COOLING TOWER BLOWDOWN	X				N	1	P	X	

Relinquished by (Signature& Name): MA Received by (Signature & Name): E Jon Barie Date: 3-10-25 Time: 0915

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

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

SAMPLE DISPOSITION

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

By: _____ Date: _____

SPECIAL INSTRUCTION:

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

Arrived at the lab 3/10/25 1057

OBSERV. TEMP: _____°C
CORREC. TEMP: _____°C
THERMO ID: _____ BY: _____

POSITIVE
LAB SERVICE

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

March 25, 2025

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

Report No.: 2503216
Project Name: Malburg Generating Station Weekly

Dear Matt Richards,

This report contains the analytical results for the sample(s) received under chain of custody(s) by Positive Lab Service on March 18, 2025.

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

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

Rick Owen Parker
Project Manager

POSITIVE LAB SERVICE

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

Certificate of Analysis

City of Vernon
4963 Soto St.
Vernon, CA 90058

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

File #:74548
Report Date: 03/25/25
Submitted: 03/18/25
PLS Report No.: 2503216

Project: Malburg Generating Station Weekly

Sample ID: Cooling Tower Blowdown Water (2503216-01) Sampled: 03/18/25 08:25 Received: 03/18/25

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
Total Dissolved Solids	**4190**		1	mg/L	5.0	- SM 2540C	03/18/25	03/19/25	ss	BC51913

Quality Control Data

Analyte	Result	PQL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifier
Batch BC51913 - -										
Blank	**Prepared: 03/18/25 Analyzed: 03/19/25**									
Total Dissolved Solids	ND	5.0	mg/L							
LCS	**Prepared: 03/18/25 Analyzed: 03/19/25**									
Total Dissolved Solids	56.0	5.0	mg/L	50.0		112	80-120			
Duplicate **Source: 2503227-01**	**Prepared: 03/18/25 Analyzed: 03/19/25**									
Total Dissolved Solids	10.0	5.0	mg/L		10.0			0.00	5	

Notes and Definitions

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

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

Rick Owen Parker

Authorized Signature(s)

CHAIN OF CUSTODY AND ANALYSIS REQUEST

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

DATE: 3/18/25 PAGE: 1 OF 1

FILE NO.: LAB NO.: 2503216

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

ADDRESS: 4963 SOTO ST. VERNON CA 90058 ANALYSES REQUESTED OBSERVED TEMP 0.5°C

PROJECT MANAGER MATT RICHARDS PHONE NO: FAX NO: CORRECTED TEMP: 1.5°C

SAMPLER NAME: JOHN BARIE SIGNATURE: THERMO ID: 67

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

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

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

SAMPLE ID	DATE SAMPLED	TIME SAMPLED	SAMPLE DESCRIPTION	MATRIX				TAT	CONTAINER		TDS								SAMPLE CONDITIONS/ CONTAINER/COMMENTS
				WATER	SOIL	SLUDGE	OTHER		#	TYPE									
	3/18/25	0825	COOLING TOWER BLOWDOWN	X				N	1	P	X								

Relinquished by (Signature& Name): NA Received by (Signature & Name): Date: 3/18/25 Time: 0830 0825

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

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

SAMPLE DISPOSITION

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

By: _____ Date: _____

SPECIAL INSTRUCTION:

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

Arrived at the lab 3-18-25 1053

POSITIVE LAB SERVICE

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

March 31, 2025

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

Report No.: 2503308
Project Name: Malburg Generating Station Weekly

Dear Matt Richards,

This report contains the analytical results for the sample(s) received under chain of custody(s) by Positive Lab Service on March 24, 2025.

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

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

Project Manager

POSITIVE LAB SERVICE

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

Certificate of Analysis

City of Vernon
4963 Soto St.
Vernon, CA 90058

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

File #:74548
Report Date: 03/31/25
Submitted: 03/24/25
PLS Report No.: 2503308

Project: Malburg Generating Station Weekly

Sample ID: Cooling Tower Blowdown Water (2503308-01) Sampled: 03/24/25 09:05 Received: 03/24/25

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
Total Dissolved Solids	**4160**		1	mg/L	5.0	- SM 2540C	03/28/25	03/28/25	ss	BC52827

Quality Control Data

Analyte	Result	PQL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifier
Batch BC52827 - -										
Blank	**Prepared & Analyzed: 03/28/25**									
Total Dissolved Solids	ND	5.0	mg/L							
LCS	**Prepared & Analyzed: 03/28/25**									
Total Dissolved Solids	51.0	5.0	mg/L	50.0		102	80-120			
Duplicate **Source: 2503308-01**	**Prepared & Analyzed: 03/28/25**									
Total Dissolved Solids	4160	5.0	mg/L		4160			0.120	5	

Notes and Definitions

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

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

Rick Owen Parlin

Authorized Signature(s)

POSITIVE LAB SERVICE

CHAIN OF CUSTODY AND ANALYSIS REQUEST

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

DATE: 3-24-25 PAGE: 1 OF 1

FILE NO.: LAB NO.: 2503308

CLIENT NAME: CITY OF VERNON	PROJECT NAME/NO. MALBURG GENERATING STATION WEEKLY
P.O.NO.	AIRBILL NO:
ADDRESS: 4963 SOTO ST. VERNON CA 90058	OBSERVED TEMP 0.0°c
PROJECT MANAGER MATT RICHARDS	PHONE NO: FAX NO:
CORRECTED TEMP: 1.0°c	
SAMPLER NAME: JOHN BARIE	SIGNATURE:
THERMO ID: 67	

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

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

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

ANALYSES REQUESTED

SAMPLE ID	DATE SAMPLED	TIME SAMPLED	SAMPLE DESCRIPTION	MATRIX: WATER	SOIL	SLUDGE	OTHER	TAT	CONTAINER #	TYPE	TDS								SAMPLE CONDITIONS/ CONTAINER/COMMENTS
	3-24-25	0755	COOLING TOWER BLOWDOWN	X				N	1	P	X								

Relinquished by (Signature& Name):	Received by (Signature & Name):	Date:	Time:
MA	John Barie	3-24-25	0900
Relinquished by (Signature& Name):	Received by (Signature & Name):	Date:	Time:
Relinquished by (Signature& Name):	Received by (Signature & Name):	Date:	Time:

SAMPLE DISPOSITION

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

By: ____________ Date: ____________

SPECIAL INSTRUCTION:

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

Arrived at the lab 3-24-25 0900

POSITIVE
LAB SERVICE

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

April 04, 2025

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

Report No.: 2504010
Project Name: Malburg Generating Station Weekly

Dear Matt Richards,

This report contains the analytical results for the sample(s) received under chain of custody(s) by Positive Lab Service on April 02, 2025.

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

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

Project Manager

POSITIVE LAB SERVICE

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

Certificate of Analysis

City of Vernon
4963 Soto St.
Vernon, CA 90058

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

File #:74548
Report Date: 04/04/25
Submitted: 04/02/25
PLS Report No.: 2504010

Project: Malburg Generating Station Weekly

Sample ID: Cooling Tower Blowdown Water (2504010-01) Sampled: 04/02/25 08:15 Received: 04/02/25

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
Total Dissolved Solids	**4120**		1	mg/L	5.0	- SM 2540C	04/02/25	04/03/25	ss	BD50318

Quality Control Data

Analyte	Result	PQL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifier
Batch BD50318 - -										
Blank	**Prepared: 04/02/25 Analyzed: 04/03/25**									
Total Dissolved Solids	ND	5.0	mg/L							
LCS	**Prepared: 04/02/25 Analyzed: 04/03/25**									
Total Dissolved Solids	42.0	5.0	mg/L	50.0		84.0	80-120			
Duplicate **Source: 2504010-01**	**Prepared: 04/02/25 Analyzed: 04/03/25**									
Total Dissolved Solids	4170	5.0	mg/L		4120			1.13	5	

Notes and Definitions

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

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

Rick Owen Parker

Authorized Signature(s)

CHAIN OF CUSTODY AND ANALYSIS REQUEST

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

DATE: 4.22.25 PAGE: 1 OF 1

FILE NO.: LAB NO.: 2504010

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

ADDRESS: 4963 SOTO ST. VERNON CA 90058 ANALYSES REQUESTED OBSERVED TEMP 0.5°C

PROJECT MANAGER MATT RICHARDS PHONE NO: FAX NO: CORRECTED TEMP: 1.5°C

SAMPLER NAME: JOHN BARIE SIGNATURE: THERMO ID: 60

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

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

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

SAMPLE ID	DATE SAMPLED	TIME SAMPLED	SAMPLE DESCRIPTION	MATRIX				TAT	CONTAINER		TDS								SAMPLE CONDITIONS/ CONTAINER/COMMENTS
				WATER	SOIL	SLUDGE	OTHER		#	TYPE									
	4.22.25	0815	COOLING TOWER BLOWDOWN	X				N	1	P	X								

Relinquished by (Signature& Name): MA Received by (Signature & Name): John Barie Date: 4.22.25 Time: 0815

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

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

SAMPLE DISPOSITION

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

By: _____ Date: _____

SPECIAL INSTRUCTION:

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

Arrived at the lab 4.22.25 1315

Appendix C
Operation Logs

Malburg Generating Station
Appendix C, Table 1
Combustion Turbine Generator (CTG) Startup and Shutdown Events
During Quarter 1, 2025

CTG 1

Date	Event Type [1]	Event Start	Event End	Duration (hrs:min)
1/6/2025	Cold Start	14:44	16:02	1:18
1/7/2025	Stop	20:57	21:05	0:08
2/6/2025 [2]	Cold Start	11:13	12:40	1:27
2/13/2025	Trip/Shutdown	22:19	22:19	0:00
2/14/2025	Hot Start	02:18	03:33	1:15
3/28/2025	Stop	07:56	08:05	0:09
3/31/2025	Cold Start	13:17	14:35	1:18

CTG 2

Date	Event Type [1]	Event Start	Event End	Duration (hrs:min)
1/2/2025	Cold Start	16:18	17:59	1:41
1/28/2025	Trip/Shutdown	10:04	10:04	0:00
1/28/2025	Hot Start	10:59	11:38	0:39
2/6/2025	Stop	12:23	12:31	0:08
2/11/2025	Cold Start	16:51	18:08	1:17
2/14/2025	Stop	20:57	21:05	0:08
3/11/2025	Cold Start	04:41	06:03	1:22
3/14/2025	Stop	20:56	21:04	0:08
3/28/2025	Cold Start	04:41	06:00	1:19
3/31/2025	Stop	14:23	14:32	0:09

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

[2] Note that this cold start included an attempted start/trip at 07:19 due to the Fuel Gas POV being in the wrong position. The additional time in which the unit was online during the start/trip did not contribute to an exceedance of the unit's startup duration or emission limits.

Malburg Generating Station
Appendix C, Table 2
Diesel Firewater Pump Testing Times
During Quarter 1, 2025

Date	Time (hh:mm)	Start Hours	End Hours	Event Type	Hours of Operation
1/7/2025	8:00	407.6	408.1	Testing	0.5
1/14/2025	7:51	408.1	408.6	Testing	0.5
1/21/2025 [1]	8:06	408.6	409.1	Testing	0.6
1/29/2025	9:11	409.2	409.6	Testing	0.4
2/4/2025 [2]	12:33	409.6	410.2	Testing	5.6
2/11/2025	7:47	415.2	415.7	Testing	0.5
2/18/2025	8:55	415.7	416.2	Testing	0.5
2/25/2025	9:52	416.2	416.8	Testing	0.6
3/4/2025	12:38	416.8	417.3	Testing	0.5
3/11/2025	13:38	417.3	417.8	Testing	0.5
3/18/2025	10:57	417.8	418.3	Testing	0.5
3/25/2025	14:15	418.3	418.8	Testing	0.5

[1] Engine was briefly test started following preventative maintenance. Extra runtime reflected in starting read for January 29, 2025.

[2] Engine restarted inadvertantely following normal weekly test, and ran for an extra 5 hours before being stopped. Extra runtime reflected in starting read for February 11, 2025.

Appendix D
Diesel Fuel Oil Purchase Records

SC FUELS

SALES ORDER/DELIVERY TICKET

ORDER NUMBER: **OD-0000163065**

TERMS **NET 30 DAYS**
SALES REP: **TODD CRIPPS**
PHONE: **(714) 938-5714**
PO# **250060**
SCHEDULED DELIVERY FROM: **03/18/2025 12:00AM**
SCHEDULED DELIVERY TO:
ROM:
SHIP VIA: **SC COMMERCIAL (LUBES)**
WHSE **WH - SANTA FE SPRINGS**

SC Commercial, LLC, DBA SC Fuels
PO BOX 14237
ORANGE, CA 92863-1237
(888) 723-8357

PLEASE REMIT ALL PAYMENTS TO:
PO BOX 14237
ORANGE, CA 92863-1237

ACCT NO (Bill-to) 10001045

CITY OF VERNON
4305 SANTA FE AVE
ATTN: DEPARTMENT D
Los Angeles, CA 90058

ACCT NO (Ship-to) 220001

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

HM	ITEM CODE	ITEM DESCRIPTION	QTY ORDERED	QTY DEL	PACKAGE DESC	EXTENDED QTY
		O:TODD/POC:ROB 323-583-8811 X257/HRS:8A-2P				
		MTO				
		R99 RENEWABLE DSL DYED	2.00		55 GAL DRUM	110.00 GALS
X		**UN1202 (NA1993), DIESEL FUEL, 3,PG III - 15PPM OR LESS SULFUR. CARB DYED DIESEL. NONTAXABLE USE ONLY, PENALITY FOR TAXABLE USE MAY CONTAIN UP TO 5% BIODIESEL.**				
	250054981	CH GST ADVANTAGE EP 32	1.00		55 GAL DRUM	55.00 GALS
	DRUMDEPOSIT	DRUM DEPOSIT	3.00			3.00
	RCF LUBES	REG COMPLIANCE FEE LUBES	1.00			1.00
	FSC LUBES	FUEL SURCHARGE LUBES	1.00			1.00

www.SCFuels.com "Your Single Choice for Petroleum Products"
24-HOUR EMERGENCY RESPONSE CALL CHEMTREC 1-800-424-9300

Received by	customer signature	Date:	3/17/25	Arrived Destination	1:24	AM PM
Printed Name	customer first and last name			Completed	1:30	AM PM
Driver's Signature				Truck #	924	
				Drum Credit		

FOR CHEMICAL EMERGENCY

THIS IS TO CERTIFY THAT THE ABOVE NAME MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED AND LABELED AND ARE IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION

Appendix E
Excess Emission Reports

Startup/Shutdown Excess Emissions Report

U1 CO Startup/Shutdown

From: 01/01/2025 00:00 **To:** 03/31/2025 23:59 **Facility Name:** Malburg Generating Station

Generated: 04/09/2025 15:13 **Location:** Vernon, California

Tag Name: U1_CO_LbPerHr_1M

SI = SampleInvalid, * = Excess Emission

Total Operating Time: 1,232.03 Hours

Non-Operating Time: 927.97 Hours Report Time: 2,160.00 Hours

Unit Operation

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

No excess emissions were found in the reporting period.

Startup/Shutdown Excess Emissions Report

U1 CO Startup/Shutdown

From: 01/01/2025 00:00 **To:** 03/31/2025 23:59 **Facility Name:** Malburg Generating Station

Generated: 04/09/2025 15:13 **Location:** Vernon, California

Tag Name: U1_CO_LbPerHr_1M SI = SampleInvalid, * = Excess Emission

Total Operating Time: 1,232.03 Hours

Non-Operating Time: 927.97 Hours Report Time: 2,160.00 Hours

No invalid events were found in the reporting period.

Startup/Shutdown Excess Emissions Report

U1 NOx Startup/Shutdown

From: 01/01/2025 00:00 **To:** 03/31/2025 23:59 **Facility Name:** Malburg Generating Station

Generated: 04/09/2025 15:14 **Location:** Vernon, California

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

Total Operating Time: 1,232.03 Hours

Non-Operating Time: 927.97 Hours Report Time: 2,160.00 Hours

Unit Operation

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

No excess emissions were found in the reporting period.

Startup/Shutdown Excess Emissions Report

U1 NOx Startup/Shutdown

From: 01/01/2025 00:00 **To:** 03/31/2025 23:59 **Facility Name:** Malburg Generating Station

Generated: 04/09/2025 15:14 **Location:** Vernon, California

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

Total Operating Time: 1,232.03 Hours

Non-Operating Time: 927.97 Hours Report Time: 2,160.00 Hours

No invalid events were found in the reporting period.

Startup/Shutdown Excess Emissions Report

U1 VOC Startup/Shutdown

From: 01/01/2025 00:00 **To:** 03/31/2025 23:59 **Facility Name:** Malburg Generating Station
Generated: 04/09/2025 15:15 **Location:** Vernon, California
Tag Name: U1_VOC_LbPerHr_1M
SI = SampleInvalid, * = Excess Emission

Total Operating Time: 1,232.03 Hours
Non-Operating Time: 927.97 Hours Report Time: 2,160.00 Hours

Unit Operation

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

No excess emissions were found in the reporting period.

Startup/Shutdown Excess Emissions Report

U1 VOC Startup/Shutdown

From: 01/01/2025 00:00 **To:** 03/31/2025 23:59 **Facility Name:** Malburg Generating Station

Generated: 04/09/2025 15:15 **Location:** Vernon, California

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

Total Operating Time: 1,232.03 Hours

Non-Operating Time: 927.97 Hours Report Time: 2,160.00 Hours

No invalid events were found in the reporting period.

Excess Emission Report

Unit 1 - CO ppmvdc 1-hour during Normal Operation

From: 01/01/2025 00:00 **To:** 03/31/2025 23:59 **Facility Name:** Malburg Generating Station
Generated: 04/09/2025 15:15 **Location:** Vernon, California

Tag Name: U1_CONormal_Ppmvdc_1H
Total Operating Time: 1,237.00 Hour(s) **No Exclusions Allowed**
Non-Operating Time: 923.00 Hour(s) Report Time: 2,160.00 Hour(s)

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

Total Operating Time:	**1,237.00 Hour(s)**
Total Duration (Online only):	**0.00 Hour(s)**
Time in exceedance as a percentage of operating time:	**0.00 %**
Time in compliance as a percentage of operating time:	**100.00 %**

Excess Emission Report

Unit 1 - NOx ppmvdc 1-hour during Normal Operation

From: 01/01/2025 00:00 **To:** 03/31/2025 23:59 **Facility Name:** Malburg Generating Station

Generated: 04/09/2025 15:16 **Location:** Vernon, California

Tag Name: U1_NOxNormal_Ppmvdc_1H

Total Operating Time: 1,237.00 Hour(s) **No Exclusions Allowed**

Non-Operating Time: 923.00 Hour(s) Report Time: 2,160.00 Hour(s)

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

Total Operating Time:	**1,237.00 Hour(s)**
Total Duration (Online only):	**0.00 Hour(s)**
Time in exceedance as a percentage of operating time:	**0.00 %**
Time in compliance as a percentage of operating time:	**100.00 %**

Excess Emission Report

Unit 1 - VOC ppmvdc 1-hour during Normal Operation

From: 01/01/2025 00:00 **To:** 03/31/2025 23:59 **Facility Name:** Malburg Generating Station

Generated: 04/09/2025 15:16 **Location:** Vernon, California

Tag Name: U1_VOCNormal_Ppmvdc_1H

Total Operating Time: 1,237.00 Hour(s) **No Exclusions Allowed**

Non-Operating Time: 923.00 Hour(s) Report Time: 2,160.00 Hour(s)

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

Total Operating Time:	**1,237.00 Hour(s)**
Total Duration (Online only):	**0.00 Hour(s)**
Time in exceedance as a percentage of operating time:	**0.00 %**
Time in compliance as a percentage of operating time:	**100.00 %**

Excess Emission Report

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

From: 01/01/2025 00:00 **To:** 03/31/2025 23:59 **Facility Name:** Malburg Generating Station
Generated: 04/09/2025 15:21 **Location:** Vernon, California

Tag Name: U1_CO_3HrRoll_Ppmvdc_1H
Total Operating Time: 1,237.00 Hour(s) **No Exclusions Allowed**
Non-Operating Time: 923.00 Hour(s) Report Time: 2,160.00 Hour(s)

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

Total Operating Time:	**1,237.00 Hour(s)**
Total Duration (Online only):	**0.00 Hour(s)**
Time in exceedance as a percentage of operating time:	**0.00 %**
Time in compliance as a percentage of operating time:	**100.00 %**

Quad K Excess Emissions Report

U1 NOX 4-Hour Events

From: 01/01/2025 00:00 **To:** 03/31/2025 23:59 **Facility Name:** Malburg Generating Station
Generated: 04/09/2025 15:22 **Location:** Vernon, California

Tag Name: U1_NOx4H_Ppmvdc_1H
Total Operating Time: 1,237.00 Hour(s) **No Exclusions Allowed**
Non-Operating Time: 923.00 Hour(s) Report Time: 2,160.00 Hour(s)

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

Total Operating Time:	**1,237.00 Hour(s)**
Total Duration (Online only):	**0.00 Hour(s)**
Time in exceedance as a percentage of operating time:	**0.00 %**
Time in compliance as a percentage of operating time:	**100.00 %**

Startup/Shutdown Event Report

U2 CO Startup/Shutdown Events

From: 01/01/2025 00:00 **To:** 03/31/2025 23:59 **Facility Name:** Malburg Generating Station

Generated: 04/09/2025 15:24 **Location:** Vernon, California

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

Total Operating Time: 1,081.85 Hours

Non-Operating Time: 1,078.15 Hours Report Time: 2,160.00 Hours

Unit Operation

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

No excess emissions were found in the reporting period.

Startup/Shutdown Event Report

U2 CO Startup/Shutdown Events

From: 01/01/2025 00:00 **To:** 03/31/2025 23:59 **Facility Name:** Malburg Generating Station
Generated: 04/09/2025 15:24 **Location:** Vernon, California
Tag Name: U2_CO_LbPerHr_1M SI = SampleInvalid, * = Excess Emission

Total Operating Time: 1,081.85 Hours
Non-Operating Time: 1,078.15 Hours Report Time: 2,160.00 Hours

No invalid events were found in the reporting period.

Startup/Shutdown Excess Emissions Report

U2 NOx Startup/Shutdown

From: 01/01/2025 00:00 **To:** 03/31/2025 23:59 **Facility Name:** Malburg Generating Station

Generated: 04/09/2025 15:24 **Location:** Vernon, California

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

Total Operating Time: 1,081.85 Hours

Non-Operating Time: 1,078.15 Hours Report Time: 2,160.00 Hours

Unit Operation

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

No excess emissions were found in the reporting period.

Startup/Shutdown Excess Emissions Report

U2 NOx Startup/Shutdown

From: 01/01/2025 00:00 **To:** 03/31/2025 23:59 **Facility Name:** Malburg Generating Station

Generated: 04/09/2025 15:24 **Location:** Vernon, California

Tag Name: U2_NOxRECLM_LbPerHr_1M

SI = SampleInvalid, * = Excess Emission

Total Operating Time: 1,081.85 Hours

Non-Operating Time: 1,078.15 Hours Report Time: 2,160.00 Hours

No invalid events were found in the reporting period.

Startup/Shutdown Event Report

U2 VOC Startup/Shutdown Events

From: 01/01/2025 00:00 **To:** 03/31/2025 23:59 **Facility Name:** Malburg Generating Station
Generated: 04/09/2025 15:25 **Location:** Vernon, California
Tag Name: U2_VOC_LbPerHr_1M
SI = SampleInvalid, * = Excess Emission

Total Operating Time: 1,081.85 Hours
Non-Operating Time: 1,078.15 Hours Report Time: 2,160.00 Hours

Unit Operation

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

No excess emissions were found in the reporting period.

Startup/Shutdown Event Report

U2 VOC Startup/Shutdown Events

From: 01/01/2025 00:00 **To:** 03/31/2025 23:59 **Facility Name:** Malburg Generating Station
Generated: 04/09/2025 15:25 **Location:** Vernon, California
Tag Name: U2_VOC_LbPerHr_1M SI = SampleInvalid, * = Excess Emission
Total Operating Time: 1,081.85 Hours
Non-Operating Time: 1,078.15 Hours Report Time: 2,160.00 Hours

No invalid events were found in the reporting period.

Excess Emission Report

Unit 2 - CO ppmvdc 1-hour during Normal Operation

From: 01/01/2025 00:00 **To:** 03/31/2025 23:59 **Facility Name:** Malburg Generating Station
Generated: 04/09/2025 15:26 **Location:** Vernon, California

Tag Name: U2_CONormal_Ppmvdc_1H
Total Operating Time: 1,088.00 Hour(s) **No Exclusions Allowed**
Non-Operating Time: 1,072.00 Hour(s) Report Time: 2,160.00 Hour(s)

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

Total Operating Time:	**1,088.00 Hour(s)**
Total Duration (Online only):	**0.00 Hour(s)**
Time in exceedance as a percentage of operating time:	**0.00 %**
Time in compliance as a percentage of operating time:	**100.00 %**

Excess Emission Report

Unit 2 - NOx ppmvdc 1-hour during Normal Operation

From: 01/01/2025 00:00 **To:** 03/31/2025 23:59 **Facility Name:** Malburg Generating Station
Generated: 04/09/2025 15:27 **Location:** Vernon, California

Tag Name: U2_NOxNormal_Ppmvdc_1H
Total Operating Time: 1,088.00 Hour(s) **No Exclusions Allowed**
Non-Operating Time: 1,072.00 Hour(s) Report Time: 2,160.00 Hour(s)

Inc No	Start Time	End Time	Duration in Hour(s)	Average	Limit	Maximum	Reason Code	Action Code
1	03/31/25 11:00	03/31/25 11:59	1	3.8	2.0	3.8		

Total Operating Time:	**1,088.00 Hour(s)**
Total Duration (Online only):	**1.00 Hour(s)**
Time in exceedance as a percentage of operating time:	**0.09 %**
Time in compliance as a percentage of operating time:	**99.91 %**

Excess Emission Report

Unit 2 - VOC ppmvdc 1-hour during Normal Operation

From: 01/01/2025 00:00 **To:** 03/31/2025 23:59 **Facility Name:** Malburg Generating Station
Generated: 04/09/2025 15:30 **Location:** Vernon, California

Tag Name: U2_VOCNormal_Ppmvdc_1H
Total Operating Time: 1,088.00 Hour(s) **No Exclusions Allowed**
Non-Operating Time: 1,072.00 Hour(s) Report Time: 2,160.00 Hour(s)

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

Total Operating Time:	**1,088.00 Hour(s)**
Total Duration (Online only):	**0.00 Hour(s)**
Time in exceedance as a percentage of operating time:	**0.00 %**
Time in compliance as a percentage of operating time:	**100.00 %**

Excess Emission Report

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

From: 01/01/2025 00:00 **To:** 03/31/2025 23:59 **Facility Name:** Malburg Generating Station
Generated: 04/09/2025 15:31 **Location:** Vernon, California

Tag Name: U2_CO_3HrRoll_Ppmvdc_1H
Total Operating Time: 1,088.00 Hour(s) **No Exclusions Allowed**
Non-Operating Time: 1,072.00 Hour(s) Report Time: 2,160.00 Hour(s)

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

Total Operating Time:	**1,088.00 Hour(s)**
Total Duration (Online only):	**0.00 Hour(s)**
Time in exceedance as a percentage of operating time:	**0.00 %**
Time in compliance as a percentage of operating time:	**100.00 %**

Quad K Excess Emissions Report

U2 NOX 4-Hour Events

From: 01/01/2025 00:00 **To:** 03/31/2025 23:59 **Facility Name:** Malburg Generating Station
Generated: 04/09/2025 15:31 **Location:** Vernon, California

Tag Name: U2_NOx4H_Ppmvdc_1H
Total Operating Time: 1,088.00 Hour(s) **No Exclusions Allowed**
Non-Operating Time: 1,072.00 Hour(s) Report Time: 2,160.00 Hour(s)

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

Total Operating Time:	**1,088.00 Hour(s)**
Total Duration (Online only):	**0.00 Hour(s)**
Time in exceedance as a percentage of operating time:	**0.00 %**
Time in compliance as a percentage of operating time:	**100.00 %**

Appendix F
NOx Excess Emissions Supporting Documentation

City of VERNON CALIFORNIA

April 15, 2025

NOTICE OF INTENT TO FILE
Form 500-N for Breakdown Event on 03/31/2025
Vernon Public Utilities, SCAQMD Facility ID 195802

Dear Mr. Plascencia:

Attached is Form 500-N for a March 31, 2025 breakdown event resulting in excess emissions of nitrogen oxides (NO_x) at Vernon Public Utilities (VPU), Facility ID 195802. Supporting documentation is also provided, where warranted.

Currently, the root cause of the incident is still under investigation. This breakdown required verbal notification to the South Coast Air Quality Management District (SCAQMD) within 1 hour. As soon as the site personnel mitigated excess emissions, they notified Jacobs, VPU's environmental consultant, of the event and provided details at 01:17 PM. Jacobs confirmed it was an excess emissions event due to a breakdown and notified SCAQMD at 01:37 PM.

Please contact Matt Richards at (323) 583-8811 ext. 378 (email address: MRichards@cityofvernonca.gov) or Elyse Engel at (702) 354-2648 (email address: elyse.engel@jacobs.com) if you have any questions or if you need additional information.

Sincerely,

Todd Dusenberry
General Manager of Vernon Public Utilities

Cc: Lisa Umeda
Matt Richards
Richard Corbi
Adriano Marki
Michael Bonfiglio
Elyse Engel
Sarah Jensen
Document Control

Encl: Form 500-N
Attachment A – Additional Form 500-N Descriptions
Attachment B – Calculated Excess Emissions
Attachment C – Gas Turbine No. 2 Swing Trends
Attachment D – 1-Minute Data Report
Attachment E – Compliance Demonstration

South Coast Air Quality Management District

Form 500-N

Title V - Deviations, Emergencies & Breakdowns

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

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

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

Section I - Operator Information

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

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

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

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

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

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

Section II - Reporting of Breakdowns, Deviations, and Emergencies

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

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

2. **The incident was first discovered by:** Matt Richards (Name) **on** 03/31/2025 (Date) 01:17 (Time) ○ AM ◉ PM

3. **The incident was first reported by:** Automated Message Service (Name of AQMD Staff Person) **on** 03/31/2025 (Date) 01:37 (Time) ○ AM ◉ PM

   a. ◉ Via Phone

   b. ○ In Person

   Notification Number (Required): 833761

4. **When did the incident actually occur?** 03/31/2025 (Date) 12:12 (Time) ○ AM ◉ PM

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

5. Has the incident stopped? a. (•) Yes, on: 03/31/2025 (Date) 12:47 (Time) ( ) AM (•) PM b. ( ) No

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

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

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

See attachment A

9. The incident may have resulted in a:

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

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

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

The root cause is still under investigation.

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

[ ] VOC _____ lbs [X] NOx 2.030 lbs [ ] SOx _____ lbs [ ] H2S _____ lbs

[ ] CO _____ lbs [ ] PM _____ lbs [ ] Other: _____ lbs _____ pollutant

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

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

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

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

See Attachment A.

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

a. (•) Yes b. ( ) No, because: _____

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

a. ( ) Yes b. (•) No, because: See Attachment A.

16. Has the facility returned to compliance?

a. ( ) No, because: _____

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

Section III - Certification Statement

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

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

1. Signature of Responsible Official:	2. Title of Responsible Official:
	General Manager of Vernon Public Utilities
3. Print Name: Todd Dusenberry	4. Date: 4-16-25
5. Phone #: (323) 583-8811	6. Fax #:

7. Address of Responsible Official:

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

Attachment A: Additional Form 500-N Descriptions

Attachment A: Additional Form 500-N Descriptions

This attachment presents additional information regarding the breakdown event which occurred on March 31, 2025, as prompted by Form 500-N.

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

On March 31, 2025 at 12:12 pm, Gas Turbine No. 2 (Device ID D36) experienced a drastic load swing for approximately three minutes and then again at 12:39 pm for approximately six minutes. In both cases, these drastic load swings triggered "Loss of load" events on the gas turbine control system. In response, the gas turbine control system automatically opened the pilot gas control valve from 30 percent to 100 percent to enact a "Pilot Fuel Ratio (PFR) recovery".[1] The high ratio of pilot gas to main gas caused by the fully-opened pilot gas control valve increased nitrogen oxides (NO_X) emissions to levels above the control/reduction capability of the Selective Catalytic Reduction (SCR) system, causing an exceedance of the 2.0 parts per million by volume, dry corrected (ppmvdc) NO_X emissions limit of Permit Condition No. A195.5 for the 12:00 pm hour (3.8 ppmvdc). The cause of the drastic load swing is still under investigation.

The Gas Turbine No. 2 (Device ID D36) NO_X emissions exceedance was determined following the end of the 12:00 pm hour and communicated to Jacobs, the site's environmental consultant, at 01:17 pm. Jacobs, on behalf of the site, made the required verbal notification to the South Coast Air Quality Management District (SCAQMD) at 1-800-288-7664 at 1:37 pm. The notification number for the incident is 833761. The operator number was not provided as a recording service is used on Mondays.

11. Did the incident result in excess emissions?

Yes. See **Attachment B** for calculated excess emissions of 2.03 pounds of NO_X.

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

During both incidents, site personnel worked immediately after discovery to manually drive the NO_X emissions as low as possible while trying to investigate the cause of the drastic load swings. However, due to the very high spike following the initial load swing, the Gas Turbine No. 2 (Device ID D36) NO_X hourly emissions were still greater than the permitted limit for the 12:00 pm hour. Although there were no similar drastic load swings following this hour (1:00 pm and

[1] PFR recovery is implemented to stabilize turbine combustion during fast load changes or actual measured combustion issues (e.g., pulsations).

onwards), site personnel quickly initiated a start-up sequence for Gas Turbine No. 1 to facilitate shutdown of Gas Turbine No. 2 without interrupting grid stability and committed dispatches. Gas Turbine No. 2 was officially shut down at 2:34 pm. These efforts minimized excess emissions to the extent feasible.

Prior to the incident, the electrical protection equipment was only set-up to record high resolution electrical data that could be used for troubleshooting whenever the gas turbines trips. As an investigatory measure, the settings were changed to also record data whenever there are large load swings like the ones caused by this incident. Control Room Operators have also been instructed to perform specific load changes using a modified procedure on each gas turbine to identify and/or prevent the cause from occurring again in the future. Concurrently, site personnel have been in touch with the turbine manufacturer (Siemens) as well as an electrical contractor to understand and hopefully identify the potential cause of the electrical disturbance. Although no final determination has yet been made, Siemens STG and CTG Hotline Engineers have ruled out a "mechanical" problem based on their not having found any sudden actions/movements or energy flow setpoints in the gas turbine control system that would explain the size or speed of the load oscillation.

Attachment C contains four graphs depicting the load swings during the malfunction and their impact on the pilot gas control valve's operation. These graphs are as follows: 1) Gas Turbine No. 2 electrical measurements showing the load swing, 2) Pilot Gas Control Valve opened to 100 percent and Main Gas Valve reduced opening to maintain a constant total gas flow, 3) 10-minute view of Gas Turbine No. 2 swinging active load and Plant Auxiliary Power Voltage and Current (External Grid), and 4) 1-hour view of Gas Turbine No. 2 swinging active load and Plant Auxiliary Power Voltage and Current (External Grid).

Attachment D contains the 1-minute data report demonstrating the site personnel's manual control to lower NO_X to minimize excess emissions during the 12:00 pm hour[2]. The report illustrates the NO_X ppmvdc increase after the load swings began at 12:12 pm (11:12 am on the report) and a second increase after the second time the pilot gas control valve fully opened around 12:40 pm (11:40 am on the report). The site personnel initiated the shutdown at 2:23 pm (13:23 pm on the report).

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

No. The incident is still under investigation but appears to have been caused by electrical disturbances external to Gas Turbine No. 2 (Device ID D36) and its associated equipment.

16. Has the facility returned to compliance?

[2] The Data Acquisition and Handling System (DAHS) does not adjust for daylight savings time. Therefore, there is a 1-hour lag on the attached DAHS printouts from actual times reported by the Control Room Operators.

As documented in Form 500-N, the facility returned to compliance after the pilot gas control valve returned to normal operation for the 1:00 pm hour (12:00 pm on **Attachment E**[2]). Demonstration of this return to compliance is provided in **Attachment E** in the form of hourly NO_X ppmvdc emission values before and after the event on March 31, 2025. Note that Gas Turbine No. 2 (Device ID D36) was shut down at 2:23 pm on March 31, 2025, and remained offline while preliminary investigations were conducted and preventative measures were identified and implemented. As of now, nothing appears to be wrong with Gas Turbine No. 2 itself such that the unit is considered available for operation with the above-identified preventative measures implemented.

Attachment B: Calculated Excess Emissions

Calculated Excess Emissions Due to Equipment Breakdown During 12:00 PM Hour on March 31, 2025

Emissions and NOx Concentrations:

	Actual Emissions	Emissions If 2.0 ppmvdc Limit Was Met	Excess Emissions
U2_NOxTotalRECLM_LbPerHr_1H	4.3	2.27	2.03
U2_NOxNormal_Ppmvdc_1H	3.8	2.00	

Actual Emissions for 12:00 PM Hour on March 31, 2025:

	U2_NOx_Ppmvdc_15M	U2_NOxRECLM_Ppm_15M	U2_StackFlowRECLM_scfh_15M	U2_NOxRECLM_LbPerHr_15M	U2_O2Dry_Pct_15M
3/31/2025 12:00	4.5	4.8	8937000	5.13	14.6
3/31/2025 12:15	6	6.4	8954000	6.85	14.6
3/31/2025 12:30	1.7	1.8	8903000	1.92	14.6
3/31/2025 12:45	2.9	3.1	8860000	3.28	14.6
Average for 1 Hour:	**3.8**	**4.0**	**8913500**	**4.30**	**14.6**

Emissions If 2.0 ppmvdc Hourly Limit Was Met:

	U2_NOx_Ppmvdc_15M	U2_NOxRECLM_Ppm_15M	U2_StackFlowRECLM_scfh_15M	U2_NOxRECLM_LbPerHr_15M	U2_O2Dry_Pct_15M
3/31/2025 12:00	2.1	2.2	8937000	2.39	14.6
3/31/2025 12:15	2.1	2.2	8954000	2.40	14.6
3/31/2025 12:30	1.7	1.8	8903000	1.92	14.6
3/31/2025 12:45	2.1	2.2	8860000	2.37	14.6
Average for 1 Hour:	**2.00**	**2.1**	**8913500**	**2.27**	**14.6**

Calculation Methodology For Hypothetical Compliant Emissions:

15-minute NOx RECLAIM Concentration (ppm; Tag: U2_NOxRECLM_Ppm_15M) = 15-minute NOx Concentration (ppmvdc; Tag: U2_NOx_Ppmvdc_15M) / (20.9 - % O2 Correction Factor [Tag: U2_O2_Correction_Pct]) x (20.9 - % O2 [Tag: U2_O2Dry_Pct_15M])

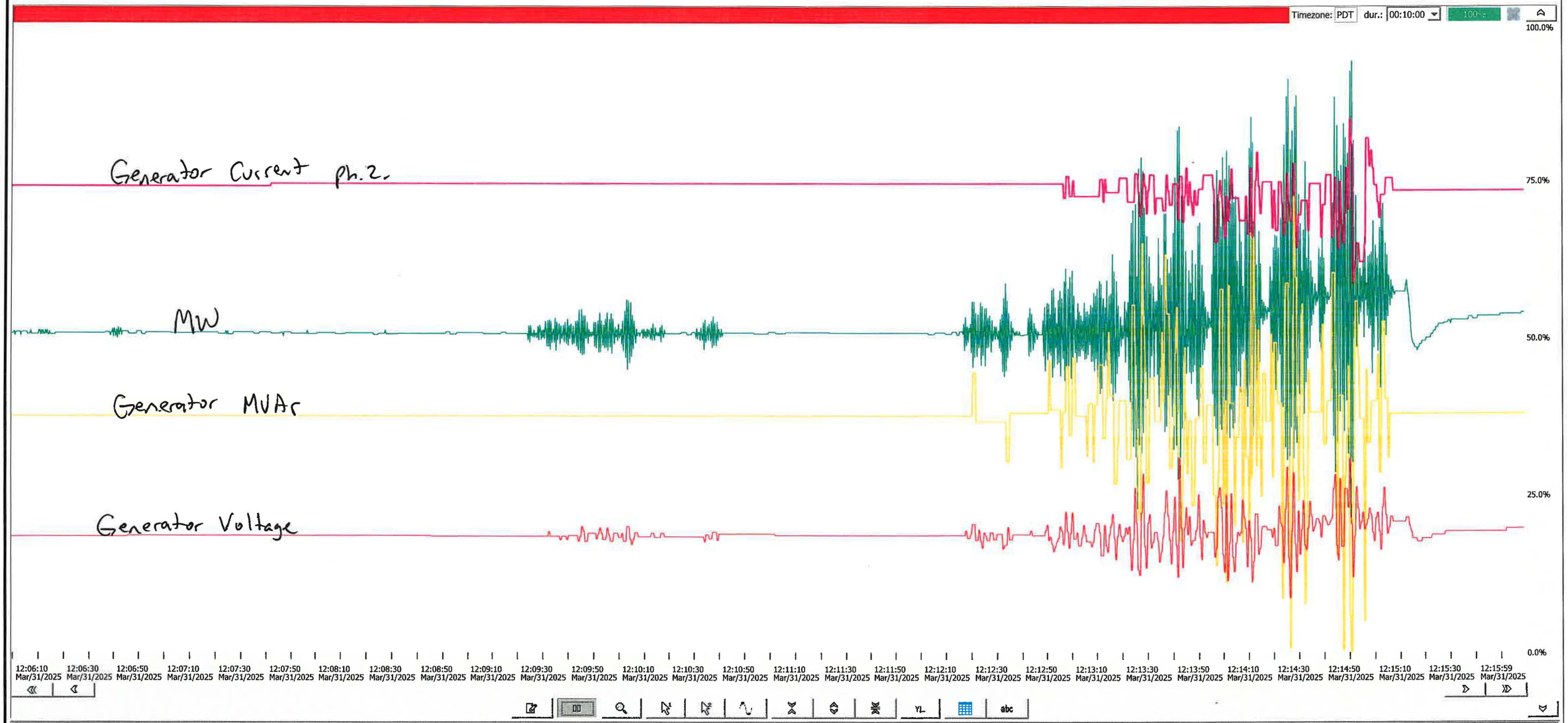
15-minute NOx Mass Emissions (lb/hr; Tag: U2_NOxRECLM_LbPerHr_15M) = 1.195 x 0.0000001 x 15-minute NOx RECLAIM Concentration (ppm; Tag: U2_NOxRECLM_Ppm_15M) x 15-minute Stack Flow (scfh; Tag: U2_StackFlowRECLM_scfh_15M) x Bias Correction (lb/hr; Tag: U2_NOxBias_LbPerHr)

Constants:

Conversion Factor	1.195
Conversion Factor	0.0000001
U2_NOxBias_LbPerHr	1
U2_NOxBias_ppm	1
U2_O2_Correction_Pct	15
Standard Atmospheric % O2	20.9

Attachment C: Gas Turbine No. 2 Swing Trends

CT2 Swinging 3/31/25 10 Min.

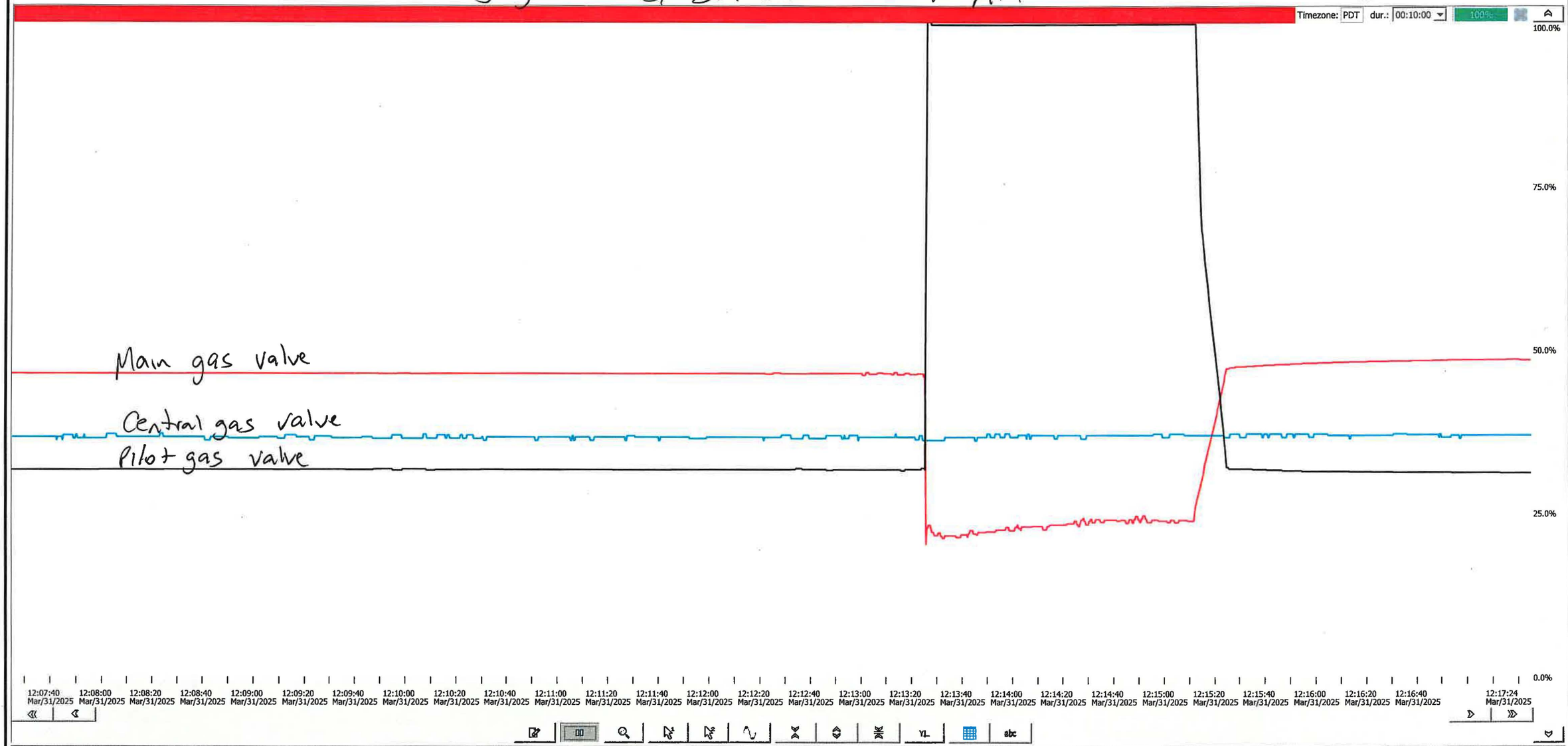


	SIGNAL TAG	DESIGNATION	RANGE LOW	RANGE HI	CURSOR 1	CURSOR 2	Y DIFF	UNIT	LAST
	2MBP10AA035||XQ01	Main Gas Control Valve Position	0.0000	100.0000				%	47.9058
	2MBP40AA005||XQ01	Central Gas Valve Position	0.0000	100.0000				%	37.0804
	2MBP20AA005||XQ01	Pilot Gas Control Valve Position	0.0000	100.0000				%	31.3404
	2CFA10CE001||XQ01	Active Load	0.0000	45.0000				MW	24.2725
	2MKA10CE007||XQ01	Generator Voltage L1-L2	12.5000	14.5000				kV	13.9670
	2MKY10CE031||XQ01	Generator Reactive Power	0.0000	8.0000				MVAR	3.0300
	2MKA10CE002||XQ01	Generator Current Phase L2	0.0000	5000				A	981.0001

		Date	16/11/30	05 Fuel System	= 2_05 FUEL SYSTEM
		Drawn By			+
		Checked By		Trend Display 2MBP10AA035|XQ01	Page 1
State	Change / Date / Editor	Standard		en	Pg. 1

03/31/2025 13:11:32

CT2 Swinging 3/31/25 10 Min.

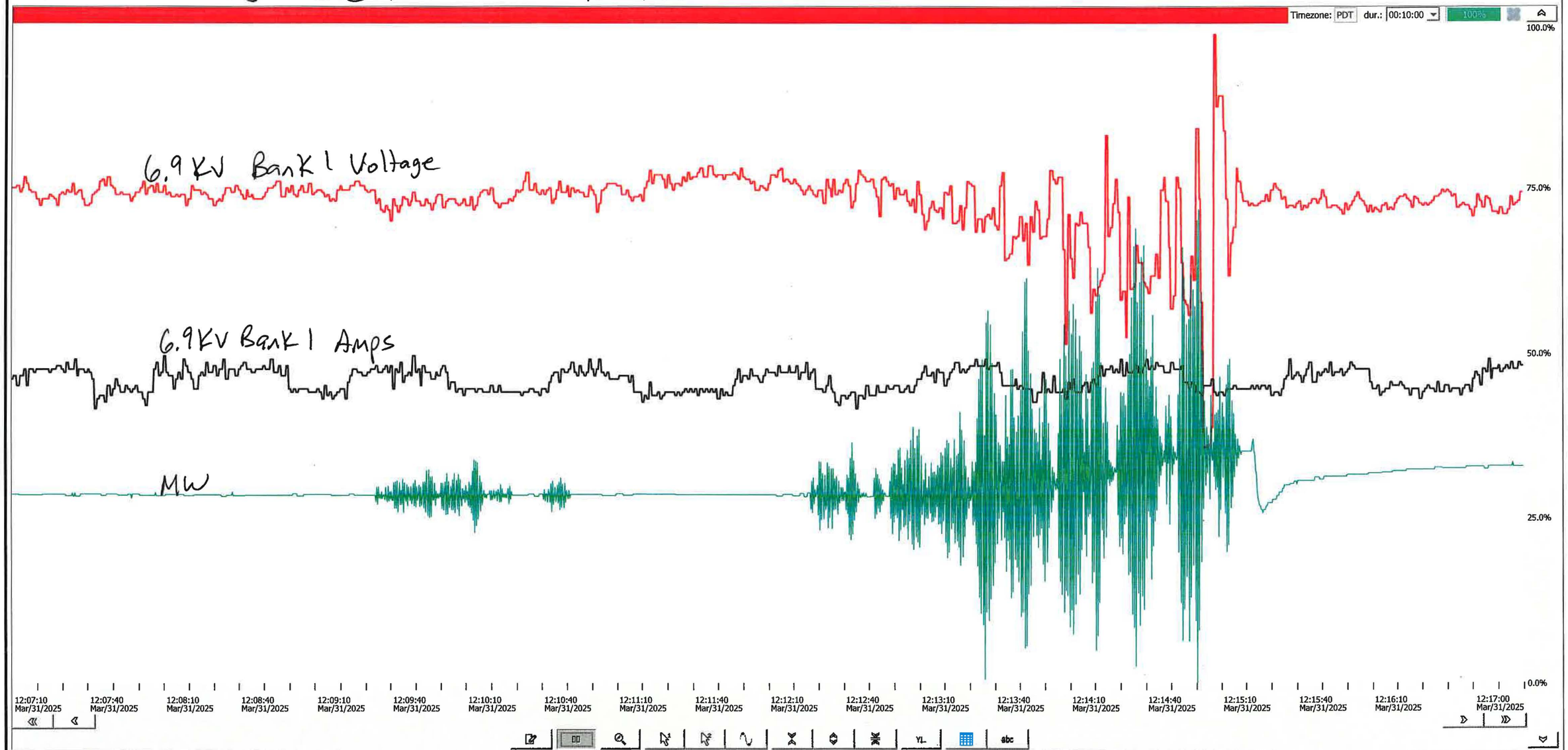


	SIGNAL TAG	DESIGNATION	RANGE LOW	RANGE HI	CURSOR 1	CURSOR 2	Y DIFF	UNIT	LAST
	2MBP10AA035||XQ01	Main Gas Control Valve Position	0.0000	100.0000				%	48.4013
	2MBP40AA005||XQ01	Central Gas Valve Position	0.0000	100.0000				%	36.8634
	2MBP20AA005||XQ01	Pilot Gas Control Valve Position	0.0000	100.0000				%	31.0981
	2CFA10CE001||XQ01	Active Load	0.0000	45.0000				MW	24.8993
	2MKA10CE007||XQ01	Generator Voltage L1-L2	12.5000	14.5000				kV	13.9532
	2MKY10CE031||XQ01	Generator Reactive Power	0.0000	8.0000				MVAR	3.0300

				Date	16/11/30	05 Fuel System	= 2_05 FUEL SYSTEM	
				Drawn By			+	
				Checked By		Trend Display 2MBP10AA035|XQ01	en	Page 1
State	Change	Date	Editor	Standard				Pg. 1

03/31/2025 12:31:36

CT2 Swing 3/31/25 10 Min.



	SIGNAL TAG	DESIGNATION	RANGE LOW	RANGE HI	CURSOR 1	CURSOR 2	Y DIFF	UNIT	LAST
	MM4110B.VLL_AVG||XQ01	Main 6900V Bus B _ L-L Voltage Phase Avg	6700	7000				V	6923
	MM4110B.I_AVG||XQ01	Main 6900V Bus B _ Average Current	100.0000	300.0000				A	196.0000
	2CFA10CE001||XQ01	Active Load	10.0000	55.0000				MW	24.7206

				Date	16/06/09				=	6.9KV-B
				Drawn By					+	
				Checked By						Page 1
State	Change	Date	Editor	Standard				en		Pg. 1

03/31/2025 15:01:13

Applications Favorites View Window Extras Mode Help

Things to watch | ASD (no status) | Reports - [Online] | 6.9KV-B

Min/Max

T...	SIGNAL TAG	MIN	TIME(MIN)	MAX	TIME(MAX)
	MM4110B.VLL_AVG|XQ01	6797	03/31/25 12:39:3...	6995	03/31/25 12:14:5...
	MM4110B.I_AVG|XQ01	182.0000	03/31/25 12:03:4...	200.0000	03/31/25 12:20:4...
	2CFA10CE001|XQ01	7.3233	03/31/25 12:42:2...	42.2642	03/31/25 12:14:5...

Close

Trend Display - MM4110B.VLL_AVG|XQ01

Timezone: PDT dur.: 01:00:00

6.9kv Bank 1 Voltage

6.9 KV Bank 1 Amps

MW

SIGNAL TAG	DESIGNATION	RANGE LOW	RANGE HI	CURSOR 1	CURSOR 2	Y DIFF	UNIT	LAST
MM4110B.VLL_AVG|XQ01	Main 6900V Bus B _ L-L Voltage Phase Avg	6700	7000				V	6906
MM4110B.I_AVG|XQ01	Main 6900V Bus B _ Average Current	100.0000	300.0000				A	194.0000
2CFA10CE001|XQ01	Active Load	10.0000	55.0000				MW	22.9247

Attachment D: 1-Minute Data Report

1-Minute Data Report

Unit 2 - NOx and CO

From: 03/31/2025 11:00 **To:** 03/31/2025 13:44 **Facility Name:** Malburg Generating Station

Generated: 04/09/2025 15:43 **Location:** Vernon, California

Red = Sample Invalid

Date/Time	Unit 2 O2, Dry, Pct 1 Minute(s)	Unit 2 NOx, Ppm 1 Minute(s)	Unit 2 NOx, Ppmvdc 1 Minute(s)	Unit 2 NOx, LbPerHr 1 Minute(s)	Unit 2 CO, Ppm 1 Minute(s)	Unit 2 CO, Ppmvdc 1 Minute(s)	Unit 2 CO, LbPerHr 1 Minute(s)	Unit 2 CTLoad, MWe 1 Minute(s)
03/31/2025 11:00	14.6	1.93	1.81	2.1	0.05	0.05	0.0	22.8
03/31/2025 11:01	14.6	1.92	1.80	2.1	0.08	0.07	0.1	22.9
03/31/2025 11:02	14.6	1.92	1.80	2.1	0.06	0.06	0.0	22.8
03/31/2025 11:03	14.6	1.92	1.80	2.1	0.01	0.01	0.0	22.9
03/31/2025 11:04	14.6	1.94	1.82	2.1	0.00	0.00	0.0	22.9
03/31/2025 11:05	14.6	1.94	1.82	2.1	0.02	0.02	0.0	22.6
03/31/2025 11:06	14.6	1.94	1.82	2.1	0.08	0.07	0.1	22.9
03/31/2025 11:07	14.5	1.94	1.79	2.1	-0.01	-0.01	0.0	22.8
03/31/2025 11:08	14.6	1.92	1.80	2.1	0.04	0.04	0.0	22.8
03/31/2025 11:09	14.6	1.92	1.80	2.1	0.04	0.04	0.0	22.9
03/31/2025 11:10	14.6	1.92	1.80	2.1	0.03	0.03	0.0	22.7
03/31/2025 11:11	14.6	1.93	1.81	2.1	0.04	0.04	0.0	22.8
03/31/2025 11:12	14.6	1.93	1.81	2.1	0.07	0.07	0.0	22.6
03/31/2025 11:13	14.6	1.94	1.82	2.1	0.03	0.03	0.0	24.9
03/31/2025 11:14	14.5	45.21	41.68	48.7	0.14	0.13	0.1	26.1
03/31/2025 11:15	14.4	61.98	56.26	63.2	0.18	0.16	0.1	24.3
03/31/2025 11:16	14.5	26.27	24.22	27.8	0.11	0.10	0.1	24.6
03/31/2025 11:17	14.5	2.00	1.84	2.2	0.03	0.03	0.0	24.7
03/31/2025 11:18	14.5	1.44	1.33	1.5	0.05	0.05	0.0	23.2
03/31/2025 11:19	14.5	0.83	0.77	0.9	0.10	0.09	0.1	22.9
03/31/2025 11:20	14.6	0.72	0.67	0.6	0.12	0.11	0.1	22.8
03/31/2025 11:21	14.6	0.63	0.59	0.6	0.08	0.07	0.0	22.8
03/31/2025 11:22	14.6	0.51	0.48	0.6	0.06	0.06	0.0	22.8
03/31/2025 11:23	14.6	0.43	0.40	0.3	0.08	0.07	0.1	22.8
03/31/2025 11:24	14.6	0.36	0.34	0.3	0.06	0.06	0.0	22.7
03/31/2025 11:25	14.6	0.31	0.29	0.3	0.03	0.03	0.0	22.8
03/31/2025 11:26	14.6	0.26	0.24	0.3	0.05	0.05	0.0	22.8
03/31/2025 11:27	14.6	0.23	0.22	0.3	0.04	0.04	0.0	22.7
03/31/2025 11:28	14.6	0.21	0.20	0.3	0.04	0.04	0.0	22.9
03/31/2025 11:29	14.6	0.19	0.18	0.3	0.04	0.04	0.0	22.8

1-Minute Data Report

Unit 2 - NOx and CO

From: 03/31/2025 11:00 **To:** 03/31/2025 13:44 **Facility Name:** Malburg Generating Station

Generated: 04/09/2025 15:43 **Location:** Vernon, California

Red = Sample Invalid

Date/Time	Unit 2 O2, Dry, Pct 1 Minute(s)	Unit 2 NOx, Ppm 1 Minute(s)	Unit 2 NOx, Ppmvdc 1 Minute(s)	Unit 2 NOx, LbPerHr 1 Minute(s)	Unit 2 CO, Ppm 1 Minute(s)	Unit 2 CO, Ppmvdc 1 Minute(s)	Unit 2 CO, LbPerHr 1 Minute(s)	Unit 2 CTLoad, MWe 1 Minute(s)
03/31/2025 11:30	14.6	0.18	0.17	0.3	0.06	0.06	0.0	22.7
03/31/2025 11:31	14.6	0.17	0.16	0.3	0.08	0.07	0.1	22.8
03/31/2025 11:32	14.6	0.16	0.15	0.3	0.07	0.07	0.0	22.7
03/31/2025 11:33	14.6	0.15	0.14	0.3	0.03	0.03	0.0	22.7
03/31/2025 11:34	14.6	0.14	0.13	0.0	0.04	0.04	0.0	22.7
03/31/2025 11:35	14.6	0.14	0.13	0.0	0.02	0.02	0.0	22.8
03/31/2025 11:36	14.6	0.14	0.13	0.0	0.00	0.00	0.0	22.8
03/31/2025 11:37	14.6	0.14	0.13	0.0	0.06	0.06	0.0	22.9
03/31/2025 11:38	14.6	0.14	0.13	0.0	0.04	0.04	0.0	22.7
03/31/2025 11:39	14.6	0.14	0.13	0.0	0.03	0.03	0.0	22.8
03/31/2025 11:40	14.6	0.14	0.13	0.0	0.06	0.06	0.0	22.8
03/31/2025 11:41	14.6	0.14	0.13	0.0	0.09	0.08	0.1	23.8
03/31/2025 11:42	14.5	2.17	2.00	2.1	0.02	0.02	0.0	24.1
03/31/2025 11:43	14.5	9.81	9.04	10.1	0.10	0.09	0.1	24.0
03/31/2025 11:44	14.5	13.67	12.60	13.5	0.10	0.09	0.1	22.9
03/31/2025 11:45	14.6	18.27	17.11	18.5	0.10	0.09	0.1	22.3
03/31/2025 11:46	14.6	22.00	20.60	22.5	0.03	0.03	0.0	22.3
03/31/2025 11:47	14.6	1.17	1.10	1.2	0.02	0.02	0.0	22.6
03/31/2025 11:48	14.6	0.86	0.81	0.9	-0.01	-0.01	0.0	22.7
03/31/2025 11:49	14.6	0.76	0.71	0.9	-0.01	-0.01	0.0	22.8
03/31/2025 11:50	14.6	0.60	0.56	0.6	-0.02	-0.02	0.0	22.8
03/31/2025 11:51	14.6	0.49	0.46	0.6	0.00	0.00	0.0	22.8
03/31/2025 11:52	14.6	0.41	0.38	0.3	0.08	0.07	0.1	22.8
03/31/2025 11:53	14.6	0.36	0.34	0.3	0.00	0.00	0.0	22.8
03/31/2025 11:54	14.6	0.32	0.30	0.3	-0.04	-0.04	0.0	22.8
03/31/2025 11:55	14.6	0.29	0.27	0.3	0.01	0.01	0.0	22.9
03/31/2025 11:56	14.6	0.26	0.24	0.3	0.05	0.05	0.0	22.9
03/31/2025 11:57	14.6	0.25	0.23	0.3	0.02	0.02	0.0	22.9
03/31/2025 11:58	14.6	0.23	0.22	0.3	0.02	0.02	0.0	22.8
03/31/2025 11:59	14.6	0.21	0.20	0.3	-0.01	-0.01	0.0	22.9

1-Minute Data Report

Unit 2 - NOx and CO

From: 03/31/2025 11:00 **To:** 03/31/2025 13:44 **Facility Name:** Malburg Generating Station

Generated: 04/09/2025 15:43 **Location:** Vernon, California

Red = Sample Invalid

Date/Time	Unit 2 O2, Dry, Pct 1 Minute(s)	Unit 2 NOx, Ppm 1 Minute(s)	Unit 2 NOx, Ppmvdc 1 Minute(s)	Unit 2 NOx, LbPerHr 1 Minute(s)	Unit 2 CO, Ppm 1 Minute(s)	Unit 2 CO, Ppmvdc 1 Minute(s)	Unit 2 CO, LbPerHr 1 Minute(s)	Unit 2 CTLoad, MWe 1 Minute(s)
03/31/2025 12:00	14.6	0.20	0.19	0.3	0.09	0.08	0.1	22.8
03/31/2025 12:01	14.6	0.19	0.18	0.3	0.04	0.04	0.0	22.9
03/31/2025 12:02	14.6	0.18	0.17	0.3	0.01	0.01	0.0	22.9
03/31/2025 12:03	14.6	0.18	0.17	0.3	-0.03	-0.03	0.0	22.8
03/31/2025 12:04	14.6	0.17	0.16	0.3	-0.03	-0.03	0.0	22.8
03/31/2025 12:05	14.6	0.16	0.15	0.3	-0.03	-0.03	0.0	22.8
03/31/2025 12:06	14.6	0.16	0.15	0.3	0.00	0.00	0.0	22.8
03/31/2025 12:07	14.6	0.16	0.15	0.3	0.04	0.04	0.0	22.8
03/31/2025 12:08	14.6	0.16	0.15	0.3	0.02	0.02	0.0	22.8
03/31/2025 12:09	14.6	0.17	0.16	0.3	0.05	0.05	0.0	22.8
03/31/2025 12:10	14.6	0.18	0.17	0.3	-0.04	-0.04	0.0	22.9
03/31/2025 12:11	14.6	0.19	0.18	0.3	0.02	0.02	0.0	22.8
03/31/2025 12:12	14.6	0.20	0.19	0.3	0.01	0.01	0.0	22.8
03/31/2025 12:13	14.6	0.22	0.21	0.3	0.03	0.03	0.0	22.8
03/31/2025 12:14	14.6	0.23	0.22	0.3	0.01	0.01	0.0	22.8
03/31/2025 12:15	14.6	0.25	0.23	0.3	0.03	0.03	0.0	22.9
03/31/2025 12:16	14.6	0.26	0.24	0.3	0.07	0.07	0.0	23.0
03/31/2025 12:17	14.6	0.28	0.26	0.3	0.01	0.01	0.0	22.9
03/31/2025 12:18	14.6	0.30	0.28	0.3	0.03	0.03	0.0	23.1
03/31/2025 12:19	14.6	0.32	0.30	0.3	0.10	0.09	0.1	23.2
03/31/2025 12:20	14.6	0.34	0.32	0.3	0.05	0.05	0.0	23.2
03/31/2025 12:21	14.6	0.35	0.33	0.3	0.09	0.08	0.1	23.2
03/31/2025 12:22	14.6	0.37	0.35	0.3	0.04	0.04	0.0	23.3
03/31/2025 12:23	14.6	0.39	0.37	0.3	0.03	0.03	0.0	23.2
03/31/2025 12:24	14.6	0.40	0.37	0.3	0.02	0.02	0.0	23.2
03/31/2025 12:25	14.6	0.42	0.39	0.3	0.04	0.04	0.0	23.1
03/31/2025 12:26	14.5	0.44	0.41	0.3	0.02	0.02	0.0	23.1
03/31/2025 12:27	14.5	0.46	0.42	0.6	0.02	0.02	0.0	23.0
03/31/2025 12:28	14.6	0.48	0.45	0.6	0.00	0.00	0.0	22.8
03/31/2025 12:29	14.6	0.49	0.46	0.6	0.01	0.01	0.0	22.8

1-Minute Data Report

Unit 2 - NOx and CO

From: 03/31/2025 11:00 **To:** 03/31/2025 13:44 **Facility Name:** Malburg Generating Station

Generated: 04/09/2025 15:43 **Location:** Vernon, California

Red = Sample Invalid

Date/Time	Unit 2 O2, Dry, Pct 1 Minute(s)	Unit 2 NOx, Ppm 1 Minute(s)	Unit 2 NOx, Ppmvdc 1 Minute(s)	Unit 2 NOx, LbPerHr 1 Minute(s)	Unit 2 CO, Ppm 1 Minute(s)	Unit 2 CO, Ppmvdc 1 Minute(s)	Unit 2 CO, LbPerHr 1 Minute(s)	Unit 2 CTLoad, MWe 1 Minute(s)
03/31/2025 12:30	14.6	0.50	0.47	0.6	0.02	0.02	0.0	22.8
03/31/2025 12:31	14.6	0.52	0.49	0.6	0.06	0.06	0.0	22.7
03/31/2025 12:32	14.6	0.53	0.50	0.6	0.10	0.09	0.1	22.7
03/31/2025 12:33	14.6	0.56	0.52	0.6	0.04	0.04	0.0	22.6
03/31/2025 12:34	14.6	0.59	0.55	0.6	0.00	0.00	0.0	22.7
03/31/2025 12:35	14.6	0.63	0.59	0.6	0.02	0.02	0.0	22.8
03/31/2025 12:36	14.6	0.67	0.63	0.6	-0.03	-0.03	0.0	22.8
03/31/2025 12:37	14.6	0.70	0.66	0.6	0.01	0.01	0.0	22.8
03/31/2025 12:38	14.6	0.73	0.68	0.9	0.07	0.07	0.0	22.8
03/31/2025 12:39	14.6	0.76	0.71	0.9	0.02	0.02	0.0	22.8
03/31/2025 12:40	14.6	0.79	0.74	0.9	-0.03	-0.03	0.0	22.8
03/31/2025 12:41	14.6	0.83	0.78	0.9	-0.04	-0.04	0.0	22.8
03/31/2025 12:42	14.6	0.86	0.81	0.9	0.08	0.07	0.1	22.8
03/31/2025 12:43	14.6	0.89	0.83	0.9	0.04	0.04	0.0	22.8
03/31/2025 12:44	14.6	0.92	0.86	0.9	-0.01	-0.01	0.0	22.8
03/31/2025 12:45	14.6	0.96	0.90	0.9	-0.01	-0.01	0.0	22.8
03/31/2025 12:46	14.6	0.99	0.93	0.9	0.02	0.02	0.0	22.8
03/31/2025 12:47	14.6	1.01	0.95	0.9	0.06	0.06	0.0	22.8
03/31/2025 12:48	14.6	1.04	0.97	1.2	0.02	0.02	0.0	22.8
03/31/2025 12:49	14.6	1.07	1.00	1.2	0.06	0.06	0.0	22.8
03/31/2025 12:50	14.6	1.09	1.02	1.2	0.00	0.00	0.0	22.8
03/31/2025 12:51	14.6	1.12	1.05	1.2	-0.01	-0.01	0.0	22.8
03/31/2025 12:52	14.6	1.14	1.07	1.2	0.03	0.03	0.0	22.8
03/31/2025 12:53	14.6	1.17	1.10	1.2	-0.03	-0.03	0.0	22.8
03/31/2025 12:54	14.6	1.20	1.12	1.2	-0.03	-0.03	0.0	22.8
03/31/2025 12:55	14.6	1.23	1.15	1.2	-0.01	-0.01	0.0	22.8
03/31/2025 12:56	14.6	1.27	1.19	1.2	0.00	0.00	0.0	22.8
03/31/2025 12:57	14.6	1.29	1.21	1.2	-0.01	-0.01	0.0	22.7
03/31/2025 12:58	14.6	1.31	1.23	1.5	0.01	0.01	0.0	22.7
03/31/2025 12:59	14.6	1.33	1.25	1.5	-0.01	-0.01	0.0	22.7

1-Minute Data Report

Unit 2 - NOx and CO

From: 03/31/2025 11:00 **To:** 03/31/2025 13:44 **Facility Name:** Malburg Generating Station

Generated: 04/09/2025 15:43 **Location:** Vernon, California

Red = Sample Invalid

Date/Time	Unit 2 O2, Dry, Pct 1 Minute(s)	Unit 2 NOx, Ppm 1 Minute(s)	Unit 2 NOx, Ppmvdc 1 Minute(s)	Unit 2 NOx, LbPerHr 1 Minute(s)	Unit 2 CO, Ppm 1 Minute(s)	Unit 2 CO, Ppmvdc 1 Minute(s)	Unit 2 CO, LbPerHr 1 Minute(s)	Unit 2 CTLoad, MWe 1 Minute(s)
03/31/2025 13:00	14.6	1.35	1.26	1.5	0.04	0.04	0.0	22.7
03/31/2025 13:01	14.6	1.37	1.28	1.5	0.00	0.00	0.0	22.7
03/31/2025 13:02	14.6	1.39	1.30	1.5	0.08	0.07	0.0	22.7
03/31/2025 13:03	14.6	1.42	1.33	1.5	0.06	0.06	0.0	22.7
03/31/2025 13:04	14.6	1.44	1.35	1.5	-0.01	-0.01	0.0	22.8
03/31/2025 13:05	14.6	1.47	1.38	1.5	0.03	0.03	0.0	22.8
03/31/2025 13:06	14.6	1.50	1.40	1.5	-0.02	-0.02	0.0	22.8
03/31/2025 13:07	14.6	1.54	1.44	1.5	0.00	0.00	0.0	22.8
03/31/2025 13:08	14.6	1.60	1.50	1.8	-0.03	-0.03	0.0	22.8
03/31/2025 13:09	14.6	1.67	1.56	1.8	0.00	0.00	0.0	22.9
03/31/2025 13:10	14.6	1.75	1.64	1.8	0.04	0.04	0.0	22.8
03/31/2025 13:11	14.6	1.80	1.69	1.8	0.03	0.03	0.0	22.8
03/31/2025 13:12	14.6	1.80	1.69	1.8	-0.04	-0.04	0.0	22.8
03/31/2025 13:13	14.6	1.69	1.58	1.8	0.05	0.05	0.0	22.8
03/31/2025 13:14	14.6	1.52	1.42	1.5	-0.01	-0.01	0.0	22.9
03/31/2025 13:15	14.6	1.42	1.33	1.5	0.09	0.08	0.1	22.9
03/31/2025 13:16	14.6	1.40	1.31	1.5	0.05	0.05	0.0	22.9
03/31/2025 13:17	14.6	1.43	1.34	1.5	-0.06	-0.06	0.0	22.9
03/31/2025 13:18	14.6	1.50	1.40	1.5	-0.04	-0.04	0.0	22.9
03/31/2025 13:19	14.6	1.58	1.48	1.5	0.00	0.00	0.0	22.9
03/31/2025 13:20	14.6	1.67	1.56	1.8	0.03	0.03	0.0	22.9
03/31/2025 13:21	14.6	1.76	1.65	1.8	0.03	0.03	0.0	22.9
03/31/2025 13:22	14.6	1.77	1.66	1.8	0.04	0.04	0.0	22.8
03/31/2025 13:23	14.6	1.68	1.57	1.8	0.03	0.03	0.0	22.8
03/31/2025 13:24	14.6	1.56	1.46	1.4	-0.01	-0.01	0.0	21.5
03/31/2025 13:25	14.6	1.48	1.39	1.3	-0.02	-0.02	0.0	18.6
03/31/2025 13:26	14.8	3.35	3.24	2.9	-0.04	-0.04	0.0	15.8
03/31/2025 13:27	15.3	10.44	11.00	9.1	-0.12	-0.13	-0.1	13.2
03/31/2025 13:28	15.8	11.67	13.50	9.7	1.49	1.72	0.8	9.8
03/31/2025 13:29	16.3	12.08	15.49	9.8	9.72	12.47	4.8	6.6

1-Minute Data Report

Unit 2 - NOx and CO

From: 03/31/2025 11:00 **To:** 03/31/2025 13:44 **Facility Name:** Malburg Generating Station

Generated: 04/09/2025 15:43 **Location:** Vernon, California

Red = Sample Invalid

Date/Time	Unit 2 O2, Dry, Pct 1 Minute(s)	Unit 2 NOx, Ppm 1 Minute(s)	Unit 2 NOx, Ppmvdc 1 Minute(s)	Unit 2 NOx, LbPerHr 1 Minute(s)	Unit 2 CO, Ppm 1 Minute(s)	Unit 2 CO, Ppmvdc 1 Minute(s)	Unit 2 CO, LbPerHr 1 Minute(s)	Unit 2 CTLoad, MWe 1 Minute(s)
03/31/2025 13:30	16.9	12.35	18.22	10.6	96.39	142.18	50.3	4.0
03/31/2025 13:31	17.3	12.67	20.76	10.7	155.00	254.03	80.1	0.8
03/31/2025 13:32	17.7	11.25	20.74	4.8	190.00	350.31	49.4	0.0
03/31/2025 13:33	19.4	10.83	42.60	1.9	127.22	500.40	13.8	0.0
03/31/2025 13:34	20.9	0.35	0.00	0.0	3.84	0.00	0.0	0.0
03/31/2025 13:35	20.9	0.22	0.00	0.0	2.77	0.00	0.0	0.0
03/31/2025 13:36	20.9	0.16	0.00	0.0	1.80	0.00	0.0	0.0
03/31/2025 13:37	20.9	0.10	0.00	0.0	1.56	0.00	0.0	0.0
03/31/2025 13:38	20.9	0.07	0.00	0.0	1.50	0.00	0.0	0.0
03/31/2025 13:39	20.9	0.05	0.00	0.0	1.33	0.00	0.0	0.0
03/31/2025 13:40	21.0	0.04	0.00	0.0	1.21	0.00	0.0	0.0
03/31/2025 13:41	21.0	0.03	0.00	0.0	1.17	0.00	0.0	0.0
03/31/2025 13:42	21.0	0.03	0.00	0.0	1.02	0.00	0.0	0.0
03/31/2025 13:43	21.0	0.02	0.00	0.0	1.05	0.00	0.0	0.0
03/31/2025 13:44	21.0	0.02	0.00	0.0	0.93	0.00	0.0	0.0
Valid Data Points:	165	165	165	165	165	165	165	165
Average:	15.1	2.45	2.67	2.4	3.65	7.67	1.2	20.6

Attachment E: Compliance Demonstration

NOx CO VOC NH3_Daily Summary Report

Units 1 and 2 - NOx CO VOC NH3

From: 03/31/2025 00:00 **To:** 03/31/2025 23:59 **Facility Name:** Malburg Generating Station

Generated: 04/09/2025 15:39 **Location:** Vernon, California

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

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

Const. Value/Limit Tag:	> 2	> 2	> 2	> 5.49	> 2	> 2	> 2	> 5.49
	Unit 1	Unit 1	Unit 1	Unit 1	Unit 2	Unit 2	Unit 2	Unit 2
	NOx, Normal, Ppmvdc	CO, Normal, Ppmvdc	VOC, Normal, Ppmvdc	NH3Slip, Normal, Ppmvdc	NOx, Normal, Ppmvdc	CO, Normal, Ppmvdc	VOC, Normal, Ppmvdc	NH3Slip, Normal, Ppmvdc
	1 Hour(s)	1 Hour(s)	1 Hour(s)	1 Hour(s)	1 Hour(s)	1 Hour(s)	1 Hour(s)	1 Hour(s)
03/31/2025 00:00	0.0 SI	0.0 SI	0 SI	0.0 SI	1.8	0.1	0	0.4
03/31/2025 01:00	0.0 SI	0.0 SI	0 SI	0.0 SI	1.8	0.1	0	0.4
03/31/2025 02:00	0.0 SI	0.0 SI	0 SI	0.0 SI	1.8	0.1	0	0.4
03/31/2025 03:00	0.0 SI	0.0 SI	0 SI	0.0 SI	1.8	0.1	0	0.4
03/31/2025 04:00	0.0 SI	0.0 SI	0 SI	0.0 SI	1.8	0.1	0	0.3
03/31/2025 05:00	0.0 SI	0.0 SI	0 SI	0.0 SI	1.8	0.1	0	0.4
03/31/2025 06:00	0.0 SI	0.0 SI	0 SI	0.0 SI	1.8	0.2	0	0.3
03/31/2025 07:00	0.0 SI	0.0 SI	0 SI	0.0 SI	1.8	0.1	0	0.3
03/31/2025 08:00	0.0 SI	0.0 SI	0 SI	0.0 SI	1.8	0.1	0	0.3
03/31/2025 09:00	0.0 SI	0.0 SI	0 SI	0.0 SI	1.8	0.1	0	0.3
03/31/2025 10:00	0.0 SI	0.0 SI	0 SI	0.0 SI	1.8	0.1	0	0.3
03/31/2025 11:00	0.0 SI	0.0 SI	0 SI	0.0 SI	3.8 *	0.1	0	1.6 >S
03/31/2025 12:00	0.0 SI	0.0 SI	0 SI	0.0 SI	0.6	0.0	0	0.3
03/31/2025 13:00	0.0 SI	0.0 SI	0 SI	0.0 SI	0.0 SI	0.0 SI	0 SI	0.0 SI
03/31/2025 14:00	0.0 SI	0.0 SI	0 SI	0.0 SI	0.0 SI	0.0 SI	0 SI	0.0 SI
03/31/2025 15:00	1.8	0.5	1	0.6	0.0 SI	0.0 SI	0 SI	0.0 SI
03/31/2025 16:00	1.8	0.5	1	0.6	0.0 SI	0.0 SI	0 SI	0.0 SI
03/31/2025 17:00	1.8	0.7	1	0.5	0.0 SI	0.0 SI	0 SI	0.0 SI
03/31/2025 18:00	1.8	0.7	1	0.6	0.0 SI	0.0 SI	0 SI	0.0 SI
03/31/2025 19:00	1.8	0.6	1	0.6	0.0 SI	0.0 SI	0 SI	0.0 SI
03/31/2025 20:00	1.8	0.5	1	0.6	0.0 SI	0.0 SI	0 SI	0.0 SI
03/31/2025 21:00	1.8	0.4	0	0.6	0.0 SI	0.0 SI	0 SI	0.0 SI
03/31/2025 22:00	1.8	0.4	0	0.6	0.0 SI	0.0 SI	0 SI	0.0 SI
03/31/2025 23:00	1.8	0.4	0	0.6	0.0 SI	0.0 SI	0 SI	0.0 SI
Average/Sum#:	1.8	0.5	1	0.6	1.9	0.1	0	0.4
Minimum:	1.8	0.4	0	0.5	0.6	0.0	0	0.3
Maximum:	1.8	0.7	1	0.6	3.8	0.2	0	1.6
%SI	62.50	62.50	62.50	62.50	45.83	45.83	45.83	45.83