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Filer:	Anwar Ali
Organization:	Valero Cogeneration Corporation
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February 26, 2019

Valero Cogeneration Project
2018 CEC Annual Compliance Report
Docket No. 01-AFC-05

Mr. Anwar Ali
Compliance Project Manager
Valero Cogeneration Project (01-AFC-05)
California Energy Commission
1516 Ninth Street (MS-2000)
Sacramento, California 95814

Dear Mr. Ali:

Enclosed is a copy of the Annual Compliance Report for the calendar year 2016 for the Valero Cogeneration Project, as required by the General Conditions of the CEC's Commission Decision. Along with the compliance status information required by the CEC's General Conditions, documents are included in Section 3 of this report to comply with the following specific conditions:

- AQ-56 – Cooling Tower TDS Content
- HAZ-1 – List of Hazardous Materials Contained at Cogeneration Unit
- WASTE-2 – Waste Management Methods
- WQ-2 – Annual Monitoring Report to RWQCB
- WR-1 – Annual Water Use Summary

Please contact Ms. Mikayla Briggs at (707) 745-7609 should you have questions regarding this information.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kimberly A. Ronan'.

Kimberly A. Ronan
Manager - Environmental Engineering

KAR/MNB



VALERO COGENERATION PROJECT

**2018 ANNUAL COMPLIANCE REPORT FOR
THE CALIFORNIA ENERGY COMMISSION**

VALERO COGENERATION PROJECT
2018 ANNUAL COMPLIANCE REPORT

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VALERO COGENERATION PROJECT
2018 ANNUAL COMPLIANCE REPORT

Section 1: Updated Compliance Matrix (Open Conditions)

2018 Annual Compliance Report

Valero Cogeneration Project Conditions of Certification

Item No.	Condition No.	Requirement	Timing	No. of Days Prior Within 30 days after	Status
2	<u>AQ-2</u>	SO ₂ emissions offsets quarterly report	End of each quarter	Within 30 days after	Ongoing
13	<u>AQ-13</u>	Fire only refinery fuel or natural gas in gas turbines and HRSG duct burners	On-going	--	Ongoing
14	<u>AQ-14</u>	Combined heat input rate to the power train limited to 810 MM Btu per hour, averaged over any 3-hr period	On-going	--	Ongoing
15	<u>AQ-15</u>	Combined heat input rate to the power train limited to 19,440 MM Btu per calendar day	On-going	--	Ongoing
16	<u>AQ-16</u>	Combined cumulative heat input rate for each power train limited to 6,351,000 MM Btu per year	On-going	--	Ongoing
17	<u>AQ-17</u>	Properly operate and maintain SCR and CO Oxidation Catalyst abatement systems	On-going	--	Ongoing
18	<u>AQ-18</u>	Gas turbines and HRSGs shall comply with criteria pollutant emission limits when firing natural gas exclusively	On-going	--	Ongoing
19	<u>AQ-19</u>	Gas turbines and HRSGs shall comply with criteria pollutant emission limits under all operating scenarios	On-going	--	Ongoing
20	<u>AQ-20</u>	Sulfuric acid emissions limited to less than 7 tons in any consecutive 4 quarters	On-going	--	Ongoing
22	<u>AQ-22</u>	Total power train criteria pollutant emissions annual limits and annual report	On-going	--	Ongoing
23	<u>AQ-23</u>	Calculate and record criteria pollutant emissions on a daily basis	On-going	--	Ongoing
24	<u>AQ-24</u>	Notify District's Source Test Section prior to conducting any tests	Prior to source test	7	Ongoing
25	<u>AQ-25</u>	Submit monitoring reports in accordance with District procedures and time limits	On-going	--	Ongoing
26	<u>AQ-26</u>	Maintain records on site at least 5 years	On-going	--	Ongoing

2018 Annual Compliance Report

Valero Cogeneration Project Conditions of Certification

Item No.	Condition No.	Requirement	Timing	No. of Days Prior	Status
27	<u>AQ-27</u>	Notify District of any violations of permit conditions per Title V	On-going	--	Ongoing
31	<u>AQ-31</u>	Start up period for gas turbines no longer than 256 min or achieve 1 hr in compliance	Start Up mode	--	Ongoing
34	<u>AQ-34</u>	Comply with Acid Rain program CEM requirements	On-going	--	Ongoing
36	<u>AQ-36</u>	Report H2S/TRS content of refinery fuel gas	End of each quarter	Within 60 days after	Ongoing
38	<u>AQ-38</u>	Install/maintain CEM and recorder for NOX, CO and O2	On-going	--	Ongoing
39	<u>AQ-39</u>	POC and PM10 quarterly source testing	Quarterly	--	Ongoing
40	<u>AQ-40</u>	SAM, SO2, SO3, ammonium sulfates quarterly source testing	Quarterly	--	Ongoing
42	<u>AQ-42</u>	Inspect HC valves per Reg 8-18	Quarterly	--	Ongoing
43	<u>AQ-43</u>	Equip connectors with graphitic-based gaskets and inspect per Reg 8-18	Quarterly	--	Ongoing
44	<u>AQ-44</u>	Equip HC centrifugal compressors with dual mechanical seals and inspect per Reg 8-18	Quarterly	--	Ongoing
54	<u>AQ-56</u>	Measured TDS content of cooling tower circulating water	Monthly, Annual; Annual Compl. Report	--	Ongoing
80	<u>HAZ-1</u>	List of Haz Materials in reportable quantities	Annual Compl. Report	--	Ongoing
85	<u>NOISE-2</u>	Noise Complaint Records	On-going	--	Ongoing
116	<u>WASTE-1</u>	Notify CPM of any enforcement action by any local, state or federal agency	As needed	--	Ongoing
123	<u>WATER QUALITY-2</u>	Notify CPM of any changes to NPDES permit, submit annual monitoring report	Receipt of NPDES permit, annual reporting; Annual Compl. Report	30 (after)	Ongoing
131	<u>WATER RES-1</u>	Water use metering, annual report	Annual Compl. Report	--	Ongoing

VALERO COGENERATION PROJECT
2018 ANNUAL COMPLIANCE REPORT

Section 2: Summary of Current Cogeneration Unit Operating Status

VALERO COGENERATION PROJECT

2018 ANNUAL COMPLIANCE REPORT

Section 2: Cogeneration Unit Operating Status

The Cogen Unit 2018 GT-4901 reliability was 99.56%. Total unplanned downtime was 38.2 hours. GT-4901 availability for 2018 was 94.18% including all unplanned and planned maintenance down times (total of 7,751 hours).

Planned maintenance hours:

- Routine PMs were performed (water wash, filters, instrument calibrations)
- Turbine enclosure fan motor replaced

Unplanned Outages for the year included:

- Two outages due to turbine fan flowmeter failures
- Two outages due to LP speed probe failures
- One outage due to T3 temperature probe

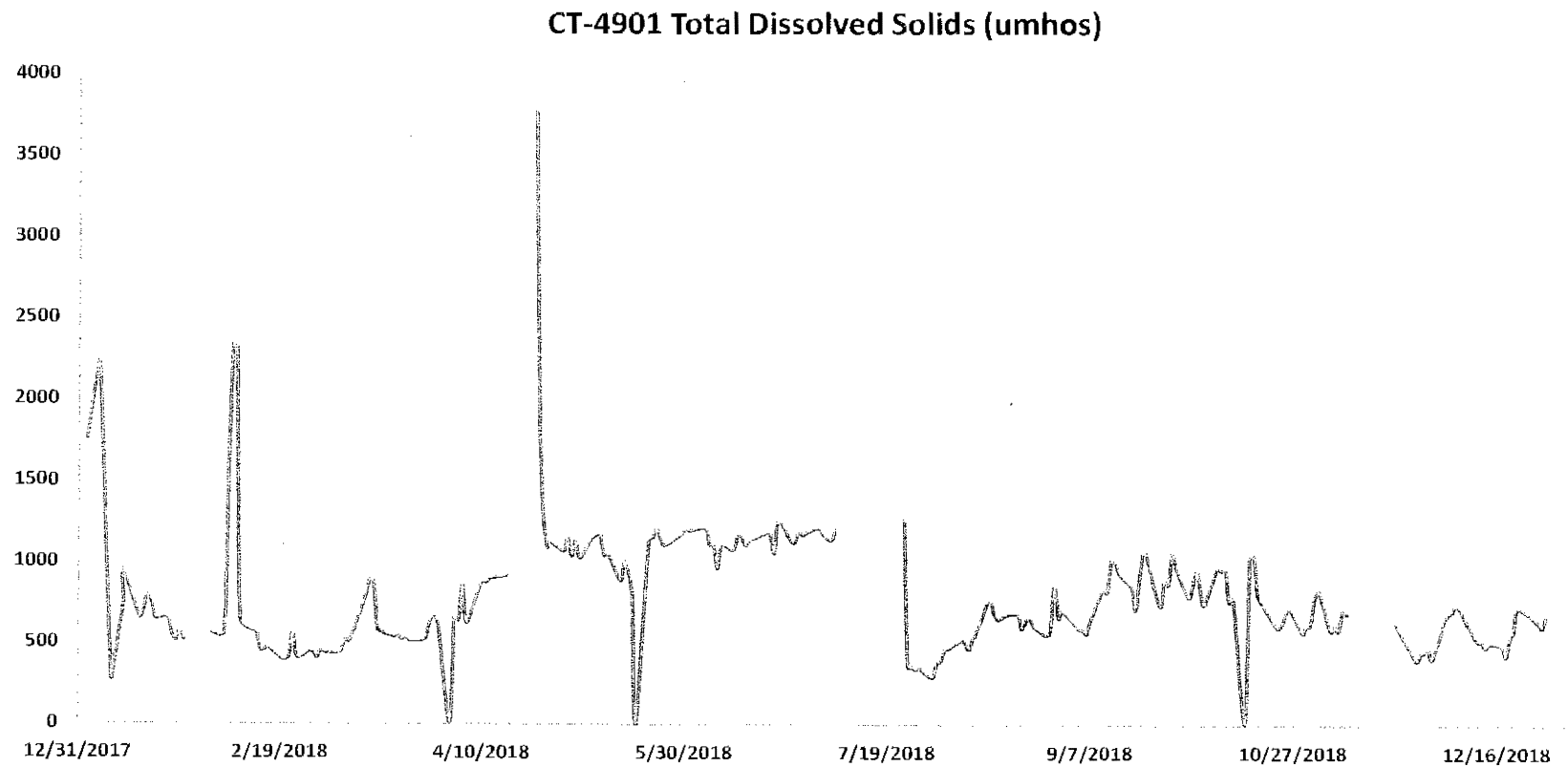
Major work:

- No major work performed this year

VALERO COGENERATION PROJECT
2018 ANNUAL COMPLIANCE REPORT

Section 3: Documents Required by Specific Conditions

VALERO COGENERATION PROJECT
2018 ANNUAL COMPLIANCE REPORT
AQ-56 Cooling Tower TDS Content



VALERO COGENERATION PROJECT
2018 ANNUAL COMPLIANCE REPORT

HAZ-1 Hazardous Materials Contained at Cogeneration Unit

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. Valero		Chemical Location C5 COGEN				CERS ID 10133161				
Facility Name Valero Benicia Refinery						Facility ID 48-000-020015				
3400 E 2nd Street, Benicia 94510						Status Submitted on 2/1/2019 12:21 PM				
DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	EL-1515 VISCOSITY GRADE 10 TO 680	Pounds	1950	487	1950		- Physical	POLYALKYLENE GLYCOL MIXTURE	95 %	9038-95-3
	CAS No	State	Storage Container		Pressure	Waste Code	Flammable	PROPRIETARY ADDITIVES	5 %	
		Liquid	Steel Drum		Ambient		- Health Acute			
		Type			Temperature		Toxicity			
		Mixture	Days on Site: 365		Ambient		- Health Skin			
							Corrosion			
							Irritation			
	EMERACATM ADCAT CO CATALYST	Pounds	4800	4800	4800		- Health	ALUMINUM OXIDE		1344-28-1
	CAS No	State	Storage Container		Pressure	Waste Code	Carcinogenicity	PLATINUM		7440-06-4
	1344-28-1	Solid	Other		Ambient		- Health Acute			
		Type			Temperature		Toxicity			
		Mixture	Days on Site: 365		> Ambient		- Health Skin			
							Corrosion			
							Irritation			
							- Health			
							Respiratory Skin			
							Sensitization			
							- Health Serious			
							Eye Damage Eye			
							Irritation			
							- Health Specific			
							Target Organ			
							Toxicity			
Combustible Liquid, Class II	FIREWASH F1	Pounds	3200	400	1600		- Health	NON IONIC SURFACTANT	25 %	
	CAS No	State	Storage Container		Pressure	Waste Code	Carcinogenicity	PETROLEUM DISTILLATES	50 %	64742-47-8
		Liquid	Steel Drum		Ambient		- Health Acute	HEAVY AROMATIC NAPHTHA	25 %	64742-94-5
		Type			Temperature		Toxicity	2-BUTOXYETHOXY ETHANOL	25 %	112-34-5
		Mixture	Days on Site: 365		Ambient		- Health Skin			
							Corrosion			
							Irritation			
							- Health Specific			
							Target Organ			
							Toxicity			
	ION EXCHANGE RESIN USF C-211	Pounds	710	710	710		- Health Acute	WATER	60 %	7732-18-5
	CAS No	State	Storage Container		Pressure	Waste Code	Toxicity	SULFONATED COPOLYMER OF	70 %	69011-22-9
		Solid	Other		Ambient		- Health Skin	STYRENE		
		Type			Temperature		Corrosion			
		Mixture	Days on Site: 365		Ambient		Irritation			
							- Health Serious			
							Eye Damage Eye			
							Irritation			
							- Health Specific			
							Target Organ			
							Toxicity			

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. **Valero**
 Facility Name **Valero Benicia Refinery**
 3400 E 2nd Street, Benicia 94510

Chemical Location
C5 COGEN

CERS ID **10133161**
 Facility ID **48-000-020015**
 Status **Submitted on 2/1/2019 12:21 PM**

DOT Code/Fire Haz. Class	Common Name	Unit	Quantities			Annual Waste Amount	Federal Hazard Categories	Hazardous Components (For mixture only)		
			Max. Daily	Largest Cont.	Avg. Daily			Component Name	% Wt	EHS CAS No.
	MOBIL DTE 25	Pounds	800	400	400		- Health Acute Toxicity	NON HAZARDOUS PROPRIETARY MIXTURE		
	CAS No	State	Storage Container		Pressure	Waste Code				
		Liquid	Steel Drum		Ambient					
		Type			Temperature					
		Mixture	Days on Site: 365		Ambient					
	MOBIL JET OIL II	Pounds	2490	1250	2490		- Health Acute Toxicity	TRICRESYL PHOSPHATE	5 %	1330-78-5
	CAS No	State	Storage Container		Pressure	Waste Code	- Health Reproductive Toxicity	1-NAPHTHYLAMINE, N-PHENYL	5 %	90-30-2
		Liquid	Aboveground Tank, Steel Drum,		Ambient		- Health Skin Corrosion Irritation			
		Type	Other		Temperature		- Health Respiratory Skin Sensitization			
		Mixture	Days on Site: 365		Ambient		- Health Serious Eye Damage Eye Irritation			
							- Health Specific Target Organ Toxicity			
DOT: 8 - Corrosives (Liquids and Solids)	Nalco 3DTrasar 3DT230	Pounds	966	506	506		- Physical Gas Under Pressure	Sulfuric Acid	5 %	✓ 7664-93-9
	CAS No	State	Storage Container		Pressure	Waste Code	- Physical Explosive	Phosphoric Acid	5 %	7664-38-2
	7664-93-9	Liquid	Tote Bin		Ambient		- Physical Corrosive To Metal	Benzotriazole	5 %	95-14-7
		Type			Temperature		- Health Acute Toxicity			
		Mixture	Days on Site: 365		Ambient		- Health Skin Corrosion Irritation			
							- Health Respiratory Skin Sensitization			
							- Health Serious Eye Damage Eye Irritation			

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org. Valero		Chemical Location				CERS ID 10133161				
Facility Name Valero Benicia Refinery		C5 COGEN				Facility ID 48-000-020015				
3400 E 2nd Street, Benicia 94510						Status Submitted on 2/1/2019 12:21 PM				
						Hazardous Components (For mixture only)				
DOT Code/Fire Haz. Class	Common Name	Unit	Quantities		Annual Waste	Federal Hazard	Component Name	% Wt	EHS CAS No.	
			Max. Daily	Largest Cont.	Avg. Daily	Amount	Categories			
DOT: 8 - Corrosives (Liquids and Solids)	NALCO H-550	Pounds	2400	2400	1800		- Physical	GLUTARALDEHYDE	60 %	111-30-8
	CAS No	State	Storage Container		Pressure	Waste Code	Corrosive To			
	111-30-8	Liquid	Tote Bin		Ambient		Metal			
Combustible Liquid, Class III-A		Type			Temperature		- Health Acute			
		Mixture	Days on Site: 365		> Ambient		Toxicity			
							- Health Skin			
							Corrosion			
							Irritation			
							- Health			
							Respiratory Skin			
							Sensitization			
							- Health Serious			
							Eye Damage Eye			
							Irritation			
							- Health Specific			
							Target Organ			
							Toxicity			
							- Health			
							Aspiration Hazard			
							- Health Germ			
							Cell Mutagenicity			
	NALCO STABREX 5T70	Pounds	850	850	425		- Health Acute	SODIUM HYDROXIDE	5 %	1310-73-2
	CAS No	State	Storage Container		Pressure	Waste Code	Toxicity			
		Liquid	Tote Bin		Ambient		- Health Skin			
		Type			Temperature		Corrosion			
		Mixture	Days on Site: 365		Ambient		Irritation			
							- Health			
							Respiratory Skin			
							Sensitization			
							- Health Serious			
							Eye Damage Eye			
							Irritation			
DOT: 8 - Corrosives (Liquids and Solids)	NALCO Trasar Trac 104	Pounds	570	50	570		- Health Acute	Sodium Molybdate	7 %	7631-95-0
	CAS No 7631-95-0 ✓ EHS	State	Storage Container		Pressure	Waste Code	Toxicity			
		Liquid	Plastic/Non-metallic Drum							
		Type			Temperature					
		Mixture	Days on Site: 365							

Hazardous Materials And Wastes Inventory Matrix Report

CERS Business/Org.	Valero	Chemical Location				CERS ID	10133161	
Facility Name	Valero Benicia Refinery	C5 COGEN				Facility ID	48-000-020015	
	3400 E 2nd Street, Benicia 94510					Status	Submitted on 2/1/2019 12:21 PM	
DOT Code/Fire Haz. Class	Common Name	Unit	Quantities		Annual Waste	Federal Hazard	Hazardous Components	
			Max. Daily	Largest Cont.	Avg. Daily	Amount	Categories	(For mixture only)
	NATURAL GAS	Pounds	297	3240	297		- Physical	Component Name
	CAS No	State	Storage Container		Pressure	Waste Code	Flammable	METHANE
		Gas	Steel Drum, Other		> Ambient		- Physical Gas	% Wt
		Type			Temperature		Under Pressure	EHS
		Mixture	Days on Site: 365		> Ambient		- Physical	CAS No.
							Explosive	
							- Health Acute	
							Toxicity	
							- Health Simple	
							Asphyxiant	
	PLATE TYPE CATALYST	Pounds	\$2000	\$2000	52000		- Physical	MOLYBDENUM TRIOXIDE
	CAS No	State	Storage Container		Pressure	Waste Code	Corrosive To	10 %
		Solid	Other		> Ambient		Metal	80 %
		Type			Temperature		- Health Acute	1313-27-5
		Mixture	Days on Site: 365		> Ambient		Toxicity	13463-67-7
							- Health	1314-62-1
							Respiratory Skin	
							Sensitization	
							- Health Specific	
							Target Organ	
							Toxicity	
	REFINERY FUEL GAS	Pounds	407	3240	407		- Health Acute	FUEL GAS
	CAS No	State	Storage Container		Pressure	Waste Code	Toxicity	68308-27-0
		Gas	Steel Drum, Other		> Ambient		- Health Skin	
		Type			Temperature		Corrosion	
		Mixture	Days on Site: 365		> Ambient		Irritation	
							- Health Serious	
							Eye Damage Eye	
							Irritation	
							- Health Simple	
							Asphyxiant	
DOT: 9 - Misc. Hazardous Materials	SOUR WASTEWATER	Pounds	20	220	20		- Physical	HYDROGEN SULFIDE
	CAS No	State	Storage Container		Pressure	Waste Code	Flammable	1 %
		Liquid	Steel Drum, Other		> Ambient		- Health Acute	7783-06-4
		Type			Temperature		Toxicity	
		Mixture	Days on Site: 365		> Ambient		- Health	7732-18-5
							Respiratory Skin	
							Sensitization	

Hazardous Materials And Wastes Inventory Matrix Report

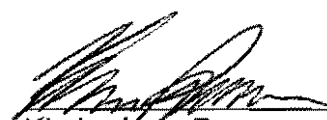
CERS Business/Org.	Valero	Chemical Location				CERS ID	10133161			
Facility Name	Valero Benicia Refinery	C5 COGEN				Facility ID	48-000-020015			
	3400 E 2nd Street, Benicia 94510					Status	Submitted on 2/1/2019 12:21 PM			

VALERO COGENERATION PROJECT

2018 ANNUAL COMPLIANCE REPORT

WASTE-2 Documentation of Waste Management Methods

I certify that all wastes generated at the Valero Cogeneration Facility are properly characterized and managed according to waste management practices described in CTEMS EPL-4001 Container Labeling and Closure Policy and the Benicia Refinery Waste Management Compliance Manual.



Kimberly A. Ronan 2/26/19 Date
Manager - Environmental Engineering

VALERO COGENERATION PROJECT

2018 ANNUAL COMPLIANCE REPORT

WQ-2: Annual Monitoring Data Submitted to RWQCB

The Valero Cogeneration Project sends a small amount of wastewater to the refinery's wastewater treatment system, which after treatment becomes a part of the refinery's effluent. Valero submits its self-monitoring data for the refinery's effluent monthly to the Regional Water Quality Control Board (RWQCB) electronically via the Internet to eSMR, the State Board electronic reporting system.

Attached is the 2018 NPDES Compliance Summary Table for the Valero Benicia Refinery, which provides a listing of the refinery's NPDES permit monitoring points and compliance parameters, along with a monthly accounting of the compliance status and number of samples taken each month.

For each month, the entry made in each row (e.g., 0/31) corresponds to the number samples exceeding the limit versus the number of samples taken during the month. An entry of 0/31 means that no samples exceeded the limit out of 31 (i.e., daily) samples that month.

During the 2018 reporting year, there were 2 sample results that exceeded a NPDES permit limit. Both exceedances were related to the daily concentration limit for Mercury.

On January 20, 2018, an equipment bypass was made at the Wastewater treatment Plant due to a Selenium EQIP tank mixer failure. Inspections and repairs were expedited during the weekend to minimize the equipment bypass duration and the EQIP tank was refilled and unit normalized on January 22, 2018. Pursuant to the Bypass Requirements specified in Provision VIII, Attachment E, daily samples were collected at Discharge Point E-001. The data from these samples were included in the monthly SMR report to the RWQCB. Because of the equipment bypass, the daily concentration limit for Hg and daily trigger level were exceeded on January 20 and 21, 2018 at 0.12 ug/L and 0.62 ug/L, respectively. As required by Regional Board Order No R2-2017-0041 Section VI.C.2.c of the SF Bay Mercury and PCBs Watershed Permit, the refinery began accelerated sampling. Accelerated analytical results were submitted to the Water Board. All additional mercury concentration results were below the monthly and daily trigger levels and the monthly and daily limits.

The 11 EFF-001 Mercury exceedances from January through November, are not violations because this limit only applies annually.

VALERO COGENERATION PROJECT
2018 ANNUAL COMPLIANCE REPORT
2018 COMPLIANCE SUMMARY TABLE
Valero Benicia Refinery NPDES CA0005550

2018 COMPLIANCE SUMMARY TABLE

VALERO BENICIA REFINERY

NPDES #CA0005550

PARAMETER	LIMIT	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	Total
Monitoring Point EFF-001														0/0
Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) Ef	Max 3400	0/4	0/1	0/1	0/13	0/5	0/1	0/1	0/1	0/1	0/1	0/1	0/8	0/38
Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) Ef	Max 1900	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/12
Chemical Oxygen Demand (COD) Eff Daily Maximum lb/day	Max 24000	0/4	0/1	0/1	0/13	0/5	0/1	0/1	0/1	0/1	0/1	0/1	0/8	0/38
Chemical Oxygen Demand (COD) Eff Monthly Average lb/day	Max 13000	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/12
Total Suspended Solids (TSS) Eff Daily Loading lb/day	Max 2400	0/5	0/4	0/1	0/14	0/8	0/4	0/2	0/3	0/4	0/3	0/2	0/9	0/59
Total Suspended Solids (TSS) Eff Monthly Average lb/day	Max 1500	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/12
Oil and Grease Eff Daily Maximum lb/day	Max 1000	0/7	0/4	0/4	0/16	0/8	0/4	0/5	0/4	0/4	0/5	0/3	0/12	0/76
Oil and Grease Eff Monthly Average lb/day	Max 550	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/12
pH Eff Daily Minimum SU	Min 6	0/31	0/28	0/31	0/30	0/31	0/30	0/31	0/31	0/30	0/31	0/30	0/31	0/365
pH Eff Daily Maximum SU	Max 9	0/31	0/28	0/31	0/30	0/31	0/30	0/31	0/31	0/30	0/31	0/30	0/31	0/365
Sulfide, Total (as S) Eff Daily Maximum lb/day	Max 21	0/4	0/1	0/1	0/23	0/5	0/1	0/1	0/1	0/1	0/1	0/1	0/7	0/47
Sulfide, Total (as S) Eff Monthly Average lb/day	Max 10	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/12
Ammonia, Total (as N) Eff Daily Maximum mg/L	Max 20	0/4	0/1	0/1	0/23	0/5	0/1	0/1	0/1	0/1	0/1	0/1	0/7	0/47
Ammonia, Total (as N) Eff Daily Loading lb/day	Max 2000	0/4	0/1	0/1	0/23	0/5	0/1	0/1	0/1	0/1	0/1	0/1	0/7	0/47
Ammonia, Total (as N) Eff Monthly Average mg/L	Max 5.7	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/12
Ammonia, Total (as N) Eff Monthly Average lb/day	Max 1000	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/12
Acute Toxicity Eff 11Samp 90th% % survival	Min 70	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Acute Toxicity Eff 11Samp MovingMed % survival	Min 90	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Chronic Toxicity Eff Daily Maximum TUc	Max 10	0/0	0/1	0/0	0/0	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/1	0/4
Acute Toxicity Eff 11Samp 90th% % survival	Min 70	0/6	0/4	0/4	0/6	0/4	0/4	0/5	0/4	0/4	0/5	0/4	0/5	0/55
Acute Toxicity Eff 11Samp MovingMed % survival	Min 90	0/6	0/4	0/4	0/6	0/4	0/4	0/5	0/4	0/4	0/5	0/4	0/5	0/55
Chromium (Total) Eff Daily Loading lb/day	Max 46	0/4	0/1	0/1	0/13	0/5	0/1	0/1	0/1	0/1	0/1	0/1	0/8	0/38
Chromium (Total) Eff Monthly Average lb/day	Max 18	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/12
Chromium (VI) Eff Daily Maximum ug/L	Max 72	0/1	0/1	0/1	0/21	0/5	0/1	0/1	0/1	0/1	0/1	0/1	0/7	0/42
Chromium (VI) Eff Daily Loading lb/day	Max 2.9	0/1	0/1	0/1	0/21	0/5	0/1	0/1	0/1	0/1	0/1	0/1	0/7	0/42
Chromium (VI) Eff Monthly Average ug/L	Max 36	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/12
Chromium (VI) Eff Monthly Average lb/day	Max 1.3	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/12
Copper, Total Eff Daily Maximum ug/L	Max 120	0/4	0/1	0/1	0/13	0/5	0/1	0/1	0/1	0/1	0/1	0/1	0/8	0/38

Copper, Total Eff Monthly Average ug/L
 Mercury, Total Eff Daily Maximum ug/L
 Mercury, Total Eff Monthly Average ug/L
 Mercury, Total Eff Annual Loading kg/year
 Selenium, Total Eff Daily Maximum ug/L
 Selenium, Total Eff Monthly Average ug/L
 Selenium, Total Eff 12Month Running Annual Average lbs
 Cyanide, Total (as CN) Eff Daily Maximum ug/L
 Cyanide, Total (as CN) Eff Monthly Average ug/L
 Bis (2-Ethylhexyl) Phthalate Eff Daily Maximum ug/L
 Bis (2-Ethylhexyl) Phthalate Eff Monthly Average ug/L
 Phenols, Total Eff Daily Loading lb/day
 Phenols, Total Eff Monthly Loading lb/day
 TCDD Equivalents Eff Daily Maximum pg/L
 TCDD Equivalents Eff Monthly Average pg/L
 Polychlorinated Biphenyls (PCBs), Sum Eff Daily Maximum
 Polychlorinated Biphenyls (PCBs), Sum Eff Monthly Average
 Monitoring Point EFF-002-A1
 Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) Eff
 Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) Eff
 Chemical Oxygen Demand (COD) Eff Daily Maximum mg/L
 Chemical Oxygen Demand (COD) Eff Monthly Average mg/L
 Total Suspended Solids (TSS) Eff Daily Maximum mg/L
 Total Suspended Solids (TSS) Eff Monthly Average mg/L
 Total Organic Carbon (TOC) Eff Daily Maximum mg/L
 Oil and Grease Eff Daily Maximum mg/L
 Oil and Grease Eff Monthly Average mg/L
 pH Eff Daily Minimum SU
 pH Eff Daily Maximum SU
 Chromium (Total) Eff Daily Maximum mg/L
 Chromium (Total) Eff Monthly Average mg/L
 Chromium (VI) Eff Daily Maximum mg/L
 Chromium (VI) Eff Monthly Average mg/L
 Phenols, Total Eff Daily Maximum mg/L

Max 58	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/12
Max 0.12	2/10	0/1	0/1	0/1	0/1	0/1	0/2	0/1	0/2	0/1	0/1	0/1	2/29
Max 0.079	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/12
Max 0.08	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	1/1	11/12
Max 50	0/7	0/4	0/4	0/14	0/8	0/4	0/5	0/4	0/4	0/5	0/3	0/12	0/74
Max 42	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/12
Max 21	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/12
Max 42	0/4	0/1	0/1	0/23	0/5	0/1	0/1	0/1	0/1	0/1	0/1	0/7	0/47
Max 19	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/12
Max 110	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/2
Max 53	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/2
Max 25	0/4	0/1	0/1	0/13	0/2	0/1	0/1	0/1	0/1	0/1	0/1	0/6	0/33
Max 12	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/1	0/12
Max 0.28	0/3	0/1	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/5
Max 0.14	0/1	0/1	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/3
Max 0.0015	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/2
Max 0.00095	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/2
													0/0
Max 48	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 26	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 360	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 180	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 33	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 21	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 110	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1
Max 15	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1
Max 8	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1
Min 6.5	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1
Max 8.5	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1
Max 0.6	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.21	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.062	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.028	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.35	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0

Phenols, Total Eff Monthly Average mg/L

Monitoring Point EFF-003-A1

Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) Ef

Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) Ef

Chemical Oxygen Demand (COD) Eff Daily Maximum mg/L

Chemical Oxygen Demand (COD) Eff Monthly Average mg/L

Total Suspended Solids (TSS) Eff Daily Maximum mg/L

Total Suspended Solids (TSS) Eff Monthly Average mg/L

Total Organic Carbon (TOC) Eff Daily Maximum mg/L

Oil and Grease Eff Daily Maximum mg/L

Oil and Grease Eff Monthly Average mg/L

pH Eff Daily Minimum SU

pH Eff Daily Maximum SU

Chromium (Total) Eff Daily Maximum mg/L

Chromium (Total) Eff Monthly Average mg/L

Chromium (VI) Eff Daily Maximum mg/L

Chromium (VI) Eff Monthly Average mg/L

Phenols, Total Eff Daily Maximum mg/L

Phenols, Total Eff Monthly Average mg/L

Monitoring Point EFF-004-A1

Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) Ef

Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) Ef

Chemical Oxygen Demand (COD) Eff Daily Maximum mg/L

Chemical Oxygen Demand (COD) Eff Monthly Average mg/L

Total Suspended Solids (TSS) Eff Daily Maximum mg/L

Total Suspended Solids (TSS) Eff Monthly Average mg/L

Total Organic Carbon (TOC) Eff Daily Maximum mg/L

Oil and Grease Eff Daily Maximum mg/L

Oil and Grease Eff Monthly Average mg/L

pH Eff Daily Minimum SU

pH Eff Daily Maximum SU

Chromium (Total) Eff Daily Maximum mg/L

Chromium (Total) Eff Monthly Average mg/L

Chromium (VI) Eff Daily Maximum mg/L

Max 0.17	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
														0/0
Max 48	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 26	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 360	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 180	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 33	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 21	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 110	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Max 15	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Max 8	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Min 6.5	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Max 8.5	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Max 0.6	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.21	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.062	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.028	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.35	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.17	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
														0/0
Max 48	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 26	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 360	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 180	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 33	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 21	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 110	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Max 15	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Max 8	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Min 6.5	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Max 8.5	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Max 0.6	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.21	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.062	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0

Chromium (VI) Eff Monthly Average mg/L

Phenols, Total Eff Daily Maximum mg/L

Phenols, Total Eff Monthly Average mg/L

Monitoring Point EFF-005-A1

Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) Ef

Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) Ef

Chemical Oxygen Demand (COD) Eff Daily Maximum mg/L

Chemical Oxygen Demand (COD) Eff Monthly Average mg/L

Total Suspended Solids (TSS) Eff Daily Maximum mg/L

Total Suspended Solids (TSS) Eff Monthly Average mg/L

Total Organic Carbon (TOC) Eff Daily Maximum mg/L

Oil and Grease Eff Daily Maximum mg/L

Oil and Grease Eff Monthly Average mg/L

pH Eff Daily Minimum SU

pH Eff Daily Maximum SU

Chromium (Total) Eff Daily Maximum mg/L

Chromium (Total) Eff Monthly Average mg/L

Chromium (VI) Eff Daily Maximum mg/L

Chromium (VI) Eff Monthly Average mg/L

Phenols, Total Eff Daily Maximum mg/L

Phenols, Total Eff Monthly Average mg/L

Monitoring Point EFF-006-A1

Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) Ef

Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) Ef

Chemical Oxygen Demand (COD) Eff Daily Maximum mg/L

Chemical Oxygen Demand (COD) Eff Monthly Average mg/L

Total Suspended Solids (TSS) Eff Daily Maximum mg/L

Total Suspended Solids (TSS) Eff Monthly Average mg/L

Total Organic Carbon (TOC) Eff Daily Maximum mg/L

Oil and Grease Eff Daily Maximum mg/L

Oil and Grease Eff Monthly Average mg/L

pH Eff Daily Minimum SU

pH Eff Daily Maximum SU

Chromium (Total) Eff Daily Maximum mg/L

Max 0.028	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.35	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.17	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
														0/0
Max 48	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 26	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 360	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 180	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 33	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 21	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 110	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Max 15	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Max 8	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Min 6.5	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Max 8.5	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Max 0.6	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.21	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.062	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.028	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.35	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.17	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
														0/0
Max 48	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 26	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 360	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 180	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 33	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1
Max 21	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1
Max 110	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Max 15	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Max 8	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Min 6.5	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Max 8.5	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Max 0.6	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0

Chromium (Total) Eff Monthly Average mg/L
 Chromium (VI) Eff Daily Maximum mg/L
 Chromium (VI) Eff Monthly Average mg/L
 Phenols, Total Eff Daily Maximum mg/L
 Phenols, Total Eff Monthly Average mg/L

Monitoring Point EFF-007-A1

Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) Ef
 Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) Ef
 Chemical Oxygen Demand (COD) Eff Daily Maximum mg/L
 Chemical Oxygen Demand (COD) Eff Monthly Average mg/L
 Total Suspended Solids (TSS) Eff Daily Maximum mg/L
 Total Suspended Solids (TSS) Eff Monthly Average mg/L
 Total Organic Carbon (TOC) Eff Daily Maximum mg/L
 Oil and Grease Eff Daily Maximum mg/L
 Oil and Grease Eff Monthly Average mg/L
 pH Eff Daily Minimum SU
 pH Eff Daily Maximum SU
 Chromium (Total) Eff Daily Maximum mg/L
 Chromium (Total) Eff Monthly Average mg/L
 Chromium (VI) Eff Daily Maximum mg/L
 Chromium (VI) Eff Monthly Average mg/L
 Phenols, Total Eff Daily Maximum mg/L
 Phenols, Total Eff Monthly Average mg/L

Monitoring Point EFF-008-A1

Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) Ef
 Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) Ef
 Chemical Oxygen Demand (COD) Eff Daily Maximum mg/L
 Chemical Oxygen Demand (COD) Eff Monthly Average mg/L
 Total Suspended Solids (TSS) Eff Daily Maximum mg/L
 Total Suspended Solids (TSS) Eff Monthly Average mg/L
 Total Organic Carbon (TOC) Eff Daily Maximum mg/L
 Oil and Grease Eff Daily Maximum mg/L
 Oil and Grease Eff Monthly Average mg/L
 pH Eff Daily Minimum SU

Max 0.21	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.062	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.028	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.35	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.17	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
														0/0
Max 48	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 26	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 360	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 180	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 33	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 21	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 110	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Max 15	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Max 8	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Min 6.5	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Max 8.5	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Max 0.6	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.21	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.062	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.028	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.35	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.17	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
														0/0
Max 48	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 26	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 360	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 180	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 33	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 21	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 110	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0
Max 15	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Max 8	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Min 6.5	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3

pH Eff Daily Maximum SU

Chromium (Total) Eff Daily Maximum mg/L

Chromium (Total) Eff Monthly Average mg/L

Chromium (VI) Eff Daily Maximum mg/L

Chromium (VI) Eff Monthly Average mg/L

Phenols, Total Eff Daily Maximum mg/L

Phenols, Total Eff Monthly Average mg/L

Monitoring Point EFF-009-A1

Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) Ef

Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) Ef

Chemical Oxygen Demand (COD) Eff Daily Maximum mg/L

Chemical Oxygen Demand (COD) Eff Monthly Average mg/L

Total Suspended Solids (TSS) Eff Daily Maximum mg/L

Total Suspended Solids (TSS) Eff Monthly Average mg/L

Total Organic Carbon (TOC) Eff Daily Maximum mg/L

Oil and Grease Eff Daily Maximum mg/L

Oil and Grease Eff Monthly Average mg/L

pH Eff Daily Minimum SU

pH Eff Daily Maximum SU

Chromium (Total) Eff Daily Maximum mg/L

Chromium (Total) Eff Monthly Average mg/L

Chromium (VI) Eff Daily Maximum mg/L

Chromium (VI) Eff Monthly Average mg/L

Phenols, Total Eff Daily Maximum mg/L

Phenols, Total Eff Monthly Average mg/L

Monitoring Point EFF-010-A1

Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) Ef

Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) Ef

Chemical Oxygen Demand (COD) Eff Daily Maximum mg/L

Chemical Oxygen Demand (COD) Eff Monthly Average mg/L

Total Suspended Solids (TSS) Eff Daily Maximum mg/L

Total Suspended Solids (TSS) Eff Monthly Average mg/L

Total Organic Carbon (TOC) Eff Daily Maximum mg/L

Oil and Grease Eff Daily Maximum mg/L

Max 8.5	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Max 0.6	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.21	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.062	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.028	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.35	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.17	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
													0/0
Max 48	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 26	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 360	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 180	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 33	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1
Max 21	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1
Max 110	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Max 15	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Max 8	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Min 6.5	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Max 8.5	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Max 0.6	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.21	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.062	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.028	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.35	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.17	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
													0/0
Max 48	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 26	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 360	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 180	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 33	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1
Max 21	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/1
Max 110	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Max 15	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3

Oil and Grease Eff Monthly Average mg/L

pH Eff Daily Minimum SU

pH Eff Daily Maximum SU

Chromium (Total) Eff Daily Maximum mg/L

Chromium (Total) Eff Monthly Average mg/L

Chromium (VI) Eff Daily Maximum mg/L

Chromium (VI) Eff Monthly Average mg/L

Phenols, Total Eff Daily Maximum mg/L

Phenols, Total Eff Monthly Average mg/L

Monitoring Point EFF-011-A1

Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) Ef

Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) Ef

Chemical Oxygen Demand (COD) Eff Daily Maximum mg/L

Chemical Oxygen Demand (COD) Eff Monthly Average mg/L

Total Suspended Solids (TSS) Eff Daily Maximum mg/L

Total Suspended Solids (TSS) Eff Monthly Average mg/L

Total Organic Carbon (TOC) Eff Daily Maximum mg/L

Oil and Grease Eff Daily Maximum mg/L

Oil and Grease Eff Monthly Average mg/L

pH Eff Daily Minimum SU

pH Eff Daily Maximum SU

Chromium (Total) Eff Daily Maximum mg/L

Chromium (Total) Eff Monthly Average mg/L

Chromium (VI) Eff Daily Maximum mg/L

Chromium (VI) Eff Monthly Average mg/L

Phenols, Total Eff Daily Maximum mg/L

Phenols, Total Eff Monthly Average mg/L

Monitoring Point EFF-012-A1

Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) Ef

Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) Ef

Chemical Oxygen Demand (COD) Eff Daily Maximum mg/L

Chemical Oxygen Demand (COD) Eff Monthly Average mg/L

Total Suspended Solids (TSS) Eff Daily Maximum mg/L

Total Suspended Solids (TSS) Eff Monthly Average mg/L

Max 8	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Min 6.5	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Max 8.5	0/1	0/0	0/0	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Max 0.6	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.21	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.062	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.028	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.35	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.17	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
													0/0
Max 48	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 26	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 360	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 180	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 33	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 21	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 110	0/0	0/0	0/1	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Max 15	0/0	0/0	0/1	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Max 8	0/0	0/0	0/1	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Min 6.5	0/0	0/0	0/1	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Max 8.5	0/0	0/0	0/1	0/1	0/0	0/0	0/0	0/0	0/0	0/0	0/1	0/0	0/3
Max 0.6	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.21	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.062	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.028	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.35	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 0.17	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
													0/0
Max 48	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 26	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 360	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 180	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 33	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Max 21	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0

VALERO COGENERATION PROJECT

2018 ANNUAL COMPLIANCE REPORT

WR-1 Annual Cogeneration Unit Water Use Summary

**Valero Cogeneration Project
2018**

MONTHLY						
Water Usage					Recycled Water	Off-Set
GPD				Acre-Feet	Acre-Feet	Acre-Feet
Average	GPM	(min)	(max)	Total	Total	Net

Jan-18	87,032	47	7	85,105	6.4	15.3	8.9
Feb-18	92,227	64	10	111,829	7.9	10.9	3.0
Mar-18	81,688	57	72,303	94,590	7.8	10.7	3.0
Apr-18	70,954	49	6	93,177	6.5	17.0	10.4
May-18	85,961	60	27,989	98,807	8.2	12.0	3.8
Jun-18	88,922	62	63,322	103,258	8.2	14.9	6.7
Jul-18	91,479	64	329	109,438	8.7	13.9	5.2
Aug-18	102,179	71	97,903	107,534	9.7	16.0	6.2
Sep-18	98,955	69	71,728	104,650	9.1	16.8	7.7
Oct-18	78,370	54	66,502	106,355	7.5	15.9	8.4
Nov-18	56,783	39	6,358	96,002	5.2	10.3	5.1
Dec-18	90,217	63	59,740	91,252	8.6	8.7	0.1

ANNUAL						
Water Usage					Recycled Water	Off-Set
GPD				Acre-Feet	Acre-Feet	Acre-Feet
Average	GPM	(min)	(max)	Total	Total	Net

2018	83,731	58	6	111,829	94	162	68
2017	56,271	39	2	113,280	63	199	135

GPD: Gallons per day

CEC Condition of Certification, Water Use Metering, WATER RES-1 & WATER RES-2

VALERO COGENERATION PROJECT
2018 ANNUAL COMPLIANCE REPORT

Section 4: Post-Certification Changes

No changes were made in 2018.

VALERO COGENERATION PROJECT
2018 ANNUAL COMPLIANCE REPORT

Section 5: Resolution to Unmet Submittals

There were no unmet submittals or resolutions to unmet submittals in 2018.

VALERO COGENERATION PROJECT

2018 ANNUAL COMPLIANCE REPORT

Section 6: Permits and Filings Involving Other Governmental Agencies

Bay Area Air Quality Management District (BAAQMD)

- Valero Cogeneration Project – 2018 Annual Mass Emissions Report to BAAQMD
- Routine Reports to BAAQMD:
 - Monthly Cogen NOx Report
 - Monthly Cogen CO Report
 - Monthly Cogen Fuel Gas Report (H2S/TRS)
 - Quarterly Cogen SO2 Curtailment Report
 - Quarterly Fuel Gas Sulfur Report
- Source Testing Reports:
 - Quarterly source test reports for SAM measurements
 - Annual source test reports for PM10, POC, SO2 measurements
- Form CEC-1304 - Quarterly Report for Power Plants 10 MW or Greater
- Title V, Renewed - Issued by BAAQMD April 30, 2013

Regional Water Quality Control Board (RWQCB)

- Valero Refinery NPDES Permit Renewal (including Cogeneration operations) RWQCB Order No. R2-2015-0037, CA 0005550: Approved by RWQCB on August 12, 2015, effective October 1, 2015 through September 30, 2020.
- Valero Refinery SWPPP Update (including Cogeneration operations)

Department of Energy (DOE) Energy Information Administration (EIA) reports

- EIA – 860 “Annual Electric Generator Report”
- EIA – 923 “Monthly Power Plant Operations Report”

Solano County CUPA / City of Benicia Fire Dept

- Valero Benicia Refinery 2018 Hazardous Materials Business Plan (including Cogeneration operations)

U. S. EPA

- Valero Benicia Refinery NSPS/MACT Semiannual Reports

VALERO COGENERATION PROJECT
2018 ANNUAL COMPLIANCE REPORT

Section 7: Projection of 2019 Compliance Activities

Operations:

Maintain cogeneration unit operations in compliance with emission limits and other permit conditions.

Recordkeeping:

Continue collection of data and records and maintain compliance files.

Reporting:

Prepare and submit monthly CEM reports.

Prepare and submit required quarterly, semiannual, and annual reports.

Source Testing:

Conduct quarterly source testing for SAM. Conduct annual source testing for PM10, POC, and SO2.

Continuous Emissions Monitoring Systems (CEMS):

Continue to conduct quarterly accuracy audits (CGA & RATA).

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Section 8: 2018 Files

The following onsite compliance files have been established for the Valero Cogeneration unit and contain the information described for the previous year's operating period.

File Number	File Name	File Description
CGN AI-03-02	CEC Annual Compliance Report	Annual Compliance Reports for Cogen required by general conditions of CEC's Commission Decision
CGN AI-03-02	Routine Cogen Quarterly Reports	Cogen Quarterly SO2 Containment Report
CGN AI-03-03	Annual Mass Emissions Report	Cogen Report as required by Permit Conditions #22 and #23
CGN EA-17-00	CGN CEC Compliance Fees	Invoices, Cogen Facility Compliance Fees
CGN WA-03-02	Monthly Cogen Water Use Reports	Cogen Cooling Tower TDS by Conductivity Cogen H2O Report
Fed 60a AI-24-16	FED-60A QA/QC GT-4901/SG-4901	Cogen – CEMS Quality Assurance Plan
SRCTST AI-03-03	BAAQMD Notifications	Notifications of source tests for Cogen
SRCTST AI-03-03	Cogen – Monthly CEMS Report	Cogen - Monthly Gas Turbine and HRSG Monitoring Report Reg. 1-522.8
SRCTST AI-24-00	Monthly CEMS Down & OOC LOGS	2018 Monthly CEMS Downtime & Out of Control Logs
SRCTST AI-21-03	Cogen – Stack Source Tests	Source test for the Cogen Stack and Quarterly Source Test Submittals
SRCTST AI-21-03	SRCTST GT-4901 S-1030	Source Test Reports

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Section 9: Evaluation of the Onsite Contingency Plan

Onsite Contingency Plan for Unexpected Temporary & Permanent Closure

The Onsite Contingency Plan for Unexpected Temporary and Permanent Closure is reviewed and updated annually.

Cogeneration Unit Operating Procedures

The normal and emergency procedures in the operating procedures manual are reviewed and updated annually.

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Section 10: Complaints, NOVs, Warnings and Citations

2018 Complaints:

The refinery received no complaints that have been determined to be related to the Cogeneration Unit.

2017 Notices of Violation (NOVs):

The BAAQMD issued the following NOVs for events that were related to the Cogeneration Unit (GT/SG-4901 stack emissions):

BAAQMD NOV #	Date Issued	Date of Event	Description
57341	5/14/18	3/25/18	Failure to report inoperative TRS monitor on time. The analyzer became inoperative on Friday March 23, 2018 but was not discovered until the following Monday. The analyzer was repaired on March 24, 2018 and passed calibration.

2018 Warnings and Citations:

The refinery received no other warnings or citations that have been determined to be related to the Cogeneration Unit.