



July 26, 2019

Mr. Joseph Douglas  
Compliance Project Manager  
California Energy Commission MS-2000  
1516 Ninth Street  
Sacramento, CA 95814

**RE: High Desert Power Project  
Docket No. 97-AFC-1  
2018-2019 Annual Compliance Report**

Dear Mr. Douglas:

In accordance with the Energy Commission's Decision (No. 97-AFC-1, Section IV), enclosed is the 2018 Annual Compliance Report for the High Desert Power Project (HDPP) located in Victorville, California. This report covers all applicable compliance activities specified in the Decision for the period of July 1, 2018 through June 30, 2019.

As required, the report includes the items specified in the Annual Compliance Report requirements. Specifically, this report includes a listing of hazardous materials in quantities above reportable quantities (HAZ-1), a list of ammonia deliveries (HAZ-2), a summary of planned versus actual waste management activities (WASTE-1), a status report regarding visual treatment maintenance (VIS-1), and a status of reclaimed water use metering maintenance (S&W-21).

In addition, the Compliance matrix has been updated. Please note that those conditions which have been satisfied have been closed and are not included in this Annual Compliance Report. Should you have any questions or need additional information regarding this submittal, please contact Ali Balcazar at (760) 530-5501.

Sincerely,

**HIGH DESERT POWER TRUST,**

a Delaware statutory business trust

By: High Desert Power Project, LLC  
a California limited liability company, as agent  
for the High Desert Power Trust under that certain  
Amended and Restated Project Supervisory Agreement  
dated as of April 30, 2001

By:   
Claude Couvillion – Vice President

cc: Project File: 13.17.5



**HIGH DESERT POWER PROJECT**

**2018 - 2019 Annual Compliance Report**

**Report Period: July 1, 2018 through June 30, 2019**

**High Desert Power Project, LLC  
19000 Perimeter Road  
Victorville, California 92394**

**For Submittal to:**

**California Energy Commission  
Energy Facilities Siting and  
Environmental Protection Division  
1516 Ninth Street  
Sacramento, California 95814-5512**

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**ATTACHMENTS**

Attachment A	CEC Compliance Matrix
Attachment B	Hazardous Chemicals Used at HDPP above Reportable Quantities (HAZ-1)
Attachment C	Ammonia Delivery Log (HAZ-2)
Attachment D	Planned Versus Actual Waste Management Activities (WASTE-1)
Attachment E	Visual Treatment Update
Attachment F	Reclaimed Water Status Summary

## **1.0 COMPLIANCE MATRIX**

An updated copy of the CEC Compliance Matrix is included with this report in Attachment A. The CEC Compliance Matrix shows multiple due dates for the same condition linked to the unique construction start dates for the plant site, water pipelines and natural gas pipeline. The conditions are denoted by “W-South”, “W-North” or “G” to indicate the condition which applies to the southern water pipeline, northern water pipeline and natural gas pipeline; respectively. The matrix shows the compliance status of all applicable conditions for the reporting period July 2018 through June 2019. Conditions which have been satisfied and marked as closed in previous monthly and annual compliance reports are not included in this report.

## **2.0 CURRENT OPERATING STATUS**

Commercial operation of the power plant commenced on April 22, 2003. The plant is operating in compliance with all permit requirements. No significant changes to facility operating status have occurred during this operating period.

## **3.0 REQUIRED DOCUMENTS SUBMITTED WITH THIS REPORT**

- As required by CEC Condition HAZ-1, a listing of hazardous materials used and stored on-site at or above reportable quantities is included in Attachment B.
- As required by CEC Condition HAZ-2, a listing of all aqueous ammonia deliveries is included in this report, including the amount delivered, time of delivery, and time of sunrise and time of sunset. Copies of the ammonia deliveries are included in Attachment C.
- As required by CEC Condition WASTE-1, Attachment D includes a summary of Planned versus Actual Waste Management Activities.
- CEC Condition VIS-1 requires HDPP to submit an update of the status report of the visual treatment maintenance plan. An updated summary is provided in Attachment E.
- CEC Condition S&W-21 requires a summary of reclaimed water use, as well as servicing, testing, and calibration of reclaimed water metering devices. An updated summary is provided in Attachment F.

#### 4.0 APPROVED POST-CERTIFICATION CHANGES

Table 4-1 contains a cumulative list of all approved changes to the Conditions of Certification (COC) for High Desert Power Project (“HDPP”).

**Table 4-1. HDPP Approved Changes to Conditions of Certification**

Condition	Approved Condition Summary Description	Approval Date
AQ-3 (o)	Substitute low sulfur fuel requirement for soot filter requirement	17-May-01
AQ-16, AQ-17.	Changed periodicity of compliance testing and eliminated the CO/VOC ratio calculation	4-Aug-2008
AQ-29	Eliminate time duration limits of startup episodes, and replace individual emission limits with emission limits for the power block.	25-Oct-04
AQ-28, AQ-29, AQ-31	Revise oxides of sulfur emission limits by adding limits based on the higher heating value of natural gas fuel.	25-Oct-04
AQ-14, AQ-16, AQ-19, AQ-25, AQ-26	Revise conditions to maintain consistency with Federal and MDAQMD.	25-Oct-04
AQ-32	Cooling Tower design change	5-Sep-01
AQ-33	Require surrender of Emission Reduction Credits prior to commercial operation rather than prior to start of construction.	17-May-01
BIO-10	New condition to address additional 7.3 acres to compensate for construction parking and laydown area.	21-Dec-01
SOIL&WATER-4	Extends requirement to inject 13,000 acre-feet to the end of the 18 <sup>th</sup> commercial operating year. Requires the installation and operation of a UV system, and benchmarks for meeting 13,000 acre-feet requirement.	21-Jul-06
HAZ-5	Modification to the condition to include a reference to the appropriate API 650 standards Section VIII, Div. 1 of the ASME Boiler and Pressure Vessel Code.	5-Sep-01
TSE-1, TSE-3 TSLN-1, TSLN-2, TSLN-3, TSLN-4	Change of Ownership for the HDPP Transmission Line and clarification of transmission line design parameters and code requirements.	16-May-01
VIS-1	Change in selection of color treatment of major project structures to blend with the surrounding desert environment in a non-reflective moderately light brown color (Pantone 467) rather than the background sky.	17-May-01

**Table 4-1. HDPP Approved Changes to Conditions of Certification**

<b>Condition</b>	<b>Approved Condition Summary Description</b>	<b>Approval Date</b>
N/A	Approval of request to construct Surge Tank	24-Jan-03
N/A	Approval for Emergency Diesel Generator	1-Jul-03
N/A	Approval of well relocations	18-Oct-02
N/A	Approval of the use of Well A as a monitoring well	16-Dec-02
SOIL&WATER-1,SOIL&WATER-4,SOIL&WATER-20,SOIL&WATER-21	Allows for the use of reclaimed water at the site. Eliminates requirement to inject 13,000 acre-feet to the end of the 18 <sup>th</sup> commercial operating year. Requires studies for transferring to 100% reclaimed water.	18-Nov-09
SOIL&WATER-1	Extends deadline of final feasibility study to November 1, 2013.	1-Nov-11
SOIL&WATER-1	Extends deadline of final feasibility study to November 1, 2014.	26-Apr-13
SOIL&WATER-1,SOIL&WATER-7	Allows for the conditional temporary use of MRB Adjudicated Water Rights until November 1, 2016, after providing proof of agreements. Requires new Petition to drought proof the power plant by November 1, 2015. Also requires monthly reporting of water use.	28-Aug-14
SOIL&WATER-1,SOIL&WATER-22	Provides loading sequence for water use, naming reclaimed water primary water supply when available and to maximum use given current equipment capabilities and permit conditions. States conditions for the use of SWP Water, banked water, and MRR Water Rights. Allows for temporary percolation of SWP Water by the MWA to increase HDPP water bank until September 30, 2018. Monthly Reporting due by the 15 <sup>th</sup> of every month.	14-Jun-16
Soil and Water Conditions 1-22	Reissues Soil and Water Conditions. Allows for permanent percolation of SWP Water. Sets limits for the maximum annual and three year average of reclaimed water, minimum limit for reclaimed water use set at 20% on a three year average. Mojave Water Agency tasked with calculation of water bank balance. Deletes Soil and Water 3, 6(C), 6(D), 6(E), 8, 9, 10, 15, 16, and 22.	3-May-2018

## 5.0 DELINQUENT SUBMITTALS

There are currently no delinquent submittals.

## 6.0 FILINGS OR PERMITS ISSUED BY OTHER GOVERNMENTAL AGENCIES

No new filings or permits were issued by other agencies during this reporting term. Note that HDPP has elected not to pursue a permit to continue water injection activities with the Lahontan Regional Water Control Board at this time. Instead, pursuant to Soil and Water 1 & 22, HDPP has opted to replenish the groundwater bank through percolation through the MWA.

HDPP was issued a permit to use reclaimed water on November 1, 2019, with the Victor Valley Water Reclamation Authority (VWVRA), as the Lahontan Regional Water Quality Control Board has delegated authority of Title 22 Reclaimed Water Use permitting to VWVRA. HDPP subsequently filed a request to rescind Lahontan Regional Water Quality Control Board Order No. RSV-2009-0138, which authorized reclaimed water use by HDPP in 2009.

## 7.0 COMPLIANCE ACTIVITIES SCHEDULED FOR THE NEXT YEAR

A summary of the new compliance activities planned for the next year is included in Table 7-1. On-going compliance activities are summarized in Table 7-2.

**Table 7-1. Milestone Compliance Activities Planned for July 2019 through June 2020**

Due Date	Condition	Description
26-Jan-20	AQ-15a	Thirty (30) days prior to the compliance/certification tests the operator shall provide a written test plan for MDAQMD review and approval.
16-Feb-20	AQ-15b	10 days prior to the tests, written notice of the tests shall be provided to MDAQMD so observer may be present.
15-Apr-20	AQ-15c	45 days after testing provide the CEC CPM a copy of the source test results.
26-Feb-20	AQ-16	Perform annual compliance test 6 weeks prior to the expiration date of the MDAQMD permits.
30-July-19, 30-Oct-19, 30-Jan-20, 30-Apr-20	AQ-20	Submit to the APCO and the USEPA Region IX quarterly reports for the preceding calendar quarter by January 30, April 30, July 30, and October 30 of each year. Each January 30 submittal shall include a summary of the reported information for the previous year.
31-Jan-20	BIO-6	The BRMIMP requires that an annual report be prepared detailing all planned maintenance activities along the gas pipeline for the upcoming year.
30-July-19, 30-Oct-19 30-Jan-20 30-Apr-20	SOIL & WATER-5 and 18	Calculation of Balance: Submit quarterly reports for groundwater pumped, all SWP Water treated and injected, and all SWP water banked through percolation by MWA in the preceding quarter.
30-Oct-19	SOIL & WATER-5	Submit annual estimate of the anticipated amount of SWP water that will be banked and amount that will be pumped in the coming year.
NA	SOIL & WATER-13b	Submit Annual Report of monitoring results of water injection as specified by the Water Treatment and Monitoring Plan. At this time, HDPP has elected not to pursue a renewed conditional waiver or permit with the Lahontan Regional Water Quality Control Board to allow for direct water injection activities. Therefore, water injection activities have ceased at this time. HDPP will seek a new permit with the Regional Board prior to any SWP Water injection.
Monthly	SOIL & WATER-1&22	Submit Monthly Water Use Report

**Table 7-2. On-going Compliance Activities**

<b>Condition</b>	<b>Description</b>
AQ-2, AQ-5, AQ-7, AQ-9, AQ-11, AQ-12, AQ-13, AQ-14, AQ-25, AQ-26, AQ-27, AQ-28, AQ-29, AQ-30, AQ-31, AQ-32	Operate combustion turbine train and cooling tower under these requirements.
BIO-3	Notify CPM of non-compliance. CPM to decide whether corrective action is sufficient.
BIO-4, CUL-7, PAL-7	Continue to train new employees and maintain documentation on cultural, paleontological, and biological awareness.
BIO-6	The Designated Biologist must be present for any major maintenance activity performed on the revegetated gas or water pipeline.
HAZ-1	Maintain records of hazardous material usage on site.
HAZ-2	Maintain a listing of all aqueous ammonia deliveries.
NOISE-2	Within thirty (30) days of receiving a noise complaint, file a noise complaint resolution form documenting claim and mitigation
SOIL & WATER –5 & 18	Quarterly report of well construction progress and accounting of groundwater pumped, and water injected / banked.
SOIL & WATER 10a	Monitoring of groundwater levels shall be performed quarterly, starting 6 months after start of rough grading.
TRANS-3	Ensure that all federal and state regulations for the transport of hazardous materials are observed.
WASTE-1	Record keeping associated with waste generation and disposal.
WASTE-3	Notify CPM of any hazardous material related enforcement action taken or pending against the site or any waste hauler, or treatment, storage, or disposal facility with which it contracts.

**8.0 LISTING OF THE YEAR’S ADDITIONS TO THE COMPLIANCE FILE**

For this reporting period, copies of submittals indicated in Table 8-1 were added to the compliance file.

**Table 8-1. Compliance File Additions**

<b>Condition</b>	<b>Description</b>	<b>Submittal Date</b>	<b>Status</b>
AQ-5	Maintain records of natural gas sulfur content. Restrict fuel use for the operation of the combustion turbines and supplemental duct firing to natural gas with a sulfur content of 0.2 grains/100dscf or less.	See AQ-20	Ongoing. Data reported in Quarterly Compliance Reports. Records maintained onsite.
AQ-7	Maintain records of natural gas used for 5 years.	N/A	Ongoing. Records maintained onsite.
AQ-13	Record ammonia use in pounds per hour.	N/A	Ongoing. Records maintained onsite.



**Table 8-1. Compliance File Additions**

<b>Condition</b>	<b>Description</b>	<b>Submittal Date</b>	<b>Status</b>
AQ-15a	Thirty (30) days prior to the compliance/certification tests the operator shall provide a written test plan for MDAQMD review and approval.	7-Jan-19	Submitted.
AQ-15b	10 days prior to the tests, written notice of the tests shall be provided to MDAQMD so observer may be present.	7-Jan-19	Submitted.
AQ-15c	45 days after testing provide the CEC CPM a copy of the source test results.	26-Mar-19	Submitted.
AQ-16	Perform annual compliance/certification test 6 weeks prior to the expiration date of the MDAQMD permits.	15-Feb-19	Completed.
AQ-18	Characterize at least once every 5 years, beginning with the initial compliance test, VOC emissions from cold startup, warm startup, hot startup, and shutdown conditions.	Cold Start Testing results submitted 05-Jan-17. Hot, Warm, and Shutdown submitted on 24-Aug-17.	Submitted.
AQ-20	Submit to the APCO and the USEPA Region IX quarterly reports for the preceding calendar quarter by January 30, April 30, July 30, and October 30 of each year. Each January 30 submittal shall include a summary of the reported information for the previous year.	2ndQtr18: 13-Jul-18. 3rd Qtr18: 16-Oct-18. 4thQtr 18: 22-Jan-19. 1st Qtr19: 26-Apr-19.	Submitted.
AQ-26	Maintain records of PM10 emission calculations for 5 years.		Ongoing activity. Records maintained onsite.
BIO-6a	The BRMIMP and ITP Section L requires that an annual report documenting planned maintenance activities on the gas pipelines be prepared.	10-Jan-19	Submitted.
SOIL & WATER 1	Submit report of all water use from all water sources by the project.	7/13/2018, 8/21/18, 9/11/18, 10/04/18, 11/13/18, 12/11/18, 1/08/2019, 2/11/19, 3/12/19, 4/04/19, 5/08/19, 6/07/19	Submitted.
SOIL & WATER-5a & 18	Calculation of Balance: Submit quarterly reports for water banked and withdrawn.	2 <sup>nd</sup> Qtr18: 16-Jul-18. 3rd Qtr18: 10-Oct-18. 4thQtr 18: 09-Jan-19. 1st Qtr19: 16-Apr-19.	Submitted.

## **9.0 EVALUATION OF ONSITE CONTINGENCY PLAN**

HDPP has reviewed its Onsite Contingency Plan for “Unexpected Temporary and Permanent Facility Closure,” dated February 2003. No changes to the document are recommended at this time.

**ATTACHMENT A**

**CEC COMPLIANCE MATRIX**

2018 - 2019 Compliance Matrix

Final Decision Page #	CEC Condition Number	Condition Verification Action/Submittal Summary	Due Date	Actual Submittal Date	Approval Date	Status
105	AQ-2	Submit quarterly reports for information identified in AQ-20.	One month after the end of each quarter.	See AQ-20	-	On-going.
105	AQ-4	For all utility trenching activities, implement the following fugitive dust control measures: a) top layer of soil shall be pre-wetted prior to excavation; b) travel surfaces shall be wetted with the use of a water truck; and c) all exposed soil areas shall be wetted by the use of hose spraying.	8-Apr-02	-	-	Implemented.
107	AQ-5	Maintain records of natural gas sulfur content. Restrict fuel use for the operation of the combustion turbines and supplemental duct firing to natural gas with a sulfur content of 0.2 grains/100dscf or less.	22-Dec-02	See AQ-20	-	In Progress, Quarterly Report Input
108	AQ-7	Maintain records of natural gas used for 5 years	22-Dec-02	-	-	On-going.
108	AQ-8	Provide copies of federal PSD, and Acid Rain permits 30 days after receipt.	30 days after receipt.	PSD: 12-May-01. Acid Rain: 21-Sep-06 Revised PSD: 15-Mar-10	N/A	Completed. PSD Permit submitted in 2001. Acid Rain Permit submitted with Title V Permit September 21, 2006. Both permits last renewed November 4, 2019.
108	AQ-9	Opacity shall not exceed 20% for three minutes of any hour. Applies to all three turbines.	27-Jan-03			On-going
108	AQ-11	Plant shall not be run without CO/SCR in operation. Document emissions for quarterly and annual reports.	27-Jan-03	-	-	On-going.
108	AQ-12	Ammonia shall be injected through SCR, slip shall not exceed 10ppm.	7-Apr-03	-	-	On-going
109	AQ-13	Record ammonia use in pounds per hour.	27-Jan-03	-	-	On-going.
109	AQ-14	Emissions of NOx, CO, O2 and ammonia slip shall be monitored using a Continuous Emissions Monitoring System (CEMS). System shall be installed, calibrated, maintained, and operated according to an MDAQMD-approved monitoring plan.	15-Jun-02	31-Jul-02	Plan approved by MDAQMD, Approved by CEC 24-Sep-02.	On-going.
109	AQ-15a	Thirty (30) days prior to the compliance/certification tests the operator shall provide a written test plan for Mojave Desert Air Quality Management District (MDAQMD) review and approval.	30 Days Prior to test	7-Jan-19	-	Submitted.
109	AQ-15b	10 days prior to the tests, written notice of the tests shall be provided to MDAQMD so observer may be present.	10 Days prior to test	7-Jan-19	-	Submitted.
109	AQ-15c	45 days after testing provide the CEC CPM a copy of the source test results.	45 Days After test	26-Mar-19		Submitted.
109	AQ-16	Perform annual compliance test 6 weeks prior to the expiration date of the MDAQMD permits.	15-May-14	15-Feb-19	-	Complete.
110	AQ-17	Submit test results of monitoring certification. See verification for Condition AQ-15. 45 days after testing provide the CEC CPM a copy of the source test results.	45 Days After test	26-Mar-19	-	See AQ-15b.
110	AQ-18	Characterize at least once every 5 years, beginning with the initial compliance test, VOC emissions from cold startup, warm startup, hot startup, and shutdown conditions.	22-May-18	Cold Start Testing results submitted 05-Jan-17. Hot, Warm, and Shutdown submitted on 24-Aug-17	-	Submitted
111	AQ-20	Submit to the APCO and the USEPA Region IX quarterly reports for the preceding calendar quarter by January 30, April 30, July 30, and October 30 of each year. Each January 30 submittal shall include a summary of the reported information for the previous year.	Quarterly	2ndQtr18: 13-Jul-18. 3rd Qtr18: 16-Oct-18. 4thQtr 18: 22-Jan-19 1st Qtr19: 26-Apr-19	-	Submitted.

2018 - 2019 Compliance Matrix

Final Decision Page #	CEC Condition Number	Condition Verification Action/Submittal Summary	Due Date	Actual Submittal Date	Approval Date	Status
112	AQ-25	Perform cooling tower water quality test in accordance with an MDAQMD-approved test and emissions protocol plan.	10-Jan-03	30-Aug-02, revised and approved 29-Jul-14.	-	Protocol approved by MDAQMD. Ongoing activity.
112	AQ-26	Maintain records of PM10 emission calculations for 5 years.	10-Feb-03	-	-	Ongoing.
113	AQ-27	Maintenance procedures established to verify drift eliminators are functioning properly and shall be made available to MDAQMD personnel on request.	10-Feb-03	-	-	Ongoing. Procedure available for inspection.
113	AQ-28	Emissions from Combustion Turbine (including its associated duct burner) shall not exceed emission limits. NOx, CO, and Ammonia verified by CEMS and annual compliance tests. VOC, SOx, and PM10 verified by annual compliance tests or other compliance methods in the case of SOx.	7-Apr-03	-	-	Submitted. Ongoing quarterly requirement.
114	AQ-29	Maintain emissions records listed during start-up and shutdown periods.	7-Apr-03	-	-	Ongoing.
114	AQ-30	Maintain NOx, CO, VOC emissions requirements listed (lb/day).	7-Apr-03	-	-	Ongoing.
115	AQ-31	Maintain NOx, CO, VOC emissions requirements listed (TPY).	7-Apr-03	-	-	Ongoing.
115	AQ-32	The drift rate shall not exceed 0.0006 percent. The maximum hourly PM10 emission rate shall not exceed 1.2 pounds per hour.	10-Feb-03	-	-	Ongoing.
141	BIO-1	Submit qualifications of selected Designated Biologist to CEC for approval.	As Needed	23-Jun-05	8-Aug-05	Ongoing.
142	BIO-3	Notify CPM of non-compliance. CPM to decide whether corrective action is sufficient.	As Needed	-	N/A	On-going activity. No non-compliances incidents occurred during this reporting period.
143	BIO-4	At least 30 days prior to any site disturbance, submit Worker Environmental Awareness Program and the name and qualifications of the person(s) administering the program to the CPM for approval. Train all persons who will work on-site during construction.	2-Mar-01	7-Mar-01, Revised 12-Apr-01, 13-Jun-01, 10-Mar-03	29-May-01 13-Jun-01	Implemented for all project components. Training ongoing.
144	BIO-6a	The BRMIMP and ITP Section L requires that an annual report documenting planned maintenance activities on the gas pipelines be prepared.	31-Jan-19	10-Jan-19	-	Ongoing.
160	CUL-7	Train new employees and supply documentation on cultural awareness.	1-Apr-01	Training On-going	-	On-Going.
160	CUL-7(G)	Train new employees and supply documentation on cultural awareness.	8-Apr-02	Training On-going	-	On-Going.
160	CUL-7(W-North)	Train new employees and supply documentation on cultural awareness.	8-Apr-02	Training On-going	-	On-Going.
160	CUL-7(W-South)	Train new employees and supply documentation on cultural awareness.	15-Feb-02	Training On-going	-	On-Going.
59	GEN-9	Submit closure or decommissioning plan at least 12 months prior to closure activities.	-	-	-	Not Started.
127	HAZ-1	Listing of hazardous materials and quantities used on site.	Annual Report Requirement	-	-	Annual Report Requirement.
127	HAZ-2	Maintain a listing of all aqueous ammonia delivery quantities and delivery times, provide listing of all aqueous ammonia deliveries in the Annual Compliance Report.	Annual Report Requirement	-	-	Annual Report Requirement.
196	NOISE-2	Within thirty (30) days of receiving a noise complaint, file a noise complaint resolution form documenting claim and mitigation.	3-Apr-01	N/A	N/A	Ongoing. No noise complaints have been received.
Order No. 09-1118-5	SOIL & WATER-1		Monthly	7/13/2018, 8/21/18, 9/11/18, 10/04/18, 11/13/18, 12/11/18, 1/08/2019, 2/11/19, 3/12/19, 4/04/19 5/08/19 6/07/19		Submitted.
Order No. 06-0719-2	SOIL & WATER-4	Install and operate UV system as part of the Aquifer Banking System (ABS).	21-Jun-07			Ongoing. UV system is installed and will be operating during ABS injection activities, should HDPP elect to resume direct injection subsequent to obtaining a RWQCB permit.
233	SOIL & WATER-5a	Calculation of Balance: Submit quarterly reports for water banked and withdrawn.	Quarterly	2nd Qtr18: 16-Jul-18. 3rd Qtr18: 10-Oct-18. 4thQtr 18: 09-Jan-19. 1st Qtr19: 16-Apr-19.	-	Ongoing.

2018 - 2019 Compliance Matrix

Final Decision Page #	CEC Condition Number	Condition Verification Action/Submittal Summary	Due Date	Actual Submittal Date	Approval Date	Status
233	SOIL & WATER-5c	Calculation of Balance: Submit annual estimate of water to be banked and withdrawn. Quarterly estimates required when the balance is less than one full year of backup water supply plus 1,000 acre-feet.	Quarterly (when below 5,000 acre feet in bank. Annual when above.)	See S&W5b	-	Submitted.
234	SOIL & WATER-6	Banked Water Available for Project Use. Same verification as Soil & Water - 5 requiring monthly accounting of groundwater pumped and all SWP water treated and injected / banked.	-	-	-	In Progress. See SOIL & WATER-5b.
235	SOIL & WATER-7	If transfer of water treatment facilities is desired, owner must apply for an amendment to the CEC decision.	-	-	-	No plans to transfer facility.
238	SOIL & WATER-12	Submit a water treatment and monitoring plan that specifies the type and characteristics of the treatment processes and identify any waste streams and their disposal methods.	1-Jun-02	Last Revised 12-May-12.	-	Submitted.
239	SOIL & WATER-13a	Submit any proposed changes to water banking treatment process for approval, including any amounts of injection with treatment process in upset condition.	N/A	NA	-	Most recent version of Plan dated 12-May-12. Will need to be revised and resubmitted prior to resumption of injection activities, which are not planned at this time.
239	SOIL & WATER-13b	Submit Annual report of monitoring results as specified by the Water Treatment and Monitoring Plan.	NA	NA	-	Plant currently does not have permit or waiver from Regional Water Quality Control Board to inject, and no injection activities occurred during this reporting term.
239	SOIL & WATER-14	Submit copies of any receipt of request for the Air Force to examine or remediate any contaminated soil or ground water within two (2) weeks of receipt.	N/A	N/A	-	No requests received.
241	SOIL & WATER-18	Provide accounting of all groundwater injected, water pumped from wells for the project, and water pumped from wells for VVWD (Same report as S&W-5b).	15-Apr-03	-	-	Information submitted with S&W-5 monthly report for first year of operations and quarterly reports thereafter.
Order No. 09-1118-5	SOIL & WATER-20	30 days prior to the use of reclaimed water, provide copy of cross connection inspection and approval report from the Department of Public Health.	14-Jun-11	20-Dec-10, additional information provided 6-Jan-11.	7-Jan-11	Submitted.
Order No. 09-1118-5	SOIL & WATER-20	Submit two copies of the executed Reclaimed Water Service Agreement	14-Jun-11	18-Oct-10		Submitted.
Order No. 09-1118-5	SOIL & WATER-21	10 days prior to the use of reclaimed water, submit evidence that metering devices have been installed and are operational on the reclaimed water line. Provide monthly summary of daily water use by the power plant.	14-Jun-11	18-Oct-10		Submitted. Monthly summary of daily water use is provided in Attachment F.
267	VIS-1 (Operations)	Provide a status report regarding the treatment maintenance plan in the Annual Compliance Report.	Annual Report Requirement	-	-	On Going. See Attachment E.

2018 - 2019 Compliance Matrix

Final Decision Page #	CEC Condition Number	Condition Verification Action/Submittal Summary	Due Date	Actual Submittal Date	Approval Date	Status
183	WASTE-1 (Operations)	Summarize planned versus actual waste management activities in Annual Compliance Report.	Annual Report Requirement	-	6-Mar-03	Summary of planned versus actual waste management activities an Annual Report Requirement.
184	WASTE-3	Notify CPM of any hazardous material related enforcement action taken or pending against the site or any waste hauler, or treatment, storage, or disposal facility with which it contracts.	As Needed	-	-	On Going. No enforcement actions taken or pending against HDPP or any contracted hazardous waste hauler, or treatment, storage, or disposal facility.

**ATTACHMENT B**

**HAZARDOUS CHEMICALS USED AT HDPP  
ABOVE REPORTABLE QUANTITIES**



Chemical Inventory Summary  
High Desert Power Project  
CEC Compliance Report

Name of Hazardous Material	Maximum Quantity	Average Quantity	Size of Largest Container	Unit of Measure	Listed in Appendix A?	Reportable Quantity Pounds (of hazardous component unless otherwise noted)	Maximum Storage Quantity Pounds of CERCLA Hazardous Chemicals	Container Type
Lubricating and Hydraulic Oil	25,300	25,300	9,500	Gallons	Yes	42 gallons	NA	Above Ground Tank System
Battery Acid (Sulfuric Acid)	4,199	4,199				1,000	4,199	
Lead/Lead Oxide/Lead Alloy	29,811	29,811				10	29,811	
RO Cleaner (Caustic Mixture)	440	200	55	Gallons	No	1,000	241	Drum
Acetylene	1,000	750	125	Cubic Ft	No	None	NA	Cylinders
Ammonia Hydroxide 19%	400	200	400	Gallons	Yes	1,000	3,900	Tote
Ammonia Hydroxide 29%	37,500	24,000	40,000	Gallons	No	1,000	284,430	Above Ground Tank
Antifoam	1,060	600	400	Gallons	No	None	NA	Tote
Argon	3,080	3,080	280	Cubic Ft	No	None	NA	Cylinders
Biocide	1,390	450	400	Gallons	Yes	None	NA	Tote
Calcium Carbonate	4,000	2,000	50	Pounds	Yes	None	NA	Bags
Calcium Hydroxide (solid)	6,900	2,300	6,900	Pounds	Yes	None	NA	Silo
Carbohydrazide (Elinim-Ox)	1,060	600	400	Gallons	Yes	None	NA	Tote
Carbon Dioxide	24	24	6	Tons	No	None	NA	Above Ground Tank
Citric Acid Solution - 40%	1,390	600	400	Gallons	No	None	NA	Tote
Compressed Gas N.O.S. (CEMS Calibration Bottles)	3,750	3,000	125	Cubic Ft	No	None	NA	Cylinders
Copolymer of Quaternary Acrylaten Salt and Acrylamide (5%)	4,000	1,500	50	Pounds	Yes	5,000	200	Bags
Diesel	1,520	1,000	1,000	Gallons	No	42 gallons	NA	Above Ground Tank, Drum
Ferric Sulfate - 35% (Coagulant)	8,000	5,700	8,000	Gallons	Yes	1,000	23,000	Above Ground Tank
Granulated Activated Carbon	2,000	1,000	50	Pounds	No	None	NA	Bags
Hydrochloric Acid 32%	920	400	700	Gallons	No	5,000	2,950	Above Ground Tank , 55 Gallon Drums
Hydrogen	850	425	850	Pounds	Yes	None	NA	Trailer
Kerosene	220	125	55	Gallons	No	42 gallons	NA	Drum
Lead Acid Batteries (304 batteries onsite)			13.8	Pounds	Yes			Batteries
Magnesium Chloride - 31%	10,000	6,000	10,000	Gallons	No	None	NA	Above Ground Tank
Nitrogen	12,000	6,000	300	Cubic Ft	No	None	NA	Cylinders
Oxygen	5,000	2,000	250	Cubic Ft	No	None	NA	Cylinders
Phosphoric Acid	1,200	600	400	Gallons	Yes	None	NA	Tote
Propane	110	100	8	Gallons	No	1,000	466	Cylinders
Propylene Glycol	1,480	1,000	330	Gallons	No	None	NA	Totes

Chemical Inventory Summary  
High Desert Power Project  
CEC Compliance Report

Name of Hazardous Material	Maximum Quantity	Average Quantity	Size of Largest Container	Unit of Measure	Listed in Appendix A?	Reportable Quantity Pounds (of hazardous component unless otherwise noted)	Maximum Storage Quantity Pounds of CERCLA Hazardous Chemicals	Container Type
Purate (Hydrogren Peroxide and Sodium Chlorate mixture)	6,000	3,660	6,100	Gallons	No	1,000	6,840	Tank
RO Antiscalant (No TSCA Chemicals)	1,390	800	400	Gallons	No	None	NA	Tote
RO Cleaner ( Acid Mixture)	440	200	55	Gallons	No	5,000	1,169	Drum
Scale Inhibitor (No TSCA Chemicals)	1,720	400	400	Gallons	No	None	NA	Tote
Silica Sand	42,000	20,000	50	Pounds	No	None	NA	Bags
Sodium Bisulfite - 38%	2,060	700	1,400	Gallons	Yes	5,000	6,086	Above Ground Tank, Totes
Sodium Carbonate (Soda Ash)	130,000	130,000	52,000	Pounds	Yes	None	NA	Silo
Sodium Hydroxide - 50%	7,890	4,500	6,900	Gallons	Yes	1,000	13,700	Above Ground Tank
Sodium Hypochlorite - 12.5%	8,660	5,980	8,000	Gallons	Yes	100	9,800	Above Ground Tank and Tote
Sodium Nitrate	110	55	55	Gallons	No	100	110	Drum
Sodium Phosphate Mixture	800	600	400	Gallons	Yes	5,000	287	Drum
Sulfur Hexafluoride Gas	780	780	115	Pounds	No	None	NA	Cylinders
Sulfuric Acid - 93%	11,980	6,000	10,000	Gallons	Yes	1,000	142,290	Above Ground Tank, Totes
Transformer Insulating Oil	78,600	78,600	16,000	Gallons	Yes	42 gallons	NA	Transformers
Tri-Sodium EDTA	1,100	550	55	Gallons	No	None	NA	Drum

## **ATTACHMENT C**

### **AMMONIA DELIVERY LOG**

The attached spreadsheet lists all deliveries of aqueous ammonia, including the amount delivered, time of delivery, and time of sunrise and time of sunset.

HDPP uses aqueous ammonia to control NO<sub>x</sub> emissions from its combustion turbines. CEC Condition HAZ-2 requires that HDPP accept deliveries of aqueous ammonia no earlier than sunrise and no later than one hour prior to sunset. The attached log documents compliance with this requirement.

**ATTACHMENT C  
AMMONIA DELIVERY LOG  
JULY 2018 - JUNE 2019**

<b>Date Delivered</b>	<b>Time Delivered</b>	<b>Sunrise</b>	<b>Sunset</b>	<b>Date Ordered</b>	<b>Quantity Delivered (Tons)</b>
7/10/2018	13:20	5:45	20:05	7/3/2018	6.48
7/12/2018	8:20	5:46	20:04	7/6/2018	6.52
7/16/2018	7:45	5:48	20:02	7/13/2018	6.44
7/23/2018	13:15	5:53	19:59	7/19/2018	6.45
7/27/2018	7:47	5:56	19:56	7/25/2018	6.49
8/1/2018	13:30	5:59	19:52	7/30/2018	6.49
8/8/2018	12:40	6:03	19:47	8/6/2018	6.52
8/15/2018	11:19	6:10	19:38	8/9/2018	6.42
8/22/2018	14:50	6:15	19:30	8/20/2018	6.47
8/27/2018	11:10	6:19	19:23	8/20/2018	6.49
9/4/2018	13:01	6:24	19:13	8/22/2018	8.24
9/10/2018	14:56	6:29	19:04	9/4/2018	6.43
9/14/2018	8:41	6:31	18:59	9/12/2018	6.46
9/19/2018	10:50	6:35	18:52	9/13/2018	6.51
9/27/2018	14:00	6:41	18:40	9/20/2018	6.38
10/3/2018	12:53	6:45	18:32	9/20/2018	6.40
10/5/2018	12:40	6:47	18:29	10/1/2018	6.49
10/12/2018	14:21	6:52	18:20	10/10/2018	6.49

**ATTACHMENT C  
AMMONIA DELIVERY LOG  
JULY 2018 - JUNE 2019**

<b>Date Delivered</b>	<b>Time Delivered</b>	<b>Sunrise</b>	<b>Sunset</b>	<b>Date Ordered</b>	<b>Quantity Delivered (Tons)</b>
10/19/2018	13:00	6:58	18:11	10/19/2018	6.38
10/24/2018	14:15	7:02	18:05	10/19/2018	6.58
10/29/2018	11:45	7:06	18:00	10/26/2018	6.47
10/31/2018	12:51	7:08	17:58	10/26/2018	6.38
11/7/2018	13:37	6:15	16:51	11/2/2018	6.36
11/13/2018	14:20	6:20	16:47	11/9/2018	6.58
11/16/2018	10:40	6:23	16:45	11/9/2018	6:47
11/20/2018	14:25	6:27	16:42	11/9/2018	6.48
11/23/2018	14:20	6:30	16:41	11/9/2018	6.59
11/27/2018	8:45	6:34	16:40	11/12/2018	6.50
11/30/2018	7:05	6:30	16:41	11/30/2018	6.50
12/5/2018	13:37	6:41	16:39	12/3/2018	6.49
12/10/2018	13:45	6:45	16:39	12/5/2018	6.50
12/17/2018	9:25	6:50	16:41	12/5/2018	6.42
12/20/2018	12:45	6:51	16:42	12/12/2018	6.50
12/26/2018	13:10	6:54	16:45	12/12/2018	6.46
1/8/2019	13:51	6:57	16:55	12/12/2018	6.55
1/16/2019	9:00	6:56	17:02	1/22/2019	6.50

**ATTACHMENT C  
AMMONIA DELIVERY LOG  
JULY 2018 - JUNE 2019**

<b>Date Delivered</b>	<b>Time Delivered</b>	<b>Sunrise</b>	<b>Sunset</b>	<b>Date Ordered</b>	<b>Quantity Delivered (Tons)</b>
1/21/2019	13:45	6:54	17:07	1/16/2019	6.50
1/29/2019	11:30	6:50	17:15	1/16/2019	6.54
2/8/2019	12:45	6:42	17:25	2/7/2019	6.52
2/14/2019	11:44	6:36	17:31	2/7/2019	6.50
2/18/2019	13:20	6:32	17:34	2/13/2019	6.39
2/22/2019	12:40	6:28	17:38	2/15/2019	6.50
2/26/2019	8:10	6:23	17:42	2/22/2019	6.47
3/4/2019	10:30	6:15	17:47	2/22/2019	6.54
3/11/2019	9:35	7:06	18:53	2/27/2019	6.49
3/15/2019	13:10	7:01	18:56	3/15/2019	6.50
3/22/2019	14:15	6:51	19:02	3/15/2019	6.44
3/28/2019	14:44	6:43	19:06	3/15/2019	6.66
3/29/2019	13:00	6:41	19:07	3/25/2019	6.49
4/3/2019	13:15	6:35	19:11	4/2/2019	6.49
4/25/2019	9:58	6:07	19:28	4/18/2019	6.50
5/7/2019	8:10	5:54	19:38	5/1/2019	6.58
5/14/2019	8:55	5:48	19:43	5/10/2019	6.46
6/5/2019	8:20	5:37	19:58	6/3/2019	6.41



## **ATTACHMENT D**

### **PLANNED VERSUS ACTUAL WASTE MANAGEMENT ACTIVITIES**

HDPP has reviewed its Operations Waste Management Plan (OWMP) (WASTE-1) and compared the plan with actual waste management activities. HDPP has implemented all of the waste management activities for all the waste streams indicated in the OWMP, which is attached for your convenience.



**SUMMARY OF WASTE STREAMS AND MANAGEMENT  
HIGH DESERT POWER PROJECT**

WASTE	DESCRIPTION	CLASSIFICATION	QUANTITY GENERATED	CONTAINER TYPES	OFFSITE MANAGEMENT METHOD	Actual Meets Plan?
ABS Clarifier Filter Press	Filter cake from clarification of SWP water.	NSW <sup>(1)</sup>	1 - 20 cu. yard bin every other day	Bulk bins	Class III Landfill or Beneficial Reuse (Composting)	Actual waste greatly reduced from plan due to lack of ABS injection and SWP water use.
Aerosol Cans	Aerosol cans are deposited into a 55-gallon drum. The waste management facility recycled cans and manages waste material.	Universal Waste Recyclable	2 - 55 gallon drum per year of aerosol cans	55-gallon top-opening DOT-Approved steel drums.	Recycled at licensed TSDF	Yes.
Air Filters	Used air filters generated during CTG maintenance.	NSW <sup>(1)</sup>	2- 20 cu. yard bin every 3 to 5 years	Bulk Bins	Class III Landfill	Yes.
Batteries – Dry Cell	Spent dry-cell batteries. Examples of these Universal Waste batteries include small alkaline batteries, Ni-Cad batteries, zinc-carbon batteries, lithium batteries, and mercury batteries.	Universal Waste Recyclable	1- 5-gallon container per year	1-5 Gallon DOT-Approved plastic container.	Recycled	Yes.
Batteries – Lead-Acid (Non-Automotive Type)	Spent wet-cell and gel-cell lead-acid batteries, other than batteries that are equivalent in type, and equivalent or smaller in size, to common vehicle batteries. Examples of these Universal Waste batteries include small consumer-type sealed gel-cell batteries and large utility batteries such as forklift batteries and large deep-cell power batteries.	Universal Waste Recyclable	500 pounds per year	Pallet or tote (in buckets if leaking or damaged).	Recycled	Yes.
Catalyst Cleaning Debris	Residual from boiler tube walls.	Non-RCRA Hazardous	1 – 55 gallon drum per maintenance 1-3 years	55-gallon top-opening DOT-Approved steel buckets or drums.	Disposal at licensed TSDF	Yes.
Cathode Ray Tubes (CRTs)	Broken and intact CRTs (i.e., “picture tubes”) from television and computer monitors and other electronic equipment.	Universal Waste	2 to 3 CRTs every 1-2 years.	Boxes for intact CRTs; boxes or top-opening fiber or steel drums for broken lamps.	Recycled	Yes.
Cooling Tower Filter Press	Filter cake from dewatering of cooling tower water.	NSW <sup>(1)</sup>	1 – 20 cu. yard bin every other day.	Bulk bins	Lined Class III Landfill or Beneficial Reuse (Composting)	Actual waste greatly reduced from plan due to reduced operating time.

**SUMMARY OF WASTE STREAMS AND MANAGEMENT  
HIGH DESERT POWER PROJECT**

WASTE	DESCRIPTION	CLASSIFICATION	QUANTITY GENERATED	CONTAINER TYPES	OFFSITE MANAGEMENT METHOD	Actual Meets Plan?
Crystallizer Solids	Residual from the crystallizer.	Designated <sup>(1)</sup>	10 cu. yards per week	Bulk bins	Class II Lined Landfill	Actual waste greatly reduced from plan due to reduced operating time.
Filter Media	Spent reverse osmosis membranes, ultrafilter membranes, and microfilter membranes from water treatment plant maintenance performed every 3 - 5 years.	NSW <sup>(1)</sup>	1 - 20 cu. Yard bin per 3- 5 years	Bin or Tote	Dispose in a Class III Landfill <sup>(1)</sup>	Yes.
Grease	Used grease generated by equipment maintenance or off-spec grease.	Non-RCRA Hazardous	1 - 55 gallon drum per year.	5- to 55-gallon top-opening DOT-Approved steel buckets or drums.	Disposal at licensed TSDF	Yes.
Lamps	Broken and intact spent lamps. Examples include fluorescent lamps, neon lamps, mercury vapor lamps, high-pressure sodium lamps and metal-halide lamps. Incandescent lamps (e.g., household-type lamps bulbs) are excluded and can be managed as NSW.	Universal Waste	200 pounds per year	Boxes for intact lamps; boxes or 1- to 5-gallon DOT-Approved plastic buckets for broken lamps.	Recycled	Yes.
Oil Filters	Drained lubricating and hydraulic oil filters generated by equipment maintenance.	Nonhazardous Waste	1000 lbs per year	55- gallon top-opening DOT-Approved steel drums.	Recycled for metal recovery	Yes.
Oil/Water Separator Sludge	Oily Solids generated by oil/water separator maintenance.	Non-RCRA Hazardous	As needed basis. Estimated 200 gallons every 3 years.	Extracted at the point of generation and transported offsite.	Disposal at licensed TSDF	Yes.
Oily Solids	Absorbent or other oily debris generated by maintenance, routine cleaning and spill cleanup, not contaminated with any hazardous material other than petroleum hydrocarbons.	Non-RCRA Hazardous	Approximately 4 to 8 – 55 gallon drums per year	35- to 55- gallon top-opening DOT-Approved steel drums.	Disposal at licensed TSDF	Yes.
Paint (latex)	Off-spec or other waste latex paint generated by equipment maintenance.	Non-RCRA Hazardous Waste	1 – 55 gallon drum per year	1- to 5 gallon DOT-Approved plastic buckets or 35- or 55- gallon bung-top DOT-Approved steel drums.	Disposal at licensed TSDF	Yes.
Paint (oil-base)	Off-spec or other waste oil-base paint generated by equipment maintenance.	RCRA Hazardous Waste	1 – 55 gallon drum per year	1- to 5 gallon DOT-Approved plastic buckets or 35- or 55- gallon	Disposal at licensed TSDF	Yes.

**SUMMARY OF WASTE STREAMS AND MANAGEMENT  
HIGH DESERT POWER PROJECT**

WASTE	DESCRIPTION	CLASSIFICATION	QUANTITY GENERATED	CONTAINER TYPES	OFFSITE MANAGEMENT METHOD	Actual Meets Plan?
				bung-top DOT-Approved steel drums.		
Paint Thinner	Off-spec or used paint thinner	RCRA Hazardous Waste	1 – 55 gallon drum per year	5-gallon steel DOT-Approved bung-top bucket or 35- or 55-gallon bung-top DOT-Approved steel drums.	Disposal at licensed TSDF	Yes.
Petroleum Solvents	Used or off-spec hydrocarbon solvents such as Stoddard solvent generated by equipment maintenance.	RCRA Hazardous Waste	2 – 55 gallon drum per year	5-gallon steel DOT-Approved bung-top bucket or 35- or 55-gallon bung-top DOT-Approved steel drums.	Disposal at licensed TSDF	Yes.
Reverse Osmosis Pre-filters	Monthly replacement of pre-filter media.	NSW <sup>(1)</sup>	0.4 cu. yard per month	Bin	Recycled or disposed at Class III landfill <sup>(1)</sup>	Yes.
Maintenance Debris	Waste sandblast and other debris.	TBD	5 – 55 gallon drum per maintenance event.	Drum, Tote or Bin	To be determined based on type of debris generated. Routine sandblast found to be nonhazardous. <sup>(1)</sup>	Yes.
SCR Catalyst	Used catalyst generated by maintenance of SCR system.	Non-RCRA Hazardous Waste	400 cu. yard every 3-5 years.	DOT-Approved bulk bins or DOT-Approved 55-gallon top-opening steel drums.	Disposal at licensed TSDF	Actual generation less than plan. Only 1 catalyst replacement to date.
Solvent Contaminated Debris	Rags, absorbent or other debris generated by maintenance activities or spill cleanup.	RCRA Hazardous Waste	1 – 55 gallon drum per year	5-gallon steel DOT-Approved top-opening buckets or 35- or 55-gallon top-opening DOT-Approved steel drums.	Disposal at licensed TSDF. Rags laundered at appropriate industrial laundry.	Yes.
Scrap Metal	Metal objects or metal workings, cuttings, shavings, etc, that are not contaminated with free-flowing used oil or other hazardous waste.	NSW	10 cu. yards	Bins or Totes	Recycled	Yes.
Turbine Blade Washdown Water	Drainage from turbine blade washdown.	Nonhazardous Industrial Wastewater	4000 gallons generated periodically	Storage Tank.	Recycled at licensed TSDF	Yes. Not generated during reporting term.

**SUMMARY OF WASTE STREAMS AND MANAGEMENT  
HIGH DESERT POWER PROJECT**

<b>WASTE</b>	<b>DESCRIPTION</b>	<b>CLASSIFICATION</b>	<b>QUANTITY GENERATED</b>	<b>CONTAINER TYPES</b>	<b>OFFSITE MANAGEMENT METHOD</b>	<b>Actual Meets Plan?</b>
Used Oil	Used oil generated by equipment maintenance or off-spec oil.	Non-RCRA Hazardous	Approximately 900 gallons per year accumulated in 55 gallon drums and shipped in bulk.	35- to 55-gallon bung-top DOT-Approved steel drums, and one 400 gallon aboveground storage tank used to store waste oil from cooling tower fans.	Recycled at licensed TSDF	Yes.
Continuous Deionized Water Cartridges	Spent cartridges generated during maintenance.	NSW <sup>(1)</sup>	3 cu. yards every 3 - 5 years	55-gallon top-opening DOT-Approved steel drums.	Recycled or disposed at Class III landfill	Yes.
Unspecified Non-hazardous Solid Waste	Paper, packaging, plastic glass, food waste, etc.	NSW	10 cu. yards per week	Dumpster or trash can	Recycled or disposed at a Class III landfill	Yes.
Crystallizer Brine Rinse Water	Rinse water generated during crystallizer maintenance that cannot be processed onsite.	Nonhazardous Industrial Wastewater	Approximately 28,000 gallons per month	4,000 gallon trucks.	Recycled at licensed TSDF	Yes.
Cooling Tower Blowdown Brine Water	Brine solution created during non-routine and unplanned system upset events that cannot be processed onsite.	Nonhazardous Industrial Wastewater	Indeterminate.	4,000 gallon trucks.	Disposed at licensed TSDF	Yes. Not generated during reporting term.

Notes:

- (1) Waste analysis and profile confirms this waste is non-hazardous. [Nonhazardous Solid Waste (NSW)]
- (2) Used oil filters are managed at HDPP pursuant to 22 CCR 66266.130 which allows for less stringent storage limitations than other hazardous wastes, including exemption to the 90-day storage limitation.
- (3) Waste classification dependent upon lab analysis.

**ATTACHMENT E**  
**VISUAL TREATMENT UPDATE**

CEC Condition VIS-1 requires HDPP to submit an update of the status report of the visual treatment maintenance plan. No architectural structures were visually treated during this compliance term. If required in the future, color treatment will be conducted in accordance with the structure color treatment maintenance plan.

**ATTACHMENT F**

**RECLAIMED WATER STATUS SUMMARY**

Condition of Certification Soil and Water-21 requires an update on the servicing and calibration of reclaimed water flowmeters. Based on manufacturer recommendations, the City of Victorville's two flowmeters (one serving as a backup in case of failure) should be calibrated once every two years while in service. The flowmeters were last calibrated in July 2017, and are scheduled for calibration during the 3<sup>rd</sup> quarter of 2019.

Condition of Certification Soil and Water-21 also requires an annual summary of daily water use to be included in the annual compliance report. The annual summary of daily water use is included in the following pages.

Appendix F Daily Water Use Summary

Date	SWP GPD	Wells GPD	RW GPD	Total GPD	SWP/Total Ratio	Well/Total Ratio	RW/Total Ratio
July 1, 2018	0	472,736	580,424	1,053,160	0%	45%	55%
July 2, 2018	0	1,901,416	634,355	2,535,771	0%	75%	25%
July 3, 2018	0	1,102,552	676,448	1,779,000	0%	62%	38%
July 4, 2018	0	1,306,756	650,580	1,957,336	0%	67%	33%
July 5, 2018	0	1,633,632	1,308,729	2,942,361	0%	56%	44%
July 6, 2018	0	2,742,168	1,264,650	4,006,818	0%	68%	32%
July 7, 2018	0	3,193,960	1,423,490	4,617,450	0%	69%	31%
July 8, 2018	0	3,109,436	1,282,116	4,391,552	0%	71%	29%
July 9, 2018	0	3,330,096	1,286,006	4,616,102	0%	72%	28%
July 10, 2018	0	2,672,604	1,237,308	3,909,912	0%	68%	32%
July 11, 2018	0	2,684,572	1,151,429	3,836,001	0%	70%	30%
July 12, 2018	0	2,918,696	785,396	3,704,092	0%	79%	21%
July 13, 2018	0	3,087,744	923,242	4,010,986	0%	77%	23%
July 14, 2018	0	2,775,080	860,227	3,635,307	0%	76%	24%
July 15, 2018	0	2,517,020	549,778	3,066,798	0%	82%	18%
July 16, 2018	0	2,327,028	903,196	3,230,224	0%	72%	28%
July 17, 2018	0	2,721,224	1,132,695	3,853,919	0%	71%	29%
July 18, 2018	0	3,060,068	1,007,302	4,067,370	0%	75%	25%
July 19, 2018	0	1,599,224	1,155,295	2,754,519	0%	58%	42%
July 20, 2018	0	3,670,436	1,276,146	4,946,582	0%	74%	26%
July 21, 2018	0	2,775,828	1,148,040	3,923,868	0%	71%	29%
July 22, 2018	0	2,853,620	1,120,330	3,973,950	0%	72%	28%
July 23, 2018	0	3,685,396	1,275,464	4,960,860	0%	74%	26%
July 24, 2018	0	3,006,960	1,177,951	4,184,911	0%	72%	28%
July 25, 2018	0	2,429,504	894,518	3,324,022	0%	73%	27%
July 26, 2018	0	2,294,116	830,092	3,124,208	0%	73%	27%
July 27, 2018	0	1,803,428	819,016	2,622,444	0%	69%	31%
July 28, 2018	0	1,485,528	1,020,372	2,505,900	0%	59%	41%
July 29, 2018	0	2,247,740	1,188,068	3,435,808	0%	65%	35%
July 30, 2018	0	3,339,072	1,174,326	4,513,398	0%	74%	26%
July 31, 2018	0	3,466,980	1,281,116	4,748,096	0%	73%	27%
August 1, 2018	0	3,080,264	1,273,980	4,354,244	0%	71%	29%
August 2, 2018	0	3,081,760	1,229,207	4,310,967	0%	71%	29%
August 3, 2018	0	1,577,532	733,681	2,311,213	0%	68%	32%
August 4, 2018	0	1,688,236	853,656	2,541,892	0%	66%	34%
August 5, 2018	0	2,091,408	772,813	2,864,221	0%	73%	27%
August 6, 2018	0	2,456,432	898,449	3,354,881	0%	73%	27%
August 7, 2018	0	2,246,244	981,135	3,227,379	0%	70%	30%
August 8, 2018	0	3,062,312	1,018,048	4,080,360	0%	75%	25%
August 9, 2018	0	3,184,236	1,306,363	4,490,599	0%	71%	29%
August 10, 2018	0	2,019,600	703,773	2,723,373	0%	74%	26%
August 11, 2018	0	1,342,660	382,035	1,724,695	0%	78%	22%

August 12, 2018	0	1,271,600	544,111	1,815,711	0%	70%	30%
August 13, 2018	0	1,900,668	780,515	2,681,183	0%	71%	29%
August 14, 2018	0	2,929,168	1,109,607	4,038,775	0%	73%	27%
August 15, 2018	0	3,052,588	1,123,799	4,176,387	0%	73%	27%
August 16, 2018	0	2,756,380	1,141,049	3,897,429	0%	71%	29%
August 17, 2018	0	2,311,320	1,000,119	3,311,439	0%	70%	30%
August 18, 2018	0	2,615,756	1,158,786	3,774,542	0%	69%	31%
August 19, 2018	0	2,883,540	1,174,385	4,057,925	0%	71%	29%
August 20, 2018	0	3,933,792	1,191,513	5,125,305	0%	77%	23%
August 21, 2018	0	2,616,444	1,024,577	3,641,021	0%	72%	28%
August 22, 2018	0	1,395,768	599,910	1,995,678	0%	70%	30%
August 23, 2018	0	1,834,096	571,165	2,405,261	0%	76%	24%
August 24, 2018	0	1,319,472	605,332	1,924,804	0%	69%	31%
August 25, 2018	0	1,607,452	576,862	2,184,314	0%	74%	26%
August 26, 2018	0	1,589,500	583,858	2,173,358	0%	73%	27%
August 27, 2018	0	2,038,300	665,552	2,703,852	0%	75%	25%
August 28, 2018	0	2,475,880	978,580	3,454,460	0%	72%	28%
August 29, 2018	0	2,568,632	1,008,320	3,576,952	0%	72%	28%
August 30, 2018	0	2,769,844	1,047,522	3,817,366	0%	73%	27%
August 31, 2018	0	2,103,376	707,780	2,811,156	0%	75%	25%
September 1, 2018	0	1,265,616	555,663	1,821,279	0%	69%	31%
September 2, 2018	0	1,315,732	526,725	1,842,457	0%	71%	29%
September 3, 2018	0	1,386,792	587,777	1,974,569	0%	70%	30%
September 4, 2018	0	1,469,072	454,966	1,924,038	0%	76%	24%
September 5, 2018	0	1,609,696	631,491	2,241,187	0%	72%	28%
September 6, 2018	0	4,443,120	1,054,574	5,497,694	0%	81%	19%
September 7, 2018	0	2,150,500	1,120,400	3,270,900	0%	66%	34%
September 8, 2018	0	2,127,312	1,091,658	3,218,970	0%	66%	34%
September 9, 2018	0	2,777,324	1,092,053	3,869,377	0%	72%	28%
September 10, 2018	0	2,744,412	1,055,037	3,799,449	0%	72%	28%
September 11, 2018	0	2,802,008	1,041,863	3,843,871	0%	73%	27%
September 12, 2018	0	1,484,780	593,480	2,078,260	0%	71%	29%
September 13, 2018	0	2,585,836	1,062,058	3,647,894	0%	71%	29%
September 14, 2018	0	3,078,768	1,126,890	4,205,658	0%	73%	27%
September 15, 2018	0	2,540,956	1,128,343	3,669,299	0%	69%	31%
September 16, 2018	0	3,404,148	1,097,298	4,501,446	0%	76%	24%
September 17, 2018	0	3,091,484	1,176,322	4,267,806	0%	72%	28%
September 18, 2018	0	2,373,404	1,021,850	3,395,254	0%	70%	30%
September 19, 2018	0	2,333,760	1,012,593	3,346,353	0%	70%	30%
September 20, 2018	0	2,546,940	1,071,071	3,618,011	0%	70%	30%
September 21, 2018	0	2,659,140	1,091,793	3,750,933	0%	71%	29%
September 22, 2018	0	3,406,392	1,050,908	4,457,300	0%	76%	24%
September 23, 2018	0	2,065,976	1,019,831	3,085,807	0%	67%	33%
September 24, 2018	0	2,917,200	1,007,377	3,924,577	0%	74%	26%



September 25, 2018	0	2,687,564	1,064,862	3,752,426	0%	72%	28%
September 26, 2018	0	2,782,560	1,146,643	3,929,203	0%	71%	29%
September 27, 2018	0	2,663,628	1,103,459	3,767,087	0%	71%	29%
September 28, 2018	0	3,195,456	1,077,905	4,273,361	0%	75%	25%
September 29, 2018	0	1,415,964	563,105	1,979,069	0%	72%	28%
September 30, 2018	0	1,093,576	557,909	1,651,485	0%	66%	34%
October 1, 2018	0	2,510,288	707,484	3,217,772	0%	78%	22%
October 2, 2018	0	2,905,980	1,084,218	3,990,198	0%	73%	27%
October 3, 2018	0	2,481,864	985,492	3,467,356	0%	72%	28%
October 4, 2018	0	2,089,912	944,250	3,034,162	0%	69%	31%
October 5, 2018	0	2,856,612	938,102	3,794,714	0%	75%	25%
October 6, 2018	0	1,870,000	589,920	2,459,920	0%	76%	24%
October 7, 2018	0	1,000,824	458,104	1,458,928	0%	69%	31%
October 8, 2018	0	1,083,852	502,220	1,586,072	0%	68%	32%
October 9, 2018	0	1,799,688	610,964	2,410,652	0%	75%	25%
October 10, 2018	0	1,948,540	840,735	2,789,275	0%	70%	30%
October 11, 2018	0	2,991,252	771,866	3,763,118	0%	79%	21%
October 12, 2018	0	1,863,268	653,678	2,516,946	0%	74%	26%
October 13, 2018	0	1,937,320	653,369	2,590,689	0%	75%	25%
October 14, 2018	0	997,832	384,964	1,382,796	0%	72%	28%
October 15, 2018	0	1,074,876	407,105	1,481,981	0%	73%	27%
October 16, 2018	0	2,101,880	931,009	3,032,889	0%	69%	31%
October 17, 2018	0	2,433,244	708,565	3,141,809	0%	77%	23%
October 18, 2018	0	2,566,388	605,393	3,171,781	0%	81%	19%
October 19, 2018	0	3,351,788	1,021,086	4,372,874	0%	77%	23%
October 20, 2018	0	1,980,704	1,131,956	3,112,660	0%	64%	36%
October 21, 2018	0	1,765,280	839,341	2,604,621	0%	68%	32%
October 22, 2018	0	1,810,908	1,129,213	2,940,121	0%	62%	38%
October 23, 2018	0	2,278,408	1,081,568	3,359,976	0%	68%	32%
October 24, 2018	0	2,721,972	1,038,503	3,760,475	0%	72%	28%
October 25, 2018	0	2,636,700	1,135,944	3,772,644	0%	70%	30%
October 26, 2018	0	2,457,928	1,244,538	3,702,466	0%	66%	34%
October 27, 2018	0	2,856,612	1,036,983	3,893,595	0%	73%	27%
October 28, 2018	0	2,655,400	1,044,034	3,699,434	0%	72%	28%
October 29, 2018	0	2,383,876	963,809	3,347,685	0%	71%	29%
October 30, 2018	0	2,617,252	955,150	3,572,402	0%	73%	27%
October 31, 2018	0	1,626,900	394,733	2,021,633	0%	80%	20%
November 1, 2018	0	2,303,092	1,001,332	3,304,424	0%	70%	30%
November 2, 2018	0	2,931,412	999,485	3,930,897	0%	75%	25%
November 3, 2018	0	1,890,196	557,049	2,447,245	0%	77%	23%
November 4, 2018	0	2,466,156	1,007,558	3,473,714	0%	71%	29%
November 5, 2018	0	2,379,388	979,853	3,359,241	0%	71%	29%
November 6, 2018	0	2,167,704	920,248	3,087,952	0%	70%	30%
November 7, 2018	0	2,379,388	395,939	2,775,327	0%	86%	14%

November 8, 2018	0	2,269,432	976,865	3,246,297	0%	70%	30%
November 9, 2018	0	2,887,280	975,293	3,862,573	0%	75%	25%
November 10, 2018	0	2,443,716	990,152	3,433,868	0%	71%	29%
November 11, 2018	0	2,551,428	979,373	3,530,801	0%	72%	28%
November 12, 2018	0	2,191,640	1,002,042	3,193,682	0%	69%	31%
November 13, 2018	0	2,161,720	1,034,797	3,196,517	0%	68%	32%
November 14, 2018	0	2,796,024	971,188	3,767,212	0%	74%	26%
November 15, 2018	0	2,489,344	1,001,285	3,490,629	0%	71%	29%
November 16, 2018	0	2,401,080	990,426	3,391,506	0%	71%	29%
November 17, 2018	0	2,382,380	1,021,752	3,404,132	0%	70%	30%
November 18, 2018	0	2,564,892	1,067,250	3,632,142	0%	71%	29%
November 19, 2018	0	2,713,744	1,063,166	3,776,910	0%	72%	28%
November 20, 2018	0	2,517,020	970,311	3,487,331	0%	72%	28%
November 21, 2018	0	1,911,888	960,836	2,872,724	0%	67%	33%
November 22, 2018	0	2,191,640	210,785	2,402,425	0%	91%	9%
November 23, 2018	0	0	0	0	0%	0%	0%
November 24, 2018	0	0	380,735	380,735	0%	0%	100%
November 25, 2018	0	1,298,528	194,986	1,493,514	0%	87%	13%
November 26, 2018	0	1,793,704	107,216	1,900,920	0%	94%	6%
November 27, 2018	0	2,766,852	414,965	3,181,817	0%	87%	13%
November 28, 2018	0	1,903,660	658,466	2,562,126	0%	74%	26%
November 29, 2018	0	1,674,024	271,045	1,945,069	0%	86%	14%
November 30, 2018	0	1,395,768	0	1,395,768	0%	100%	0%
December 1, 2018	0	1,605,956	0	1,605,956	0%	100%	0%
December 2, 2018	0	0	0	0	0%	0%	0%
December 3, 2018	0	1009800	959,676	1,969,476	0%	51%	49%
December 4, 2018	0	1855788	896,520	2,752,308	0%	67%	33%
December 5, 2018	0	2369664	794,468	3,164,132	0%	75%	25%
December 6, 2018	0	2742916	562,048	3,304,964	0%	83%	17%
December 7, 2018	0	1984444	755,332	2,739,776	0%	72%	28%
December 8, 2018	0	1926100	418,527	2,344,627	0%	82%	18%
December 9, 2018	0	1973972	437,266	2,411,238	0%	82%	18%
December 10, 2018	0	1508716	694,382	2,203,098	0%	68%	32%
December 11, 2018	0	2977788	913,374	3,891,162	0%	77%	23%
December 12, 2018	0	1711424	727,657	2,439,081	0%	70%	30%
December 13, 2018	0	1772012	823,912	2,595,924	0%	68%	32%
December 14, 2018	0	1989680	1,094,350	3,084,030	0%	65%	35%
December 15, 2018	0	1786224	823,684	2,609,908	0%	68%	32%
December 16, 2018	0	1476552	861,036	2,337,588	0%	63%	37%
December 17, 2018	0	1602216	707,747	2,309,963	0%	69%	31%
December 18, 2018	0	1850552	821,490	2,672,042	0%	69%	31%
December 19, 2018	0	2025584	811,880	2,837,464	0%	71%	29%
December 20, 2018	0	1682252	773,450	2,455,702	0%	69%	31%
December 21, 2018	0	1582768	804,124	2,386,892	0%	66%	34%

December 22, 2018	0	1678512	709,514	2,388,026	0%	70%	30%
December 23, 2018	0	982872	0	982,872	0%	100%	0%
December 24, 2018	0	0	0	0	0%	0%	0%
December 25, 2018	0	0	0	0	0%	0%	0%
December 26, 2018	0	308924	306,330	615,254	0%	50%	50%
December 27, 2018	0	734536	0	734,536	0%	100%	0%
December 28, 2018	0	0	0	0	0%	0%	0%
December 29, 2018	0	0	0	0	0%	0%	0%
December 30, 2018	0	0	0	0	0%	0%	0%
December 31, 2018	0	0	0	0	0%	0%	0%
January 1, 2019	0	0	0	0	0%	0%	0%
January 2, 2019	0	237,116	346,087	583,203	0%	41%	59%
January 3, 2019	0	1,319,472	403,654	1,723,126	0%	77%	23%
January 4, 2019	0	908,820	728,715	1,637,535	0%	55%	45%
January 5, 2019	0	687,412	315,414	1,002,826	0%	69%	31%
January 6, 2019	0	1,251,404	212,505	1,463,909	0%	85%	15%
January 7, 2019	0	1,096,568	370,823	1,467,391	0%	75%	25%
January 8, 2019	0	1,986,688	390,220	2,376,908	0%	84%	16%
January 9, 2019	0	3,192,464	0	3,192,464	0%	100%	0%
January 10, 2019	0	3,220,140	115,800	3,335,940	0%	97%	3%
January 11, 2019	0	2,694,296	1,024,727	3,719,023	0%	72%	28%
January 12, 2019	0	1,072,632	67,285	1,139,917	0%	94%	6%
January 13, 2019	0	0	286,785	286,785	0%	0%	100%
January 14, 2019	0	931,260	388,764	1,320,024	0%	71%	29%
January 15, 2019	0	1,763,784	1,015,538	2,779,322	0%	63%	37%
January 16, 2019	0	1,450,372	756,734	2,207,106	0%	66%	34%
January 17, 2019	0	1,234,948	378,851	1,613,799	0%	77%	23%
January 18, 2019	0	1,747,328	872,036	2,619,364	0%	67%	33%
January 19, 2019	0	1,237,192	2,953	1,240,145	0%	100%	0%
January 20, 2019	0	0	0	0	0%	0%	0%
January 21, 2019	0	166,056	164,015	330,071	0%	50%	50%
January 22, 2019	0	910,316	351,752	1,262,068	0%	72%	28%
January 23, 2019	0	922,284	419,586	1,341,870	0%	69%	31%
January 24, 2019	0	1,767,524	730,356	2,497,880	0%	71%	29%
January 25, 2019	0	1,616,428	590,032	2,206,460	0%	73%	27%
January 26, 2019	0	1,332,936	750,298	2,083,234	0%	64%	36%
January 27, 2019	0	1,423,444	368,886	1,792,330	0%	79%	21%
January 28, 2019	0	1,027,752	480,990	1,508,742	0%	68%	32%
January 29, 2019	0	1,733,864	482,876	2,216,740	0%	78%	22%
January 30, 2019	0	2,077,944	305,234	2,383,178	0%	87%	13%
January 31, 2019	0	2,292,620	511,378	2,803,998	0%	82%	18%
February 1, 2019	0	2,337,500	626,261	2,963,761	0%	79%	21%
February 2, 2019	0	2,228,292	562,903	2,791,195	0%	80%	20%
February 3, 2019	0	867,680	286,714	1,154,394	0%	75%	25%

February 4, 2019	0	2,495,328	388,351	2,883,679	0%	87%	13%
February 5, 2019	0	2,577,608	906,207	3,483,815	0%	74%	26%
February 6, 2019	0	2,024,088	359,796	2,383,884	0%	85%	15%
February 7, 2019	0	3,069,792	831,681	3,901,473	0%	79%	21%
February 8, 2019	0	2,002,396	475,766	2,478,162	0%	81%	19%
February 9, 2019	0	1,550,604	229,730	1,780,334	0%	87%	13%
February 10, 2019	0	2,231,284	507,123	2,738,407	0%	81%	19%
February 11, 2019	0	1,384,548	520,064	1,904,612	0%	73%	27%
February 12, 2019	0	1,893,936	728,418	2,622,354	0%	72%	28%
February 13, 2019	0	1,883,464	980,094	2,863,558	0%	66%	34%
February 14, 2019	0	2,054,756	863,952	2,918,708	0%	70%	30%
February 15, 2019	0	2,756,380	812,818	3,569,198	0%	77%	23%
February 16, 2019	0	1,552,848	238,983	1,791,831	0%	87%	13%
February 17, 2019	0	1,819,884	464,039	2,283,923	0%	80%	20%
February 18, 2019	0	1,775,004	637,225	2,412,229	0%	74%	26%
February 19, 2019	0	2,175,932	735,399	2,911,331	0%	75%	25%
February 20, 2019	0	1,739,848	444,070	2,183,918	0%	80%	20%
February 21, 2019	0	1,916,376	638,449	2,554,825	0%	75%	25%
February 22, 2019	0	1,660,560	532,133	2,192,693	0%	76%	24%
February 23, 2019	0	1,715,164	597,270	2,312,434	0%	74%	26%
February 24, 2019	0	1,950,036	670,031	2,620,067	0%	74%	26%
February 25, 2019	0	2,014,364	941,774	2,956,138	0%	68%	32%
February 26, 2019	0	2,163,216	740,869	2,904,085	0%	74%	26%
February 27, 2019	0	2,336,004	965,842	3,301,846	0%	71%	29%
February 28, 2019	0	1,940,312	702,939	2,643,251	0%	73%	27%
March 1, 2019	0	1,861,772	1,013,036	2,874,808	0%	65%	35%
March 2, 2019	0	1,856,536	370,272	2,226,808	0%	83%	17%
March 3, 2019	0	1,910,392	785,504	2,695,896	0%	71%	29%
March 4, 2019	0	1,997,908	600,871	2,598,779	0%	77%	23%
March 5, 2019	0	1,924,604	652,928	2,577,532	0%	75%	25%
March 6, 2019	0	1,787,720	643,502	2,431,222	0%	74%	26%
March 7, 2019	0	2,631,464	796,747	3,428,211	0%	77%	23%
March 8, 2019	0	2,483,360	483,769	2,967,129	0%	84%	16%
March 9, 2019	0	691,900	0	691,900	0%	100%	0%
March 10, 2019	0	-	0	0	0%	0%	0%
March 11, 2019	0	157,828	193,187	351,015	0%	45%	55%
March 12, 2019	0	1,252,152	709,388	1,961,540	0%	64%	36%
March 13, 2019	0	2,282,896	882,146	3,165,042	0%	72%	28%
March 14, 2019	0	1,917,872	924,570	2,842,442	0%	67%	33%
March 15, 2019	0	2,937,396	886,926	3,824,322	0%	77%	23%
March 16, 2019	0	2,954,600	450,878	3,405,478	0%	87%	13%
March 17, 2019	0	2,508,044	1,011,873	3,519,917	0%	71%	29%
March 18, 2019	0	2,139,280	973,175	3,112,455	0%	69%	31%
March 19, 2019	0	2,899,996	919,066	3,819,062	0%	76%	24%

March 20, 2019	0	2,373,404	982,620	3,356,024	0%	71%	29%
March 21, 2019	0	2,358,444	945,019	3,303,463	0%	71%	29%
March 22, 2019	0	1,733,864	1,042,396	2,776,260	0%	62%	38%
March 23, 2019	0	2,137,784	481,376	2,619,160	0%	82%	18%
March 24, 2019	0	1,375,572	576,000	1,951,572	0%	70%	30%
March 25, 2019	0	2,838,660	987,033	3,825,693	0%	74%	26%
March 26, 2019	0	1,905,156	899,974	2,805,130	0%	68%	32%
March 27, 2019	0	1,683,748	1,089,597	2,773,345	0%	61%	39%
March 28, 2019	0	2,210,340	858,059	3,068,399	0%	72%	28%
March 29, 2019	0	1,804,924	1,019,860	2,824,784	0%	64%	36%
March 30, 2019	0	2,157,232	1,118,175	3,275,407	0%	66%	34%
March 31, 2019	0	1,093,576	441,170	1,534,746	0%	71%	29%
April 1, 2019	0	2,154,988	936,385	3,091,373	0%	70%	30%
April 2, 2019	0	1,402,507	1,085,459	2,487,966	0%	56%	44%
April 3, 2019	0	2,606,025	722,167	3,328,192	0%	78%	22%
April 4, 2019	0	2,143,768	992,386	3,136,154	0%	68%	32%
April 5, 2019	0	1,032,988	374,444	1,407,432	0%	73%	27%
April 6, 2019	0	1,621,664	0	1,621,664	0%	100%	0%
April 7, 2019	0	1,271,615	0	1,271,615	0%	100%	0%
April 8, 2019	0	468,263	0	468,263	0%	100%	0%
April 9, 2019	0	15	0	15	0%	100%	0%
April 10, 2019	0	15	0	15	0%	100%	0%
April 11, 2019	0	15	0	15	0%	100%	0%
April 12, 2019	0	15	0	15	0%	100%	0%
April 13, 2019	0	15	0	15	0%	100%	0%
April 14, 2019	0	15	0	15	0%	100%	0%
April 15, 2019	0	15	0	15	0%	100%	0%
April 16, 2019	0	15	0	15	0%	100%	0%
April 17, 2019	0	15	0	15	0%	100%	0%
April 18, 2019	0	15	0	15	0%	100%	0%
April 19, 2019	0	15	0	15	0%	100%	0%
April 20, 2019	0	15	0	15	0%	100%	0%
April 21, 2019	0	15	0	15	0%	100%	0%
April 22, 2019	0	15	0	15	0%	100%	0%
April 23, 2019	0	691,661	415,381	1,107,041	0%	62%	38%
April 24, 2019	0	607,376	598,678	1,206,054	0%	50%	50%
April 25, 2019	0	918,544	403,876	1,322,420	0%	69%	31%
April 26, 2019	0	1,145,188	568,433	1,713,621	0%	67%	33%
April 27, 2019	0	1,476,552	467,306	1,943,858	0%	76%	24%
April 28, 2019	0	982,124	306,766	1,288,890	0%	76%	24%
April 29, 2019	0	1,279,080	369,082	1,648,162	0%	78%	22%
April 30, 2019	0	1,084,600	457,513	1,542,113	0%	70%	30%
May 1, 2019	0	1,453,364	872,126	2,325,490	0%	62%	38%
May 2, 2019	0	1,507,220	707,282	2,214,502	0%	68%	32%

May 3, 2019	0	1,619,420	625,236	2,244,656	0%	72%	28%
May 4, 2019	0	1,390,532	429,623	1,820,155	0%	76%	24%
May 5, 2019	0	1,095,820	412,789	1,508,609	0%	73%	27%
May 6, 2019	0	965,668	352,867	1,318,535	0%	73%	27%
May 7, 2019	0	951,456	374,829	1,326,285	0%	72%	28%
May 8, 2019	0	2,049,520	964,923	3,014,443	0%	68%	32%
May 9, 2019	0	1,329,944	396,038	1,725,982	0%	77%	23%
May 10, 2019	0	1,428,680	1,107,293	2,535,973	0%	56%	44%
May 11, 2019	0	1,979,956	529,591	2,509,547	0%	79%	21%
May 12, 2019	0	769,692	78,316	848,008	0%	91%	9%
May 13, 2019	0	825,792	454,299	1,280,091	0%	65%	35%
May 14, 2019	0	1,779,492	695,595	2,475,087	0%	72%	28%
May 15, 2019	0	1,081,608	399,959	1,481,567	0%	73%	27%
May 16, 2019	0	1,127,984	385,931	1,513,915	0%	75%	25%
May 17, 2019	0	985,116	49,280	1,034,396	0%	95%	5%
May 18, 2019	0	492,932	0	492,932	0%	100%	0%
May 19, 2019	0	694,892	0	694,892	0%	100%	0%
May 20, 2019	0	412,896	0	412,896	0%	100%	0%
May 21, 2019	0	623,084	0	623,084	0%	100%	0%
May 22, 2019	0	623,832	167,540	791,372	0%	79%	21%
May 23, 2019	0	573,716	137,263	710,979	0%	81%	19%
May 24, 2019	0	389,708	451,597	841,305	0%	46%	54%
May 25, 2019	0	1,106,292	167,792	1,274,084	0%	87%	13%
May 26, 2019	0	329,120	237,811	566,931	0%	58%	42%
May 27, 2019	0	231,880	56,996	288,876	0%	80%	20%
May 28, 2019	0	1,323,212	157,969	1,481,181	0%	89%	11%
May 29, 2019	0	350,812	178,119	528,931	0%	66%	34%
May 30, 2019	0	403,172	169,384	572,556	0%	70%	30%
May 31, 2019	0	521,356	168,780	690,136	0%	76%	24%
June 1, 2019	0	550,528	426,740	977,268	0%	56%	44%
June 2, 2019	0	1,179,596	439,370	1,618,966	0%	73%	27%
June 3, 2019	0	1,146,684	452,334	1,599,018	0%	72%	28%
June 4, 2019	0	1,212,508	550,039	1,762,547	0%	69%	31%
June 5, 2019	0	2,015,112	973,756	2,988,868	0%	67%	33%
June 6, 2019	0	1,384,548	532,719	1,917,267	0%	72%	28%
June 7, 2019	0	882,640	461,571	1,344,211	0%	66%	34%
June 8, 2019	0	1,169,872	569,045	1,738,917	0%	67%	33%
June 9, 2019	0	1,923,108	910,143	2,833,251	0%	68%	32%
June 10, 2019	0	2,030,072	1,030,075	3,060,147	0%	66%	34%
June 11, 2019	0	2,403,324	1,501,270	3,904,594	0%	62%	38%
June 12, 2019	0	3,600,124	1,338,384	4,938,508	0%	73%	27%
June 13, 2019	0	2,665,872	716,000	3,381,872	0%	79%	21%
June 14, 2019	0	1,359,116	399,936	1,759,052	0%	77%	23%
June 15, 2019	0	1,081,608	439,195	1,520,803	0%	71%	29%

June 16, 2019	0	1,166,880	403,756	1,570,636	0%	74%	26%
June 17, 2019	0	1,264,868	441,674	1,706,542	0%	74%	26%
June 18, 2019	0	1,309,000	473,700	1,782,700	0%	73%	27%
June 19, 2019	0	1,420,452	369,933	1,790,385	0%	79%	21%
June 20, 2019	0	1,266,364	16,119	1,282,483	0%	99%	1%
June 21, 2019	0	790,636	135,418	926,054	0%	85%	15%
June 22, 2019	0	534,072	479,356	1,013,428	0%	53%	47%
June 23, 2019	0	1,224,476	247,621	1,472,097	0%	83%	17%
June 24, 2019	0	1,442,144	475,326	1,917,470	0%	75%	25%
June 25, 2019	0	1,410,728	398,176	1,808,904	0%	78%	22%
June 26, 2019	0	1,264,868	24,912	1,289,780	0%	98%	2%
June 27, 2019	0	699,380	0	699,380	0%	100%	0%
June 28, 2019	0	707,608	152,008	859,616	0%	82%	18%
June 29, 2019	0	735,284	445,526	1,180,810	0%	62%	38%
June 30, 2019	0	1,450,372	0	1,450,372	0%	100%	0%

<b>Totals</b>	0	644,943,552	237,737,480	882,681,032	0%	73%	27%
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