

DOCKETED

Docket Number:	00-AFC-01C
Project Title:	Contra Costa Power Plant Project Compliance
TN #:	237336
Document Title:	Annual Compliance Report RY 2020 for GGS_2of8 parts
Description:	Annual Compliance Report No. 12 for PG&E Gateway Generating Station (00-AFC-01C) for RY 2020
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Submitter Role:	Applicant Representative
Submission Date:	3/29/2021 10:58:06 AM
Docketed Date:	3/29/2021

Gateway Generating Station
(00-AFC-1C)

Annual Compliance Report No. 12

Exhibit 1
Updated Compliance Matrix

PG&E Gateway Generating Station Project
California Energy Commission Compliance Matrix
December 31, 2020

Color Code Legend

Construction Phase Condition	Commissioning Phase Condition	Operations Phase Condition	Submitted	Submitted / Approved / Completed
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CEC Cond. No.	Project Phase	Summary of Condition	Submittal Required	Due Date to CEC	Date Submitted/ Completed	Submittal Approved by CEC	Status	Comments
AQ-13	3_OPS	CTs and HRSGs shall be fired on gas with a maximum sulfur content of no greater than 1 grain per 100 standard cubic feet.	Conduct monthly sulfur analysis and incorporate results into QAQR.	Quarterly after COD (Recurring)	Q1: 4/17/2020, Q2: 7/20/2020, Q3:10/23/2020, Q4: 1/27/2021		Submitted w/ Quarterly Air Compliance Reports (QAQR)	
AQ-14	3_OPS	Combined heat input rate to each power train shall not exceed 2,227 MM BTU per hour over any rolling 3 hour period.	Demonstrate compliance in Quarterly Air Quality Reports (QAQR) due January 30, April 30, July 30, and October 30	Quarterly after COD (Recurring)	Q1: 4/17/2020, Q2: 7/20/2020, Q3:10/23/2020, Q4: 1/27/2021		Submitted w/ Quarterly Air Compliance Reports (QAQR)	
AQ-15	3_OPS	Combined heat input rate to each power train shall not exceed 49,950 MM BTU per calendar day.	Demonstrate compliance in QAQR due January 30, April 30, July 30, and October 30	Quarterly after COD (Recurring)	Q1: 4/17/2020, Q2: 7/20/2020, Q3:10/23/2020, Q4: 1/27/2021		Submitted w/ Quarterly Air Compliance Reports (QAQR)	
AQ-16	3_OPS	Combined cumulative heat input rate for the CTs and HRSG shall not exceed 34,900,000 MM BTU per year.	Demonstrate compliance in Quarterly Air Quality Reports (QAQR) due January 30, April 30, July 30, and October 30	Quarterly after COD (Recurring)	Q1: 4/17/2020, Q2: 7/20/2020, Q3:10/23/2020, Q4: 1/27/2021		Submitted w/ Quarterly Air Compliance Reports (QAQR)	
AQ-17	3_OPS	HRSG duct burners shall not be fired without CT in operation.	Include info on date, time, an duration of any violation in Quarterly Air Quality Reports (due January 30, April 30, July 30, and October 30)	Quarterly after COD (Recurring)	Q1: 4/17/2020, Q2: 7/20/2020, Q3:10/23/2020, Q4: 1/27/2021		Submitted w/ Quarterly Air Compliance Reports (QAQR)	
AQ-18	3_OPS	CT 1 and HRSG 1 shall be abated by SCR whenever fuel is combusted at those sources and catalyst bed has reached minimum operating temp. (BACT for NOx)	Provide information on any major problem in operation of OxCat and SCR (include date, description, and steps taken to resolve) in QAQR reports due January 30, April 30, July 30, and Oct. 30 each year)	Quarterly after COD (Recurring)	Q1: 4/17/2020, Q2: 7/20/2020, Q3:10/23/2020, Q4: 1/27/2021		Submitted w/ Quarterly Air Compliance Reports (QAQR)	
AQ-19	3_OPS	CT 2 and HRSG 2 shall be abated by SCR whenever fuel is combusted at those sources and catalyst bed has reached minimum operating temp. (BACT for NOx)	Provide information on any major problem in operation of OxCat and SCR (include date, description, and steps taken to resolve) in QAQR reports due January 30, April 30, July 30, and Oct. 30 each year)	Quarterly after COD (Recurring)	Q1: 4/17/2020, Q2: 7/20/2020, Q3:10/23/2020, Q4: 1/27/2021		Submitted w/ Quarterly Air Compliance Reports (QAQR)	
AQ-20	3_OPS	CTs and HRSGs to comply with requirements as listed in the Condition under all operating scenarios, including duct burner firing mode and steam injection power aug mode. Requirements do not apply to CT start-up or shut down. (BACT, PSD...)	Provide info listed in Verification language of condition and include in QAQR reports due January 30, April 30, July 30, and Oct. 30 each year)	Quarterly after COD (Recurring)	Q1: 4/17/2020, Q2: 7/20/2020, Q3:10/23/2020, Q4: 1/27/2021		Submitted w/ Quarterly Air Compliance Reports (QAQR)	
AQ-21	3_OPS	Regulated air pollutant mass emission rates shall not exceed limits shown in the Condition. (PSD)	Provide info listed in Condition 20 Verification language of condition and include in QAQR reports due January 30, April 30, July 30, and Oct. 30 each year)	Quarterly after COD (Recurring)	Q1: 4/17/2020, Q2: 7/20/2020, Q3:10/23/2020, Q4: 1/27/2021		Submitted w/ Quarterly Air Compliance Reports (QAQR)	
AQ-22	3_OPS	CTs shall not run in startup mode simultaneously (PSD).	Provide info listed in Condition 20 Verification language of condition and include in QAQR reports due January 30, April 30, July 30, and Oct. 30 each year)	Quarterly after COD (Recurring)	Q1: 4/17/2020, Q2: 7/20/2020, Q3:10/23/2020, Q4: 1/27/2021		Submitted w/ Quarterly Air Compliance Reports (QAQR)	
AQ-23	3_OPS	Total combined emissions from CTs and HRSG shall not exceed limits specified in Condition during any calendar day.	Provide info listed in Condition 20 Verification language of condition and include in QAQR reports due January 30, April 30, July 30, and Oct. 30 (of each year)	Quarterly after COD (Recurring)	Q1: 4/17/2020, Q2: 7/20/2020, Q3:10/23/2020, Q4: 1/27/2021		Submitted w/ Quarterly Air Compliance Reports (QAQR)	

PG&E Gateway Generating Station Project
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CEC Cond. No.	Project Phase	Summary of Condition	Submittal Required	Due Date to CEC	Date Submitted/ Completed	Submittal Approved by CEC	Status	Comments
AQ-24	3_OPS	Cumulative combined emissions shall not exceed limits specified in Condition during any consecutive 12 month period.	Provide info listed in Condition 20 Verification language of condition and include in QAQR reports due January 30, April 30, July 30, and Oct. 30 each year)	Quarterly after COD (Recurring)	Q1: 4/17/2020, Q2: 7/20/2020, Q3:10/23/2020, Q4: 1/27/2021		Submitted w/ Quarterly Air Compliance Reports (QACR)	
AQ-25	3_OPS	Maximum projected annual toxic air contaminant emissions from CTs and HRSGs shall not exceed limits specified in Condition .	Owner shall perform a health risk assessment using emission rates determined by source test and most current BAAQMD approved procedures and unit risk factors in effect at the time of the analysis.	Within 60 days of source test date	Q1: 4/17/2020, Q2: 7/20/2020, Q3:10/23/2020, Q4: 1/27/2021		Submitted w/ Quarterly Air Compliance Reports (QACR)	
AQ-26	3_OPS	Demonstrate compliance with Conditions AQ-14 through 17, 20(a) through 20 (d), 21, 23 (a), 24(a), and 24(b) with CEMs during all hours of operation including equipment startup and shutdowns for all parameters listed in Condition .	Detailed plan on how the measurements and recordings will be performed. CEMS Monitoring Plan	At least 60 days prior to initial operation	8/21/2008		Submitted to CEC & BAAQMD	Record keeping to demonstrate compliance is on-going.
AQ-27	3_OPS	Calculate and record daily the POC, PM10, and SO2 from each power train using actual heat input rates calculated per AQ-26, actual CT startup and shutdown times, and CEC/BAAQMD approved emission factors to calculate emissions. (See additional reporting requirements listed in Condition.)	Provide info listed in Condition 20 Verification language of condition and include in QAQR reports due January 30, April 30, July 30, and Oct. 30 each year)	Quarterly after COD (Recurring)	Q1: 4/17/2020, Q2: 7/20/2020, Q3:10/23/2020, Q4: 1/27/2021		Submitted w/ Quarterly Air Compliance Reports (QACR)	
AQ-28	3_OPS	Calculate and record on an annual basis the maximum projected emissions of formaldehyde, benzene, and specified PAHs.	Provide info listed in Condition 20 Verification language of condition and include in QAQR reports due January 30, April 30, July 30, and Oct. 30 each year)	Quarterly after COD (Recurring)	Q1: 4/17/2020, Q2: 7/20/2020, Q3:10/23/2020, Q4: 1/27/2021		Submitted w/ Quarterly Air Compliance Reports (QACR)	
AQ-30	3_OPS	Conduct District approved source test on exhaust points while CTs and HRSGs are operating at max. load and min. load to demonstrate compliance with AQ-20, and to verify accuracy of CEMS (per Condition AQ-26).	Submit Source Test Protocols /Conduct Source Test 60 days of initial operation and annually thereafter	Within 60 days of first fire, & annually thereafter	Notification: 12/15/2020 (for 2021 ST/RATA), Test (01/11/2021 to 01/15/2021)			
AQ-31a	3_OPS	Obtain approval for all source test procedures from BAAQMD Source Test Section and CPM prior to conducting tests.	Notify BAAQMD Source Test Section and CEC CPM in writing of source test protocols and projected test dates .	At least 7 days prior to source test dates	Notification: 12/15/2020 (for 2021 ST/RATA), Test (01/11/2021 to 01/15/2021)			
AQ-31b	3_OPS	Submit source test results to the District & CEC CPM.	Submit source test results to BAAQMD and CEC CPM.	Within 60 days of conducting source tests	3/11/2021			
AQ-32a	3_OPS	Conduct source test on exhaust point P-11 or P-12 while CT and HRSGs are operating at maximum allowable operating rates to demonstrate compliance with AQ-25 (see Condition for more details) .	Notify BAAQMD Source Test Section and CEC CPM in writing of source test protocols and projected test dates. Conduct Source test 60 days of initial operation and biennial thereafter	At least 7 days prior to source test dates	Notification: 12/15/2020 (for 2021 ST/RATA), Test (01/11/2021 to 01/15/2021)			

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AQ-32b	3_OPS	Submit source test results to the District & CEC CPM.	Submit source test results to BAAQMD and CEC CPM.	Within 60 days of conducting source tests	3/11/2021			
AQ-33	3_OPS	Submit all reports (monitor breakdowns, CEMS, emission access reports, equipment breakdowns) as required by District Rules or Regulations	Provide info listed in Condition 20 Verification language of condition and include in QAQR reports due January 30, April 30, July 30, and Oct. 30 each year)	Quarterly after COD (Recurring)	Q1: 4/17/2020, Q2: 7/20/2020, Q3:10/23/2020, Q4: 1/27/2021		Submitted w/ Quarterly Air Compliance Reports (QACR)	
AQ-34	3_OPS	Maintain ongoing records and reports on site for a minimum of 5 years (to include but not limited to: CEMS records (firing hours, fuel flows, emission rates, monitor excesses, breakdowns, etc.). Source and analytical records, natural gas sulfur content analysis results, emission calculation record, plant upsets and related incidents.)	Make records available to BAAQMD, ARB, EPA, and CEC.	Ongoing	N/A		On-going (Records are maintained)	
AQ-35	3_OPS	Notify District and CPM of violation of any permit conditions in accordance with applicable BAAQMD rules and regulations.	Submit written notification to Enforcement Division within 96 hours of the violation.	Quarterly after COD (Recurring)	Q1: 4/17/2020, Q2: 7/20/2020, Q3:10/23/2020, Q4: 1/27/2021		Submitted w/ Quarterly Air Compliance Reports (QACR)	event occurred on 10/19/16
AQ-44	3_OPS	Take monthly gas samples.		Quarterly after COD (Recurring)	Q1: 4/17/2020, Q2: 7/20/2020, Q3:10/23/2020, Q4: 1/27/2021		Submitted w/ Quarterly Air Compliance Reports (QACR)	
AQ-45b	3_OPS	WSAC shall be properly installed/maintained to minimize drift losses	Sample the water once in July, August and September each year while WSAC is in operation and submit results in QACR.	Quarterly after COD (Recurring)	Q1: 4/17/2020, Q2: 7/20/2020, Q3:10/23/2020, Q4: 1/27/2021		Submitted w/ Quarterly Air Compliance Reports (QACR)	
AQ-46b	3_OPS	Have WSAC field rep inspect drift eliminators and certify installation was performed satisfactorily. Verify that PM10 emissions do not exceed 4.7 lbs/day based on most recent TDS (see formula in condition).	Report calculated PM10 emissions from WSAC in QACR.	Quarterly after COD (Recurring)	Q1: 4/17/2020, Q2: 7/20/2020, Q3:10/23/2020, Q4: 1/27/2021		Submitted w/ Quarterly Air Compliance Reports (QACR)	
AQ-47	3_OPS	Fuel gas preheater shall not be operated more than 16 hours in any day.	Submit verification of hours of operation as part of QACR.	Quarterly after COD (Recurring)	Q1: 4/17/2020, Q2: 7/20/2020, Q3:10/23/2020, Q4: 1/27/2021		Submitted w/ Quarterly Air Compliance Reports (QACR)	
AM-1	3_OPS	Conduct Source Test to determine ammonia emission concentration	Submit the results of Source Test with in 60 days of completion	Annually (recurring)	3/11/2021			
BIO-02	3_OPS	Designated Biologist to submit record summaries in the Annual Compliance Report	Provide statement in the Annual Compliance Report whether any actions that affected biological resources occurred on site for the reporting year.	Annually in ACR	3/24/2020		Submitted with this Annual Compliance Report (ACR)	

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BIO-09	3_OPS	Incorporate a Biological Resource Element that includes biological resource facility closure measures into the facility closure plan and BRMIMP.	at least 12 months prior to commencement of permanent closure activities.	at least 12 months prior to facility closure or earlier if needed				Not needed yet
GEN	3_OPS	Annual Compliance Report (ACR)	Submit Annual Compliance Report (ACR): March 31st of the following calendar year	Annually (recurring)	3/24/2020		Submitted w/ this report	
GEN-09	3_OPS	Submit closure/decommissioning plan	Submit closure/decommissioning plan. Meet with CPM prior to submittal.	12 months prior to closing				Not needed yet
HAZ-01	3_OPS	Do not use any hazardous material not listed in Appendix C of the Final Decision.	Provide list of all hazardous materials used at site in the Annual Compliance Report	Annually in ACR	3/24/2020		Submitted w/ this report (see Exhibit 5)	
PAL-07	3_OPS	Include in facility closure plan a description regarding facility closure activity's potential to impact paleontological resources.	Include description of closure activities.	12 months prior to closure of the facility.				Not needed yet
SOILS & WATER-03	3_OPS	Keep the CPM informed of any modification to the permit, Stormwater Industrial General Permit (IGP).	Submit to CPM: any modification of IGP, submit copy of correspondence with the County on MS4 permit and CVRWQCB, maintain in SWPPP a copy of NOI.	during operation	3/24/2020		Submitted w/ this report	NOI and revised SWPPP was submitted to Waterboard through SMARTS copied on this report
SOILS & WATER-4	3_OPS	During operation, any monitoring reports provided to DD shall be provided to the CPM. The CPM shall be notified of any violations of discharge limits/amounts	Submit any water quality monitoring required by DD to the CPM in annual compliance report. Submit any NOV from DD to the CPM within 10 days of receipt explaining corrective actions taken.	Annually	3/24/2020		Submitted w/ this report	
SOILS & WATER-10b	3_OPS	Submit a water use summary to the CPM in the annual compliance report. Also report on the servicing, testing, and calibration of the meters in the ACR.	Provide information in annual compliance report.	Annually in ACR	3/24/2020		Submitted with ACR: Water use for RY 2016 = 63.6 AF	

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TLSN-03	3_OPS	Identify and correct complaints of interference with radio or television communications from operation of transmission line. Maintain record of complaints for first five year of operation	Submit reports of line-related interferences and action taken to CPM for the first five year of operation.	Annually in ACR (for 2009-2013)	No longer required starting in RY 2014			
VIS-04c	3_OPS	Install aesthetic screening (trees) along south, east, and north boundaries	Verify in the annual compliance report that maintenance has been performed	Annually in ACR	3/24/2020		Submitted with ACR: appropriate maintenance was performed in RY 2016	

Key Dates:

First Fire	11/1/2008	(CT-A = 11/01/08, CT-B = 11/04/08)
Perf. Tests (Target)	12/6/2008	
Source Test (Started)	1/4/2009	Unit A:1/4/2009, Unit B: 01/06/2009
Source Test (Completed)	1/14/2009	For Both Units
COD (Target)	2/5/2009	
COD (Actual)	1/4/2009	
COD (Guaranteed)	2/28/2009	
Aq. Ammonia on Site	12/4/2008	
Steam Blow	11/4/2008	
Install Catalyst (SCR/CO)	11/24/2008	(SCR Catalyst = 11/24/08)
Q4 2009 Report	1/30/2010	
Sulfuric Acid on Site	3/1/2009	Planned: March 2009
First Lube	7/14/2008	
Noise Survey(Completed)	1/21/2009	Both Community and in-plant surveys
Sustained output	1/4/2009	
Connection Potable Water	3/17/2008	
Pre-energy E/MF	5/19/2008	
Post-energy E/MF	5/9/2009	(W/in 6 mos of start of operation = first synchronization to grid)
First Synchronization	11/10/2008	(First Synchronization to grid: CT-A : 11/11/08, CT-B : 11/10/08)
Start of operation	1/4/2009	
Annual Compliance Report	3/24/2020	RY 2019 ACR