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January 30, 2024

**NOTICE OF INTENT TO FILE
2023 Q4 Compliance Report for the
Malburg Generating Station (01-AFC-25C)**

Dear Dr. Ali:

Attached please find the Quarterly Compliance Report for the Malburg Generating Station (01-AFC-25C), covering the operational period of October 1, 2023, through December 31, 2023. This report addresses all quarterly requirements identified in the Final Commission Decision for the Malburg Generating Station (TN #28746), as most recently amended on June 20, 2019 by the Errata to Staff Analysis of Petition to Amend the Final Commission Decision (TN #228444).

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

Thank you,

Todd Dusenberry
General Manager of Vernon Public Utilities

Copies: Lisa Umeda
Matt Richards

Enclosure: MGS 2023 Q4 Compliance Report

Malburg Generating Station Quarterly Compliance Report (Fourth Quarter 2023)

Submitted to
California Energy Commission

Submitted by
City of Vernon, Public Utilities Department

January 30, 2024

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Acronyms and Abbreviations

CEC	California Energy Commission
CEMS	continuous emissions monitoring system
CO	carbon monoxide
COC	Conditions of Certification
CTGs	combustion turbine generators
DAHS	data acquisition and handling system
gr/scf	grain per standard cubic foot
HRSGs	heat recovery steam generators
lb/day	pounds per day
lb/hr	pounds per hour
MGS	Malburg Generating Station
NH ₃	ammonia
NO _x	nitrogen oxides
PM ₁₀	particulate matter with aerodynamic diameter less than or equal to 10 microns
PM _{2.5}	particulate matter with aerodynamic diameter less than or equal to 2.5 microns
ppm	parts per million
ppmv	parts per million by volume
ppmw	parts per million by weight
QCR	Quarterly Compliance Report
RECLAIM	Regional Clean Air Incentives Market
SCAQMD	South Coast Air Quality Management District
SO _x	sulfur oxides
STG	steam turbine generator
TDS	total dissolved solids
VOC	volatile organic compound

1. Introduction

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

1.1 Project Location and Description

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

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

1.2 Organization of the Quarterly Compliance Report

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

2. Required Quarterly Compliance Report Documentation

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

Table 2-1. Required Quarterly Compliance Report Documentation

Condition of Certification	Response
AQ-C6	The weekly total dissolved solids (TDS) results for the fourth quarter of 2023 are provided in Appendix A, Table 2; the weekly sample reports collected for the same period are provided in Appendix B.
AQ-C7	Daily particulate matter with aerodynamic diameter less than or equal to 10 microns (PM10) emissions from cooling tower operation during the fourth quarter of 2023 are provided in Appendix A, Tables 3 through 5. As shown, emissions were below the specified limit of 6.2 pounds per day (lb/day).
AQ-C8	Testing times for the diesel-fired emergency firewater pump during the fourth quarter of 2023 are provided in Appendix C, Table 2. MGS refrained from testing the diesel-fired emergency firewater pump in the same hour the CTGs were either started or shutdown.
AQ-C9	The CTG startup and shutdown details for the fourth quarter of 2023, including the duration and date of occurrence, are provided in Appendix C, Table 1.
AQ-C11	All ammonia (NH3), nitrogen oxides (NOx), sulfur oxides (SOx), carbon monoxide (CO), PM10, and volatile organic compound (VOC) emissions from MGS operation during the fourth quarter of 2023 are provided in Appendix A, Table 1B. Annual emissions of these same pollutants are provided in Appendix A, Table 1A.
AQ-2	Low sulfur diesel fuel was last purchased on July 28, 2023. The fuel purchase record is provided in Appendix D and demonstrates that the fuel does not contain sulfur compounds in excess of 15 parts per million by weight (ppmw).
AQ-3	See the response for COC AQ-2.

Malburg Generating Station Quarterly Compliance Report (Fourth Quarter 2023)

Condition of Certification	Response
AQ-5	Monthly emissions of CO, PM10, particulate matter with an aerodynamic diameter less than or equal to 2.5 microns (PM2.5), VOC, and SOx from CTG and duct burner operation during the fourth quarter of 2023 are presented in Appendix A, Tables 7 through 9. Fuel usage for each turbine-duct burner pair is provided in Appendix A, Table 6. As shown, emissions were below the monthly limits specified in Condition A63.4 of the site's Title V Permit.
AQ-6	See the response for COC AQ-C9.
AQ-9	See the response for COC AQ-C11. Additionally, quarterly NOx excess emission reports from the data acquisition and handling system (DAHS) are provided in Appendix E. As demonstrated in these reports, there were no incidents in which the maximum corrected NOx emissions concentration for either CTG exceeded the emission concentration limit of 2.0 parts per million by volume (ppmv). All continuous emissions monitoring system (CEMS) data for MGS' CTGs are stored electronically onsite.
AQ-10	See the response for COC AQ-C11. Additionally, quarterly CO excess emission reports from the DAHS are provided in Appendix E. As demonstrated in these reports, there were no incidents in which the maximum corrected CO emissions concentration for either CTG exceeded the emission concentration limit of 2.0 ppmv. All CEMS data for MGS' CTGs are stored electronically onsite.
AQ-11	See the response for COC AQ-C11. Additionally, quarterly VOC excess emission reports from the DAHS are provided in Appendix E. As demonstrated in these reports, there were no incidents in which the maximum corrected VOC emissions concentration for either CTG exceeded the emission concentration limit of 2.0 ppmv. All CEMS data for MGS' CTGs are stored electronically onsite.
AQ-12	See the response for COC AQ-C11. Additionally, compliance with the specified limit of 5 parts per million (ppm) is primarily demonstrated through annual or quarterly source testing. The most recent NH3 compliance source test for CTG 1 was performed on November 17, 2023, with results submitted to the CEC on November 28, 2023, and indicated compliance with the emission limit (0.5 ppm). The most recent NH3 compliance source test for CTG 2 was performed on May 16, 2023, with results submitted to the CEC on June 23, 2023, and also indicated compliance with the emission limit (0.6 ppm). NH3 emissions are also calculated via the CEMS on an hourly basis and confirmed to comply with the NH3 concentration limit of 5 ppm.
AQ-13	See the response for COC AQ-C11. Additionally, the most recent triennial compliance source test, performed in July 2022, indicated compliance with the Rule 475 particulate matter emission limits of 5 kilograms per hour (11 pounds per hour [lb/hr]) or 23 milligrams per cubic meter (0.01 grain per standard cubic foot [gr/scf]) for both CTGs (0.67 lb/hr and 0.0003 gr/scf for CTG 1 and 1.83 lb/hr and 0.0007 gr/scf for CTG 2).
AQ-14	See the response for COC AQ-2.
AQ-15	Year-to-date hours of operation for the diesel-fired emergency firewater pump are provided in Appendix A, Table 10. As shown, the year-to-date 2023 hours for maintenance and testing did not exceed 50 hours and the total operational hours did not exceed 200 hours.
AQ-27	See the response for COC AQ-5. As shown, fuel consumption per turbine-duct burner pair did not exceed the specified limit of 405 million cubic feet per month.
AQ-32	The NOx Regional Clean Air Incentives Market (RECLAIM) annual emission allocation information for the MGS facility, received from the South Coast Air Quality Management District (SCAQMD) for compliance year 2023 – 2024, is provided in Appendix F.
AQ-36	See the responses for COCs AQ-5 and AQ-6.

Appendix A

MGS Emission Calculations



Malburg Generating Station
Quarterly Compliance Report
Appendix A, Table 1

Reporting Period: **Quarter 4 2023**

Table 1A. Annual Emissions - Calendar Year 2023

Source	Annual Emissions (lb/year)					
	NOx	CO	VOC	SOx	PM ₁₀ /PM _{2.5}	NH ₃
CTG 1 & Duct Burner	9,475	3,656	1,954	354	7,639	11,646
CTG 2 & Duct Burner	10,134	3,646	2,148	388	8,390	12,798
Cooling Tower	--	--	--	--	595	--
Diesel Firewater Pump	139	4.0	1.0	0.1	0.9	0.24
Total	19,748	7,306	4,102	742	16,624	24,444

Table 1B. Quarterly Emissions - October 1, 2023 through December 31, 2023

Source	Quarterly Emissions (lb/quarter)					
	NOx	CO	VOC	SOx	PM ₁₀ /PM _{2.5}	NH ₃
CTG 1 & Duct Burner	1,357	607	283	51	1,105	1,679
CTG 2 & Duct Burner	2,193	859	464	84	1,815	2,759
Cooling Tower	--	--	--	--	96	--
Diesel Firewater Pump	33.6	1.0	0.2	0.0	0.2	0.1
Total	3,584	1,466	747	136	3,016	4,438

Malburg Generating Station
Quarterly Compliance Report
Appendix A, Table 2

Reporting Period: **Quarter 4 2023**

Table 2. Cooling Tower Total Dissolved Solids (TDS) Sampling Results ^{1, 2}

Sampling Period		TDS (ppm)
Start Date	End Date	
10/1/2023	10/7/2023	4,520
10/8/2023	10/14/2023	4,180
10/15/2023	10/21/2023	5,390
10/22/2023	10/28/2023	5,030
10/29/2023	11/4/2023	4,980
11/5/2023	11/11/2023	4,080
11/12/2023	11/18/2023	4,420
11/19/2023	11/25/2023	4,290
11/26/2023	12/2/2023	4,940
12/3/2023	12/9/2023	--
12/10/2023	12/16/2023	--
12/17/2023	12/23/2023	--
12/24/2023	12/30/2023	--
12/31/2023	1/6/2024	--

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

² The plant was primarily offline during December 2023; therefore, cooling tower TDS samples were not collected during this time.

**Malburg Generating Station
Quarterly Compliance Report
Appendix A, Table 3**

Reporting Period: **October 2023**

Cooling Tower Total Dissolved Solids (TDS) Sampling Results

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

Sample Date	Period		TDS (ppm)
	Start Date	End Date	
10/3/2023	10/1/2023	10/7/2023	4,520
10/9/2023	10/8/2023	10/14/2023	4,180
10/17/2023	10/15/2023	10/21/2023	5,390
10/23/2023	10/22/2023	10/28/2023	5,030
10/30/2023	10/29/2023	11/4/2023	4,980

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

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

Constants

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

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

² Per COC AQ-C4.

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

Cooling Tower Daily PM₁₀ Emissions

Date	Circulation Rate (gal/day) ¹	TDS (ppm)	PM ₁₀ Emissions (lb/day)	Above 6.2 lb/day PM ₁₀ Limit? ²
10/1/2023	38,880,000	4,520	1.46	No
10/2/2023	38,880,000	4,520	1.46	No
10/3/2023	38,880,000	4,520	1.46	No
10/4/2023	38,880,000	4,520	1.46	No
10/5/2023	38,880,000	4,520	1.46	No
10/6/2023	38,880,000	4,520	1.46	No
10/7/2023	38,880,000	4,520	1.46	No
10/8/2023	38,880,000	4,180	1.35	No
10/9/2023	38,880,000	4,180	1.35	No
10/10/2023	38,880,000	4,180	1.35	No
10/11/2023	38,880,000	4,180	1.35	No
10/12/2023	38,880,000	4,180	1.35	No
10/13/2023	38,880,000	4,180	1.35	No
10/14/2023	38,880,000	4,180	1.35	No
10/15/2023	38,880,000	5,390	1.75	No
10/16/2023	38,880,000	5,390	1.75	No
10/17/2023	38,880,000	5,390	1.75	No
10/18/2023	38,880,000	5,390	1.75	No
10/19/2023	38,880,000	5,390	1.75	No
10/20/2023	38,880,000	5,390	1.75	No
10/21/2023	38,880,000	5,390	1.75	No
10/22/2023	38,880,000	5,030	1.63	No
10/23/2023	38,880,000	5,030	1.63	No
10/24/2023	38,880,000	5,030	1.63	No
10/25/2023	38,880,000	5,030	1.63	No
10/26/2023	38,880,000	5,030	1.63	No
10/27/2023	38,880,000	5,030	1.63	No
10/28/2023	38,880,000	5,030	1.63	No
10/29/2023	38,880,000	4,980	1.61	No
10/30/2023	38,880,000	4,980	1.61	No
10/31/2023	38,880,000	4,980	1.61	No

¹ Maximum daily circulation rate conservatively used to estimate PM₁₀ emissions when the cooling tower is operated for any part of the day. Circulation rate is zero for days the cooling tower is not operated at all.

² Daily emissions limit established in COC AQ-C7.

**Malburg Generating Station
Quarterly Compliance Report
Appendix A, Table 4**

Reporting Period: **November 2023**

Cooling Tower Total Dissolved Solids (TDS) Sampling Results

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

Sample Date	Period		TDS (ppm)
	Start Date	End Date	
10/30/2023	10/29/2023	11/4/2023	4,980
11/7/2023	11/5/2023	11/11/2023	4,080
11/13/2023	11/12/2023	11/18/2023	4,420
11/21/2023	11/19/2023	11/25/2023	4,290
11/28/2023	11/26/2023	12/2/2023	4,940

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

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

Constants

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

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

² Per COC AQ-C4.

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

Cooling Tower Daily PM₁₀ Emissions

Date	Circulation Rate (gal/day) ¹	TDS (ppm)	PM ₁₀ Emissions (lb/day)	Above 6.2 lb/day PM ₁₀ Limit? ²
11/1/2023	38,880,000	4,980	1.61	No
11/2/2023	38,880,000	4,980	1.61	No
11/3/2023	38,880,000	4,980	1.61	No
11/4/2023	38,880,000	4,980	1.61	No
11/5/2023	38,880,000	4,080	1.32	No
11/6/2023	38,880,000	4,080	1.32	No
11/7/2023	38,880,000	4,080	1.32	No
11/8/2023	38,880,000	4,080	1.32	No
11/9/2023	38,880,000	4,080	1.32	No
11/10/2023	38,880,000	4,080	1.32	No
11/11/2023	38,880,000	4,080	1.32	No
11/12/2023	38,880,000	4,420	1.43	No
11/13/2023	38,880,000	4,420	1.43	No
11/14/2023	38,880,000	4,420	1.43	No
11/15/2023	38,880,000	4,420	1.43	No
11/16/2023	38,880,000	4,420	1.43	No
11/17/2023	38,880,000	4,420	1.43	No
11/18/2023	38,880,000	4,420	1.43	No
11/19/2023	38,880,000	4,290	1.39	No
11/20/2023	38,880,000	4,290	1.39	No
11/21/2023	38,880,000	4,290	1.39	No
11/22/2023	38,880,000	4,290	1.39	No
11/23/2023	38,880,000	4,290	1.39	No
11/24/2023	38,880,000	4,290	1.39	No
11/25/2023	38,880,000	4,290	1.39	No
11/26/2023	38,880,000	4,940	1.60	No
11/27/2023	38,880,000	4,940	1.60	No
11/28/2023	38,880,000	4,940	1.60	No
11/29/2023	38,880,000	4,940	1.60	No
11/30/2023	38,880,000	4,940	1.60	No

¹ Maximum daily circulation rate conservatively used to estimate PM₁₀ emissions when the cooling tower is operated for any part of the day. Circulation rate is zero for days the cooling tower is not operated at all.

² Daily emissions limit established in COC AQ-C7.

**Malburg Generating Station
Quarterly Compliance Report
Appendix A, Table 5**

Reporting Period: December 2023

Cooling Tower Total Dissolved Solids (TDS) Sampling Results

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

Sample Date ¹	Period		TDS (ppm)
	Start Date	End Date	
11/28/2023	11/26/2023	12/2/2023	4,940
--	12/3/2023	12/9/2023	--
--	12/10/2023	12/16/2023	--
--	12/17/2023	12/23/2023	--
--	12/24/2023	12/30/2023	--

¹ The plant was primarily offline during December 2023; therefore, no cooling tower sample was collected during this time.

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

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

Constants

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

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

² Per COC AQ-C4.

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

Cooling Tower Daily PM₁₀ Emissions

Date	Circulation Rate (gal/day) ¹	TDS (ppm) ²	PM ₁₀ Emissions (lb/day)	Above 6.2 lb/day PM ₁₀ Limit? ³
12/1/2023	0	4,940	0.00	No
12/2/2023	0	4,940	0.00	No
12/3/2023	0	--	0.00	No
12/4/2023	0	--	0.00	No
12/5/2023	0	--	0.00	No
12/6/2023	0	--	0.00	No
12/7/2023	0	--	0.00	No
12/8/2023	0	--	0.00	No
12/9/2023	0	--	0.00	No
12/10/2023	0	--	0.00	No
12/11/2023	0	--	0.00	No
12/12/2023	0	--	0.00	No
12/13/2023	0	--	0.00	No
12/14/2023	0	--	0.00	No
12/15/2023	0	--	0.00	No
12/16/2023	0	--	0.00	No
12/17/2023	0	--	0.00	No
12/18/2023	0	--	0.00	No
12/19/2023	0	--	0.00	No
12/20/2023	38,880,000	4,940	1.60	No
12/21/2023	38,880,000	4,940	1.60	No
12/22/2023	38,880,000	4,940	1.60	No
12/23/2023	0	--	0.00	No
12/24/2023	0	--	0.00	No
12/25/2023	0	--	0.00	No
12/26/2023	0	--	0.00	No
12/27/2023	0	--	0.00	No
12/28/2023	0	--	0.00	No
12/29/2023	0	--	0.00	No
12/30/2023	0	--	0.00	No
12/31/2023	0	#N/A	#N/A	#N/A

¹ Maximum daily circulation rate conservatively used to estimate PM₁₀ emissions when the cooling tower is operated for any part of the day. The circulation rate is zero for days the cooling tower is not operated at all.

² MGS was primarily offline during December 2023 for outage maintenance; therefore, a Cooling Tower Blowdown Report was not prepared during this time. For days that MGS operated during December 2023, sample results were assumed to be best represented by the results sampled on November 28, 2023.

³ Daily emissions limit established in COC AQ-C7.

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

Reporting Period: **Quarter 4 2023**

Table 6. Monthly Turbine-Duct Burner Fuel Flow

Source	October		November		December	
	Fuel Flow (MMscf/month) ¹	Above 405 MMscf/month Limit? ²	Fuel Flow (MMscf/month) ¹	Above 405 MMscf/month Limit? ²	Fuel Flow (MMscf/month) ¹	Above 405 MMscf/month Limit? ²
CTG 1	65.4		116.2		1.2	
CTG 1 Duct Burner	0.18		0.67		0.00	
Total CTG 1 & Duct Burner	66	No	117	No	1	No
CTG 2	166.7		132.9		0.8	
CTG 2 Duct Burner	0.56		0.91		0.00	
Total CTG 2 & Duct Burner	167	No	134	No	1	No

¹ CTG and Duct Burner fuel flow data obtained from 'U1/U2_MonthlySummary_MassEmissionsAndFuel' and 'All_12MonthSummary_GasUsage_Rev2' RegPerfect Reports.

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

Table 7. Monthly Emissions - October 2023

Source	Monthly Emissions (lb/month) ¹					
	NOx ²	CO	VOC	SOx	PM ₁₀ /PM _{2.5}	NH ₃ ³
CTG 1 & Duct Burner	484	201	101	18	394	598
CTG 2 & Duct Burner	1,183	418	257	47	1,006	1,527
Monthly Emission Limits ⁴	N/A	7,633	3,236	227	4,876	N/A
Exceeds Limit?	N/A	No	No	No	No	N/A

¹ Unless otherwise noted, monthly emissions data obtained from 'U1/U2_MonthlySummary_MassEmissionsAndFuel_Rev2' RegPerfect Report.

² Monthly NOx emissions are as submitted to SCAQMD, based on the 'U1_U2MonthlyRECLAIMNOxSummaryByDay_Rev2' RegPerfect Report.

³ Monthly NH₃ emissions are calculated using monthly fuel usage and default emission factors from the SCAQMD's AER AB 2588 Quadrennial Air Toxics Emission Inventory Procedures - June 2020. The emission factors are 9.1 lbs/MMscf and 18.0 lbs/MMscf for the CTGs and Duct Burners, respectively.

⁴ Monthly emission limits are per COC AQ-5.

Table 8. Monthly Emissions - November 2023

Source	Monthly Emissions (lb/month) ¹					
	NOx ²	CO	VOC	SOx	PM ₁₀ /PM _{2.5}	NH ₃ ³
CTG 1 & Duct Burner	813	318	180	33	703	1,070
CTG 2 & Duct Burner	960	346	206	37	804	1,225
Monthly Emission Limits ⁴	N/A	7,633	3,236	227	4,876	N/A
Exceeds Limit?	N/A	No	No	No	No	N/A

¹ Unless otherwise noted, monthly emissions data obtained from 'U1/U2_MonthlySummary_MassEmissionsAndFuel_Rev2' RegPerfect Report.

² Monthly NOx emissions are as submitted to SCAQMD, based on the 'U1_U2MonthlyRECLAIMNOxSummaryByDay_Rev2' RegPerfect Report.

³ Monthly NH₃ emissions are calculated using monthly fuel usage and default emission factors from the SCAQMD's AER AB 2588 Quadrennial Air Toxics Emission Inventory Procedures - June 2020. The emission factors are 9.1 lbs/MMscf and 18.0 lbs/MMscf for the CTGs and Duct Burners, respectively.

⁴ Monthly emission limits are per COC AQ-5.

Table 9. Monthly Emissions - December 2023

Source	Monthly Emissions (lb/month) ¹					
	NOx ²	CO	VOC	SOx	PM ₁₀ /PM _{2.5}	NH ₃ ³
CTG 1 & Duct Burner	60	88	2	0	7	11
CTG 2 & Duct Burner	50	94	1	0	5	7
Monthly Emission Limits ⁴	N/A	7,633	3,236	227	4,876	N/A
Exceeds Limit?	N/A	No	No	No	No	N/A

¹ Unless otherwise noted, monthly emissions data obtained from 'U1/U2_MonthlySummary_MassEmissionsAndFuel_Rev2' RegPerfect Report.

² Monthly NOx emissions are as submitted to SCAQMD, based on the 'U1_U2MonthlyRECLAIMNOxSummaryByDay_Rev2' RegPerfect Report.

³ Monthly NH₃ emissions are calculated using monthly fuel usage and default emission factors from the SCAQMD's AER AB 2588 Quadrennial Air Toxics Emission Inventory Procedures - June 2020. The emission factors are 9.1 lbs/MMscf and 18.0 lbs/MMscf for the CTGs and Duct Burners, respectively.

⁴ Monthly emission limits are per COC AQ-5.

Malburg Generating Station
Quarterly Compliance Report
Appendix A, Table 10

Reporting Period: **Quarter 4 2023**

Methodology

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

Emission Factors

Pollutant	Emission Factor (lb/Mgal)	Reference
NO _x	469	Emission factor provided in the facility's Title V Permit.
CO	13.62	Emission factor converted from the factor provided in the facility's Title V Permit (0.4 g/bhp-hr), based on the unit's power rating (173 hp) and maximum fuel throughput (11.2 gal/hr).
VOC	3.41	Emission factor converted from the factor provided in the facility's Title V Permit (0.1 g/bhp-hr), based on the unit's power rating (173 hp) and maximum fuel throughput (11.2 gal/hr).
SO _x	0.21	Default for Diesel/Distillate Oil, ICEs given in the SCAQMD's Combustion Default Emission Factors - January 2022.
PM ₁₀ /PM _{2.5}	3.065	Emission factor converted from the factor provided in the facility's Title V Permit (0.09 g/bhp-hr), based on the unit's power rating (173 hp) and maximum fuel throughput (11.2 gal/hr).
NH ₃	0.80	Default for diesel combustion equipment without an SNCR or SCR given in the SCAQMD's AER AB 2588 Quadrennial Air Toxics Emission Inventory Reporting Procedures - June 2020.

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

Month	Monthly Hours of Operation ¹			Fuel Usage (gal/month) ²	Monthly Emissions (lb/month)					
	Maintenance	Testing	Emergency		NOx	CO	VOC	SOx	PM ₁₀ /PM _{2.5}	NH ₃
January	0.0	2.5	0.0	28.0	13.1	0.38	0.10	0.01	0.09	0.02
February	0.0	2.0	0.0	22.4	10.5	0.31	0.08	0.00	0.07	0.02
March	0.0	2.0	0.0	22.4	10.5	0.31	0.08	0.00	0.07	0.02
April	0.0	2.6	0.0	29.1	13.7	0.40	0.10	0.01	0.09	0.02
May	0.0	2.5	0.0	28.0	13.1	0.38	0.10	0.01	0.09	0.02
June	0.0	2.0	0.0	22.4	10.5	0.31	0.08	0.00	0.07	0.02
July	0.0	2.5	0.0	28.0	13.1	0.38	0.10	0.01	0.09	0.02
August	0.0	2.0	0.0	22.4	10.5	0.31	0.08	0.00	0.07	0.02
September	0.0	2.0	0.0	22.4	10.5	0.31	0.08	0.00	0.07	0.02
October	0.0	2.5	0.0	28.0	13.1	0.38	0.10	0.01	0.09	0.02
November	0.0	2.0	0.0	22.4	10.5	0.31	0.08	0.00	0.07	0.02
December	0.0	1.9	0.0	21.3	9.98	0.29	0.07	0.00	0.07	0.02
Q1 Total	0.0	6.5	0.0	72.8	34.1	0.99	0.25	0.02	0.22	0.06
Q2 Total	0.0	7.1	0.0	79.5	37.3	1.08	0.27	0.02	0.24	0.06
Q3 Total	0.0	6.5	0.0	72.8	34.1	1.0	0.25	0.02	0.22	0.06
Q4 Total	0.0	6.4	0.0	71.7	33.6	1.0	0.2	0.0	0.2	0.1
Annual Total	0.0	26.5	0.0	296.8	139.2	4.0	1.0	0.1	0.9	0.2
Annual Limit for Maintenance and Testing ³			50							
Total Annual Limit ³			200							
Exceeds Limits?			No							

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

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

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

Appendix B

Cooling Tower Blowdown Reports





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

October 09, 2023

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

Report No.: 2310019

Project Name: Malburg Generating Station Weekly

Dear Matt Richards,

This report contains the analytical results for the sample(s) received under chain of custody(s) by Positive Lab Service on October 03, 2023.

The test results in this report are performed in compliance with ELAP accreditation requirements for the certified parameters. The laboratory report may not be produced, except in full, without the written approval of the laboratory.

The issuance of the final Certificate of Analysis takes precedence over any previous Preliminary Report. Preliminary data should not be used for regulatory purposes. Authorized signature(s) is provided on final report only.

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


Project Manager



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

Certificate of Analysis

Page 2 of 2

City of Vernon
4963 Soto St.
Vernon, CA 90058

File #:74548
Report Date: 10/09/23
Submitted: 10/03/23
PLS Report No.: 2310019

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

Project: Malburg Generating Station Weekly

Sample ID: Cooling Tower Blowdown Water (2310019-01) Sampled: 10/03/23 08:20 Received: 10/03/23

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
Total Dissolved Solids	4520		1	mg/L	5.0	- SM 2540C	10/03/23	10/03/23	vc	BJ30419

Quality Control Data

Analyte	Result	PQL	Units	Spike Level	Source Result	%REC Limits	RPD	RPD Limit	Qualifier
---------	--------	-----	-------	-------------	---------------	-------------	-----	-----------	-----------

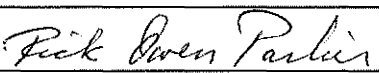
Batch BJ30419 - -

Blank		Prepared & Analyzed: 10/03/23								
Total Dissolved Solids	ND	5.0	mg/L							
LCS		Prepared & Analyzed: 10/03/23								
Total Dissolved Solids	45.0	5.0	mg/L	50.00		90.0	80-120			
Duplicate Source: 2309189-05		Prepared & Analyzed: 10/03/23								
Total Dissolved Solids	2580	5.0	mg/L		2600			0.772	5	
Duplicate Source: 2309189-03		Prepared & Analyzed: 10/03/23								
Total Dissolved Solids	1700	5.0	mg/L		1700			0.00	5	

Notes and Definitions

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

Environmental Laboratory Accreditation Program Certificate No. 1131, Mobile Lab No. 2534, LACSD No. 10138


Authorized Signature(s)



CHAIN OF CUSTODY AND ANALYSIS REQUEST

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

DATE: 10/3/23 PAGE: 1 OF 1

FILE NO.: LAB NO.: 2310019

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

ADDRESS: 4963 SOTO ST. VERNON CA 90058 ANALYSES REQUESTED OBSERVED TEMP 13°C

PROJECT MANAGER MATT RICHARDS PHONE NO: FAX NO: CORRECTED TEMP: 15°C

SAMPLER NAME: JOHN BARIE SIGNATURE: [Signature] THERMO ID: 60

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

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

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

SAMPLE ID	DATE SAMPLED	TIME SAMPLED	SAMPLE DESCRIPTION	MATRIX				TAT	CONTAINER		TDS									SAMPLE CONDITIONS/ CONTAINER/COMMENTS
				WATER	SOIL	SLUDGE	OTHER		#	TYPE										
	10/3/23	0820	COOLING TOWER BLOWDOWN	X				N	1	P	X									

Relinquished by (Signature& Name): <u>[Signature]</u>	Received by (Signature & Name): <u>[Signature]</u> <u>John Barie</u>	Date: <u>10/3/23</u>	Time: <u>0820</u>	SAMPLE DISPOSITION 1. Samples returned to client? Yes No 2. Samples will not be stored over 30 days, unless additional storage time is requested 3. Storage time requested: _____ days, By: _____ Date: _____
Relinquished by (Signature& Name):	Received by (Signature & Name):	Date:	Time:	
Relinquished by (Signature& Name):	Received by (Signature & Name):	Date:	Time:	

SPECIAL INSTRUCTION: Arrived at the lab 10/3/23 1020

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



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

October 17, 2023

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

Report No.: 2310054
Project Name: Malburg Generating Station Weekly

Dear Matt Richards,

This report contains the analytical results for the sample(s) received under chain of custody(s) by Positive Lab Service on October 09, 2023.

The test results in this report are performed in compliance with ELAP accreditation requirements for the certified parameters. The laboratory report may not be produced, except in full, without the written approval of the laboratory.

The issuance of the final Certificate of Analysis takes precedence over any previous Preliminary Report. Preliminary data should not be used for regulatory purposes. Authorized signature(s) is provided on final report only.

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

A handwritten signature in black ink, appearing to read "John Schwelt", is written over a horizontal line.

Project Manager



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

Certificate of Analysis

Page 2 of 2

City of Vernon
4963 Soto St.
Vernon, CA 90058

Attn: Matt Richards

Phone: (323) 476-3626 FAX:(323) 476-3640

File #:74548

Report Date: 10/17/23

Submitted: 10/09/23

PLS Report No.: 2310054

Project: Malburg Generating Station Weekly

Sample ID: Cooling Tower Blowdown Water (2310054-01) Sampled: 10/09/23 08:35 Received: 10/09/23

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
Total Dissolved Solids	4180		1	mg/L	5.0	SM 2540C	10/10/23	10/11/23	vc	BJ31219

Quality Control Data

Analyte	Result	PQL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifier
Batch BJ31219 - -										
Blank										
Prepared: 10/10/23 Analyzed: 10/11/23										
Total Dissolved Solids	ND	5.0	mg/L							
LCS										
Prepared: 10/10/23 Analyzed: 10/11/23										
Total Dissolved Solids	58.0	5.0	mg/L	50.00		116	80-120			
Duplicate										
Source: 2310054-01 Prepared: 10/10/23 Analyzed: 10/11/23										
Total Dissolved Solids	4290	5.0	mg/L		4180			2.55	5	

Notes and Definitions

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

Environmental Laboratory Accreditation Program Certificate No. 1131, Mobile Lab No. 2534, LACSD No. 10138

Authorized Signature(s)



CHAIN OF CUSTODY AND ANALYSIS REQUEST

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

DATE: 10-9-23 PAGE: 1 OF 1

FILE NO.: LAB NO.: 2310054

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

ADDRESS: 4963 SOTO ST. VERNON CA 90058 ANALYSES REQUESTED OBSERVED TEMP: 1.0%

PROJECT MANAGER MATT RICHARDS PHONE NO: FAX NO: CORRECTED TEMP: 1.2%

SAMPLER NAME: JOHN BARIE SIGNATURE: [Signature] THERMO ID: 66

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

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

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

SAMPLE ID	DATE SAMPLED	TIME SAMPLED	SAMPLE DESCRIPTION	MATRIX				TAT	CONTAINER		TDS									SAMPLE CONDITIONS/ CONTAINER/COMMENTS
				WATER	SOIL	SLUDGE	OTHER		#	TYPE										
	<u>10-9-23</u>	<u>0835</u>	COOLING TOWER BLOWDOWN	X				N	1	P	X									

Relinquished by (Signature& Name): <u>[Signature]</u>	Received by (Signature & Name): <u>[Signature]</u>	Date: <u>10-9-23</u>	Time: <u>0835</u>	SAMPLE DISPOSITION 1. Samples returned to client? Yes No 2. Samples will not be stored over 30 days, unless additional storage time is requested 3. Storage time requested: _____ days, By: _____ Date: _____
Relinquished by (Signature& Name):	Received by (Signature & Name):	Date:	Time:	
Relinquished by (Signature& Name):	Received by (Signature & Name):	Date:	Time:	

SPECIAL INSTRUCTION:

Arrived at the lab 10-9-23 1000

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



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

October 27, 2023

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

Report No.: 2310103
Project Name: Malburg Generating Station Weekly

Dear Matt Richards,

This report contains the analytical results for the sample(s) received under chain of custody(s) by Positive Lab Service on October 17, 2023.

The test results in this report are performed in compliance with ELAP accreditation requirements for the certified parameters. The laboratory report may not be produced, except in full, without the written approval of the laboratory.

The issuance of the final Certificate of Analysis takes precedence over any previous Preliminary Report. Preliminary data should not be used for regulatory purposes. Authorized signature(s) is provided on final report only.

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

A handwritten signature in black ink that reads "John Schmitt". The signature is written in a cursive, flowing style.

Project Manager



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

Certificate of Analysis

Page 2 of 2

City of Vernon
4963 Soto St.
Vernon, CA 90058

Attn: Matt Richards

Phone: (323) 476-3626 FAX: (323) 476-3640

File #: 74548

Report Date: 10/27/23

Submitted: 10/17/23

PLS Report No.: 2310103

Project: Malburg Generating Station Weekly

Sample ID: Cooling Tower Blowdown Water (2310103-01) Sampled: 10/17/23 08:25 Received: 10/17/23

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
Total Dissolved Solids	5390		1	mg/L	5.0	SM 2540C	10/24/23	10/25/23	mv	BJ32612

Quality Control Data

Analyte	Result	PQL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifier
Batch BJ32612 - -										
Blank										
Prepared: 10/24/23 Analyzed: 10/25/23										
Total Dissolved Solids	ND	5.0	mg/L							
LCS										
Prepared: 10/24/23 Analyzed: 10/25/23										
Total Dissolved Solids	55.0	5.0	mg/L	50.00		110	80-120			
Duplicate										
Source: 2310103-01 Prepared: 10/24/23 Analyzed: 10/25/23										
Total Dissolved Solids	5450	5.0	mg/L		5390			1.04	5	

Notes and Definitions

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

Environmental Laboratory Accreditation Program Certificate No. 1131, Mobile Lab No. 2534, LACSD No. 10138

Authorized Signature(s)

CHAIN OF CUSTODY AND ANALYSIS REQUEST



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

October 30, 2023

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

Report No.: 2310132
Project Name: Malburg Generating Station Weekly

Dear Matt Richards,

This report contains the analytical results for the sample(s) received under chain of custody(s) by Positive Lab Service on October 23, 2023.

The test results in this report are performed in compliance with ELAP accreditation requirements for the certified parameters. The laboratory report may not be produced, except in full, without the written approval of the laboratory.

The issuance of the final Certificate of Analysis takes precedence over any previous Preliminary Report. Preliminary data should not be used for regulatory purposes. Authorized signature(s) is provided on final report only.

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

A handwritten signature in black ink, appearing to read "John Schwab", is written over a horizontal line.

Project Manager



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

Certificate of Analysis

Page 2 of 2

City of Vernon
4963 Soto St.
Vernon, CA 90058

Attn: Matt Richards

Phone: (323) 476-3626 FAX: (323) 476-3640

File #: 74548

Report Date: 10/30/23

Submitted: 10/23/23

PLS Report No.: 2310132

Project: Malburg Generating Station Weekly

Sample ID: Cooling Tower Blowdown Water (2310132-01) Sampled: 10/23/23 08:55 Received: 10/23/23

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
Total Dissolved Solids	5030		1	mg/L	5.0	- SM 2540C	10/24/23	10/25/23	mv	BJ32612

Quality Control Data

Analyte	Result	PQL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifier
Batch BJ32612 --										
Blank										
Prepared: 10/24/23 Analyzed: 10/25/23										
Total Dissolved Solids	ND	5.0	mg/L							
LCS										
Prepared: 10/24/23 Analyzed: 10/25/23										
Total Dissolved Solids	55.0	5.0	mg/L	50.00		110	80-120			
Duplicate										
Source: 2310103-01 Prepared: 10/24/23 Analyzed: 10/25/23										
Total Dissolved Solids	5450	5.0	mg/L		5390			1.04	5	

Notes and Definitions

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

Environmental Laboratory Accreditation Program Certificate No. 1131, Mobile Lab No. 2534, LACSD No. 10138

Authorized Signature(s)



CHAIN OF CUSTODY AND ANALYSIS REQUEST

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

DATE: 10/23/23 PAGE: 1 OF 1

FILE NO.: LAB NO.: 131032

CLIENT NAME: CITY OF VERNON				PROJECT NAME/NO. MALBURG GENERATING STATION WEEKLY				P.O.NO.				AIRBILL NO:											
ADDRESS: 4963 SOTO ST. VERNON CA 90058								ANALYSES REQUESTED								OBSERVED TEMP <u>12.2</u>							
PROJECT MANAGER MATT RICHARDS				PHONE NO:				FAX NO:				CORRECTED TEMP <u>11.22</u>											
SAMPLER NAME: JOHN BARIE				SIGNATURE: <u>[Signature]</u>								THERMO ID: <u>60</u>											
TAT (Turn-Around-Time): 0=Same Day; 1=24 Hour; 2=48Hour; (ETC.) N=Normal																							
CONTAINER TYPES: B=Brass; E=Encore/Easy Draw; P=Plastic; G=Glass; V=VOA Vial; O=Other																							
UST PROJECT: Y N GLOBAL ID#: --- -- -- -- -- -- -- -- --																							
SAMPLE ID	DATE SAMPLED	TIME SAMPLED	SAMPLE DESCRIPTION	MATRIX				TAT	CONTAINER		TDS					SAMPLE CONDITIONS/ CONTAINER/COMMENTS							
				WATER	SOIL	SLUDGE	OTHER		#	TYPE													
	<u>10/23/23</u>	<u>0855</u>	COOLING TOWER BLOWDOWN	X				N	1	P	X												
Relinquished by (Signature& Name): <u>MA</u>												Received by (Signature & Name): <u>[Signature]</u>				Date: <u>10/23/23</u> Time: <u>0855</u>				SAMPLE DISPOSITION 1. Samples returned to client? Yes No 2. Samples will not be stored over 30 days, unless additional storage time is requested 3. Storage time requested: _____ days, By: _____ Date: _____			
Relinquished by (Signature& Name):												Received by (Signature & Name):				Date: Time:							
Relinquished by (Signature& Name):												Received by (Signature & Name):				Date: Time:							
SPECIAL INSTRUCTION: Arrived at the lab <u>10/23/23 0935</u>																							

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



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

November 08, 2023

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

Report No.: 2310174
Project Name: Malburg Generating Station Weekly

Dear Matt Richards,

This report contains the analytical results for the sample(s) received under chain of custody(s) by Positive Lab Service on October 30, 2023.

The test results in this report are performed in compliance with ELAP accreditation requirements for the certified parameters. The laboratory report may not be produced, except in full, without the written approval of the laboratory.

The issuance of the final Certificate of Analysis takes precedence over any previous Preliminary Report. Preliminary data should not be used for regulatory purposes. Authorized signature(s) is provided on final report only.

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

A handwritten signature in black ink that reads "John Schmidt". The signature is written in a cursive style with a horizontal line extending from the end.

Project Manager



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

Certificate of Analysis

Page 2 of 2

City of Vernon
4963 Soto St.
Vernon, CA 90058

Attn: Matt Richards

Phone: (323) 476-3626 FAX: (323) 476-3640

File #: 74548
Report Date: 11/08/23
Submitted: 10/30/23
PLS Report No.: 2310174

Project: Malburg Generating Station Weekly

Sample ID: Cooling Tower Blowdown Water (2310174-01) Sampled: 10/30/23 08:00 Received: 10/30/23

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
Total Dissolved Solids	4980		1	mg/L	5.0	SM 2540C	11/06/23	11/07/23	ss	BK30815

Quality Control Data

Analyte	Result	PQL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifier
---------	--------	-----	-------	-------------	---------------	------	-------------	-----	-----------	-----------

Batch BK30815 - -

Blank Prepared: 11/06/23 Analyzed: 11/07/23

Total Dissolved Solids ND 5.0 mg/L

LCS Prepared: 11/06/23 Analyzed: 11/07/23

Total Dissolved Solids 58.0 5.0 mg/L 50.00 116 80-120

Duplicate Source: 2310174-01 Prepared: 11/06/23 Analyzed: 11/07/23

Total Dissolved Solids 4970 5.0 mg/L 4980 0.235 5

Notes and Definitions

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

Environmental Laboratory Accreditation Program Certificate No. 1131, Mobile Lab No. 2534, LACSD No. 10138

Authorized Signature(s)



CHAIN OF CUSTODY AND ANALYSIS REQUEST

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

DATE: 10/30/23 PAGE: 1 OF 1

FILE NO.: LAB NO.: 2310174

CLIENT NAME: CITY OF VERNON

PROJECT NAME/NO.

MALBURG GENERATING STATION WEEKLY

P.O.NO.

AIRBILL NO:

ADDRESS: 4963 SOTO ST. VERNON CA 90058

ANALYSES REQUESTED

OBSERVED TEMP: 0.9°C

PROJECT MANAGER MATT RICHARDS

PHONE NO:

FAX NO:

CORRECTED TEMP: 1.1°C

SAMPLER NAME: JOHN BARIE

SIGNATURE: [Signature]

THERMO ID: 66

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

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

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

SAMPLE ID	DATE SAMPLED	TIME SAMPLED	SAMPLE DESCRIPTION	MATRIX				TAT	CONTAINER		TDS											SAMPLE CONDITIONS/ CONTAINER/COMMENTS
				WATER	SOIL	SLUDGE	OTHER		#	TYPE												
	10/30/23	0800	COOLING TOWER BLOWDOWN	X				N	1	P	X											

Relinquished by (Signature& Name):

Received by (Signature & Name):

Date:

Time:

SAMPLE DISPOSITION

Relinquished by (Signature& Name):

Received by (Signature & Name):

Date:

Time:

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

SPECIAL INSTRUCTION:

Arrived at the lab 10/30/23 1030

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



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

November 21, 2023

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

Report No.: 2311039
Project Name: Malburg Generating Station Weekly

Dear Matt Richards,

This report contains the analytical results for the sample(s) received under chain of custody(s) by Positive Lab Service on November 07, 2023.

The test results in this report are performed in compliance with ELAP accreditation requirements for the certified parameters. The laboratory report may not be produced, except in full, without the written approval of the laboratory.

The issuance of the final Certificate of Analysis takes precedence over any previous Preliminary Report. Preliminary data should not be used for regulatory purposes. Authorized signature(s) is provided on final report only.

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


Project Manager



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

Certificate of Analysis

Page 2 of 2

City of Vernon
4963 Soto St.
Vernon, CA 90058

Attn: Matt Richards

Phone: (323) 476-3626 FAX: (323) 476-3640

File #: 74548
Report Date: 11/21/23
Submitted: 11/07/23
PLS Report No.: 2311039

Project: Malburg Generating Station Weekly

Sample ID: Cooling Tower Blowdown Water (2311039-01) **Sampled:** 11/07/23 07:55 **Received:** 11/07/23

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
Total Dissolved Solids	4080		1	mg/L	5.0	SM 2540C	11/13/23	11/14/23	ss	BK3211

Quality Control Data

Analyte	Result	PQL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifier
Batch BK32110 - -										
Blank										
Prepared: 11/13/23 Analyzed: 11/14/23										
Total Dissolved Solids	ND	5.0	mg/L							
LCS										
Prepared: 11/13/23 Analyzed: 11/14/23										
Total Dissolved Solids	60.0	5.0	mg/L	50.00		120	80-120			
Duplicate										
Source: 2311062-03 Prepared: 11/13/23 Analyzed: 11/14/23										
Total Dissolved Solids	413	5.0	mg/L		425			2.79	5	

Notes and Definitions

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

Environmental Laboratory Accreditation Program Certificate No. 1131, Mobile Lab No. 2534, LACSD No. 10138

Pick Owen Parker

Authorized Signature(s)



CHAIN OF CUSTODY AND ANALYSIS REQUEST

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

DATE: 11-7-23 PAGE: 1 OF 1

FILE NO.: LAB NO.: 2311039

CLIENT NAME: CITY OF VERNON				PROJECT NAME/NO. MALBURG GENERATING STATION WEEKLY				P.O.NO.				AIRBILL NO:							
ADDRESS: 4963 SOTO ST. VERNON CA 90058												ANALYSES REQUESTED				OBSERVED TEMP <u>1.0°C</u>			
PROJECT MANAGER MATT RICHARDS				PHONE NO:				FAX NO:				CORRECTED TEMP: <u>1.2°C</u>							
SAMPLER NAME: JOHN BARIE				SIGNATURE: <u>[Signature]</u>				TDS				THERMO ID: <u>60</u>							
TAT (Turn-Around-Time): 0=Same Day; 1=24 Hour; 2=48Hour; (ETC.) N=Normal																			
CONTAINER TYPES: B=Brass; E=Encore/Easy Draw; P=Plastic; G=Glass; V=VOA Vial; O=Other																			
UST PROJECT: Y N GLOBAL ID#: -----																			
SAMPLE ID	DATE SAMPLED	TIME SAMPLED	SAMPLE DESCRIPTION	MATRIX				TAT	CONTAINER		#	TYPE	SAMPLE CONDITIONS/CONTAINER/COMMENTS						
				WATER	SOIL	SLUDGE	OTHER												
	<u>11-7-23</u>	<u>0755</u>	COOLING TOWER BLOWDOWN	X				N	1	P	X								
Relinquished by (Signature& Name): <u>[Signature]</u>				Received by (Signature & Name): <u>[Signature]</u>				Date: <u>11-7-23</u>		Time: <u>0800</u>		SAMPLE DISPOSITION 1. Samples returned to client? Yes No 2. Samples will not be stored over 30 days, unless additional storage time is requested 3. Storage time requested: _____ days, By: _____ Date: _____							
Relinquished by (Signature& Name):				Received by (Signature & Name):				Date:		Time:									
Relinquished by (Signature& Name):				Received by (Signature & Name):				Date:		Time:									
SPECIAL INSTRUCTION: <u>Arrived at the lab 11-7-23 1020</u>																			

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



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

December 01, 2023

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

Report No.: 2311086
Project Name: Malburg Generating Station Weekly

Dear Matt Richards,

This report contains the analytical results for the sample(s) received under chain of custody(s) by Positive Lab Service on November 13, 2023.

The test results in this report are performed in compliance with ELAP accreditation requirements for the certified parameters. The laboratory report may not be produced, except in full, without the written approval of the laboratory.

The issuance of the final Certificate of Analysis takes precedence over any previous Preliminary Report. Preliminary data should not be used for regulatory purposes. Authorized signature(s) is provided on final report only.

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


Project Manager



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

Certificate of Analysis

Page 2 of 2

City of Vernon
4963 Soto St.
Vernon, CA 90058

File #:74548
Report Date: 12/01/23
Submitted: 11/13/23
PLS Report No.: 2311086

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

Project: Malburg Generating Station Weekly

Sample ID: Cooling Tower Blowdown Water (2311086-01) Sampled: 11/13/23 07:15 Received: 11/13/23

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
Total Dissolved Solids	4420		1	mg/L	5.0	- SM 2540C	11/16/23	11/17/23	ss	BK33024

Quality Control Data

Analyte	Result	PQL	Units	Spike Level	Source Result	%REC Limits	RPD	RPD Limit	Qualifier
Batch BK33024 - -									
Blank Prepared: 11/16/23 Analyzed: 11/17/23									
Total Dissolved Solids	ND	5.0	mg/L						
LCS Prepared: 11/16/23 Analyzed: 11/17/23									
Total Dissolved Solids	58.0	5.0	mg/L	50.00	116	80-120			
Duplicate Source: 2311093-05 Prepared: 11/16/23 Analyzed: 11/17/23									
Total Dissolved Solids	573	5.0	mg/L		580		1.16	5	

Notes and Definitions

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

Environmental Laboratory Accreditation Program Certificate No. 1131, Mobile Lab No. 2534, LACSD No. 10138

Authorized Signature(s)



CHAIN OF CUSTODY AND ANALYSIS REQUEST

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

DATE: 11-13-23 PAGE: 1 OF 1

FILE NO.: LAB NO.: 2311086

CLIENT NAME: CITY OF VERNON

PROJECT NAME/NO.

MALBURG GENERATING STATION WEEKLY

P.O.NO.

AIRBILL NO:

ADDRESS: 4963 SOTO ST. VERNON CA 90058

ANALYSES REQUESTED

OBSERVED TEMP: 10.2°C

PROJECT MANAGER MATT RICHARDS

PHONE NO:

FAX NO:

CORRECTED TEMP: 1.2°C

SAMPLER NAME: JOHN BARIE

SIGNATURE: [Signature]

THERMO ID: 60

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

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

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

SAMPLE ID	DATE SAMPLED	TIME SAMPLED	SAMPLE DESCRIPTION	MATRIX				TAT	CONTAINER		TDS											SAMPLE CONDITIONS/ CONTAINER/COMMENTS
				WATER	SOIL	SLUDGE	OTHER		#	TYPE												
	11-13-23	0715	COOLING TOWER BLOWDOWN	X				N	1	P	X											

Relinquished by (Signature& Name):

Received by (Signature & Name):

Date:

Time:

SAMPLE DISPOSITION

Relinquished by (Signature& Name):

Received by (Signature & Name):

Date:

Time:

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

SPECIAL INSTRUCTION:

Arrived at the lab 11-13-23 0845

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



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

December 08, 2023

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

Report No.: 2311190
Project Name: Malburg Generating Station Weekly

Dear Matt Richards,

This report contains the analytical results for the sample(s) received under chain of custody(s) by Positive Lab Service on November 21, 2023.

The test results in this report are performed in compliance with ELAP accreditation requirements for the certified parameters. The laboratory report may not be produced, except in full, without the written approval of the laboratory.

The issuance of the final Certificate of Analysis takes precedence over any previous Preliminary Report. Preliminary data should not be used for regulatory purposes. Authorized signature(s) is provided on final report only.

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

A handwritten signature in cursive script that reads "Rick Owen Parker".

Project Manager



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

Certificate of Analysis

Page 2 of 2

City of Vernon
4963 Soto St.
Vernon, CA 90058

Attn: Matt Richards

Phone: (323) 476-3626 FAX: (323) 476-3640

File #: 74548

Report Date: 12/08/23

Submitted: 11/21/23

PLS Report No.: 2311190

Project: Malburg Generating Station Weekly

Sample ID: Cooling Tower Blowdown Water (2311190-01) Sampled: 11/21/23 08:00 Received: 11/21/23

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
Total Dissolved Solids	4290		1	mg/L	5.0	- SM 2540C	11/30/23	12/01/23	ss	BL30718

Quality Control Data

Analyte	Result	PQL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifier
Batch BL30718 - -										
Blank										
Prepared: 11/30/23 Analyzed: 12/01/23										
Total Dissolved Solids	ND	5.0	mg/L							
LCS										
Prepared: 11/30/23 Analyzed: 12/01/23										
Total Dissolved Solids	60.0	5.0	mg/L	50.00		120	80-120			
Duplicate										
Source: 2311190-01 Prepared: 11/30/23 Analyzed: 12/01/23										
Total Dissolved Solids	4280	5.0	mg/L		4290			0.233	5	

Notes and Definitions

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

Environmental Laboratory Accreditation Program Certificate No. 1131, Mobile Lab No. 2534, LACSD No. 10138

Authorized Signature(s)



CHAIN OF CUSTODY AND ANALYSIS REQUEST

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

DATE: 11-21-23 PAGE: 1 OF 1

FILE NO.: LAB NO.: 2311190

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

ADDRESS: 4963 SOTO ST. VERNON CA 90058 ANALYSES REQUESTED

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

SAMPLER NAME: JOHN BARIE SIGNATURE: CORRECTED TEMP: 1.6°C

TAT (Turn-Around-Time): 0=Same Day; 1=24 Hour; 2=48Hour; (ETC.) N=Normal Tw THERMO ID: 66

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

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

SAMPLE ID	DATE SAMPLED	TIME SAMPLED	SAMPLE DESCRIPTION	MATRIX				TAT	CONTAINER		TDS									SAMPLE CONDITIONS/CONTAINER/COMMENTS
				WATER	SOIL	SLUDGE	OTHER		#	TYPE										
	<u>11/21/23</u>	<u>0800</u>	COOLING TOWER BLOWDOWN	X				N	1	P	X									

Relinquished by (Signature& Name): <u>MA</u>	Received by (Signature & Name): <u>John Barie</u>	Date: <u>11/21/23</u>	Time: <u>0800</u>	SAMPLE DISPOSITION 1. Samples returned to client? Yes No 2. Samples will not be stored over 30 days, unless additional storage time is requested 3. Storage time requested: _____ days, By: _____ Date: _____
Relinquished by (Signature& Name):	Received by (Signature & Name):	Date:	Time:	
Relinquished by (Signature& Name):	Received by (Signature & Name):	Date:	Time:	

SPECIAL INSTRUCTION:

Arrived at the lab 11/21/23 0925

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



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

December 08, 2023

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

Report No.: 2311219
Project Name: Malburg Generating Station Weekly

Dear Matt Richards,

This report contains the analytical results for the sample(s) received under chain of custody(s) by Positive Lab Service on November 28, 2023.

The test results in this report are performed in compliance with ELAP accreditation requirements for the certified parameters. The laboratory report may not be produced, except in full, without the written approval of the laboratory.

The issuance of the final Certificate of Analysis takes precedence over any previous Preliminary Report. Preliminary data should not be used for regulatory purposes. Authorized signature(s) is provided on final report only.

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

A handwritten signature in cursive script that reads "Rick Owen Parker".

Project Manager



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

Certificate of Analysis

Page 2 of 2

City of Vernon
4963 Soto St.
Vernon, CA 90058

Attn: Matt Richards

Phone: (323) 476-3626 FAX:(323) 476-3640

File #:74548
Report Date: 12/08/23
Submitted: 11/28/23
PLS Report No.: 2311219

Project: Malburg Generating Station Weekly

Sample ID: Cooling Tower Blowdown Water (2311219-01) Sampled: 11/28/23 07:05 Received: 11/28/23

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
Total Dissolved Solids	4940		1	mg/L	5.0	- SM 2540C	11/30/23	12/01/23	ss	BL30718

Quality Control Data

Analyte	Result	PQL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifier
Batch BL30718 - -										
Blank Prepared: 11/30/23 Analyzed: 12/01/23										
Total Dissolved Solids	ND	5.0	mg/L							
LCS Prepared: 11/30/23 Analyzed: 12/01/23										
Total Dissolved Solids	60.0	5.0	mg/L	50.00		120	80-120			
Duplicate Source: 2311190-01 Prepared: 11/30/23 Analyzed: 12/01/23										
Total Dissolved Solids	4280	5.0	mg/L		4290			0.233	5	

Notes and Definitions

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

Environmental Laboratory Accreditation Program Certificate No. 1131, Mobile Lab No. 2534, LACSD No. 10138

Authorized Signature(s)



CHAIN OF CUSTODY AND ANALYSIS REQUEST

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

DATE: 11/28/23 PAGE: 1 OF 1

FILE NO.: LAB NO.: 2311219

CLIENT NAME: CITY OF VERNON

PROJECT NAME/NO.

MALBURG GENERATING STATION WEEKLY

P.O.NO.

AIRBILL NO:

ADDRESS: 4963 SOTO ST. VERNON CA 90058

ANALYSES REQUESTED

OBSERVED TEMP: 7.0°C

PROJECT MANAGER MATT RICHARDS

PHONE NO:

FAX NO:

CORRECTED TEMP: 6.2°C

SAMPLER NAME: JOHN BARIE

SIGNATURE: John BarieTHERMO ID: 6

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

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

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

SAMPLE ID	DATE SAMPLED	TIME SAMPLED	SAMPLE DESCRIPTION	MATRIX				TAT	CONTAINER		TDS									SAMPLE CONDITIONS/ CONTAINER/COMMENTS
				WATER	SOIL	SLUDGE	OTHER		#	TYPE										
	<u>11/28/23</u>	<u>0705</u>	COOLING TOWER BLOWDOWN	X				N	1	P	X									

Relinquished by (Signature & Name):

Received by (Signature & Name):

Date:

Time:

SAMPLE DISPOSITION

MAJohn Barie11/28/230705

1. Samples returned to client? Yes No

Relinquished by (Signature & Name):

Received by (Signature & Name):

Date:

Time:

2. Samples will not be stored over 30 days,
unless additional storage time is requested

Relinquished by (Signature & Name):

Received by (Signature & Name):

Date:

Time:

3. Storage time requested: _____ days,

By: _____ Date: _____

SPECIAL INSTRUCTION:

Arrived at the lab 11/28/23 0930

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

Appendix C

Operation Logs



Malburg Generating Station
Appendix C, Table 1
Combustion Turbine Generator (CTG) Startup and Shutdown Events
During Quarter 4, 2023

CTG 1

Date	Event Type ¹	Event Start	Event End	Duration (hrs:min)
10/17/2023	Cold Start	15:41	16:50	1:09
10/26/2023	Stop	12:46	12:55	0:09
11/16/2023	Cold Start	17:23	18:31	1:08
11/30/2023	Stop	23:01	23:10	0:09
12/20/2023	Cold Start	20:45	22:13	1:28
12/21/2023	Stop	0:23	0:33	0:10

CTG 2

Date	Event Type ¹	Event Start	Event End	Duration (hrs:min)
10/17/2023	Stop	20:56	21:04	0:08
10/26/2023	Cold Start	11:48	13:01	1:13
11/16/2023	Stop	21:51	21:59	0:08
11/29/2023	Cold Start	14:42	16:03	1:21
11/30/2023	Stop	23:35	23:43	0:08
12/22/2023	Cold Start	10:00	11:32	1:32
12/22/2023	Stop	12:32	12:42	0:10

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

Malburg Generating Station
Appendix C, Table 2
Diesel Firewater Pump Testing Times
During Quarter 4, 2023

Date	Time (hh:mm)	Start Hours	End Hours	Event Type	Hours of Operation
10/1/2023	20:38	375.3	375.8	Testing	0.5
10/8/2023	20:03	375.8	376.3	Testing	0.5
10/15/2023	19:06	376.3	376.8	Testing	0.5
10/22/2023	21:15	376.8	377.3	Testing	0.5
10/29/2023	21:31	377.3	377.8	Testing	0.5
11/5/2023	18:31	377.8	378.3	Testing	0.5
11/12/2023	20:12	378.3	378.8	Testing	0.5
11/19/2023	19:36	378.8	379.3	Testing	0.5
11/26/2023	18:07	379.3	379.8	Testing	0.5
12/5/2023	10:35	379.8	380.3	Testing	0.5
12/17/2023	20:19	380.3	380.8	Testing	0.5
12/24/2023	21:49	380.8	381.2	Testing	0.4
12/31/2023	19:04	381.2	381.7	Testing	0.5

Appendix D

Diesel Fuel Oil Purchase Records





SALES QUOTE

ORDER NUMBER: 2425945

DATE: 7/6/2023

TERMS: N30

SALES REP: Todd Cripps

PHONE: 714-938-5714

SC Commercial, LLC, DBA SC Fuels
1800 West Katella Ave., Suite 400
P.O. Box 14237, Orange, CA 92863-4159

Ph: (800) 659-5823 Credit Inquiries: (888) SCFUELS Ext. 6017

PO#: QUOTE

SHIP DATE: 12/31/5999

ROM:

SHIP VIA:

WHSE: 101

ACCT NO (Bill-to): 01-0001045

CITY OF VERNON
4305 SANTA FE AVE
ATTN: DEPARTMENT D
VERNON, CA 90058
(323) 583-8811

ACCT NO (Ship-to) 01-0001045 103L

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

MY COPY

HM	ITEM CODE	ITEM DESCRIPTION	QTY ORDERED	QTY DEL	PACKAGE DESC	EXTENDED QTY	UNIT PRICE	EXT PRICE
	O: TODD C / POC: ROB 562-208-0808 / DEL HOURS 8AM - 2PM							
X	NA1993, DIESEL FUEL, 3 PG III / CARGO TANK							
	422D055	DYED CARB ULS DIESEL NON TAXABLE USE ONLY - PENALTY FOR TAXABLE USE 15 PPM OR LESS SULFUR - MAY CONTAIN UP TO 5% BIODIESEL	2.00		55 G DR	110.00 GALS	5.70	626.92
		Federal Lust				0.00100		0.11
		Federal Oil Spill				0.00214		0.24
		CA - AB 32 - DSL				0.00950		1.05
		Fed Superfund Fee				0.00391		0.43
						5.71585		628.75
	CH235120981D05 5	CH DELO 400 SAE 40 235120981	1.00		55 G DR	55.00 GALS	19.52	1,073.60
		CA Oil Recycling Fee				0.24000		13.20
		CA Lube Fee				0.05000		2.75
						19.81000		1,089.55
	DRUMDEPOSITC 001	DRUM DEPOSIT FEE	3.00		MISC CHRG	3.00 EACH	25.00	75.00
	/FUELCHLUBE	FUEL SURCHARGE LUBES						9.92
	/RCFLUBE	REG COMPLIANCE FEE LUBES						12.95
	**Prices quoted are <u>not</u> firm and are subject to change based upon product availability, quantity delivered and market fluctuations							
						Net Order:		1,816.17
						Less Discount:		0.00
						Freight:		0.00
						Sales Tax:		153.71
						Order Total:		1,969.88

Invoice

Page 1 of 1



SC Commercial, LLC, DBA SC Fuels
1800 West Katella Ave, Suite 400
P.O. Box 4159, Orange, CA 92863-4159

PLEASE REMIT ALL PAYMENTS TO:

P.O. BOX 14237
ORANGE, CA 92863-1237

Ph: (800) 659-5823 Credit Inquiries: (888) SCFUELS Ext.6017

INVOICE: 2425945-IN

INVOICE DATE: 7/28/2023

DUE DATE: 8/27/2023

SHIP DATE: 7/28/2023

SHIP VIA: 910

ORDER DATE: 7/6/2023

ORDER NUMBER: 2425945

CUSTOMER PO: 00240105

TERMS: N30

SALEPERSON: Todd Cripps
714-938-5714

ACCT NO (Bill-to): 01-0001045

CITY OF VERNON
4305 SANTA FE AVE
ATTN: DEPARTMENT D
VERNON, CA 90058
(323) 583-8811

ACCT NO (Ship-to) 01-0001045 103L

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

ITEM CODE	ITEM DESCRIPTION	QUANTITY ORDERED	QUANTITY DELIVERED	PACKAGE DESCRIPTION	EXTENDED QTY	UNIT PRICE	EXT PRICE
422D055	DYED CARB ULS DIESEL NON TAXABLE USE ONLY - PENALTY FOR TAXABLE USE 15 PPM OR LESS SULFUR - MAY CONTAIN UP TO 5% BIODIESEL MTO	2	2.00	55 G DR	110.00	6.10800	671.88
	Federal Lust					0.00100	0.11
	Federal Oil Spill					0.00214	0.24
	CA - AB 32 - DSL					0.00950	1.05
	Fed Superfund Fee					0.00391	0.43
						6.12455	673.71
CH235120981D05 5	CH DELO 400 SAE 40 235120981 MTO	1	1.00	55 G DR	55.00	19.52000	1,073.60
	CA Oil Recycling Fee					0.24000	13.20
	CA Lube Fee					0.05000	2.75
						19.81000	1,089.55
DRUMDEPOSITC 001	DRUM DEPOSIT FEE	3	3.00	MISC CHRG	3.00	25.00000	75.00
	/FUELCHLUBE FUEL SURCHARGE LUBES						9.92
	/RCFLUBE REG COMPLIANCE FEE LUBES						12.95

Save time, pay online! View invoices, make payments and more.
Sign up for the Customer Portal today. Email: creditinquiries@scfuels.com or Call 888-SCFuels
Ext. 6017 or login to Customer Portal: <https://customerportal.scfuels.com>
24-hour Emergency Response Call CHEMTREC: 800-424-9300

Net Invoice: 1,861.13
Less Discount: 0.00
Freight: 0.00
Sales Tax: 156.55
Invoice Total: 2,017.68

- IN THE EVENT THAT THE ABOVE CHARGES ARE NOT PAID WHEN DUE, SC COMMERCIAL, LLC, DBA SC FUELS RESERVES THE RIGHT TO REFUSE FURTHER
- CHARGES TO THE ACCOUNT. A SERVICE CHARGE OF 1.5% PER MONTH(A.P.R. 18%) WILL APPLY TO ALL PAST DUE INVOICES.
- ERRORS IN PRICE, EXTENSION, AND ADDITION SUBJECT TO CORRECTION.
- It is the purchaser's responsibility to verify that all applicable taxes are being charged in accordance with federal and state laws.
- Prices shown on this invoice reflect discounts received for Payment by Cash, Check, or Electronic Funds Transfer (EFT). Payment by other means is subject to a 3% surcharge.

Appendix E

Excess Emission Reports



Startup/Shutdown Excess Emissions Report

U1 CO Startup/Shutdown



From: 10/01/2023 00:00 To: 12/31/2023 23:59 Facility Name: Malburg Generating Station

Generated: 01/16/2024 10:25 Location: Vernon, California

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

Total Operating Time: 559.17 Hours
Non-Operating Time: 1,648.83 Hours Report Time: 2,208.00 Hours

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

No excess emissions were found in the reporting period.

Startup/Shutdown Excess Emissions Report



U1 CO Startup/Shutdown

From: 10/01/2023 00:00 **To:** 12/31/2023 23:59 **Facility Name:** Malburg Generating Station
Generated: 01/16/2024 10:25 **Location:** Vernon, California
Tag Name: U1_CO_LbPerHr_1M SI = SampleInvalid, * = Excess Emission

Total Operating Time: 559.17 Hours
Non-Operating Time: 1,648.83 Hours Report Time: 2,208.00 Hours

--

No invalid events were found in the reporting period.

Startup/Shutdown Excess Emissions Report



U1 NOx Startup/Shutdown

From: 10/01/2023 00:00 **To:** 12/31/2023 23:59 **Facility Name:** Malburg Generating Station
Generated: 01/16/2024 10:26 **Location:** Vernon, California
Tag Name: U1_NOxRECLM_LbPerHr_1M SI = SampleInvalid, * = Excess Emission
Total Operating Time: 559.17 Hours
Non-Operating Time: 1,648.83 Hours Report Time: 2,208.00 Hours

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

No excess emissions were found in the reporting period.

Startup/Shutdown Excess Emissions Report



U1 NOx Startup/Shutdown

From: 10/01/2023 00:00 **To:** 12/31/2023 23:59 **Facility Name:** Malburg Generating Station
Generated: 01/16/2024 10:26 **Location:** Vernon, California
Tag Name: U1_NOxRECLM_LbPerHr_1M SI = SampleInvalid, * = Excess Emission
Total Operating Time: 559.17 Hours
Non-Operating Time: 1,648.83 Hours Report Time: 2,208.00 Hours

--

No invalid events were found in the reporting period.

Startup/Shutdown Excess Emissions Report

U1 VOC Startup/Shutdown



From: 10/01/2023 00:00 To: 12/31/2023 23:59 Facility Name: Malburg Generating Station

Generated: 01/16/2024 10:27 Location: Vernon, California

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

Total Operating Time: 559.17 Hours
Non-Operating Time: 1,648.83 Hours Report Time: 2,208.00 Hours

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

No excess emissions were found in the reporting period.

Startup/Shutdown Excess Emissions Report



U1 VOC Startup/Shutdown

From: 10/01/2023 00:00 **To:** 12/31/2023 23:59 **Facility Name:** Malburg Generating Station

Generated: 01/16/2024 10:27 **Location:** Vernon, California

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

Total Operating Time: 559.17 Hours
Non-Operating Time: 1,648.83 Hours Report Time: 2,208.00 Hours

--

No invalid events were found in the reporting period.

Excess Emission Report



Unit 1 - CO ppmvdc 1-hour during Normal Operation

From: 10/01/2023 00:00 To: 12/31/2023 23:59 Facility Name: Malburg Generating Station
Generated: 01/16/2024 10:28 Location: Vernon, California

Tag Name: U1_CONormal_Ppmvdc_1H
Total Operating Time: 562.00 Hour(s) No Exclusions Allowed
Non-Operating Time: 1,646.00 Hour(s) Report Time: 2,208.00 Hour(s)

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

Total Operating Time:	562.00 Hour(s)
Total Duration (Online only):	0.00 Hour(s)
Time in exceedance as a percentage of operating time:	0.00 %
Time in compliance as a percentage of operating time:	100.00 %

Excess Emission Report



Unit 1 - NOx ppmvdc 1-hour during Normal Operation

From: 10/01/2023 00:00 To: 12/31/2023 23:59 Facility Name: Malburg Generating Station
Generated: 01/16/2024 10:28 Location: Vernon, California

Tag Name: U1_NOxNormal_Ppmvdc_1H

Total Operating Time: 562.00 Hour(s) No Exclusions Allowed

Non-Operating Time: 1,646.00 Hour(s) Report Time: 2,208.00 Hour(s)

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

Total Operating Time:	562.00 Hour(s)
Total Duration (Online only):	0.00 Hour(s)
Time in exceedance as a percentage of operating time:	0.00 %
Time in compliance as a percentage of operating time:	100.00 %

Excess Emission Report

Unit 1 - VOC ppmvdc 1-hour during Normal Operation

From: 10/01/2023 00:00 To: 12/31/2023 23:59 Facility Name: Malburg Generating Station
Generated: 01/16/2024 10:29 Location: Vernon, California



Tag Name: U1_VOCNormal_Ppmvdc_1H
Total Operating Time: 562.00 Hour(s) No Exclusions Allowed
Non-Operating Time: 1,646.00 Hour(s) Report Time: 2,208.00 Hour(s)

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

Total Operating Time:	562.00 Hour(s)
Total Duration (Online only):	0.00 Hour(s)
Time in exceedance as a percentage of operating time:	0.00 %
Time in compliance as a percentage of operating time:	100.00 %

Excess Emission Report

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

From: 10/01/2023 00:00 To: 12/31/2023 23:59 Facility Name: Malburg Generating Station
Generated: 01/16/2024 10:30 Location: Vernon, California



Tag Name: U1_CO_3HrRoll_Ppmvdc_1H
Total Operating Time: 562.00 Hour(s) No Exclusions Allowed
Non-Operating Time: 1,646.00 Hour(s) Report Time: 2,208.00 Hour(s)

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

Total Operating Time:	562.00 Hour(s)
Total Duration (Online only):	0.00 Hour(s)
Time in exceedance as a percentage of operating time:	0.00 %
Time in compliance as a percentage of operating time:	100.00 %

Quad K Excess Emissions Report

U1 NOX 4-Hour Events

From: 10/01/2023 00:00 To: 12/31/2023 23:59 Facility Name: Malburg Generating Station
Generated: 01/16/2024 10:30 Location: Vernon, California



Tag Name: U1_NOx4H_Ppmvdc_1H
Total Operating Time: 562.00 Hour(s) No Exclusions Allowed
Non-Operating Time: 1,646.00 Hour(s) Report Time: 2,208.00 Hour(s)

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

Total Operating Time:	562.00 Hour(s)
Total Duration (Online only):	0.00 Hour(s)
Time in exceedance as a percentage of operating time:	0.00 %
Time in compliance as a percentage of operating time:	100.00 %

Startup/Shutdown Event Report

U2 CO Startup/Shutdown Events



From: 10/01/2023 00:00 To: 12/31/2023 23:59 Facility Name: Malburg Generating Station

Generated: 01/16/2024 10:31 Location: Vernon, California

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

Total Operating Time: 955.02 Hours
Non-Operating Time: 1,252.98 Hours Report Time: 2,208.00 Hours

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

No excess emissions were found in the reporting period.

Startup/Shutdown Event Report

U2 CO Startup/Shutdown Events



From: 10/01/2023 00:00 **To:** 12/31/2023 23:59 **Facility Name:** Malburg Generating Station

Generated: 01/16/2024 10:31 **Location:** Vernon, California

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

Total Operating Time: 955.02 Hours
Non-Operating Time: 1,252.98 Hours Report Time: 2,208.00 Hours

--

No invalid events were found in the reporting period.

Startup/Shutdown Excess Emissions Report

U2 NOx Startup/Shutdown



From: 10/01/2023 00:00 To: 12/31/2023 23:59 Facility Name: Malburg Generating Station

Generated: 01/16/2024 10:31 Location: Vernon, California

Tag Name: U2_NOXRECLM_LbPerHr_1M SI = SampleInvalid, * = Excess Emission

Total Operating Time: 955.02 Hours
Non-Operating Time: 1,252.98 Hours Report Time: 2,208.00 Hours

Unit Operation					
----------------	--	--	--	--	--

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

No excess emissions were found in the reporting period.

Startup/Shutdown Excess Emissions Report



U2 NOx Startup/Shutdown

From: 10/01/2023 00:00 **To:** 12/31/2023 23:59 **Facility Name:** Malburg Generating Station

Generated: 01/16/2024 10:31 **Location:** Vernon, California

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

Total Operating Time: 955.02 Hours
Non-Operating Time: 1,252.98 Hours Report Time: 2,208.00 Hours

--

No invalid events were found in the reporting period.

Startup/Shutdown Event Report

U2 VOC Startup/Shutdown Events



From: 10/01/2023 00:00 To: 12/31/2023 23:59 Facility Name: Malburg Generating Station

Generated: 01/16/2024 10:32 Location: Vernon, California

Tag Name: U2_VOC_LbPerHr_1M SI = SampleInvalid, * = Excess Emission

Total Operating Time: 955.02 Hours
Non-Operating Time: 1,252.98 Hours Report Time: 2,208.00 Hours

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

No excess emissions were found in the reporting period.

Startup/Shutdown Event Report

U2 VOC Startup/Shutdown Events



From: 10/01/2023 00:00 **To:** 12/31/2023 23:59 **Facility Name:** Malburg Generating Station

Generated: 01/16/2024 10:32 **Location:** Vernon, California

Tag Name: U2_VOC_LbPerHr_1M SI = SampleInvalid, * = Excess Emission

Total Operating Time: 955.02 Hours
Non-Operating Time: 1,252.98 Hours Report Time: 2,208.00 Hours

--

No invalid events were found in the reporting period.

Excess Emission Report

Unit 2 - CO ppmvdc 1-hour during Normal Operation

From: 10/01/2023 00:00 To: 12/31/2023 23:59 Facility Name: Malburg Generating Station
Generated: 01/16/2024 10:33 Location: Vernon, California



Tag Name: U2_CONormal_Ppmvdc_1H
Total Operating Time: 958.00 Hour(s) No Exclusions Allowed
Non-Operating Time: 1,250.00 Hour(s) Report Time: 2,208.00 Hour(s)

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

Total Operating Time:	958.00 Hour(s)
Total Duration (Online only):	0.00 Hour(s)
Time in exceedance as a percentage of operating time:	0.00 %
Time in compliance as a percentage of operating time:	100.00 %

Excess Emission Report

Unit 2 - NOx ppmvdc 1-hour during Normal Operation

From: 10/01/2023 00:00 To: 12/31/2023 23:59 Facility Name: Malburg Generating Station
Generated: 01/16/2024 11:11 Location: Vernon, California



Tag Name: U2_NOxNormal_Ppmvdc_1H
Total Operating Time: 958.00 Hour(s) No Exclusions Allowed
Non-Operating Time: 1,250.00 Hour(s) Report Time: 2,208.00 Hour(s)

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

Total Operating Time:	958.00 Hour(s)
Total Duration (Online only):	0.00 Hour(s)
Time in exceedance as a percentage of operating time:	0.00 %
Time in compliance as a percentage of operating time:	100.00 %

Excess Emission Report

Unit 2 - VOC ppmvdc 1-hour during Normal Operation

From: 10/01/2023 00:00 To: 12/31/2023 23:59 Facility Name: Malburg Generating Station
Generated: 01/16/2024 11:12 Location: Vernon, California



Tag Name: U2_VOCNormal_Ppmvdc_1H
Total Operating Time: 958.00 Hour(s) No Exclusions Allowed
Non-Operating Time: 1,250.00 Hour(s) Report Time: 2,208.00 Hour(s)

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

Total Operating Time:	958.00 Hour(s)
Total Duration (Online only):	0.00 Hour(s)
Time in exceedance as a percentage of operating time:	0.00 %
Time in compliance as a percentage of operating time:	100.00 %

Excess Emission Report

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

From: 10/01/2023 00:00 To: 12/31/2023 23:59 Facility Name: Malburg Generating Station
Generated: 01/16/2024 11:12 Location: Vernon, California



Tag Name: U2_CO_3HrRoll_Ppmvdc_1H
Total Operating Time: 958.00 Hour(s) No Exclusions Allowed
Non-Operating Time: 1,250.00 Hour(s) Report Time: 2,208.00 Hour(s)

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

Total Operating Time:	958.00 Hour(s)
Total Duration (Online only):	0.00 Hour(s)
Time in exceedance as a percentage of operating time:	0.00 %
Time in compliance as a percentage of operating time:	100.00 %

Quad K Excess Emissions Report

U2 NOX 4-Hour Events

From: 10/01/2023 00:00

To: 12/31/2023 23:59

Generated: 01/16/2024 11:13

Facility Name: Malburg Generating Station

Location: Vernon, California



Tag Name: U2_NOx4H_Ppmvdc_1H

Total Operating Time: 958.00 Hour(s)

Non-Operating Time: 1,250.00 Hour(s) Report Time: 2,208.00 Hour(s)

No Exclusions Allowed

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

Total Operating Time:	958.00 Hour(s)
Total Duration (Online only):	0.00 Hour(s)
Time in exceedance as a percentage of operating time:	0.00 %
Time in compliance as a percentage of operating time:	100.00 %

Appendix F

MGS RECLAIM Annual Emission Allocation Information





FACILITY PERMIT TO OPERATE VERNON PUBLIC UTILITIES

SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

The annual allocation of NO_x RECLAIM Trading Credits (RTCs) for this facility is calculated pursuant to Rule 2002. Total NO_x emission shall not exceed such annual allocations unless the operator obtains RTCs corresponding to the facility's increased emissions in compliance with Rules 2005 and 2007.

The level of Starting Allocation plus Non-Tradable Credits used to determine compliance with Rule 2005(c)(4) and applicability of Rule 2005(e) - Trading Zone Restrictions is listed on the last page of this Section.

The following table lists the annual allocations that were issued to this facility and the amounts of RTCs held by this facility on the day of printing this Section.

RECLAIM POLLUTANT ANNUAL ALLOCATION (POUNDS)

Year Begin End (month/year)	Zone	NO _x RTC Initially Allocated	NO _x RTC ¹ Holding as of 07/01/2023 (pounds)	Non-Tradable ² Non-Usable RTCs (pounds)
1/2021 12/2021	Coastal	0	16817	0
7/2021 6/2022	Coastal	28480	6430	0
1/2022 12/2022	Coastal	0	28312	0
7/2022 6/2023	Coastal	28480	17412	0
1/2023 12/2023	Coastal	0	17413	0
7/2023 6/2024	Coastal	28480	17413	0
1/2023 12/2023	Inland	0	10367	0
1/2024 12/2024	Coastal	0	15663	0
7/2024 6/2025	Coastal	28480	15663	0
1/2025 12/2025	Coastal	0	15663	0
7/2025 6/2026	Coastal	28480	15663	0
1/2026 12/2026	Coastal	0	15663	0
7/2026 6/2027	Coastal	28480	15663	0
1/2027 12/2027	Coastal	0	15663	0
7/2027 6/2028	Coastal	28480	15663	0
1/2028 12/2028	Coastal	0	15663	0
7/2028 6/2029	Coastal	28480	15663	0

Footnotes:

1. This number may change due to pending trades, emissions reported under Quarterly Certification of Emissions Report (QCER) and Annual Permit Emission Program (APEP) Report required pursuant to Rule 2004, or deductions made pursuant to Rule 2010(b). The most recent total RTC information can be obtained from the District's RTC Listing.
2. The use of such credits is subject to restrictions set forth in paragraph (f)(1) of Rule 2002.



FACILITY PERMIT TO OPERATE VERNON PUBLIC UTILITIES

SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

The annual allocation of NO_x RECLAIM Trading Credits (RTCs) for this facility is calculated pursuant to Rule 2002. Total NO_x emission shall not exceed such annual allocations unless the operator obtains RTCs corresponding to the facility's increased emissions in compliance with Rules 2005 and 2007.

The level of Starting Allocation plus Non-Tradable Credits used to determine compliance with Rule 2005(c)(4) and applicability of Rule 2005(e) - Trading Zone Restrictions is listed on the last page of this Section.

The following table lists the annual allocations that were issued to this facility and the amounts of RTCs held by this facility on the day of printing this Section.

RECLAIM POLLUTANT ANNUAL ALLOCATION (POUNDS)

Year Begin End (month/year)	Zone	NO _x RTC Initially Allocated	NO _x RTC ¹ Holding as of 07/01/2023 (pounds)	Non-Tradable ² Non-Usable RTCs (pounds)
1/2029 12/2029	Coastal	0	15663	0
7/2029 6/2030	Coastal	28480	15663	0
1/2030 12/2030	Coastal	0	15663	0
7/2030 6/2031	Coastal	28480	15663	0
1/2031 12/2031	Coastal	0	15663	0
7/2031 6/2032	Coastal	28480	15663	0
1/2032 12/2032	Coastal	0	15663	0
7/2032 6/2033	Coastal	28480	15663	0
1/2033 12/2033	Coastal	0	15663	0
7/2033 6/2034	Coastal	28480	15663	0
1/2034 12/2034	Coastal	0	15663	0
7/2034 6/2035	Coastal	28480	15663	0
1/2035 12/2035	Coastal	0	15663	0
7/2035 6/2036	Coastal	28480	15663	0
1/2036 12/2036	Coastal	0	15663	0
7/2036 6/2037	Coastal	28480	15663	0
1/2037 12/2037	Coastal	0	15663	0

Footnotes:

1. This number may change due to pending trades, emissions reported under Quarterly Certification of Emissions Report (QCER) and Annual Permit Emission Program (APEP) Report required pursuant to Rule 2004, or deductions made pursuant to Rule 2010(b). The most recent total RTC information can be obtained from the District's RTC Listing.
2. The use of such credits is subject to restrictions set forth in paragraph (f)(1) of Rule 2002.



FACILITY PERMIT TO OPERATE VERNON PUBLIC UTILITIES

SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

The annual allocation of NO_x RECLAIM Trading Credits (RTCs) for this facility is calculated pursuant to Rule 2002. Total NO_x emission shall not exceed such annual allocations unless the operator obtains RTCs corresponding to the facility's increased emissions in compliance with Rules 2005 and 2007.

The level of Starting Allocation plus Non-Tradable Credits used to determine compliance with Rule 2005(c)(4) and applicability of Rule 2005(e) - Trading Zone Restrictions is listed on the last page of this Section.

The following table lists the annual allocations that were issued to this facility and the amounts of RTCs held by this facility on the day of printing this Section.

RECLAIM POLLUTANT ANNUAL ALLOCATION (POUNDS)

Year Begin End (month/year)	Zone	NO _x RTC Initially Allocated	NO _x RTC ¹ Holding as of 07/01/2023 (pounds)	Non-Tradable ² Non-Usable RTCs (pounds)
7/2037 6/2038	Coastal	28480	15663	0
1/2038 12/2038	Coastal	0	15663	0

Footnotes:

1. This number may change due to pending trades, emissions reported under Quarterly Certification of Emissions Report (QCER) and Annual Permit Emission Program (APEP) Report required pursuant to Rule 2004, or deductions made pursuant to Rule 2010(b). The most recent total RTC information can be obtained from the District's RTC Listing.
2. The use of such credits is subject to restrictions set forth in paragraph (f)(1) of Rule 2002.



FACILITY PERMIT TO OPERATE VERNON PUBLIC UTILITIES

SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

The annual allocation of RECLAIM Trading Credits (RTCs) for this facility is calculated pursuant to Rule 2002. If the facility submits a permit application to increase in an annual allocation to a level greater than the facility's starting Allocation plus Non-Tradable credits as listed below, the application will be evaluated for compliance with Rule 2005 (c)(4). Rule 2005 (e) - Trading Zone Restrictions applies if an annual allocation is increased to a level greater than the facility's Starting Allocation plus Non-Tradable Credits:

Year		Zone	NOx RTC	Non-Tradable
Begin	End		Starting Allocation	Credits(NTC)
(month/year)			(pounds)	(pounds)
7/1994	6/1995	Coastal	296280	7720