

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



January 17, 2020

Advice Letter 5724-E

Erik Jacobson
Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

**SUBJECT: Information-Only Advice Letter Regarding Air Pollution Control
Information on Tree Mortality Contracts in Compliance with Decision
(D.) 18-12-003**

Dear Mr. Jacobson:

Advice Letter 5724-E is effective as of December 20, 2019.

Sincerely,

A handwritten signature in cursive script that reads 'Edward Randolph'.

Edward Randolph
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division

December 20, 2019

Advice 5724-E

(Pacific Gas and Electric Company – U 39 E)

Public Utilities Commission of the State of California

**Subject: Information-Only Advice Letter Regarding Air Pollution Control
Information on Tree Mortality Contracts in Compliance with Decision
(D.) 18-12-003**

Purpose

In compliance with Decision (D.) 18-12-003 (the Decision), issued on December 21, 2018, Pacific Gas and Electric Company (PG&E) respectfully submits this information-only advice letter providing data on the Tree Mortality (TM)¹ facilities' compliance with air pollution control requirements, beginning from the latest available period for each respective TM contract.

Background

In Ordering Paragraph (OP) 6 of the Decision, the California Public Utilities Commission (Commission or CPUC) requires PG&E to collect air pollution control information on the TM facilities and to send an information-only advice letter to the Commission's Energy Division every six months, confirming whether the TM facilities under contract with PG&E have complied with their applicable air pollution control requirements over the previous six months, beginning six months after the date of the decision being issued.² If the TM facilities do not comply with their air pollution control requirements, OP 6 requires that PG&E explain the circumstances of the non-compliance, the steps taken by the TM facility operator to rectify the non-compliance, and if the non-compliance is ongoing the expected resolution of the non-compliance. Furthermore, OP 6 of the Decision requires that each advice letter state whether any of PG&E's TM contracts are with facilities operating in federal severe or extreme nonattainment areas for particulate matter or ozone.

¹ Tree Mortality contracts are those entered into pursuant to Resolutions E-4770 and E-4805.

² D.18-12-003 was issued on December 21, 2018. Six months from this date falls on June 21, 2019. Six months from June 21, 2019 falls on December 21, 2019.

Air Pollution Control Information Reporting

In compliance with the Decision, PG&E hereby submits the air pollution control information provided by each TM facility, included as each of the attachments listed below. PG&E is submitting attestations provided by each TM facility regarding compliance with the facility's applicable air pollution requirements, included as Attachment 1 and Attachment 3. The compliance certification reports provided by each TM facility have also been included as Attachment 2 and Attachment 4. These attachments explain the circumstances of any non-compliance or other deviations from air permit requirements during the applicable periods and the steps taken by the TM facility operator to rectify the non-compliance.

Additionally, the TM contracts under contract with PG&E do not operate in federal severe or extreme nonattainment areas for particulate matter or ozone.

Attachments

Attachment 1: Wheelabrator Shasta Air Quality Attestation
Attachment 2: Wheelabrator Shasta Compliance Certification Reports
Attachment 3: Burney Forest Products Air Quality Attestation
Attachment 4: Burney Forest Products Compliance Certification Reports

Protests

This is an information-only advice letter submittal.³ Pursuant to General Order 96-B Section 6.2, PG&E is not seeking relief through this advice letter and is not subject to protest.

Effective Date

PG&E requests that this information-only advice letter become effective upon date of submittal, which is December 20, 2019.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for A.16-11-005. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

³ See D.18-12-003 (OP 6) (specifying that the Advice Letter shall be information-only).



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Pacific Gas and Electric Company (ID U39E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Kimberly Loo

Phone #: (415)973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: KELM@pge.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
 PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 5724-E

Tier Designation: Information Only

Subject of AL: Information-Only Advice Letter Regarding Air Pollution Control Information on Tree Mortality Contracts in Compliance with Decision (D.) 18-12-003

Keywords (choose from CPUC listing): Compliance

AL Type: Monthly Quarterly Annual One-Time Other: Every 6 months

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.18-12-003

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date: 12/20/19

No. of tariff sheets: 0

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: N/A

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Erik Jacobson, c/o Megan Lawson
Title: Director, Regulatory Relations
Utility Name: Pacific Gas and Electric Company
Address: 77 Beale Street, Mail Code B13U
City: San Francisco, CA 94177
State: California Zip: 94177
Telephone (xxx) xxx-xxxx: (415)973-2093
Facsimile (xxx) xxx-xxxx: (415)973-3582
Email: PGETariffs@pge.com

Name:
Title:
Utility Name:
Address:
City:
State: District of Columbia Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

PACIFIC GAS AND ELECTRIC COMPANY

ATTACHMENT 1

**Wheelabrator Shasta
Air Quality Attestation**



**APPENDIX C
AIR QUALITY ATTESTATION**

[VIA ELECTRONIC SUBMISSION]

December 03, 2019

PG&E

*Attn: Energy Contract Management & Settlements
77 Beale Street, Mail Code NI2E
San Francisco, CA 94105, 94105-1702*

Subject: Bioenergy Renewable Auction Mechanism Power Purchase Agreement ("BioRAM PPA") by and between PG&E ("Buyer") and *Wheelabrator Shasta Energy Company Inc*, a Delaware corporation ("Seller") – Seller's Air Quality Attestation

Dear Sir or Madam:

Seller attests that the Project ***was not*** in compliance with all applicable air pollution and control requirements for the period beginning ***June 15, 2019*** and ending ***November 22, 2019***. Seller hereby represents and warrants that:

1. This Air Quality Attestation *is* submitted in compliance to PG&E's request dated November 20, 2019.
2. Seller ***was not*** in compliance with all applicable air pollution and control requirements for the period.
3. List of non-compliance: ***Deviation to one Title V permit condition occurred during the 2nd half of 2019 as detailed in the 2019 Deviation Report Forms. The deviation was a single late report, by about 30 minutes beyond the required four hour reporting requirement, of an excess emission event that occurred during a shutdown.***

Compliance with the Project's applicable air quality and control requirements is documented in the attached Air Pollution Report. Buyer may request additional information to accommodate reporting and demonstrate Seller's compliance with air pollution and control requirements.

Capitalized terms used but not otherwise defined in this letter have the meanings set forth in the BioRAM PPA. The authorized signature from the Seller certifies that Seller has the knowledge and authority to attest that the information on this form is true and correct.

Seller	Wheelabrator Shasta Energy Company Inc.
Print Name	Reg Goldie
Signature	
Title	VP, Energy Marketing and Sales
Date	December 3, 2019

PACIFIC GAS AND ELECTRIC COMPANY

ATTACHMENT 2

**Wheelabrator Shasta
Compliance Certification Reports**

Facility Name: Wheelabrator Shasta Energy Company
Reporting Period: June 15 to November 22, 2019
Facility Permit Number: 86-VP-08h

Report Due Date: December 5, 2020
Submittal Type: Monitoring Report (District Rule 5.VI.B.7)
 Compliance Schedule Progress Report
 Compliance Certification (District Rule 5.VI.B.14)

1. Facility Information

Company Name: Wheelabrator Shasta Energy Company
Facility Name: Wheelabrator Shasta Energy Company
Nature of Business: Power Generation

Mailing Address: 20811 Industry Road
Anderson, CA 96007
Street Address: Same as Mailing Address

2. See attached Applicable Requirements Tables, and associated attachments for required reporting information. Terms used in the table are defined below.

An **excursion** is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

An **exceedance** is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

3. CERTIFICATION

Statement of Certification:

I certify based on information and belief formed after reasonable inquiry, the statement and information in this document and attachments are true, accurate, and complete.

Bryan Booth
Name of Responsible Official Certifying Compliance

Plant Manager, Wheelabrator Shasta Energy Company
Title of Responsible Official and Company Name


Signature of Responsible Official

11/25/19
Date

Annual Compliance Certifications (District Rule 5.VI.B.14) must also be submitted to:

U.S. EPA Region IX
Air Division (AIR-3)
75 Hawthorne Street
San Francisco, CA 94105-3901

Facility Name: Wheelabrator Shasta Energy Company
 Reporting Period: June 15 to November 22, 2019
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Report Due Date: December 5, 2020
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APPLICABLE REQUIREMENTS TABLE							
Permit(s) & Condition(s)	Compliance Determination Method (frequency, test method, etc...)	Currently in Compliance?	Compliance Determination Method	During the Reporting Period (If yes to any question, attach Form 5-L)			Source Testing Required by Permit? (If yes, attach Form 5-K2 or summary)
				Any Excursions?	Any Exceedances?	Other Information Indicating Non-Compliance?	
86-VP-08h Condition 1	Standard Emission Limits - Compliance with other permit terms, along with equipment design, assures compliance with these general limits.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 2	Photochemically Reactive Solvents - Use low VOC solvent in the plant's parts washer.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 3	Stack Opacity Limits – Maintain Continuous Opacity Monitors (COMS) and computer to calculate 6-minute block averages. Maintain at least one Visible Emissions Evaluator at the site and perform daily stack readings using Method 9.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 4	BACT - Maintain BACT at the facility, review excess emissions to verify that BACT systems were operating.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Facility Name: Wheelabrator Shasta Energy Company
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				Any Excursions?	Any Exceedances?	Other Information Indicating Non-Compliance?	
86-VP-08h Condition 5a (District-only requirement)	Particulate Limits - Conduct Annual Stack Testing for Particulate using EPA Method 5 and ARB Method 5	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
86-VP-08h Condition 5b (District-only requirement)	NMHC Limits - Conduct VOC testing according to EPA Method 18/25A at the frequency specified in Condition 28.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
86-VP-08h Condition 5c (District-only requirement)	SOx Limits - Conduct Annual Stack Testing using ARB Method 100 while burning railroad ties at a rate according to Condition 25. Sample ties and hog fuel during testing and analyze for sulfur content. Collect a monthly composite sample of railroad ties and analyze for sulfur content. Verify the amount of ties burned during the month and calculate the tons of SO2. Summarize in the monthly report submitted to the District.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

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				Any Excursions?	Any Exceedances?	Other Information Indicating Non-Compliance?	
86-VP-08h Condition 5d (District-only requirement)	NOx and Ammonia Limits - Maintain Continuous Emissions Monitoring System (CEMS) for NOx. Conduct Annual Stack Test for Ammonia.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
86-VP-08h Condition 5e (District-only requirement)	CO Limits - Conduct Annual Compliance Testing using ARB Method 100 and maintain Continuous Emission Monitoring System for CO.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
86-VP-08h Condition 6 (District-only requirement)	Fugitive Emissions Control - Maintain dust control systems, high wind speed actions, ash handling, housekeeping and work practices.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 7	Emission Offsets - Maintain a database of fuel purchased for the facility, tracking fuel purchases from within the Sacramento River Air Basin of fuel that would otherwise have been open burned. Calculate offsets on an annual basis using ARB Manual of Procedures (MOP).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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				Any Excursions?	Any Exceedances?	Other Information Indicating Non-Compliance?	
86-VP-08h Condition 8	Emission Offsets – Obtain appropriate offsets that meet requirements and submit report to AQMD.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 9	Excess Emissions – Take immediate action on excess emissions. Conduct Annual Stack Testing and maintain Continuous Emissions Monitoring System.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 10	Halogenated Solvent Degreaser - Obtain AQMD approval prior to using halogenated solvent in the cold cleaning solvent degreaser.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 11	Fuel Sources - Maintain fuel database, track fuel sources for the facility and implement fuel quality control procedures. Prior to using fuels listed in Condition 11.h, fuel must be determined to qualify as a non-hazardous secondary material.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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				Any Excursions?	Any Exceedances?	Other Information Indicating Non-Compliance?	
86-VP-08h Condition 12	Fuel Process Rates - Maintain fuel database tracking fuel sources for the facility. Maintain facility capacity factor and submit to the District in the monthly report.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 13 (District-only requirement)	Fuel Supplier Agreements – Include stipulation that fuel suppliers obtain and maintain required licenses, permits and other governmental approvals. Maintain records of fuel supplier fuel agreements.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 14	Standards for Performance for CISWI, If Applicable – Maintain fuel database tracking fuel sources for the facility, demonstrating that solid waste, as determined in 40 CFR 241, are not used as fuel.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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				Any Excursions?	Any Exceedances?	Other Information Indicating Non-Compliance?	
86-VP-08h Condition 15	Air Pollution Control Equipment - Maintain facility such that the Air Pollution Control equipment is in service while combustion process is occurring.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 16	CEMS - Maintain the Continuous Emissions Monitoring System (CEMS) and Data Acquisition System (DAS). Review emissions data monthly and summarize monitor downtime in the monthly report.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 17	Fuel Turnover – Maintain fuel turnover to less than 180 days. Compliance is demonstrated by following the Fuel Management Plan (Condition 54).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 19	Steam Limits - Maintain the DAS and fuel use database.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 20	Water Treatment Chemicals – Ensure no chrome-based water treatment chemicals are used.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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				Any Excursions?	Any Exceedances?	Other Information Indicating Non-Compliance?	
86-VP-08h Condition 21a - 21f	Combustion and Control Parameters - Maintain the Bailey/NT Boiler Control system for conditions 21b through 21f. Maintain DAS and fuel use database for Condition 21a.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 21g	Sulfur in Fuels - Sample railroad ties on a monthly basis. [NOTE: No RR Ties used during this reporting period.]	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 22	Emission Reports - Submit a monthly report containing the required information to the District by the first day of the following month.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 23 (District-only requirement)	Deodorizer Use Records – Maintain monthly deodorizer use records along with calendar year totals.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 24	Emission Test Methods – Use only stipulated test methods unless approved in advance.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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				Any Excursions?	Any Exceedances?	Other Information Indicating Non-Compliance?	
86-VP-08h Condition 25	Annual Source Test – Conduct annual source test for PM and ammonia. Annually test for SOx feeding creosote-treated wood at rates as indicated.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 26	Annual Source Test Process Rate – Conduct annual source test within 90% of full operation in accordance with District Rule 3:26.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 27	Source Test – Use independent vendor; Comply with approved test method procedures.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 28	Source Tests - Perform source tests at the required frequency. Submit test reports to AQMD as required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 29	Excess Emissions - Maintain a log of APCO notifications, Report within 4 hours	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 30	Permit Deviations - Maintain a log of APCO notifications.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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86-VP-08h Condition 31	Semi-Annual Compliance Reports - Submit the semi-annual compliance certification to the District by the required date.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 32	Annual Compliance Reports - Submit annual certification to the District and U.S. EPA.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 33	Emission Limit Demonstration – Verify compliance with standard limits upon request. No request was made.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 34	Visible Emission Observations - Maintain at least one employee currently certified as a Visible Emissions Evaluator. Maintain a log of daily visual stack inspections.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 35	Monitoring and Support Records - Maintain records of maintenance and operation. Maintain CEMS data records.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 36	Emission Increases – Notify AQMD of changes that increase emissions.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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86-VP-08h Condition 37	File of all Measurements & Other Information Required in 40 CFR 60 - Maintain file of all measurements and other information required in 40 CFR 60 including CEMS, performance testing, etc.....	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 38	Compliance Test Notification & Report Submittals - Maintain all APCO correspondence pertaining to notification of emission testing and testing results.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 39	Testing Facilities - Maintain a safe stack sampling location.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 40 (District-only requirement)	Wind Speed and Direction - Maintain a wind speed/direction monitor at the site. Data is recorded on electronic media.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 41	Good Operating Practices - Operate and maintain equipment to minimize emissions.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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86-VP-08h Condition 42	Opacity Monitors Span & Data Acquisition – Maintain properly designed and installed opacity monitors. Maintain COMS data records.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 43	CEMs Data – Maintain CEMs operational and log of AQMD notifications.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 44	Fuels & Capacity Factor – Maintain records of amounts of each fuel used. Maintain a record of monthly rolling annual capacity factor for each boiler.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 45	Risk Management Plan - Maintain Risk Management Plan.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 46	CAM Plan - Maintain ESP monitoring computer and records required by the Compliance Assured Monitoring (CAM) Plan.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 47	ESP Power - Maintain ESP power monitoring system.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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86-VP-08h Condition 48	ESP Power Excursions - Respond to and report as excursions all periods where the power requirement is not met. Maintain power input greater than 22 kw.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 49	Semi-Annual NSPS Excess Emission Report - Submit semi-annual excess emission report to USEPA Region IX.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 50	Semi-Annual NSPS Summary Report - Submit semi-annual summary report.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 51 (District-only requirement)	Fuel Pile Camera & Observations - Use cameras to observe fuel piles. Keep records of observations and keep recordings for 6 months.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 52 (District-only requirement)	Fuel Pile Dimensions - Conduct quarterly fuel pile surveys.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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86-VP-08h Condition 53 (District-only requirement)	Off-Site Fuel Storage - Report off-site fuel storage to the District in the monthly report.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 54 (District-only requirement)	Fuel Management Plan - Implement the Fuel Management Plan approved by the District. Train operating staff on the plan and keep records.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 56	Title V Conditions – Comply with all conditions of the permit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 62	Information Requests – Supply information to AQMD upon request.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 63	Construction – Obtain authorization as needed for new equipment or changes to emissions sources.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 64	Operating Permit – Obtain permits as needed for new equipment or changes to emissions sources.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 66	Permit – Maintain permits in good condition.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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86-VP-08h Condition 67	Permit Posting – Maintain posted permits in good condition.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 73	Inspections – Permit entry of authorized agency personnel.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 75	Permit Renewal – Submit administratively complete permit renewal application within required timeframe.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 76	Fees – Submit annual fees	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 77	Ozone Depleting Substances – Hire only certified technicians for ODS work.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 78	Ozone Depleting Substances – Hire only certified technicians for ODS work.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 79	Ozone Depleting Substances – Hire only certified technicians for ODS work.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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				Any Excursions?	Any Exceedances?	Other Information Indicating Non-Compliance?	
86-VP-08h Condition 80	Circumvention – Maintain operations so as to not circumvent emission limits.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 82	Maintenance – Maintain equipment in original operating condition.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 84	Equipment Design – Design all equipment to minimize emissions and maintain compliance.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 86	Training – Provide training for operating staff.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 87	New Source Performance Standards – Comply with NSPS standards.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 89	Subpart ZZZZ Diesel Engine Requirements – Track hours of operation. Ensure maintenance is performed and records are kept as required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 90	Subpart ZZZZ Diesel Engine Records – Maintain maintenance records and records of hours of operation.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Facility Name: Wheelabrator Shasta Energy Company
 Reporting Period: June 15 to November 22, 2019
 Facility Permit Number: 86-VP-08h

Report Due Date: December 5, 2020
 Submittal Type: Monitoring Report (District Rule 5.VI.B.7)
 Compliance Schedule Progress Report
 Compliance Certification (District Rule 5.VI.B.14)

APPLICABLE REQUIREMENTS TABLE							
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				Any Excursions?	Any Exceedances?	Other Information Indicating Non-Compliance?	
86-VP-08h Condition 92	Boiler Tune-Ups – Tune each boiler at the required frequency. Tune-ups are annual unless a continuous oxygen trim system is used.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 93	Energy Assessment – Perform the Energy Assessment. Submit upon request.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 94	Initial Notification of Compliance Status – Submit the initial Compliance Status Report within 60 days of completion of all initial performance tests and other initial compliance demonstrations.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 95	Subpart DDDDD 30-Day Rolling CO Limit - Maintain Continuous Emissions Monitoring System (CEMS) for CO to calculate 30-day rolling averages.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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				Any Excursions?	Any Exceedances?	Other Information Indicating Non-Compliance?	
86-VP-08h Condition 96	Subpart DDDDD Mercury Limit - Conduct performance testing according to Table 5 in 40 CFR Part 63, Subpart DDDDD at the frequency specified in Condition 108 and 112.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
86-VP-08h Condition 97	Subpart DDDDD Hydrochloric Acid Limit - Conduct performance testing according to Table 5 in 40 CFR Part 63, Subpart DDDDD at the frequency specified in Condition 108 and 112.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
86-VP-08h Condition 98	Subpart DDDDD Particulate Limit - Conduct performance testing according to Table 5 in 40 CFR Part 63, Subpart DDDDD at the frequency specified in Condition 108 and 112.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
86-VP-08h Condition 99	Subpart DDDDD Opacity Limit - Maintain Continuous Opacity Monitors (COMS) and computer to calculate daily block averages.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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				Any Excursions?	Any Exceedances?	Other Information Indicating Non-Compliance?	
86-VP-08h Condition 100	Subpart DDDDD Operating Load Limit – Maintain Continuous Monitoring System for steam production and a computer to calculate 30-day rolling averages.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 101	Subpart DDDDD Boiler Emission Averaging – Emission averaging is not done. No plan needed, not using emissions averaging.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 102	Subpart DDDDD Good Operating Practices – Operate and maintain equipment to minimize emissions.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 103	Subpart DDDDD Startup & Shutdown Exemptions – For all startup and shutdown events that are exempted from emission limits in Conditions 95-101. Follow the listed practices.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 104	Subpart DDDDD Affirmative Defense – May be made for malfunctions as per requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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				Any Excursions?	Any Exceedances?	Other Information Indicating Non-Compliance?	
86-VP-08h Condition 105	Subpart DDDDD Data Collection – Collect data in accordance with Table 8 of Subpart DDDDD.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 106	Subpart DDDDD Site Specific Monitoring Plan – Develop and maintain a Site Specific Monitoring Plan. Submit upon request.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 107	Subpart DDDDD Monitoring Systems Operation – Operate the monitoring system as required, maintain records of system operations including results of performance audits, out of control periods, etc... and submit upon request. Include all data, unless otherwise excepted, in assessing compliance.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 108	Subpart DDDDD Initial Performance Test – Perform the initial testing.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 109	Initial Performance Testing Alternative: Fuel Sampling & Analysis – This option was not used.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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				Any Excursions?	Any Exceedances?	Other Information Indicating Non-Compliance?	
86-VP-08h Condition 110	Initial & Annual Performance Evaluations of CO CEMS & COMS – Notify the District of evaluations, perform evaluations initially and annually, and submit the evaluation reports, as required in the permit.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 111	Site Specific Fuel Monitoring Plan, If Required - A fuel monitoring plan is not required at this time, as the plant uses a single fuel (biomass) along with natural gas as supplemental fuel for startup, shutdown, and flame stabilization purposes.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 112	Periodic Performance Testing – Perform testing annually (at least every 12 months), or every 3 rd year (at least every 37 months), if pollutants are less than 75% of the applicable limit for at least two years and there are no changes that could increase emissions.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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				Any Excursions?	Any Exceedances?	Other Information Indicating Non-Compliance?	
86-VP-08h Condition 113	Periodic Performance Testing Alternative: Fuel Sampling & Analysis – This option is not used.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 114	Performance Testing Methods, Notifications, & Submittal of Test Plans – Use the specified methods and submit notifications and test plans as required in the permit.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 115	Performance Test Reports – Submit performance test reports as required in the permit.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 116	New Fuel Requirements – No new fuels used during the reporting period.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 117	Applicability of New 40 CFR 63 Subpart DDDDD Subcategory Due to Fuel Switch / Physical Boiler Change – Submit required notification if applicability changes. No such change this reporting period.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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				Any Excursions?	Any Exceedances?	Other Information Indicating Non-Compliance?	
86-VP-08h Condition 118	Non-Hazardous Secondary Materials, Not Solid Waste – If NHSM have been determined not to be solid waste per 40 CFR 241, keep records of the determination as required in the permit.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 119	40 CFR 63 Subpart DDDDD Semi-Annual Compliance Reports – Submit semi-annual reports.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 120	Maintain 40 CFR 63 Subpart DDDDD Records – Subpart DDDDD records are maintained as required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
86-VP-08h Condition 121	Alternative Output Based Limits & Credit for Energy Conservation Measures – These options are not used.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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List of Conditions Not Requiring Certification (Informational Only)	
Title V Condition No.	
18	Combustion of wet fuel only considered an upset/malfunction condition when slug feeding of fuel wetted by an unusual storm occurrence causes the emission excursions.
55	References to rules, regulations, etc.. in the permit refer to those in place at the time of permit issuance.
57	Title V Permit does not convey property rights.
58	Non-compliance with Title V Permit is grounds for termination, revocation, modification, enforcement, or denial of permit renewal for both the Title V Permit and the Permit to Operate.
59	Permit can be modified, revoked, reopened and reissued, or terminated for cause.
60	Not a defense that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.
61	Pending permit action or notification of anticipated non-compliance does not stay any permit condition.
65	Where an application for or issuance of a permit is pending or in the event of an emergency occurring as a result of an excusable malfunction of a device under permit, AQMD may authorize the operation of the article, machine, equipment, etc... for which a permit is sought for periods of time not to exceed 60 days each for the purpose of testing, experimentation, or obtaining necessary data for a permit or correcting a malfunction.
68	Information that AQMD requires prior to building, erecting, altering, etc... an air emissions source is public record.
69	Air and other pollution monitoring data, including data compiled from facilities are public records.
70	Except as otherwise provided, trade secrets (as described) are not public records.
71	Emission data are public records. Data used to calculate emissions that constitute trade secrets are not public records.

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72	Each and every provision of federal or state law or applicable Air Basin Plan now or hereinafter enacted or as amended that regulates the discharge of any air contaminants is incorporated here by reference. Where such provision conflict with local rules and regulations, the more restrictive provision shall apply.
74	Provisions of the Title V Permit are severable.
81	The Title V Permit is not transferable.
83	If any provision of this permit is found invalid, such finding shall not affect the remaining provisions.
85	The right of entry described in California Health and Safety Code Section 41510, Division 26, shall apply at all times.
88	Regarding emissions trading, no permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes, for changes that are provided for in the permit.
104	Information on affirmative defense provisions of 40 CFR Part 63, Subpart DDDDD.
122	Permit Shield

2019 H2 Title V Certification – Deviations and Test Data

DEVIATION REPORT (FORM 5-L)

SHASTA COUNTY AIR QUALITY MANAGEMENT DISTRICT

DEVIATION INFORMATION

- 1. Permit numbers(s) and condition(s) of emission unit or control unit affected:**
86-VP-08g – Condition 29b
- 2. Description of deviation and methods used to determine compliance status:**
As previously reported, an excess emissions report was not sent within four hours of the occurrence of the event.
- 3. Description and identification of permit condition(s) deviated:**
Condition 29b requires that all excess emissions be reported within four hours.
- 4. Associated equipment and equipment operation (if any):**
All boilers
- 5. Date and time when deviation was discovered:**
The deviation was discovered in the morning on August 10th.
- 6. Date, time and duration of deviation:**
The report was sent about four and a half hours after the event
- 7. Probable cause of deviation:**
The plant operators were focused on improving unstable combustion conditions in the boilers from wet fuel due to extreme rain and bad weather and inadvertently missed the four hour reporting window.
- 8. Preventative or corrective action taken:**
Discussed critical need to meet four hour reporting deadline for such events.

**DEVIATION REPORT
(FORM 5-L)**

SHASTA COUNTY AIR QUALITY MANAGEMENT DISTRICT

DEVIATION INFORMATION

- 1. Permit numbers(s) and condition(s) of emission unit or control unit affected:**
86-VP-08h – Condition 56
- 2. Description of deviation and methods used to determine compliance status:**
As noted elsewhere in the report there were deviations to compliance with some permit conditions.
- 3. Description and identification of permit condition(s) deviated:**
Condition 56 requires compliance with all conditions in the permit.
- 4. Associated equipment and equipment operation (if any):**
See the other Form 5-Ls included in this report.
- 5. Date and time when deviation was discovered:**
See the other Form 5-Ls included in this report.
- 6. Date, time and duration of deviation:**
See the other Form 5-Ls included in this report
- 7. Probable cause of deviation:**
See the other Form 5-Ls included in this report.
- 8. Preventative or corrective action taken:**
See the other Form 5-Ls included in this report.

2019 H2 Title V Certification – Deviations and Test Data

QUANTIFIABLE APPLICABLE REQUIREMENT REPORT (FORM 5-K2)

SHASTA COUNTY AIR QUALITY MANAGEMENT DISTRICT

Emission Unit Description: Boiler 1

Pollutant	Unit of Measure	Measured Emission Rate	Emission Rate Limit	Specific Source Test or Monitoring Record Citation	Date of Test
Carbon Monoxide - CO	ppm @ 3% O ₂	693	1696 Three boiler average	EPA Method 10	6/24/19 and 6/25/19
Carbon Monoxide - CO	lbs/hr	162	793 Total all three boilers	EPA Method 10	6/24/19 and 6/25/19
Ammonia - NH ₃	ppm @ 3% O ₂	19.4	28	SCAQMD 207.1 Modified	6/24/19 and 6/25/19
Oxides of Sulfur - SO ₂	ppm @ 3% O ₂	0.1	24	EPA Method 6C	6/24/19 and 6/25/19
Oxides of Sulfur - SO ₂	lbs/hr	<0.1	45 Total all three boilers	EPA Method 6C	6/24/19 and 6/25/19
Filterable Particulate	gr/dscf @ 3% O ₂	0.0024	0.014	CARB Method 5	6/24/19 and 6/25/19
Total Particulate	lbs/hr	1.1	20	CARB Method 5	6/24/19 and 6/25/19
Nonmethane Hydrocarbons	ppm @ 3% O ₂	18.7	191	EPA Method 25A & EPA Method 18	6/24/19 and 6/25/19
Nonmethane Hydrocarbons	lbs/hr	1.9	89 Total all three boilers	EPA Method 25A & EPA Method 18	6/24/19 and 6/25/19
Mercury – Hg*	lbs/MMBtu	<8.41 E-7	5.76 E-6	EPA Method 29	6/5/18 and 6/6/18
Hydrochloric Acid – HCl*	lbs/MMBtu	<9.65E-5	0.022	EPA Method 26A	6/5/18
Filterable Particulate*	lbs/MMBtu	0.0011	0.037	CARB Method 5	6/5/18 and 6/6/18

*As per Condition 112 of the permit, no testing was conducted for these parameters in 2019 as the results in 2017 and 2018 were both less than 75% of the limit

2019 H2 Title V Certification – Deviations and Test Data

QUANTIFIABLE APPLICABLE REQUIREMENT REPORT (FORM 5-K2)

Emission Unit Description: Boiler 2

Pollutant	Unit of Measure	Measured Emission Rate	Emission Rate Limit	Specific Source Test or Monitoring Record Citation	Date of Test
Carbon Monoxide - CO	ppm @ 3% O ₂	570	1696 Three boiler average	EPA Method 10	6/28/19
Carbon Monoxide - CO	lbs/hr	128	793 Total all three boilers	EPA Method 10	6/28/19
Ammonia - NH ₃	ppm @ 3% O ₂	21.5	28	SCAQMD 207.1 Modified	6/28/19
Oxides of Sulfur - SO ₂	ppm @ 3% O ₂	0	24	EPA Method 6C	6/28/19
Oxides of Sulfur - SO ₂	lbs/hr	0	45 Total all three boilers	EPA Method 6C	6/28/19
Filterable Particulate	gr/dscf @ 3% O ₂	0.0082	0.014	CARB Method 5	6/28/19
Total Particulate	lbs/hr	5.6	20	CARB Method 5	6/28/19
Nonmethane Hydrocarbons	ppm @ 3% O ₂	21.4	191	EPA Method 25A & EPA Method 18	6/28/19
Nonmethane Hydrocarbons	lbs/hr	2.1	89 Total all three boilers	EPA Method 25A & EPA Method 18	6/28/19
Mercury – Hg*	lbs/MMBtu	<8.02 E-7	5.76 E-6	EPA Method 29	6/5/18 and 6/4/18
Hydrochloric Acid – HCl*	lbs/MMBtu	<5.02 E-5	0.022	EPA Method 26A	6/4/18
Filterable Particulate*	lbs/MMBtu	0.0030	0.037	CARB Method 5	6/5/18 and 6/4/18

*As per Condition 112 of the permit, no testing was conducted for these parameters in 2019 as the results in 2017 and 2018 were both less than 75% of the limit

2019 H2 Title V Certification – Deviations and Test Data

QUANTIFIABLE APPLICABLE REQUIREMENT REPORT (FORM 5-K2)

Emission Unit Description: Boiler 3

Pollutant	Unit of Measure	Measured Emission Rate	Emission Rate Limit	Specific Source Test or Monitoring Record Citation	Date of Test
Carbon Monoxide - CO	ppm @ 3% O ₂	504	1696 Three boiler average	EPA Method 10	6/29/19
Carbon Monoxide - CO	lbs/hr	127	793 Total all three boilers	EPA Method 10	6/29/19
Ammonia - NH ₃	ppm @ 3% O ₂	17.5	28	SCAQMD 207.1 Modified	6/29/19
Oxides of Sulfur - SO ₂	ppm @ 3% O ₂	0	24	EPA Method 6C	6/29/19
Oxides of Sulfur - SO ₂	lbs/hr	0	45 Total all three boilers	EPA Method 6C	6/29/19
Filterable Particulate	gr/dscf @ 3% O ₂	0.0035	0.014	CARB Method 5	6/29/19
Total Particulate	lbs/hr	4.2	20	CARB Method 5	6/29/19
Nonmethane Hydrocarbons	ppm @ 3% O ₂	18.4	191	EPA Method 25A & EPA Method 18	6/29/19
Nonmethane Hydrocarbons	lbs/hr	2.0	89 Total all three boilers	EPA Method 25A & EPA Method 18	6/29/19
Mercury – Hg*	lbs/MMBtu	<8.71 E-7	5.76 E-6	EPA Method 29	6/7/18 and 6/6/18
Hydrochloric Acid – HCl*	lbs/MMBtu	<8.4 E-5	0.022	EPA Method 26A	6/6/18
Filterable Particulate*	lbs/MMBtu	0.0011	0.037	CARB Method 5	6/7/18 and 6/6/18

*As per Condition 112 of the permit, no testing was conducted for these parameters in 2019 as the results in 2017 and 2018 were both less than 75% of the limit

PACIFIC GAS AND ELECTRIC COMPANY

ATTACHMENT 3

**Burney Forest Products
Air Quality Attestation**

APPENDIX C
AIR QUALITY ATTESTATION

[VIA ELECTRONIC SUBMISSION]



December 2, 2019

PG&E
Attn: Energy Contract Management & Settlements
77 Beale Street, Mail Code NI2E
San Francisco, CA 94105-1702

Subject: Bioenergy Renewable Auction Mechanism Power Purchase Agreement ("BioRAM PPA") by and between PG&E ("Buyer") and Burney Forest Products, A Joint Venture ("Seller") – Seller's Air Quality Attestation

Dear Sir or Madam:

Seller attests that the Project is in compliance with all applicable air pollution and control requirements for the period beginning May 1, 2019 and ending October 31, 2019. Seller hereby represents and warrants that:

1. This Air Quality Attestation is submitted on or prior to the semiannual air quality attestation due date as specified in Section 3.11.
2. Seller was in compliance with all applicable air pollution and control requirements for the period.
3. List of non-compliance: None

Compliance with the Project's applicable air quality and control requirements is documented in the attached Air Pollution Report. Buyer may request additional information to accommodate reporting and demonstrate Seller's compliance with air pollution and control requirements.

Capitalized terms used but not otherwise defined in this letter have the meanings set forth in the BioRAM PPA. The authorized signature from the Seller certifies that Seller has the knowledge and authority to attest that the information on this form is true and correct.

Seller	Burney Forest Products
Print Name	Kraig Strauch
Signature	
Title	Plant Manager
Date	December 2, 2019

PACIFIC GAS AND ELECTRIC COMPANY

ATTACHMENT 4

**Burney Forest Products
Compliance Certification Reports**



November 19, 2019

Ms. Lindsey Welch
Senior Air Pollution Inspector
Shasta County Air Quality Management District
1855 Placer Street, Suite 101
Redding, CA 96001

**Re: Title V Semi-Annual Monitoring Report and Annual Certification Report
Burney Forest Products
Title V Operating Permit # 87-TV-27m**

Dear Ms. Welch

In accordance with Conditions 24 of the referenced permit, enclosed please find Burney Forest Product's completed annual certification. This submittal covers the time period from October 14, 2018 through October 13, 2019 reporting period and was prepared using the forms specified by the Shasta County Air Quality Management District.

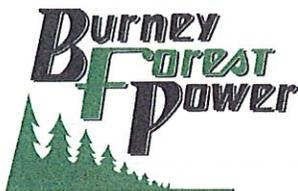
If you have any questions or require additional information, please do not hesitate to contact Joshua Hirschi, EH&S Manager, at 530-335-5023 ext. 105.

Sincerely,

Kraig Strauch,
Plant Manager, Burney Forest Products

Enclosures

cc: John Christian, Olympus (email)
Vince Brisini, Olympus (email)
Michael O'Donnell, Olympus (email)
Kathy Hurst, NAES (email)
File 201-40-09



November 19, 2019

Mr. Matthew Salazar
U.S. EPA Region IX
Air Division (Air-3)
75 Hawthorne Street
San Francisco, CA 94105-3901

Re: Annual Certification Report
Burney Forest Products
Title V Operating Permit # 87-TV-27m

Dear Mr. Salazar:

In accordance with Condition 24 of the referenced permit, enclosed please find Burney Forest Product's annual certification. This submittal covers the time period from October 14, 2018 through October 13, 2019 and was prepared using the forms specified by the Shasta County Air Quality Management District.

If you have any questions or require additional information, please do not hesitate to contact Joshua Hirschi, EH&S Manager, at 530-335-5023.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kraig Strauch".

Kraig Strauch
Plant Manager, Burney Forest Products

Enclosures

cc: Lindsey Welch, SCAQMD
John Christian, Olympus (email)
Vince Brisini, Olympus (email)
Michael O'Donnell, Olympus(email)
Kathy Woodard, NAES (email)

File 201-40-09

CERTIFICATION REPORT (FORM 5-K1)

DISTRICT: Shasta County AQMD	< DISTRICT USE ONLY =
	DISTRICT ID:
COMPANY NAME: Burney Forest Products, a Joint Venture	FACILITY NAME: Burney Forest Power

I. FACILITY INFORMATION

1. Company Name: Burney Forest Products, a Joint Venture
2. Facility Name (if different than Company Name): Burney Forest Power
3. Mailing Address: 35586-B Highway 299 East, Burney, CA 96013
4. Street Address or Source Location: Same as mailing address
5. Facility Permit Number: 87-TV-27m

II. GENERAL INFORMATION

1. Reporting period (specify dates): Oct 14, 2018 through Oct 13, 2019
2. Due date for submittal of report: November 27, 2019

3. Type of submittal: Monitoring Report (complete Section III below)
 Compliance Schedule Progress Report (complete Section IV of Form 5-K2)
 Compliance Certification (complete Section V of Form 5-K2)

III. MONITORING REPORT INFORMATION

1. Were deviations from monitoring requirements encountered during the reporting period?
 No Yes (If Yes, complete Form 5-L)

CERTIFICATION REPORT (FORM 5-K2)

DISTRICT: Shasta County AQMD	< DISTRICT USE ONLY =
	DISTRICT ID:
COMPANY NAME: Burney Forest Products, a Joint Venture	FACILITY NAME: Burney Forest Power

IV. COMPLIANCE SCHEDULE PROGRESS INFORMATION

1. Dates the activities, milestones, or compliance required by schedule of compliance was achieved/will be achieved:

2. Provide explanation of why any dates in schedule of compliance were not/will not be met:

3. Describe in chronological order preventive or corrective action taken:

V. COMPLIANCE CERTIFICATION

1. Was source in compliance during the reporting period specified in Section II of Form 5-K1 and is source currently in compliance with all applicable federal requirements and permit conditions.

Yes No (If no, re-submit Forms 5-I and 5-J)

I certify based on information and belief formed after reasonable inquiry, the statement and information in this document and supplements are true, accurate, and complete.

 11-21-19
Signature of Responsible Official Date

John Christian
Print Name of Responsible Official

Authorized Representative, Burney Forest Products
Title of Responsible Official and Company Name

Telephone Number of Responsible Official: (209) 561 - 6546

DEVIATION REPORT (FORM 5-L)

DISTRICT: Shasta County AQMD	< DISTRICT USE ONLY =
COMPANY NAME: Burney Forest Products, a Joint Venture	DISTRICT ID:
	FACILITY NAME: Burney Forest Power

I. DEVIATION INFORMATION

1. Permit number(s) of emission unit or control unit affected: 87-TV-27m
2. Description of deviation: Submittal of the Annual Fuel Source Verification Report twelve (12) days past the due date.
3. Description and identification of permit condition(s) deviated: Condition 14 - For the purpose of emission offsets, at least ten (10) percent of the fuel utilized for this facility, calculated on an annual basis, shall be pre-commercial thinnings and in-forest slash derived from the Sacramento Valley Air Basin. The facility operator shall submit records which verify this minimum fuel procurement, no later than January 31 of each calendar year.
4. Associated equipment and equipment operation (if any): N/A – Reporting Deviation
5. Date and time when deviation was discovered: February 12, 2019 at approximately 10:00 hours.
6. Date, time and duration of deviation: February 1 through 12, 2019.
7. Probable cause of deviation: The Fuel Source Verification Report was prepared and ready for submittal prior to the due date. However, this single page letter/report got mixed in with the records for the other reports due at the same time. BFP is required to submit a large number of environmental compliance reports in January each year. The letter/report was found unsubmitted when the facility was filing records and information for all the January reports.
8. Preventive or corrective action taken: BFP has a good system for scheduling and tracking environmental compliance requirements. It includes a verification step before the end of each month to verify reports are submitted in time, and a verification step after each month to ensure the records of reports are filed. This particular month was difficult due to staff schedules and the confirmation step was not fully completed.

DEVIATION REPORT (FORM 5-L)

DISTRICT: Shasta County AQMD	< DISTRICT USE ONLY =
	DISTRICT ID:
COMPANY NAME: Burney Forest Products, a Joint Venture	FACILITY NAME: Burney Forest Power

I. DEVIATION INFORMATION

1. Permit number(s) of emission unit or control unit affected: 87-TV-27m
2. Description of deviation: Exceedance of the NOx lb/mmBtu 3-hour block average limit that applies while operating on wood only (0.12 lb/MMBtu).
3. Description and identification of permit condition(s) deviated: Condition 11.d - Wood only limit: 0.12 lbs/MMBtu based on a block-three-hour averaging period. Determination of compliance shall be accomplished by using data obtained from the CEMS and reporting required in Conditions 20 and 24.
4. Associated equipment and equipment operation (if any): Boiler # 2.
5. Date and time when deviation was discovered: February 16, 2019 at approximately 18:00 hours; Reported to the District on February 16, 2019 at 18:47 hours.
6. Date, time and duration of deviation: February 16, 2019 for the 15:00 to 17:59 block hour period.
7. Probable cause of deviation: At around 18:00 hours, the Control Room Operator (CRO) received a DAHS alarm indicating a NOx exceedance. Upon reviewing the boiler controls and systems status, the CRO found that the ammonia injection valve had closed unexpectedly during fairly normal operational transitions. Upon further investigation, BFP determined that there was an anomaly in the ammonia injection programming sequence that led to a malfunction of the ammonia injection system to perform adequately. The control logic was sending the same signal to both the manual-enable and the auto-enable on the valve solenoid blocks during operational transitions; and further the manual-enable had overridden the auto-enable signal. The CRO expected that the ammonia injection valve had reopened automatically (as it should have) during the operational transitions, but found it had failed to reopen only after the 3-hour block period had ended.
8. Preventive or corrective action taken: BFP targeted a few corrective measures to prevent a recurrence. (1) An additional alarm in the DCS to alert the CRO of any hourly average NOx lb/mmBtu emission rate above the 3-hour block average permit limit, which will provide an earlier opportunity to verify operations and make necessary adjustments. (2) An additional alarm or warning to alert the CRO of time periods when steam production rate is at an appropriate level for ammonia injection, but there is no ammonia injection. (3) Modifications to the control logic to send a signal to only the automatic control valve.

Refer to the February Monthly Air Report for more information.

DEVIATION REPORT (FORM 5-L)

DISTRICT: Shasta County AQMD	< DISTRICT USE ONLY =
	DISTRICT ID:
COMPANY NAME: Burney Forest Products, a Joint Venture	FACILITY NAME: Burney Forest Power

I. DEVIATION INFORMATION

1. Permit number(s) of emission unit or control unit affected: 87-TV-27m
2. Description of deviation: Compliance Assurance Monitoring Plan Excursion – ESP Transformer Voltage out of Range
3. Description and identification of permit condition(s) deviated: Condition 43 – The permittee shall respond to and report as excursions all periods where the following conditions (as described in the Compliance Assurance Monitoring Plan) have occurred: a. Primary Transformer Voltage of less than 70 volts AC. b. Secondary (Precipitator) Voltage less than 10.0 KV, (DC). c. Secondary Transformer (Precipitator) Current less than 0.01 MA, (DC).
4. Associated equipment and equipment operation (if any): Boiler # 2 ESP TR-2B.
5. Date and time when deviation was discovered: July 16, 2019 at approximately 02:45 hours; It was reported to the District via email on July 16, 2019 at 15:11 hours.
6. Date, time and duration of deviation: July 16, 2019 approximately 02:45 hours. Duration was approximately 8.25 hours.
7. Probable cause of deviation: On July 15, 2019 at approximately 10:00 hours, both boilers tripped offline due a PG&E line trip. As a result of this trip, the ESP Transformer/Rectifiers shut down. When the boilers were restarted at approximately 18:30 hours the same day, power input (voltage) to Boiler #2, TR-2B could not be reestablished above the minimum voltage requirements for the Primary Transformer and Secondary (Precipitator). The most likely cause is warped plates from introducing cold air during the trip.
8. Preventive or corrective action taken: Boiler #2 was shut down July 16 and the warped plates were repaired.



November 21, 2019

Ms. Lindsey Welch
Senior Air Pollution Inspector
Shasta County Air Quality Management District
1855 Placer Street, Suite 101
Redding, CA 96001

Re: **Monthly Emission Report – Oct 2019**
Burney Forest Products

Dear Ms. Welch,

Pursuant to Title V Operating Permit 87-TV-27m, Condition 20, enclosed please find the October 2019 *Monthly Emissions Report* for Burney Forest Products.

If you have any questions or require additional information, please contact Josh Hirschi, EH&S Manager, at 530-335-5023 ext. 105.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kraig Strauch', with a horizontal line underneath.

Kraig Strauch
Plant Manager

Cc: John Christian (email)
Vince Brisini (email)
Josh Hirschi

File: 201-40-03

BURNEY FOREST PRODUCTS
Monthly Emissions Report
Oct 2019

EXCESS EMISSION SUMMARY			
Parameter	Limit	Averaging Period	Excursions
CO – Gas	400 ppm@3% O2	24-hr Block Avg (Calendar Day)	None
CO - Wood	1,200 ppm@12% CO2	24-hr Block Avg (Calendar Day)	None
NOx – Gas	70 ppm@3% O2	3-hr Block Avg	None
NOx – Gas	0.084 lb/mmBtu	3-hr Block Avg	None
NOx – Wood	0.12 lb/mmBtu	3-hr Block Avg	None
NOx – Mixed Fuel – Boiler 1	0.147 lb/mmBtu	3-hr Block Avg	None
NOx – Mixed Fuel – Boiler 2	0.147 lb/mmBtu	3-hr Block Avg	None
NOx – All Fuels	57.4 lb/hr (both boilers combined)	1-hr Total	None
NOx – All Fuels	250 ppm@12% CO2	1-hr Avg	None
Opacity	20%	6-min Avg	None
Opacity	40%	3-min aggr./hr	None

CEMS/COMS DOWNTIME PERIODS	
NOx	
Boiler 1	On 10/15/19: One (1) hour of downtime to perform preventive maintenance.
Boiler 1	On 10/31/19: One (1) hour of downtime due to PG&E requested shutdown, causing black plant conditions and communications issues.
Boiler 2	On 10/15/19: One (1) hour of downtime to perform preventive maintenance.
CO	
Boiler 1	On 10/15/19: One (1) hour of downtime to perform preventive maintenance.
Boiler 1	On 10/31/19: One (1) hour of downtime due to PG&E requested shutdown, causing black plant conditions and communications issues.
Boiler 2	On 10/15/19: One (1) hour of downtime to perform preventive maintenance.
CO2	
Boiler 1	On 10/15/19: One (1) hour of downtime to perform preventive maintenance.
Boiler 1	On 10/31/19: One (1) hour of downtime due to PG&E requested shutdown, causing black plant conditions and communications issues.
Boiler 2	On 10/15/19: One (1) hour of downtime to perform preventive maintenance.
O2	
Boiler 1	On 10/15/19: One (1) hour of downtime to perform preventive maintenance.

CEMS/COMS DOWNTIME PERIODS	
Boiler 1	On 10/31/19: One (1) hour of downtime due to PG&E requested shutdown, causing black plant conditions and communications issues.
Boiler 2	On 10/15/19: One (1) hour of downtime to perform preventive maintenance.
OPACITY	
Boiler 1	None
Boiler 2	None

OPERATING DATA	
Ammonia Usage (Pounds)	
Boiler 1	47,681
Boiler 2	45,629
Total Both Boilers	93,310
Boiler Operating Time (Hours)	
Boiler 1	734
Boiler 2	737

BOILER OFF LINE TIMES				
Boiler 1				
Boiler Off line		Boiler On line		Cause
Date	Time off	Date	Time on	
10/31/19	13:42	11/02/19	18:59	PG&E Requested Outage – Black Plant
Boiler 2				
Boiler Off line		Boiler On line		Cause
Date	Time off	Date	Time on	
10/31/19	16:42	11/02/19	21:41	PG&E Requested Outage – Black Plant

Note: Boiler Off Line Times are in Pacific time

**PG&E Gas and Electric
Advice Submittal List
General Order 96-B, Section IV**

AT&T	Downey & Brand	Pioneer Community Energy
Albion Power Company	East Bay Community Energy	Praxair
Alcantar & Kahl LLP	Ellison Schneider & Harris LLP	
	Energy Management Service	
Alta Power Group, LLC	Engineers and Scientists of California	Redwood Coast Energy Authority
Anderson & Poole	Evaluation + Strategy for Social Innovation	Regulatory & Cogeneration Service, Inc.
	GenOn Energy, Inc.	SCD Energy Solutions
Atlas ReFuel	Goodin, MacBride, Squeri, Schlotz & Ritchie	
BART	Green Charge Networks	SCE
	Green Power Institute	SDG&E and SoCalGas
Barkovich & Yap, Inc.	Hanna & Morton	
P.C. CalCom Solar	ICF	SPURR
California Cotton Ginners & Growers Assn	International Power Technology	San Francisco Water Power and Sewer
California Energy Commission	Intestate Gas Services, Inc.	Seattle City Light
California Public Utilities Commission	Kelly Group	Sempra Utilities
California State Association of Counties	Ken Bohn Consulting	Southern California Edison Company
Calpine	Keyes & Fox LLP	Southern California Gas Company
	Leviton Manufacturing Co., Inc. Linde	Spark Energy
Cameron-Daniel, P.C.	Los Angeles County Integrated Waste Management Task Force	Sun Light & Power
Casner, Steve	Los Angeles Dept of Water & Power	Sunshine Design
Cenergy Power	MRW & Associates	Tecogen, Inc.
Center for Biological Diversity	Manatt Phelps Phillips	TerraVerde Renewable Partners
	Marin Energy Authority	Tiger Natural Gas, Inc.
Chevron Pipeline and Power	McKenzie & Associates	
City of Palo Alto	Modesto Irrigation District	TransCanada
	Morgan Stanley	Troutman Sanders LLP
City of San Jose	NLine Energy, Inc.	Utility Cost Management
Clean Power Research	NRG Solar	Utility Power Solutions
Coast Economic Consulting		Utility Specialists
Commercial Energy	Office of Ratepayer Advocates	
County of Tehama - Department of Public Works	OnGrid Solar	Verizon
Crossborder Energy	Pacific Gas and Electric Company	Water and Energy Consulting Wellhead Electric Company
Crown Road Energy, LLC	Peninsula Clean Energy	Western Manufactured Housing Communities Association (WMA)
Davis Wright Tremaine LLP		Yep Energy
Day Carter Murphy		
Dept of General Services		
Don Pickett & Associates, Inc.		
Douglass & Liddell		