

PUBLIC UTILITIES COMMISSION  
505 Van Ness Avenue  
San Francisco CA 94102-3298



**Pacific Gas & Electric Company**  
**ELC (Corp ID 39)**  
**Status of Advice Letter 5858E**  
**As of July 23, 2020**

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

Division Assigned: Energy

Date Filed: 06-22-2020

Date to Calendar: 06-29-2020

Authorizing Documents: D1812003

<b>Disposition:</b>	<b>Accepted</b>
<b>Effective Date:</b>	<b>06-22-2020</b>

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

[edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)

AL Certificate Contact Information:

Kimberly Loo

415-973-4587

[PGETariffs@pge.com](mailto:PGETariffs@pge.com)

**PUBLIC UTILITIES COMMISSION**  
505 Van Ness Avenue  
San Francisco CA 94102-3298



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

The Energy Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

- Advice Letter Number
- Name of Filer
- CPUC Corporate ID number of Filer
- Subject of Filing
- Date Filed
- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)
- Effective Date of Filing
- Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

The Energy Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

All inquiries to the California Public Utilities Commission on the status of your Advice Letter Filing will be answered by Energy Division staff based on the information contained in the Energy Division's PAL database from which the AL status certificate is generated. If you have any questions on this matter please contact the:

Energy Division's Tariff Unit by e-mail to  
**[edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)**

June 22, 2020

**Advice 5858-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)<sup>1</sup> 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.<sup>2</sup> 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.

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

<sup>2</sup> 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. Six months from December 21, 2019 falls on June 21, 2020.

**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.<sup>3</sup> Pursuant to General Order 96-B Section 6.2, PG&E is not seeking relief through this advice letter, and it is not subject to protest.

**Effective Date**

PG&E requests that this information-only advice letter become effective upon the date of submittal, which is June 22, 2020.

**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/>.

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



/S/

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Erik Jacobson  
Director, Regulatory Relations

Attachments

cc: Service List A.16-11-005



# 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) #: 5858-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, Contracts

AL Type: ☐ Monthly ☐ Quarterly ☐ Annual ☒ One-Time ☐ Other:

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: 6/22/20

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 proposed<sup>1</sup>: N/A

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

<sup>1</sup>Discuss 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](mailto: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](mailto:PGETariffs@pge.com)

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

Clear Form

# **PACIFIC GAS AND ELECTRIC COMPANY**

## **ATTACHMENT 1**

### **Wheelabrator Shasta Air Quality Attestation**



## APPENDIX C AIR QUALITY ATTESTATION

VIA ELECTRONIC SUBMISSION

**6/10/2020**

**PG&E**

**Attn: Energy Contract Management and Settlements**  
**77 Beale Street, Mail Code NI2E**  
**San Francisco, CA 94105, 04105-1702**

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

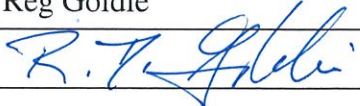
Dear Sir or Madam:

Seller attests that the Project *is* in compliance with all applicable air pollution and control requirements for the period beginning **December 23, 2019** and ending **May 31, 2020**. Seller hereby represents and warrants that:

1. This Air Quality Attestation *is* submitted in compliance to PG&E’s request dated June 1, 2020.
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	Wheelabrator Shasta Energy Company Inc.
Print Name	Reg Goldie
Signature	
Title	VP, Energy Marketing and Sales
Date	June 10, 2020

# **PACIFIC GAS AND ELECTRIC COMPANY**

## **ATTACHMENT 2**

### **Wheelabrator Shasta Compliance Certification Reports**

Facility Name: Wheelabrator Shasta Energy Company  
Reporting Period: November 23, 2019 to May 31, 2020  
Facility Permit Number: 86-VP-08h

Report Due Date: June 10, 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

6/2/20  
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: November 23, 2019 to May 31, 2020  
 Facility Permit: 86-VP-08h

Report Due Date: June 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									
Permit(s) & Conditions(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.	X Yes No	X Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No		
86-VP-08h Condition 2	Photochemically Reactive Solvents - Use low VOC solvent in the plant's parts washer.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X 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.	X Yes No	X Continuous Intermittent	Yes X No	Yes X No	Yes X No	Yes X No		
86-VP-08h Condition 4	BACT - Maintain BACT at the facility, review excess emissions to verify that BACT systems were operating.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No		
86-VP-08h Condition 5a (District-only requirement)	Particulate Limits - Conduct Annual Stack Testing for Particulate using EPA Method 5 and ARB Method 5	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	X Yes 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.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	X Yes No		
86-VP-08h Condition 5c (District-only requirement)	SOx Limits - Note - RR Ties are no longer permitted under Boiler MACT.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	X Yes No		
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.	X Yes No	X Continuous X Intermittent	Yes X No	Yes X No	Yes X No	X Yes 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.	X Yes No	X Continuous X Intermittent	Yes X No	Yes X No	Yes X No	X Yes No		

Facility Name: Wheelabrator Shasta Energy Company  
 Reporting Period: November 23, 2019 to May 31, 2020  
 Facility Permit: 86-VP-08h

Report Due Date: June 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									
Permit(s) & Conditions(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 6 (District-only requirement)	Fugitive Emissions Control - Maintain dust control systems, high wind speed actions, ash handling, housekeeping and work practices.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X 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).	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h Condition 8	Emission Offsets - Obtain appropriate offsets that meet requirements and submit report to AQMD.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h Condition 9	Excess Emissions - Take immediate action on excess emissions. Conduct Annual Stack Testing and maintain Continuous Emissions Monitoring System.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h Condition 10	Halogenated Solvent Degreaser - Obtain AQMD approval prior to using halogenated solvent in the cold cleaning solvent degreaser.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X 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.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
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.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X 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.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X 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.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	

Facility Name: Wheelabrator Shasta Energy Company  
 Reporting Period: November 23, 2019 to May 31, 2020  
 Facility Permit: 86-VP-08h

Report Due Date: June 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																	
Permit(s) & Conditions(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 15	Air Pollution Control Equipment - Maintain facility such that the Air Pollution Control equipment is in service while combustion process is occurring.	X	Yes	No	X	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	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.	X	Yes	No	X	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	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).	X	Yes	No		Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h Condition 19	Steam Limits - Maintain the DAS and fuel use database.	X	Yes	No	X	Continuous		Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h Condition 20	Water Treatment Chemicals – Ensure no chrome-based water treatment chemicals are used.	X	Yes	No	X	Continuous		Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
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.	X	Yes	No	X	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	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.)	X	Yes	No		Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	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.	X	Yes	No		Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h Condition 23 (District-only requirement)	Deodorizer Use Records – Maintain monthly deodorizer use records along with calendar year totals.	X	Yes	No		Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No

Facility Name: Wheelabrator Shasta Energy Company  
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						Any Excursions?		Any Exceedances?		Other Information Indicating Non-Compliance?						
86-VP-08h Condition 24	Emission Test Methods – Use only stipulated test methods unless approved in advance.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
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.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	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.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h Condition 27	Source Test – Use independent vendor; Comply with approved test method procedures.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h Condition 28	Source Tests - Perform source tests at the required frequency. Submit test reports to AQMD as required.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h Condition 29	Excess Emissions - Maintain a log of APCO notifications, Report within 4 hours	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h Condition 30	Permit Deviations - Maintain a log of APCO notifications.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h Condition 31	Semi-Annual Compliance Reports - Submit the semi-annual compliance certification to the District by the required date.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h Condition 32	Annual Compliance Reports - Submit annual certification to the District and U.S. EPA.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No

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Applicable Requirements Table												
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					Any Excursions?		Any Exceedances?		Other Information Indicating Non-Compliance?			
86-VP-08h Condition 33	Emission Limit Demonstration – Verify compliance with standard limits upon request. No request was made.	X   Yes   No	Continuous	X   Intermittent	Yes   X   No	Yes   X   No	Yes   X   No	Yes   X   No	Yes   X   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.	X   Yes   No	Continuous	X   Intermittent	Yes   X   No	Yes   X   No	Yes   X   No	Yes   X   No	Yes   X   No			
86-VP-08h Condition 35	Monitoring and Support Records - Maintain records of maintenance and operation. Maintain CEMS data records.	X   Yes   No	X   Continuous	Intermittent	Yes   X   No	Yes   X   No	Yes   X   No	Yes   X   No	Yes   X   No			
86-VP-08h Condition 36	Emission Increases – Notify AQMD of changes that increase emissions.	X   Yes   No	Continuous	X   Intermittent	Yes   X   No	Yes   X   No	Yes   X   No	Yes   X   No	Yes   X   No			
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.....	X   Yes   No	Continuous	X   Intermittent	Yes   X   No	Yes   X   No	Yes   X   No	Yes   X   No	Yes   X   No			
86-VP-08h Condition 38	Compliance Test Notification & Report Submittals - Maintain all APCO correspondence pertaining to notification of emission testing and testing results.	X   Yes   No	Continuous	X   Intermittent	Yes   X   No	Yes   X   No	Yes   X   No	Yes   X   No	Yes   X   No			
86-VP-08h Condition 39	Testing Facilities - Maintain a safe stack sampling location.	X   Yes   No	Continuous	X   Intermittent	Yes   X   No	Yes   X   No	Yes   X   No	Yes   X   No	Yes   X   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.	X   Yes   No	X   Continuous	Intermittent	Yes   X   No	Yes   X   No	Yes   X   No	Yes   X   No	Yes   X   No			
86-VP-08h Condition 41	Good Operating Practices – Operate and maintain equipment to minimize emissions.	X   Yes   No	X   Continuous	Intermittent	Yes   X   No	Yes   X   No	Yes   X   No	Yes   X   No	Yes   X   No			

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 Facility Permit: 86-VP-08h

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

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				Any Excursions?	Any Exceedances?	Other Information Indicating Non-Compliance?			
86-VP-08h Condition 42	Opacity Monitors Span & Data Acquisition – Maintain properly designed and installed opacity monitors. Maintain COMS data records.	X Yes No	X Continuous Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h Condition 43	CEMs Data – Maintain CEMs operational and log of AQMD notifications.	X Yes No	X Continuous Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X 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.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h Condition 45	Risk Management Plan - Maintain Risk Management Plan.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h Condition 46	CAM Plan - Maintain ESP monitoring computer and records required by the Compliance Assured Monitoring (CAM) Plan.	X Yes No	X Continuous Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h Condition 47	ESP Power - Maintain ESP power monitoring system.	X Yes No	X Continuous Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
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.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h Condition 49	Semi-Annual NSPS Excess Emission Report - Submit semi-annual excess emission report to USEPA Region IX.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h Condition 50	Semi-Annual NSPS Summary Report - Submit semi-annual summary report.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	

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				Any Excursions?	Any Exceedances?	Other Information Indicating Non-Compliance?			
86-VP-08h Condition 51 (District-only requirement)	<b>Fuel Pile Camera &amp; Observations</b> - Use cameras to observe fuel piles. Keep records of observations and keep recordings for 6 months.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No		
86-VP-08h Condition 52 (District-only requirement)	<b>Fuel Pile Dimensions</b> - Conduct quarterly fuel pile surveys.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No		
86-VP-08h Condition 53 (District-only requirement)	<b>Off-Site Fuel Storage</b> - Report off-site fuel storage to the District in the monthly report.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No		
86-VP-08h Condition 54 (District-only requirement)	<b>Fuel Management Plan</b> - Implement the Fuel Management Plan approved by the District. Train operating staff on the plan and keep records.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No		
86-VP-08h Condition 56	<b>Title V Conditions</b> - Comply with all conditions of the permit	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No		
86-VP-08h Condition 62	<b>Information Requests</b> - Supply information to AQMD upon request.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No		
86-VP-08h Condition 63	<b>Construction</b> - Obtain authorization as needed for new equipment or changes to emissions sources.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No		
86-VP-08h Condition 64	<b>Operating Permit</b> - Obtain permits as needed for new equipment or changes to emissions sources.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No		
86-VP-08h Condition 66	<b>Permit</b> - Maintain permits in good condition.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No		

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				Any Excursions?	Any Exceedances?	Other Information Indicating Non-Compliance?			
86-VP-08h Condition 67	Permit Posting – Maintain posted permits in good condition.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h Condition 73	Inspections – Permit entry of authorized agency personnel.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h Condition 75	Permit Renewal – Submit administratively complete permit renewal application within required timeframe.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h Condition 76	Fees – Submit annual fees	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h Condition 77	Ozone Depleting Substances – Hire only certified technicians for ODS work.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h Condition 78	Ozone Depleting Substances – Hire only certified technicians for ODS work.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h Condition 79	Ozone Depleting Substances – Hire only certified technicians for ODS work.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h Condition 80	Circumvention – Maintain operations so as to not circumvent emission limits.	X Yes No	X Continuous Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h Condition 82	Maintenance – Maintain equipment in original operating condition.	X Yes No	X Continuous Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	



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				Any Excursions?	Any Exceedances?	Other Information Indicating Non-Compliance?			
86-VP-08h Condition 84	Equipment Design – Design all equipment to minimize emissions and maintain compliance.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h Condition 86	Training – Provide training for operating staff.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h Condition 87	New Source Performance Standards – Comply with NSPS standards.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X 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.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h Condition 90	Subpart ZZZZ Diesel Engine Records – Maintain maintenance records and records of hours of operation.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
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.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h Condition 93	Energy Assessment – Perform the Energy Assessment. Submit upon request.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X 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.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X 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.	X Yes No	X Continuous Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X 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.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	X Yes 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.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	X Yes 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.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	X Yes No		
86-VP-08h Condition 99	Subpart DDDDD Opacity Limit - Maintain Continuous Opacity Monitors (COMS) and computer to calculate daily block averages.	X Yes No	X Continuous Intermittent	Yes X No	Yes X No	Yes X No	Yes X No		
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.	X Yes No	X Continuous Intermittent	Yes X No	Yes X No	Yes X No	X Yes No		
86-VP-08h Condition 101	Subpart DDDDD Boiler Emission Averaging - Emission averaging is not done. No plan needed, not using emissions averaging.	X Yes No	X Continuous Intermittent	Yes X No	Yes X No	Yes X No	Yes X No		
86-VP-08h Condition 102	Subpart DDDDD Good Operating Practices - Operate and maintain equipment to minimize emissions.	X Yes No	X Continuous Intermittent	Yes X No	Yes X No	Yes X No	Yes X 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.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No		
86-VP-08h Condition 104	Subpart DDDDD Affirmative Defense - May be made for malfunctions as per requirements	X Yes No	X Continuous Intermittent	Yes X No	Yes X No	Yes X No	Yes X 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.	X	Yes	No	X	Continuous	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h Condition 106	Subpart DDDDD Site Specific Monitoring Plan – Develop and maintain a Site Specific Monitoring Plan. Submit upon request.	X	Yes	No	X	Continuous	Intermittent	Yes	X	No	Yes	X	No	Yes	X	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.	X	Yes	No	X	Continuous	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h Condition 108	Subpart DDDDD Initial Performance Test – Perform the initial testing.	X	Yes	No		Continuous	X Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h Condition 109	Initial Performance Testing Alternative: Fuel Sampling & Analysis – This option was not used.	X	Yes	No		Continuous	X Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
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.	X	Yes	No		Continuous	X Intermittent	Yes	X	No	Yes	X	No	Yes	X	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.	X	Yes	No		Continuous	X Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h Condition 112	Periodic Performance Testing – Perform testing annually (at least every 12 months), or every 3 <sup>rd</sup> 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.	X	Yes	No		Continuous	X Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h Condition 113	Periodic Performance Testing Alternative: Fuel Sampling & Analysis – This option is not used.	X	Yes	No		Continuous	X Intermittent	Yes	X	No	Yes	X	No	Yes	X	No

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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.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No		
86-VP-08h Condition 115	Performance Test Reports – Submit performance test reports as required in the permit.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No		
86-VP-08h Condition 116	New Fuel Requirements –No new fuels used during the reporting period.	X Yes No	X Continuous Intermittent	Yes X No	Yes X No	Yes X No	Yes X 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.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No		
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.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No		
86-VP-08h Condition 119	40 CFR 63 Subpart DDDDD Semi-Annual Compliance Reports – Submit semi-annual reports.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No		
86-VP-08h Condition 120	Maintain 40 CFR 63 Subpart DDDDD Records – Subpart DDDDD records are maintained as required.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No		
86-VP-08h Condition 121	Alternative Output Based Limits & Credit for Energy Conservation Measures – These options are not used.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No		

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.
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

## 2020 Semi-Annual 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 <sub>2</sub>	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 <sub>3</sub>	ppm @ 3% O <sub>2</sub>	19.4	28	SCAQMD 207.1 Modified	6/24/19 and 6/25/19
Oxides of Sulfur - SO <sub>2</sub>	ppm @ 3% O <sub>2</sub>	0.1	24	EPA Method 6C	6/24/19 and 6/25/19
Oxides of Sulfur - SO <sub>2</sub>	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 <sub>2</sub>	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 <sub>2</sub>	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

## 2020 Semi-Annual 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 <sub>2</sub>	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 <sub>3</sub>	ppm @ 3% O <sub>2</sub>	21.5	28	SCAQMD 207.1 Modified	6/28/19
Oxides of Sulfur - SO <sub>2</sub>	ppm @ 3% O <sub>2</sub>	0	24	EPA Method 6C	6/28/19
Oxides of Sulfur - SO <sub>2</sub>	lbs/hr	0	45 Total all three boilers	EPA Method 6C	6/28/19
Filterable Particulate	gr/dscf @ 3% O <sub>2</sub>	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 <sub>2</sub>	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

## 2020 Semi-Annual 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 <sub>2</sub>	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 <sub>3</sub>	ppm @ 3% O <sub>2</sub>	17.5	28	SCAQMD 207.1 Modified	6/29/19
Oxides of Sulfur - SO <sub>2</sub>	ppm @ 3% O <sub>2</sub>	0	24	EPA Method 6C	6/29/19
Oxides of Sulfur - SO <sub>2</sub>	lbs/hr	0	45 Total all three boilers	EPA Method 6C	6/29/19
Filterable Particulate	gr/dscf @ 3% O <sub>2</sub>	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 <sub>2</sub>	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





DELIVERED by: Email

December 19, 2019

Mr. Paul Hellman  
Air Pollution Control Officer  
Air Quality Management District  
1855 Placer Street  
Redding, CA 96001

**Subject: Wheelabrator Shasta Energy Company Emissions Report for the Month of November 2019, Title V Operating Permit 86-VP-08h and Permits to Operate No. 86-PO-08o and 89-PO-04f.**

Dear Mr. Hellman:

Attached you will find the November 2019 Emissions Report for our wood fired power plant. The report consists of the following tables.

Table I – 30-Day Rolling Averages for CO and NOx Emissions  
Table II – Daily Hours of Operation for the Facility  
Table III – 12-Month Capacity Utilization for Wood & Natural Gas  
Table IV – Monthly Railroad Tie Usage & Associated Estimated SO2 Emissions  
Table V – NOx and CO Emissions During Startup and Shutdown  
Table VI – CEMS Downtime  
Table VII – Emission Exceedances & 6-Minute Block Opacity Averages > 20%

The CEMS were in service the entire month while the facility was operating except during periods of daily calibration and the periods of maintenance or malfunction, as listed in Table VI.

The steam generated during the month of November is given below.

Boiler #1 0.808E+8 pounds  
Boiler #2 0.761E+8 pounds  
Boiler #3 0.993E+8 pounds

No fuel was being stored off-site at the end of November.

Roseburg Site - 5197 Deschutes Road, Anderson, CA - 0.0 bone dry tons  
Peterson Yard - 19195 Latona Rd., Anderson CA - 0.0 bone dry tons  
Burney Yard - Hwy 299, Burney CA - 13,019.0 bone dry tons

Based upon information and belief formed after reasonable inquiry, I am certifying that the statements and information in this report are true, accurate, and complete. If you have any questions please contact Derrick Boom at (530) 339-7627.

Sincerely,

A handwritten signature in dark ink, appearing to read "Bryan Booth", is written over a horizontal line.

Bryan Booth  
Plant Manager

enc    Tables I through Table VII  
         Fuel Sampling Results  
         Fuel Pile Survey Results

WHEELABRATOR SHASTA ENERGY  
CONTINUOUS MONITORING AND REPORTING  
TABLE I - NOx and CO 30 DAY Rolling Averages

[illegible]

Table II  
Wheelabrator Shasta Energy Company  
Boiler Hours

Date	Boiler 1	Boiler 2	Boiler 3
11/1/2019	0.0	24.0	24.0
11/2/2019	0.0	24.0	24.0
11/3/2019	0.0	24.0	24.0
11/4/2019	4.2	24.0	24.0
11/5/2019	24.0	24.0	24.0
11/6/2019	24.0	24.0	24.0
11/7/2019	24.0	24.0	24.0
11/8/2019	24.0	17.5	24.0
11/9/2019	24.0	24.0	24.0
11/10/2019	24.0	24.0	24.0
11/11/2019	24.0	24.0	24.0
11/12/2019	24.0	24.0	24.0
11/13/2019	24.0	24.0	24.0
11/14/2019	24.0	24.0	24.0
11/15/2019	24.0	24.0	24.0
11/16/2019	24.0	24.0	24.0
11/17/2019	24.0	20.4	24.0
11/18/2019	24.0	0.0	24.0
11/19/2019	24.0	0.0	24.0
11/20/2019	24.0	0.0	24.0
11/21/2019	24.0	0.0	24.0
11/22/2019	24.0	3.4	24.0
11/23/2019	24.0	24.0	24.0
11/24/2019	24.0	24.0	24.0
11/25/2019	24.0	24.0	24.0
11/26/2019	24.0	24.0	24.0
11/27/2019	24.0	24.0	24.0
11/28/2019	24.0	24.0	24.0
11/29/2019	24.0	24.0	24.0
11/30/2019	24.0	24.0	24.0
	628.2	593.4	720.0

**TABLE III**  
**ANNUAL CAPACITY FACTOR**  
**WHEELABRATOR SHASTA ENERGY**  
**(PERMITTED CAPACITY 1,017 MMBTU / HR)**

			Monthly Average	Annual Capacity	Annual Capacity	Annual Capacity
Month / Year	Natural Gas	Wood	Heat Input	Factor	Factor	Factor Total
	MMBTU	MMBTU	MMBTU / HR	Natural Gas	Wood	Fuels
11/01/19	435	440,834	613	0.31%	56.7%	57.1%
10/01/19	330	413,390	556	0.32%	55.6%	55.9%
09/01/19	16	455,492	633	0.33%	55.8%	56.1%
08/01/19	5,696	340,640	466	0.33%	55.3%	55.7%
07/01/19	29	514,032	691	0.27%	55.8%	56.1%
06/01/19	1,346	416,668	581	0.27%	54.6%	54.9%
05/01/19	825	481,310	648	0.27%	54.5%	54.8%
04/01/19	4,646	453,571	636	0.26%	54.1%	54.3%
03/01/19	0	178,080	239	0.22%	52.8%	53.0%
02/01/19	10,964	360,447	553	0.23%	55.6%	55.8%
01/01/19	3,361	495,225	670	0.11%	56.0%	56.1%
12/01/18	402	505,823	680	0.08%	55.3%	55.4%

Table IV  
Wheelabrator Shasta Energy Company  
Estimated SO2 Emissions from Creosote Treated Wood (CTW)  
and Cardboard

Month	CTW and Paper Dry tons	% Sulfur	Estimated SO2 Emissions, tons
January	0	0.0	0.0
February	0	0.0	0.0
March	0	0.0	0.0
April	0	0.0	0.0
May	0	0.0	0.0
June	0	0.0	0.0
July	0	0.0	0.0
August	0	0.0	0.0
September	0	0.0	0.0
October	0	0.0	0.0
November	0	0.0	0.0
December			
YTD	0		0.0

Conversion Factor - 0.6 lb SO2/lb S input

WHEELABRATOR SHASTA ENERGY  
CONTINUOUS MONITORING AND REPORTING  
TABLE V - NOx and CO Emissions During Startup, Shutdown & Malfunction (Natural Gas Only)

Date	Boiler 1			Boiler 2			Boiler 3		
	Duration hr	NOx lb/hr	CO lb/hr	Duration hr	NOx lb/hr	CO lb/hr	Duration hr	NOx lb/hr	CO lb/hr
11/1/2019									
11/2/2019									
11/3/2019									
11/4/2019	5.0	1.4	0.2						
11/5/2019									
11/6/2019									
11/7/2019									
11/8/2019				1.0	4.8	1.4			
11/9/2019									
11/10/2019									
11/11/2019									
11/12/2019									
11/13/2019									
11/14/2019									
11/15/2019									
11/16/2019									
11/17/2019									
11/18/2019									
11/19/2019									
11/20/2019									
11/21/2019									
11/22/2019				5.0	4.8	0.5			
11/23/2019									
11/24/2019									
11/25/2019									
11/26/2019									
11/27/2019									
11/28/2019									
11/29/2019									
11/30/2019									

F Factor = 1040 Natural gas only

**Note:** This report shows downtime for gas analyzers at the 1-hour level and opacity monitors at the 6-minute level

The abbreviations for the parameters are:

NOXR	NOx ppm @ 3% O2 for Condition 5d reporting
COR	CO ppm @ 3% O2 for Condition 5e reporting
COM	CO ppm @ 3% O2 for Condition 95 reporting (Boiler MACT)
OPAC	% Opacity

**There were no emission exceedances this month.**

[illegible]





DELIVERED by: Email

January 20, 2020

Mr. Paul Hellman  
Air Pollution Control Officer  
Air Quality Management District  
1855 Placer Street  
Redding, CA 96001

**Subject: Wheelabrator Shasta Energy Company Emissions Report for the Month of December 2019, Title V Operating Permit 86-VP-08h and Permits to Operate No. 86-PO-08o and 89-PO-04f.**

Dear Mr. Hellman:

Attached you will find the December 2019 Emissions Report for our wood fired power plant. The report consists of the following tables.

Table I – 30-Day Rolling Averages for CO and NOx Emissions  
Table II – Daily Hours of Operation for the Facility  
Table III – 12-Month Capacity Utilization for Wood & Natural Gas  
Table IV – Monthly Railroad Tie Usage & Associated Estimated SO2 Emissions  
Table V – NOx and CO Emissions During Startup and Shutdown  
Table VI – CEMS Downtime  
Table VII – Emission Exceedances & 6-Minute Block Opacity Averages > 20%

The CEMS were in service the entire month while the facility was operating except during periods of daily calibration and the periods of maintenance or malfunction, as listed in Table VI.

The steam generated during the month of December is given below.

Boiler #1 0.875E+8 pounds  
Boiler #2 0.830E+8 pounds  
Boiler #3 0.888E+8 pounds

No fuel was being stored off-site at the end of December.

Roseburg Site - 5197 Deschutes Road, Anderson, CA - 0.0 bone dry tons  
Peterson Yard - 19195 Latona Rd., Anderson CA - 0.0 bone dry tons  
Burney Yard - Hwy 299, Burney CA - 13,019.0 bone dry tons

Based upon information and belief formed after reasonable inquiry, I am certifying that the statements and information in this report are true, accurate, and complete. If you have any questions please contact Derrick Boom at (530) 339-7627.

Sincerely,

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

Bryan Booth  
Plant Manager

enc    Tables I through Table VII  
         Fuel Sampling Results  
         Fuel Pile Survey Results  
         Quarterly CGA and Opacity Audit Reports

WHEELABRATOR SHASTA ENERGY  
CONTINUOUS MONITORING AND REPORTING  
TABLE I - NOx and CO 30 DAY Rolling Averages

Date	Boiler 1			Boiler 2			Boiler 3		
	NOx @ 3% O2 ppm	NOx lb/MMBtu	CO @ 3% O2 ppm	NOx @ 3% O2 ppm	NOx lb/MMBtu	CO @ 3% O2 ppm	NOx @ 3% O2 ppm	NOx lb/MMBtu	CO @ 3% O2 ppm
12/1/2019	109.3	0.145	211	113.4	0.146	226	113.2	0.146	221
12/2/2019	112.7	0.145	215	113.3	0.146	216	113.2	0.146	216
12/3/2019	112.7	0.145	214	113.3	0.146	202	113.2	0.146	210
12/4/2019	112.7	0.145	213	113.3	0.146	196	113.2	0.146	203
12/5/2019	112.7	0.145	216	113.3	0.146	177	113.2	0.146	202
12/6/2019	112.7	0.145	216	113.3	0.146	167	113.2	0.146	203
12/7/2019	112.7	0.145	222	113.3	0.146	162	113.2	0.146	205
12/8/2019	112.7	0.145	213	113.3	0.146	157	113.2	0.146	207
12/9/2019	112.8	0.145	216	113.3	0.146	162	113.2	0.146	212
12/10/2019	112.7	0.145	217	113.3	0.146	165	113.2	0.146	215
12/11/2019	112.7	0.145	226	113.3	0.146	169	113.2	0.146	220
12/12/2019	112.7	0.145	230	113.1	0.146	173	113.2	0.146	226
12/13/2019	112.7	0.145	231	113.1	0.146	179	113.2	0.146	229
12/14/2019	112.7	0.145	235	113.1	0.146	184	113.3	0.146	229
12/15/2019	112.7	0.145	238	113.1	0.146	190	113.3	0.146	230
12/16/2019	112.7	0.145	237	113.2	0.146	190	113.3	0.146	228
12/17/2019	112.7	0.145	238	113.1	0.146	194	113.3	0.146	228
12/18/2019	112.7	0.145	229	113.2	0.146	201	113.3	0.146	225
12/19/2019	112.7	0.145	227	113.1	0.146	208	113.3	0.146	216
12/20/2019	112.7	0.145	218	113.1	0.146	217	113.3	0.146	206
12/21/2019	112.7	0.145	217	113.1	0.146	220	113.2	0.146	203
12/22/2019	112.6	0.145	220	113.1	0.146	223	113.2	0.146	204
12/23/2019	112.6	0.145	226	113.1	0.146	228	113.2	0.146	207
12/24/2019	112.5	0.145	233	113.2	0.146	236	113.1	0.145	214
12/25/2019	112.4	0.145	236	113.1	0.146	242	113.1	0.145	214
12/26/2019	112.4	0.145	237	113.2	0.146	244	113.1	0.145	215
12/27/2019	112.5	0.145	241	113.2	0.146	248	112.9	0.145	219
12/28/2019	112.6	0.145	245	113.2	0.146	251	112.9	0.145	220
12/29/2019	112.6	0.145	252	113.2	0.146	259	112.9	0.145	226
12/30/2019	112.6	0.145	256	113.2	0.146	261	112.9	0.145	228
12/31/2019	112.7	0.145	263	113.2	0.146	265	112.8	0.145	234

Table II  
Wheelabrator Shasta Energy Company  
Boiler Hours

Date	Boiler 1	Boiler 2	Boiler 3
12/1/2019	24.0	24.0	24.0
12/2/2019	24.0	24.0	24.0
12/3/2019	24.0	24.0	24.0
12/4/2019	24.0	24.0	24.0
12/5/2019	24.0	24.0	24.0
12/6/2019	24.0	24.0	24.0
12/7/2019	24.0	24.0	24.0
12/8/2019	24.0	24.0	24.0
12/9/2019	24.0	24.0	24.0
12/10/2019	24.0	24.0	24.0
12/11/2019	24.0	20.9	24.0
12/12/2019	24.0	24.0	24.0
12/13/2019	24.0	24.0	24.0
12/14/2019	24.0	24.0	24.0
12/15/2019	24.0	24.0	24.0
12/16/2019	24.0	24.0	24.0
12/17/2019	24.0	24.0	24.0
12/18/2019	24.0	24.0	24.0
12/19/2019	24.0	24.0	24.0
12/20/2019	24.0	24.0	24.0
12/21/2019	24.0	24.0	24.0
12/22/2019	24.0	24.0	24.0
12/23/2019	24.0	24.0	24.0
12/24/2019	24.0	24.0	24.0
12/25/2019	24.0	24.0	24.0
12/26/2019	24.0	24.0	24.0
12/27/2019	24.0	24.0	24.0
12/28/2019	24.0	24.0	24.0
12/29/2019	24.0	24.0	24.0
12/30/2019	24.0	24.0	24.0
12/31/2019	24.0	24.0	24.0
	744.0	740.9	744.0

**TABLE III**  
**ANNUAL CAPACITY FACTOR**  
**WHEELABRATOR SHASTA ENERGY**  
**(PERMITTED CAPACITY 1,017 MMBTU / HR)**

			Monthly Average	Annual Capacity	Annual Capacity	Annual Capacity
Month / Year	Natural Gas	Wood	Heat Input	Factor	Factor	Factor Total
	MMBTU	MMBTU	MMBTU / HR	Natural Gas	Wood	Fuels
12/01/19	385	432,402	582	0.31%	55.9%	56.2%
11/01/19	435	440,834	613	0.31%	56.7%	57.1%
10/01/19	330	413,390	556	0.32%	55.6%	55.9%
09/01/19	16	455,492	633	0.33%	55.8%	56.1%
08/01/19	5,696	340,640	466	0.33%	55.3%	55.7%
07/01/19	29	514,032	691	0.27%	55.8%	56.1%
06/01/19	1,346	416,668	581	0.27%	54.6%	54.9%
05/01/19	825	481,310	648	0.27%	54.5%	54.8%
04/01/19	4,646	453,571	636	0.26%	54.1%	54.3%
03/01/19	0	178,080	239	0.22%	52.8%	53.0%
02/01/19	10,964	360,447	553	0.23%	55.6%	55.8%
01/01/19	3,361	495,225	670	0.11%	56.0%	56.1%

Table IV  
Wheelabrator Shasta Energy Company  
Estimated SO2 Emissions from Creosote Treated Wood (CTW)  
and Cardboard

Month	CTW and Paper Dry tons	% Sulfur	Estimated SO2 Emissions, tons
January	0	0.0	0.0
February	0	0.0	0.0
March	0	0.0	0.0
April	0	0.0	0.0
May	0	0.0	0.0
June	0	0.0	0.0
July	0	0.0	0.0
August	0	0.0	0.0
September	0	0.0	0.0
October	0	0.0	0.0
November	0	0.0	0.0
December	0	0.0	0.0
YTD	0		0.0

Conversion Factor - 0.6 lb SO2/lb S input

WHEELABRATOR SHASTA ENERGY  
 CONTINUOUS MONITORING AND REPORTING  
 TABLE V - NOx and CO Emissions During Startup, Shutdown & Malfunction (Natural Gas Only)

Date	Boiler 1			Boiler 2			Boiler 3		
	Duration hr	NOx lb/hr	CO lb/hr	Duration hr	NOx lb/hr	CO lb/hr	Duration hr	NOx lb/hr	CO lb/hr
12/1/2019									
12/2/2019									
12/3/2019									
12/4/2019									
12/5/2019									
12/6/2019									
12/7/2019									
12/8/2019									
12/9/2019									
12/10/2019									
12/11/2019									
12/12/2019									
12/13/2019									
12/14/2019									
12/15/2019									
12/16/2019									
12/17/2019									
12/18/2019									
12/19/2019									
12/20/2019									
12/21/2019									
12/22/2019									
12/23/2019									
12/24/2019									
12/25/2019									
12/26/2019									
12/27/2019									
12/28/2019									
12/29/2019									
12/30/2019									
12/31/2019									

F Factor = 1040 Natural gas only

**Note:** This report shows downtime for gas analyzers at the 1-hour level and opacity monitors at the 6-minute level

The abbreviations for the parameters are:

NOXR	NOx ppm @ 3% O2 for Condition 5d reporting
COR	CO ppm @ 3% O2 for Condition 5e reporting
COM	CO ppm @ 3% O2 for Condition 95 reporting (Boiler MACT)
OPAC	% Opacity

**There were no emission exceedances this month.**

**There were no emission exceedances this month.**





DELIVERED by: Email

February 19, 2020

Mr. Paul Hellman  
Air Pollution Control Officer  
Air Quality Management District  
1855 Placer Street  
Redding, CA 96001

**Subject: Wheelabrator Shasta Energy Company Emissions Report for the Month of January 2020, Title V Operating Permit 86-VP-08h and Permits to Operate No. 86-PO-08o and 89-PO-04f.**

Dear Mr. Hellman:

Attached you will find the January 2020 Emissions Report for our wood fired power plant. The report consists of the following tables.

Table I – 30-Day Rolling Averages for CO and NOx Emissions  
Table II – Daily Hours of Operation for the Facility  
Table III – 12-Month Capacity Utilization for Wood & Natural Gas  
Table IV – Monthly Railroad Tie Usage & Associated Estimated SO2 Emissions  
Table V – NOx and CO Emissions During Startup and Shutdown  
Table VI – CEMS Downtime  
Table VII – Emission Exceedances & 6-Minute Block Opacity Averages > 20%

The CEMS were in service the entire month while the facility was operating except during periods of daily calibration and the periods of maintenance or malfunction, as listed in Table VI.

The steam generated during the month of January is given below.

Boiler #1 0.822E+8 pounds  
Boiler #2 0.791E+8 pounds  
Boiler #3 0.812E+8 pounds

Fuel stored off-site at the end of January is listed below. Off-site fuel storage should end by Indefinite.

Peterson Yard - 19195 Latona Rd., Anderson CA - 0.0 bone dry tons  
Burney Yard - Hwy 299, Burney CA - 13,018.0 bone dry tons

Based upon information and belief formed after reasonable inquiry, I am certifying that the statements and information in this report are true, accurate, and complete. If you have any questions please contact Derrick Boom at (530) 339-7627.

Sincerely,

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

Bryan Booth  
Plant Manager

enc    Tables I through Table VII  
         Fuel Sampling Results  
         Fuel Pile Survey Results

WHEELABRATOR SHASTA ENERGY  
CONTINUOUS MONITORING AND REPORTING  
TABLE I - NOx and CO 30 DAY Rolling Averages

Date	Boiler 1			Boiler 2			Boiler 3		
	NOx @ 3% O2 ppm	NOx lb/MMBtu	CO @ 3% O2 ppm	NOx @ 3% O2 ppm	NOx lb/MMBtu	CO @ 3% O2 ppm	NOx @ 3% O2 ppm	NOx lb/MMBtu	CO @ 3% O2 ppm
1/1/2020	112.7	0.145	266	113.2	0.146	268	112.8	0.145	239
1/2/2020	112.7	0.145	269	113.2	0.146	271	112.8	0.145	245
1/3/2020	112.7	0.145	275	113.2	0.146	274	112.8	0.145	253
1/4/2020	112.7	0.145	280	113.2	0.146	278	112.8	0.145	259
1/5/2020	112.6	0.145	280	113.2	0.146	280	112.8	0.145	263
1/6/2020	112.7	0.145	278	113.2	0.146	278	112.8	0.145	265
1/7/2020	112.6	0.145	279	113.2	0.146	280	112.7	0.145	269
1/8/2020	112.6	0.145	277	113.2	0.146	278	112.7	0.145	267
1/9/2020	112.5	0.145	278	113.2	0.146	281	112.7	0.145	266
1/10/2020	112.5	0.145	273	113.3	0.146	281	112.7	0.145	264
1/11/2020	112.5	0.145	272	113.3	0.146	277	112.7	0.145	262
1/12/2020	112.5	0.145	274	113.3	0.146	276	112.7	0.145	263
1/13/2020	112.4	0.145	272	113.3	0.146	277	112.6	0.145	266
1/14/2020	112.3	0.145	274	113.2	0.146	276	112.6	0.145	270
1/15/2020	112.2	0.144	279	113.3	0.146	277	112.6	0.145	272
1/16/2020	111.9	0.144	281	113.3	0.146	274	112.6	0.145	273
1/17/2020	111.7	0.144	281	113.3	0.146	269	112.5	0.145	272
1/18/2020	111.7	0.144	279	113.3	0.146	265	112.5	0.145	274
1/19/2020	111.6	0.144	283	113.3	0.146	261	112.5	0.145	278
1/20/2020	111.5	0.144	285	113.3	0.146	260	112.5	0.145	278
1/21/2020	111.6	0.144	279	113.3	0.146	255	112.5	0.145	274
1/22/2020	111.6	0.144	279	113.3	0.146	253	112.5	0.145	278
1/23/2020	111.6	0.144	278	113.3	0.146	250	112.5	0.145	279
1/24/2020	111.7	0.144	282	113.3	0.146	250	112.4	0.145	284
1/25/2020	111.7	0.144	285	113.3	0.146	252	112.5	0.145	285
1/26/2020	111.7	0.144	283	113.4	0.146	249	112.7	0.145	282
1/27/2020	111.7	0.144	278	113.4	0.146	244	112.7	0.145	277
1/28/2020	111.8	0.144	273	113.4	0.146	238	112.7	0.145	272
1/29/2020	111.9	0.144	272	113.4	0.146	241	112.7	0.145	271
1/30/2020	111.9	0.144	267	113.4	0.146	238	112.8	0.145	271
1/31/2020	111.9	0.144	263	113.4	0.146	240	112.9	0.145	268

Table II  
Wheelabrator Shasta Energy Company  
Boiler Hours

Date	Boiler 1	Boiler 2	Boiler 3
1/1/2020	24.0	24.0	24.0
1/2/2020	24.0	24.0	24.0
1/3/2020	24.0	24.0	24.0
1/4/2020	24.0	24.0	24.0
1/5/2020	24.0	24.0	24.0
1/6/2020	24.0	24.0	24.0
1/7/2020	24.0	24.0	24.0
1/8/2020	24.0	24.0	24.0
1/9/2020	24.0	24.0	24.0
1/10/2020	24.0	24.0	24.0
1/11/2020	24.0	24.0	24.0
1/12/2020	24.0	24.0	24.0
1/13/2020	24.0	24.0	24.0
1/14/2020	24.0	24.0	24.0
1/15/2020	24.0	24.0	24.0
1/16/2020	24.0	24.0	24.0
1/17/2020	24.0	24.0	24.0
1/18/2020	24.0	24.0	24.0
1/19/2020	24.0	24.0	24.0
1/20/2020	24.0	24.0	24.0
1/21/2020	24.0	24.0	24.0
1/22/2020	24.0	24.0	24.0
1/23/2020	24.0	24.0	24.0
1/24/2020	24.0	24.0	24.0
1/25/2020	24.0	24.0	24.0
1/26/2020	24.0	24.0	24.0
1/27/2020	24.0	24.0	24.0
1/28/2020	24.0	24.0	24.0
1/29/2020	24.0	24.0	24.0
1/30/2020	24.0	24.0	24.0
1/31/2020	24.0	24.0	24.0
	744.0	744.0	744.0

**TABLE III**  
**ANNUAL CAPACITY FACTOR**  
**WHEELABRATOR SHASTA ENERGY**  
**(PERMITTED CAPACITY 1,017 MMBTU / HR)**

			Monthly Average	Annual Capacity	Annual Capacity	Annual Capacity
Month / Year	Natural Gas	Wood	Heat Input	Factor	Factor	Factor Total
	MMBTU	MMBTU	MMBTU / HR	Natural Gas	Wood	Fuels
01/01/20	27	428,160	576	0.28%	55.2%	55.4%
12/01/19	385	432,444	582	0.31%	55.9%	56.2%
11/01/19	435	440,834	613	0.31%	56.7%	57.1%
10/01/19	330	413,390	556	0.32%	55.6%	55.9%
09/01/19	16	455,492	633	0.33%	55.8%	56.1%
08/01/19	5,696	340,640	466	0.33%	55.3%	55.7%
07/01/19	29	514,032	691	0.27%	55.8%	56.1%
06/01/19	1,346	416,668	581	0.27%	54.6%	54.9%
05/01/19	825	481,310	648	0.27%	54.5%	54.8%
04/01/19	4,646	453,571	636	0.26%	54.1%	54.3%
03/01/19	0	178,080	239	0.22%	52.8%	53.0%
02/01/19	10,964	360,447	553	0.23%	55.6%	55.8%

Table IV  
Wheelabrator Shasta Energy Company  
Estimated SO2 Emissions from Creosote Treated Wood (CTW)  
and Cardboard

Month	CTW and Paper Dry tons	% Sulfur	Estimated SO2 Emissions, tons
January	0	NA	0.0
February			
March			
April			
May			
June			
July			
August			
September			
October			
November			
December			
YTD	0		0.0

Conversion Factor - 0.6 lb SO2/lb S input

WHEELABRATOR SHASTA ENERGY  
 CONTINUOUS MONITORING AND REPORTING  
 TABLE V - NOx and CO Emissions During Startup, Shutdown & Malfunction (Natural Gas Only)

Date	Boiler 1			Boiler 2			Boiler 3		
	Duration hr	NOx lb/hr	CO lb/hr	Duration hr	NOx lb/hr	CO lb/hr	Duration hr	NOx lb/hr	CO lb/hr
1/1/2020									
1/2/2020									
1/3/2020									
1/4/2020									
1/5/2020									
1/6/2020									
1/7/2020									
1/8/2020									
1/9/2020									
1/10/2020									
1/11/2020									
1/12/2020									
1/13/2020									
1/14/2020									
1/15/2020									
1/16/2020									
1/17/2020									
1/18/2020									
1/19/2020									
1/20/2020									
1/21/2020									
1/22/2020									
1/23/2020									
1/24/2020									
1/25/2020									
1/26/2020									
1/27/2020									
1/28/2020									
1/29/2020									
1/30/2020									
1/31/2020									

F Factor = 1040 Natural gas only

**Note:** This report shows downtime for gas analyzers at the 1-hour level and opacity monitors at the 6-minute level

The abbreviations for the parameters are:

NOXR	NOx ppm @ 3% O2 for Condition 5d reporting
COR	CO ppm @ 3% O2 for Condition 5e reporting
COM	CO ppm @ 3% O2 for Condition 95 reporting (Boiler MACT)
OPAC	% Opacity

**There were no emission exceedances this month.**

[illegible]





DELIVERED by: Email

March 17, 2020

Mr. Paul Hellman  
Air Pollution Control Officer  
Air Quality Management District  
1855 Placer Street  
Redding, CA 96001

**Subject: Wheelabrator Shasta Energy Company Emissions Report for the Month of February 2020,  
Title V Operating Permit 86-VP-08h and Permits to Operate No. 86-PO-08o and 89-PO-04f.**

Dear Mr. Hellman:

Attached you will find the February 2020 Emissions Report for our wood fired power plant. The report consists of the following tables.

Table I – 30-Day Rolling Averages for CO and NOx Emissions  
Table II – Daily Hours of Operation for the Facility  
Table III – 12-Month Capacity Utilization for Wood & Natural Gas  
Table IV – Monthly Railroad Tie Usage & Associated Estimated SO2 Emissions  
Table V – NOx and CO Emissions During Startup and Shutdown  
Table VI – CEMS Downtime  
Table VII – Emission Exceedances & 6-Minute Block Opacity Averages > 20%

The CEMS were in service the entire month while the facility was operating except during periods of daily calibration and the periods of maintenance or malfunction, as listed in Table VI.

The steam generated during the month of February is given below.

Boiler #1 0.945E+8 pounds  
Boiler #2 0.903E+8 pounds  
Boiler #3 0.377E+8 pounds

Fuel stored off-site at the end of February is listed below. Off-site fuel storage should end by Indefinite.

Peterson Yard - 19195 Latona Rd., Anderson CA - 0.0 bone dry tons  
Burney Yard - Hwy 299, Burney CA - 13,018.0 bone dry tons

Based upon information and belief formed after reasonable inquiry, I am certifying that the statements and information in this report are true, accurate, and complete. If you have any questions please contact Derrick Boom at (530) 339-7627.

Sincerely,

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

Bryan Booth  
Plant Manager

enc Tables I through Table VII  
Fuel Sampling Results  
Fuel Pile Survey Results

Quarterly CGA and Opacity Audit Reports

**WHEELABRATOR SHASTA ENERGY  
CONTINUOUS MONITORING AND REPORTING  
TABLE I - NOx and CO 30 DAY Rolling Averages**

[illegible]

**Table II**  
**Wheelabrator Shasta Energy Company**  
**Boiler Hours**

Date	Boiler 1	Boiler 2	Boiler 3
2/1/20	24.0	24.0	24.0
2/2/20	24.0	24.0	24.0
2/3/20	24.0	24.0	24.0
2/4/20	24.0	24.0	24.0
2/5/20	24.0	24.0	24.0
2/6/20	24.0	24.0	24.0
2/7/20	24.0	24.0	24.0
2/8/20	24.0	24.0	24.0
2/9/20	24.0	24.0	20.8
2/10/20	24.0	24.0	0.0
2/11/20	24.0	24.0	0.0
2/12/20	24.0	24.0	0.0
2/13/20	24.0	24.0	0.0
2/14/20	24.0	24.0	0.0
2/15/20	24.0	24.0	0.0
2/16/20	24.0	24.0	0.0
2/17/20	24.0	24.0	1.8
2/18/20	24.0	24.0	24.0
2/19/20	24.0	24.0	11.9
2/20/20	24.0	24.0	0.0
2/21/20	24.0	24.0	0.0
2/22/20	24.0	24.0	0.0
2/23/20	24.0	24.0	0.0
2/24/20	24.0	24.0	0.0
2/25/20	24.0	24.0	2.1
2/26/20	24.0	17.2	24.0
2/27/20	24.0	24.0	24.0
2/28/20	24.0	24.0	24.0
2/29/20	24.0	24.0	24.0
Total Hours	696.0	689.2	348.7

**TABLE III**  
**ANNUAL CAPACITY FACTOR**  
**WHEELABRATOR SHASTA ENERGY**  
**(PERMITTED CAPACITY 1,017 MMBTU / HR)**

			Monthly Average	Annual Capacity	Annual Capacity	Annual Capacity
Month / Year	Natural Gas	Wood	Heat Input	Factor	Factor	Factor Total
	MMBTU	MMBTU	MMBTU / HR	Natural Gas	Wood	Fuels
2/1/20	512	390,266	561	0.16%	55.5%	55.7%
1/1/20	27	428,160	576	0.28%	55.2%	55.4%
12/1/19	385	432,444	582	0.31%	55.9%	56.2%
11/1/19	435	440,834	613	0.31%	56.7%	57.1%
10/1/19	330	413,390	556	0.32%	55.6%	55.9%
9/1/19	16	455,492	633	0.33%	55.8%	56.1%
8/1/19	5,696	340,640	466	0.33%	55.3%	55.7%
7/1/19	29	514,032	691	0.27%	55.8%	56.1%
6/1/19	1,346	416,668	581	0.27%	54.6%	54.9%
5/1/19	825	481,310	648	0.27%	54.5%	54.8%
4/1/19	4,646	453,571	636	0.26%	54.1%	54.3%
3/1/19	0	178,080	239	0.22%	52.8%	53.0%
2/1/19	10,964	360,447	553	0.23%	55.6%	55.8%
1/1/19	3,361	495,225	670	0.11%	56.0%	56.1%
12/1/18	402	505,823	680			
11/1/18	1,258	335,814	468			
10/1/18	509	431,353	580			
9/1/18	184	418,072	581			
8/1/18	265	381,870	514			
7/1/18	655	410,017	552			
6/1/18	661	407,423	567			
5/1/18	560	437,973	589			
4/1/18	1,040	342,146	477			
3/1/18	710	426,677	574			
2/1/18	313	394,427	587			

**Table IV**  
**Wheelabrator Shasta Energy Company**  
**Estimated SO<sub>2</sub> Emissions from Creosote Treated Wood (CTW)**  
**and Cardboard**

Month	CTW and Paper Dry tons	% Sulfur	Estimated SO <sub>2</sub> Emissions, tons
January	0	NA	0.0
February	0	NA	0.0
March			
April			
May			
June			
July			
August			
September			
October			
November			
December			
YTD	0		0.0

Conversion Factor - 0.6 lb SO<sub>2</sub>/lb S input

[illegible]

**Table VI**  
**Wheelabrator Shasta Energy Company**  
**CEMS Downtime**

**Note:** This report shows downtime for gas analyzers at the 1-hour level and opacity monitors at the 6-minute level

Monitor	Time O/S	Time I/S	Parameter and Reason
1	2/3/20 1:30 PM	2/3/20 3:23 PM	OPAC - Check monitor path length
2	2/5/20 6:00 AM	2/6/20 10:59 AM	NOXR - OOC Cal - replaced process flow chambers and filters, ran cal
2	2/5/20 6:00 AM	2/6/20 10:59 AM	COR - OOC Cal - replaced process flow chambers and filters, ran cal
1	2/5/20 10:00 AM	2/5/20 1:59 PM	NOXR - Quarterly preventative maintenance checks
1	2/5/20 10:00 AM	2/5/20 1:59 PM	COR - Quarterly preventative maintenance checks
1	2/5/20 10:00 AM	2/5/20 1:59 PM	COM - Quarterly preventative maintenance checks
2	2/5/20 10:00 AM	2/5/20 1:59 PM	COM - Quarterly preventative maintenance checks
2	2/5/20 10:42 AM	2/5/20 1:59 PM	OPAC - Quarterly preventative maintenance checks
3	2/5/20 10:42 AM	2/5/20 1:59 PM	OPAC - Quarterly preventative maintenance checks
1	2/5/20 10:48 AM	2/5/20 1:59 PM	OPAC - Quarterly preventative maintenance checks
2	2/6/20 6:00 AM	2/6/20 10:59 AM	COM - OOC Cal - replaced process flow chambers and filters, ran cal
1	2/17/20 11:00 AM	2/17/20 1:59 PM	NOXR - Checked hot and cold scrubbers, NOx converter and replaced several filters, ran cal
1	2/17/20 11:00 AM	2/17/20 1:59 PM	COR - Checked hot and cold scrubbers, NOx converter and replaced several filters, ran cal
1	2/17/20 11:00 AM	2/17/20 1:59 PM	COM - Checked hot and cold scrubbers, NOx converter and replaced several filters, ran cal
2	2/17/20 11:00 AM	2/17/20 11:59 AM	NOXR - Checked hot and cold scrubbers, NOx converter and replaced several filters, ran cal
2	2/17/20 11:00 AM	2/17/20 11:59 AM	COR - Checked hot and cold scrubbers, NOx converter and replaced several filters, ran cal
1	2/18/20 9:00 AM	2/18/20 9:59 AM	NOXR - Quarterly Audit
1	2/18/20 9:00 AM	2/18/20 9:59 AM	COR - Quarterly Audit
1	2/18/20 9:00 AM	2/18/20 9:59 AM	COM - Quarterly Audit
2	2/18/20 12:00 PM	2/18/20 4:59 PM	NOXR - Quarterly Audit
2	2/18/20 12:00 PM	2/18/20 4:59 PM	COR - Quarterly Audit
3	2/18/20 1:00 PM	2/18/20 3:47 PM	OPAC - Quarterly Audit
1	2/18/20 3:00 PM	2/18/20 3:59 PM	NOXR - Quarterly Audit
1	2/18/20 3:00 PM	2/18/20 3:59 PM	COR - Quarterly Audit
1	2/18/20 3:00 PM	2/18/20 3:59 PM	COM - Quarterly Audit
1	2/18/20 4:06 PM	2/18/20 6:05 PM	OPAC - Quarterly Audit
2	2/19/20 8:54 AM	2/19/20 11:41 AM	OPAC - Quarterly Audit
2	2/20/20 10:12 AM	2/20/20 11:17 AM	OPAC - Check and adjust alignment, ran cal

The abbreviations for the parameters are:

NOXR      NOx ppm @ 3% O2 for Condition 5d reporting  
COR        CO ppm @ 3% O2 for Condition 5e reporting  
COM        CO ppm @ 3% O2 for Condition 95 reporting (Boiler MACT)  
OPAC       % Opacity







DELIVERED by: Email

April 20, 2020

Mr. Paul Hellman  
Air Pollution Control Officer  
Air Quality Management District  
1855 Placer Street  
Redding, CA 96001

**Subject: Wheelabrator Shasta Energy Company Emissions Report for the Month of March 2020, Title V Operating Permit 86-VP-08h and Permits to Operate No. 86-PO-08o and 89-PO-04f.**

Dear Mr. Hellman:

Attached you will find the March 2020 Emissions Report for our wood fired power plant. The report consists of the following tables.

Table I – 30-Day Rolling Averages for CO and NOx Emissions  
Table II – Daily Hours of Operation for the Facility  
Table III – 12-Month Capacity Utilization for Wood & Natural Gas  
Table IV – Monthly Railroad Tie Usage & Associated Estimated SO2 Emissions  
Table V – NOx and CO Emissions During Startup and Shutdown  
Table VI – CEMS Downtime  
Table VII – Emission Exceedances & 6-Minute Block Opacity Averages > 20%

The CEMS were in service the entire month while the facility was operating except during periods of daily calibration and the periods of maintenance or malfunction, as listed in Table VI.

The steam generated during the month of March is given below.

Boiler #1 0.822E+8 pounds  
Boiler #2 0.793E+8 pounds  
Boiler #3 0.802E+8 pounds

Fuel stored off-site at the end of March is listed below. Off-site fuel storage should end by Indefinite.

Peterson Yard - 19195 Latona Rd., Anderson CA - 0.0 bone dry tons  
Burney Yard - Hwy 299, Burney CA - 13,018.0 bone dry tons

Based upon information and belief formed after reasonable inquiry, I am certifying that the statements and information in this report are true, accurate, and complete. If you have any questions please contact Derrick Boom at (530) 339-7627.

Sincerely,

Bryan Booth  
Plant Manager

enc    Tables I through Table VII  
         Fuel Sampling Results  
         Fuel Pile Survey Results  
         Quarterly CGA and Opacity Audit Reports

**WHEELABRATOR SHASTA ENERGY  
CONTINUOUS MONITORING AND REPORTING  
TABLE I - NOx and CO 30 DAY Rolling Averages**

Date	Boiler 1			Boiler 2			Boiler 3		
	NOx @ 3% O2 ppm	NOx lb/MMBtu	CO @ 3% O2 ppm	NOx @ 3% O2 ppm	NOx lb/MMBtu	CO @ 3% O2 ppm	NOx @ 3% O2 ppm	NOx lb/MMBtu	CO @ 3% O2 ppm
3/1/20	113	0.145	329	114	0.146	358	114	0.146	283
3/2/20	113	0.145	327	114	0.146	353	114	0.146	288
3/3/20	113	0.145	320	114	0.146	346	114	0.146	292
3/4/20	113	0.145	317	114	0.146	343	114	0.146	289
3/5/20	113	0.145	313	114	0.146	340	114	0.146	288
3/6/20	113	0.145	306	114	0.146	334	114	0.147	286
3/7/20	113	0.145	304	114	0.146	332	114	0.147	290
3/8/20	113	0.145	302	114	0.146	330	114	0.147	296
3/9/20	113	0.145	303	114	0.146	327	114	0.147	304
3/10/20	113	0.145	293	114	0.146	319	114	0.147	307
3/11/20	113	0.146	273	114	0.146	305	114	0.147	313
3/12/20	113	0.146	266	114	0.146	288	114	0.147	313
3/13/20	113	0.146	255	114	0.146	272	114	0.147	310
3/14/20	113	0.146	247	114	0.146	264	114	0.147	312
3/15/20	113	0.146	243	114	0.146	254	114	0.147	315
3/16/20	113	0.146	236	114	0.146	250	114	0.147	317
3/17/20	113	0.146	233	114	0.146	243	114	0.147	317
3/18/20	113	0.145	230	114	0.146	237	114	0.147	317
3/19/20	113	0.146	231	114	0.146	236	114	0.147	317
3/20/20	113	0.146	218	114	0.146	223	114	0.147	313
3/21/20	113	0.146	213	114	0.146	213	114	0.147	308
3/22/20	113	0.146	212	114	0.146	206	115	0.147	302
3/23/20	113	0.146	205	114	0.146	196	115	0.147	297
3/24/20	113	0.146	201	114	0.146	189	114	0.147	296
3/25/20	113	0.146	196	114	0.146	182	114	0.147	281
3/26/20	113	0.146	192	114	0.146	177	114	0.147	279
3/27/20	113	0.146	191	114	0.146	175	114	0.147	279
3/28/20	113	0.146	194	114	0.146	176	114	0.147	278
3/29/20	113	0.146	200	114	0.146	177	114	0.147	277
3/30/20	113	0.146	203	114	0.146	180	114	0.147	277
3/31/20	113	0.146	205	114	0.146	181	114	0.147	277

**Table II**  
**Wheelabrator Shasta Energy Company**  
**Boiler Hours**

Date	Boiler 1	Boiler 2	Boiler 3
3/1/20	24.0	24.0	24.0
3/2/20	24.0	24.0	24.0
3/3/20	24.0	24.0	24.0
3/4/20	24.0	24.0	24.0
3/5/20	24.0	24.0	24.0
3/6/20	24.0	24.0	24.0
3/7/20	24.0	24.0	24.0
3/8/20	24.0	24.0	24.0
3/9/20	24.0	24.0	24.0
3/10/20	24.0	24.0	24.0
3/11/20	24.0	24.0	24.0
3/12/20	24.0	24.0	24.0
3/13/20	24.0	24.0	24.0
3/14/20	24.0	24.0	24.0
3/15/20	24.0	24.0	24.0
3/16/20	24.0	24.0	24.0
3/17/20	24.0	24.0	24.0
3/18/20	24.0	24.0	24.0
3/19/20	24.0	24.0	24.0
3/20/20	24.0	24.0	24.0
3/21/20	24.0	24.0	24.0
3/22/20	24.0	24.0	24.0
3/23/20	24.0	24.0	24.0
3/24/20	24.0	24.0	24.0
3/25/20	24.0	24.0	24.0
3/26/20	24.0	24.0	24.0
3/27/20	24.0	24.0	24.0
3/28/20	24.0	24.0	24.0
3/29/20	24.0	24.0	24.0
3/30/20	24.0	24.0	24.0
3/31/20	24.0	24.0	24.0
Total Hours	744.0	744.0	744.0

**TABLE III**  
**ANNUAL CAPACITY FACTOR**  
**WHEELABRATOR SHASTA ENERGY**  
**(PERMITTED CAPACITY 1,017 MMBTU / HR)**

			Monthly Average	Annual Capacity	Annual Capacity	Annual Capacity
Month / Year	Natural Gas	Wood	Heat Input	Factor	Factor	Factor Total
	MMBTU	MMBTU	MMBTU / HR	Natural Gas	Wood	Fuels
3/1/20	12	425,570	572	0.16%	58.3%	58.4%
2/1/20	512	390,266	561	0.16%	55.5%	55.7%
1/1/20	27	428,160	576	0.28%	55.2%	55.4%
12/1/19	385	432,444	582	0.31%	55.9%	56.2%
11/1/19	435	440,834	613	0.31%	56.7%	57.1%
10/1/19	330	413,390	556	0.32%	55.6%	55.9%
9/1/19	16	455,492	633	0.33%	55.8%	56.1%
8/1/19	5,696	340,640	466	0.33%	55.3%	55.7%
7/1/19	29	514,032	691	0.27%	55.8%	56.1%
6/1/19	1,346	416,668	581	0.27%	54.6%	54.9%
5/1/19	825	481,310	648	0.27%	54.5%	54.8%
4/1/19	4,646	453,571	636	0.26%	54.1%	54.3%
3/1/19	0	178,080	239	0.22%	52.8%	53.0%
2/1/19	10,964	360,447	553	0.23%	55.6%	55.8%
1/1/19	3,361	495,225	670			
12/1/18	402	505,823	680			
11/1/18	1,258	335,814	468			
10/1/18	509	431,353	580			
9/1/18	184	418,072	581			
8/1/18	265	381,870	514			
7/1/18	655	410,017	552			
6/1/18	661	407,423	567			
5/1/18	560	437,973	589			
4/1/18	1,040	342,146	477			
3/1/18	710	426,677	574			

**Table IV**  
**Wheelabrator Shasta Energy Company**  
**Estimated SO2 Emissions from Creosote Treated Wood (CTW)**  
**and Cardboard**

Month	CTW and Paper Dry tons	% Sulfur	Estimated SO2 Emissions, tons
January	0	NA	0.0
February	0	NA	0.0
March	0	NA	0.0
April			
May			
June			
July			
August			
September			
October			
November			
December			
YTD	0		0.0

Conversion Factor - 0.6 lb SO2/lb S input

## CONTINUOUS MONITORING AND REPORTING

### No Startup, Shutdown or Malfunction emissions to Report

[illegible]

**Note:** This report shows downtime for gas analyzers at the 1-hour level and opacity monitors at the 6-minute level

The abbreviations for the parameters are:

OPAC      % Opacity

**There were no emission exceedances this month**





DELIVERED by: Email

May 21, 2020

Mr. Paul Hellman  
Air Pollution Control Officer  
Air Quality Management District  
1855 Placer Street  
Redding, CA 96001

**Subject: Wheelabrator Shasta Energy Company Emissions Report for the Month of April 2020, Title V Operating Permit 86-VP-08h and Permits to Operate No. 86-PO-08o and 89-PO-04f.**

Dear Mr. Hellman:

Attached you will find the April 2020 Emissions Report for our wood fired power plant. The report consists of the following tables.

Table I – 30-Day Rolling Averages for CO and NOx Emissions  
Table II – Daily Hours of Operation for the Facility  
Table III – 12-Month Capacity Utilization for Wood & Natural Gas  
Table IV – Monthly Railroad Tie Usage & Associated Estimated SO2 Emissions  
Table V – NOx and CO Emissions During Startup and Shutdown  
Table VI – CEMS Downtime  
Table VII – Emission Exceedances & 6-Minute Block Opacity Averages > 20%

The CEMS were in service the entire month while the facility was operating except during periods of daily calibration and the periods of maintenance or malfunction, as listed in Table VI.

The steam generated during the month of April is given below.

Boiler #1 0.161E+8 pounds  
Boiler #2 0.991E+8 pounds  
Boiler #3 1.095E+8 pounds

Fuel stored off-site at the end of April is listed below. Off-site fuel storage should end by Indefinite.

Peterson Yard - 19195 Latona Rd., Anderson CA - 0.0 bone dry tons  
Burney Yard - Hwy 299, Burney CA - 13,018.0 bone dry tons

Based upon information and belief formed after reasonable inquiry, I am certifying that the statements and information in this report are true, accurate, and complete. If you have any questions please contact Derrick Boom at (530) 339-7627.

Sincerely,

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

Bryan Booth  
Plant Manager

enc Tables I through Table VII  
Fuel Sampling Results  
Fuel Pile Survey Results

**WHEELABRATOR SHASTA ENERGY  
CONTINUOUS MONITORING AND REPORTING  
TABLE I - NOx and CO 30 DAY Rolling Averages**

[illegible]

**Table II**  
**Wheelabrator Shasta Energy Company**  
**Boiler Hours**

Date	Boiler 1	Boiler 2	Boiler 3
4/1/20	24.0	24.0	24.0
4/2/20	24.0	24.0	24.0
4/3/20	24.0	20.5	24.0
4/4/20	24.0	24.0	24.0
4/5/20	17.5	24.0	24.0
4/6/20	24.0	24.0	24.0
4/7/20	6.0	23.7	23.7
4/8/20	0.0	24.0	24.0
4/9/20	0.0	24.0	24.0
4/10/20	0.0	24.0	24.0
4/11/20	0.0	24.0	24.0
4/12/20	0.0	24.0	24.0
4/13/20	0.0	24.0	24.0
4/14/20	0.0	24.0	24.0
4/15/20	0.0	24.0	24.0
4/16/20	0.0	24.0	24.0
4/17/20	0.0	24.0	24.0
4/18/20	0.0	24.0	24.0
4/19/20	0.0	24.0	24.0
4/20/20	0.0	24.0	24.0
4/21/20	0.0	24.0	24.0
4/22/20	0.0	24.0	24.0
4/23/20	0.0	24.0	24.0
4/24/20	0.0	24.0	24.0
4/25/20	0.0	24.0	24.0
4/26/20	0.0	24.0	24.0
4/27/20	0.0	24.0	24.0
4/28/20	0.0	24.0	24.0
4/29/20	0.0	24.0	24.0
4/30/20	0.0	24.0	24.0
Total Hours	143.5	716.2	719.6

**TABLE III**  
**ANNUAL CAPACITY FACTOR**  
**WHEELABRATOR SHASTA ENERGY**  
**(PERMITTED CAPACITY 1,017 MMBTU / HR)**

			Monthly Average	Annual Capacity	Annual Capacity	Annual Capacity
Month / Year	Natural Gas	Wood	Heat Input	Factor	Factor	Factor Total
	MMBTU	MMBTU	MMBTU / HR	Natural Gas	Wood	Fuels
4/1/20	2,073	394,231	550	0.13%	57.6%	57.7%
3/1/20	12	425,570	572	0.16%	58.3%	58.4%
2/1/20	512	390,266	561	0.16%	55.5%	55.7%
1/1/20	27	428,160	576	0.28%	55.2%	55.4%
12/1/19	385	432,444	582	0.31%	55.9%	56.2%
11/1/19	435	440,834	613	0.31%	56.7%	57.1%
10/1/19	330	413,390	556	0.32%	55.6%	55.9%
9/1/19	16	455,492	633	0.33%	55.8%	56.1%
8/1/19	5,696	340,640	466	0.33%	55.3%	55.7%
7/1/19	29	514,032	691	0.27%	55.8%	56.1%
6/1/19	1,346	416,668	581	0.27%	54.6%	54.9%
5/1/19	825	481,310	648	0.27%	54.5%	54.8%
4/1/19	4,646	453,571	636	0.26%	54.1%	54.3%
3/1/19	0	178,080	239	0.22%	52.8%	53.0%
2/1/19	10,964	360,447	553			
1/1/19	3,361	495,225	670			
12/1/18	402	505,823	680			
11/1/18	1,258	335,814	468			
10/1/18	509	431,353	580			
9/1/18	184	418,072	581			
8/1/18	265	381,870	514			
7/1/18	655	410,017	552			
6/1/18	661	407,423	567			
5/1/18	560	437,973	589			
4/1/18	1,040	342,146	477			

**Table IV**  
**Wheelabrator Shasta Energy Company**  
**Estimated SO2 Emissions from Creosote Treated Wood (CTW)**  
**and Cardboard**

Month	CTW and Paper Dry tons	% Sulfur	Estimated SO2 Emissions, tons
January	0	NA	0.0
February	0	NA	0.0
March	0	NA	0.0
April	0	NA	0.0
May			
June			
July			
August			
September			
October			
November			
December			
YTD	0		0.0

Conversion Factor - 0.6 lb SO2/lb S input

[illegible]

**Table VI**  
**Wheelabrator Shasta Energy Company**  
**CEMS Downtime**

**Note:** This report shows downtime for gas analyzers at the 1-hour level and opacity monitors at the 6-minute level

Monitor	Time O/S	Time I/S	Parameter and Reason
3	4/3/20 9:00 AM	4/3/20 10:59 AM	NOXR - Cold scrubber leak repaired, ran cal
3	4/3/20 9:00 AM	4/3/20 10:59 AM	COR - Cold scrubber leak repaired, ran cal
3	4/3/20 9:00 AM	4/3/20 10:59 AM	COM - Cold scrubber leak repaired, ran cal
2	4/13/20 9:54 AM	4/13/20 10:23 AM	OPAC - Cleaned reflector lense, ran cal
2	4/23/20 8:00 AM	4/23/20 10:59 AM	NOXR - Changed media in cold and hot scrubbers, ran cal
2	4/23/20 8:00 AM	4/23/20 10:59 AM	COR - Changed media in cold and hot scrubbers, ran cal
2	4/23/20 8:00 AM	4/23/20 10:59 AM	COM - Changed media in cold and hot scrubbers, ran cal
3	4/23/20 12:00 PM	4/23/20 12:59 PM	NOXR - Changed media in cold and hot scrubbers, ran cal
3	4/23/20 12:00 PM	4/23/20 12:59 PM	COR - Changed media in cold and hot scrubbers, ran cal
3	4/23/20 12:00 PM	4/23/20 12:59 PM	COM - Changed media in cold and hot scrubbers, ran cal
3	4/27/20 7:00 AM	4/27/20 9:59 AM	NOXR - Changed hot scrubber gasket, ran cal
3	4/27/20 7:00 AM	4/27/20 9:59 AM	COR - Changed hot scrubber gasket, ran cal
3	4/27/20 7:00 AM	4/27/20 9:59 AM	COM - Changed hot scrubber gasket, ran cal
2	4/29/20 8:00 AM	4/30/20 9:59 AM	NOXR - OOC - Clean O2 sensor filter, ran cal
2	4/29/20 8:00 AM	4/30/20 9:59 AM	COR - OOC - Clean O2 sensor filter, ran cal
2	4/30/20 6:00 AM	4/30/20 9:59 AM	COM - OOC - Clean O2 sensor filter, ran cal
3	4/30/20 7:00 AM	4/30/20 7:05 AM	OPAC - Quality assurance calibration
3	4/30/20 7:00 AM	4/30/20 8:59 AM	NOXR - Changed particulate filter, ran cal
3	4/30/20 7:00 AM	4/30/20 8:59 AM	COR - Changed particulate filter, ran cal
3	4/30/20 7:00 AM	4/30/20 8:59 AM	COM - Changed particulate filter, ran cal

The abbreviations for the parameters are:

NOXR      NOx ppm @ 3% O2 for Condition 5d reporting  
COR        CO ppm @ 3% O2 for Condition 5e reporting  
COM        CO ppm @ 3% O2 for Condition 95 reporting (Boiler MACT)  
OPAC       % Opacity

**There were no emission exceedances this month**



**PACIFIC GAS AND ELECTRIC COMPANY**

**ATTACHMENT 3**

**Burney Forest Products Air Quality Attestation**

**APPENDIX C**  
**AIR QUALITY ATTESTATION**

[VIA ELECTRONIC SUBMISSION]



June 2, 2020

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 November 1, 2019 and ending April 30, 2020. 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	Billy Dillard
Signature	
Title	Plant Manager
Date	June 2, 2020

# **PACIFIC GAS AND ELECTRIC COMPANY**

## **ATTACHMENT 4**

### **Burney Forest Products Compliance Certification Reports**



May 21, 2020

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**  
**Title V Operating Permit # 87-TV-27n**  
**Burney Forest Products**

Dear Ms. Welch

In accordance with Conditions 23 of the referenced permit, enclosed please find Burney Forest Product's completed Semi-Annual Monitoring Report. This submittal covers the time period from October 14, 2019 through April 13, 2020 reporting period.

If you have any questions or require additional information, please do not hesitate to contact me at 530-335-5023.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bill Dillard', with a long horizontal line extending to the right.

Bill Dillard,  
Plant Manager, Burney Forest Products

Enclosures

cc: John Christian, Olympus Power (email)  
File 201-40-09

# CERTIFICATION REPORT

## (FORM 5-K1)

<b>DISTRICT:</b> Shasta County AQMD	<b>&lt; DISTRICT USE ONLY =</b>
	<b>DISTRICT ID:</b>
<b>COMPANY NAME:</b> Burney Forest Products, a Joint Venture	<b>FACILITY NAME:</b> Burney Forest Products

### I. FACILITY INFORMATION

1. Company Name: Burney Forest Products, a Joint Venture
2. Facility Name (if different than Company Name): Burney Forest Products
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-27n

### II. GENERAL INFORMATION

1. Reporting period (specify dates): October 14, 2019 through April 13, 2020
2. Due date for submittal of report: May 28, 2020
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)

<b>DISTRICT:</b> Shasta County AQMD	<b>&lt; DISTRICT USE ONLY =</b>
	<b>DISTRICT ID:</b>
<b>COMPANY NAME:</b> Burney Forest Products, a Joint Venture	<b>FACILITY NAME:</b> Burney Forest Products

### IV. COMPLIANCE SCHEDULE PROGRESS INFORMATION

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

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

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

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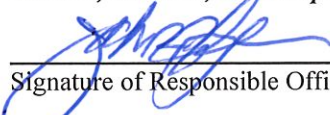
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### V. COMPLIANCE CERTIFICATION

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.*

  
\_\_\_\_\_  
Signature of Responsible Official

5-20-2020  
\_\_\_\_\_  
Date

John Christian  
\_\_\_\_\_  
Print Name of Responsible Official

Asset Manager, Burney Forest Products  
\_\_\_\_\_  
Title of Responsible Official and Company Name

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

# DEVIATION REPORT (FORM 5-L)

<b>DISTRICT:</b> Shasta County AQMD	<div style="text-align: center; background-color: #f2f2f2; padding: 2px;">         &lt; DISTRICT USE ONLY =       </div> <b>DISTRICT ID:</b>
<b>COMPANY NAME:</b> Burney Forest Products, a Joint Venture	<b>FACILITY NAME:</b> Burney Forest Products

## I. DEVIATION INFORMATION

1. Permit number(s) of emission unit or control unit affected: 87-TV-27n
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 # 1 ESP TR-1B.
5. Date and time when deviation was discovered: February 13, 2020 at approximately 10:56; Reported to the District on February 13, 2020 at 12:00 hours. Was shut down for repairs on February 14, 2020 about 9 am.
6. Date, time and duration of deviation: February 13, 2020 at approximately 02:45 hours. Duration was approximately 22 hours.
7. Probable cause of deviation: At around 10:56 hours, the Plant Equipment Operator (PEO) noticed Boiler #1 ESP TR-1B shut off and didn't restart. The cause was that one or more plates were out of place in the ESP. Despite running without this ESP zone, no excess emissions were observed.
8. Preventive or corrective action taken: BFP determined that a shutdown was necessary in order to correct and repair the non-starting TR-1B zone, and shut down Boiler #1 and ESP#1 for repairs on February 14, 2020. Repairs were made, TR-1B became functional and the boiler was started back up on February 15, 2020.



# DEVIATION REPORT

## (FORM 5-L)

<b>DISTRICT:</b> Shasta County AQMD	<div style="text-align: center; border-bottom: 1px solid black; margin-bottom: 5px;">         &lt; DISTRICT USE ONLY =       </div> <b>DISTRICT ID:</b>
<b>COMPANY NAME:</b> Burney Forest Products, a Joint Venture	<b>FACILITY NAME:</b> Burney Forest Products

### I. DEVIATION INFORMATION

1. Permit number(s) of emission unit or control unit affected: 87-TV-27n
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4. Associated equipment and equipment operation (if any): Boiler # 1 ESP TR-1B.
5. Date and time when deviation was discovered: March 3, 2020 at approximately 07:00 hours; Reported to the District on March 3, 2020 at 18:09 hours.
6. Date, time and duration of deviation: March 3, 2020 at approximately 07:00 hours, until approximately 11:39 when the boiler began to be shut down. Duration was approximately 4.70 hours.
7. Probable cause of deviation: At around 10:56 hours, the Plant Equipment Operator (PEO) noticed Boiler #1 ESP TR-1B shut off and didn't restart. The cause was that one or more plates were out of place in the ESP. Despite running without this ESP zone, no excess emissions were observed.
8. Preventive or corrective action taken: BFP determined that a shutdown was necessary in order to correct and repair the non-starting TR-1B zone, and shut down Boiler #1 and ESP#1 for repairs on March 3, 2020. Repairs were made, TR-1B became functional and the boiler was started back up on March 5, 2020 at approximately 0:00.



December 23, 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 – Nov 2019**  
**Burney Forest Products**

Dear Ms. Welch,

Pursuant to Title V Operating Permit 87-TV-27m, Condition 20, enclosed please find the November 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,

Kraig Strauch  
Plant Manager

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

File: 201-40-03

**BURNEY FOREST PRODUCTS**  
**Monthly Emissions Report**  
**Nov 2019**

<b>EXCESS EMISSION SUMMARY</b>			
<b>Parameter</b>	<b>Limit</b>	<b>Averaging Period</b>	<b>Excursions</b>
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

<b>CEMS/COMS DOWNTIME PERIODS</b>	
<b>NOx</b>	
Boiler 1	None
Boiler 2	None
<b>CO</b>	
Boiler 1	None
Boiler 2	None
<b>CO2</b>	
Boiler 1	None
Boiler 2	None
<b>O2</b>	
Boiler 1	None
Boiler 2	None
<b>OPACITY</b>	
Boiler 1	None
Boiler 2	None

OPERATING DATA	
<b>Ammonia Usage (Pounds)</b>	
Boiler 1	42,109
Boiler 2	46,437
Total Both Boilers	88,546
<b>Boiler Operating Time (Hours)</b>	
Boiler 1	674
Boiler 2	655

BOILER OFF LINE TIMES				
<b>Boiler 1</b>				
Boiler Off line		Boiler On line		Cause
Date	Time off	Date	Time on	
10/31/19	13:42	11/02/19	20:24	PG&E Requested Outage – Black Plant
11/25/19	03:43	11/25/19	05:13	Boiler offline due to turbine trip
<b>Boiler 2</b>				
Boiler Off line		Boiler On line		Cause
Date	Time off	Date	Time on	
10/31/19	16:42	11/02/19	21:42	PG&E Requested Outage – Black Plant
11/3/19	07:17	11/3/19	07:50	Boiler offline due to turbine trip
11/3/19	14:34	11/4/19	08:44	Boiler offline due to superheater safety trip
11/25/19	03:43	11/25/19	04:48	Boiler offline due to turbine trip

Note: Boiler Off Line Times are in Pacific time



January 25, 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 – Dec 2019**  
**Burney Forest Products**

Dear Ms. Welch,

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

In addition, Variance 19-V-02 was approved on October 17, 2019 to provide a variance to BFP's permitted calendar year CO emissions limit of 1090 tons, a variance emissions report has also been included in this monthly report.

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 black ink, appearing to read 'Kraig Strauch', with a horizontal line drawn underneath.

Kraig Strauch  
Plant Manager

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

File: 201-40-03



**BURNEY FOREST PRODUCTS**  
**Monthly Emissions Report**  
**Dec 2019**

<b>EXCESS EMISSION SUMMARY</b>			
<b>Parameter</b>	<b>Limit</b>	<b>Averaging Period</b>	<b>Excursions</b>
CO – Gas	400 ppm@3% O <sub>2</sub>	24-hr Block Avg (Calendar Day)	None
CO - Wood	1,200 ppm@12% CO <sub>2</sub>	24-hr Block Avg (Calendar Day)	None
NO <sub>x</sub> – Gas	70 ppm@3% O <sub>2</sub>	3-hr Block Avg	None
NO <sub>x</sub> – Gas	0.084 lb/mmBtu	3-hr Block Avg	None
NO <sub>x</sub> – Wood	0.12 lb/mmBtu	3-hr Block Avg	None
NO <sub>x</sub> – Mixed Fuel – Boiler 1	0.147 lb/mmBtu	3-hr Block Avg	None
NO <sub>x</sub> – Mixed Fuel – Boiler 2	0.147 lb/mmBtu	3-hr Block Avg	None
NO <sub>x</sub> – All Fuels	57.4 lb/hr (both boilers combined)	1-hr Total	None
NO <sub>x</sub> – All Fuels	250 ppm@12% CO <sub>2</sub>	1-hr Avg	None
Opacity	20%	6-min Avg	None
Opacity	40%	3-min aggr./hr	None

<b>CEMS/COMS DOWNTIME PERIODS</b>	
<b>NO<sub>x</sub></b>	
Boiler 1	On 12/17/2019: One (1) hour of downtime to perform preventive maintenance.
Boiler 2	On 12/17/2019: One (1) hour of downtime to perform preventive maintenance.
Boiler 2	On 12/25/2019: Two (2) hours of downtime due to a valve in the sampling system failing and causing a malfunction in the sample collection and preventing an automatic calibration to be able to be performed (causing it to fail). The Boiler was shut down immediately. The valve was repaired prior to restarting the boiler.
<b>CO</b>	
Boiler 1	On 12/7/2019: One (1) hour of downtime due to PG&E line trip.
Boiler 1	On 12/17/2019: One (1) hour of downtime to perform preventative maintenance.
Boiler 2	On 12/17/2019: One (1) hour of downtime to perform preventive maintenance.
Boiler 2	On 12/25/2019: Two (2) hours of downtime due to a valve in the sampling system failing and causing a malfunction in the sample collection and preventing an automatic calibration to be able to be performed (causing it to fail). The Boiler was shut down immediately. The valve was repaired prior to restarting the boiler.
<b>CO<sub>2</sub></b>	
Boiler 1	On 12/17/2019: One (1) hour of downtime to perform preventive maintenance.
Boiler 2	On 12/17/2019: One (1) hour of downtime to perform preventive maintenance.
Boiler 2	On 12/25/2019: Two (2) hours of downtime due to a valve in the sampling system failing and causing a malfunction in the sample collection and preventing an automatic calibration

CEMS/COMS DOWNTIME PERIODS	
	to be able to be performed (causing it to fail). The Boiler was shut down immediately. The valve was repaired prior to restarting the boiler.
<b>O2</b>	
Boiler 1	On 12/17/2019: One (1) hour of downtime to perform preventive maintenance.
Boiler 2	On 12/17/2019: One (1) hour of downtime to perform preventive maintenance.
Boiler 2	On 12/25/2019: Two (2) hours of downtime due to a valve in the sampling system failing and causing a malfunction in the sample collection. This prevented an automatic calibration to be able to be performed (causing it to fail). The Boiler was shut down immediately. The valve was repaired prior to restarting the boiler.
<b>OPACITY</b>	
Boiler 1	On 12/7/19: Seven six-minute periods (42-minutes) of downtime due to loss of power from PG&E, causing communications issues.
Boiler 1	On 12/16/19: Five six-minute periods (30-minutes) of downtime to perform the quarterly opacity audit.
Boiler 1	On 12/17/19: Fourteen six-minute periods (84-minutes) of downtime to perform quality assurance testing (CGA) on CEMS.
Boiler 2	On 12/16/19: Seven six-minute periods (30-minutes) of downtime to perform the quarterly opacity audit.
Boiler 2	On 12/17/19: Fourteen six-minute periods (84-minutes) of downtime to perform quality assurance testing (CGA) on CEMS.

OPERATING DATA	
<b>Ammonia Usage (Pounds)</b>	
Boiler 1	24,976
Boiler 2	26,733
Total Both Boilers	51,709
<b>Boiler Operating Time (Hours)</b>	
Boiler 1	633
Boiler 2	581

BOILER OFF LINE TIMES				
<b>Boiler 1</b>				
Boiler Off line		Boiler On line		Cause
Date	Time off	Date	Time on	
12/7/19	14:34	12/7/19	16:56	Boiler offline due to PG&E line trip–
12/27/19	10:42	1/13/20	05:13	Boiler offline to conserve fuel
<b>Boiler 2</b>				
Boiler Off line		Boiler On line		Cause
Date	Time off	Date	Time on	
12/7/19	14:43	12/7/19	17:30	Boiler offline due to PG&E line trip
12/25/19	08:09	1/8/20	22:55	Boiler offline to conserve fuel

Note: Boiler Off Line Times are in Pacific time

**BURNEY FOREST PRODUCTS**  
**Variance Emissions Report**  
**Dec 2019**

Burney Forest Products (BFP) is submitting this report in accordance with 19-V-02, dated October 17, 2019, which provided a variance for the 2019 calendar year carbon monoxide mass emission limit found in District Permit 87-PO-27k, Condition 21.e.

BFP reduced emissions to the maximum extent feasible, a summary of the status of BFP's CO emissions for 2019 is as follows:

BFP Total CO Calendar Year Emissions Limit: 1090 tons  
BFP Total CO Emissions in 2019: 1070 tons  
BFP Total Excess CO Emissions in 2019: 0 tons

Even though BFP was able to successfully complete the year within the permitted limit, BFP very much appreciates the efforts made by Shasta County Air Quality Board members and Shasta County Air Quality Management District to provide this variance to BFP in 2019.





February 26, 2020

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 – Jan 2020**  
**Burney Forest Products**

Dear Ms. Welch,

Pursuant to Title V Operating Permit 87-TV-27m, Condition 20, enclosed please find the January 2020 *Monthly Emissions Report* for Burney Forest Products (BFP).

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 black ink, appearing to read 'Bill Dillard', with a long horizontal line extending to the right.

Bill Dillard  
Plant Manager

Cc: John Christian (email)

File: 201-40-03

**BURNEY FOREST PRODUCTS**  
**Monthly Emissions Report**  
**Jan 2020**

<b>EXCESS EMISSION SUMMARY</b>			
<b>Parameter</b>	<b>Limit</b>	<b>Averaging Period</b>	<b>Excursions</b>
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

<b>CEMS/COMS DOWNTIME PERIODS</b>	
<b>NOx</b>	
Boiler 1	On 1/16/2020: One (1) hour of downtime to perform preventative maintenance.
Boiler 2	On 1/16/2020: One (1) hour of downtime to perform preventative maintenance.
<b>CO</b>	
Boiler 1	On 1/16/2020: One (1) hour of downtime to perform preventative maintenance.
Boiler 2	On 1/16/2020: One (1) hour of downtime to perform preventative maintenance.
<b>CO2</b>	
Boiler 1	On 1/16/2020: One (1) hour of downtime to perform preventative maintenance.
Boiler 2	On 1/16/2020: One (1) hour of downtime to perform preventative maintenance.
<b>O2</b>	
Boiler 1	On 1/16/2020: One (1) hour of downtime to perform preventative maintenance.
Boiler 2	On 1/16/2020: One (1) hour of downtime to perform preventative maintenance.
<b>OPACITY</b>	
Boiler 1	None
Boiler 2	None

OPERATING DATA	
<b>Ammonia Usage (Pounds)</b>	
Boiler 1	36,486
Boiler 2	44,420
Total Both Boilers	80,906
<b>Boiler Operating Time (Hours)</b>	
Boiler 1	553
Boiler 2	512

BOILER OFF LINE TIMES				
<b>Boiler 1</b>				
Boiler Off line		Boiler On line		Cause
Date	Time off	Date	Time on	
12/27/19	10:42	1/8/20	22:55	Boiler offline to conserve fuel
<b>Boiler 2</b>				
Boiler Off line		Boiler On line		Cause
Date	Time off	Date	Time on	
12/25/19	08:09	1/10/20	20:06	Boiler offline to conserve fuel

Note: Boiler Off Line Times are in Pacific time

**Wood Fuel:** Jan 2020

Day	#1 Boiler								#2 Boiler							
	Belt Scale					Average	Wood	Average	Belt Scale					Average	Wood	Average
	Reading	Hours	Average	Daily	Bone Dry	Bone Dry	Heat	Daily	Reading	Hours	Average	Daily	Bone Dry	Bone Dry	Heat	Daily
	Total Green Tons	on Wood Fuel	Green Tons/hr	Moisture %	Tons Day	Tons Per Hour	Input mmbtu/hr	Flow KPPH	Total Green Tons	on Wood Fuel	Green Tons/hr	Moisture %	Tons Day	Tons Per Hour	Input mmbtu/hr	Flow KPPH
1	0.0	0.0	0.0	0%	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0%	0.0	0.0	0.0	0.0
2	0.0	0.0	0.0	0%	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0%	0.0	0.0	0.0	0.0
3	0.0	0.0	0.0	0%	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0%	0.0	0.0	0.0	0.0
4	0.0	0.0	0.0	0%	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0%	0.0	0.0	0.0	0.0
5	0.0	0.0	0.0	0%	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0%	0.0	0.0	0.0	0.0
6	0.0	0.0	0.0	0%	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0%	0.0	0.0	0.0	0.0
7	0.0	0.0	0.0	0%	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0%	0.0	0.0	0.0	0.0
8	0.0	1.1	0.0	31%	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0%	0.0	0.0	0.0	0.0
9	350.5	24.0	14.6	40%	210.4	8.8	153.4	142.1	1.2	0.0	0.0	40%	0.7	0.0	0.0	0.0
10	776.7	24.0	32.4	44%	436.3	18.2	318.2	180.0	49.4	3.9	12.7	44%	27.8	7.1	125.1	139.9
11	691.9	24.0	28.8	45%	380.2	15.8	277.2	180.1	691.9	24.0	28.9	45%	380.2	15.9	277.8	181.3
12	656.8	24.0	27.4	43%	374.1	15.6	272.8	177.8	656.8	24.0	27.4	43%	374.1	15.6	272.8	188.6
13	670.3	24.0	27.9	42%	386.0	16.1	281.5	187.5	670.3	24.0	27.9	42%	386.0	16.1	281.5	182.3
14	633.6	24.0	26.4	43%	361.5	15.1	263.9	183.2	518.9	24.0	21.6	43%	296.0	12.3	215.9	190.6
15	489.0	24.0	20.4	43%	278.3	11.6	203.0	189.7	587.4	24.0	24.5	43%	334.4	14.0	244.3	183.5
16	464.4	24.0	19.4	42%	267.5	11.2	195.4	181.8	556.0	24.0	23.2	42%	320.2	13.3	233.5	188.2
17	445.7	23.9	18.6	42%	257.2	10.7	188.1	192.3	516.4	23.8	21.7	42%	297.9	12.5	219.1	172.9
18	427.5	24.0	17.8	45%	236.9	9.9	172.8	178.2	623.2	24.0	26.0	45%	345.4	14.4	251.9	187.1
19	452.8	24.0	18.9	43%	256.7	10.7	187.2	189.9	555.0	24.0	23.1	43%	314.7	13.1	229.4	180.6
20	422.8	24.0	17.6	43%	243.1	10.1	177.2	185.7	583.0	24.0	24.3	43%	335.2	14.0	244.4	189.7
21	466.8	24.0	19.5	43%	267.1	11.1	194.8	193.8	539.6	23.9	22.6	43%	308.7	12.9	225.9	183.3
22	502.3	24.0	20.9	43%	285.2	11.9	208.0	181.0	592.8	24.0	24.7	43%	336.6	14.0	245.4	184.9
23	548.6	24.0	22.9	45%	302.5	12.6	220.5	176.4	615.1	24.0	25.6	45%	339.1	14.1	247.3	184.4
24	605.5	24.0	25.2	46%	328.8	13.7	239.8	190.8	547.1	24.0	22.8	46%	297.1	12.4	216.6	173.5
25	585.2	24.0	24.4	43%	334.4	13.9	243.8	186.4	372.1	24.0	15.5	43%	212.6	8.9	155.0	138.9
26	550.3	24.0	22.9	47%	291.5	12.1	212.6	172.4	604.2	24.0	25.2	47%	320.1	13.3	233.4	187.2
27	576.4	24.0	24.0	49%	295.8	12.3	215.7	178.7	622.7	24.0	25.9	49%	319.5	13.3	233.0	175.9
28	531.2	24.0	22.1	46%	287.8	12.0	209.9	178.0	635.2	24.0	26.5	46%	344.2	14.3	250.9	185.3
29	595.9	24.0	24.8	48%	310.1	0.0	0.0	173.7	611.9	24.0	25.5	48%	318.4	13.3	232.2	167.6
30	521.5	24.0	21.7	43%	295.8	0.0	0.0	177.9	607.7	24.0	25.3	43%	344.7	14.4	251.4	186.4
31	566.9	24.0	23.6	45%	310.7	0.0	0.0	189.4	562.1	24.0	23.4	45%	308.0	12.8	224.6	181.2
Total	12,532	553			6,998				12,320	508			6,862			
Average							143								165	
12 Month Rolling Avg Wood/(Gas+Wood) "Db" Cap. Factor =						66%	12 Month Rolling Avg Wood/(Gas+Wood) "Db" Cap. Factr =						72%			



**Burney Forest Products  
Natural Gas Fuel:**

Jan 2020

Day	#1 Boiler						#2 Boiler						Plant Total Gas Usage MCF Day
	Hours on Gas Fuel Only	Hours on Gas Fuel Co-Fire	Gas Usage MCF Day	Average Usage Rate MCF/hr	HHV	HHV	Hours on Gas Fuel Only	Hours on Gas Fuel Co-Fire	Gas Usage MCF Day	Average Usage Rate MCF/hr	HHV	HHV	
					Gas	Gas					Gas	Gas	
					Heat Input Rate mmBtu/hr	Heat Input mmBtu					Heat Input Rate mmBtu/hr	Heat Input mmBtu	
1	0.00	0.00	0	0.0	0.0	0.0	0.00	0.00	0	0.0	0.0	0.0	0
2	0.00	0.00	0	0.0	0.0	0.0	0.00	0.00	0	0.0	0.0	0.0	0
3	0.00	0.00	0	0.0	0.0	0.0	0.00	0.00	0	0.0	0.0	0.0	0
4	0.00	0.00	0	0.0	0.0	0.0	0.00	0.00	0	0.0	0.0	0.0	0
5	0.00	0.00	0	0.0	0.0	0.0	0.00	0.00	0	0.0	0.0	0.0	0
6	0.00	0.00	0	0.0	0.0	0.0	0.00	0.00	0	0.0	0.0	0.0	0
7	0.00	0.00	0	0.0	0.0	0.0	0.00	0.00	0	0.0	0.0	0.0	0
8	0.00	1.08	22	20.5	20.8	22.6	0.00	0.00	0	0.0	0.0	0.0	22
9	0.00	24.00	977	40.7	41.3	991.3	0.00	0.00	0	0.0	0.0	0.0	977
10	0.00	24.00	1170	48.7	49.5	1187.5	3.78	3.88	235	30.6	31.1	238.2	1405
11	0.00	24.00	644	26.8	27.2	653.4	0.02	23.95	633	26.4	26.8	642.2	1276
12	0.00	24.00	473	19.7	20.0	480.3	0.00	24.00	487	20.3	20.6	494.7	961
13	0.00	24.00	372	15.5	15.7	377.9	0.00	24.00	609	25.4	25.7	618.0	981
14	0.02	23.97	842	35.1	35.6	854.6	0.00	24.00	609	25.4	25.7	617.9	1451
15	0.00	24.00	822	34.2	34.8	834.2	0.02	23.95	712	29.7	30.1	722.4	1534
16	0.02	23.95	1248	52.1	52.8	1266.3	0.00	24.00	971	40.5	41.1	986.0	2219
17	0.00	23.83	1668	70.0	71.0	1693.1	0.00	23.80	1331	55.9	56.8	1350.8	2999
18	0.00	24.00	1519	63.3	64.3	1542.3	0.00	24.00	1103	45.9	46.6	1119.2	2622
19	0.00	24.00	1266	52.8	53.6	1285.5	0.00	24.00	1121	46.7	47.4	1137.6	2387
20	0.00	24.00	1572	65.5	66.5	1595.8	0.00	24.00	1113	46.4	47.1	1129.5	2685
21	0.00	24.00	1345	56.0	56.9	1364.8	0.05	23.92	1121	46.8	47.5	1138.1	2466
22	0.00	24.00	1580	65.8	66.8	1603.4	0.00	24.00	1169	48.7	49.4	1186.7	2749
23	0.00	24.00	1595	66.4	67.4	1618.4	0.00	24.00	1271	52.9	53.7	1289.8	2865
24	0.00	24.00	1555	64.8	65.8	1578.7	0.00	24.00	1285	53.6	54.4	1304.6	2841
25	0.00	24.00	1259	52.5	53.2	1277.7	0.00	24.00	1385	57.7	58.6	1406.2	2644
26	0.00	24.00	1386	57.8	58.6	1406.9	0.00	24.00	1085	45.2	45.9	1101.5	2471
27	0.00	24.00	1645	68.5	69.6	1669.5	0.00	24.00	1074	44.8	45.4	1090.6	2719
28	0.00	24.00	1714	71.4	72.5	1740.2	0.00	24.00	1001	41.7	42.3	1015.7	2715
29	0.00	24.00	1420	59.2	60.1	1441.5	0.00	24.00	1026	42.7	43.4	1041.2	2446

# Daily Averages - 1/2020

Facility Name: Burney Forest Power

Location:

Source: B1 Gas

Date	Gas Oper. Hours	O2 %	CO2 %	CO (PPM)	CO @3% (PPMC)	CO (lb/mmBtu)	CO (lbs)	CO (lbs/hr)	NOx (PPM)	NOx @3% (PPMC)	NOx (lb/mmBtu)	NOx (lbs)	NOx (lbs/hr)
01/01/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/02/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/03/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/04/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/05/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/06/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/07/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/08/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/09/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/10/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/11/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/12/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/13/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/14/20	1	14.0	4.31	429.3	0.0	0.823	0.7	44.7	31.7	82.2	0.100	0.1	5.4
01/15/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/16/20	1	12.5	5.25	377.9	0.0	0.595	0.7	39.4	38.2	81.4	0.099	0.1	6.5
01/17/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/18/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/19/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/20/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/21/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/22/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/23/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/24/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/25/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/26/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/27/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/28/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/29/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/30/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/31/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0

Report Average: 0.0645 0.8548 0.3084 26.0387 0.0000 0.0457 0.0452 2.7129 2.2548 5.2774 0.0064 0.0065 0.3839

Report Total: 2 1.4 0.2

# Daily Averages - 1/2020

Facility Name: Burney Forest Power

Location:

Source: B1 Wood

Date	Wood Oper. Hours	O2 %	CO2 %	CO (PPM)	CO @12% (PPMC)	CO (lb/mmBtu)	CO (lbs)	CO (lbs/hr)	NOx (PPM)	NOx (lb/mmBtu)	NOx (lbs)	NOx (lbs/hr)
01/01/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/02/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/03/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/04/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/05/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/06/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/07/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/08/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/09/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/10/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/11/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/12/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/13/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/14/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/15/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/16/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/17/20	1	7.2	12.19	398.9	0.0	0.432	10.0	100.3	63.9	0.114	2.6	26.4
01/18/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/19/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/20/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/21/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/22/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/23/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/24/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/25/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/26/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/27/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/28/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/29/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/30/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/31/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0

Report Average: 0.0323 0.2323 0.3932 12.8677 0.0000 0.0139 0.3226 3.2355 2.0613 0.0037 0.0839 0.8516

Report Total: 1 10.0 2.6

# Daily Averages - 1/2020

Facility Name: Burney Forest Power

Location:

Source: B1 Mix

Date	Mix Oper. Hours	O2 %	CO2 %	CO (PPM)	CO @12% (PPMC)	CO (lb/mmBtu)	CO (lbs)	CO (lbs/hr)	NOx (PPM)	NOx (lb/mmBtu)	NOx (lbs)	NOx (lbs/hr)
01/01/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/02/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/03/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/04/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/05/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/06/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/07/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/08/20	2	19.3	1.16	79.2	0.0	0.756	20.5	19.9	0.8	0.011	0.6	0.4
01/09/20	24	12.9	6.69	227.8	503.4	0.462	1374.4	57.3	38.1	0.084	377.7	15.7
01/10/20	24	6.6	12.59	315.0	300.4	0.327	1900.5	79.2	74.3	0.127	736.3	30.7
01/11/20	24	6.2	13.33	472.5	421.8	0.477	2850.4	118.8	76.4	0.127	757.3	31.6
01/12/20	24	6.4	13.17	520.0	491.2	0.544	3137.3	130.7	75.6	0.127	749.1	31.2
01/13/20	24	5.9	13.69	572.0	501.1	0.566	3451.1	143.8	77.7	0.126	770.6	32.1
01/14/20	24	6.7	12.59	458.9	439.3	0.479	2765.8	115.4	72.9	0.125	721.9	30.1
01/15/20	24	5.7	13.49	503.1	446.7	0.490	3035.3	126.5	78.8	0.126	780.6	32.5
01/16/20	24	6.6	12.30	454.2	442.1	0.466	2621.5	114.2	72.7	0.123	689.2	30.0
01/17/20	24	6.4	12.83	373.7	350.2	0.382	2238.1	93.9	74.8	0.125	736.5	30.9
01/18/20	24	6.9	12.43	321.2	328.2	0.353	1938.0	80.8	71.7	0.125	711.0	29.6
01/19/20	24	6.3	13.20	308.3	280.2	0.313	1860.2	77.5	75.5	0.126	748.4	31.2
01/20/20	24	6.7	12.32	349.1	345.6	0.369	2105.7	87.7	73.4	0.126	727.4	30.3
01/21/20	24	6.1	13.09	369.0	337.8	0.369	2226.2	92.8	77.1	0.127	764.3	31.8
01/22/20	24	7.1	12.11	320.3	317.0	0.345	1932.4	80.5	71.0	0.126	703.5	29.3
01/23/20	24	7.1	12.07	324.3	330.5	0.352	1956.5	81.5	70.3	0.123	696.3	29.0
01/24/20	24	5.8	13.27	380.8	344.3	0.375	2297.4	95.7	78.1	0.127	774.6	32.3
01/25/20	24	5.4	13.84	339.0	293.2	0.325	2045.2	85.2	80.2	0.127	795.5	33.1
01/26/20	24	6.9	12.38	372.2	411.1	0.425	2245.7	93.6	71.9	0.124	712.7	29.7
01/27/20	24	7.1	12.13	331.6	327.9	0.358	2000.2	83.3	71.0	0.126	704.1	29.3
01/28/20	24	7.4	11.71	290.3	299.3	0.320	1751.3	73.0	69.4	0.125	688.2	28.7
01/29/20	24	7.1	12.33	303.5	295.9	0.327	1831.3	76.3	71.4	0.126	707.5	29.5
01/30/20	24	7.2	12.20	323.7	334.5	0.361	1953.0	81.4	69.7	0.124	690.6	28.8
01/31/20	24	6.2	13.30	351.6	317.2	0.355	2121.0	88.4	76.4	0.127	757.1	31.5

Report Average: 17.8710 5.6774 9.2974 279.3968 272.8677 0.3192 1666.4194 70.2387 53.8452 0.0923 532.2903 22.2355

Report Total: 554 51659.0 16501.0



## CO Daily Totals Daily Averages - 01/01/20 To 01/31/20

Facility Name: Burney Forest Power

Location:

Source: Boiler 1

Period: 01/01/20 00:00:00 To 01/31/20 23:59:59; Records = 31

Date	Operating Hours				B1	B1	B1	B1	B1	B1	B1
	Boiler	On Gas	On	On Mix	UP Time	Gas On	Gas CO	Wood On	Wood CO	Mix On	Mix CO
	1		Wood		Minutes	Minutes	Daily #	Minutes	Daily #	Minutes	Daily #
01/01/20	0	0	0	0	0	0	0.0	0	0.0	0	0.0
01/02/20	0	0	0	0	0	0	0.0	0	0.0	0	0.0
01/03/20	0	0	0	0	0	0	0.0	0	0.0	0	0.0
01/04/20	0	0	0	0	0	0	0.0	0	0.0	0	0.0
01/05/20	0	0	0	0	0	0	0.0	0	0.0	0	0.0
01/06/20	0	0	0	0	0	0	0.0	0	0.0	0	0.0
01/07/20	0	0	0	0	0	0	0.0	0	0.0	0	0.0
01/08/20	2	0	0	2	65	0	0.0	0	0.0	65	20.5
01/09/20	24	0	0	24	1440	0	0.0	0	0.0	1440	1374.4
01/10/20	24	0	0	24	1440	0	0.0	0	0.0	1440	1900.5
01/11/20	24	0	0	24	1440	0	0.0	0	0.0	1440	2850.4
01/12/20	24	0	0	24	1440	0	0.0	0	0.0	1440	3137.3
01/13/20	24	0	0	24	1440	0	0.0	0	0.0	1440	3451.1
01/14/20	24	1	0	24	1440	1	0.7	0	0.0	1438	2765.8
01/15/20	24	0	0	24	1440	0	0.0	0	0.0	1440	3035.3
01/16/20	24	1	0	24	1440	1	0.7	0	0.0	1437	2621.5
01/17/20	24	0	1	24	1440	0	0.0	6	10.0	1430	2238.1
01/18/20	24	0	0	24	1440	0	0.0	0	0.0	1440	1938.0
01/19/20	24	0	0	24	1440	0	0.0	0	0.0	1440	1860.2
01/20/20	24	0	0	24	1440	0	0.0	0	0.0	1440	2105.7
01/21/20	24	0	0	24	1440	0	0.0	0	0.0	1440	2226.2
01/22/20	24	0	0	24	1440	0	0.0	0	0.0	1440	1932.4
01/23/20	24	0	0	24	1440	0	0.0	0	0.0	1440	1956.5
01/24/20	24	0	0	24	1440	0	0.0	0	0.0	1440	2297.4
01/25/20	24	0	0	24	1440	0	0.0	0	0.0	1440	2045.2
01/26/20	24	0	0	24	1440	0	0.0	0	0.0	1440	2245.7
01/27/20	24	0	0	24	1440	0	0.0	0	0.0	1440	2000.2
01/28/20	24	0	0	24	1440	0	0.0	0	0.0	1440	1751.3
01/29/20	24	0	0	24	1440	0	0.0	0	0.0	1440	1831.3
01/30/20	24	0	0	24	1440	0	0.0	0	0.0	1440	1953.0
01/31/20	24	0	0	24	1440	0	0.0	0	0.0	1440	2121.0

# Daily Averages - 1/2020

Facility Name: Burney Forest Power

Location:

Source: B2 Gas

Date	Gas Oper. Hours	O2 %	CO2 %	CO (PPM)	CO @3% (PPMC)	CO (lb/mmBtu)	CO (lbs)	CO (lbs/hr)	NOx (PPM)	NOx @3% (PPMC)	NOx (lb/mmBtu)	NOx (lbs)	NOx (lbs/hr)
01/01/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/02/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/03/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/04/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/05/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/06/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/07/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/08/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/09/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/10/20	5	17.8	1.37	150.7	0.0	0.706	52.4	14.0	4.5	22.0	0.027	1.7	0.7
01/11/20	1	14.3	4.67	1002.6	0.0	2.010	1.6	93.4	36.8	99.8	0.121	0.1	5.6
01/12/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/13/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/14/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/15/20	1	13.2	3.87	912.9	0.0	1.568	1.4	85.1	38.1	88.6	0.108	0.1	5.8
01/16/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/17/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/18/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/19/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/20/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/21/20	2	12.9	5.71	794.5	0.0	1.314	3.8	74.1	39.9	89.3	0.108	0.3	6.1
01/22/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/23/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/24/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/25/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/26/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/27/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/28/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/29/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/30/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0
01/31/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.0	0.000	0.0	0.0

Report Average: 0.2903 1.8774 0.5039 92.2806 0.0000 0.1806 1.9097 8.6000 3.8484 9.6677 0.0117 0.0710 0.5871

Report Total: 9 59.2 2.2

# Daily Averages - 1/2020

Facility Name: Burney Forest Power

Location:

Source: B2 Wood

Date	Wood Oper. Hours	O2 %	CO2 %	CO (PPM)	CO @12% (PPMC)	CO (lb/mmBtu)	CO (lbs)	CO (lbs/hr)	NOx (PPM)	NOx (lb/mmBtu)	NOx (lbs)	NOx (lbs/hr)
01/01/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/02/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/03/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/04/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/05/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/06/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/07/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/08/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/09/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/10/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/11/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/12/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/13/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/14/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/15/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/16/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/17/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/18/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/19/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/20/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/21/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/22/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/23/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/24/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/25/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/26/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/27/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/28/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/29/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/30/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/31/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0

Report Average: 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000

Report Total: 0 0.0 0.0

# Daily Averages - 1/2020

Facility Name: Burney Forest Power

Location:

Source: B2 Mix

Date	Mix Oper. Hours	O2 %	CO2 %	CO (PPM)	CO @12% (PPMC)	CO (lb/mmBtu)	CO (lbs)	CO (lbs/hr)	NOx (PPM)	NOx (lb/mmBtu)	NOx (lbs)	NOx (lbs/hr)
01/01/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/02/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/03/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/04/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/05/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/06/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/07/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/08/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/09/20	0	0.0	0.00	0.0	0.0	0.000	0.0	0.0	0.0	0.000	0.0	0.0
01/10/20	4	8.5	10.43	356.2	0.0	0.586	333.6	87.5	64.6	0.126	102.9	26.1
01/11/20	24	5.9	13.14	621.6	590.0	0.629	3654.3	152.6	77.8	0.127	752.8	31.4
01/12/20	24	5.9	13.15	549.7	501.0	0.545	3239.1	135.0	77.5	0.126	750.2	31.3
01/13/20	24	6.2	12.84	521.6	515.6	0.540	3074.2	128.1	75.4	0.125	730.2	30.4
01/14/20	24	5.3	13.76	461.9	401.3	0.438	2722.2	113.4	79.7	0.125	771.8	32.2
01/15/20	24	5.6	13.33	498.2	465.8	0.491	2929.2	122.3	77.7	0.123	751.1	31.3
01/16/20	24	5.5	13.66	425.0	370.8	0.402	2399.9	104.3	79.3	0.125	736.0	32.0
01/17/20	24	6.5	12.96	342.8	420.6	0.427	1985.8	84.2	72.4	0.121	699.7	29.2
01/18/20	24	5.6	13.73	315.3	272.5	0.304	1858.3	77.4	78.3	0.125	758.6	31.6
01/19/20	24	6.3	12.99	355.3	409.2	0.420	2093.8	87.2	74.9	0.124	724.9	30.2
01/20/20	24	5.6	13.45	334.8	298.4	0.326	1973.1	82.2	79.8	0.128	772.8	32.2
01/21/20	24	5.6	13.41	338.2	329.1	0.346	1983.3	83.0	78.8	0.125	760.9	31.8
01/22/20	24	5.8	13.48	292.5	261.0	0.288	1723.4	71.8	77.8	0.125	753.2	31.4
01/23/20	24	6.1	13.14	242.9	221.6	0.243	1431.5	59.6	76.7	0.126	742.7	30.9
01/24/20	24	6.6	12.52	288.0	319.9	0.327	1696.8	70.7	72.9	0.123	705.4	29.4
01/25/20	24	9.1	9.92	317.9	554.2	0.497	1873.5	78.1	55.1	0.102	533.4	22.2
01/26/20	24	5.2	14.14	387.6	326.9	0.364	2283.8	95.2	81.7	0.127	791.4	33.0
01/27/20	24	6.2	13.32	360.7	391.9	0.417	2125.6	88.6	75.9	0.125	734.7	30.6
01/28/20	24	5.8	13.69	316.7	276.3	0.311	1866.3	77.8	78.5	0.127	759.8	31.7
01/29/20	24	7.0	12.59	341.2	346.3	0.383	2010.6	83.8	71.4	0.125	691.5	28.8
01/30/20	24	6.0	13.57	346.8	306.2	0.346	2043.7	85.2	76.9	0.126	745.1	31.0
01/31/20	24	6.5	13.18	351.8	351.7	0.389	2073.0	86.4	73.6	0.124	712.6	29.7

Report Average: 16.3871 4.4129 9.2387 269.8935 255.8161 0.2909 1528.2258 66.2710 53.4419 0.0881 499.4097 21.5613

Report Total: 508 47375.0 15481.7



## CO Daily Totals Daily Averages - 01/01/20 To 01/31/20

Facility Name: Burney Forest Power

Location:

Source: Boiler 2

Period: 01/01/20 00:00:00 To 01/31/20 23:59:59; Records = 31

Date	Operating Hours				B2	B2	B2	B2	B2	B2	B2
	Boiler 2	On Gas	On Wood	On Mix	UP Time Minutes	Gas On Minutes	Gas CO Daily #	Wood On Minutes	Wood CO Daily #	Mix On Minutes	Mix CO Daily #
01/01/20	0	0	0	0	0	0	0.0	0	0.0	0	0.0
01/02/20	0	0	0	0	0	0	0.0	0	0.0	0	0.0
01/03/20	0	0	0	0	0	0	0.0	0	0.0	0	0.0
01/04/20	0	0	0	0	0	0	0.0	0	0.0	0	0.0
01/05/20	0	0	0	0	0	0	0.0	0	0.0	0	0.0
01/06/20	0	0	0	0	0	0	0.0	0	0.0	0	0.0
01/07/20	0	0	0	0	0	0	0.0	0	0.0	0	0.0
01/08/20	0	0	0	0	0	0	0.0	0	0.0	0	0.0
01/09/20	0	0	0	0	0	0	0.0	0	0.0	0	0.0
01/10/20	8	5	0	4	462	227	52.4	0	0.0	233	333.6
01/11/20	24	1	0	24	1440	1	1.6	0	0.0	1437	3654.3
01/12/20	24	0	0	24	1440	0	0.0	0	0.0	1440	3239.1
01/13/20	24	0	0	24	1440	0	0.0	0	0.0	1440	3074.2
01/14/20	24	0	0	24	1440	0	0.0	0	0.0	1440	2722.2
01/15/20	24	1	0	24	1440	1	1.4	0	0.0	1437	2929.2
01/16/20	24	0	0	24	1440	0	0.0	0	0.0	1440	2399.9
01/17/20	24	0	0	24	1428	0	0.0	0	0.0	1428	1985.8
01/18/20	24	0	0	24	1440	0	0.0	0	0.0	1440	1858.3
01/19/20	24	0	0	24	1440	0	0.0	0	0.0	1440	2093.8
01/20/20	24	0	0	24	1440	0	0.0	0	0.0	1440	1973.1
01/21/20	24	2	0	24	1440	3	3.8	0	0.0	1435	1983.3
01/22/20	24	0	0	24	1440	0	0.0	0	0.0	1440	1723.4
01/23/20	24	0	0	24	1440	0	0.0	0	0.0	1440	1431.5
01/24/20	24	0	0	24	1440	0	0.0	0	0.0	1440	1696.8
01/25/20	24	0	0	24	1440	0	0.0	0	0.0	1440	1873.5
01/26/20	24	0	0	24	1440	0	0.0	0	0.0	1440	2283.8
01/27/20	24	0	0	24	1440	0	0.0	0	0.0	1440	2125.6
01/28/20	24	0	0	24	1440	0	0.0	0	0.0	1440	1866.3
01/29/20	24	0	0	24	1440	0	0.0	0	0.0	1440	2010.6
01/30/20	24	0	0	24	1440	0	0.0	0	0.0	1440	2043.7
01/31/20	24	0	0	24	1440	0	0.0	0	0.0	1440	2073.0



March 31, 2020

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 – Feb 2020**  
**Burney Forest Products**

Dear Ms. Welch,

Pursuant to Title V Operating Permit 87-TV-27n, Condition 20, enclosed please find the February 2020 *Monthly Emissions Report* for Burney Forest Products (BFP).

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

Sincerely,

Bill Dillard  
Plant Manager

Cc: John Christian (email)

File: 201-40-03

**BURNEY FOREST PRODUCTS**  
**Monthly Emissions Report**  
**Feb 2020**

<b>EXCESS EMISSION SUMMARY</b>			
<b>Parameter</b>	<b>Limit</b>	<b>Averaging Period</b>	<b>Excursions</b>
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

<b>CEMS/COMS DOWNTIME PERIODS</b>	
<b>NOx</b>	
Boiler 1	None
Boiler 2	None
<b>CO</b>	
Boiler 1	None
Boiler 2	None
<b>CO2</b>	
Boiler 1	None
Boiler 2	None
<b>O2</b>	
Boiler 1	None
Boiler 2	None
<b>OPACITY</b>	
Boiler 1	None
Boiler 2	None

OPERATING DATA	
<b>Ammonia Usage (Pounds)</b>	
Boiler 1	24,812
Boiler 2	45,039
Total Both Boilers	69,851
<b>Boiler Operating Time (Hours)</b>	
Boiler 1	658
Boiler 2	696

BOILER OFF LINE TIMES				
<b>Boiler 1</b>				
Boiler Off line		Boiler On line		Cause
Date	Time off	Date	Time on	
2/14/20	10:16	2/16/20	0:23	Offline for maintenance to address TR-1B malfunction
<b>Boiler 2</b>				
Boiler Off line		Boiler On line		Cause
Date	Time off	Date	Time on	
				No downtime in February 2020

Note: Boiler Off Line Times are in Pacific time

CAM Plan Excursions	
<b>Date</b>	<b>Description</b>
2/13/2020	On Feb 13, 2020, Boiler #1 ESP transformer TR-1B tripped off and would not restart, which resulted in an excursion according to CAM Plan provisions specified in Permit Condition 43. Even with the loss of this precipitator zone, observed opacities were able to be maintained within permit limits. No excess emissions were observed during this time. Lindsey Welch (SCAQMD) was immediately notified. To address this issue, the boiler was shut down on Feb 14th to repair Boiler #1 ESP transformer TR-1B.





April 29, 2020

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 – Mar 2020**  
**Burney Forest Products**

Dear Ms. Welch,

Pursuant to Title V Operating Permit 87-TV-27n, Condition 20, enclosed please find the March 2020 *Monthly Emissions Report* for Burney Forest Products (BFP).

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 black ink, appearing to read 'Bill Dillard', with a long horizontal line extending to the right.

Bill Dillard  
Plant Manager

Cc: John Christian (email)

File: 201-40-03

**BURNEY FOREST PRODUCTS**  
**Monthly Emissions Report**  
**Mar 2020**

<b>EXCESS EMISSION SUMMARY</b>			
<b>Parameter</b>	<b>Limit</b>	<b>Averaging Period</b>	<b>Excursions</b>
CO – Gas	400 ppm@3% O <sub>2</sub>	24-hr Block Avg (Calendar Day)	None
CO - Wood	1,200 ppm@12% CO <sub>2</sub>	24-hr Block Avg (Calendar Day)	None
NO <sub>x</sub> – Gas	70 ppm@3% O <sub>2</sub>	3-hr Block Avg	None
NO <sub>x</sub> – Gas	0.084 lb/mmBtu	3-hr Block Avg	None
NO <sub>x</sub> – Wood	0.12 lb/mmBtu	3-hr Block Avg	None
NO <sub>x</sub> – Mixed Fuel – Boiler 1	0.145 lb/mmBtu	3-hr Block Avg	None
NO <sub>x</sub> – Mixed Fuel – Boiler 2	0.146 lb/mmBtu	3-hr Block Avg	None
NO <sub>x</sub> – All Fuels	57.4 lb/hr (both boilers combined)	1-hr Total	None
NO <sub>x</sub> – All Fuels	250 ppm@12% CO <sub>2</sub>	1-hr Avg	None
Opacity	20%	6-min Avg	None
Opacity	40%	3-min aggr./hr	None

<b>CEMS/COMS DOWNTIME PERIODS</b>	
<b>NO<sub>x</sub></b>	
Boiler 1	On 3/11/2020: One (1) hour of downtime to perform preventive maintenance.
Boiler 2	On 3/11/2020: One (1) hour of downtime to perform preventive maintenance.
<b>CO</b>	
Boiler 1	On 3/11/2020: One (1) hour of downtime to perform preventive maintenance.
Boiler 2	On 3/11/2020: One (1) hour of downtime to perform preventive maintenance.
<b>CO<sub>2</sub></b>	
Boiler 1	On 3/11/2020: One (1) hour of downtime to perform preventive maintenance.
Boiler 2	On 3/11/2020: One (1) hour of downtime to perform preventive maintenance.
<b>O<sub>2</sub></b>	
Boiler 1	On 3/11/2020: One (1) hour of downtime to perform preventive maintenance.
Boiler 2	On 3/11/2020: One (1) hour of downtime to perform preventive maintenance.
<b>OPACITY</b>	
Boiler 1	On 3/11/20: Fourteen six-minute periods (84-minutes) of downtime to perform quality assurance testing (CGA) on CEMS.
Boiler 1	On 3/27/20: Three six-minute periods (18-minutes) of downtime to perform the quarterly opacity audit.

<b>CEMS/COMS DOWNTIME PERIODS</b>	
Boiler 2	On 3/11/20: Fourteen six-minute periods (84-minutes) of downtime to perform quality assurance testing (CGA) on CEMS.
Boiler 2	On 3/27/20: Three six-minute periods (18-minutes) of downtime to perform the quarterly opacity audit.

<b>OPERATING DATA</b>	
<b>Ammonia Usage (Pounds)</b>	
Boiler 1	47,672
Boiler 2	67,918
Total Both Boilers	115,590
<b>Boiler Operating Time (Hours)</b>	
Boiler 1	708
Boiler 2	698

<b>BOILER OFF LINE TIMES</b>				
<b>Boiler 1</b>				
Boiler Off line		Boiler On line		Cause
Date	Time off	Date	Time on	
3/3/20	11:40	3/5/20	0:42	Offline for maintenance to address TR-1B malfunction
3/23/20	16:35	3/23/20	17:25	Offline due to PG&E line trip
3/24/20	0:10	3/24/20	7:06	Offline for unplanned maintenance
<b>Boiler 2</b>				
Boiler Off line		Boiler On line		Cause
Date	Time off	Date	Time on	
3/22/20	9:59	3/24/20	7:06	Offline for scheduled maintenance

Note: Boiler Off Line Times are in Pacific time



May 29, 2020

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 – Apr 2020**  
**Burney Forest Products**

Dear Ms. Welch,

Pursuant to Title V Operating Permit 87-TV-27n, Condition 20, enclosed please find the April 2020 *Monthly Emissions Report* for Burney Forest Products (BFP).

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 black ink, appearing to read 'Bill Dillard', with a long horizontal line extending to the right.

Bill Dillard  
Plant Manager

Cc: John Christian (email)

File: 201-40-03

**BURNEY FOREST PRODUCTS**  
**Monthly Emissions Report**  
**Apr 2020**

<b>EXCESS EMISSION SUMMARY</b>			
<b>Parameter</b>	<b>Limit</b>	<b>Averaging Period</b>	<b>Excursions</b>
CO – Gas	400 ppm@3% O <sub>2</sub>	24-hr Block Avg (Calendar Day)	None
CO - Wood	1,200 ppm@12% CO <sub>2</sub>	24-hr Block Avg (Calendar Day)	None
NO <sub>x</sub> – Gas	70 ppm@3% O <sub>2</sub>	3-hr Block Avg	None
NO <sub>x</sub> – Gas	0.084 lb/mmBtu	3-hr Block Avg	None
NO <sub>x</sub> – Wood	0.12 lb/mmBtu	3-hr Block Avg	None
NO <sub>x</sub> – Mixed Fuel – Boiler 1	0.145 lb/mmBtu	3-hr Block Avg	None
NO <sub>x</sub> – Mixed Fuel – Boiler 2	0.146 lb/mmBtu	3-hr Block Avg	None
NO <sub>x</sub> – All Fuels	57.4 lb/hr (both boilers combined)	1-hr Total	None
NO <sub>x</sub> – All Fuels	250 ppm@12% CO <sub>2</sub>	1-hr Avg	None
Opacity	20%	6-min Avg	None
Opacity	40%	3-min aggr./hr	None

<b>CEMS/COMS DOWNTIME PERIODS</b>	
<b>NO<sub>x</sub></b>	
Boiler 1	On 4/30/2020: One (1) hour of downtime to perform preventive maintenance.
Boiler 2	On 4/30/2020: One (1) hour of downtime to perform preventive maintenance.
<b>CO</b>	
Boiler 1	On 4/30/2020: One (1) hour of downtime to perform preventive maintenance.
Boiler 2	On 4/30/2020: One (1) hour of downtime to perform preventive maintenance.
<b>CO<sub>2</sub></b>	
Boiler 1	On 4/30/2020: One (1) hour of downtime to perform preventive maintenance.
Boiler 2	On 4/30/2020: One (1) hour of downtime to perform preventive maintenance.
<b>O<sub>2</sub></b>	
Boiler 1	On 4/30/2020: One (1) hour of downtime to perform preventive maintenance.
Boiler 2	On 4/30/2020: One (1) hour of downtime to perform preventive maintenance.
<b>OPACITY</b>	
Boiler 1	On 4/24/20: Two (2) six-minute periods (12-minutes) of downtime due to line trip.
Boiler 1	On 4/26/20: One (1) six-minute period (6 minutes) of downtime due to malfunction from momentary loss of pressure in instrument air supply.
Boiler 2	None

OPERATING DATA	
<b>Ammonia Usage (Pounds)</b>	
Boiler 1	45,119
Boiler 2	73,898
Total Both Boilers	119,017
<b>Boiler Operating Time (Hours)</b>	
Boiler 1	719
Boiler 2	711

BOILER OFF LINE TIMES				
<b>Boiler 1</b>				
Boiler Off line		Boiler On line		Cause
Date	Time off	Date	Time on	
4/24/20	18:20	4/24/20	20:31	Offline due to PG&E line trip
<b>Boiler 2</b>				
Boiler Off line		Boiler On line		Cause
Date	Time off	Date	Time on	
4/24/20	18:20	4/25/20	03:09	Offline due to PG&E line trip

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