

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6027E
As of January 22, 2021

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: 12-21-2020

Date to Calendar: 12-23-2020

Authorizing Documents: D1812003

Disposition:	Accepted
Effective Date:	12-21-2020

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Kimberly Loo

415-973-4587

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

December 21, 2020

Advice 6027-E

(Pacific Gas and Electric Company – U 39 E)

Public Utilities Commission of the State of California

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

Purpose

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

Background

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

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

² D.18-12-003 was issued on December 21, 2018. Six months from this date falls on June 21, 2019. Six months from June 21, 2019 falls on December 21, 2019. Six months from December 21, 2019 falls on June 21, 2020. Six months from June 21, 2020 falls on December 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.³ Pursuant to General Order 96-B Section 6.2, PG&E is not seeking relief through this advice letter and is not subject to protest.

Effective Date

PG&E requests that this information-only advice letter become effective upon date of submittal, which is December 21, 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/>.

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

/S/

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) #: 6027-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: Every six months

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

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

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

Confidential treatment requested? ☐ Yes ☒ No

If yes, specification of confidential information:

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

Resolution required? ☐ Yes ☒ No

Requested effective date: 12/21/20

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 proposed¹: N/A

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

¹Discuss in AL if more space is needed.

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

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

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

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

Clear Form

PACIFIC GAS AND ELECTRIC COMPANY

ATTACHMENT 1

Wheelabrator Shasta Air Quality Attestation



APPENDIX C AIR QUALITY ATTESTATION

[VIA ELECTRONIC SUBMISSION]

December 9, 2020

PG&E

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

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

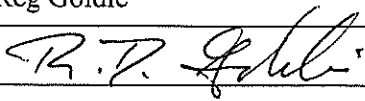
Dear Sir or Madam:

Seller attests that the Project ***was not*** in compliance with all applicable air pollution and control requirements for the period beginning ***June 1, 2020*** and ending ***November 30, 2020***. Seller hereby represents and warrants that:

1. This Air Quality Attestation *is* submitted in compliance to PG&E's request dated December 1, 2020.
2. Seller ***was not*** in compliance with all applicable air pollution and control requirements for the period.
3. List of non-compliance: ***Deviation to Title V permit conditions occurred during the 2nd half of 2020 as detailed in the 2020 Deviation Report Forms. The deviations were: (1) on 6/20/20 there was a 6-minute excess opacity emission event; (2) the excess opacity emission event was not reported to the local agency within the required 4 hour time limit; (3) on 7/12/20, after a black plant event, a daily calibration did not occur on an opacity monitor, and (4) during a black plant event, the fuel pile camera lost power and fuel pile condition camera records were not obtained for two brief periods.***

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	12-10-2020

PACIFIC GAS AND ELECTRIC COMPANY

ATTACHMENT 2

Wheelabrator Shasta Semi-Annual Certification Report

Facility Name: Wheelabrator Shasta Energy Company
Reporting Period: June 1, 2020 to November 30, 2020
Facility Permit Number: 86-VP-08h and 86-TV-08i*
*86-TV-08i became effective on 7/28/20

Report Due Date: December 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.

Derrick Boom
Name of Responsible Official Certifying Compliance

Environmental Manager
Title of Responsible Official and Company Name

D Boom
Signature of Responsible Official

12/9/20
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: June 1, 2020 to November 30, 2020
 Facility Permit: 86-VP-08h and 86-TV-08i *

* The Title V permit renewal was effective 7/28/20

Report Due Date: December 2020

Submittal Type:

<input checked="" type="checkbox"/>	Monitoring Report (District Rule 5.VI.B.7)
<input type="checkbox"/>	Compliance Schedule Progress Report
<input type="checkbox"/>	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 and 86-TV-08i 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 and 86-TV-08i 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 and 86-TV-08i 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	X Yes No	Yes X No	Yes X No	Yes X No
86-VP-08h and 86-TV-08i 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	X Yes No	Yes X No	Yes X No
86-VP-08h and 86-TV-08i 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 and 86-TV-08i 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 and 86-TV-08i 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 and 86-TV-08i 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 and 86-TV-08i 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: June 1, 2020 to November 30, 2020
 Facility Permit: 86-VP-08h and 86-TV-08i *
 * The Title V permit renewal was effective 7/28/20

Report Due Date: December 2020
 Submittal Type:

<input checked="" type="checkbox"/>	Monitoring Report (District Rule 5.VI.B.7)
<input type="checkbox"/>	Compliance Schedule Progress Report
<input type="checkbox"/>	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 and 86-TV-08i 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
86-VP-08h and 86-TV-08i 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
86-VP-08h and 86-TV-08i 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
86-VP-08h and 86-TV-08i 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
86-VP-08h and 86-TV-08i 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
86-VP-08h and 86-TV-08i 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
86-VP-08h and 86-TV-08i 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
86-VP-08h and 86-TV-08i 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
86-VP-08h and 86-TV-08i 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

Facility Name: Wheelabrator Shasta Energy Company

Reporting Period: June 1, 2020 to November 30, 2020

Facility Permit: 86-VP-08h and 86-TV-08i *

* The Title V permit renewal was effective 7/28/20

Report Due Date: December 2020

Submittal Type:

<input checked="" type="checkbox"/>	Monitoring Report (District Rule 5.VI.B.7)
<input type="checkbox"/>	Compliance Schedule Progress Report
<input type="checkbox"/>	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 and 86-TV-08i Condition 15	Air Pollution Control Equipment - Maintain facility such that the Air Pollution Control equipment is in service while combustion process is occurring.	<input checked="" type="checkbox"/> Yes No	<input checked="" type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 16	CEMS - Maintain the Continuous Emissions Monitoring System (CEMS) and Data Acquisition System (DAS). Review emissions data monthly and summarize monitor downtime in the monthly report.	<input checked="" type="checkbox"/> Yes No	<input checked="" type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input checked="" type="checkbox"/> Yes No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 17	Fuel Turnover – Maintain fuel turnover to less than 180 days. Compliance is demonstrated by following the Fuel Management Plan (Condition 54).	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 19	Steam Limits - Maintain the DAS and fuel use database.	<input checked="" type="checkbox"/> Yes No	<input checked="" type="checkbox"/> Continuous Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 20	Water Treatment Chemicals – Ensure no chrome-based water treatment chemicals are used.	<input checked="" type="checkbox"/> Yes No	<input checked="" type="checkbox"/> Continuous Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 21a - 21f	Combustion and Control Parameters - Maintain the Bailey/NT Boiler Control system for conditions 21b through 21f. Maintain DAS and fuel use database for Condition 21a.	<input checked="" type="checkbox"/> Yes No	<input checked="" type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 21g	Sulfur in Fuels - Sample railroad ties on a monthly basis. [NOTE: No RR Ties used during this reporting period.]	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 22	Emission Reports - Submit a monthly report containing the required information to the District by the first day of the following month.	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 23 (District-only requirement)	Deodorizer Use Records – Maintain monthly deodorizer use records along with calendar year totals.	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No

Facility Name: Wheelabrator Shasta Energy Company
 Reporting Period: June 1, 2020 to November 30, 2020
 Facility Permit: 86-VP-08h and 86-TV-08i *
 * The Title V permit renewal was effective 7/28/20

Report Due Date: December 2020
 Submittal Type:

<input checked="" type="checkbox"/>	Monitoring Report (District Rule 5.VI.B.7)
<input type="checkbox"/>	Compliance Schedule Progress Report
<input type="checkbox"/>	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 and 86-TV-08i Condition 24	Emission Test Methods – Use only stipulated test methods unless approved in advance.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 25	Annual Source Test – Conduct annual source test for PM and ammonia. Annually test for SOx feeding creosote-treated wood at rates as indicated.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 26	Annual Source Test Process Rate – Conduct annual source test within 90% of full operation in accordance with District Rule 3.26.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 27	Source Test – Use independent vendor; Comply with approved test method procedures.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 28	Source Tests - Perform source tests at the required frequency. Submit test reports to AQMD as required.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 29	Excess Emissions - Maintain a log of APCO notifications, Report within 4 hours	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Continuous <input checked="" type="checkbox"/> Intermittent	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 30	Permit Deviations - Maintain a log of APCO notifications.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 31	Semi-Annual Compliance Reports - Submit the semi-annual compliance certification to the District by the required date.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 32	Annual Compliance Reports - Submit annual certification to the District and U.S. EPA.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No

Facility Name: Wheelabrator Shasta Energy Company
 Reporting Period: June 1, 2020 to November 30, 2020
 Facility Permit: 86-VP-08h and 86-TV-08i *
 * The Title V permit renewal was effective 7/28/20

Report Due Date: December 2020
 Submittal Type:

<input checked="" type="checkbox"/>	Monitoring Report (District Rule 5.VI.B.7)
<input type="checkbox"/>	Compliance Schedule Progress Report
<input type="checkbox"/>	Compliance Certification (District Rule 5.VI.B.14)

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				Any Excursions?		Any Exceedances?		Other Information Indicating Non- Compliance?		
86-VP-08h and 86-TV-08i Condition 33	Emission Limit Demonstration – Verify compliance with standard limits upon request. No request was made.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
86-VP-08h and 86-TV-08i Condition 34	Visible Emission Observations - Maintain at least one employee currently certified as a Visible Emissions Evaluator. Maintain a log of daily visual stack inspections.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
86-VP-08h and 86-TV-08i Condition 35	Monitoring and Support Records - Maintain records of maintenance and operation. Maintain CEMS data records.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
86-VP-08h and 86-TV-08i Condition 36	Emission Increases – Notify AQMD of changes that increase emissions.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
86-VP-08h and 86-TV-08i Condition 37	File of all Measurements & Other Information Required in 40 CFR 60 - Maintain file of all measurements and other information required in 40 CFR 60 including CEMS, performance testing, etc.....	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
86-VP-08h and 86-TV-08i Condition 38	Compliance Test Notification & Report Submittals - Maintain all APCO correspondence pertaining to notification of emission testing and testing results.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
86-VP-08h and 86-TV-08i Condition 39	Testing Facilities - Maintain a safe stack sampling location.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
86-VP-08h and 86-TV-08i Condition 40 (District-only requirement)	Wind Speed and Direction - Maintain a wind speed/direction monitor at the site. Data is recorded on electronic media.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
86-VP-08h and 86-TV-08i Condition 41	Good Operating Practices – Operate and maintain equipment to minimize emissions.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		

Facility Name: Wheelabrator Shasta Energy Company

Reporting Period: June 1, 2020 to November 30, 2020

Facility Permit: 86-VP-08h and 86-TV-08i *

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				Any Excursions?	Any Exceedances?	Other Information Indicating Non-Compliance?	
86-VP-08h and 86-TV-08i Condition 42	Opacity Monitors Span & Data Acquisition – Maintain properly designed and installed opacity monitors. Maintain COMS data records.	<input checked="" type="checkbox"/> Yes No	<input checked="" type="checkbox"/> Continuous Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 43	CEMs Data – Maintain CEMs operational and log of AQMD notifications.	<input checked="" type="checkbox"/> Yes No	<input checked="" type="checkbox"/> Continuous Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 44	Fuels & Capacity Factor – Maintain records of amounts of each fuel used. Maintain a record of monthly rolling annual capacity factor for each boiler.	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 45	Risk Management Plan - Maintain Risk Management Plan.	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 46	CAM Plan - Maintain ESP monitoring computer and records required by the Compliance Assured Monitoring (CAM) Plan.	<input checked="" type="checkbox"/> Yes No	<input checked="" type="checkbox"/> Continuous Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 47	ESP Power - Maintain ESP power monitoring system.	<input checked="" type="checkbox"/> Yes No	<input checked="" type="checkbox"/> Continuous Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 48	ESP Power Excursions - Respond to and report as excursions all periods where the power requirement is not met. Maintain power input greater than 22 kw.	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 49	Semi-Annual NSPS Excess Emission Report - Submit semi-annual excess emission report to USEPA Region IX.	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 50	Semi-Annual NSPS Summary Report - Submit semi-annual summary report.	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No

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

Facility Name: Wheelabrator Shasta Energy Company
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 Facility Permit: 86-VP-08h and 86-TV-08i *
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				Any Excursions?		Any Exceedances?		Other Information Indicating Non- Compliance?		
86-VP-08h and 86-TV-08i Condition 67	Permit Posting – Maintain posted permits in good condition.	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 73	Inspections – Permit entry of authorized agency personnel.	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 75	Permit Renewal – Submit administratively complete permit renewal application within required timeframe.	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 76	Fees – Submit annual fees	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 77	Ozone Depleting Substances – Hire only certified technicians for ODS work.	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 78	Ozone Depleting Substances – Hire only certified technicians for ODS work.	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 79	Ozone Depleting Substances – Hire only certified technicians for ODS work.	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 80	Circumvention – Maintain operations so as to not circumvent emission limits.	<input checked="" type="checkbox"/> Yes No	<input checked="" type="checkbox"/> Continuous Intermittent	Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 82	Maintenance – Maintain equipment in original operating condition.	<input checked="" type="checkbox"/> Yes No	<input checked="" type="checkbox"/> Continuous Intermittent	Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No

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				Any Excursions?	Any Exceedances?	Other Information Indicating Non-Compliance?	
86-VP-08h and 86-TV-08i Condition 84	Equipment Design – Design all equipment to minimize emissions and maintain compliance.	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 86	Training – Provide training for operating staff.	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 87	New Source Performance Standards – Comply with NSPS standards.	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 89	Subpart ZZZZ Diesel Engine Requirements – Track hours of operation. Ensure maintenance is performed and records are kept as required.	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 90	Subpart ZZZZ Diesel Engine Records – Maintain maintenance records and records of hours of operation.	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 92	Boiler Tune-Ups – Tune each boiler at the required frequency. Tune-ups are annual unless a continuous oxygen trim system is used.	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 93	Energy Assessment – Perform the Energy Assessment. Submit upon request.	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 94	Initial Notification of Compliance Status – Submit the initial Compliance Status Report within 60 days of completion of all initial performance tests and other initial compliance demonstrations.	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 95	Subpart DDDDD 30-Day Rolling CO Limit - Maintain Continuous Emissions Monitoring System (CEMS) for CO to calculate 30-day rolling averages.	<input checked="" type="checkbox"/> Yes No	<input checked="" type="checkbox"/> Continuous Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No

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				Any Excursions?		Any Exceedances?		Other Information Indicating Non-Compliance?		
86-VP-08h and 86-TV-08i 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.	<div>X</div> Yes No	<div>Continuous</div> <div>X</div> Intermittent	<div>Yes</div> <div>X</div> No	<div>Yes</div> <div>X</div> No	<div>Yes</div> <div>X</div> No	<div>Yes</div> <div>X</div> No	<div>X</div> Yes No		
86-VP-08h and 86-TV-08i 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.	<div>X</div> Yes No	<div>Continuous</div> <div>X</div> Intermittent	<div>Yes</div> <div>X</div> No	<div>Yes</div> <div>X</div> No	<div>Yes</div> <div>X</div> No	<div>Yes</div> <div>X</div> No	<div>X</div> Yes No		
86-VP-08h and 86-TV-08i 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.	<div>X</div> Yes No	<div>Continuous</div> <div>X</div> Intermittent	<div>Yes</div> <div>X</div> No	<div>Yes</div> <div>X</div> No	<div>Yes</div> <div>X</div> No	<div>Yes</div> <div>X</div> No	<div>X</div> Yes No		
86-VP-08h and 86-TV-08i Condition 99	Subpart DDDDD Opacity Limit – Maintain Continuous Opacity Monitors (COMS) and computer to calculate daily block averages.	<div>X</div> Yes No	<div>X</div> Continuous Intermittent	<div>Yes</div> <div>X</div> No	<div>Yes</div> <div>X</div> No	<div>Yes</div> <div>X</div> No	<div>Yes</div> <div>X</div> No	<div>Yes</div> <div>X</div> No		
86-VP-08h and 86-TV-08i Condition 100	Subpart DDDDD Operating Load Limit – Maintain Continuous Monitoring System for steam production and a computer to calculate 30-day rolling averages.	<div>X</div> Yes No	<div>X</div> Continuous Intermittent	<div>Yes</div> <div>X</div> No	<div>Yes</div> <div>X</div> No	<div>Yes</div> <div>X</div> No	<div>Yes</div> <div>X</div> No	<div>X</div> Yes No		
86-VP-08h and 86-TV-08i Condition 101	Subpart DDDDD Boiler Emission Averaging – Emission averaging is not done. No plan needed, not using emissions averaging.	<div>X</div> Yes No	<div>X</div> Continuous Intermittent	<div>Yes</div> <div>X</div> No	<div>Yes</div> <div>X</div> No	<div>Yes</div> <div>X</div> No	<div>Yes</div> <div>X</div> No	<div>Yes</div> <div>X</div> No		
86-VP-08h and 86-TV-08i Condition 102	Subpart DDDDD Good Operating Practices – Operate and maintain equipment to minimize emissions.	<div>X</div> Yes No	<div>X</div> Continuous Intermittent	<div>Yes</div> <div>X</div> No	<div>Yes</div> <div>X</div> No	<div>Yes</div> <div>X</div> No	<div>Yes</div> <div>X</div> No	<div>Yes</div> <div>X</div> No		
86-VP-08h and 86-TV-08i 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.	<div>X</div> Yes No	<div>Continuous</div> <div>X</div> Intermittent	<div>Yes</div> <div>X</div> No	<div>Yes</div> <div>X</div> No	<div>Yes</div> <div>X</div> No	<div>Yes</div> <div>X</div> No	<div>Yes</div> <div>X</div> No		
86-VP-08h and 86-TV-08i Condition 104	Subpart DDDDD Affirmative Defense – May be made for malfunctions as per requirements	<div>X</div> Yes No	<div>X</div> Continuous Intermittent	<div>Yes</div> <div>X</div> No	<div>Yes</div> <div>X</div> No	<div>Yes</div> <div>X</div> No	<div>Yes</div> <div>X</div> No	<div>Yes</div> <div>X</div> No		

Facility Name: Wheelabrator Shasta Energy Company

Reporting Period: June 1, 2020 to November 30, 2020

Facility Permit: 86-VP-08h and 86-TV-08i *

* The Title V permit renewal was effective 7/28/20

Report Due Date: December 2020

Submittal Type:

<input checked="" type="checkbox"/>	Monitoring Report (District Rule 5.VI.B.7)
<input type="checkbox"/>	Compliance Schedule Progress Report
<input type="checkbox"/>	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 and 86-TV-08i Condition 105	Subpart DDDDD Data Collection – Collect data in accordance with Table 8 of Subpart DDDDD.	<input checked="" type="checkbox"/> Yes No	<input checked="" type="checkbox"/> Continuous Intermittent	Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 106	Subpart DDDDD Site Specific Monitoring Plan – Develop and maintain a Site Specific Monitoring Plan. Submit upon request.	<input checked="" type="checkbox"/> Yes No	<input checked="" type="checkbox"/> Continuous Intermittent	Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 107	Subpart DDDDD Monitoring Systems Operation – Operate the monitoring system as required, maintain records of system operations including results of performance audits, out of control periods, etc.... and submit upon request. Include all data, unless otherwise excepted, in assessing compliance.	<input checked="" type="checkbox"/> Yes No	<input checked="" type="checkbox"/> Continuous Intermittent	Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 108	Subpart DDDDD Initial Performance Test – Perform the initial testing.	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 109	Initial Performance Testing Alternative: Fuel Sampling & Analysis – This option was not used.	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 110	Initial & Annual Performance Evaluations of CO CEMS & COMS – Notify the District of evaluations, perform evaluations initially and annually, and submit the evaluation reports, as required in the permit.	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 111	Site Specific Fuel Monitoring Plan, If Required - A fuel monitoring plan is not required at this time, as the plant uses a single fuel (biomass) along with natural gas as supplemental fuel for startup, shutdown, and flame stabilization purposes.	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 112	Periodic Performance Testing – Perform testing annually (at least every 12 months), or every 3 rd year (at least every 37 months), if pollutants are less than 75% of the applicable limit for at least two years and there are no changes that could increase emissions.	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Yes No
86-VP-08h and 86-TV-08i Condition 113	Periodic Performance Testing Alternative: Fuel Sampling & Analysis – This option is not used.	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No		Yes <input checked="" type="checkbox"/> No

Facility Name: Wheelabrator Shasta Energy Company

Reporting Period: June 1, 2020 to November 30, 2020

Facility Permit: 86-VP-08h and 86-TV-08i *

* The Title V permit renewal was effective 7/28/20

Report Due Date: December 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 and 86-TV-08i Condition 114	Performance Testing Methods, Notifications, & Submittal of Test Plans – Use the specified methods and submit notifications and test plans as required in the permit.	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 115	Performance Test Reports – Submit performance test reports as required in the permit.	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 116	New Fuel Requirements –No new fuels used during the reporting period.	<input checked="" type="checkbox"/> Yes No	<input checked="" type="checkbox"/> Continuous Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 117	Applicability of New 40 CFR 63 Subpart DDDDD Subcategory Due to Fuel Switch / Physical Boiler Change – Submit required notification if applicability changes. No such change this reporting period.	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 118	Non-Hazardous Secondary Materials, Not Solid Waste – If NHSM have been determined not to be solid waste per 40 CFR 241, keep records of the determination as required in the permit.	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 119	40 CFR 63 Subpart DDDDD Semi-Annual Compliance Reports – Submit semi-annual reports.	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 120	Maintain 40 CFR 63 Subpart DDDDD Records – Subpart DDDDD records are maintained as required.	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No
86-VP-08h and 86-TV-08i Condition 121	Alternative Output Based Limits & Credit for Energy Conservation Measures – These options are not used.	<input checked="" type="checkbox"/> Yes No	Continuous <input checked="" type="checkbox"/> Intermittent	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No

List of Conditions Not Requiring Certification (Informational Only)	
Title V Condition No.	June 1, 2020 to November 30, 2020
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

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

SHASTA COUNTY AIR QUALITY MANAGEMENT DISTRICT

DEVIATION INFORMATION

- 1. Permit numbers(s) and condition(s) of emission unit or control unit affected:**
86-VP-08h – Condition 3
- 2. Description of deviation and methods used to determine compliance status:**
As previously reported, there was one 6-minute opacity block of 30% on 6/20/20 on boiler #2.
- 3. Description and identification of permit condition(s) deviated:**
Condition 3 requires we maintain 6-minute average stack opacity to less than or equal to 20%, except for one period not more than 27% per hour.
- 4. Associated equipment and equipment operation (if any):**
Boiler #2 and ESP #2
- 5. Date and time when deviation was discovered:**
6/20/20 at 00:54
- 6. Date, time and duration of deviation:**
From 00:54 to 00:59 PM on 6/20/20
- 7. Probable cause of deviation:**
Combustion issues resulted in high CO and low O2 which caused field 1 on the ESP to trip
- 8. Preventative or corrective action taken:**
Corrective actions were taken immediately to adjust the boiler combustion conditions and restart the ESP field.

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

SHASTA COUNTY AIR QUALITY MANAGEMENT DISTRICT

DEVIATION INFORMATION

- 1. Permit numbers(s) and condition(s) of emission unit or control unit affected:**
86-VP-08h – Condition 16
- 2. Description of deviation and methods used to determine compliance status:**
As previously reported, there was no daily calibration on an emission monitor when boiler was online.
- 3. Description and identification of permit condition(s) deviated:**
Condition 16 requires a daily calibration check for the opacity monitor when the boiler is online.
- 4. Associated equipment and equipment operation (if any):**
Opacity monitor for boiler #2.
- 5. Date and time when deviation was discovered:**
July 20, 2020.
- 6. Date, time and duration of deviation:**
July 12, 2020
- 7. Probable cause of deviation:**
The daily automatic calibration was scheduled to be performed during the time of the black plant event.
- 8. Preventative or corrective action taken:**
Instruct plant personnel to double check the CEMS after a power failure to ensure that a calibration is performed on all boilers that are online.

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

SHASTA COUNTY AIR QUALITY MANAGEMENT DISTRICT

DEVIATION INFORMATION

- 1. Permit numbers(s) and condition(s) of emission unit or control unit affected:**
86-VP-08h – Condition 29b
- 2. Description of deviation and methods used to determine compliance status:**
As previously reported, there was one instance when an excess opacity emissions report was not reported within four hours of the occurrence of the event.
- 3. Description and identification of permit condition(s) deviated:**
Condition 29b requires that all excess emissions be reported within four hours.
- 4. Associated equipment and equipment operation (if any):**
Boiler #1
- 5. Date and time when deviation was discovered:**
The excess emissions event on 6/20/20 was first discovered on 7/2/20 and reported promptly.
- 6. Date, time and duration of deviation:**
The deviation report was sent out upon discovery. This was twelve days after the occurrence.
- 7. Probable cause of deviation:**
The plant operators did not report the event internally nor to AQMD.
- 8. Preventative or corrective action taken:**
Discuss critical need to report all events internally and externally immediately.

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

SHASTA COUNTY AIR QUALITY MANAGEMENT DISTRICT

DEVIATION INFORMATION

- 1. Permit numbers(s) and condition(s) of emission unit or control unit affected:**
86-VP-08h – Condition 51 and 54
- 2. Description of deviation and methods used to determine compliance status:**
As previously reported, there were periods when there was a loss of power to the fuel pile camera when the plant went black, resulting in the lack video records.
- 3. Description and identification of permit condition(s) deviated:**
Condition 51 requires that there be a continuous recording of the fuel pile and that records be kept for six months. Condition 54 requires compliance with the Fuel Management Plan, which references back to Condition 51.
- 4. Associated equipment and equipment operation (if any):**
Fuel Pile Camera and DVR
- 5. Date and time when deviation was discovered:**
The loss of the fuel pile camera DVR records occurred during black plant events at the following dates:
 - July 12, 2020
 - July 20, 2020
- 6. Date, time and duration of deviation:**
The events durations were:
 - From 03:13 to 04:51 on July 12
 - From 02:40 to 05:02 on July 20
- 7. Probable cause of deviation:**
The fuel pile camera signal converter lost power during the black plant events resulting in a loss of signal to the DVR.
- 8. Preventative or corrective action taken:**
Restore power to the plant systems and camera and ensure the feed to the DVR is operational.

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

SHASTA COUNTY AIR QUALITY MANAGEMENT DISTRICT

DEVIATION INFORMATION

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

2020 H2 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 ₂	441	1696 Three boiler average	EPA Method 10	6/25/20
Carbon Monoxide - CO	lbs/hr	103	793 Total all three boilers	EPA Method 10	6/25/20
Ammonia - NH ₃	ppm @ 3% O ₂	6.9	28	SCAQMD 207.1 Modified	6/25/20
Oxides of Sulfur - SO ₂	ppm @ 3% O ₂	4.6	24	EPA Method 6C	6/25/20
Oxides of Sulfur - SO ₂	lbs/hr	2.4	45 Total all three boilers	EPA Method 6C	6/25/20
Filterable Particulate	gr/dscf @ 3% O ₂	0.0017	0.014	CARB Method 5	6/25/20
Total Particulate	lbs/hr	0.8	20	CARB Method 5	6/25/20
Nonmethane Hydrocarbons	ppm @ 3% O ₂	19.1	191	EPA Method 25A & EPA Method 18	6/25/20
Nonmethane Hydrocarbons	lbs/hr	1.9	89 Total all three boilers	EPA Method 25A & EPA Method 18	6/25/20
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 2020 as the results in 2017 and 2018 were both less than 75% of the limit

2020 H2 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 ₂	639	1696 Three boiler average	EPA Method 10	6/22/20
Carbon Monoxide - CO	lbs/hr	159	793 Total all three boilers	EPA Method 10	6/22/20
Ammonia - NH ₃	ppm @ 3% O ₂	8.5	28	SCAQMD 207.1 Modified	6/22/20
Oxides of Sulfur - SO ₂	ppm @ 3% O ₂	2.9	24	EPA Method 6C	6/22/20
Oxides of Sulfur - SO ₂	lbs/hr	1.6	45 Total all three boilers	EPA Method 6C	6/22/20
Filterable Particulate	gr/dscf @ 3% O ₂	0.0063	0.014	CARB Method 5	6/22/20
Total Particulate	lbs/hr	7.6	20	CARB Method 5	6/22/20
Nonmethane Hydrocarbons	ppm @ 3% O ₂	14.9	191	EPA Method 25A & EPA Method 18	6/22/20
Nonmethane Hydrocarbons	lbs/hr	1.6	89 Total all three boilers	EPA Method 25A & EPA Method 18	6/22/20
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 2020 as the results in 2017 and 2018 were both less than 75% of the limit

2020 H2 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 ₂	660	1696 Three boiler average	EPA Method 10	6/23/20
Carbon Monoxide - CO	lbs/hr	167	793 Total all three boilers	EPA Method 10	6/23/20
Ammonia - NH ₃	ppm @ 3% O ₂	10.6	28	SCAQMD 207.1 Modified	6/23/20
Oxides of Sulfur - SO ₂	ppm @ 3% O ₂	5.2	24	EPA Method 6C	6/23/20
Oxides of Sulfur - SO ₂	lbs/hr	3.0	45 Total all three boilers	EPA Method 6C	6/23/20
Filterable Particulate	gr/dscf @ 3% O ₂	0.0045	0.014	CARB Method 5	6/23/20
Total Particulate	lbs/hr	2.2	20	CARB Method 5	6/23/20
Nonmethane Hydrocarbons	ppm @ 3% O ₂	25.3	191	EPA Method 25A & EPA Method 18	6/23/20
Nonmethane Hydrocarbons	lbs/hr	2.8	89 Total all three boilers	EPA Method 25A & EPA Method 18	6/23/20
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 2020 as the results in 2017 and 2018 were both less than 75% of the limit



DELIVERED by: Email

July 27, 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 June 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 June 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 June is given below.

Boiler #1 -	0.9262518	E+8 pounds
Boiler #2 -	0.5294459	E+8 pounds
Boiler #3 -	0.8718917	E+8 pounds

Fuel stored off-site at the end of the month is listed below. Off-site storage is indefinite.

Burney Yard - Hwy 299, Burney CA	13,018	bone dry tons
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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 NOx and CO 30 DAY Rolling Averages

[illegible]

Table II
Wheelabrator Shasta Energy Company
Boiler Hours

Date	Boiler 1	Boiler 2	Boiler 3
6/1/20	24.0	0.0	24.0
6/2/20	24.0	0.0	24.0
6/3/20	24.0	0.0	24.0
6/4/20	24.0	0.0	24.0
6/5/20	24.0	0.0	24.0
6/6/20	24.0	0.0	24.0
6/7/20	24.0	0.0	24.0
6/8/20	24.0	0.0	24.0
6/9/20	24.0	0.0	24.0
6/10/20	24.0	0.0	24.0
6/11/20	24.0	0.0	24.0
6/12/20	24.0	0.0	24.0
6/13/20	24.0	0.0	24.0
6/14/20	24.0	0.1	24.0
6/15/20	24.0	10.3	24.0
6/16/20	24.0	24.0	24.0
6/17/20	24.0	24.0	24.0
6/18/20	24.0	24.0	24.0
6/19/20	23.1	24.0	24.0
6/20/20	0.0	24.0	24.0
6/21/20	0.0	24.0	24.0
6/22/20	0.0	24.0	24.0
6/23/20	0.0	24.0	24.0
6/24/20	13.2	24.0	12.2
6/25/20	24.0	24.0	0.0
6/26/20	24.0	24.0	0.0
6/27/20	24.0	24.0	0.0
6/28/20	24.0	24.0	0.0
6/29/20	24.0	24.0	0.0
6/30/20	24.0	24.0	0.0
Total Hours	612.2	370.4	564.2

TABLE III
WHEELABRATOR SHASTA ENERGY
ANNUAL CAPACITY FACTOR
(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
6/1/20	500	424,581	590	0.13%	57.0%	57.1%
5/1/20	1,530	419,836	566	0.14%	56.9%	57.1%
4/1/20	2,073	394,165	550	0.13%	57.6%	57.7%
3/1/20	12	425,441	572	0.16%	58.3%	58.4%
2/1/20	512	390,272	561	0.16%	55.5%	55.7%
1/1/20	27	428,155	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			
3/1/19	0	178,080	239			
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			

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	0	NA	0.0
June	0	NA	0.0
July			
August			
September			
October			
November			
December			
YTD	0		0.0

Conversion Factor - 0.6 lb SO2/lb S input

TABLE V

Wheelabrator Shasta Energy Company

NOx and CO Emissions During Startup, Shutdown & Malfunction (Natural Gas Only)

[illegible]

CEMS Downtime

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

[illegible]

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

Wheelabrator Shasta Energy Company



DELIVERED by: Email

August 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 July 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 July 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 July is given below.

Boiler #1 -	0.3910399	E+8 pounds
Boiler #2 -	1.1385231	E+8 pounds
Boiler #3 -	0.7440386	E+8 pounds

Fuel stored off-site at the end of the month is listed below. Off-site storage is indefinite.

Burney Yard - Hwy 299, Burney CA	13,018 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
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
7/1/20	113	0.146	431	114	0.146	318	Not Oper	Not Oper	Not Oper
7/2/20	114	0.146	425	114	0.146	322	Not Oper	Not Oper	Not Oper
7/3/20	113	0.146	426	114	0.146	323	Not Oper	Not Oper	Not Oper
7/4/20	113	0.146	436	114	0.146	326	Not Oper	Not Oper	Not Oper
7/5/20	113	0.146	440	114	0.146	332	Not Oper	Not Oper	Not Oper
7/6/20	113	0.146	442	114	0.146	343	Not Oper	Not Oper	Not Oper
7/7/20	114	0.146	446	114	0.146	349	Not Oper	Not Oper	Not Oper
7/8/20	113	0.146	445	114	0.146	355	Not Oper	Not Oper	Not Oper
7/9/20	113	0.146	442	114	0.146	361	Not Oper	Not Oper	Not Oper
7/10/20	113	0.146	443	114	0.146	366	Not Oper	Not Oper	Not Oper
7/11/20	113	0.146	441	114	0.146	375	Not Oper	Not Oper	Not Oper
7/12/20	Not Oper	Not Oper	Not Oper	114	0.146	386	114	0.146	326
7/13/20	Not Oper	Not Oper	Not Oper	114	0.146	401	114	0.146	325
7/14/20	Not Oper	Not Oper	Not Oper	114	0.146	410	114	0.146	327
7/15/20	Not Oper	Not Oper	Not Oper	114	0.146	417	114	0.146	325
7/16/20	Not Oper	Not Oper	Not Oper	114	0.146	436	114	0.146	328
7/17/20	Not Oper	Not Oper	Not Oper	114	0.146	447	114	0.146	335
7/18/20	Not Oper	Not Oper	Not Oper	114	0.146	452	114	0.146	331
7/19/20	Not Oper	Not Oper	Not Oper	114	0.146	455	114	0.146	331
7/20/20	Not Oper	Not Oper	Not Oper	114	0.146	443	114	0.146	330
7/21/20	Not Oper	Not Oper	Not Oper	114	0.146	436	114	0.146	328
7/22/20	Not Oper	Not Oper	Not Oper	114	0.146	414	114	0.146	324
7/23/20	Not Oper	Not Oper	Not Oper	114	0.146	416	114	0.146	328
7/24/20	Not Oper	Not Oper	Not Oper	114	0.146	414	114	0.146	331
7/25/20	Not Oper	Not Oper	Not Oper	114	0.146	417	114	0.146	332
7/26/20	Not Oper	Not Oper	Not Oper	114	0.146	414	114	0.146	331
7/27/20	Not Oper	Not Oper	Not Oper	114	0.146	421	114	0.146	334
7/28/20	Not Oper	Not Oper	Not Oper	114	0.146	433	114	0.146	339
7/29/20	Not Oper	Not Oper	Not Oper	114	0.146	435	114	0.146	337
7/30/20	Not Oper	Not Oper	Not Oper	114	0.146	442	114	0.146	344
7/31/20	Not Oper	Not Oper	Not Oper	114	0.146	453	114	0.146	345

Table II
Wheelabrator Shasta Energy Company
Boiler Hours

Date	Boiler 1	Boiler 2	Boiler 3
7/1/20	24.0	24.0	0.0
7/2/20	24.0	24.0	0.0
7/3/20	24.0	24.0	0.0
7/4/20	24.0	24.0	0.0
7/5/20	24.0	24.0	0.0
7/6/20	24.0	24.0	0.0
7/7/20	24.0	24.0	0.0
7/8/20	24.0	24.0	0.0
7/9/20	24.0	24.0	0.0
7/10/20	24.0	24.0	0.0
7/11/20	16.2	23.8	0.0
7/12/20	0.0	18.4	11.6
7/13/20	0.0	24.0	24.0
7/14/20	0.0	24.0	24.0
7/15/20	0.0	24.0	24.0
7/16/20	0.0	24.0	24.0
7/17/20	0.0	24.0	24.0
7/18/20	0.0	24.0	24.0
7/19/20	0.0	24.0	24.0
7/20/20	0.0	15.7	14.1
7/21/20	0.0	24.0	24.0
7/22/20	0.0	24.0	24.0
7/23/20	0.0	24.0	24.0
7/24/20	0.0	24.0	24.0
7/25/20	0.0	24.0	24.0
7/26/20	0.0	24.0	24.0
7/27/20	0.0	24.0	24.0
7/28/20	0.0	24.0	24.0
7/29/20	0.0	24.0	24.0
7/30/20	0.0	24.0	24.0
7/31/20	0.0	24.0	24.0
Total Hours	256.2	730.0	457.7

TABLE III
WHEELABRATOR SHASTA ENERGY
ANNUAL CAPACITY FACTOR
(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
7/1/20	964	387,875	523	0.14%	56.2%	56.3%
6/1/20	573	439,876	612	0.13%	57.6%	57.7%
5/1/20	1,530	456,537	616	0.14%	57.3%	57.5%
4/1/20	2,073	394,165	550	0.13%	57.6%	57.7%
3/1/20	12	425,441	572	0.16%	58.3%	58.4%
2/1/20	512	390,272	561	0.16%	55.5%	55.7%
1/1/20	27	428,155	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			
4/1/19	4,646	453,571	636			
3/1/19	0	178,080	239			
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			

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	0	NA	0.0
June	0	NA	0.0
July	0	NA	0.0
August			
September			
October			
November			
December			
YTD	0		0.0

Conversion Factor - 0.6 lb SO2/lb S input

Wheelabrator Shasta Energy Company

NOx and CO Emissions During Startup, Shutdown & Malfunction (Natural Gas Only)

[illegible]

CEMS Downtime

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

[illegible]

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

Wheelabrator Shasta Energy Company

There were no emission exceedances this month

[illegible]



DELIVERED by: Email

September 24, 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 August 2020,
Title V Operating Permit 86-TV-08i and Permits to Operate No. 86-PO-08o and 89-PO-04f.**

Dear Mr. Hellman:

Attached you will find the August 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 August is given below.

Boiler #1 -	0.4037747	E+8 pounds
Boiler #2 -	1.2088149	E+8 pounds
Boiler #3 -	1.0537988	E+8 pounds

Fuel stored off-site at the end of the month is listed below. Off-site storage is indefinite.
Burney Yard - Hwy 299, Burney CA 13,018 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 Pile Survey Results

WHEELABRATOR SHASTA ENERGY
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
8/1/20	Not Oper	Not Oper	Not Oper	114	0.146	463	114	0.146	346
8/2/20	Not Oper	Not Oper	Not Oper	114	0.146	471	114	0.146	356
8/3/20	Not Oper	Not Oper	Not Oper	114	0.146	474	114	0.146	365
8/4/20	Not Oper	Not Oper	Not Oper	114	0.146	476	114	0.146	370
8/5/20	Not Oper	Not Oper	Not Oper	114	0.146	483	114	0.146	377
8/6/20	Not Oper	Not Oper	Not Oper	114	0.146	484	114	0.146	375
8/7/20	Not Oper	Not Oper	Not Oper	114	0.146	488	114	0.146	377
8/8/20	Not Oper	Not Oper	Not Oper	114	0.146	494	114	0.146	379
8/9/20	Not Oper	Not Oper	Not Oper	114	0.146	500	113	0.146	376
8/10/20	Not Oper	Not Oper	Not Oper	114	0.146	500	113	0.146	373
8/11/20	Not Oper	Not Oper	Not Oper	113	0.146	498	113	0.146	376
8/12/20	Not Oper	Not Oper	Not Oper	113	0.146	495	113	0.146	377
8/13/20	Not Oper	Not Oper	Not Oper	113	0.146	495	113	0.146	375
8/14/20	Not Oper	Not Oper	Not Oper	113	0.146	494	113	0.146	378
8/15/20	Not Oper	Not Oper	Not Oper	113	0.146	484	114	0.146	373
8/16/20	Not Oper	Not Oper	Not Oper	113	0.146	481	113	0.146	368
8/17/20	113	0.146	444	113	0.146	477	113	0.146	371
8/18/20	Not Oper	Not Oper	Not Oper	113	0.146	480	114	0.146	373
8/19/20	113	0.146	444	113	0.146	479	114	0.146	377
8/20/20	Not Oper	Not Oper	Not Oper	113	0.146	482	113	0.146	383
8/21/20	113	0.146	444	113	0.146	497	114	0.146	392
8/22/20	113	0.146	457	113	0.146	500	114	0.146	397
8/23/20	113	0.146	451	113	0.146	505	114	0.146	400
8/24/20	113	0.146	451	113	0.146	510	113	0.146	405
8/25/20	113	0.146	448	113	0.146	514	113	0.146	406
8/26/20	113	0.146	453	113	0.146	514	Not Oper	Not Oper	Not Oper
8/27/20	113	0.146	449	113	0.146	505	Not Oper	Not Oper	Not Oper
8/28/20	113	0.146	467	113	0.146	512	113	0.146	404
8/29/20	113	0.146	478	113	0.146	510	113	0.146	407
8/30/20	113	0.146	491	113	0.146	506	113	0.146	409
8/31/20	113	0.146	502	113	0.146	500	113	0.146	406

Table II
Wheelabrator Shasta Energy Company
Boiler Hours

Date	Boiler 1	Boiler 2	Boiler 3
8/1/20	0.0	24.0	24.0
8/2/20	0.0	24.0	24.0
8/3/20	0.0	24.0	24.0
8/4/20	0.0	24.0	24.0
8/5/20	0.0	24.0	24.0
8/6/20	0.0	24.0	24.0
8/7/20	0.0	24.0	24.0
8/8/20	0.0	24.0	24.0
8/9/20	0.0	24.0	24.0
8/10/20	0.0	24.0	24.0
8/11/20	0.0	24.0	24.0
8/12/20	0.0	24.0	24.0
8/13/20	0.0	24.0	24.0
8/14/20	0.0	24.0	24.0
8/15/20	0.0	24.0	24.0
8/16/20	0.0	24.0	24.0
8/17/20	0.2	24.0	24.0
8/18/20	0.0	24.0	24.0
8/19/20	0.3	24.0	24.0
8/20/20	0.0	24.0	24.0
8/21/20	3.5	24.0	24.0
8/22/20	24.0	24.0	24.0
8/23/20	24.0	24.0	24.0
8/24/20	24.0	24.0	24.0
8/25/20	24.0	24.0	8.2
8/26/20	24.0	24.0	0.0
8/27/20	24.0	24.0	0.0
8/28/20	24.0	24.0	0.2
8/29/20	24.0	24.0	6.7
8/30/20	24.0	24.0	24.0
8/31/20	24.0	24.0	24.0
Total Hours	244.0	744.0	639.1

TABLE III
WHEELABRATOR SHASTA ENERGY
ANNUAL CAPACITY FACTOR
(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
8/1/20	918	428,287	577	0.09%	57.2%	57.3%
7/1/20	964	387,875	523	0.14%	56.2%	56.3%
6/1/20	573	439,876	612	0.13%	57.6%	57.7%
5/1/20	1,530	456,537	616	0.14%	57.3%	57.5%
4/1/20	2,073	394,165	550	0.13%	57.6%	57.7%
3/1/20	12	425,441	572	0.16%	58.3%	58.4%
2/1/20	512	390,272	561	0.16%	55.5%	55.7%
1/1/20	27	428,155	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			
5/1/19	825	481,310	648			
4/1/19	4,646	453,571	636			
3/1/19	0	178,080	239			
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			

Table IV
Wheelabrator Shasta Energy Company
Estimated Use and Emissions from Fuel Cubes and Cardboard

Month	Fuel Cubes and Cardboard Dry tons	Sulfur Content %
January	Not Used	
February	Not Used	
March	Not Used	
April	Not Used	
May	Not Used	
June	Not Used	
July	Not Used	
August	Not Used	
September		
October		
November		
December		
YTD	0	-

Wheelabrator Shasta Energy Company

NOx and CO Emissions During Startup, Shutdown & Malfunction (Natural Gas Only)

[illegible]

CEMS Downtime

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

[illegible]

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

Wheelabrator Shasta Energy Company

There were no emission exceedances this month

[illegible]



DELIVERED by: Email

October 23, 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 September 2020, Title V Operating Permit 86-TV-08i and Permits to Operate No. 86-PO-08o and 89-PO-04f.

Dear Mr. Hellman:

Attached you will find the September 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 September is given below.

Boiler #1 -	0.4037747	E+8 pounds
Boiler #2 -	1.2088149	E+8 pounds
Boiler #3 -	1.0537988	E+8 pounds

Fuel stored off-site at the end of the month is listed below. Off-site storage is indefinite.

Burney Yard - Hwy 299, Burney CA	13,018	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 Pile Survey Results
 Quarterly CGA and Opacity Audit Reports

WHEELABRATOR SHASTA ENERGY NOx and CO 30 DAY Rolling Averages

[illegible]

Table II
Wheelabrator Shasta Energy Company
Boiler Hours

Date	Boiler 1	Boiler 2	Boiler 3
9/1/20	24.0	24.0	24.0
9/2/20	24.0	24.0	24.0
9/3/20	24.0	24.0	24.0
9/4/20	24.0	24.0	24.0
9/5/20	24.0	24.0	24.0
9/6/20	24.0	24.0	24.0
9/7/20	8.4	24.0	24.0
9/8/20	24.0	24.0	24.0
9/9/20	24.0	24.0	24.0
9/10/20	24.0	21.6	24.0
9/11/20	24.0	24.0	24.0
9/12/20	24.0	24.0	24.0
9/13/20	24.0	24.0	24.0
9/14/20	24.0	24.0	24.0
9/15/20	24.0	24.0	24.0
9/16/20	24.0	24.0	24.0
9/17/20	24.0	24.0	24.0
9/18/20	24.0	24.0	24.0
9/19/20	24.0	24.0	24.0
9/20/20	24.0	24.0	24.0
9/21/20	24.0	24.0	24.0
9/22/20	24.0	24.0	24.0
9/23/20	24.0	24.0	24.0
9/24/20	24.0	21.9	24.0
9/25/20	24.0	24.0	24.0
9/26/20	24.0	24.0	24.0
9/27/20	24.0	24.0	24.0
9/28/20	24.0	24.0	24.0
9/29/20	24.0	24.0	24.0
9/30/20	24.0	24.0	24.0
Total Hours	704.4	715.5	720.0

TABLE III
WHEELABRATOR SHASTA ENERGY
ANNUAL CAPACITY FACTOR
(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
9/1/20	315	437,956	609	0.09%	57.0%	57.1%
8/1/20	918	428,287	577	0.09%	57.2%	57.3%
7/1/20	964	387,875	523	0.14%	56.2%	56.3%
6/1/20	573	439,876	612	0.13%	57.6%	57.7%
5/1/20	1,530	456,537	616	0.14%	57.3%	57.5%
4/1/20	2,073	394,165	550	0.13%	57.6%	57.7%
3/1/20	12	425,441	572	0.16%	58.3%	58.4%
2/1/20	512	390,272	561	0.16%	55.5%	55.7%
1/1/20	27	428,155	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			
6/1/19	1,346	416,668	581			
5/1/19	825	481,310	648			
4/1/19	4,646	453,571	636			
3/1/19	0	178,080	239			
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			

Table IV
Wheelabrator Shasta Energy Company
Estimated Use and Emissions from Fuel Cubes and Cardboard

Month	Fuel Cubes and Cardboard Dry tons	Sulfur Content %
January	Not Used	
February	Not Used	
March	Not Used	
April	Not Used	
May	Not Used	
June	Not Used	
July	Not Used	
August	Not Used	
September	Not Used	
October		
November		
December		
YTD	0	-

Wheelabrator Shasta Energy Company

NOx and CO Emissions During Startup, Shutdown & Malfunction (Natural Gas Only)

[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
2	9/1/20 12:00 AM	9/2/20 7:59 AM	NOXR - OOC - Chiller frozen, replace part, check for leaks, ran cal
2	9/1/20 6:00 AM	9/2/20 7:59 AM	COR - OOC - Chiller frozen, replace part, check for leaks, ran cal
2	9/1/20 6:00 AM	9/1/20 7:59 AM	COM - Leak in system, repair leak, ran cal
2	9/2/20 6:00 AM	9/2/20 7:59 AM	COM - OOC - Chiller frozen, replace part, check for leaks, ran cal
1	9/2/20 6:30 AM	9/2/20 9:47 AM	OPAC - Quarterly Audit
2	9/2/20 9:48 AM	9/2/20 1:29 PM	OPAC - Quarterly Audit
1	9/2/20 11:00 AM	9/2/20 11:59 AM	NOXR - Quarterly Audit
1	9/2/20 11:00 AM	9/2/20 11:59 AM	COR - Quarterly Audit
1	9/2/20 11:00 AM	9/2/20 11:59 AM	COM - Quarterly Audit
2	9/2/20 12:00 PM	9/2/20 1:59 PM	NOXR - Quarterly Audit
2	9/2/20 12:00 PM	9/2/20 1:59 PM	COR - Quarterly Audit
2	9/2/20 12:00 PM	9/2/20 1:59 PM	COM - Quarterly Audit
3	9/3/20 6:18 AM	9/3/20 9:05 AM	OPAC - Quarterly Audit
1	9/10/20 9:00 AM	9/10/20 9:59 AM	NOXR - Changed cold and hot scrubbers, checked for leaks, ran cal
1	9/10/20 9:00 AM	9/10/20 9:59 AM	COR - Changed cold and hot scrubbers, checked for leaks, ran cal
1	9/10/20 9:00 AM	9/10/20 9:59 AM	COM - Changed cold and hot scrubbers, checked for leaks, ran cal
2	9/10/20 2:00 PM	9/10/20 2:59 PM	NOXR - Changed cold and hot scrubbers, checked for leaks, ran cal
2	9/10/20 2:00 PM	9/10/20 2:59 PM	COR - Changed cold and hot scrubbers, checked for leaks, ran cal
2	9/10/20 2:00 PM	9/10/20 2:59 PM	COM - Changed cold and hot scrubbers, checked for leaks, ran cal
1	9/14/20 7:36 AM	9/14/20 8:17 AM	OPAC - Cleaned Lenses, checked alignment, ran cal
2	9/14/20 8:18 AM	9/14/20 1:17 PM	OPAC - Cleaned Lenses, checked alignment, ran cal
3	9/14/20 1:18 PM	9/14/20 2:59 PM	OPAC - Cleaned Lenses, checked alignment, ran cal
3	9/15/20 8:30 AM	9/15/20 9:11 AM	OPAC - Cleaned Lenses, changed blower filter, checked alignment, ran cal
3	9/15/20 1:00 PM	9/15/20 1:29 PM	OPAC - Check and adjust system settings, ran cal
2	9/17/20 7:00 AM	9/18/20 2:59 PM	NOXR - OOC - Leaks in system found and fixed, ran cal
2	9/17/20 7:00 AM	9/18/20 2:59 PM	COR - OOC - Leaks in system found and fixed, ran cal
2	9/17/20 7:00 AM	9/18/20 2:59 PM	COM - OOC - Leaks in system found and fixed, ran cal
3	9/29/20 7:30 AM	9/29/20 3:23 PM	OPAC - Loaner monitor installed and certified; Monitor sent back to manufacturer for non-critical warranty repairs

Continues on Next Page

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

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

[illegible]

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
0.00	0.00
0.01	0.01
0.02	0.02
0.03	0.03
0.04	0.04
0.05	0.05
0.06	0.06
0.07	0.07
0.08	0.08
0.09	0.09
0.10	0.10
0.11	0.11
0.12	0.12
0.13	0.13
0.14	0.14
0.15	0.15
0.16	0.16
0.17	0.17
0.18	0.18
0.19	0.19
0.20	0.20
0.21	0.21
0.22	0.22
0.23	0.23
0.24	0.24
0.25	0.25
0.26	0.26
0.27	0.27
0.28	0.28
0.29	0.29
0.30	0.30
0.31	0.31
0.32	0.32
0.33	0.33
0.34	0.34
0.35	0.35
0.36	0.36
0.37	0.37
0.38	0.38
0.39	0.39
0.40	0.40
0.41	0.41
0.42	0.42
0.43	0.43
0.44	0.44
0.45	0.45
0.46	0.46
0.47	0.47
0.48	0.48
0.49	0.49
0.50	0.50
0.51	0.51
0.52	0.52
0.53	0.53
0.54	0.54
0.55	0.55
0.56	0.56
0.57	0.57
0.58	0.58
0.59	0.59
0.60	0.60
0.61	0.61
0.62	0.62
0.63	0.63
0.64	0.64
0.65	0.65
0.66	0.66
0.67	0.67
0.68	0.68
0.69	0.69
0.70	0.70
0.71	0.71
0.72	0.72
0.73	0.73
0.74	0.74
0.75	0.75
0.76	0.76
0.77	0.77
0.78	0.78
0.79	0.79
0.80	0.80
0.81	0.81
0.82	0.82
0.83	0.83
0.84	0.84
0.85	0.85
0.86	0.86
0.87	0.87
0.88	0.88
0.89	0.89
0.90	0.90
0.91	0.91
0.92	0.92
0.93	0.93
0.94	0.94
0.95	0.95
0.96	0.96
0.97	0.97
0.98	0.98
0.99	0.99
1.00	1.00

Wheelabrator Shasta Energy Company

There were no emission exceedances this month

[illegible]



DELIVERED by: Email

November 18, 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 October 2020, Title V Operating Permit 86-TV-08i and Permits to Operate No. 86-PO-08o and 89-PO-04f.

Dear Mr. Hellman:

Attached you will find the October 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 October is given below.

Boiler #1 -	0.670566	E+8 pounds
Boiler #2 -	0.9644756	E+8 pounds
Boiler #3 -	1.0066173	E+8 pounds

Fuel stored off-site at the end of the month is listed below. Off-site storage is indefinite.

Burney Yard - Hwy 299, Burney CA	13,018	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 blue ink, appearing to read "Bryan Booth", is written over a light blue circular stamp.

Bryan Booth
Plant Manager

enc Tables I through Table VII
 Fuel Pile Survey Results

WHEELABRATOR SHASTA ENERGY
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
10/1/20	113	0.146	258	113	0.146	210	114	0.146	281
10/2/20	113	0.146	265	113	0.145	216	114	0.146	287
10/3/20	113	0.146	254	113	0.145	220	114	0.146	291
10/4/20	113	0.146	253	113	0.145	221	114	0.146	292
10/5/20	113	0.146	241	113	0.145	217	114	0.146	286
10/6/20	113	0.146	228	113	0.145	212	114	0.146	281
10/7/20	113	0.146	223	113	0.146	203	114	0.146	272
10/8/20	113	0.146	224	113	0.145	206	114	0.146	272
10/9/20	113	0.146	227	113	0.145	209	114	0.146	274
10/10/20	113	0.146	227	113	0.145	213	113	0.146	273
10/11/20	113	0.146	235	113	0.145	218	113	0.146	270
10/12/20	113	0.146	238	113	0.145	224	113	0.146	275
10/13/20	113	0.146	239	113	0.145	230	113	0.146	282
10/14/20	113	0.146	244	113	0.145	238	113	0.146	287
10/15/20	113	0.146	247	113	0.145	244	113	0.146	289
10/16/20	113	0.146	249	113	0.145	247	113	0.146	284
10/17/20	113	0.146	247	113	0.145	250	113	0.146	278
10/18/20	113	0.146	244	113	0.145	254	113	0.146	279
10/19/20	113	0.146	247	113	0.145	261	113	0.146	282
10/20/20	113	0.146	243	113	0.145	260	113	0.146	277
10/21/20	113	0.146	243	113	0.145	258	113	0.146	277
10/22/20	113	0.146	244	113	0.145	257	113	0.146	283
10/23/20	113	0.146	240	113	0.145	256	113	0.146	282
10/24/20	113	0.146	230	113	0.145	254	113	0.146	276
10/25/20	113	0.146	235	113	0.145	264	113	0.146	283
10/26/20	Not Oper	Not Oper	Not Oper	113	0.145	271	113	0.146	283
10/27/20	Not Oper	Not Oper	Not Oper	113	0.145	284	113	0.146	291
10/28/20	Not Oper	Not Oper	Not Oper	113	0.145	295	113	0.146	291
10/29/20	Not Oper	Not Oper	Not Oper	113	0.145	302	113	0.146	292
10/30/20	Not Oper	Not Oper	Not Oper	113	0.145	319	113	0.146	295
10/31/20	Not Oper	Not Oper	Not Oper	113	0.145	332	113	0.146	302

Table II
Wheelabrator Shasta Energy Company
Boiler Hours

Date	Boiler 1	Boiler 2	Boiler 3
10/1/20	24.0	24.0	24.0
10/2/20	24.0	24.0	24.0
10/3/20	24.0	24.0	24.0
10/4/20	24.0	24.0	24.0
10/5/20	24.0	24.0	24.0
10/6/20	24.0	24.0	24.0
10/7/20	24.0	24.0	24.0
10/8/20	24.0	24.0	24.0
10/9/20	24.0	24.0	24.0
10/10/20	24.0	24.0	24.0
10/11/20	24.0	24.0	24.0
10/12/20	24.0	24.0	24.0
10/13/20	24.0	24.0	24.0
10/14/20	24.0	24.0	24.0
10/15/20	24.0	24.0	24.0
10/16/20	24.0	24.0	24.0
10/17/20	24.0	24.0	24.0
10/18/20	24.0	24.0	24.0
10/19/20	24.0	24.0	24.0
10/20/20	24.0	24.0	24.0
10/21/20	24.0	24.0	24.0
10/22/20	24.0	24.0	24.0
10/23/20	24.0	24.0	24.0
10/24/20	24.0	24.0	24.0
10/25/20	3.0	24.0	24.0
10/26/20	0.0	24.0	24.0
10/27/20	0.0	24.0	24.0
10/28/20	0.0	24.0	24.0
10/29/20	0.0	24.0	24.0
10/30/20	0.0	24.0	24.0
10/31/20	0.0	24.0	24.0
Total Hours	579.0	744.0	744.0

TABLE III
WHEELABRATOR SHASTA ENERGY
ANNUAL CAPACITY FACTOR
(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
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4/1/20	2,073	394,165	550	0.13%	57.6%	57.7%
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1/1/20	27	428,155	576	0.28%	55.2%	55.4%
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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			

Table IV
Wheelabrator Shasta Energy Company
Estimated Use and Emissions from Fuel Cubes and Cardboard

Month	Fuel Cubes and Cardboard Dry tons	Sulfur Content %
January	Not Used	
February	Not Used	
March	Not Used	
April	Not Used	
May	Not Used	
June	Not Used	
July	Not Used	
August	Not Used	
September	Not Used	
October	Not Used	
November		
December		
YTD	0	-

Wheelabrator Shasta Energy Company

No Startup, Shutdown or Malfunction emissions to Report

[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

[illegible]

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
0.00	0.00
0.05	0.05
0.10	0.10
0.15	0.15
0.20	0.20
0.25	0.25
0.30	0.30
0.35	0.35
0.40	0.40
0.45	0.45
0.50	0.50
0.55	0.55
0.60	0.60
0.65	0.65
0.70	0.70
0.75	0.75
0.80	0.80
0.85	0.85
0.90	0.90
0.95	0.95
1.00	1.00

Wheelabrator Shasta Energy Company

There were no emission exceedances this month

[illegible]

PACIFIC GAS AND ELECTRIC COMPANY

ATTACHMENT 3

Burney Forest Products Air Quality Attestation

APPENDIX C
AIR QUALITY ATTESTATION

[VIA ELECTRONIC SUBMISSION]



December 3, 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 May 1, 2020 and ending October 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, except for one six-hour period May 26-27, 2020.
3. List of non-compliance: On May 26-27, 2020, there were two consecutive 3-hr NO_x lb/MMBtu averages which exceeded the applicable permitted limit. This is detailed on the accompanying annual/semiannual compliance report. The issue was reported to SCAQMD, and SCAQMD issued an NOV in October 2020, which was promptly paid.

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	December 3, 2020

PACIFIC GAS AND ELECTRIC COMPANY

ATTACHMENT 4

**Burney Forest Products Annual Certification
Report and Monthly Emissions Report**



November 11, 2020

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

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

Dear Mr. Salazar:

In accordance with Condition 24 of the referenced permit, enclosed please find Burney Forest Product's annual certification. This submittal covers the time period from October 14, 2019 through October 13, 2020 and was prepared using the forms specified by the Shasta County Air Quality Management District.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "John Christian". The signature is fluid and cursive, with a large initial "J".

John Christian
Asset Manager, Responsible Official

Enclosures

cc: Lindsey Welch, SCAQMD
Bill Dillard, Burney Forest Products (email)

File 201-40-09



November 11, 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 and Annual Certification Report
Burney Forest Products Title V Operating Permit # 87-TV-27n**

Dear Ms. Welch:

In accordance with Conditions 24 of the referenced permit, enclosed please find Burney Forest Product's completed annual certification and Semi-Annual Monitoring Report. This submittal covers the time period from October 14, 2019 through October 13, 2020 reporting period and was prepared using the forms specified by the Shasta County Air Quality Management District.

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

Sincerely,

John Christian
Asset Manager, Responsible Official

Enclosures

cc: Matthew Salazar, US EPA Region IX
Bill Dillard, Burney Forest Products (email)

File 201-40-09

CERTIFICATION REPORT

(FORM 5-K1)

DISTRICT: Shasta County AQMD	< DISTRICT USE ONLY =
	DISTRICT ID:
COMPANY NAME: Burney Forest Products, a Joint Venture	FACILITY NAME: Burney Forest 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 October 13, 2020
2. Due date for submittal of report: November 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)

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

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

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

V. COMPLIANCE CERTIFICATION

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



Yes



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

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

Signature of Responsible Official

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)

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

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

DEVIATION REPORT

(FORM 5-L)

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

I. DEVIATION INFORMATION

1. Permit number(s) of emission unit or control unit affected: 87-TV-27n
2. Description of deviation: NOx 3-hr Limit Exceedance
3. Description and identification of permit condition(s) deviated: Condition 11d – Oxides of Nitrogen shall not exceed the following emissions limits when burning: Wood Only: 0.12 pounds per million Btu heat input, based on a block three-hour averaging period, or 57.4 pounds per hour total for both boilers.
4. Associated equipment and equipment operation (if any): Boiler #1
5. Date and time when deviation was discovered: May 27, 2020, shortly after 01:00. SCAQMD was notified that morning.
6. Date, time and duration of deviation: Between 5/26/20 19:00 through 5/27/20 00:59. Duration was approx. 6 hours.
7. Probable cause of deviation: The Control Room Operator (CRO) manually left the Mix button on while manually controlling the NOx according to Mix fuel limits, when it was in wood-fire mode, and then went off shift. The next shift CRO began his shift and continued running the boilers with the existing settings and ramped up the boiler in accordance with BFP's contracted daily generation profile. The boiler ran in this full load state with the Mix fuel firing buttons and ammonia control settings in manual mode for the next six hours, until it was noticed by the operator, and the settings were changed back to auto and adjusted for Wood-only mode.
8. Preventive or corrective action taken: Upon investigation of the incident, BFP determined the CRO continued to operate in manual mixed-fuel firing mode due to not noticing a more visible reminder that he was operating in mixed-fuel firing mode. BFP determined that using a visible reminder when in manual mixed fuel firing mode would help to prevent this issue happening again in the future. Therefore, a tag was created and placed on the DAHS monitor as a visible reminder to the CRO that the mixed fuel firing mode is manually engaged. SCAQMD issued a Notice of Violation (NOV) V20-0456 for this exceedance in October 2020. The NOV penalty was promptly paid.

DEVIATION REPORT

(FORM 5-L)

DISTRICT: Shasta County AQMD	< DISTRICT USE ONLY =
	DISTRICT ID:
COMPANY NAME: Burney Forest Products, a Joint Venture	FACILITY NAME: Burney Forest 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: June 17, 2020 at approximately 13:00 hours; Reported to the District on June 17, 2020.
6. Date, time and duration of deviation: June 17, 2020 at approximately 13:00 hours, until approximately 16:15 when the boiler began to be shut down. Duration was approximately 3.25 hours.
7. Probable cause of deviation: At around 13:00 hours, the Operator noticed Boiler #1 ESP TR-1A had tripped off and would not restart. The fault was caused by a warped plate in the ESP. Despite losing this ESP zone during this, 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-1A zone, and shut down Boiler #1 and ESP#1 for repairs on June 17, 2020. Repairs were made, TR-1A became functional and the boiler was started back up on June 18, 2020 at approximately 14:00.



July 27, 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 – May 2020**
Burney Forest Products

Dear Ms. Welch,

Pursuant to Title V Operating Permit 87-TV-27n, Condition 20, enclosed please find this revised version of the May 2020 *Monthly Emissions Report* for Burney Forest Products (BFP). This revision was necessary to correct an error in the CEMS/COMS Downtime section.

As noted in the Excess Emission Summary section of this report, on May 27, 2020 Burney Forest Products (BFP) submitted an initial notification via e-mail that for Boiler 1 there was a potential exceedance over the NO_x lb/MMBtu permitted emission limit for wood fuel. Upon further review of the operating and emissions data, BFP confirmed that actual emissions during two three-hour block periods did exceed the permit emission limit. Following is the resulting emissions.

Pollutant	Avg. Period	Emission Limit	Actual Emissions	Excess Emissions	Block Period (Pacific Time)
NO _x lb/mmBtu	3-hr block	0.12	0.135	0.015	19:00 – 21:59
NO _x lb/mmBtu	3-hr block	0.12	0.136	0.016	22:00 – 00:59

Initial Conditions:

Both Boilers 1 and 2 were in normal operations mode firing solid fuel (wood only) with NO_x emission controls systems in automatic control.

Sequence of Events:

BFP's Data Acquisition and Handling System (DAHS) is set up to automatically detect whether boiler operators are firing with wood, gas, or mixed fuel. The DAHS is also programmed with a button that can be manually pressed to indicate that a mixed fuel combination is being used in cases where fuel feed rates are close to or below the automatic trigger points. The ammonia injection control system settings are adjusted based on the fuel firing mode being used at the time.

On May 26, 2020, at around 17:00 hours, after cleaning grates on Boiler 1 using natural gas, the gas burner shut off. The Control Room Operator (CRO) had engaged the manual mixed fuel firing mode button on the DAHS and neglected to shut it off after the gas burner shut off. The ammonia injection control had previously been adjusted to account for the mixed fuel firing mode. These settings remained after the gas burner shut off until the end of the operator's shift (19:00) and into the next operator's shift.

After the first operator finished their shift and left, the second operator continued running the boilers with the existing settings and ramped up the boiler in accordance with BFP's contracted daily generation profile. The boiler ran in this full load state with the previous mixed fuel firing button and ammonia control settings for the next six hours, until midnight was reached on the DAHS (01:00 Pacific Time). At this point, the operator noticed the ammonia control settings and the manually-engaged mixed fuel firing button. He disengaged the mixed fuel firing button and adjusted the ammonia control settings for wood fuel only firing mode.

Cause of the Malfunction/Excess Emissions Event

Upon investigation of the incident, BFP determined the operator continued to operate in manual mixed-fuel firing mode due to not noticing a more visible reminder that he was operating in mixed-fuel firing mode. BFP determined that using a visible reminder when in manual mixed fuel firing mode would help to prevent this issue happening again in the future. Therefore, a tag was created and placed on the DAHS monitor as a visible reminder to the CRO that the mixed fuel firing mode is manually engaged.

Corrective Measures

BFP has implemented the following corrective measures to prevent a recurrence.

- A visible tag was created and placed on the DAHS monitor which will be used as a visible reminder to the CRO that the mixed fuel firing mode is manually engaged.

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
May 2020

EXCESS EMISSION SUMMARY			
Parameter	Limit	Averaging Period	Excursions
CO – Gas	400 ppm@3% O ₂	24-hr Block Avg (Calendar Day)	None
CO - Wood	1,200 ppm@12% CO ₂	24-hr Block Avg (Calendar Day)	None
NO _x – Gas	70 ppm@3% O ₂	3-hr Block Avg	None
NO _x – Gas	0.084 lb/mmBtu	3-hr Block Avg	None
NO _x – Wood	0.12 lb/mmBtu	3-hr Block Avg	Two (2) excess emission events for two (2) three-hour block periods on 5/26/20 (19:00–00:59 hrs). See cover letter for more details.
NO _x – Mixed Fuel – Boiler 1	0.145 lb/mmBtu	3-hr Block Avg	None
NO _x – Mixed Fuel – Boiler 2	0.146 lb/mmBtu	3-hr Block Avg	None
NO _x – All Fuels	57.4 lb/hr (both boilers combined)	1-hr Total	None
NO _x – All Fuels	250 ppm@12% CO ₂	1-hr Avg	None
Opacity	20%	6-min Avg	None
Opacity	40%	3-min aggr./hr	None

CEMS/COMS DOWNTIME PERIODS	
NO_x	
Boiler 1	On 5/3/2020: Ten (10) hours of downtime due to PG&E line trip and issues caused due to the line trip.
Boiler 1	On 5/14/2020: One (1) hour of downtime due to PG&E line trip and issues caused due to the line trip.
Boiler 2	None
CO	
Boiler 1	On 5/3/2020: Ten (10) hours of downtime due to PG&E line trip and issues caused due to the line trip.
Boiler 1	On 5/14/2020: One (1) hour of downtime due to PG&E line trip and issues caused due to the line trip.
Boiler 2	On 5/3/2020: Nine (9) hours of downtime due to PG&E line trip and issues caused due to the line trip.
CO₂	
Boiler 1	On 5/3/2020: Ten (10) hours of downtime due to PG&E line trip and issues caused due to the line trip.

CEMS/COMS DOWNTIME PERIODS	
Boiler 1	On 5/14/2020: One (1) hour of downtime due to PG&E line trip and issues caused due to the line trip.
Boiler 2	On 5/3/2020: Nine (9) hours of downtime due to PG&E line trip and issues caused due to the line trip.
O2	
Boiler 1	On 5/3/2020: Ten (10) hours of downtime due to PG&E line trip and issues caused due to the line trip.
Boiler 1	On 5/14/2020: One (1) hour of downtime due to PG&E line trip and issues caused due to the line trip.
Boiler 2	None
OPACITY	
Boiler 1	On 5/3/20: Six (6) six-minute periods (12-minutes) of downtime due to line trip.
Boiler 1	On 5/14/20: Four (4) six-minute periods (12-minutes) of downtime due to line trip.
Boiler 2	On 5/14/20 – 5/15/20: 167 six-minute periods (1002-minutes) of downtime due to sample system malfunction caused from the COMS lens being obstructed by ash which had been released during the line trip. The lens was cleaned off the next day.
Boiler 2	On 5/15/20: Eleven (11) six-minute periods (12-minutes) of downtime due to corrective maintenance to correct a COMS lens obstruction.

OPERATING DATA	
Ammonia Usage (Pounds)	
Boiler 1	21,796
Boiler 2	40,823
Total Both Boilers	62,619
Boiler Operating Time (Hours)	
Boiler 1	737
Boiler 2	689

BOILER OFF LINE TIMES				
Boiler 1				
Boiler Off line		Boiler On line		Cause
Date	Time off	Date	Time on	
5/3/20	06:11	5/3/20	12:58	Offline due to PG&E line trip, Black Plant & issues caused by the line trip.
5/3/20	16:39	5/3/20	18:52	Offline due to issues caused by the line trip.
5/14/20	07:52	5/14/20	12:54	Offline due to PG&E line trip, Black Plant
Boiler 2				
Boiler Off line		Boiler On line		Cause
Date	Time off	Date	Time on	
5/3/20	06:11	5/3/20	10:45	Offline due to PG&E line trip, Black Plant
5/5/20	11:38	5/7/20	07:21	Offline due to unscheduled maintenance to repair boiler tube leak
5/14/20	07:52	5/14/20	15:29	Offline due to PG&E line trip, Black Plant

Note: Boiler Off Line Times are in Pacific time



July 28, 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 – June 2020**
Burney Forest Products

Dear Ms. Welch,

Pursuant to Title V Operating Permit 87-TV-27n, Condition 20, enclosed please find the June 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', written over a horizontal line.

Bill Dillard
Plant Manager

Cc: John Christian (email)

File: 201-40-03

BURNEY FOREST PRODUCTS
Monthly Emissions Report
June 2020

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

CEMS/COMS DOWNTIME PERIODS	
NO_x	
Boiler 1	On 6/15/2020: One (1) hour of downtime due to performing CEMS CGA.
Boiler 2	On 6/15/2020: One (1) hour of downtime due to performing CEMS CGA.
CO	
Boiler 1	On 6/15/2020: One (1) hour of downtime due to performing CEMS CGA.
Boiler 2	On 6/15/2020: One (1) hour of downtime due to performing CEMS CGA.
CO₂	
Boiler 1	On 6/15/2020: One (1) hour of downtime due to performing CEMS CGA.
Boiler 2	On 6/15/2020: One (1) hour of downtime due to performing CEMS CGA.
O₂	
Boiler 1	On 6/15/2020: One (1) hour of downtime due to performing CEMS CGA.
Boiler 2	On 6/15/2020: One (1) hour of downtime due to performing CEMS CGA.
OPACITY	
Boiler 1	On 6/15/20: Twelve (12) six-minute periods (72-minutes) of downtime due performing CGA.
Boiler 1	On 6/25/20: Two (2) six-minute periods (12-minutes) of downtime due to performing Opacity Audit.

CEMS/COMS DOWNTIME PERIODS	
Boiler 2	On 6/15/20: Fourteen (14) six-minute periods (84-minutes) of downtime due performing CGA.
Boiler 2	On 6/25/20: Three (3) six-minute periods (12-minutes) of downtime due to performing Opacity Audit.

OPERATING DATA	
Ammonia Usage (Pounds)	
Boiler 1	31,306
Boiler 2	67,154
Total Both Boilers	98,460
Boiler Operating Time (Hours)	
Boiler 1	636
Boiler 2	715

BOILER OFF LINE TIMES				
Boiler 1				
Boiler Off line		Boiler On line		Cause
Date	Time off	Date	Time on	
6/08/20	02:05	6/10/20	10:12	Offline due to plant trip from PLC alarm
6/17/20	14:53	6/18/20	13:57	Offline for unscheduled maintenance to address TR-1A issue
6/21/20	05:50	6/21/20	11:32	Offline due to PG&E curtailment
Boiler 2				
Boiler Off line		Boiler On line		Cause
Date	Time off	Date	Time on	
6/8/20	02:05	6/8/20	03:33	Offline due to plant trip from PLC alarm
6/21/20	05:50	6/21/20	10:09	Offline due to PG&E curtailment

Note: Boiler Off Line Times are in DAHS time

CAM Plan Excursions	
Date	Description
6/17/2020	On June 17, 2020, Boiler #1 ESP transformer TR-1A 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 notified. In order to repair the warped plate, which had caused the short in Boiler #1 ESP, the boiler was shut down on June 17th.



August 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 – July 2020**
Burney Forest Products

Dear Ms. Welch,

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

A handwritten signature in black ink, appearing to read "Bill Dillard", is written over the printed name and title.

Cc: John Christian (email)

File: 201-40-03

BURNEY FOREST PRODUCTS
Monthly Emissions Report
July 2020

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

CEMS/COMS DOWNTIME PERIODS	
NO_x	
Boiler 1	On 7/20/2020: One (1) hour of downtime for CEMS maintenance.
Boiler 2	None
CO	
Boiler 1	On 7/20/2020: One (1) hour of downtime for CEMS maintenance.
Boiler 2	None
CO₂	
Boiler 1	On 7/20/2020: One (1) hour of downtime for CEMS maintenance.
Boiler 2	None
O₂	
Boiler 1	On 7/20/2020: One (1) hour of downtime for CEMS maintenance.
Boiler 2	None
OPACITY	
Boiler 1	None
Boiler 2	On 7/8/2020: One (1) six-minute period downtime due to issues communicating with CEMS PLC.

OPERATING DATA	
Ammonia Usage (Pounds)	
Boiler 1	33,566
Boiler 2	55,672
Total Both Boilers	89,238
Boiler Operating Time (Hours)	
Boiler 1	684
Boiler 2	688

BOILER OFF LINE TIMES				
Boiler 1				
Boiler Off line		Boiler On line		Cause
Date	Time off	Date	Time on	
7/07/20	06:02	7/07/20	14:06	Offline due to issues with fuel feed system
7/15/20	04:27	7/15/20	13:31	Offline due to PG&E requested line outage
7/29/20	22:38	7/31/20	14:50	Offline due to unscheduled/unplanned maintenance to address a suspected condenser tube leak
Boiler 2				
Boiler Off line		Boiler On line		Cause
Date	Time off	Date	Time on	
7/15/20	04:27	7/15/20	14:30	Offline due to PG&E requested line outage
7/29/20	21:45	7/31/20	15:52	Offline due to unscheduled/unplanned maintenance to address a suspected condenser tube leak

Note: Boiler Off Line Times are in DAHS time

CAM Plan Excursions	
Date	Description
	None



September 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 – August 2020**
Burney Forest Products

Dear Ms. Welch,

Pursuant to Title V Operating Permit 87-TV-27n, Condition 20, enclosed please find the August 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 dark ink, appearing to read 'Bill Dillard', with a long, sweeping horizontal line extending to the right.

Bill Dillard
Plant Manager

Cc: John Christian (email)

File: 201-40-03

BURNEY FOREST PRODUCTS
Monthly Emissions Report
August 2020

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

CEMS/COMS DOWNTIME PERIODS	
NO_x	
Boiler 1	On 8/20/2020: One (1) hour of downtime for CEMS maintenance.
Boiler 2	None
CO	
Boiler 1	On 8/20/2020: One (1) hour of downtime for CEMS maintenance.
Boiler 2	None
CO₂	
Boiler 1	On 8/20/2020: One (1) hour of downtime for CEMS maintenance.
Boiler 2	None
O₂	
Boiler 1	On 8/20/2020: One (1) hour of downtime for CEMS maintenance.
Boiler 2	None
OPACITY	
Boiler 1	On 8/20/2020: Five (5) six-minute periods downtime for CEMS maintenance.
Boiler 2	On 8/27/2020: Eight (8) six-minute periods downtime for CEMS maintenance.

OPERATING DATA	
Ammonia Usage (Pounds)	
Boiler 1	54,559
Boiler 2	84,206
Total Both Boilers	138,765
Boiler Operating Time (Hours)	
Boiler 1	676
Boiler 2	729

BOILER OFF LINE TIMES				
Boiler 1				
Boiler Off line		Boiler On line		Cause
Date	Time off	Date	Time on	
8/21/20	14:54	8/23/20	13:22	Offline to perform unscheduled maintenance for Boiler refractory repair
Boiler 2				
Boiler Off line		Boiler On line		Cause
Date	Time off	Date	Time on	
8/30/20	04:34	8/30/20	16:58	Offline due to PG&E requested line outage

Note: Boiler Off Line Times are in DAHS time

CAM Plan Excursions	
Date	Description
	None



October 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 – September 2020**
Burney Forest Products

Dear Ms. Welch,

Pursuant to Title V Operating Permit 87-TV-27n, Condition 20, enclosed please find the September 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 "B. Dillard", is written over a horizontal line.

Bill Dillard
Plant Manager

Cc: John Christian (email)

File: 201-40-03

BURNEY FOREST PRODUCTS
Monthly Emissions Report
September 2020

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

CEMS/COMS DOWNTIME PERIODS	
NO_x	
Boiler 1	None
Boiler 2	None
CO	
Boiler 1	None
Boiler 2	None
CO₂	
Boiler 1	None
Boiler 2	None
O₂	
Boiler 1	None
Boiler 2	None
OPACITY	
Boiler 1	On 9/22/2020: 48 six-minute periods downtime for COMS off-stack calibration.
Boiler 2	On 9/23/2020: 38 six-minute periods downtime for COMS off-stack calibration.

OPERATING DATA	
Ammonia Usage (Pounds)	
Boiler 1	63,491
Boiler 2	86,571
Total Both Boilers	150,062
Boiler Operating Time (Hours)	
Boiler 1	654
Boiler 2	671

BOILER OFF LINE TIMES				
Boiler 1				
Boiler Off line		Boiler On line		Cause
Date	Time off	Date	Time on	
9/7/20	18:35	9/9/20	14:26	Offline due to PG&E public safety shut off
9/13/20	08:31	9/14/20	02:09	Offline due to PG&E requested line outage
Boiler 2				
Boiler Off line		Boiler On line		Cause
Date	Time off	Date	Time on	
9/7/20	18:36	9/9/20	15:51	Offline due to PG&E public safety shut off
9/13/20	14:15	9/13/20	19:20	Offline due to PG&E requested line outage

Note: Boiler Off Line Times are in DAHS time

CAM Plan Excursions	
Date	Description
	None



November 20, 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 – October 2020**
Burney Forest Products

Dear Ms. Welch,

Pursuant to Title V Operating Permit 87-TV-27n, Condition 20, enclosed please find the October 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', is positioned below the word 'Sincerely,'.

Bill Dillard
Plant Manager

Cc: John Christian (email)

File: 201-40-03

BURNEY FOREST PRODUCTS
Monthly Emissions Report
October 2020

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

CEMS/COMS DOWNTIME PERIODS	
NO_x	
Boiler 1	On 10/22/2020: One (1) hour downtime for CEMS Maintenance.
Boiler 2	None
CO	
Boiler 1	On 10/22/2020: One (1) hour downtime for CEMS Maintenance.
Boiler 2	None
CO₂	
Boiler 1	On 10/22/2020: One (1) hour downtime for CEMS Maintenance.
Boiler 2	On 10/22/2020: One (1) hour downtime for CEMS Maintenance.
O₂	
Boiler 1	On 10/22/2020: One (1) hour downtime for CEMS Maintenance.
Boiler 2	None
OPACITY	
Boiler 1	None
Boiler 2	On 10/22/2020: Two (2) 6-min periods downtime for Maintenance.

OPERATING DATA	
Ammonia Usage (Pounds)	
Boiler 1	34,735
Boiler 2	41,638
Total Both Boilers	76,373
Boiler Operating Time (Hours)	
Boiler 1	640
Boiler 2	618

BOILER OFF LINE TIMES				
Boiler 1				
Boiler Off line		Boiler On line		Cause
Date	Time off	Date	Time on	
10/4/20	06:40	10/9/20	5:12	Offline for Maintenance Outage
Boiler 2				
Boiler Off line		Boiler On line		Cause
Date	Time off	Date	Time on	
10/4/20	06:41	10/9/20	19:09	Offline for Maintenance Outage

Note: Boiler Off Line Times are in DAHS time

CAM Plan Excursions	
Date	Description
	None

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

AT&T
Albion Power Company

Alta Power Group, LLC
Anderson & Poole

Atlas ReFuel
BART

Barkovich & Yap, Inc.
California Cotton Ginners & Growers Assn
California Energy Commission

California Hub for Energy Efficiency
Financing

California Alternative Energy and
Advanced Transportation Financing
Authority
California Public Utilities Commission
Calpine

Cameron-Daniel, P.C.
Casner, Steve
Cenergy Power
Center for Biological Diversity

Chevron Pipeline and Power
City of Palo Alto

City of San Jose
Clean Power Research
Coast Economic Consulting
Commercial Energy
Crossborder Energy
Crown Road Energy, LLC
Davis Wright Tremaine LLP
Day Carter Murphy

Dept of General Services
Don Pickett & Associates, Inc.
Douglass & Liddell

East Bay Community Energy Ellison
Schneider & Harris LLP Energy
Management Service
Engineers and Scientists of California

GenOn Energy, Inc.
Goodin, MacBride, Squeri, Schlotz &
Ritchie
Green Power Institute
Hanna & Morton
ICF
IGS Energy
International Power Technology
Intestate Gas Services, Inc.
Kelly Group
Ken Bohn Consulting
Keyes & Fox LLP
Leviton Manufacturing Co., Inc.

Los Angeles County Integrated
Waste Management Task Force
MRW & Associates
Manatt Phelps Phillips
Marin Energy Authority
McKenzie & Associates

Modesto Irrigation District
NLine Energy, Inc.
NRG Solar

Office of Ratepayer Advocates
OnGrid Solar
Pacific Gas and Electric Company
Peninsula Clean Energy

Pioneer Community Energy

Redwood Coast Energy Authority
Regulatory & Cogeneration Service, Inc.
SCD Energy Solutions
San Diego Gas & Electric Company

SPURR
San Francisco Water Power and Sewer
Semptra Utilities

Sierra Telephone Company, Inc.
Southern California Edison Company
Southern California Gas Company
Spark Energy
Sun Light & Power
Sunshine Design
Tecogen, Inc.
TerraVerde Renewable Partners
Tiger Natural Gas, Inc.

TransCanada
Utility Cost Management
Utility Power Solutions
Water and Energy Consulting Wellhead
Electric Company
Western Manufactured Housing
Communities Association (WMA)
Yep Energy