

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6966E
As of July 24, 2023

Subject: Information-Only Advice Letter Regarding Air Pollution Control Information on Tree Mortality Contracts

Division Assigned: Energy

Date Filed: 06-20-2023

Date to Calendar: 06-23-2023

Authorizing Documents: D1812003

Disposition:	Accepted
Effective Date:	06-20-2023

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Kimberly Loo

(279)789-6209

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

June 20, 2023

Advice 6966-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 (Decision), issued on December 21, 2018, Pacific Gas and Electric Company (PG&E) respectfully submits this information-only advice letter providing data on each of PG&E's three 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. 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, E-4805 and E-4977.

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 in each of the attachments listed below.

Shasta – Sustainable Resource Management Inc. (Shasta)

The facility has confirmed compliance with the applicable air pollution and control requirements for the reporting period of December 2, 2022 to May 31, 2023 with the exception of the items described in the facility attestation provided as Attachment 1 to this Advice Letter, which explains the circumstances of the non-compliance, the steps taken by Shasta to rectify the non-compliance, and the resolution of the non-compliance. The facility's annual certification report is also provided as Attachment 2 to this Advice Letter to support the facility attestation and facility's compliance with its applicable air pollution requirements. Please refer to the Deviation Reports (Form 5-L) located in Attachment 2 for further detail on the non-compliance item.

Burney Forest Products

The facility has confirmed compliance with the applicable air pollution and control requirements for the reporting period of November 1, 2022 to April 30, 2023 as reflected in the facility attestation provided as Attachment 3 to this Advice Letter. The facility reported no deviations or non-compliance events during this reporting period. The facility's semi-annual certification report is also provided as Attachment 4 to this Advice Letter to support the facility attestation and facility's compliance with its applicable air pollution requirements.

Woodland Biomass

The facility has confirmed compliance with the applicable air pollution and control requirements for the reporting period of December 1, 2022 to May 31, 2023 with the exception of the items described in the facility attestation provided as Attachment 5 to this Advice Letter, which explains the circumstances of the non-compliance, the steps taken by Shasta to rectify the non-compliance, and the resolution of the non-compliance. The facility's annual and semi-annual certifications are also provided as Attachment 6 to this Advice Letter to support the facility attestation and facility's compliance with its applicable air pollution requirements. Please refer to the Deviation Reports (Form 3.8-L) located in Attachment 6 for further detail on the non-compliance items.

Additionally, the three 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: Shasta – Sustainable Resource Management, Inc. Air Quality Attestation

Attachment 2: Shasta – Sustainable Resource Management, Inc. Certification and Deviation Report

Attachment 3: Burney Forest Products Air Quality Attestation

Attachment 4: Burney Forest Products Certification Report

Attachment 5: Woodland Biomass Air Quality Attestation

Attachment 6: Woodland Biomass Certification and Deviation Reports

Protests

This is an information-only advice letter submittal.² 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 June 20, 2023.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically 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/>.

/S/

Sidney Bob Dietz II
Director, Regulatory Relations
CPUC Communications

Attachments

cc: Service List A.16-11-005

² See D.18-12-003 (OP 6) (specifying that the Advice Letter shall be information-only).



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

Company name/CPUC Utility No.: Pacific Gas and Electric Company (ID U39 E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Kimberly Loo

Phone #: (279)789-6209

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) #: 6966-E

Tier Designation: Information-Only

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

Keywords (choose from CPUC listing): Compliance, Contracts

AL Type: Monthly Quarterly Annual One-Time Other:

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

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

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

Confidential treatment requested? Yes No

If yes, specification of confidential information:

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

Resolution required? Yes No

Requested effective date: 6/20/23

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

California Public Utilities Commission
Energy Division Tariff Unit Email:
EDTariffUnit@cpuc.ca.gov

Contact Name: Sidnev Bob Dietz II. c/o Megan Lawson
Title: Director, Regulatory Relations
Utility/Entity Name: Pacific Gas and Electric Company

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email: PGETariffs@pge.com

Contact Name:
Title:
Utility/Entity Name:

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

CPUC
Energy Division Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

Clear Form

PACIFIC GAS AND ELECTRIC COMPANY

ATTACHMENT 1

Shasta – Sustainable Resource Management Inc

Air Quality Attestation



Shasta-Sustainable Resource Management, Inc.
20811 Industry Rd.
Anderson, CA 96007
(530) 339-7600

**APPENDIX C
AIR QUALITY ATTESTATION**

[VIA ELECTRONIC SUBMISSION]

June 2, 2023

PG&E

***Attn: Energy Contract Management and Settlements
77 Beale Street, Mail Code N12E
San Francisco, CA 94105, 94105-1702***

Subject: Bioenergy Renewable Auction Mechanism Power Purchase Agreement (“BioRAM PPA”) by and between PG&E (“Buyer”) and ***Shasta - Sustainable Resource Management Inc, a Delaware corporation*** (“Seller”) – Seller’s Air Quality Attestation

Dear Sir or Madam:

Pursuant to Section 3.11 of the BioRAM PPA, Seller attests that the Project ***was not*** in compliance with all applicable air pollution and control requirements for the period beginning ***December 2, 2022*** and ending ***May 31, 2023***. 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 not*** in compliance with all applicable air pollution and control requirements for the period.
3. List of non-compliance:
Deviations to Title V permit conditions occurred during the reporting period as detailed in the attached Deviation Report Forms.
Condition 3 of the permit requires that the 6-minute average stack opacity not exceed 20%. On 3/14/23 starting at 01:12 AM there were two 6-minute opacity averages on boiler 2 greater than 20%. This was the result of a combustion upset that tripped off an ESP field and in excess opacity. Corrective actions were taken immediately to adjust the boiler combustion conditions and restart the ESP field.
Condition 5e of the permit requires that the CO average for all 3 boilers over three hours does not exceed 1696 ppmv, corrected to 3% O2. Due to wet fuel and an inoperable grate drive, there was poor combustion in boiler 2 from 1800 through 2059 on December 31st, 2022, resulting in a 2-boiler, 3-hour average of 1732 ppmv, corrected



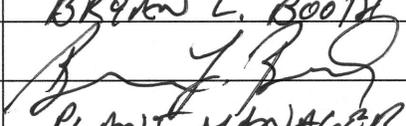
Shasta-Sustainable Resource Management, Inc.
20811 Industry Rd.
Anderson, CA 96007
(530) 339-7600

to 3% O₂. Combustion was adjusted, load was lowered, and gas guns were lit to combat the high emissions.

Condition 52 of the permit limits the fuel pile height to 50 feet. The pile survey on 3/31/23 found the height was 51.5 foot. Upon receipt of the results the pile height was lowered, and a follow-up survey was conducted to confirm compliance.

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	SHASTA - SRM
Print Name	BRYAN L. BOOTH
Signature	
Title	PLANT MANAGER
Date	6/2/23

Attachment:

Certification Report for the period beginning December 2, 2022 and ending May 31, 2023

PACIFIC GAS AND ELECTRIC COMPANY

ATTACHMENT 2

Shasta – Sustainable Resource Management Inc

Certification and Deviation Reports

Facility Name: Shasta – Sustainable Resource Management
Reporting Period: December 2, 2022 to May 31, 2023
Facility Permit Number: 86-TV-08j

Report Due Date: June 2023
Submittal: 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: Shasta – Sustainable Resource Management
Facility Name: Shasta – Sustainable Resource Management
Nature of Business: Power Generation

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

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

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

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

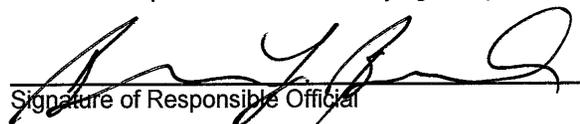
3. CERTIFICATION

Statement of Certification:

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

BRYAN L. BOOTH
Name of Responsible Official Certifying Compliance

PLANT MANAGER
Title of Responsible Official and Company Name


Signature of Responsible Official

6/2/23
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: Shasta – Sustainable Resource Management
 Reporting Period: December 2, 2022 to May 31, 2023
 Facility Permit: 86-TV-08j

Report Due Date:
 Submittal Type:

June 2023

<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	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	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	Yes X No	X Yes No	Yes X No	Yes X 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	Yes X No	Yes X No	Yes X No	Yes X 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	Yes X No	Yes X No	X Yes 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	Yes X No	Yes X No	X Yes 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	Yes X No	Yes X No	X Yes 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	Yes X No	Yes X No	X Yes 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	X Yes No	Yes X No	Yes X No	Yes X No	X Yes No	X Yes No	

Facility Name: Shasta – Sustainable Resource Management
 Reporting Period: December 2, 2022 to May 31, 2023
 Facility Permit: 86-TV-08j

Report Due Date:
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June 2023

- 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 6 (District-only requirement)	Fugitive Emissions Control - Maintain dust control systems, high wind speed actions, ash handling, housekeeping and work practices.	X Yes No	Continuous	X Intermittent	Yes	X No	Yes	X No	Yes	X No	Yes	X No	Yes	X No
86-VP-08h 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	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	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	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	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	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	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	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	Yes	X No

Facility Name: Shasta – Sustainable Resource Management
 Reporting Period: December 2, 2022 to May 31, 2023
 Facility Permit: 86-TV-08j

Report Due Date:
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June 2023

- 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 15	Air Pollution Control Equipment - Maintain facility such that the Air Pollution Control equipment is in service while combustion process is occurring.	X Yes No	X Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X 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.	X Yes No	X Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X 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).	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 19	Steam Limits - Maintain the DAS and fuel use database.	X Yes No	X Continuous Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 20	Water Treatment Chemicals – Ensure no chrome-based water treatment chemicals are used.	X Yes No	X Continuous Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X 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.	X Yes No	X Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 21g	Sulfur in Fuels - monitor if use new fuels	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X 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.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X 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.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	

Facility Name: Shasta – Sustainable Resource Management
 Reporting Period: December 2, 2022 to May 31, 2023
 Facility Permit: 86-TV-08j

Report Due Date:
 Submittal Type:

June 2023

<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.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	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.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	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.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 27	Source Test – Use independent vendor; Comply with approved test method procedures.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 28	Source Tests - Perform source tests at the required frequency. Submit test reports to AQMD as required.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 29	Excess Emissions - Maintain a log of APCO notifications, Report within 4 hours	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 30	Permit Deviations - Maintain a log of APCO notifications.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 31	Semi-Annual Compliance Reports - Submit the semi-annual compliance certification to the District by the required date.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 32	Annual Compliance Reports - Submit annual certification to the District and U.S. EPA.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No

Facility Name: Shasta – Sustainable Resource Management
 Reporting Period: December 2, 2022 to May 31, 2023
 Facility Permit: 86-TV-08j

Report Due Date:
 Submittal Type:

June 2023

<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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86-VP-08h and 86-TV-08i Condition 33	Emission Limit Demonstration – Verify compliance with standard limits upon request. No request was made.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 34	Visible Emission Observations - Use opacity monitor for compliance with visible emissions limits.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 35	Monitoring and Support Records - Maintain records of maintenance and operation. Maintain CEMS data records.	X	Yes	No	X	Continuous	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 36	Emission Increases – Notify AQMD of changes that increase emissions.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
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.....	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	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.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 39	Testing Facilities - Maintain a safe stack sampling location.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
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.	X	Yes	No	X	Continuous	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 41	Good Operating Practices – Operate and maintain equipment to minimize emissions.	X	Yes	No	X	Continuous	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No

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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.	X	Yes	No	X	Continuous	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No	
86-VP-08h and 86-TV-08i Condition 43	CEMs Data – Maintain CEMs operational and log of AQMD notifications.	X	Yes	No	X	Continuous	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No	
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.	X	Yes	No		Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 45	Risk Management Plan - Maintain Risk Management Plan.	X	Yes	No		Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	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.	X	Yes	No	X	Continuous	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No	
86-VP-08h and 86-TV-08i Condition 47	ESP Power - Maintain ESP power monitoring system.	X	Yes	No	X	Continuous	Intermittent	Yes	X	No	Yes	X	No	Yes	X	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.	X	Yes	No		Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	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.	X	Yes	No		Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 50	Semi-Annual NSPS Summary Report - Submit semi-annual summary report.	X	Yes	No		Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No

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86-VP-08h and 86-TV-08i Condition 51 (District-only requirement)	Fuel Pile Camera & Observations - Use camera to observe fuel piles. Report outages longer than 6 hours.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 52 (District-only requirement)	Fuel Pile Dimensions – Conduct quarterly fuel pile surveys.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	X	Yes	No	Yes	X	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.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	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.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 56	Title V Conditions – Comply with all conditions of the permit	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	X	Yes	No
86-VP-08h and 86-TV-08i Condition 62	Information Requests – Supply information to AQMD upon request.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 63	Construction – Obtain authorization as needed for new equipment or changes to emissions sources.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 64	Operating Permit – Obtain permits as needed for new equipment or changes to emissions sources.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 66	Permit – Maintain permits in good condition.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No

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86-VP-08h and 86-TV-08i Condition 67	Permit Posting – Maintain posted permits in good condition.	<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 73	Inspections – Permit entry of authorized agency personnel.	<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 75	Permit Renewal – Submit administratively complete permit renewal application within required timeframe.	<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 76	Fees – Submit annual fees	<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 77	Ozone Depleting Substances – Hire only certified technicians for ODS work.	<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 78	Ozone Depleting Substances – Hire only certified technicians for ODS work.	<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 79	Ozone Depleting Substances – Hire only certified technicians for ODS work.	<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 80	Circumvention – Maintain operations so as to not circumvent emission limits.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> 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	<input type="checkbox"/> 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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86-VP-08h and 86-TV-08i Condition 84	Equipment Design – Design all equipment to minimize emissions and maintain compliance.	X Yes No	Continuous	X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 86	Training – Provide training for operating staff.	X Yes No	Continuous	X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 87	New Source Performance Standards – Comply with NSPS standards.	X Yes No	Continuous	X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X 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.	X Yes No	Continuous	X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 90	Subpart ZZZZ Diesel Engine Records – Maintain maintenance records and records of hours of operation.	X Yes No	Continuous	X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X 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.	X Yes No	Continuous	X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 93	Energy Assessment – Perform the Energy Assessment. Submit upon request.	X Yes No	Continuous	X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X 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.	X Yes No	Continuous	X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X 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.	X Yes No	X Continuous	Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	

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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.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	X	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.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	X	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.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	X	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.	X	Yes	No	X	Continuous	Intermittent	Yes	X	No	Yes	X	No	Yes	X	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.	X	Yes	No	X	Continuous	Intermittent	Yes	X	No	Yes	X	No	X	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.	X	Yes	No	X	Continuous	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 102	Subpart DDDDD Good Operating Practices – Operate and maintain equipment to minimize emissions.	X	Yes	No	X	Continuous	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
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.	X	Yes	No	Continuous	X	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No
86-VP-08h and 86-TV-08i Condition 104	Subpart DDDDD Affirmative Defense – May be made for malfunctions as per requirements	X	Yes	No	X	Continuous	Intermittent	Yes	X	No	Yes	X	No	Yes	X	No

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86-VP-08h and 86-TV-08i Condition 105	Subpart DDDDD Data Collection – Collect data in accordance with Table 8 of Subpart DDDDD.	X Yes No	X Continuous Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X 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.	X Yes No	X Continuous Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X 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.	X Yes No	X Continuous Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 108	Subpart DDDDD Initial Performance Test – Perform the initial testing.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	
86-VP-08h and 86-TV-08i Condition 109	Initial Performance Testing Alternative: Fuel Sampling & Analysis – This option was not used.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X 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.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X 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.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X 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.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	X Yes No	No	
86-VP-08h and 86-TV-08i Condition 113	Periodic Performance Testing Alternative: Fuel Sampling & Analysis – This option is not used.	X Yes No	Continuous X Intermittent	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	Yes X No	

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

List of Conditions Not Requiring Certification (Informational Only)	
Title V Condition No.	December 2, 2022 to May 31, 2023
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

2023 Title V Certification – Deviations and Test Data

DEVIATION REPORT (FORM 5-L)

SHASTA COUNTY AIR QUALITY MANAGEMENT DISTRICT

DEVIATION INFORMATION

- 1. Permit numbers(s) and condition(s) of emission unit or control unit affected:**
86-TV-08j – Condition 3
- 2. Description of deviation and methods used to determine compliance status:**
As previously reported, there were two 6-minute opacity blocks of 57% and 27% on 3/14/23 on boiler #2
- 3. Description and identification of permit condition(s) deviated:**
Condition 3 requires maintaining 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
- 5. Date and time when deviation was discovered:**
On 3/14/23 at 01:17
- 6. Date, time and duration of deviation:**
From 01:12 to 10:23 on 3/14/23
- 7. Probable cause of deviation:**
High boiler CO and low O2 from a combustion upset resulted in excess emissions.
- 8. Preventative or corrective action taken:**
Corrective actions were taken immediately to adjust the boiler combustion conditions and restart the ESP field.

2023 Title V Certification – Deviations and Test Data

DEVIATION REPORT (FORM 5-L)

SHASTA COUNTY AIR QUALITY MANAGEMENT DISTRICT

DEVIATION INFORMATION

- 1. Permit numbers(s) and condition(s) of emission unit or control unit affected:**
86-TV-08j – Condition 5e
- 2. Description of deviation and methods used to determine compliance status:**
As previously reported, the 3-boiler, 3-hour CO average was 1732 ppmv dry basis at 3% O₂ on 12/31/22 for the 3-hour block starting at 18:00 hours.
- 3. Description and identification of permit condition(s) deviated:**
CO emission limits for 3-boiler, 3-hour average of 1696 ppmv dry basis at 3% O₂ as listed in Condition 5e.
- 4. Associated equipment and equipment operation (if any):**
All 3 boilers
- 5. Date and time when deviation was discovered:**
12/31/22 at 21:00 on 12/31/22
- 6. Date, time, and duration of deviation:**
18:00 to 20:59 on 12/31/22
- 7. Probable cause of deviation:**
High boiler CO and high O₂ was caused by very wet fuel and an inoperable grate drive on boiler 2. The wet fuel resulted in very poor combustion conditions in all three boilers resulting in fuel piling up in the boilers. The gas guns on the boilers were lit to aid in combustion and load was lowered. However, the inoperable grate drive on boiler 2 also contributed to the poor combustion which resulted in excess emissions.
- 8. Preventative or corrective action taken:**
Corrective actions were taken that included to lower load, light the gas guns and adjust the boiler combustion conditions to combat high CO levels. The corrective actions were not sufficient to prevent the CO exceedance.
Review grooming procedures during winter months and provide improved training to plant operator for responding to poor combustion conditions.

2023 Title V Certification – Deviations and Test Data

DEVIATION REPORT (FORM 5-L)

SHASTA COUNTY AIR QUALITY MANAGEMENT DISTRICT

DEVIATION INFORMATION

- 1. Permit numbers(s) and condition(s) of emission unit or control unit affected:**
86-TV-08j – Condition 52
- 2. Description of deviation and methods used to determine compliance status:**
As previously reported, the fuel pile survey on Friday March 31st showed a maximum height of 51.5 foot.
- 3. Description and identification of permit condition(s) deviated:**
Condition 52 requires that the fuel pile shall not exceed the maximum height as specified in the Use Permit, which is listed as 50 foot.
- 4. Associated equipment and equipment operation (if any):**
East and West Fuel Piles.
- 5. Date and time when deviation was discovered:**
Saturday, April 1 at 8:45 PM.
- 6. Date, time and duration of deviation:**
The ridge at the top of the west pile was reshaped on Monday to lower the height. A new survey was conducted and the maximum height after the corrective action was found to be 46 foot.
- 7. Probable cause of deviation:**
The fuel pile was pushed in too high.
- 8. Preventative or corrective action taken:**
The ridge at the top of the pile was reshaped to lower the pile and a new survey was conducted. The maximum height afterwards was found to be 46 foot.
The surveyor has been instructed to inform us immediately upon discovery of an over height measurement.

2023 Title V Certification – Deviations and Test Data

DEVIATION REPORT (FORM 5-L)

SHASTA COUNTY AIR QUALITY MANAGEMENT DISTRICT

DEVIATION INFORMATION

- 1. Permit numbers(s) and condition(s) of emission unit or control unit affected:**
86-TV-08j – 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.

2023 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	880	1696 Three boiler average	EPA Method 10	5/23/22
Carbon Monoxide - CO	lbs/hr	211	793 Total all three boilers	EPA Method 10	5/23/22
Ammonia - NH ₃	ppm @ 3% O ₂	19.3	28	SCAQMD 207.1 Modified	5/23/22
Oxides of Sulfur - SO ₂	ppm @ 3% O ₂	0.1	24	EPA Method 6C	5/23/22
Oxides of Sulfur - SO ₂	lbs/hr	0.05	45 Total all three boilers	EPA Method 6C	5/23/22
Filterable Particulate	gr/dscf @ 3% O ₂	0.00102	0.014	CARB Method 5	5/23/22
Total Particulate	lbs/hr	1.51	20	CARB Method 5	5/23/22
Nonmethane Hydrocarbons	ppm @ 3% O ₂	33.7	191	EPA Method 25A & EPA Method 18	5/23/22
Nonmethane Hydrocarbons	lbs/hr	3.47	89 Total all three boilers	EPA Method 25A & EPA Method 18	5/23/22
Mercury – Hg*	lbs/MMBtu	<1.21 E-6	5.76 E-6	EPA Method 29	6/21/21 and 6/22/21
Hydrochloric Acid – HCl*	lbs/MMBtu	0.00017	0.022	EPA Method 26A	6/21/21 and 6/22/21
Filterable Particulate*	lbs/MMBtu	0.0015	0.037	CARB Method 5	6/21/21 and 6/22/21

*As per Condition 112 of the permit, testing results are less than 75% of the limit

2023 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	796	1696 Three boiler average	EPA Method 10	5/24/22
Carbon Monoxide - CO	lbs/hr	200	793 Total all three boilers	EPA Method 10	5/24/22
Ammonia - NH ₃	ppm @ 3% O ₂	18.2	28	SCAQMD 207.1 Modified	5/24/22
Oxides of Sulfur - SO ₂	ppm @ 3% O ₂	0.16	24	EPA Method 6C	5/24/22
Oxides of Sulfur - SO ₂	lbs/hr	0.09	45 Total all three boilers	EPA Method 6C	5/24/22
Filterable Particulate	gr/dscf @ 3% O ₂	0.0030	0.014	CARB Method 5	5/24/22
Total Particulate	lbs/hr	2.28	20	CARB Method 5	5/24/22
Nonmethane Hydrocarbons	ppm @ 3% O ₂	11.2	191	EPA Method 25A & EPA Method 18	5/24/22
Nonmethane Hydrocarbons	lbs/hr	1.21	89 Total all three boilers	EPA Method 25A & EPA Method 18	5/24/22
Mercury – Hg*	lbs/MMBtu	<1.30 E-6	5.76 E-6	EPA Method 29	6/23/21
Hydrochloric Acid – HCl*	lbs/MMBtu	0.00019	0.022	EPA Method 26A	6/23/21
Filterable Particulate*	lbs/MMBtu	0.0023	0.037	CARB Method 5	6/23/21 and 6/24/21

*As per Condition 112 of the permit, testing results are less than 75% of the limit

2023 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	503	1696 Three boiler average	EPA Method 10	5/25/22
Carbon Monoxide - CO	lbs/hr	120	793 Total all three boilers	EPA Method 10	5/25/22
Ammonia - NH ₃	ppm @ 3% O ₂	20.1	28	SCAQMD 207.1 Modified	5/25/22
Oxides of Sulfur - SO ₂	ppm @ 3% O ₂	0.2	24	EPA Method 6C	5/25/22
Oxides of Sulfur - SO ₂	lbs/hr	0.09	45 Total all three boilers	EPA Method 6C	5/25/22
Filterable Particulate	gr/dscf @ 3% O ₂	0.00175	0.014	CARB Method 5	5/25/22
Total Particulate	lbs/hr	1.48	20	CARB Method 5	5/25/22
Nonmethane Hydrocarbons	ppm @ 3% O ₂	13.0	191	EPA Method 25A & EPA Method 18	5/25/22
Nonmethane Hydrocarbons	lbs/hr	1.33	89 Total all three boilers	EPA Method 25A & EPA Method 18	5/25/22
Mercury – Hg*	lbs/MMBtu	<1.34 E-6	5.76 E-6	EPA Method 29	6/21/21 and 6/22/21
Hydrochloric Acid – HCl*	lbs/MMBtu	0.0002	0.022	EPA Method 26A	6/21/21 and 6/22/21
Filterable Particulate*	lbs/MMBtu	0.0029	0.037	CARB Method 5	6/21/21 and 6/22/21

*As per Condition 112 of the permit, testing results are less than 75% of the limit

PACIFIC GAS AND ELECTRIC COMPANY

ATTACHMENT 3

Burney Forest Products Air Quality Attestation

**APPENDIX C
AIR QUALITY ATTESTATION**

[VIA ELECTRONIC SUBMISSION]



May 25, 2023

PG&E

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

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

Dear Sir or Madam:

Seller attests that the Project is in compliance with all applicable air pollution and control requirements for the period beginning November 1, 2022 and ending April 30, 2023. Seller hereby represents and warrants that:

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

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

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

PACIFIC GAS AND ELECTRIC COMPANY

ATTACHMENT 4

Burney Forest Products Certification Report



May 18, 2023

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

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

Dear Ms. Welch,

In accordance with Conditions 23 of the referenced permit, enclosed please find Burney Forest Product's completed Semi-Annual Monitoring Report. This submittal covers the time period from October 14, 2022 through April 13, 2023 reporting period.

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

Sincerely,

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

Bill Dillard,
Plant Manager, Burney Forest Products

Enclosures

cc: Dave McEligot, Olympus Power (email)

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, 2022 through April 13, 2023
2. Due date for submittal of report: May 28, 2023
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)

Seller	Burney Forest Products
Print Name	Billy Dillard
Signature	
Title	Plant Manager
Date	May 25, 2023

PACIFIC GAS AND ELECTRIC COMPANY

ATTACHMENT 5

Woodland Biomass Air Quality Attestation

Woodland Biomass Power, LLC

June 6, 2023

Via Electronic Submission

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

Subject: Bioenergy Renewable Auction Mechanism Power Purchase Agreement (“RAM PPA”) by and between PG&E (“Buyer”) and Woodland Biomass Power, LLC., a California limited liability company (“Seller”), dated September 20, 2021 – Seller’s Air Quality Attestation

Dear Sir or Madam:

Pursuant to Section 3.11 of the RAM PPA, Seller attests that the Project is not in compliance with all applicable air pollution and control requirements for the period beginning December 1, 2022 and ending May 31, 2023. 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 not in compliance with all applicable air pollution control requirements for the period.
3. List of non-compliances:

The facility failed the annual PM10 source test, conducted on December 16, 2022. The draft results were received on February 1, 2023. After a review of plant operating parameters and testing methods was completed, a retest was completed on March 7, 2023. The Facility was back into compliance on March 7, 2023 after a successful, passing PM10 test.

A deviation report was submitted for notifying the Air District of the PM10 retest, less than the 15 day testing notification requirement. The retest was scheduled as soon as possible to minimize the number of days the facility was out of compliance with the source test. Facility personnel were in constant communication with the Air District. The Air District was aware of the shortened testing period. The facility was back into compliance on March 7, 2023 once testing was completed.

Deviation reports were also submitted regarding Q4 2022 and 2022 Annual PM10 tons being exceeded as a result of the failed annual source test. The higher than expected PM10 total value was input into the facility totals once received on

February 1, 2023, causing the quarterly and annual totals to be exceeded. The facility was back into compliance March 1, 2023 for the quarterly limit and January 1, 2023 for the annual limit.

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 RAM PPA. Authorized signature from the Seller certifies that the Seller has the knowledge and authority to attest that the information on this form is true and correct.

Seller	Woodland Biomass Power, LLC
Print Name	Mark Meddock
Signature	
Title	Plant Manager
Date	6/5/2022

PACIFIC GAS AND ELECTRIC COMPANY

ATTACHMENT 6

Woodland Biomass Certification and Deviation

Reports

Woodland Biomass Power, LLC

January 26, 2023

Director, Air and Toxics Division
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901

Mr. Mat Ehrhardt, APCO
Yolo Solano AQMD
1947 Galileo Ct. Suite 103
Davis, CA 95616

Re: Title V Annual Compliance Certification Report for Woodland Biomass Power, LLC., 1786 East Kentucky Avenue, Woodland, CA 95776 / Permit F-00514-9

This compliance report is prepared in compliance with Condition E.1 of the permit which requires an annual compliance certification to be submitted. Our Title V renewal was issued on January 5, 2017. This compliance certification contains all required information of Rule 3.8 § 309 for the period from January 1, 2022 to December 31, 2022 and for ATC C-21-48 for the period January 1, 2022 to December 31, 2022.

The following table contains a summary of the applicable requirements and the compliance status and method of determination of compliance for each requirement. Permit sections that do not require monitoring or compliance certification are marked N/A (not applicable) in the compliance status column. The compliance status for each requirement is identified as continuous, intermittent, or non-compliance. The information was obtained by review of production and monitoring records and inspection of equipment.

Please do not hesitate to contact Dionisio Araza at (510) 396-3529 or myself at (530) 661-6095 if you have any questions regarding this submittal.

CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information is submitted to the best of my knowledge and belief, true, accurate and complete.



Justin Crook
Regional Operations Manager

Cc: Mary Nydam, DTE Vantage
Dionisio Araza, Woodland Biomass Power, LLC.

**Woodland Biomass Power LLC
Compliance Certification ATC C-21-48**

Reporting Period: January 1,2022 to December 31, 2022

Applicable Federal Requirement	Compliance Status	Method of Determination / Explanation of Compliance Status if Intermittent	Condition	Unit	rule citation
Permit Notification Card	Continuous	Submitted after receiving ATC	1	Facility-Wide	District Rule 3.1, §402
District Inspection	Continuous	District inspected facility for ATC	2	Facility-Wide	District Rule 3.1, §402
Construction in Effect until PTO	N/A	No construction required for ATC	3	Facility-Wide	District Rule 3.1, §407
Facility wide opacity	Continuous	Weekly site inspection PM	4	Facility-Wide	District Rule 2.3
In-Stack Opacity	Continuous	COMS system configured as per permit	5	P-105-90(t)	40 CFR60.43b(f) and (g)
Daily Opacity Block Average 10%	Continuous	COMS system configured as per permit	6	P-105-90(t)	41 CFR60.7500(a)(2)
Biomass Fuels	Continuous	Firing on fuels listed	7	P-105-90(t)	District Rule 3.1, §402
Natural gas supplementary fuel	Continuous	Natural gas consumption records	8	P-105-90(t)	District Rule 3.1, §402
Startup not to exceed 96 or 24 hours	Continuous	Records on file	9	P-105-90(t)	District Rule 2.43, §302
Startup requirements	Continuous	Records on file	10	P-105-90(t)	District Rule 3.1, §402
Measuring dp across baghouse	Continuous	PMs in place, records on file	11	P-105-90(t)	District Rule 3.1, §402
Operate CEMS	Continuous	CEMS maintained as required	12	P-105-90(t)	District Rule 3.1, §402
Monitor CO and O2 at outlet of boiler	Continuous	Analyzers installed where required	13	P-105-90(t)	40 CFR63.7525(a)(1)
Maintain CEMS	Continuous	CEMS maintained as required	14	P-105-90(t)	40 CFR63.7525(a)(2)
Maintain CO and O2 CEMS	Continuous	CEMS maintained as required	15	P-105-90(t)	40 CFR63.7525(a)(3-5)
Calculating CO averages for compliance	Continuous	CEMS configured for calculations	16	P-105-90(t)	40 CFR63.7525(a)(6)
Monitoring System in Operation	Continuous	CEMS in operation except as notes in condition	17	P-105-90(t)	40 CFR63.13(e)
Startup, Shutdown, Malfunction Plan	Continuous	Records on file	18	P-105-90(t)	40 CFR63.8(c)
QA Program and Test Plan	Continuous	Program in place	19	P-105-90(t)	40 CFR63.8(d)
QA/QC Plan	Continuous	QA/QC Plan in place	20	P-105-90(t)	District Rule 3.1, §402
Maintain boiler to minimize emissions	Continuous	Records on file, no excess emissions	21	P-105-90(t)	40 CFR63.7500(a)(3)
Exhaust stack emissions less than limits	Continuous	Records on file, no excess emissions	22	P-105-90(t)	District Rule 3.1, §402
Operate in compliance with 40 CFR 63	Continuous	Records on file, reports submitted as required	23	P-105-90(t)	40 CFR63.4(a)
Boiler Emissions lb/mmbtu	Continuous	Annual source test, quarterly records and annual reporting to AQMD	24	P-105-90(t)	District Rule 3.1, §402
Boiler Emissions lb/hr	Continuous	Annual source test, quarterly records and annual reporting to AQMD	25	P-105-90(t)	District Rule 3.1, §402
Boiler NOx Emissions	Continuous	Annual source test, quarterly records and annual reporting to AQMD	26	P-105-90(t)	40 CFR60.44b(d)

**Woodland Biomass Power LLC
Compliance Certification ATC C-21-48**

Reporting Period: January 1, 2022 to December 31, 2022

Applicable Federal Requirement	Compliance Status	Method of Determination / Explanation of Compliance Status if Intermittent	Condition	Unit	rule citation
Boiler NOx Emissions Calculation	Continuous	CEMS configured for calculations	27	P-105-90(t)	40 CFR60.46b(e)(3)
Startup and Shutdown Emissions	Continuous	Records on file	28	P-105-90(t)	40 CFR63.7500(a)(1)
5D Requirements	Continuous	Records on file and reported as required	29	P-105-90(t)	40 CFR63.7500(f)
Excursion Restoration	Continuous	None to report	30	P-105-90(t)	40 CFR64.7(d)
QIP Requirement	Continuous	No excursions to report requiring QIP	31	P-105-90(t)	40 CFR64.8(a)
QIP Development	N/A	Not required	32	P-105-90(t)	40 CFR64.8(c)
Boiler HCl Emissions lb/mmbtu	Continuous	Annual source test, quarterly records and annual reporting to AQMD	33	P-105-90(t)	40 CFR63.7500(a)(1)
Boiler Mercury Emissions lb/mmbtu	Continuous	Annual source test, quarterly records and annual reporting to AQMD	34	P-105-90(t)	40 CFR63.7500(a)(1)
Maintain sorbent injection rate	Continuous	Records on file to demonstrate	35	P-105-90(t)	40 CFR 63.7500(a)(2)
HCl limit with SO2 CEMS	Continuous	Records on file to demonstrate	36	P-105-90(t)	40 CFR 63.7500(a)(2)
Maintain SO2 CEMS	Continuous	Records on file	37	P-105-90(t)	40 CFR 63.7525(d)(1)-(5)
Operate CEMS during shutdown	Continuous	CEMS operational during shutdowns	38	P-105-90(t)	40 CFR 63.7500(a)(1)
Sorbent injection	Continuous	Records on file	39	P-105-90(t)	40 CFR 63.7525(d)(1)-(5) and (i)(1)-(2)
Minimum sorbent injection rate	Continuous	Maintaining rate, records on file	40	P-105-90(t)	40 CFR 63.7530(b)(4)(v)
DSI and SO2 CEMS	Continuous	Records on file	41	P-105-90(t)	40 CFR 63.7525(m)(1)-(6)
SO2 Determined during source test	Continuous	Determined during source test	42	P-105-90(t)	40 CFR 63.7530(b)(4)(ix)
Alternate SO2 CEMS	N/A	Not utilizing alternate SO2 demonstration	43	P-105-90(t)	40 CFR 63.7530(i)
VOC and PM10 offsets	Continuous	Calculated as required	44	Facility-Wide	District Rule 3.1, §402
Demonstrate compliance with offsets	Intermittent	Deviation report submitted for Q4 2021 offsets	45	Facility-Wide	District Rule 3.1, §402
Calculate required credits	Continuous	Calculated as required	46	Facility-Wide	District Rule 3.1, §402
Calculate credits generated	Continuous	Calculated as required	47	Facility-Wide	District Rule 3.1, §402
Distance Factors for Offsets	Continuous	Use applicable DF in calculations	48	Facility-Wide	District Rule 3.1, §402
Emission Factors for Offsets	Continuous	Use applicable EF in calculations	49	Facility-Wide	District Rule 3.1, §402
5 Year Tune Up	Continuous	Tune up completed in November 2021	50	P-105-90(t)	40 CFR 63.7515(d) and 63.7540(a)(12)
Tune up within 30 days of startup	N/A	Not required	51	P-105-90(t)	40 CFR 63.7540(a)(13)
Sampling facilities	Continuous	Sampling set up where required	52	P-105-90(t)	District Rule 3.1, §402

**Woodland Biomass Power LLC
Compliance Certification ATC C-21-48**

Reporting Period: January 1,2022 to December 31, 2022

Applicable Federal Requirement	Compliance Status	Method of Determination / Explanation of Compliance Status if Intermittent	Condition	Unit	rule citation
Annual Source Test	Continuous	Annual source test, quarterly records and annual reporting to AQMD	53	P-105-90(t)	District Rule 3.1, §402
Source Test Methods	Continuous	Source test methods reported during test plan	54	P-105-90(t)	District Rule 3.1, §402
Source Test Notification	Continuous	Source test notification made	55	P-105-90(t)	District Rule 3.1, §402
5D Test Notification	Continuous	5D test notification made	56	P-105-90(t)	40 CFR 63.7545(d)
Report Test Results within 60 days	Continuous	Test results submitted within 60 days	57	P-105-90(t)	40 CFR 63.7550(h)(1)
Reduced Testing to 3 years	N/A	Have not met requirements for reduced testing	58	P-105-90(t)	40 CFR 63.7515(a)-(c)
Develop site specific test plan	Continuous	Test plan developed	59	P-105-90(t)	40 CFR 63.7500(a)(1) and 63.7520(a)-(e)
Method Detection levels	Continuous	MDLs identified	60	P-105-90(t)	40 CFR 63.7520(f)
Fuel Analysis	N/A	Not using Fuel Analysis Method for compliance	61	P-105-90(t)	40 CFR 63.7505(c)
Fuel analysis plan requirements	N/A	Not using Fuel Analysis Method for compliance	62	P-105-90(t)	40 CFR 63.7521(a) and (b)
Fuel analysis - each type burned	N/A	Not using Fuel Analysis Method for compliance	63	P-105-90(t)	40 CFR 63.7515(e)
Fuel analysis - fuel mix	N/A	Not using Fuel Analysis Method for compliance	64	P-105-90(t)	40 CFR 63.7530(c)(1)
Fuel analysis - 90% confidence	N/A	Not using Fuel Analysis Method for compliance	65	P-105-90(t)	40 CFR 63.7530(c)(2)
Fuel analysis - HCl compliance	N/A	Not using Fuel Analysis Method for compliance	66	P-105-90(t)	40 CFR 63.7530(c)(3)
Fuel analysis - Mercury compliance	N/A	Not using Fuel Analysis Method for compliance	67	P-105-90(t)	40 CFR 63.7530(c)(4)
Fuel analysis - chlorine input	N/A	Not using Fuel Analysis Method for compliance	68	P-105-90(t)	40 CFR 63.7530(b)(1)
Fuel analysis - mercury input	N/A	Not using Fuel Analysis Method for compliance	69	P-105-90(t)	40 CFR 63.7530(b)(2)
Fuel samples during testing	Continuous	Fuel samples taken as required	70	P-105-90(t)	40 CFR 63.7521(c)
Composite samples	Continuous	Fuel samples composited as required	71	P-105-90(t)	40 CFR 63.7521(d)
Fuel analysis - pollutant concentration	N/A	Not using Fuel Analysis Method for compliance	72	P-105-90(t)	40 CFR 63.7521(e)
Report Test Results within 60 days	Continuous	Test results submitted within 60 days	73	P-105-90(t)	40 CFR 63.7515(f)
Maintain 30 day rolling averages	Continuous	CEMS records maintained	74	P-105-90(t)	40 CFR 63.7500(a)(2)
Operate O2 trim system	Continuous	Operating O2 trim as required, records on file	75	P-105-90(t)	40 CFR 63.7525(a)(7)
Compliance demonstration 180 after startup	N/A	Compliance demonstration not required	76	P-105-90(t)	40 CFR 63.7515(g)
Test Methods during performance audits	Continuous	Test methods identified for performance audits	77	P-105-90(t)	40 CFR 63.7(c)
Operate and Maintain COMS	Continuous	Records on file	78	P-105-90(t)	40 CFR 63.7525(c)(6)-(7)

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CEMS out of control periods	Continuous	CEMS configured for calculations	79	P-105-90(t)	40 CFR Part 60, Appendix F, Procedure 1, 4.3
CEMS out of control data	N/A	No out of control periods	80	P-105-90(t)	40 CFR Part 60 Appendix F, Procedure 1, 4.3.2
CEMS audits each calendar quarter	Continuous	Audits conducted as required	81	P-105-90(t)	40 CFR Part 60, Appendix F, Procedure 1, 5.1.1, 5.1
RATA every 4 quarters	Intermittent	RATA conducted outside of startup quarter, per Compliance Agreement YS-21-0002.	82	P-105-90(t)	40 CFR Part 60, Appendix F, Procedure 1, 5.1.1
CAM requirements	Continuous	Records on file	83	P-105-90(t)	40 CFR 64
Revise QA procedures	Continuous	Procedures will be revised if needed	84	P-105-90(t)	40 CFR Part 60, Appendix F, Procedure 1, 5.3
Monitor for NOx	Continuous	CEMS configured for calculations	85	P-105-90(t)	40 CFR 60.48b(c)
Conduct all monitoring during continuous operation	Continuous	CEMS records maintained	86	P-105-90(t)	40 CFR 64.7(c)
Data Collection	Continuous	CEMS records maintained	87	P-105-90(t)	40 CFR 63.7535(b)
Startup, shutdown, OOC period data	Continuous	CEMS records maintained	88	P-105-90(t)	40 CFR 63.7535(c) and (d)
1 hr average NOx emission rate	Continuous	CEMS records maintained	89	P-105-90(t)	40 CFR 60.48b(d)
Span between 60 and 80 percent	Continuous	CEMS maintained as required	90	P-105-90(t)	40 CFR 60.48b(e)(1)
COMS checks	Continuous	COMS maintained as required	91	P-105-90(t)	40 CFR 60.13(d)(2)
COMS sampling	Continuous	COMS maintained as required	92	P-105-90(t)	40 CFR 60.13(e)(1)
COMS 6 minute averages	Continuous	COMS configured for calculations	93	P-105-90(t)	40 CFR 60.13(h)(1)
COMS 6 minute, 3hr rolling average	Continuous	COMS configured for calculations	94	P-105-90(t)	40 CFR 64.3
CAM limit 10%, 3 hr rolling average	Continuous	COMS configured for calculations	95	P-105-90(t)	40 CFR 64.1
CAM limit exceedance, corrective actions	N/A	None to report	96	P-105-90(t)	40 CFR 64.3
CEMS cycles	Continuous	CEMS configured for calculations	97	P-105-90(t)	40 CFR 60.13(e)(2)
Span for measuring NOx	Continuous	CEMS maintained as required	98	P-105-90(t)	40 CFR 60.48b(e)(2)
Zero and span calibration checks	Continuous	CEMS maintained an required	99	P-105-90(t)	40 CFR 60.13(d)(1)
NOx calibration adjustments	Continuous	CEMS maintained an required	100	P-105-90(t)	40 CFR 60.13(d)(1)
Valid data calculations	Continuous	CEMS maintained an required	101	P-105-90(t)	40 CFR 60.13(h)(2)
NOx emission alternate calculations	N/A	Not utilizing alternate calculations for NOx emissions	102	P-105-90(t)	40 CFR 60.48b(f)

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Excess emissions converted to lb/mmbtu	Continuous	CEMS configured for calculations	103	P-105-90(t)	40 CFR 60.13(h)(3)
Record fuel and capacity factor	Continuous	Records on file	104	P-105-90(t)	40 CFR 60.49b(d)
Keep records of fuel type and amount	Continuous	Records on file	105	P-105-90(t)	40 CFR 63.7540(a)(2)
CMS records	Continuous	Records on file	106	P-105-90(t)	40 CFR 63.7555(b)
Operating records	Continuous	Records on file	107	P-105-90(t)	40 CFR 63.7555(c)
Fuel use records	Continuous	Records on file	108	P-105-90(t)	40 CFR 63.7555(d)(1)-(12)
Boiler emission calculation records	Continuous	Records on file	109	P-105-90(t)	District Rule 3.1, §402
Quarterly report submittals	Continuous	Reports submitted to District and EPA	110	P-105-90(t)	District Rule 3.1, §402
Biomass fuel log records	Continuous	Records on file	111	P-105-90(t)	District Rule 3.5 §501
Boiler operation records	Continuous	Records on file	112	P-105-90(t)	District Rule 3.1, §402
5D notification and report submittal records	Continuous	NOCS and Semi-Annual Reports submitted as required	113	P-105-90(t)	40 CFR 63.7555(a)
Record keeping requirements of 40 CFR 64.9	Continuous	Records on file	114	P-105-90(t)	District Rule 3.1, §402
5 year record retention	Continuous	Records kept for 5 years	115	Facility-Wide	District Rule 3.1, §402
Records available for review	Continuous	Records available for review	116	Facility-Wide	40 CFR 63.7560
Mass emission exceedance reported	Continuous	CEMS configured for calculations, none to report	117	P-105-90(t)	District Rule 3.1, §402
Report emission or operating limit	Continuous	CEMS and DAHS configured for limit alarms	118	P-105-90(t)	40 CFR 63.7540(b)
Submit semi-annual compliance reports	Continuous	Semi-Annual Compliance Reports submitted July 2021 and Jan 2022.	119	P-105-90(t)	40 CFR 63.7550(h)(3)
Compliance report information	Continuous	Reports contain required information	120	P-105-90(t)	40 CFR 63.7550(a) and (c)-(e)
30-day notification for combustion	N/A	No new combustion for notification	121	P-105-90(t)	40 CFR 63.7545(g)
Submit CEMS performance evaluations within 60 days.	Continuous	Evaluation reports submitted within 60 days.	122	P-105-90(t)	40 CFR 63.7550(h)(2)

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Insignificant Emission Units	Continuous	Exempt Equipment List	IA	Facility-Wide	40 CFR Part 70
Significant Emission Units	Continuous	The equipment in use at the plant conforms to the units described in the permit.	IB	Facility-Wide	District Rule 3.1
Flyash out-loading opacity	Continuous	Daily during operation	II.A.1	P-91-89(t)	District Rule 3.4
Boiler VOC Emissions	Continuous	Annual source test, quarterly records and annual reporting to AQMD	II.A.2	P-105-90(t)	District Rule 3.4
Boiler CO Emissions	Continuous	Annual source test, CEM system, monthly records, annual reports to AQMD	II.A.3	P-105-90(t)	District Rule 3.4
Boiler NOx Emissions	Continuous	Annual source test, CEM system, monthly records, annual reports to AQMD	II.A.4	P-105-90(t)	District Rule 3.4
Boiler SOx Emissions	Continuous	Annual source test, CEM system, monthly records, annual reports to AQMD	II.A.5	P-105-90(t)	District Rule 3.4
Boiler PM10 Emissions	Continuous	Annual source test, quarterly records and annual reporting to AQMD	II.A.6	P-105-90(t)	District Rule 3.4
Boiler Source Test Compliance	Continuous	Annual source test	II.A.7	P-105-90(t)	District Rule 3.4, §409.1
VOC (as methane) 0.05 lb/MMBtu;	Continuous	Annual source test	II.A.7a	P-105-90(t)	District Rule 3.4, §409.1
CO 0.15 lb/MMBtu;	Continuous	Annual source test	II.A.7b	P-105-90(t)	District Rule 3.4, §409.1
NOx (as NO2) 0.08 lb/MMBtu;	Continuous	Annual source test	II.A.7c	P-105-90(t)	District Rule 3.4, §409.1
SOx (as SO2) 0.04 lb/MMBtu;	Continuous	Annual source test	II.A.7d	P-105-90(t)	District Rule 3.4, §409.1
PM10 (front and back half) 0.010 gr/dscf (referenced to 12% CO2);	Continuous	Annual source test	II.A.7e	P-105-90(t)	District Rule 3.4, §409.1
PM10 (front half) 0.007 gr/dscf (referenced to 12% CO2); and	Continuous	Annual source test	II.A.7f	P-105-90(t)	District Rule 3.4, §409.1
Ammonia slip 50 parts per million by volume dry (ppmvd).	Continuous	Annual source test	II.A.7g	P-105-90(t)	District Rule 3.4, §409.1
Boiler Source Test Compliance	Continuous	Annual source test	II.A.8	P-105-90(t)	District Rule 3.4, §409.1
VOC (as methane) 17.5 lb/hr;	Continuous	Annual source test	II.A.8a	P-105-90(t)	District Rule 3.4, §409.1
CO 49.5 lb/hr;	Continuous	Annual source test	II.A.8b	P-105-90(t)	District Rule 3.4, §409.1
NOx (as NO2) 26.3 lb/hr;	Continuous	Annual source test	II.A.8c	P-105-90(t)	District Rule 3.4, §409.1
SOx (as SO2) 13.2 lb/hr;	Continuous	Annual source test	II.A.8d	P-105-90(t)	District Rule 3.4, §409.1
PM10 (front and back half) 7.2 lb/hr; and	Continuous	Annual source test	II.A.8e	P-105-90(t)	District Rule 3.4, §409.1

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PM10 (front half) 5.0 lb/hr.	Continuous	Annual source test	II.A.8f	P-105-90(t)	District Rule 3.4, §409.1
Boiler Opacity	Continuous	Continuous Opacity monitor, Quarterly reports to AQMD	II.A.9	P-105-90(t)	40 CFR 60.43b(f)
Boiler Visual Opacity Standards	Continuous	Visual Opacity monitoring	II.A.10	P-105-90(t)	40 CFR 60.43b(g)
Boiler NOx (as NO2) not to exceed 0.30 lb/MMBtu on a 30 day rolling average	Continuous	Monitored and recorded by DAHs system	II.A.11	P-105-90(t)	40 CFR 60.44b(d)
Boiler HCl not to exceed a limit of 2.0E-02 lb/mmBTU (or .27 lb/mw) not to include start up or shutdown.	Continuous	Annual source test	II.A.12	P-105-90(t)	40 CFR 63.7500(a)(1)
Boiler Mercury Emissions shall not exceed 5.7E-06 lb/mmBTU hear input or 7.3E-05 lb/MW not to include start up or shutdown	Continuous	Annual source test	II.A.13	P-105-90(t)	40 CFR 63.7500(a)(1)
Sand Screening PM10 Limits	Continuous	Documented throughput on quarterly records and annual reports to AQMD	II.A.14	P-31-94(t)	District Rule 3.4
Rice Hull PM10	Continuous	Documented throughput on quarterly and annual reports to AQMD	II.A.15	P-34-94(t)	District Rule 3.4
Hydrated Lime PM10	Continuous	Documented throughput on quarterly and annual reports to AQMD	II.A.16	P-50-94(t)	District Rule 3.4
VOC Emergency Generator	Continuous	Run time documented on quarterly records and annual reports to AQMD	II.A.17	P-51-94(t)	District Rule 3.4
CO Emergency Generator	Continuous	Run time documented on quarterly records and annual reports to AQMD	II.A.18	P-51-94(t)	District Rule 3.4
NOx Emergency Generator	Continuous	Run time documented on quarterly records and annual reports to AQMD	II.A.19	P-51-94(t)	District Rule 3.4
SOx Emergency Generator	Continuous	Run time documented on quarterly records and annual reports to AQMD	II.A.20	P-51-94(t)	District Rule 3.4
PM10 Emergency Generator	Continuous	Run time documented on quarterly records and annual reports to AQMD	II.A.21	P-51-94(t)	District Rule 3.4
VOC Emergency Fire Pump	Continuous	Run time documented on quarterly records and annual reports to AQMD	II.A.22	P-52-94(t)	District Rule 3.4
CO Emergency Fire Pump	Continuous	Run time documented on quarterly records and annual reports to AQMD	II.A.23	P-52-94(t)	District Rule 3.4

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NOx Emergency Fire Pump	Continuous	Run time documented on quarterly records and annual reports to AQMD	II.A.24	P-52-94(t)	District Rule 3.4
SOx Emergency Fire Pump	Continuous	Run time documented on quarterly records and annual reports to AQMD	II.A.25	P-52-94(t)	District Rule 3.4
PM10 Emergency Fire Pump	Continuous	Run time documented on quarterly records and annual reports to AQMD	II.A.26	P-52-94(t)	District Rule 3.4
PM10 for Fuel Material Operations	Continuous	Documented throughput on quarterly records and annual reports to AQMD	II.A.27	P-61-89(a1)	District Rule 3.4
Opacity not to exceed for a period or periods aggregating more than 3 minutes in any hour which is darker in shade than #1 Ringelmann Chart or => than 20%	Continuous	Daily operations inspections and logs	II.A.28	P-12-11(a1) P-31-94(t) P-34-94(t) P-50-94(t) P-51-94(t) P-52-94(t) P-61-89(a1) P-74-94(t) P-90-89(t) P-92-89(t) P-93-89(t)	District Rule 2.3 and 3.4
Fuel Receiving, processing, grinding and storage Opacity	Continuous	Daily operations inspections and logs	II.A.29	P-61-89(a1)	District Rule 3.4
VOC Limited Use Engine	Continuous	Tier 2 Engine requirements, run time logs	II.A.30	P-12-11	District Rule 3.4
CO Limited Use Diesel Engine	Continuous	Tier 2 Engine requirements, run time logs	II.A.31	P-12-11	District Rule 3.4
NOx Limited Use Diesel Engine	Continuous	Tier 2 Engine requirements, run time logs	II.A.32	P-12-11	District Rule 3.4
SOx Limited Use Diesel Engine	Continuous	Tier 2 Engine requirements, run time logs	II.A.33	P-12-11	District Rules 2.11 and 3.4
PM10 Limited Use Diesel Engine	Continuous	Tier 2 Engine requirements, run time logs	II.A.34	P-12-11	District Rule 3.4
Particulate Exhaust Emission	Continuous	Daily and weekly operations logs	II.A.35	P-50-94(t) P-61-89(a1) P90-89(t) P-92-89(t) P-93-89(t)	District Rule 2.11
Visible Emissions beyond property Boundaries	Continuous	Daily and weekly operations logs	II.A.36	Facility-Wide	District Rule 3.4

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PM10 Cooling Tower	Continuous	Documented throughput on quarterly records and annual reports to AQMD	II.A.37	P-74-94(t)	District Rule 3.4
PM10 Emission Hydrated Lime Receiving and Storage	Continuous	Documented throughput on quarterly records and annual reports to AQMD	II.A.38	P-90-89(t)	District Rule 3.4
PM10 Flyash Outloading and transfer	Continuous	Documented throughput on quarterly records and annual reports to AQMD	II.A.39	P-91-89(t)	District Rule 3.4
PM 10 Clay/Limestone Receiving and Storage	Continuous	Documented throughput on quarterly records and annual reports to AQMD	II.A.40	P-92-89(t)	District Rule 3.4
PM10 Sand Receiving and Storage	Continuous	Documented throughput on quarterly records and annual reports to AQMD	II.A.41	P-93-89(t)	District Rule 3.4
Emergency use engines must use CARB Diesel Fuel	Continuous	Operated only during the times outlined in the permit condition	II.B.1	P-51-94(t) P-52-94(t)	District Rule 3.1, §400
Emergency Generator Maintenance and Testing Hour Limit	Continuous	IC Engine Operating log, Run time documented on annual reports to AQMD	II.B.2	P-51-94(t)	District Rule 3.4, §409.1
Emergency Generator Maintenance and Testing Hour Limit	Continuous	IC Engine Operating log, Run time documented on annual reports to AQMD	II.B.3	P-51-94(t)	District Rule 3.4, §409.2
Emergency Generator emergency operation	Continuous	System Design and Procedures	II.B.4	P-51-94(t)	District Rule 3.4
Emergency Generator NFPA 25 testing	Continuous	Fuel throughput documented on annual reports to AQMD	II.B.5	P-51-94(t)	District Rule 3.4
Emergency Fire Pump Limited to pumping water for fire fighting	Continuous	Fuel throughput documented on annual reports to AQMD	II.B.6	P-52-94(t)	District Rule 3.4
Emergency Use Engines shall not exceed 200 total hours per calendar year.	Continuous	IC Engine Operating log, Run time documented on annual reports to AQMD	II.B.7	P-51-94(t) P-52-94(t)	District Rule 3.4, §409.1
Emergency Generator not to be used to supply power to the utility	Continuous	Policy and Procedures	II.B.8	P-51-94(t)	District Rule 3.4
Emergency Generator Fuel Use limit	Continuous	IC Engine Operating log, Run time documented on annual reports to AQMD	II.B.9	P-51-94(t)	District Rule 3.4, §409.1
Emergency Generator Operate and Maintain consistent with safety and good air pollution control practices	Continuous	Semi-annual Inspection and Maintenance by an authorized vendor.	II.B.10	P-51-94(t)	40 CFR 63.6605

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Emergency Fire pump Fuel Use limit	Continuous	IC Engine Operating log, Run time documented on annual reports to AQMD	II.B.11	P-52-94(t)	District Rule 3.4
Emergency Fire pump oil, air, hoses and belt maintenance	Continuous	Semi-annual Inspection and Maintenance by an authorized vendor.	II.B.12	P-52-94(t)	40 CFR 63.6602
Emergency Fire Pump shall be maintained per manufactures' emission related written instructions	Continuous	Semi-annual Inspection and Maintenance by an authorized vendor.	II.B.13	P-52-94(t)	40 CFR 63.6625(e)
Emergency Fire Pump may utilized an oil analyses program	Continuous	Facility utilizes an oil analyses program, managed by an outside vendor.	II.B.14	P-52-94(t)	40 CFR 63.6625(i)
Startup/ Shutdown CFB	Continuous	Flue gas and combustion zone temperature gauges.	II.B.15	P-105-90(t)	District Rule 2.43, 302
Baghouse module DP	Continuous	Baghouse is equipped as required	II.B.16	P-105-90(t)	District Rule 3.1
Boiler VOC and facility PM10 quarterly offsets	Continuous	Fuel records and quarterly records	II.B.17	P-105-90(t)	District Rule 3.4, §409.1
Permissible biomass fuels and supplemental fuel	Continuous	Fuel records and quarterly records	II.B.18	P-105-90(t)	District Rule 3.4, §409.1
Boiler Natural Gas	Continuous	Natural gas consumption records	II.B.19	P-105-90(t)	District Rule 3.4, §409
Boiler CEM System	Continuous	Documented monthly records available to AQMD	II.B.20	P-105-90(t)	District Rule 3.4, §409
Offset credits Required	Continuous	Methodology adopted in Quarterly reporting	II.B.21	P-105-90(t)	District Rule 3.4, §409
Offset credits Generated	Continuous	Methodology adopted in Quarterly reporting	II.B.22	P-105-90(t)	District Rule 3.4, §409
Offset Distance Factor	Continuous	Methodology adopted in Quarterly reporting	II.B.23	P-105-90(t)	District Rule 3.4, §409
Emission Factors	Continuous	Methodology adopted in Quarterly reporting	II.B.24	P-105-90(t)	District Rule 3.4, §409
Qualified Ag Biomass	Continuous	Methodology adopted in Quarterly reporting	II.B.25	P-105-90(t)	District Rule 3.4, §409
Start up fuel - Natural gas or clean, dry biomass	Continuous	Policy and Procedures	II.B.26	P-105-90(t)	40 CFR 63.7500(a)(1)
Boiler Startup definition - Utilizes Definition 1	Continuous	Policy and Procedures	II.B.27	P-105-90(t)	40 CFR 63.7575
Boiler Emissions excluded during startup and shutdown	Continuous	DAHs	II.B.28	P-105-90(t)	40 CFR 63.7555
Boiler Operations of CEMS System	Continuous	Continuous CEMS system	II.B.29	P-105-90(t)	40 CFR 63.7500(a)(1)
Boiler Opacity	Continuous	Source test	II.B.30	P-105-90(t)	40 CFR 63.7500(a)(2)
Boiler Sorbent or carbon injection rate	Continuous	Daily operations inspections and logs	II.B.31	P-105-90(t)	40 CFR 63.7575

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40 CFR 63 Subpart DDDDD using Source Testing	Continuous	Annual Source testing	II.B.32	P-105-90(t)	40 CFR 63.7500(a)(2)
Boiler HCl Emissions using SO2 Cems - 30 day average	Continuous	DAHS, quarterly reporting, Annual Source testing	II.B.33	P-105-90(t)	40 CFR 63.7500(a)(2)
Boiler - operate and maintain the boiler in a manner consistent with safety and good air pollution control practices.	Continuous	Work order system & maintenance records	II.B.34	P-105-90(t)	40 CFR 63.7500(a)(3)
Boiler emission limits, work practice standards and operating limits of 40 CFR 63 Subpart DDDDD	Continuous	Monitored and recorded by DAHs system	II.B.35	P-105-90(t)	40 CFR 63.7500(f)
SO2 CEMs operating limits per 40 CFR 63 Subpart DDDDD	Continuous	Annual Source test	II.B.36	P-105-90(t)	40 CFR 63.7530(i)
Energy Conservation Implementation Plan	N/A	Currently not seeking to utilize energy Conservations efficiency credits	II.B.37	Facility-Wide	40 CFR 63.7533(a)-(f)
Startup definition per 40 CFR 63.7575	N/A	The Facility is able to engage and operate PM Controls with 1 hour of the first firing of fuel	II.B.38	P-105-90(t)	40 CFR 63.7555(d)(13)
Sand Screening throughput Limits	Continuous	Documented through quarterly records and annual reports to AQMD	II.B.39	P-31-94(t)	District Rule 3.4
Rice Hull Receiving Limits	Continuous	Documented through quarterly records and annual reports to AQMD	II.B.40	P-34-94(t)	District Rule 3.4
Rice Hull Metering Limits	Continuous	Documented through quarterly records and annual reports to AQMD	II.B.41	P-34-94(t)	District Rule 3.4
Rice Hull Dust Suppression	Continuous	Daily and weekly operations logs	II.B.42	P-34-94(t)	District Rule 3.4
Rice Hull Fugitive Dust	Continuous	Daily and weekly operations logs	II.B.43	P-34-94(t)	District Rule 3.4
Hydrated Lime Blending Limits	Continuous	Documented through quarterly records and annual reports to AQMD	II.B.44	P-50-94(t)	District Rule 3.4
Hydrated Lime Loading Limits	Continuous	Documented through quarterly records and annual reports to AQMD	II.B.45	P-50-94(t)	District Rule 3.4
Fuel Handling Limits	Continuous	Documented through quarterly records and annual reports to AQMD	II.B.46	P-61-89(t)	District Rule 3.4
Fuel Grinding Limits	Continuous	Documented through quarterly records and annual reports to AQMD	II.B.47	P-61-89(t)	District Rule 3.4

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Fuel Handling Control Equipment	Continuous	Documented on daily logs	II.B.48	P-61-89(t)	District Rule 3.4
Fuel Handling Waste Material	Continuous	Daily operations inspections and logs	II.B.49	P-61-89(t)	District Rule 3.4
Fuel Grinding Dust Controls	Continuous	Daily operations inspections and logs	II.B.50	P-61-89(t)	District Rule 3.4
Biomass Offset Inventory	Continuous	Methodology adopted in Quarterly reporting	II.B.51	P-61-89(t)	
Limited Use Engine Throughput Limits	Continuous	Documented on quarterly records and annual reports to AQMD	II.B.52	p-12-11(a1)	District Rule 3.4
Portable Grinder Wood Limits	Continuous	Daily operations inspections and logs	II.B.53	p-12-11(a1)	District Rule 3.4 §409.1
Limited use Engine	Continuous	Documented on daily logs	II.B.54	p-12-11(a1)	District Rule 3.4
Limited use Engine/Grinder	Continuous	Documented on daily logs	II.B.55	p-12-11(a1)	District Rule 3.4
Rental Equipment shall not be located at the facility for more then 12 months	Continuous	Documented in IC Engine Log Book	II.B.56	p-12-11(a1)	District Rule 3.1 §402
Limited use Engine Notification	Continuous	Records of notification on file	II.B.57	p-12-11(a1)	District Rule 3.4
Limited use Engine Fuel	Continuous	Fuel Receipts	II.B.58	p-12-11(a1)	District Rule 3.1 §402
Air Toxics "Hot Spots" requirements	Continuous	All equipment meets requirements.	II.B.59	Plant wide	District Rule 3.4
Re-evaluation Rights	Continuous	The district has the right to request re-evaluation	II.B.60		District Rule 3.4
Cooling Tower water circulation limits	Continuous	Documented through quarterly records and annual reports to AQMD	II.B.61	P-74-94(t)	District Rule 3.4
Cooling Tower water makeup limits	Continuous	Documented through quarterly records and annual reports to AQMD	II.B.62	P-74-94(t)	District Rule 3.4
Cooling Tower Hexavalent Chromium	Continuous	Documented with chemical addition lists	II.B.63	P-74-94(t)	District Rule 3.4
Hydrated Lime Silo Limits	Continuous	Documented through quarterly records and annual reports to AQMD	II.B.64	P-90-89(t)	District Rule 3.4
Hydrated Lime Injection Limits	Continuous	Documented through quarterly records and annual reports to AQMD	II.B.65	P-90-89(t)	District Rule 3.4
Flyash Out-Loading Limits	Continuous	Documented through quarterly records and annual reports to AQMD	II.B.66	P-91-89(t)	District Rule 3.4
Flyash Offsets	Continuous	Methodology adopted in Quarterly reporting	II.B.67	P-91-89(t)	District Rule 3.1 §402
Flyash Mixer Operation	Continuous	Weekly site inspection	II.B.68	P-91-89(t)	District Rule 3.4
Flyash Operations	Continuous	Weekly site inspection	II.B.69	P-91-89(t)	District Rule 3.4
Limestone Limits	Continuous	Documented through quarterly records and annual reports to AQMD	II.B.70	P-92-89(t)	District Rule 3.4

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Sand Silo Limits	Continuous	Documented through quarterly records and annual reports to AQMD	II.B.71	P-93-89(t)	District Rule 3.4
Boiler & Emergency Engines shall not be operated in violation of the requirements of 40 CFR 63	Continuous	Facility Procedures	II.B.72	P-105-90(t) P-51-94(t) P-52-94(t)	40 CFR 63.4(a)
Compliance Assurance	Continuous	Adopted Compliance Assurance Monitoring Plan	II.B.73	Facility-Wide	40 CFR 64.7
Boiler CEM System	Continuous	System is in place, certified through annual RATA during source test, QA/QC Procedures	II.C.1	P-105-90(t)	District Rule 3.1 §402
CEM QA Plan	Continuous	QA/QC Plan Developed and Implemented	II.C.2	P-105-90(t)	District Rule 3.1 §402
Stack Testing Ports	Continuous	Stack test ports and platforms are in place	II.C.3	P-105-90(t)	District Rule 3.1 §303.2
Annual source testing Methods approval from District required	Continuous	Source Testing protocol submittal	II.C.4	P-105-90(t)	District Rule 3.4 §409.1
Annual source test	Continuous	Annual source test completed Dec 2021, per Compliance Agreement YS-21-0002	II.C.5	P-105-90(t)	District Rule 3.1 §402
Annual source test	Continuous	Source test protocol submitted to District prior to testing	II.C.6	P-105-90(t)	District Rule 3.1 §402
Source test notification	Continuous	Notification and reporting as per permit requirements	II.C.7	P-105-90(t)	District Rule 3.1 §402
Boiler Daily limit Notification	Continuous	Plant procedures, breakdown reports	II.C.8	P-105-90(t)	District Rule 3.1 §405.4
Boiler CEM System	Continuous	Plant procedures, QA/QC plan	II.C.9	P-105-90(t)	40 CFR 60.13(e)
Daily CEM Calibration	Continuous	CEM system configuration and procedures	II.C.10	P-105-90(t)	40 CFR 60.13(d)(1)
Daily Calibration Adjustments	Continuous	Plant procedures, QA/QC plan	II.C.11	P-105-90(t)	40 CFR 60.13(d)(1)
Boiler Opacity Span Between 60% & 80%	Continuous	CEM system configuration and procedures	II.C.12	P-105-90(t)	40 CFR 60.48b(e)(1)
Boiler Opacity Monitoring System	Continuous	CEM system configuration and procedures	II.C.13	P-105-90(t)	40 CFR 60.13(d)(2)
COMS (continued opacity monitoring system) Sampling Cycle	Continuous	COMS system configured as per permit	II.C.14	P-105-90(t)	40 CFR 60.13(e)(2)
CEM Sampling Cycle	Continuous	CEM system configured as per permit	II.C.15	P-105-90(t)	40 CFR 60.13(e)(2)
COMS System Averages	Continuous	COMS system configured as per permit	II.C.16	P-105-90(t)	40 CFR 60.13(h)(2)
CEM System Averages	Continuous	CEM system configured as per permit	II.C.17	P-105-90(t)	40 CFR 60.13(h)
Boiler NOx, PM and Opacity Conversion	Continuous	DAHS system configured as per permit	II.C.18	P-105-90(t)	40 CFR 60.46b(e)(3)

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NOx 30 Day Rolling Avg	Continuous	CEM system configured as per permit, reported quarterly to AQMD	II.C.19	P-105-90(t)	40 CFR 60.48b(c)
NOx Data Recording	Continuous	CEM system configured as per permit	II.C.20	P-105-90(t)	40 CFR 60.48b(d)
NOx 1 hour averages	Continuous	CEM system configured as per permit	II.C.21	P-105-90(t)	40 CFR 60.48b(d)
NOx Span Values	Continuous	CEM system configured as per permit	II.C.22	P-105-90(t)	40 CFR 60, appendix B
Alternative NOx data	Continuous	Part of QA/QC plan	II.C.23	P-105-90(t)	40 CFR 60.48b(f)
CEM Zero/Span Drift	Continuous	Part of QA/QC plan	II.C.24	P-105-90(t)	40 CFR 60, Appendix F, Procedure 1, 4.3
CEM out of control	Continuous	QA/QC plan, CEM system configuration	II.C.25	P-105-90(t)	40 CFR 60, Appendix F, Procedure 1, 4.3.2
CEM Audit	Continuous	Quarterly calibration gas audits performed as per permit, QA/QC plan	II.C.26	P-105-90(t)	40 CFR 60, Appendix F, Procedure 1, 5.1
CEM RATA	Intermittent	Annual RATA performed Dec 2021, outside of the quarter that the unit started up, per Compliance Agreement YS-21-0002	II.C.27	P-105-90(t)	40 CFR 60, Appendix F, Procedure 1, 5.1.1
Excess CEM inaccuracies	Continuous	Part of QA/QC plan	II.C.28	P-105-90(t)	40 CFR 60, Appendix F, Procedure 1, 5.3
Opacity 3 hour average	Continuous	CEM system configured as per permit	II.C.29	P-105-90(t)	40 CFR 64.3
CEM availability	Continuous	CEM off time reported through breakdown reports and monthly reports, QC plan	II.C.30	P-105-90(t)	40 CFR 64.7(c)
Opacity excursion corrective actions	Continuous	Baghouse inspection procedure	II.C.31	P-105-90(t)	40 CFR 64.3
Opacity excursion, exceedance Limits	Continuous	Continuous Opacity Monitor	II.C.32	P-105-90(t)	40 CFR 64.1
Excursion/exceedance recovery	Continuous	Plant procedures	II.C.33	P-105-90(t)	40 CFR 64.7(d)
Quality Improvement Plan	Continuous	Quarterly report for NOx and Opacity	II.C.34	P-105-90(t)	40 CFR 64.8(a)
QIP Implementation	Continuous	Conditions to trigger the QIP not present during reporting period	II.C.35	P-105-90(t)	40 CFR 64.8(c)
Performance audits to determine compliance with requirements for 40 CFR 63 DDDDD	Continuous	Source testing	II.C.36	P-105-90(t)	40 CFR 63.7(c)

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Written startup, shutdown and malfunction plan for CEMS	Continuous	Plant Procedures	II.C.37	P-105-90(t)	40 CFR 63.8(c)
Boiler Continuous Monitoring system QC Plan	Continuous	Plan in Place	II.C.38	P-105-90(t)	40 CFR 63.8(d)
HCl, Mercury Compliance	Continuous	Source Test	II.C.39	P-105-90(t)	40 CFR 63.7505(c)
Monitoring Plan	Continuous	Plan on Site	II.C.40	P-105-90(t)	40 CFR 63.7505(d)(1)-(2) 40 CFR 63.7525(c)(5)
Performance evaluation of each CMS Per Monitor Plan	Continuous	Records on site	II.C.41	P-105-90(t)	40 CFR 63.7505 (d)(3)
Operate and maintain the CEMS in Continuous operation according to Monitoring Plan	Continuous	Per Monitoring Plan	II.C.42	P-105-90(t)	40 CFR 63.7505 (d)(4)
Conduct Boiler Tune up and Compliance Demonstration	Continuous	Completed 11/2021, due again 2026.	II.C.43	P-105-90(t)	40 CFR 63.7540 (a)(10)
Source Testing Annual decreased to 3 years	Continuous	Have not yet met the parameters to conduct source testing every 3 years	II.C.44	P-105-90(t)	40 CFR 63.7515(a)-(c)
Boiler Tuning Every Five Years	Continuous	Records on site, Boiler is equipped with an oxygen trim system that maintains an optimum air to fuel ratio.	II.C.45	P-105-90(t)	40 CFR 63.7515(d)
HCl Compliance based on Fuel Sample	N/A	HCl Compliance is based on Source testing	II.C.46	P-105-90(t)	40 CFR 63.7515(e)
Source Test Submittal	Continuous	Source test report submitted within 60 days	II.C.47	P-105-90(t)	40 CFR 63.7515(f)
Compliance Demonstration	Continuous	Have operated since the previous compliance demonstration	II.C.48	P-105-90(t)	40 CFR 63.7515(g)
Not Subject to Oxygen Concentration operating limits	Continuous	Facility has a CO CEMS	II.C.49	P-105-90(t)	40 CFR 63.7515(i)
Source Test Protocols	Continuous	Source test protocol submitted to District prior to testing	II.C.50	P-105-90(t)	
Detection Level	Continuous	Source test Report	II.C.51	P-105-90(t)	40 CFR 63.7520(f)
Fuel Analysis plan	N/A	Using Source Testing for Compliance with Chloride and Mercury	II.C.52	P-105-90(t)	
Fuel Analyses	Continuous	Source Testing Report	II.C.53	P-105-90(t)	
Fuel Analyses composite sample	Continuous	Fuel Sample procedure	II.C.54	P-105-90(t)	

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Conduct Fuel samples per Table 6 and equations 7,8 and 9 of 40 CFR 63 Subpart DDDDD.	Continuous	Records maintained on site	II.C.55	P-105-90(t)	40 CFR 63.7521(e)
CO and O2 CEMS Analyzers Probe	Continuous	Probe is located at the same outlet for both CO and O2	II.C.56	P-105-90(t)	40 CFR 63.7525(a)(1)
CO and O2 Cems Performance evaluations	Continuous	RATA Reports Submitted to district	II.C.57	P-105-90(t)	40 CFR 63.7525(a)(2)
CO and O2 CEMS Sampling	Continuous	Recorded by DAHs	II.C.58	P-105-90(t)	40 CFR 63.7525(a)(3)-(5)
CO Data Averages	Continuous	Recorded by DAHs	II.C.59	P-105-90(t)	40 CFR 63.7525(a)(6)
Oxygen Trim System Operations	Continuous	Records maintained on site	II.C.60	P-105-90(t)	40 CFR 63.7525(a)(7)
Continuous Opacity Monitoring System	Continuous	Installed	II.C.61	P-105-90(t)	40 CFR 63.7525(c)(1)-(4)
COMS Operate and maintain according to Monitoring Plan	Continuous	Monitoring Plan on Site	II.C.62	P-105-90(t)	40 CFR 63.7525(c)(6)-(7)
SO2 Sampling	Continuous	Recorded by DAHs	II.C.63	P-105-90(t)	40 CFR 63.7525(d)(1)-(5)
Flow Monitoring System Flow sensor - Conduct a flow monitoring system performance evaluation per site monitoring plan	Continuous	Records on Site, performed by Cisco	II.C.64	P-105-90(t)	40 CFR 63.7525(e)(1)-(4)
HCl - Wet Acid Gas scrubber	N/A	Using Source Testing for Compliance with SO2 CEMS Analyzer	II.C.65	P-105-90(t)	40 CFR 63.7525(d)(1)-(5) and (g)(1)-(4)
Sorbent Injection Rate	Continuous	Records maintained on site	II.C.66	P-105-90(t)	40 CFR 63.7525(j)(1)-(6)
Bag leak detection system	N/A	Not using a bag leak detection system	II.C.67	P-105-90(t)	40 CFR 63.7525(j)(1)-(6)
Mercury or HCl CEMS	N/A	Not demonstrating compliance with a Mercury or HCl CEMS	II.C.68	P-105-90(t)	40 CFR 63.7525(l)(1)-(7)
SO2 CEMS for HCl Compliance demonstrations	Continuous	Records maintained on site	II.C.69	P-105-90(t)	40 CFR 63.7525(l)(8)
Compliance with HCl Emission limit using SO2 CEMS	Continuous	Recorded by DAHs, logbook and PI Database	II.C.70	P-105-90(t)	40 CFR 63.7525(m)(1)-(6)
Compliance source Test	N/A	Completed 12/29/21-12/30/21	II.C.71	P-105-90(t)	40 CFR 63.7530(a)&(B)
Fuel Analysis Requirement for Chlorine	N/A	Not subject to fuel analysis Requirement	II.C.72	P-105-90(t)	40 CFR 63.7530(b)(1)
Fuel Analysis Requirement for mercury	N/A	Not subject to fuel analysis Requirement	II.C.73	P-105-90(t)	40 CFR 63.7530(b)(2)
Sorbent injection rate during three run source test for HCl Limit demonstration	Continuous	Source Test	II.C.74	P-105-90(t)	40 CFR 63.7530(b)(4)(v)

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Carbon Injection for Mercury Limit	N/A	Not utilizing	II.C.75	P-105-90(t)	40 CFR 63.7530(b)(4)(vi)
Fabric Filter bag leak detection	N/A	Not utilizing	II.C.76	P-105-90(t)	40 CFR 63.7530(b)(4)(vii)
Maximum SO2 Emission Rate	Continuous	Source Test	II.C.77	P-105-90(t)	40 CFR 63.7530(b)(4)(ix)
Fuel Analysis Compliance if burning more than one fuel type	N/A	one fuel type	II.C.78	P-105-90(t)	40 CFR 63.7530(c)(1)
Emission compliance through fuel analyses	N/A	Not using fuel analyses for Emission Compliance	II.C.79	P-105-90(t)	40 CFR 63.7530(c)(2)
HCl emission limit through fuel analysis	N/A	Not using fuel analyses for Emission Compliance	II.C.80	P-105-90(t)	40 CFR 63.7530(c)(3)
Mercury emission limit through fuel analysis	N/A	Not using fuel analyses for Emission Compliance	II.C.81	P-105-90(t)	40 CFR 63.7530(c)(4)
Submit Notification of Compliance Status	N/A	Completed	II.C.82	P-105-90(t)	40 CFR 63.7530(e)&(f)
Energy Conservation efficiency credits	N/A	Not utilizing	II.C.83	Facility-Wide	40 CFR 63.7533(g)
CEMS Monitoring and Collect Data during all required intervals at all times the boiler is operating	Continuous	Recorded by DAHS	II.C.84	P-105-90(t)	40 CFR 63.7535(b)
Data Averages not to include Startup, shutdown, malfunctions or out of control periods	Continuous	Recorded by DAHS	II.C.85	P-105-90(t)	40 CFR 63.7535(c) & (d)
HCl Compliance with Fuel analysis and new fuel type	N/A	Not utilizing	II.C.86	P-105-90(t)	40 CFR 63.7540(a)(3)
HCl Source Test and new fuel type	N/A	No new fuel type	II.C.87	P-105-90(t)	40 CFR 63.7540(a)(4)
Mercury Compliance with Fuel analysis and new fuel type	N/A	Not utilizing	II.C.88	P-105-90(t)	40 CFR 63.7540(a)(5)
Mercury Source Test and new fuel type	N/A	No new fuel type	II.C.89	P-105-90(t)	40 CFR 63.7540(a)(6)
Compliance with a fabric filter bag leak detection system	N/A	Not utilizing	II.C.90	P-105-90(t)	40 CFR 63.7540(a)(7)
Boiler Tune-up every 5 years	Continuous	Last one completed 11/2021	II.C.91	P-105-90(t)	40 CFR 63.7540(a)(12)
Boiler within 30 calendar days of startup if unit isn't operating on required date for tune up	N/A	Completed per requirement.	II.C.92	P-105-90(t)	40 CFR 63.7540(a)(13)
Mercury CEMS	N/A	Not utilizing a mercury CEMS	II.C.93	P-105-90(t)	40 CFR 63.7540(a)(14)

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HCI CEMS	N/A	Not Utilizing a HCI CEMS	II.C.94	P-105-90(t)	40 CFR 63.7540(a)(15)
Deviation Report for applicable emission or operating limits not met	Continuous	Deviation reports sent to AQMD, Records maintained on site	II.C.95	P-105-90(t)	40 CFR 63.7540(b)
Source Test Notification	Continuous	Submitted as required.	II.C.96	P-105-90(t)	40 CFR 63.7545(d)
Source Test Results	Continuous	Not yet received from Dec 2021 testing. Previous test report submitted as required.	II.C.97	P-105-90(t)	40 CFR 63.7545(e)
Notice of commence or recommence combustion of solid waste	N/A	Combustion of solid waste was continuous	II.C.98	P-105-90(t)	40 CFR 63.7545(g)
Different subcategory for the boiler due to physical change or fuel switch	N/A	Not applicable	II.C.99	P-105-90(t)	40 CFR 63.7545(h)
Compliance Report	Continuous	Reports submitted to district	II.C.100	P-105-90(t)	40 CFR 63.7550(a) & (c)-(e)
Source tests and fuel analysis submit to district within 60 days.	Continuous	Reports submitted to district	II.C.101	P-105-90(t)	40 CFR 63.7550(h)(1)
CEMS Performance Evaluations submit to district within 60 days	Continuous	Reports submitted to district	II.C.102	P-105-90(t)	40 CFR 63.7550(h)(2)
Submit Semi-Annual Compliance Reports to district	Continuous	Reports submitted to district	II.C.103	P-105-90(t)	40 CFR 63.7550(h)(3)
Emergency Engines Non resettable hour meters with a minimum display of 9,999 hours	N/A	Installed	II.C.104	P-51-94(t) P-52-94(t)	District Rule 3.1
Sand Receiving and Storage throughput	Continuous	Weight tickets, quarterly offset report, annual throughput report	II.D.1	P-93-89(t)	District Rule 3.1
Rice Hull Throughput	Continuous	Weight tickets, quarterly offset report, annual throughput report	II.D.2	P-34-94(t)	District Rule 3.1
Clay/Limestone Throughput	Continuous	Weight tickets, quarterly offset report, annual throughput report	II.D.3	P-92-89(t)	District Rule 3.1
Emergency engine records	Continuous	Run time logs	II.D.4	P-51-94(t)	District Rule 3.1
Emergency engine records	Continuous	Run time logs	II.D.5	P-52-94(t)	District Rule 3.1
Emergency engine records Retention	Continuous	Run time logs	II.D.6	P-51-94(t) P-52-94(t)	District Rule 3.1, §402 District Rule 3.8, §302.6(b)
Emergency engine maintenance records	Continuous	Work order system & maintenance records	II.D.7	P-51-94(t) P-52-94(t)	40 CFR 63.6655
Cooling Tower records	Continuous	Annual throughput Report	II.D.8	P-74-94(t)	District Rule 3.1 §402

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Sand Receiving, hydrated lime & Clay/limestone Records	Continuous	Weight tickets, quarterly offset report, annual throughput report	II.D.9	P-90-89(t) P-92-89(t) P-93-89(t)	District Rule 3.1 §402
Flyash out-flow records	Continuous	Weight tickets, quarterly offset report, annual throughput report	II.D.10	P-91-89(t)	District Rule 3.1
Biomass in-flow records	Continuous	Weight tickets, quarterly offset report, annual throughput report	II.D.11	P-105-90(t)	District Rule 3.5, §501
Boiler Recordkeeping	Continuous	Records maintained on site	II.D.12	P-105-90(t)	District Rule 3.1 §402
Records retained for 5 years	Continuous	Records maintained on site	II.D.13	P-105-90(t)	District Rule 3.1 §402
Boiler Daily fuel consumption	Continuous	Records maintained on site	II.D.14	P-105-90(t)	40 CFR 60.49b(d)
Boiler Recordkeeping	Continuous	Records maintained on site	II.D.15	P-105-90(t)	District Rule 3.1 §402
Quarterly Reporting	Continuous	Reporting as required by permit	II.D.16	P-105-90(t)	40 CFR 60.7(a)(7)(c)
Boiler Daily fuel Records demonstrate HCl & Mercury	Continuous	Records maintained on site	II.D.17	P-105-90(t)	40 CFR 60.49b(d)
40 CFR 63 Subpart DDDDD Recordkeeping	Continuous	Records maintained on site	II.D.18	P-105-90(t)	41 CFR 63.7555(a)
Boiler CEMS Recordkeeping	Continuous	Records maintained on site	II.D.19	P-105-90(t)	
Boiler Emission Compliance Recordkeeping	Continuous	Records maintained on site	II.D.20	P-105-90(t)	
Boiler Fuel Compliance Recordkeeping	Continuous	Weight tickets, quarterly offset report, annual throughput report	II.D.21	P-105-90(t)	
Boiler Implementation Plan Recordkeeping	N/A	Not utilizing efficiency credits	II.D.22	P-105-90(t)	40 CFR 63.7533
Recordkeeping and retention for measurement, maintenance, corrective action, report or record.	Continuous	Records maintained on site	II.D.23	P-105-90(t)	40 CFR 63.7560
Limited IC engine Recordkeeping	Continuous	Records maintained on site	II.D.24	P-12-11(a1)	District Rule 3.1
Boiler Recordkeeping and reporting of 40 CFR part 64.9	Continuous	Records maintained on site	II.D.25	P-105-90(t)	40 CFR 64
Fuel material Receiving, Processing, grinding, and storage operations Recordkeeping	Continuous	Records maintained on site	II.D.26	P-61-89(a1)	District Rule 3.4
Facility wide opacity	Continuous	Weekly site inspection PM	III.A.1	Facility-Wide	District Rule 2.3

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Applicable Federal Requirement	Compliance Status	Method of Determination / Explanation of Compliance Status if Intermittent	Condition	Unit	rule citation
Nuisance air discharge	Continuous	Weekly site inspection PM	III.B.1	Facility-Wide	District Rule 2.5 (local)
Circumvention	Continuous	Management of change process	III.C.1	Facility-Wide	District Rule 2.17
Authorization to Construct	Continuous	Management of change process	III.D.1	Facility-Wide	District Rule 3.1 § 301.1
Unauthorized use	Continuous	Management of change process	III.D.2	Facility-Wide	District Rule 3.1 § 302.2
New Permits	Continuous	Management of change process	III.D.3	Facility-Wide	District Rule 3.1 § 302.2
PTO Non Transferable from one location to another or from one piece of equipment to another.	Continuous	Management of change process	III.D.4	Facility Wide	District Rule 3.1 § 305
PTO Annual Renewed	Continuous	Payable system	III.D.5	Facility Wide	District Rule 3.1 and 4.1
PTO Acceptance	Continuous	N/A	III.D.6	Facility Wide	District Rule 3.1 § 402
Annual Throughput/Production Report	Continuous	Reports submitted annually	III.D.7	Facility Wide	District Rule 3.1 § 405.1
Breakdown Notification	Continuous	Plant procedures, breakdown reports. Reports submitted for 12/21/21, 12/22/21, 12/27/21 and 12/29/21 breakdowns.	III.D.8	Facility-Wide	District Rule 3.1 § 405.3
Excess Emissions Notification	Continuous	Excess Emissions Report sent to AQMD	III.D.9	Facility-Wide	District Rule 3.1 § 405.4
PTO to be Posted	Continuous	PTO Posted in the Control Building	III.D.10	Facility-Wide	District Rule 3.1 § 408
Right of Entry	Continuous	Entry authorized for regulatory officials	IV.A.1	Facility-Wide	District Rule 3.1 § 302.10
Title V Conditions	Continuous	Compliance verified on quarterly and annual reports to the AQMD	IV.B.1	Facility-Wide	Rule 3.8 § 302.11a
Property Rights	Continuous	The plant made no claims of exclusive privilege during reporting period.	IV.B.2	Facility-Wide	Rule 3.8 § 302.11b
Permit Non-Compliance	Continuous	No permits were terminated, revoked and reissued, or enforcement action this reporting period.	IV.B.3	Facility-Wide	Rule 3.8 § 302.11c
Defense for non-compliance	Continuous	No claims of “need to halt or reduce a permitted activity in order to maintain compliance” as a defense for non-compliance this reporting period.	IV.B.4	Facility-Wide	Rule 3.8 § 302.11d
Pending Permit action to stay a permit condition	Continuous	These conditions did not occur during the reporting period.	IV.B.5	Facility-Wide	Rule 3.8 § 302.11e
Reasonable time	Continuous	Facility will comply with all requests for data in a timely manner.	IV.B.6	Facility-Wide	Rule 3.8 § 302.11f

**Woodland Biomass Power LLC
Compliance Certification**

Reporting Period:

January 1, 2022 to December 31, 2022

Applicable Federal Requirement	Compliance Status	Method of Determination / Explanation of Compliance Status if Intermittent	Condition	Unit	rule citation
Emergency Event	Continuous	As needed	IV.C.1	Facility-Wide	District Rule 3.8 § 302.12
Severability	Continuous	No parts of the permit were judged to be unconstitutional or invalid during this reporting period.	IV.D.1	Facility-Wide	Rule 3.8 § 302.13
Compliance Certification	Continuous	Annually submitted, this report	IV.E.1	Facility-Wide	Rule 3.8 § 302.14a
Compliance Certification	Continuous	This report format	IV.E.2	Facility-Wide	Rule 3.8 § 302.14b
Compliance Certification	Continuous	This report format	IV.E.3	Facility-Wide	Rule 3.8 § 302.14c
Compliance Certification	Continuous	As needed	IV.E.4	Facility-Wide	Rule 3.8 § 302.14d
Title V Expiration	Continuous	Current permit expired January 5, 2022. Renewal application submitted April 2021. Waiting on renewed Title V.	IV.F.1	Facility-Wide	Rule 3.8 § 302.15
Title V Permit Fees	Continuous	Permit fees paid as invoiced	IV.G.1	Facility-Wide	Rule 3.8 § 302.16
Permit Revision Exemption	Continuous	Plant did not participate in programs listed in the permit condition.	IV.H.1	Facility-Wide	40 CFR 70
Title V Renewal	Continuous	Submitted April 2021 as required.	IV.I.1	Facility-Wide	Rule 3.8 § 402.2
Significant Permit Modification	Continuous	Management of change process	IV.I.2	Facility-Wide	Rule 3.8 § 402.3
Minor Permit Modification	Continuous	Management of change process	IV.I.3	Facility-Wide	Rule 3.8 § 402.4
Permit Reopening	Continuous	Permit was not reopened during this reporting period.	IV.J.1	Facility-Wide	Rule 3.8 § 413.1
Recordkeeping	Continuous	Records retained on site	IV.K.1	Facility-Wide	District Rule 3.8 § 302.6a
5 Year Record Retention	Continuous	Records retained on site	IV.K.2	Facility-Wide	District Rule 3.8 § 302.6b
Deviation Reporting	Continuous	Plant procedures, breakdown reports. Reports submitted for 12/21/21, 12/22/21, 12/27/21 and 12/29/21 breakdowns. Deviation report submitted for RATA and Q4 offsets.	IV.L.1	Facility-Wide	Rule 3.8 § 302.7a
Monitoring Report	Continuous	Semi-annual Compliance Certification	IV.L.2	Facility-Wide	Rule 3.8 § 302.7b
Reports of Deviation	Continuous	AQMD Breakdown reports provide cause and corrective action information.	IV.L.3	Facility-Wide	Rule 3.8 § 302.7c
Report Certification	Continuous	Reports are certified by Responsible Official	IV.L.4	Facility-Wide	Rule 3.8 § 302.7e



Mr. Hernan Lopez-Aguilar
Yolo-Solano Air Quality Management District
1947 Galileo Court, Suite 103
Davis, CA 95616

RE: *Woodland Biomass Power, LLC – Permit No. P-105-90(t)*
Boiler MACT Semi-Annual Compliance Report

Dear Mr. Lopez-Aguilar,

Woodland Biomass Power, LLC (WBP) is submitting the semi-annual compliance report as required by 40 CFR Part 63 Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers and Process Heaters. WBP operates one boiler that is subject to 40 CFR 63 Subpart DDDDD. The following information is required for the semi-annual compliance report related to the boiler, which demonstrates compliance through performance testing.

63.7550(c)(5)(i):

Woodland Biomass Power, LLC
1786 E. Kentucky Ave.
Woodland, CA 95776

63.7550(c)(5)(ii):

Table 1. MPCC Process Unit Information

Emission Unit ID	Emission Unit Description	Rated Heat Input Capacity (mmbtu/hr)	Fuels Used	Emission Limits	Operating Parameter Limitations
P-105-90(t)	Biomass/NG Circulating Fluidized Bed (CFB) Combustor	330 MMBtu/hr	Biomass Natural Gas	See Below	See Below

Table 2. CFB Performance Test Result Summary

Pollutant	Emission Limit	Performance Test Result	Meets Emission Limit?
Filterable PM*	0.11 lb/MMBtu	1.7E-03 lb/MMBtu	Yes
HCl†	2.2E-02 lb/MMBtu	3.6E-03 lb/MMBtu	Yes
Hg†	5.7E-06 lb/MMBtu	3.4E-07 lb/MMBtu	Yes

Table 3. CFB Operating Parameters

Operating Parameter	Parameter Limit	Averaging Period
Steam Flow	312,510 lb/hr	30-day rolling average
SO2	0.9 lb/hr	30-day rolling average
Opacity	<10%	Daily Block Average
CO	310ppmvd@3%O2	30-day rolling average

63.7550(c)(5)(iii):

Compliance Period: July 1, 2022 through December 31, 2022.

63.7550(c)(5)(v):

Table 4. CMS Information

Pollutant	Manufacturer	Model	Date of Last CMS Cert or Audit
CO	Thermo Environmental	48i	12/6/2022
Opacity	Durag	D-2 290AW	12/6/2022
O2	Thermox	WDG	12/6/2022
SO2	Thermo Environmental	43i	12/6/2022

63.7550(c)(5)(vi):

Table 5. CFB Fuel Inputs

Fuel Type	Fuel Determination	Amount Used
Natural Gas	NA	5520.0 Mscf
Woody Biomass	40 CFR 241.2 and 241.4	89,611 tons

The fuels combusted in the CFB were reviewed and meet the definitions of traditional fuels, clean cellulosic biomass, or identified as a fuel in the NSHM Rule.

Natural gas is a fossil fuel that clearly meets the NHSM 40 CFR 241.2 definition of traditional fuels.

Green wood is listed both in the *traditional fuels* and the *clean cellulosic biomass* definition.

Pallets qualify as *clean cellulosic biomass* as long as they are from untreated wood.

63.7550(c)(5)(vii):

The most recent performance test was conducted on December 6-7, 2022. The results of the testing will be submitted to YSAQMD and EPA's CEDRI platform upon receipt. There have been no operational changes since the last performance test that would increase emissions.

63.7550(c)(5)(viii):

There have been no new fuels combusted in the CFB since the last performance test.

63.7550(c)(5)(ix):

There have been no new fuels combusted in the CFB since the last performance test.

63.7550(c)(5)(xi):

There were no deviations from the emission limits or the operating limits identified above in Table 3 during this reporting period.

63.7550(c)(5)(xii):

Periods during which the CMS were out of control during the reporting period have been reported during the quarterly emissions reports for Q3 and Q4 2022.

63.7550(c)(5)(xiii):

There were no malfunctions of the boilers, air pollution control or monitoring systems during the reporting period.

63.7550(c)(5)(xv):

WBP does not demonstrate compliance by emission averaging.

63.7550(c)(5)(xvi):

30 day rolling averages for CO are under the limit of 310ppm.

63.7550(c)(5)(xvii):

See below for the certification statement.

63.7550(c)(5)(xviii):

Off-Line Date/Time	On-Line Date/Time	Hours Off-Line	Actions to Minimize Emissions	Corrective Actions to Restore to Normal Operations
9/5/2022 21:00	9/8/2022 07:00	58:00	Turbine trip, all control equipment operating properly	Repaired tube leaks
10/25/2022 01:00	11/20/2022 19:00	643:00	Scheduled outage, controlled shutdown	None, scheduled outage.
12/6/2022 08:00	12/8/2022 19:45	43:05	Turbine trip, all control equipment operating properly	Repaired tube leak and classifier

All records required by the monitoring plan during startups and shutdowns are kept on site.

If you have any questions, please feel free to contact Mary Nydam at (734) 740-8152, mary.nydham@dteenergy.com or Dionisio Araza at (510) 396-3529, Dionisio.Araza@dteenergy.com.

As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate and complete.

Sincerely,



Justin Crook
Regional Operations Manager,
Woodland Biomass Power, LLC.

Attachments

cc: USEPA – Electronic submittal via CEDRI
Scott Klipa, DTE Energy Resources (electronic only)

Monthly Emissions & Operations Report

Day	Avg CO ppm
7/1/2022	7.42
7/2/2022	16.21
7/3/2022	8.39
7/4/2022	13.55
7/5/2022	21.6
7/6/2022	19.09
7/7/2022	24.5
7/8/2022	18.3
7/9/2022	17.63
7/10/2022	26.39
7/11/2022	30.11
7/12/2022	26.06
7/13/2022	35.93
7/14/2022	33.81
7/15/2022	39.22
7/16/2022	22.8
7/17/2022	22.63
7/18/2022	18.12
7/19/2022	19.76
7/20/2022	22.49
7/21/2022	15.1
7/22/2022	22.2
7/23/2022	18.16
7/24/2022	12.86
7/25/2022	33.09
7/26/2022	40.49
7/27/2022	37.31
7/28/2022	24.82
7/29/2022	27.98
7/30/2022	24.16
7/31/2022	26.76
8/1/2022	21.71
8/2/2022	24.06
8/3/2022	24
8/4/2022	22.96
8/5/2022	25.05
8/6/2022	18.76
8/7/2022	19.2
8/8/2022	17.07
8/9/2022	26.58
8/10/2022	23.62
8/11/2022	20.5
8/12/2022	23.91
8/13/2022	25.96
8/14/2022	27.64
8/15/2022	31.57
8/16/2022	30.19
8/17/2022	24.97
8/18/2022	28.77
8/19/2022	34.52
8/20/2022	37.36
8/21/2022	39.03
8/22/2022	38.04
8/23/2022	32.11
8/24/2022	27.95
8/25/2022	29.42
8/26/2022	22.09
8/27/2022	23.06
8/28/2022	25.43
8/29/2022	17.02
8/30/2022	18.4
8/31/2022	21.06
9/1/2022	22.18
9/2/2022	31.65
9/3/2022	24.9
9/4/2022	25.47
9/5/2022	31.61

9/6/2022	1.58
9/7/2022	2.15
9/8/2022	43.51
9/9/2022	76.4
9/10/2022	58.65
9/11/2022	54.51
9/12/2022	28.68
9/13/2022	24.16
9/14/2022	21.48
9/15/2022	23.49
9/16/2022	27.43
9/17/2022	24.03
9/18/2022	24.38
9/19/2022	39.28
9/20/2022	38.25
9/21/2022	30.93
9/22/2022	23.82
9/23/2022	32.56
9/24/2022	34.74
9/25/2022	23.1
9/26/2022	26.06
9/27/2022	42.85
9/28/2022	27.68
9/29/2022	27.71
9/30/2022	15.11
10/1/2022	20.83
10/2/2022	10.64
10/3/2022	21.84
10/4/2022	28.84
10/5/2022	28.43
10/6/2022	26.41
10/7/2022	32.03
10/8/2022	23.11
10/9/2022	25.46
10/10/2022	33.2
10/11/2022	37.4
10/12/2022	39.7
10/13/2022	33.12
10/14/2022	49.19
10/15/2022	37.08
10/16/2022	26.38
10/17/2022	32.07
10/18/2022	28.3
10/19/2022	40.72
10/20/2022	25.14
10/21/2022	23.36
10/22/2022	16.08
10/23/2022	13.18
10/24/2022	9.75
10/25/2022	3.9
10/26/2022	4.03
10/27/2022	4.08
10/28/2022	4.35
10/29/2022	4.47
10/30/2022	Down
10/31/2022	Down
11/1/2022	Down
11/2/2022	Down
11/3/2022	Down
11/4/2022	Down
11/5/2022	Down
11/6/2022	Down
11/7/2022	Down
11/8/2022	Down
11/9/2022	Down
11/10/2022	Down
11/11/2022	Down
11/12/2022	Down
11/13/2022	0.3
11/14/2022	Down

11/15/2022	0.9
11/16/2022	0.8
11/17/2022 Maint	
11/18/2022	0.2
11/19/2022	3.3
11/20/2022	9.2
11/21/2022	5
11/22/2022	8.5
11/23/2022	8.1
11/24/2022	10.2
11/25/2022	3.6
11/26/2022	5.4
11/27/2022	8.9
11/28/2022	13.4
11/29/2022	8.9
11/30/2022	12.1
12/1/2022	7.8
12/2/2022	3.9
12/3/2022	5
12/4/2022	13
12/5/2022	13.9
12/6/2022	7.3
12/7/2022	0.1
12/8/2022	18.2
12/9/2022	14.6
12/10/2022	34.7
12/11/2022	15.4
12/12/2022	16.6
12/13/2022	10.9
12/14/2022	11.7
12/15/2022	12
12/16/2022	8.8
12/17/2022	14.2
12/18/2022	9.6
12/19/2022	13.1
12/20/2022	17.9
12/21/2022	12.9
12/22/2022	24.3
12/23/2022	15.5
12/24/2022	10.4
12/25/2022	7.9
12/26/2022	15.5
12/27/2022	17.5
12/28/2022	13.3
12/29/2022	19.2
12/30/2022	34.8
12/31/2022	63.1

DEVIATION REPORT (FORM 3.8-L)

DISTRICT: Yolo-Solano Air Quality Management District	▸ DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME: Woodland Biomass Power LLC	FACILITY NAME: Woodland Biomass Power LLC

I. DEVIATION INFORMATION

1. Permit number(s) of emission unit or control unit affected: P-105-90(t)

2. Description of deviation: Failed Source test results for PM10

3. Description and identification of permit condition(s) deviated: #25. Permit holder shall operate boiler such that exhaust stack emissions are less than 7.2 lb/hr PM10, as determined by the average of three one-hour source test.

4. Associated equipment and equipment operation (if any): N/A

5. Date and time when deviation was discovered: Draft source test result was received on 2/1/2023

6. Date, time and duration of deviation: Source test was conducted on 12/16/2022

7. Probable cause of deviation: Under investigation

8. Preventive or corrective action taken: Under investigation

DEVIATION REPORT (FORM 3.8-L)

DISTRICT: Yolo-Solano Air Quality Management District	► DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME: Woodland Biomass Power, Ltd.	FACILITY NAME: Woodland Biomass Power, LTD.

I. DEVIATION INFORMATION

1. Permit number(s) of emission unit or control unit affected: P-105-90(t) II.C.7

2. Description of deviation: Late submission of source test plan

3. Description and identification of permit condition(s) deviated: _____
C. 7 For the boiler (P-105-90(t)), the District must be notified prior to any compliance source test, and a source test plan must be submitted for approval 30 days prior to testing.

4. Associated equipment and equipment operation (if any): Boiler and Baghouse

5. Date and time when deviation was discovered: 3/01/23 at 7:00 AM

6. Date, time and duration of deviation: _____

7. Probable cause of deviation: Source Testing re-test has to do be done ASAP.

8. Preventive or corrective action taken: None

DEVIATION REPORT (FORM 3.8-L)

DISTRICT: Yolo-Solano Air Quality Management District	► DISTRICT USE ONLY ◀ DISTRICT ID:
COMPANY NAME: Woodland Biomass Power LLC	FACILITY NAME: Woodland Biomass Power LLC

I. DEVIATION INFORMATION

1. Permit number(s) of emission unit or control unit affected: P-105-90(t)
2. Description of deviation: Exceedance of PM10 daily, quarterly limits for Q4, and annual limits for 2022
3. Description and identification of permit condition(s) deviated: A.6 The PM10 emissions from the boiler (P-105-90(t)) shall not exceed 172.8 lb/day, 15,552 lb/1st calendar quarter, 15,725 lb/2nd calendar quarter, 15,898 lb/3rd calendar quarter, 15,898 lb/4th calendar quarter [16426 lb/4th Qtr], and 27.00 tons/year [29.04 tons/year] . [District Rule 3.4, §409.I/C-00-19]
4. Associated equipment and equipment operation (if any): N/A
5. Date and time when deviation was discovered: 3/23/23, while reviewing the 2022 Annual throughput data for P-105-90(t)
6. Date, time and duration of deviation: Daily: 12/16/22-12/31/22; Quarter 4: Oct-Dec 2022; Annual: 2022
7. Probable cause of deviation: Failed source test for PM10 on 12/16/22. Possible incorrect stack flows measured, yielding higher results. Total PM calculated instead of what was required.
8. Preventive or corrective action taken: Re-test for PM10 on 03/07/23. Preliminary results indicate a Pass result.

**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.
Braun Blaising Smith Wynne, P.C.
California Community Choice Association
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
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
Downey Brand LLP
Dish Wireless L.L.C.

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

GenOn Energy, Inc.
Green Power Institute
Hanna & Morton
ICF

iCommLaw
International Power Technology
Intertie

Intestate Gas Services, Inc.

Johnston, Kevin
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
McClintock IP
McKenzie & Associates

Modesto Irrigation District
NLine Energy, Inc.
NRG Solar

OnGrid Solar
Pacific Gas and Electric Company
Peninsula Clean Energy

Pioneer Community Energy

Public Advocates Office

Redwood Coast Energy Authority
Regulatory & Cogeneration Service, Inc.

Resource Innovations

SCD Energy Solutions
San Diego Gas & Electric Company

SPURR
San Francisco Water Power and Sewer
Sempra Utilities

Sierra Telephone Company, Inc.
Southern California Edison Company
Southern California Gas Company
Spark Energy
Sun Light & Power
Sunshine Design
Stoel Rives LLP

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