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BAY AREA AIR QUALITY MANAGEMENT DISTRICT

Silicon Valley Power
City of Santa Clara
1500 Warburton Ave.
Santa Clara, CA 95050

LETTER OF TRANSMITTAL

TO: Director of Compliance and Enforcement
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

DATE: 3/13/2020

ATTN: Title V Reports 415-771-6000

SUBJECT: Silicon Valley Power Cogen Title V Reports
BAAQMD Plant No. 621, permit to Operate Condition #14194 (S-1, 2, 3 & 4).

We are sending you the following:

X	Attached Report		Separate Cover
	Drawing Originals		Drawing Prints
	Materials described below		Specifications

Quantity	Identification Number	Rev.	Description
1	Sept. '19 to Feb. '20	0	Semi-annual Monitoring Report
1	Mar. '19 to Feb. '20	0	Annual Compliance Certification

These are transmitted:

X In accordance with Permit to Operate Condition # 14194

26 No. of pages including this letter of transmittal

Remarks: A copy of this report has been sent to the Director of the Air Division at USEPA Region IX. The report has been certified by the Responsible Official as true, accurate and complete.

Signed:

Monica Nguyen
Resource Analyst

March 13, 2020

SILICON VALLEY POWER
CITY OF SANTA CLARA

Powering The Center of What's Possible

To: Bay Area Air Quality Management District
Director of Compliance and Enforcement
375 Beale Street, Suite 600
San Francisco, CA 94105

Attn: Title V Reports

Subject: Title V Semi-annual Monitoring and Annual Compliance Certification for City of Santa Clara, Silicon Valley Power (SVP) Cogeneration Plant, BAAQMD Plant No. A0621, Permit to Operate Condition 14194 (S-1, 2, 3, 4)

The City of Santa Clara Electric Department is submitting two reports in accordance with the Major Facility Review Permit Section I (Standard Conditions), Clause F (Monitoring Reports), and the Permit to Operate Condition 14194.

The permit requires a semi-annual reporting of operational hours and a reporting of specific events of non-compliance. During the period **September 1, 2019** through **February 29, 2020**, SVP completed all the required monitoring. There were no instances of non-compliance during this period.

Also required is an Annual Compliance Certification Report for the period **March 01, 2019** through **February 29, 2020**. During this period, there was one instance of non-compliance.

The attached forms provide data that details the compliance items.

I certify to the best of my knowledge that the statements and information contained in this report are true, accurate, and complete. A copy of this report has been sent to the Director of the Air Division, USEPA, Region IX.

Respectfully,

Kevin Kolnowski
Name of Responsible Official

Signature

Chief Electric Operating Officer
Title of Responsible Official

3/13/20
Date

Facility #A0621
City of Santa Clara,
Silicon Valley Power
Cogeneration Plant
524 Robert Avenue
Santa Clara, CA 95050

1500 Warburton Avenue • Santa Clara, CA 95050 • 408-615-6600 • Fax 408-249-0217 • www.siliconvalleypower.com

Compliance Certification Report

3/13/2020 **Site#:** A0621

Site#: A0621 **Site name:** Santa Clara Cogeneration Plant #1 **Period:** 03/01/19 **to** 02/29/20

Address: 524 Robert Avenue **City:** Santa Clara **State:** CA **Zip:** 95050

Source#: 01 **Source name:** Turbine

Citation	Title	Compliance	Cont or Int	Days Out of Compliance/Comments
01-107	Combination of Emissions	Y	C	
01-523	Parametric Monitoring and Recordkeeping Procedures	Y	C	
01-523.01	Reporting requirement for periods of inoperation >24 hours	Y	C	
01-523.02	Limit on duration of inoperation	Y	C	
01-523.03	Reporting requirement for violations of any applicable limits	Y	C	
01-523.04	Records of inoperation, tests, calibrations, adjustments, & maintenance	Y	C	
01-523.05	Maintenance and Calibration	Y	C	
06-301	Ringelmann No. 1 Limitation	Y	C	
06-305	Visible Particles	Y	C	
06-310.03	Particulate Weight Limitation, Heat Transfer Operation	Y	C	
09-01-301	Limitations on Ground Level Concentrations	Y	C	
09-01-302	General Emission Limitations	Y	C	
09-09-113	Exemption-Inspection/Maintenance	Y	C	

Compliance Certification Report (Addendum)

3/13/2020 **Site#:** A0621

Citation	Title	Compliance	Cont or Int	Days Out of Compliance/Comments
09-09-114	Exemption – Start-Up/Shutdown	Y	C	
09-09-301.01	Emission Limits – Turbines below 10.0 MW	Y	C	
40 CFR 060.007	Notification and Record Keeping	Y	C	
40 CFR 060.008	Performance Tests	Y	C	
40 CFR 060.009	Availability of Information	Y	C	
40 CFR 060.011	Compliance with standards and maintenance requirements	Y	C	
40 CFR 060.012	Circumvention	Y	C	
40 CFR 060.013	Monitoring Requirements	Y	C	
40 CFR 060.013(a)	Applicability of monitoring section	Y	C	
40 CFR 060.013(b)	Installation of monitoring system prior to tests	Y	C	
40 CFR 060.013(e)	Continuous operation	Y	C	
40 CFR 060.013(f)	Representative measurements	Y	C	
40 CFR 060.332	Standard for Nitrogen Oxides	Y	C	
40 CFR 060.332(a)(2)	NOx Limit	N	I	• 3/14/2019 01:18 to 3/14/2019 01:27
40 CFR 060.333	Performance Standards, SO2	Y	C	
40 CFR 060.333(a)	Sulfur Dioxide Emission Standard	Y	C	
40 CFR 060.333(b)	Fuel Sulfur Content Limit	Y	C	

Compliance Certification Report (Addendum)

3/13/2020 **Site#:** A0621

Citation	Title	Compliance	Cont or Int	Days Out of Compliance/Comments
40 CFR 060.334	Monitoring of Operations	Y	C	
40 CFR 060.334(a)	Monitoring of water/steam fuel ratio	Y	C	
40 CFR 060.334(g)	Monitoring of steam or water to fuel ratio during performance testing	Y	C	
40 CFR 060.334(h)(3)	Fire only natural gas in lieu of fuel sulfur content monitoring	Y	C	
40 CFR 060.334(j)	Report any excess of a monitored parameter and all monitor down	Y	C	
40 CFR 060.334(j)(1)(I)	Requirement for Turbines using water/steam to fuel ratio monitoring	Y	C	
40 CFR 060.334(j)(5)	Deadline for Excess Emission Reports	Y	C	
Cond# 14194, part 01	Fuel Requirement	Y	C	
Cond# 14194, part 02	Heat Input Limit – Turbines	Y	C	
Cond# 14194, part 03	Heat Input Limit – Duct Burners	Y	C	
Cond# 14194, part 04	NOx Emissions Limit – Turbines	N	I	• 3/14/2019 01:18 to 3/14/2019 01:27
Cond# 14194, part 05	NOx Emissions Limit – Combined Turbine/Duct Burners	Y	C	
Cond# 14194, part 06	Water Injection System Requirements	N	I	• 3/14/2019 01:18 to 3/14/2019 01:27
Cond# 14194, part 07	Fuel Monitoring Requirement	Y	C	
Cond# 14194, part 08	Continuous Monitoring System	Y	C	
Cond# 14194, part 09	Annual Source Test Requirement	Y	C	
Cond# 14194, part 10	Recordkeeping	Y	C	
Cond# 14194, part 11	Reporting	Y	C	
SIP 01-523	Parametric Monitoring and Recordkeeping Procedures	Y	C	
SIP 01-523.03	Reports of Violations	Y	C	

Compliance Certification Report (Addendum)

3/13/2020 **Site#:** A0621

Site#: A0621 **Site name:** Santa Clara Cogeneration Plant #1 **Period:** 03/01/19 **to** 02/29/20

Address: 524 Robert Avenue **City:** Santa Clara **State:** CA **Zip:** 95050

Source#: 02 **Source name:** Turbine

Citation	Title	Compliance	Cont or Int	Days Out of Compliance/Comments
01-107	Combination of Emissions	Y	C	
01-523	Parametric Monitoring and Recordkeeping Procedures	Y	C	
01-523.01	Reporting requirement for periods of inoperation >24 hours	Y	C	
01-523.02	Limit on duration of inoperation	Y	C	
01-523.03	Reporting requirement for violations of any applicable limits	Y	C	
01-523.04	Records of inoperation, tests, calibrations, adjustments, & maintenance	Y	C	
01-523.05	Maintenance and Calibration	Y	C	
06-301	Ringelmann No. 1 Limitation	Y	C	
06-305	Visible Particles	Y	C	
06-310.03	Particulate Weight Limitation, Heat Transfer Operation	Y	C	
09-01-301	Limitations on Ground Level Concentrations	Y	C	
09-01-302	General Emission Limitations	Y	C	
09-09-113	Exemption-Inspection/Maintenance	Y	C	

Compliance Certification Report (Addendum)

3/13/2020 **Site#:** A0621

Citation	Title	Compliance	Cont or Int	Days Out of Compliance/Comments
09-09-114	Exemption – Start-Up/Shutdown	Y	C	
09-09-301.01	Emission Limits – Turbines below 10.0 MW	Y	C	
40 CFR 060.007	Notification and Record Keeping	Y	C	
40 CFR 060.008	Performance Tests	Y	C	
40 CFR 060.009	Availability of Information	Y	C	
40 CFR 060.011	Compliance with standards and maintenance requirements	Y	C	
40 CFR 060.012	Circumvention	Y	C	
40 CFR 060.013	Monitoring Requirements	Y	C	
40 CFR 060.013(a)	Applicability of monitoring section	Y	C	
40 CFR 060.013(b)	Installation of monitoring system prior to tests	Y	C	
40 CFR 060.013(e)	Continuous operation	Y	C	
40 CFR 060.013(f)	Representative measurements	Y	C	
40 CFR 060.332	Standard for Nitrogen Oxides	Y	C	
40 CFR 060.332(a)(2)	NOx Limit	N	I	• 3/14/2019 01:18 to 3/14/2019 01:22
40 CFR 060.333	Performance Standards, SO2	Y	C	
40 CFR 060.333(a)	Sulfur Dioxide Emission Standard	Y	C	
40 CFR 060.333(b)	Fuel Sulfur Content Limit	Y	C	

Compliance Certification Report (Addendum)

3/13/2020 **Site#:** A0621

Citation	Title	Compliance	Cont or Int	Days Out of Compliance/Comments
40 CFR 060.334	Monitoring of Operations	Y	C	
40 CFR 060.334(a)	Monitoring of water/steam fuel ratio	Y	C	
40 CFR 060.334(g)	Monitoring of steam or water to fuel ratio during performance testing	Y	C	
40 CFR 060.334(h)(3)	Fire only natural gas in lieu of fuel sulfur content monitoring	Y	C	
40 CFR 060.334(j)	Report any excess of a monitored parameter and all monitor down	Y	C	
40 CFR 060.334(j)(1)(I)	Requirement for Turbines using water/steam to fuel ratio monitoring	Y	C	
40 CFR 060.334(j)(5)	Deadline for Excess Emission Reports	Y	C	
Cond# 14194, part 01	Fuel Requirement	Y	C	
Cond# 14194, part 02	Heat Input Limit – Turbines	Y	C	
Cond# 14194, part 03	Heat Input Limit – Duct Burners	Y	C	
Cond# 14194, part 04	NOx Emissions Limit – Turbines	N	I	• 3/14/2019 01:18 to 3/14/2019 01:22
Cond# 14194, part 05	NOx Emissions Limit – Combined Turbine/Duct Burners	Y	C	
Cond# 14194, part 06	Water Injection System Requirements	N	I	• 3/14/2019 01:18 to 3/14/2019 01:22
Cond# 14194, part 07	Fuel Monitoring Requirement	Y	C	
Cond# 14194, part 08	Continuous Monitoring System Requirement	Y	C	
Cond# 14194, part 09	Annual Source Test Requirement	Y	C	
Cond# 14194, part 10	Recordkeeping	Y	C	
Cond# 14194, part 11	Reporting	Y	C	
SIP 01-523	Parametric Monitoring and Recordkeeping Procedures	Y	C	
SIP 01-523.03	Reports of Violations	Y	C	

Compliance Certification Report (Addendum)

3/13/2020 **Site#:** A0621

Site#: A0621 **Site name:** Santa Clara Cogeneration Plant #1 **Period:** 03/01/19 **to** 02/29/20

Address: 524 Robert Avenue **City:** Santa Clara **State:** CA **Zip:** 95050

Source#: 03 **Source name:** Duct Burner

Citation	Title	Compliance	Cont or Int	Days Out of Compliance/Comments
01-107	Combination of Emissions	Y	C	
01-523	Parametric Monitoring and Recordkeeping Procedures	Y	C	
01-523.01	Reporting requirement for periods of inoperation >24 hours	Y	C	
01-523.02	Limit on duration of inoperation	Y	C	
01-523.03	Reporting requirement for violations of any applicable limits	Y	C	
01-523.04	Records of inoperation, tests, calibrations, adjustments, & maintenance	Y	C	
01-523.05	Maintenance and Calibration	Y	C	
06-301	Ringelmann No. 1 Limitation	Y	C	
06-305	Visible Particles	Y	C	
06-310.03	Particulate Weight Limitation, Heat Transfer Operation	Y	C	
06-401	Appearance of Emissions	Y	C	Section 06-301 regulates this source. Therefore, this source is exempted from 06-401.
09-01-301	Limitations on Ground Level Concentrations	Y	C	
09-01-302	General Emission Limitations	Y	C	

Compliance Certification Report (Addendum)

3/13/2020 **Site#:** A0621

Citation	Title	Compliance	Cont or Int	Days Out of Compliance/Comments
09-09-301.01	Emission Limits – Turbines below 10.0 MW	Y	C	
40 CFR 060.007	Notification and Record Keeping	Y	C	
40 CFR 060.008	Performance Tests	Y	C	
40 CFR 060.009	Availability of Information	Y	C	
40 CFR 060.011	Compliance with standards and maintenance requirements	Y	C	
40 CFR 060.012	Circumvention	Y	C	
40 CFR 060.013	Monitoring Requirements	Y	C	
40 CFR 060.013(a)	Applicability of monitoring section	Y	C	
40 CFR 060.013(b)	Installation of monitoring system prior to tests	Y	C	
40 CFR 060.013(e)	Continuous operation	Y	C	
40 CFR 060.013(f)	Representative measurements	Y	C	
40 CFR 060.332	Standard for Nitrogen Oxides	Y	C	
40 CFR 060.332(a)(2)	NOx Limit	Y	C	
40 CFR 060.333	Performance Standards, SO2	Y	C	
40 CFR 060.333(a)	Sulfur Dioxide Emission Standard	Y	C	
40 CFR 060.333(b)	Fuel Sulfur Content Limit	Y	C	

Compliance Certification Report (Addendum)

3/13/2020 **Site#:** A0621

Citation	Title	Compliance	Cont or Int	Days Out of Compliance/Comments
40 CFR 060.334	Monitoring of Operations	Y	C	
40 CFR 060.334(a)	Monitoring of water/steam fuel ratio	Y	C	
40 CFR 060.334(g)	Monitoring of steam or water to fuel ratio during performance testing	Y	C	
40 CFR 060.334(h)(3)	Fire only natural gas in lieu of fuel sulfur content monitoring	Y	C	
40 CFR 060.334(j)	Report any excess of a monitored parameter and all monitor down	Y	C	
40 CFR 060.334(j)(1)(I)	Requirement for Turbines using water/steam to fuel ratio monitoring	Y	C	
40 CFR 060.334(j)(5)	Deadline for Excess Emission Reports	Y	C	
Cond# 14194, part 01	Fuel Requirement	Y	C	
Cond# 14194, part 02	Heat Input Limit – Turbines	Y	C	
Cond# 14194, part 03	Heat Input Limit – Duct Burners	Y	C	
Cond# 14194, part 04	NOx Emissions Limit – Turbines	Y	C	
Cond# 14194, part 05	NOx Emissions Limit – Combined Turbine/Duct Burners	Y	C	
Cond# 14194, part 06	Water Injection System Requirements	Y	C	
Cond# 14194, part 07	Fuel Monitoring Requirement	Y	C	
Cond# 14194, part 08	Continuous Monitoring System Requirement	Y	C	
Cond# 14194, part 09	Annual Source Test Requirement	Y	C	
Cond# 14194, part 10	Recordkeeping	Y	C	
Cond# 14194, part 11	Reporting	Y	C	
SIP 01-523	Parametric Monitoring and Recordkeeping Procedures	Y	C	
SIP 01-523.03	Reports of Violations	Y	C	

Compliance Certification Report (Addendum)

3/13/2020 **Site#:** A0621

Site#: A0621 **Site name:** Santa Clara Cogeneration Plant #1 **Period:** 03/01/18 **to** 02/28/19

Address: 524 Robert Avenue **City:** Santa Clara **State:** CA **Zip:** 95050

Source#: 04 **Source name:** Duct Burner

Citation	Title	Compliance	Cont or Int	Days Out of Compliance/Comments
01-107	Combination of Emissions	Y	C	
01-523	Parametric Monitoring and Recordkeeping Procedures	Y	C	
01-523.01	Reporting requirement for periods of inoperation >24 hours	Y	C	
01-523.02	Limit on duration of inoperation	Y	C	
01-523.03	Reporting requirement for violations of any applicable limits	Y	C	
01-523.04	Records of inoperation, tests, calibrations, adjustments, & maintenance	Y	C	
01-523.05	Maintenance and Calibration	Y	C	
06-301	Ringelmann No. 1 Limitation	Y	C	
06-305	Visible Particles	Y	C	
06-310.03	Particulate Weight Limitation, Heat Transfer Operation	Y	C	
06-401	Appearance of Emissions	Y	C	Section 06-301 regulates this source. Therefore, this source is exempted from 06-401.
09-01-301	Limitations on Ground Level Concetrations	Y	C	
09-01-302	General Emission Limitations	Y	C	
09-09-113	Exemption-Inspection/Maintenance	Y	C	

Compliance Certification Report (Addendum)

3/13/2020 **Site#:** A0621

Citation	Title	Compliance	Cont or Int	Days Out of Compliance/Comments
09-09-114	Exemption – Start-Up/Shutdown	Y	C	
09-09-301.01	Emission Limits – Turbines below 10.0 MW	Y	C	
40 CFR 060.007	Notification and Record Keeping	Y	C	
40 CFR 060.008	Performance Tests	Y	C	
40 CFR 060.009	Availability of Information	Y	C	
40 CFR 060.011	Compliance with standards and maintenance requirements	Y	C	
40 CFR 060.012	Circumvention	Y	C	
40 CFR 060.013	Monitoring Requirements	Y	C	
40 CFR 060.013(a)	Applicability of monitoring section	Y	C	
40 CFR 060.013(b)	Installation of monitoring system prior to tests	Y	C	
40 CFR 060.013(e)	Continuous operation	Y	C	
40 CFR 060.013(f)	Representative measurements	Y	C	
40 CFR 060.332	Standard for Nitrogen Oxides	Y	C	
40 CFR 060.332(a)(2)	NOx Limit	Y	C	
40 CFR 060.333	Performance Standards, SO2	Y	C	
40 CFR 060.333(a)	Sulfur Dioxide Emission Standard	Y	C	
40 CFR 060.333(b)	Fuel Sulfur Content Limit	Y	C	

Compliance Certification Report (Addendum)

3/13/2020 **Site#:** A0621

Citation	Title	Compliance	Cont or Int	Days Out of Compliance/Comments
40 CFR 060.334	Monitoring of Operations	Y	C	
40 CFR 060.334(a)	Monitoring of water/steam fuel ratio	Y	C	
40 CFR 060.334(g)	Monitoring of steam or water to fuel ratio during performance testing	Y	C	
40 CFR 060.334(h)(3)	Fire only natural gas in lieu of fuel sulfur content monitoring	Y	C	
40 CFR 060.334(j)	Report any excess of a monitored parameter and all monitor down	Y	C	
40 CFR 060.334(j)(1)(I)	Requirement for Turbines using water/steam to fuel ratio monitoring	Y	C	
40 CFR 060.334(j)(5)	Deadline for Excess Emission Reports	Y	C	
Cond# 14194, part 01	Fuel Requirement	Y	C	
Cond# 14194, part 02	Heat Input Limit – Turbines	Y	C	
Cond# 14194, part 03	Heat Input Limit – Duct Burners	Y	C	
Cond# 14194, part 04	NOx Emissions Limit – Turbines	Y	C	
Cond# 14194, part 05	NOx Emissions Limit – Combined Turbine/Duct Burners	Y	C	
Cond# 14194, part 06	Water Injection System Requirements	Y	C	
Cond# 14194, part 07	Fuel Monitoring Requirement	Y	C	
Cond# 14194, part 08	Continuous Monitoring System Requirement	Y	C	
Cond# 14194, part 09	Annual Source Test Requirement	Y	C	
Cond# 14194, part 10	Recordkeeping	Y	C	
Cond# 14194, part 11	Reporting	Y	C	
SIP 01-523	Parametric Monitoring and Recordkeeping Procedures	Y	C	
SIP 01-523.03	Reports of Violations	Y	C	

Compliance Certification Report (Addendum)

3/13/2020 **Site#:** A0621

Site#: A0621 **Site name:** Santa Clara Cogeneration Plant #1 **Period:** 03/01/18 **to** 02/28/19

Address: 524 Robert Avenue **City:** Santa Clara **State:** CA **Zip:** 95050

Source#: Facility **Source name:** Facility

Citation	Title	Compliance	Cont or Int	Days Out of Compliance/Comments
02-01-429	Federal emissions Statement	Y	C	
40 CFR Part 61, Subpart A	NESHAP – General Provisions	Y	C	
AB 2588	California Assembly Bill 2588 Toxics "Hot Spots"	Y	C	
Portable Equipment	California Health and Safety Code Section 41750 et seq.	Y	C	
Regulation 01	General Provisions and Definitions	Y	C	
Regulation 02, Rule 01	Permits, General Requirements	Y	C	
Regulation 04	Air Pollution Episode Plan	Y	C	
Regulation 05	Open Burning	N/A	N/A	
Regulation 06	Particulate Matter and Visible Emissions	Y	C	
Regulation 07	Odorous Substances	Y	C	
Regulation 08, Rule 01	Organic Compounds – General Provisions	Y	C	
Regulation 08, Rule 02	Org Compounds – Misc. Operations	Y	C	Regulation 8-2-110 provides a Natural Gas Exemption
Regulation 08, Rule 03	Org Compounds – Architectural Coatings	Y	C	

Compliance Certification Report (Addendum)

3/13/2020 **Site#:** A0621

Citation	Title	Compliance	Cont or Int	Days Out of Compliance/Comments
Regulation 08, Rule 16	Org Compounds – Solvent Cleaning Operations	Y	C	
Regulation 08, Rule 40	Aeration of Contaminated Soil and Removal of Underground Storage	N/A	N/A	
Regulation 08, Rule 47	Organic Compounds – Air Stripping and Soil Vapor Extraction	N/A	N/A	
Regulation 08, Rule 49	Org. Compounds – Aerosol Paint Products	Y	C	
Regulation 08, Rule 51	Org. Compounds – Adhesive and Sealant Products	Y	C	
Regulation 11, Rule 01	Lead	N/A	N/A	
Regulation 11, Rule 02	Asbestos Demolition, Renovation, etc.	N/A	N/A	
Regulation 12, Rule 04	Sandblasting	N/A	N/A	
SIP Regulation 01	General Provisions and Definitions	Y	C	
SIP Regulation 02, Rule 01	Permits, General Requirements	Y	C	
SIP Regulation 04	Air Pollution Episode Plan	Y	C	
SIP Regulation 05	Open Burning	N/A	N/A	
SIP Regulation 08, Rule 49	Org. Compounds – Aerosol Products	Y	C	
SIP Regulation 08, Rule 51	Adhesive and Sealant Products	Y	C	
SIP Regulation 11, Rule 01	Hazardous Pollutants – Lead	N/A	N/A	
SIP Regulation 12, Rule 04	Sandblasting	N/A	N/A	

Compliance Certification

Based on information and belief formed after reasonable inquiry, the statements and information in the attached Compliance Certification form are true, accurate, and complete.

Kevin Kolnowski
Name of Responsible Official

Signature

March 1, 2019 through February 29, 2020
Certification Period

3/13/20
Date

Facility #A0621
City of Santa Clara, Silicon Valley Power
524 Robert Avenue
Santa Clara, CA 95050

Title V Semi-Annual Monitoring Verification Report

Applicable Limits and Compliance Monitoring

This report summarizes the applicable source – specific emission limits for the Cogeneration Plant, facility #A0621. The following table shows the relationship between each emission limit and the associated compliance monitoring provisions, if any. The monitoring frequency indicates whether periodic (P) or continuous (C) monitoring is required. Also, for periodic monitoring, the frequency of the monitoring is shown: annual (A), quarterly (Q), monthly (M), weekly (W), daily (D), or on an event basis (E). No monitoring (N) is required if the current applicable rule or regulation does not require monitoring – where our facility's operation will not deviate from the applicable emission limit based upon the nature of its operation. The last two columns indicate our facility's compliance from **September 1, 2019** through **February 29, 2020**.

(Adapted from Table VII-A of the Major Facility Review Permit)
Applicable Limits and Compliance Monitoring Requirements
S1, S2-Gas Turbines w/Water Injection
S3, S4-Duct Burners

Type of limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Yes/No
PM	BAAQMD Regulation 6-1-301	N		Ringelmann 1.0		N		Yes *(1)*
PM	SIP Regulation 6-301	Y		Ringelmann 1.0		N		Yes *(1)*
FP	BAAQMD Regulation 6-1-310.3	N		0.15 gr/dscf @ 6% O_2		N		Yes *(1)*
FP	SIP Regulation 6-1-310.3	N		0.15 gr/dscf @ 6% O_2		N		Yes *(1)*
NOx	BAAQMD 9-9-301.1.1	N		42 ppmv @15% O_2 (dry)	Condition #14194, Part 9 and 10, BAAQMD 9-9-504	P/A	Source test	Yes *(1)*

(Adapted from Table VII-A of the Major Facility Review Permit)
Applicable Limits and Compliance Monitoring Requirements (continued)
S1, S2-Gas Turbines w/Water Injection
S3, S4-Duct Burners

Type of limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Yes/No
NOx	BAAQMD 9-9-301.1.1	N		42 ppmv @ 15% O_2 (dry)	Condition #14194, part 8	C	Water-to-fuel monitoring	Yes
NOx	BAAQMD 9-9-301.2	N		42 ppmv @ 15% O_2 (dry	Condition #14194, parts 9 and 10, BAAQMD 9-9-504	P/A	Source test	Yes
NOx	BAAQMD 9-9-301.2	N		42 ppmv @ 15% O_2 (dry)	Condition #14194, part 8	C	Water-to-fuel monitoring	Yes
NOx	BAAQMD 9-9-301.2	N	Up to 60 months after availa-bility of comer-cially available tech-nology	35 ppmv @15% O2 (dry)	Condition #14194, Parts 9 and 10, BAAQMD 9-9-504	P/A	Source test	N/A
NOx	BAAQMD 9-9-301.2	N	Up to 60 months after availa-bility of comer-cially available tech-nology	35 ppmv @15% O2 (dry)	Condition #14194, Part 8	C	Water-to-fuel monitoring	N/A

(Adapted from Table VII-A of the Major Facility Review Permit)
Applicable Limits and Compliance Monitoring Requirements (continued)
S1, S2-Gas Turbines w/Water Injection
S3, S4-Duct Burners

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Yes/No
NOx	SIP 9-9-301.1.1	Y		42 ppmv @ 15% O_2 (dry)	Condition #14194, parts 9 and 10	P/A	Source test	Yes
NOx	SIP 9-9-301.1.1	Y		42 ppmv @ 15% O_2 (dry)	Condition #14194, part 8	C	Water-to-fuel monitoring	Yes
	NSPS Subpart GG 60.332 (a)(2)	Y		150 ppmv @ 15% O_2 (dry)	NSPS Subpart GG 60.334(a)	C	Water-to-fuel monitoring	Yes *(1)*
NOx	Condition #14194, Part 4	Y		42 ppmv @ 15% O_2 (dry), each turbine (except during startup and shutdown)	Condition #14194, parts 9 and 10	P/A	Source test	Yes
NOx	Condition #14194, Part 4	Y		42 ppmv @ 15% O_2 (dry), each turbine (except during startup and shutdown)	Condition #14194, part 8	C	Water-to-fuel monitoring	Yes
NOx	Condition #14194, Part 5	Y		42 ppmv @ 15% O_2 (dry), each turbine /supplemental burner combination	Condition #14194, parts 9 and 10	P/A	Source test	Yes

(Adapted from Table VII-A of the Major Facility Review Permit)
Applicable Limits and Compliance Monitoring Requirements (continued)
S1, S2-Gas Turbines w/Water Injection
S3, S4-Duct Burners

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Yes/No
SO2	BAAQMD 9-1-301	Y		Ground level concentrations: 0.5 ppm for 3 Consecutive minutes, 0.25 ppm averaged over 60 consecutive minutes, 0.05 ppm averaged over 24 hours		N		Yes *(1)*
	BAAQMD 9-1-302	Y		300 ppm (dry) general emission limitation		N		Yes *(1)*
	40 CFR 60 Subpart GG 60.333 (b)	Y		0.8% (wt) fuel sulfur content	40 CFR 60 Subpart GG 60.334 (h)(3)	N	None	Yes *(1)*
Fuel Usage	BAAQMD Condition #14194 part 2	Y		55.1 MMBTU/hr heat input (each turbine)	BAAQMD Condition #14194 part 7	C	Continuous Fuel Usage Monitors	Yes
	BAAQMD Condition #14194 part 3	Y		13.5 MMBTU/hr Heat input (each duct burner)	BAAQMD Condition #14194 part 7	C	Continuous Fuel Usage Monitors	Yes
Water-to-Fuel Ratio	BAAQMD Condition #14194 part 6	Y		Water-to-Fuel Ratio: 57% to 62% (wt)	BAAQMD Condition #14194 part 7	C	Continuous Water-to-Fuel Monitoring	Yes

(Adapted from Table VII-A of the Major Facility Review Permit)
Applicable Limits and Compliance Monitoring Requirements (continued)
S1, S2-Gas Turbines w/Water Injection
S3, S4-Duct Burners

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Yes/No
Periods of Inoperation for Para-metric Monitors	BAAQMD 1-523.2	Y		15 consecutive days/incident and 30 calendar days/12 month period	BAAQMD 1-523.4	P/D	Operating Records for All Parametric Monitors	Yes

(1) This facility uses PUC pipeline quality natural gas. Enforceable limits are "subsumed" by use of this fuel. (Reference: Section IX "Permit Shield" of this plant's Major Facility Review Permit.

COGENERATION SEMIANNUAL MONITORING REPORT

Excess Emission and Monitoring System Performance Report for BAAQMD & USEPA
Permit to Operate Condition No. 14194 (S-1, 2, 3 & 4)

BAAQMD Plant # 621-Silicon Valley Power COGENERATION PLANT NO. 1

Report for the period from **Sep-19** through **Feb-20**

I. Hours of Plant Operation:

For 6 months,				S-1 Gas Turbine	S-2 Gas Turbine	S-3 Supplemental Burner	S-4 Supplemental Burner
From	Sep-19	To	Feb-20				
Hours of Operation				3,595	3,248	0	0

II. Periods Water to Fuel Ratio Was Outside Permitted Range:

Unit	Start		Corrected		Duration	Ave Fuel Consumption and Turbine Load During Excursion		Remarks
	Date	Time	Date	Time	(hr:min)	MMBTU/HR	KW	
1								
2								

III. Continuous Monitoring System Malfunctions:

Unit	Start		Corrected		Duration	Ave Fuel Consumption and Turbine Load During Monitor Malfunction		Remarks
	Date	Time	Date	Time	(hr:min)	MMBTU/HR	KW	
1					None			Continuous monitoring system was operative for the entire reporting period.
2					None			

IV. Monthly Operating Data:

(The following monthly data provides the basis of the three summary tables found on page 1)

Sep-19	UNIT 1						UNIT 2					
	S-1 Gas Turbine				S-3 Supp Burner		S-2 Gas Turbine				S-4 Supp Burner	
Day	Avg 24Hr H2O/Fuel Ratio	Fuel Used MMBTU	Hrs	MWH	Fuel Used MMBTU	Hrs	Avg 24Hr H2O/Fuel Ratio	Fuel Used MMBTU	Hrs	MWH	Fuel Used MMBTU	Hrs
		(1)			(1)			(1)			(1)	
1	0.60	1,074.52	24.00	68.58	0.00	0.00	0.59	1,067.06	24.00	69.38	0.00	0.00
2	0.60	1,078.45	24.00	69.31	0.00	0.00	0.59	1,063.31	24.00	69.50	0.00	0.00
3	0.60	1,067.98	24.00	68.00	0.00	0.00	0.59	1,047.26	24.00	67.73	0.00	0.00
4	0.60	1,068.72	24.00	67.36	0.00	0.00	0.59	1,052.40	24.00	67.20	0.00	0.00
5	0.60	1,061.46	24.00	67.18	0.00	0.00	0.59	1,039.27	24.00	66.87	0.00	0.00
6	0.60	1,061.42	24.00	67.37	0.00	0.00	0.59	1,039.54	24.00	67.06	0.00	0.00
7	0.60	1,070.32	24.00	67.37	0.00	0.00	0.59	1,050.23	24.00	67.06	0.00	0.00
8	0.60	1,111.44	24.00	70.40	0.00	0.00	0.59	1,101.01	24.00	71.14	0.00	0.00
9	0.60	1,113.25	24.00	70.73	0.00	0.00	0.59	1,108.91	24.00	71.85	0.00	0.00
10	0.60	1,120.46	24.00	71.31	0.00	0.00	0.59	1,125.94	24.00	73.39	0.00	0.00
11	0.60	1,105.88	24.00	70.09	0.00	0.00	0.59	1,103.04	24.00	71.41	0.00	0.00
12	0.60	1,059.55	24.00	67.09	0.00	0.00	0.59	1,051.29	24.00	67.76	0.00	0.00
13	0.60	1,042.99	24.00	66.01	0.00	0.00	0.59	1,037.55	24.00	66.80	0.00	0.00
14	0.60	1,059.44	24.00	67.17	0.00	0.00	0.59	1,045.60	24.00	67.21	0.00	0.00
15	0.60	1,091.84	24.00	69.73	0.00	0.00	0.59	1,084.22	24.00	70.58	0.00	0.00
16	0.60	1,114.60	24.00	70.74	0.00	0.00	0.59	1,103.01	24.00	71.23	0.00	0.00
17	0.60	1,108.81	24.00	70.51	0.00	0.00	0.59	1,097.10	24.00	71.01	0.00	0.00
18	0.60	1,122.87	24.00	71.52	0.00	0.00	0.59	1,119.10	24.00	72.66	0.00	0.00
19	0.60	1,116.93	24.00	71.12	0.00	0.00	0.59	1,117.51	24.00	72.58	0.00	0.00
20	0.60	1,101.87	24.00	70.18	0.00	0.00	0.59	1,114.89	24.00	72.67	0.00	0.00
21	0.60	1,091.97	24.00	69.60	0.00	0.00	0.59	1,108.11	24.00	72.22	0.00	0.00
22	0.60	1,098.77	24.00	70.48	0.00	0.00	0.59	1,111.97	24.00	72.98	0.00	0.00
23	0.60	1,093.06	24.00	69.99	0.00	0.00	0.59	1,105.62	24.00	72.50	0.00	0.00
24	0.60	1,072.39	24.00	68.02	0.00	0.00	0.59	1,085.56	24.00	70.32	0.00	0.00
25	0.60	1,041.98	24.00	66.51	0.00	0.00	0.59	1,054.97	24.00	68.75	0.00	0.00
26	0.60	1,081.56	24.00	68.99	0.00	0.00	0.59	1,082.39	24.00	70.30	0.00	0.00
27	0.60	1,106.70	24.00	70.83	0.00	0.00	0.59	1,099.39	24.00	71.67	0.00	0.00
28	0.60	1,127.47	24.00	71.93	0.00	0.00	0.59	1,127.94	24.00	73.36	0.00	0.00
29	0.60	1,143.38	24.00	73.03	0.00	0.00	0.59	1,142.50	24.00	74.59	0.00	0.00
30	0.60	1,144.54	24.00	74.00	0.00	0.00	0.59	1,142.69	24.00	74.00	0.00	0.00
31												
TOTAL		32,754.62	720.00	2,085.17	0.00	0.00		32,629.38	720.00	2,115.76	0.00	0.00

Oct-19	UNIT 1						UNIT 2					
	S-1 Gas Turbine				S-3 Supp Burner		S-2 Gas Turbine				S-4 Supp Burner	
Day	Avg 24Hr H2O/Fuel Ratio	Fuel Used MMBTU	Hrs	MWH	Fuel Used MMBTU	Hrs	Avg 24Hr H2O/Fuel Ratio	Fuel Used MMBTU	Hrs	MWH	Fuel Used MMBTU	Hrs
	(1)	(1)	(1)	(1)	(1)	(1,2)	(1)	(1)	(1)	(1)	(1)	(1,2)
1	0.60	1,141.32	24.00	72.90	0.00	0.00	0.59	1,137.32	24.00	74.18	0.00	0.00
2	0.60	1,118.22	24.00	71.48	0.00	0.00	0.59	1,102.00	24.00	71.62	0.00	0.00
3	0.60	1,129.15	24.00	72.50	0.00	0.00	0.59	1,124.54	24.00	73.76	0.00	0.00
4	0.60	1,128.18	24.00	71.49	0.00	0.00	0.59	1,115.17	24.00	71.88	0.00	0.00
5	0.60	1,114.29	24.00	70.59	0.00	0.00	0.59	1,107.97	24.00	71.50	0.00	0.00
6	0.60	1,100.77	24.00	69.68	0.00	0.00	0.59	1,100.57	24.00	71.09	0.00	0.00
7	0.60	1,093.60	24.00	69.46	0.00	0.00	0.59	1,099.58	24.00	71.29	0.00	0.00
8	0.60	1,092.55	24.00	69.84	0.00	0.00	0.59	1,101.87	24.00	72.04	0.00	0.00
9	0.60	1,108.61	24.00	71.43	0.00	0.00	0.59	1,121.03	24.00	74.01	0.00	0.00
10	0.60	1,108.69	24.00	70.74	0.00	0.00	0.59	1,121.82	24.00	73.35	0.00	0.00
11	0.60	1,117.96	24.00	71.61	0.00	0.00	0.59	1,118.72	24.00	73.26	0.00	0.00
12	0.60	1,101.84	24.00	71.47	0.00	0.00	0.59	1,109.48	24.00	73.74	0.00	0.00
13	0.60	1,127.20	24.00	72.42	0.00	0.00	0.59	1,138.79	24.00	75.14	0.00	0.00
14	0.60	1,140.08	24.00	73.07	0.00	0.00	0.59	1,146.47	24.00	75.39	0.00	0.00
15	0.60	1,135.02	24.00	72.88	0.00	0.00	0.59	1,145.03	24.00	75.56	0.00	0.00
16	0.60	1,115.29	24.00	72.32	0.00	0.00	0.59	1,128.34	24.00	75.23	0.00	0.00
17	0.60	1,096.48	24.00	70.18	0.00	0.00	0.59	1,091.92	24.00	71.34	0.00	0.00
18	0.60	1,119.25	24.00	72.09	0.00	0.00	0.59	1,129.75	24.00	74.75	0.00	0.00
19	0.60	1,126.09	24.00	73.03	0.00	0.00	0.59	1,127.90	24.00	74.99	0.00	0.00
20	0.60	1,123.80	24.00	71.19	0.00	0.00	0.59	1,112.79	24.00	71.80	0.00	0.00
21	0.60	1,106.24	24.00	69.98	0.00	0.00	0.59	1,104.29	24.00	71.32	0.00	0.00
22	0.60	1,095.94	24.00	69.15	0.00	0.00	0.59	1,104.68	24.00	71.09	0.00	0.00
23	0.60	1,074.88	24.00	68.36	0.00	0.00	0.59	1,083.47	24.00	70.52	0.00	0.00
24	0.60	1,064.27	24.00	67.40	0.00	0.00	0.59	1,069.83	24.00	69.24	0.00	0.00
25	0.60	1,078.73	24.00	68.82	0.00	0.00	0.59	1,046.86	24.00	67.22	0.00	0.00
26	0.60	1,088.15	24.00	69.18	0.00	0.00	0.59	1,085.74	24.00	70.33	0.00	0.00
27	0.60	1,119.85	24.00	71.39	0.00	0.00	0.59	1,106.43	24.00	71.77	0.00	0.00
28	0.60	1,126.62	24.00	72.07	0.00	0.00	0.59	1,109.49	24.00	72.05	0.00	0.00
29	0.60	1,140.58	24.00	73.50	0.00	0.00	0.59	1,113.21	24.00	72.77	0.00	0.00
30	0.60	1,130.73	24.00	73.37	0.00	0.00	0.59	1,140.44	24.00	75.95	0.00	0.00
31	0.60	1,134.56	24.00	73.92	0.00	0.00	0.59	1,135.57	24.00	75.74	0.00	0.00
TOTAL		34,498.91	744.00	2,207.52	0.00	0.00		34,481.09	744.00	2,253.90	0.00	0.00

(1) Fuel consumed is based on summarized one minute actual #/Hr flow rates / 60 min/Hr * 21,084 BTU/# (Gas) normalized to the revenue meter to correct for Therm Factor.

Nov-19	UNIT 1						UNIT 2					
	S-1 Gas Turbine				S-3 Supp Burner		S-2 Gas Turbine				S-4 Supp Burner	
Day	Avg 24Hr H2O/Fuel Ratio	Fuel Used MMBTU	Hrs	MWH	Fuel Used MMBTU	Hrs	Avg 24Hr H2O/Fuel Ratio	Fuel Used MMBTU	Hrs	MWH	Fuel Used MMBTU	Hrs
	(1)	(1)	(1)	(1)	(1)	(1,2)	(1)	(1)	(1)	(1)	(1)	(1,2)
1	0.60	1,126.34	24.00	73.587	0.00	0.00	0.59	1,127.17	24.00	75.36	0.00	0.00
2	0.59	487.00	11.00	31.918	0.00	0.00	0.59	1,131.42	24.00	75.33	0.00	0.00
3	0.59	240.13	7.00	14.603	0.00	0.00	0.59	1,191.78	25.00	78.42	0.00	0.00
4	0.58	798.43	20.00	50.821	0.00	0.00	0.59	1,132.39	24.00	75.38	0.00	0.00
5	0.60	1,138.71	24.00	74.778	0.00	0.00	0.59	1,133.59	24.00	75.26	0.00	0.00
6	0.60	1,148.99	24.00	75.298	0.00	0.00	0.59	1,142.39	24.00	75.78	0.00	0.00
7	0.60	1,148.79	24.00	75.132	0.00	0.00	0.59	1,140.53	24.00	75.52	0.00	0.00
8	0.60	1,102.60	24.00	70.261	0.00	0.00	0.59	1,092.65	24.00	70.42	0.00	0.00
9	0.60	1,129.07	24.00	72.381	0.00	0.00	0.59	1,122.46	24.00	72.96	0.00	0.00
10	0.60	1,109.37	24.00	70.290	0.00	0.00	0.59	1,096.98	24.00	70.33	0.00	0.00
11	0.60	1,116.12	24.00	71.500	0.00	0.00	0.59	1,110.41	24.00	72.00	0.00	0.00
12	0.60	1,114.07	24.00	71.096	0.00	0.00	0.59	1,109.88	24.00	71.69	0.00	0.00
13	0.60	1,127.48	24.00	72.795	0.00	0.00	0.59	1,121.84	24.00	73.33	0.00	0.00
14	0.60	1,125.37	24.00	72.009	0.00	0.00	0.59	1,112.40	24.00	71.95	0.00	0.00
15	0.60	1,116.91	24.00	71.903	0.00	0.00	0.59	1,105.32	24.00	71.84	0.00	0.00
16	0.60	1,117.10	24.00	71.693	0.00	0.00	0.59	1,105.29	24.00	71.73	0.00	0.00
17	0.60	1,111.60	24.00	71.069	0.00	0.00	0.59	1,102.85	24.00	71.31	0.00	0.00
18	0.60	1,111.62	24.00	71.285	0.00	0.00	0.59	1,106.34	24.00	71.81	0.00	0.00
19	0.60	1,114.79	24.00	72.230	0.00	0.00	0.59	1,116.44	24.00	73.40	0.00	0.00
20	0.60	1,109.45	24.00	71.867	0.00	0.00	0.59	1,107.11	24.00	72.82	0.00	0.00
21	0.60	1,129.34	24.00	73.382	0.00	0.00	0.59	1,117.75	24.00	73.65	0.00	0.00
22	0.60	1,130.88	24.00	73.399	0.00	0.00	0.59	679.60	17.00	44.69	0.00	0.00
23	0.60	1,107.41	24.00	70.905	0.00	0.00	0.59	383.69	13.00	23.82	0.00	0.00
24	0.60	1,128.28	24.00	72.265	0.00	0.00	0.59	1,070.75	24.00	70.01	0.00	0.00
25	0.60	1,134.53	24.00	73.158	0.00	0.00	0.59	1,119.12	24.00	73.90	0.00	0.00
26	0.60	1,136.09	24.00	73.546	0.00	0.00	0.59	1,107.01	24.00	73.29	0.00	0.00
27	0.60	1,128.35	24.00	72.761	0.00	0.00	0.59	1,096.60	24.00	72.45	0.00	0.00
28	0.60	1,156.54	24.00	75.557	0.00	0.00	0.59	1,125.50	24.00	75.34	0.00	0.00
29	0.60	1,165.79	24.00	76.031	0.00	0.00	0.59	1,135.39	24.00	76.23	0.00	0.00
30	0.60	1,165.79	24.00	76.031	0.00	0.00	0.59	1,135.39	24.00	76.23	0.00	0.00
31												
TOTAL		31,976.97	686.00	2,063.55	0.00	0.00		32,380.03	703.00	2,126.26	0.00	0.00

Dec-19	UNIT 1						UNIT 2					
	S-1 Gas Turbine				S-3 Supp Burner		S-2 Gas Turbine				S-4 Supp Burner	
Day	Avg 24Hr H2O/Fuel Ratio	Fuel Used MMBTU	Hrs	MWH	Fuel Used MMBTU	Hrs	Avg 24Hr H2O/Fuel Ratio	Fuel Used MMBTU	Hrs	MWH	Fuel Used MMBTU	Hrs
	(1)	(1)	(1)	(1)	(1)	(1,2)	(1)	(1)	(1)	(1)	(1)	(1,2)
1	0.60	1,143.06	24.00	74.488	0.00	0.00	0.59	1,110.17	24.00	74.32	0.00	0.00
2	0.60	1,140.32	24.00	74.332	0.00	0.00	0.59	1,109.81	24.00	74.45	0.00	0.00
3	0.60	1,128.82	24.00	73.818	0.00	0.00	0.59	1,124.26	24.00	76.20	0.00	0.00
4	0.60	1,125.52	24.00	73.360	0.00	0.00	0.59	1,072.46	24.00	71.29	0.00	0.00
5	0.60	1,102.30	24.00	71.498	0.00	0.00	0.59	1,038.83	24.00	68.21	0.00	0.00
6	0.59	417.54	10.00	27.103	0.00	0.00	0.59	393.91	10.00	25.95	0.00	0.00
7	0.00	0.00	0.00	0.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
8	0.00	0.00	0.00	0.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
9	0.57	320.51	8.00	20.294	0.00	0.00	0.59	305.79	8.00	19.45	0.00	0.00
10	0.60	1,089.15	24.00	71.584	0.00	0.00	0.59	1,074.88	24.00	71.45	0.00	0.00
11	0.60	1,130.72	24.00	75.572	0.00	0.00	0.59	1,117.32	24.00	75.55	0.00	0.00
12	0.60	1,139.91	24.00	76.247	0.00	0.00	0.59	1,119.36	24.00	75.45	0.00	0.00
13	0.60	1,147.33	24.00	76.955	0.00	0.00	0.59	1,130.12	24.00	76.63	0.00	0.00
14	0.60	1,154.51	24.00	76.817	0.00	0.00	0.59	1,139.27	24.00	76.51	0.00	0.00
15	0.60	1,158.17	24.00	77.046	0.00	0.00	0.59	1,142.14	24.00	76.75	0.00	0.00
16	0.60	1,139.78	24.00	75.601	0.00	0.00	0.59	1,139.04	24.00	76.67	0.00	0.00
17	0.60	1,123.89	24.00	74.697	0.00	0.00	0.59	1,133.71	24.00	76.81	0.00	0.00
18	0.60	1,124.78	24.00	74.769	0.00	0.00	0.59	1,134.28	24.00	76.88	0.00	0.00
19	0.60	1,178.35	24.00	79.837	0.00	0.00	0.59	1,133.29	24.00	77.06	0.00	0.00
20	0.61	1,202.08	24.00	81.817	0.00	0.00	0.59	1,145.99	24.00	78.03	0.00	0.00
21	0.61	1,198.44	24.00	81.110	0.00	0.00	0.59	1,107.96	24.00	74.28	0.00	0.00
22	0.61	1,204.95	24.00	81.375	0.00	0.00	0.59	1,122.50	24.00	75.28	0.00	0.00
23	0.61	1,166.19	24.00	77.912	0.00	0.00	0.59	1,137.16	24.00	76.66	0.00	0.00
24	0.61	1,051.42	24.00	67.256	0.00	0.00	0.59	1,033.06	24.00	66.97	0.00	0.00
25	0.61	1,049.35	24.00	67.074	0.00	0.00	0.59	1,031.86	24.00	66.79	0.00	0.00
26	0.61	1,051.76	24.00	67.714	0.00	0.00	0.59	1,038.32	24.00	67.51	0.00	0.00
27	0.61	1,175.13	24.00	78.362	0.00	0.00	0.59	1,157.22	24.00	78.09	0.00	0.00
28	0.61	1,182.12	24.00	79.136	0.00	0.00	0.59	1,164.19	24.00	78.89	0.00	0.00
29	0.61	1,184.43	24.00	79.020	0.00	0.00	0.59	1,163.92	24.00	78.74	0.00	0.00
30	0.61	1,182.52	24.00	79.237	0.00	0.00	0.59	1,141.86	24.00	76.75	0.00	0.00
31	0.61	1,180.21	24.00	79.053	0.00	0.00	0.59	1,138.80	24.00	76.57	0.00	0.00
TOTAL		31,593.25	666.00	2,093.09	0.00	0.00		30,801.47	666.00	2,064.21	0.00	0.00

(1) Fuel consumed is based on summarized one minute actual #/Hr flow rates / 60 min/Hr * 21,084 BTU/# (Gas) normalized to the revenue meter to correct for Therm Factor.

Jan-20	UNIT 1						UNIT 2					
	S-1 Gas Turbine				S-3 Supp Burner		S-2 Gas Turbine				S-4 Supp Burner	
Day	Avg 24Hr H2O/Fuel Ratio	Fuel Used MMBTU	Hrs	MWH	Fuel Used MMBTU	Hrs	Avg 24Hr H2O/Fuel Ratio	Fuel Used MMBTU	Hrs	MWH	Fuel Used MMBTU	Hrs
	(1)	(1)	(1)	(1)	(1)	(1,2)	(1)	(1)	(1)	(1)	(1)	(1,2)
1	0.60	336.62	7.00	22.18	0.00	0.00	0.59	325.58	7.00	21.59	0.00	0.00
2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
5	0.61	148.09	4.00	8.75	0.00	0.00	0.59	142.18	4.00	8.49	0.00	0.00
6	0.61	1,070.87	24.00	68.38	0.00	0.00	0.59	1,055.44	24.00	68.08	0.00	0.00
7	0.61	1,177.10	24.00	78.08	0.00	0.00	0.59	1,142.26	24.00	76.36	0.00	0.00
8	0.61	1,189.14	24.00	79.47	0.00	0.00	0.59	1,144.49	24.00	76.78	0.00	0.00
9	0.61	1,185.15	24.00	78.85	0.00	0.00	0.59	1,152.60	24.00	77.32	0.00	0.00
10	0.61	1,192.47	24.00	79.35	0.00	0.00	0.59	1,164.28	24.00	78.41	0.00	0.00
11	0.61	1,194.57	24.00	79.27	0.00	0.00	0.59	1,172.06	24.00	79.00	0.00	0.00
12	0.61	1,199.44	24.00	79.48	0.00	0.00	0.59	1,175.49	24.00	79.20	0.00	0.00
13	0.61	1,194.94	24.00	79.29	0.00	0.00	0.59	1,170.06	24.00	78.99	0.00	0.00
14	0.61	1,210.25	24.00	80.78	0.00	0.00	0.60	1,171.59	24.00	79.07	0.00	0.00
15	0.61	1,220.44	24.00	81.38	0.00	0.00	0.59	1,170.77	24.00	79.02	0.00	0.00
16	0.61	1,230.48	24.00	81.81	0.00	0.00	0.59	1,176.38	24.00	79.21	0.00	0.00
17	0.59	901.56	20.00	58.39	0.00	0.00	0.59	865.22	20.00	56.40	0.00	0.00
18	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
19	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
20	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
21	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
22	0.00	0.00	0.00	0.00	0.00	0.00	0.59	484.65	12.00	30.74	0.00	0.00
23	0.00	0.00	0.00	0.00	0.00	0.00	0.59	578.67	14.00	37.24	0.00	0.00
24	0.00	0.00	0.00	0.00	0.00	0.00	0.59	217.56	7.00	13.09	0.00	0.00
25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
26	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
27	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
28	0.00	0.00	0.00	0.00	0.00	0.00	0.59	111.91	5.00	6.77	0.00	0.00
29	0.00	0.00	0.00	0.00	0.00	0.00	0.59	533.03	15.00	32.75	0.00	0.00
30	0.00	0.00	0.00	0.00	0.00	0.00	0.59	1,089.07	24.00	71.11	0.00	0.00
31	0.00	0.00	0.00	0.00	0.00	0.00	0.59	1,066.65	24.00	69.41	0.00	0.00
TOTAL		14,451.12	295.00	955.47	0.00	0.00		18,109.95	396.00	1,199.02	0.00	0.00

Feb-20	UNIT 1						UNIT 2					
	S-1 Gas Turbine				S-3 Supp Burner		S-2 Gas Turbine				S-4 Supp Burner	
Day	Avg 24Hr H2O/Fuel Ratio	Fuel Used MMBTU	Hrs	MWH	Fuel Used MMBTU	Hrs	Avg 24Hr H2O/Fuel Ratio	Fuel Used MMBTU	Hrs	MWH	Fuel Used MMBTU	Hrs
	(1)	(1)	(1)	(1)	(1)	(1,2)	(1)	(1)	(1)	(1)	(1)	(1,2)
1	0.00	0.00	0.00	0.00	0.00	0.00	0.59	323.11	8.00	21.14	0.00	0.00
2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
6	0.59	342.45	9.00	21.48	0.00	0.00	0.59	288.98	8.00	17.98	0.00	0.00
7	0.60	1,166.89	24.00	77.71	0.00	0.00	0.59	88.20	3.00	5.69	0.00	0.00
8	0.60	1,200.72	24.00	80.80	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
9	0.60	1,198.88	24.00	80.67	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
10	0.60	1,179.98	24.00	79.35	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
11	0.60	1,169.69	24.00	78.82	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
12	0.60	1,186.83	24.00	79.96	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
13	0.60	1,201.05	24.00	80.88	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
14	0.60	1,193.27	24.00	80.31	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
15	0.60	1,190.53	24.00	80.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
16	0.60	1,198.12	24.00	80.34	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
17	0.59	411.92	9.00	27.46	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
18	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
19	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
20	0.59	407.88	10.00	26.15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
21	0.60	1,178.16	24.00	78.93	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
22	0.60	1,181.66	24.00	79.27	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
23	0.60	1,205.01	24.00	80.56	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
24	0.60	1,194.61	24.00	79.78	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
25	0.60	1,176.33	24.00	78.58	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
26	0.60	1,174.17	24.00	78.43	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
27	0.60	1,169.52	24.00	78.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
28	0.60	1,172.12	24.00	78.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
29	0.60	1,201.19	24.00	81.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
30												
31												
TOTAL		23,700.99	484.00	1,586.57	0.00	0.00		700.29	19.00	44.80	0.00	0.00

(1) Fuel consumed is based on summarized one minute actual #/Hr flow rates / 60 min/Hr * 21,084 BTU/# (Gas) normalized to the revenue meter to correct for Therm Factor.