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RETURN RECEIPT**

July 13, 2020

TV Tracking #: 18

1.  RECEIVED IN ENFORCEMENT: 07/13/2020

Mr. Jeff Gove  
Director of Compliance and Enforcement  
Bay Area Air Quality Management District  
375 Beale St  
San Francisco, CA 94105

**RE: Amendment to Semi-Annual Monitoring Report at Dynegy Oakland, LLC  
(Facility # B1887)**

Dear Mr. Gove:

Pursuant to condition I.F. of Major Facility Review Permit Number B1887, The Dynegy Oakland, LLC encloses its amended semiannual monitoring compliance report for the Oakland Power Plant, covering the period September 1, 2019 to February 28, 2020. The amended report is being submitted to update incorrect information contained within the original report, submitted on 03/27/20, following the Notice of Violation (No. A 56076) issued to Dynegy Oakland, LLC on 06/23/20.

The amended Semi-Annual Monitoring Report contains the following changes:

**Page 5 of 7:**

Notes: changed from "Tables below show compliance with the source test requirements" to "Table I below shows noncompliance on Turbine Engines 1A, 1B, 2A, 2B, 3A, and 3B."

Table I – Source Test Compliance Information for Permit Renewal – Issued 01/23/18  
[basis: 2-1-403, 2-6-503]

In the column "Less than or equal to the first 877 hours after the issuance of the Renewal Permit or 2 years after the Renewal Permit? (yes/no)", all responses have been changed from "Yes – complies" to "No – 2 year limit exceeded; Letter of Deviation submitted; source testing scheduled"

If you have any questions regarding this report, please contact Mr. Spencer Vartanian, Environmental Manager of my staff at [spencer.vartanian@vistraenergy.com](mailto:spencer.vartanian@vistraenergy.com) or Vince Dodge, Director of Environmental Compliance at [vincent.dodge@vistraenergy.com](mailto:vincent.dodge@vistraenergy.com).

Sincerely,

A handwritten signature in blue ink, appearing to read "Mike Batte".

Mike Batte  
Managing Director  
Moss Landing and Oakland Power Plants

Enclosure(s): 7 pages

Email CC:  
Scott Applin  
Richard Carrillo  
Vince Dodge  
Michael Le  
Spencer Vartanian

File: OPP 401.40.02

**Major Facility Review Permit - Semiannual Monitoring Compliance Report**  
**Oakland Power Plant - Facility #B1887**  
**September 1, 2019 to February 28, 2020**

As required by Permit Condition I.F, the following table summarizes the compliance with the monitoring requirements of Tables VII – A, VII - B and VII - C.

Type of Limit*	Emission Limit Citation*	Emission Limit*	Monitoring Requirement Citation*	Monitoring Frequency (P/C/N)*	Monitoring Type*	Compliance Summary
<b>Table VII – A Applicable Limits and Compliance Monitoring Requirements, S1, S2, S3, S4, S5, &amp; S6</b>						
NO <sub>x</sub>	BAAQMD 9-9-302.2	42 ppmv, dry @ 15% O <sub>2</sub>	BAAQMD condition #2571, part 12b	P/D	water-to-fuel monitoring	The water-to-fuel ratio is checked daily when operating and adjusted, if necessary, to meet the ≥ 60% and ≤ 75% limit of permit condition #2571, part 8.
	BAAQMD 9-9-302.2	42 ppmv, dry @ 15% O <sub>2</sub>	BAAQMD condition #2571, part 10	P/every 2000 hours of operation	source test	No source tests were required during this period. See note 1.
	BAAQMD condition #2571, part 3a	75 ppmv, dry @ 15% O <sub>2</sub> , 3-hr average	BAAQMD condition #2571, part 12b	C	water-to-fuel monitoring	The water-to-fuel ratio is checked daily when operating and adjusted, if necessary, to meet the ≥ 60% and ≤ 75% limit of permit condition #2571, part 8.
	BAAQMD condition #2571, part 3a	75 ppmv, dry @ 15% O <sub>2</sub> , 3-hr average	BAAQMD condition #2571, part 10	P/every 2000 hours of operation	source test	No source tests were required during this period. See note 1.
	BAAQMD condition #2571, part 3b	42 ppmv, dry @ 15% O <sub>2</sub> , except for startup and shutdown	BAAQMD condition #2571, part 12b	P/H	water-to-fuel monitoring	The water-to-fuel ratio is checked daily when operating and adjusted, if necessary, to meet the ≥ 60% and ≤ 75% limit of permit condition #2571, part 8.
	BAAQMD condition #2571, part 3b	42 ppmv, dry @ 15% O <sub>2</sub> , except for startup and shutdown	BAAQMD condition #2571, part 10	P/every 2000 hours of operation	source test	No source tests were required during this period. See note 1.
	BAAQMD condition #2571, part 16	Nitrogen content of fuel < 500 ppm by weight	BAAQMD condition #2571, part 9	P/E	fuel analysis or certification	Each shipment of fuel received had nitrogen content less than 500 ppm by weight

\* As stated in Tables VII – A, VII - B and VII - C of the permit.

**Major Facility Review Permit - Semiannual Monitoring Compliance Report**  
**Oakland Power Plant - Facility #B1887**  
**September 1, 2019 to February 28, 2020**

Type of Limit*	Emission Limit Citation*	Emission Limit*	Monitoring Requirement Citation*	Monitoring Frequency (P/C/N)*	Monitoring Type*	Compliance Summary
<b>Table VII – A Applicable Limits and Compliance Monitoring Requirements, S1, S2, S3, S4, S5, &amp; S6</b>						
SO <sub>2</sub>	BAAQMD 9-1-301	GLC 0.5 ppm (3 min average) 0.25 ppm (60 min average) 0.05 ppm (24 hr average)		N		n/a
	BAAQMD 9-1-304	Sulfur content of fuel < 0.5% by weight	BAAQMD condition #2571, part 9	P/E	fuel analysis or certification	Each shipment of fuel received had sulfur content less than 0.10% by weight.
	BAAQMD condition #2571, part 4	Sulfur content of fuel < 0.3% by weight	BAAQMD condition #2571, part 9	P/E	fuel analysis or certification	Each shipment of fuel received had sulfur content less than 0.10% by weight.
Opacity	SIP Regulation 6-301	Ringelmann No. 1 for no more than 3 min/hr	BAAQMD condition #2571, part 11	P/every 400 hours of operation	visible emissions check	The operator checks for visible emission at each day time turbine start up. Startups occurred more frequently than every 400 hours.
	BAAQMD 6-1-301	Ringelmann No. 1 for no more than 3 min/hr	BAAQMD condition #2571, part 11	P/every 400 hours of operation	visible emissions check	The operator checks for visible emission at each day time turbine start up. Startups occurred more frequently than every 400 hours.
FP	SIP Regulation 6-310	0.15 grain/dscf		N		n/a
	BAAQMD 6-310	0.15 grain/dscf		N		n/a
NMOC	BAAQMD condition #2571, part 5	< 40 lb/hr for all turbines combined	BAAQMD condition #2571, part 10	P/every 2000 hours of operation	source test	No source tests were required during this period. See note 1.

\* As stated in Tables VII – A, VII - B and VII - C of the permit.

**Major Facility Review Permit - Semiannual Monitoring Compliance Report**  
**Oakland Power Plant - Facility #B1887**  
**September 1, 2019 to February 28, 2020**

Type of Limit*	Emission Limit Citation*	Emission Limit*	Monitoring Requirement Citation*	Monitoring Frequency (P/C/N)*	Monitoring Type*	Compliance Summary
<b>Table VII – A Applicable Limits and Compliance Monitoring Requirements, S1, S2, S3, S4, S5, &amp; S6</b>						
Lead	BAAQMD 11-1-301	15 lb/day		N		n/a
	BAAQMD 11-1-302	GLC not to exceed 1.0 ug/cm, 24 hr. avg.		N		n/a
Hours of operation	BAAQMD 9-9-302	< 877 hr/per 12-month period for each turbine	BAAQMD 9-9-502	P/E	records	Each turbine operated less than 877 hours per 12-month period as shown in Table II, Note 2, of this document.
	BAAQMD condition #2571, part 6	< 5000 hr/yr for all turbines combined	BAAQMD condition #2571, part 12	P/E	records	The total operating hours for the year <b>2019</b> were <b>242.0</b> hours. The total operating hours for the year <b>2020</b> as of <b>2/28/20</b> were <b>36.9</b> hours.
Water to Fuel Ratio	BAAQMD condition #2571, part 8	60% to 75% by volume	BAAQMD condition #2571, part 12b	D	Fuel and Water Meter	The ratio of water to fuel is check and logged at least daily when a turbine runs for at least 1 hour.
<b>Table VII – B Applicable Limits and Compliance Monitoring Requirements, S9: Wipe Cleaning</b>						
VOC	BAAQMD condition #5974, part 1	< 20 gal/yr	BAAQMD condition #5974, part 2	P/D	records	No solvent wipe cleaning occurred during this report period.
<b>Table VII – C Applicable Limits and Compliance Monitoring Requirements, S-20: Emergency Standby Diesel Engine</b>						
Opacity	SIP Regulation 6-303	Ringelmann No. 2 for no more than 3 min/hr		N		n/a
	BAAQMD 6-1-303	Ringelmann No. 2 for no more than 3 min/hr		N		n/a
FP	SIP Regulation 6-310	0.15 gr/dscf		N		n/a

\* As stated in Tables VII – A, VII - B and VII - C of the permit.

**Major Facility Review Permit - Semiannual Monitoring Compliance Report**  
**Oakland Power Plant - Facility #B1887**  
**September 1, 2019 to February 28, 2020**

Type of Limit*	Emission Limit Citation*	Emission Limit*	Monitoring Requirement Citation*	Monitoring Frequency (P/C/N)*	Monitoring Type*	Compliance Summary
<b>Table VII – C Applicable Limits and Compliance Monitoring Requirements, S-20: Emergency Standby Diesel Engine</b>						
FP	BAAQMD 6-1-310	0.15 gr/dscf		N		n/a
SO <sub>2</sub>	BAAQMD 9-1-301	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		n/a
	BAAQMD 9-1-304	Fuel Sulfur Limit 0.5%	BAAQMD Regulation 9-1-502	N		n/a
Hours of Operation	BAAQMD 9-8-330	50 hours in a calendar year	BAAQMD 9-8-530	P/M/each time fuel is added	records	The emergency standby diesel engine operated <b>1.8</b> hours for reliability-related activities in <b>2019</b> . And <b>0.0</b> hours as of <b>02/28/2020</b> .
	Condition 22820, part 1	20 hours in a calendar year	Condition 22820, part 3	C	Totalizing hour meter	The emergency standby diesel engine operated <b>1.8</b> hours for reliability-related activities in <b>2019</b> . And <b>0.0</b> hours as of <b>02/28/2020</b> .

Monitory Frequency Codes:

(P) – periodic    (C) – continuous    (A) – annual    (Q) – quarterly    (M) – monthly    (W) – weekly    (D) – daily    (E) – event basis    (N) – no monitoring  
(H) – hourly

\* As stated in Tables VII – A, VII - B and VII - C of the permit.

**Major Facility Review Permit - Semiannual Monitoring Compliance Report  
Oakland Power Plant - Facility #B1887  
September 1, 2019 to February 28, 2020**

**Notes:**

Table I below shows noncompliance on Turbine Engines 1A, 1B, 2A, 2B, 3A, and 3B

**TABLE I  
Source Test Compliance Information for Permit Renewal – Issued 01/23/18 [basis: 2-1-403, 2-6-503]**

Turbine Engine	Date of Currently Applicable Source Test	Hours of operation since date of issuance of the Permit, <b>01/23/18</b> .	Less than or equal to the first 877 hours after the issuance of the Renewal Permit or 2 years after the renewal Permit? (yes/no)
1A	None	<b>164.6</b>	No – 2 year limit exceeded; Letter of Deviation submitted; source testing scheduled
1B	None	<b>43.1</b>	No – 2 year limit exceeded; Letter of Deviation submitted; source testing scheduled
2A	None	<b>198.0</b>	No – 2 year limit exceeded; Letter of Deviation submitted; source testing scheduled
2B	None	<b>49.5</b>	No – 2 year limit exceeded; Letter of Deviation submitted; source testing scheduled
3A	None	<b>23.0</b>	No – 2 year limit exceeded; Letter of Deviation submitted; source testing scheduled
3B	None	<b>55.3</b>	No – 2 year limit exceeded; Letter of Deviation submitted; source testing scheduled

**TABLE II  
Source Test Compliance Information for last Source Test – Issued 01/23/18 [basis: 2-6-409.2]**

Turbine Engine	Date of Currently Applicable Source Test	Hours of operation since the currently applicable source test.	Less than or equal to 2,000 hours since the last applicable source test? (yes/no)
1A	10/09/14	<b>387.3</b>	Yes – complies
1B	10/09/14	<b>259.9</b>	Yes – complies
2A	10/09/14	<b>479.9</b>	Yes – complies
2B	10/09/14	<b>406.4</b>	Yes – complies
3A	10/09/14	<b>246.4</b>	Yes – complies
3B	10/09/14	<b>385.2</b>	Yes – complies

\* As stated in Tables VII – A, VII - B and VII - C of the permit.

**Major Facility Review Permit - Semiannual Monitoring Compliance Report  
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Table III below shows compliance with 877 hours operating hours per 12-month period limit.

**TABLE III  
Operating Hours Rolling 12-Month Compliance Information [basis: BAAQMD 9-9-302 & 9-9-502]**

	Turbine Engine 1A Rolling 12-Month Operating Hours	Turbine Engine 1B Rolling 12-Month Operating Hours	Turbine Engine 2A Rolling 12-Month Operating Hours	Turbine Engine 2B Rolling 12-Month Operating Hours	Turbine Engine 3A Rolling 12-Month Operating Hours	Turbine Engine 3B Rolling 12-Month Operating Hours	Less than 877 hours for 12 month period for each Turbine?
March 2019	67.3	33.3	73.2	24.0	18.7	39.2	yes
April 2019	71.9	37.8	73.2	24.0	18.7	39.2	yes
May 2019	71.7	37.6	73.0	23.8	18.5	39.0	yes
June 2019	44.7	23.8	51.5	8.4	18.5	39.0	yes
July 2019	12.6	6.9	1.7	0.9	13.7	12.8	yes
August 2019	8.6	8.5	3.5	2.5	14.9	14.1	yes
September 2019	8.1	7.7	3.5	2.5	14.9	14.1	yes
October 2019	94.2	11.2	77.2	24.6	4.2	15.8	yes
November 2019	94.2	11.2	76.2	24.6	4.2	15.8	yes
December 2019	99.0	11.2	87.5	24.7	3.8	15.8	yes
January 2020	99.0	11.2	124.4	24.7	3.8	15.8	yes
February 2020	97.2	9.7	124.4	24.7	3.8	15.8	yes

**TABLE VI  
Annual Operating Hours Compliance Information [basis: BAAQMD Cond. #2571, part 6 & 12]**

	Turbine Engine 1A Operating Hours	Turbine Engine 1B Operating Hours	Turbine Engine 2A Operating Hours	Turbine Engine 2B Operating Hours	Turbine Engine 3A Operating Hours	Turbine Engine 3B Operating Hours	Less than 5,000 hours for all combined Turbines?
TOTAL 2019	99.0	11.2	87.5	24.7	3.8	15.8	yes
YTD 2020	0.0	0.0	36.9	0.0	0.0	0.0	yes

\* As stated in Tables VII – A, VII - B and VII - C of the permit.



**Major Facility Review Permit - Semiannual Monitoring Compliance Report  
Oakland Power Plant - Facility #B1887  
September 1, 2019 to February 28, 2020**

Table V below shows compliance with monthly tabulation of the Diesel Emergency Engine during the reporting period of this report.

**TABLE V  
Monthly Operating Hours Compliance Information [Basis: Regulation 9-8-530]**

	Deutz Diesel reliability hours	Deutz Diesel emergency hours	Total hours	Fuel usage	Nature of emergency
March 2019	0.2 hrs	0.0 hrs	0.2 hrs	0.70 gal	
April 2019	0.3 hrs	0.0 hrs	0.3 hrs	1.05 gal	
May 2019	0.1 hrs	0.0 hrs	0.1 hrs	0.35 gal	
June 2019	0.3 hrs	0.0 hrs	0.3 hrs	1.05 gal	
July 2019	0.3 hrs	0.0 hrs	0.3 hrs	1.05 gal	
August 2019	0.2 hrs	0.0 hrs	0.2 hrs	0.70 gal	
September 2019	0.0 hrs	0.0 hrs	0.0 hrs	0.00 gal	
October 2019	0.0 hrs	0.0 hrs	0.0 hrs	0.00 gal	
November 2019	0.1 hrs	0.0 hrs	0.1 hrs	0.35 gal	
December 2019	0.0 hrs	0.0 hrs	0.0 hrs	0.00 gal	
January 2020	0.0 hrs	0.0 hrs	0.0 hrs	0.00 gal	
February 2020	0.0 hrs	0.0 hrs	0.0 hrs	0.00 gal	
<b>TOTAL</b>	<b>1.5 hrs</b>	<b>0.0 hrs</b>	<b>1.5 hrs</b>	<b>5.25 gal</b>	

\* As stated in Tables VII – A, VII - B and VII - C of the permit.