

TV Tracking #1097 (Semi-Annual)

OAKLAND POWER COMPANY LLC  
PO BOX 690  
MOSS LANDING CA 95039  
831-633-6700

1.  RECEIVED IN  
ENFORCEMENT: 03/12/2025

March 12, 2025

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

**RE: Oakland Power Plant Semiannual Monitoring Report, Site #B1887**

Dear Director:

Pursuant to Condition I.F. of Major Facility Review Permit Number B1887, the Oakland Power Plant encloses its semiannual monitoring compliance report for the Oakland Power Plant, covering the period **September 1, 2024 to February 28, 2025**. The Power Plant is located at 50 Martin Luther King Jr. Way, Oakland, CA 94607.

Oakland Power Plant has successfully maintained compliance with all applicable air quality regulations and permit conditions during the reporting period from September 1, 2024, to February 28, 2025. There were no deviations from permit requirements, and all emissions limits, monitoring, and operational constraints were met as specified in Tables VII – A, VII – B, and VII.

Should you have any questions or need additional information regarding this report please contact Peter Ziegler, VP Gas Operations, at [peter.ziegler@vistracorp.com](mailto:peter.ziegler@vistracorp.com) or Laura Dale, Environmental Manager at [laura.dale@vistracorp.com](mailto:laura.dale@vistracorp.com).

Based on information and belief formed after reasonable inquiry, I certify that the enclosed monitoring report is true, accurate, and complete.

Sincerely,



Peter Ziegler  
VP, Gas Operations  
Moss Landing and Oakland Power Plants

Enclosures: 9 pages

cc: Michael Le  
Peter Homnick  
Sylvia Zamudio

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Electronic File: <https://txu.sharepoint.com/:f:/r/sites/MLG/EHS%20Compliance/DUKE-PGE/REG/Zamudio/Air/Report-%20OPP%20Title%20V%20Semiannual?csf=1&web=1&e=ANu4PY>

**Major Facility Review Permit - Semiannual Monitoring Compliance Report**  
**Oakland Power Plant - Facility #B1887**  
**September 1, 2024 to February 28, 2025**

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, 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.

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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, 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 daytime 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 daytime 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.

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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, 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>2024</b> were <b>322.7</b> hours. The total operating hours for the year <b>2025</b> as of <b>2/28/25</b> were <b>43.0</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

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**September 1, 2024 to February 28, 2025**

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>0.0</b> hours for reliability-related activities in <b>2024</b> . And <b>0.0</b> hours in <b>2025</b> as of <b>2/28/25</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>0.0</b> hours for reliability-related activities in <b>2024</b> . And <b>0.0</b> hours in <b>2025</b> as of <b>2/28/25</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

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**Notes:** Tables below show compliance with the source test requirements.

**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	07/21/20	<b>702.9</b>	No, >2 years, in compliance w/source test dated 07/21/2020
1B	07/21/20	<b>1174.5</b>	No, >2 years, in compliance w/source test dated 07/21/2020
3A	07/21/20	<b>471.5</b>	No, >2 years, in compliance w/source test dated 07/21/2020
3B	07/21/20	<b>864.3</b>	No, >2 years, in compliance w/source test dated 07/21/2020

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

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**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	07/21/20	524.2	Yes – complies
1B	07/21/20	1131.0	Yes – complies
3A	07/23/20	448.1	Yes – complies
3B	07/23/20	808.7	Yes – complies

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Table III below shows compliance with 877 hours operating hours per 12-month period limit.

**TABLE III a.  
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 1A Rolling 12-Month Emergency Operating Hours	Turbine Engine 1B Rolling 12-Month Operating Hours	Turbine Engine 1B Rolling 12-Month Emergency Operating Hours	Less than 877 hours for 12-Month period for each Turbine?
Mar 2024	54.2	0.0	193.4	0.0	yes
Apr 2024	54.2	0.0	193.4	0.0	yes
May 2024	54.3	0.0	193.2	0.0	yes
Jun 2024	54.3	0.0	193.7	0.0	yes
July 2024	71.9	0.0	203.5	0.0	yes
Aug 2024	76.0	0.0	203.3	0.0	yes
Sept 2024	76.2	0.0	203.3	0.0	yes
Oct 2024	78.4	0.0	113.3	0.0	yes
Nov 2024	78.4	0.0	89.8	0.0	yes
Dec 2024	78.3	0.0	88.1	0.0	yes
Jan 2025	67.8	0.0	67.6	0.0	yes
Feb 2025	62.2	0.0	67.6	0.0	yes

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

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Table III below shows compliance with 877 hours operating hours per 12-month period limit.

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

	Turbine Engine 3A Rolling 12-Month Operating Hours	Turbine Engine 3A Rolling 12-Month Emergency Operating Hours	Turbine Engine 3B Rolling 12-Month Operating Hours	Turbine Engine 3B Rolling 12-Month Emergency Operating Hours	Less than 877 hours for 12-Month period for each Turbine?
Mar 2024	77.8	0.0	94.4	0.0	yes
Apr 2024	77.8	0.0	94.4	0.0	yes
May 2024	77.9	0.0	94.4	0.0	yes
Jun 2024	79.9	0.0	94.4	0.0	yes
July 2024	87.8	0.0	109.2	0.0	yes
Aug 2024	85.4	0.0	113.8	0.0	yes
Sept 2024	86.1	0.0	113.8	0.0	yes
Oct 2024	90.4	0.0	92.3	0.0	yes
Nov 2024	94.5	0.0	63.9	0.0	yes
Dec 2024	93.6	0.0	62.7	0.0	yes
Jan 2025	53.0	0.0	63.4	0.0	yes
Feb 2025	48.5	0.0	44.6	0.0	yes

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

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**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 3A Operating Hours	Turbine Engine 3B Operating Hours	Less than 5,000 hours for all combined Turbines?
TOTAL 2024	78.3	88.1	93.6	62.7	yes
YTD 2025	27.6	3.0	2.5	9.9	yes

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
Sept 2023	0.0 hrs	0.0 hrs	0.0 hrs	0.00 gal	
Oct 2023	0.0 hrs	0.0 hrs	0.0 hrs	0.00 gal	
Nov 2023	0.0 hrs	0.0 hrs	0.0 hrs	0.00 gal	
Dec 2023	0.0 hrs	0.0 hrs	0.0 hrs	0.00 gal	
Jan 2024	0.0 hrs	0.0 hrs	0.0 hrs	0.00 gal	
Feb 2024	0.0 hrs	0.0 hrs	0.0 hrs	0.00 gal	
Mar 2024	0.0 hrs	0.0 hrs	0.0 hrs	0.00 gal	
April 2024	0.0 hrs	0.0 hrs	0.0 hrs	0.00 gal	
May 2024	0.0 hrs	0.0 hrs	0.0 hrs	0.00 gal	
June 2024	0.0 hrs	0.0 hrs	0.0 hrs	0.00 gal	
July 2024	0.0 hrs	0.0 hrs	0.0 hrs	0.00 gal	
Aug 2024	0.0 hrs	0.0 hrs	0.0 hrs	0.00 gal	
<b>TOTAL</b>	<b>0.0 hrs</b>	<b>0.0 hrs</b>	<b>0.0 hrs</b>	<b>0.00 gal</b>	

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