

March 30, 2023

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

TV Tracking #: 698

1. RECEIVED IN
ENFORCEMENT: 03/30/2023

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, 2022 to February 28, 2023**. The Power Plant is located at 50 Martin Luther King Jr. Way, Oakland, CA 94607.

If you have any questions regarding this report, please contact Spencer Vartanian, Environmental Manager, of my staff at spencer.vartanian@vistracorp.com or Vince Dodge, Director of Environmental Compliance at vincent.dodge@vistracorp.com.

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

Sincerely,



Mike Batte
Managing Director
Moss Landing and Oakland Power Plants

Enclosures: 10 pages

cc: Michael Le

File OK 401.40.02

Electronic File: C:\VistraBox\Box\G Drive\EH&S Compliance\DUKE-PGE\REG\Vartanian\Oakland\Air\Reports\2023

**Major Facility Review Permit - Semiannual Monitoring Compliance Report
Oakland Power Plant - Facility #B1887
September 1, 2022 to February 28, 2023**

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 |
|---|---------------------------------|--|----------------------------------|---------------------------------|--------------------------|---|
| Table VII – A Applicable Limits and Compliance Monitoring Requirements, S1, S2, S5, & S6 | | | | | | |
| NO _x | BAAQMD 9-9-302.2 | 42 ppmv, dry @ 15% O ₂ | 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. Limit exceeded for S6 on 9/6/22-9/7/22 during governor's emergency proclamation for an extreme heat event. Reported on 9/8/23 |
| | BAAQMD 9-9-302.2 | 42 ppmv, dry @ 15% O ₂ | 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 ₂ , 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. Limit exceeded for S6 on 9/6/22-9/7/22 during governor's emergency proclamation for an extreme heat event. Reported on 9/8/23 |
| | BAAQMD condition #2571, part 3a | 75 ppmv, dry @ 15% O ₂ , 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. |

* 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 |
|---|---------------------------------|--|----------------------------------|---------------------------------|--------------------------------|---|
| | BAAQMD condition #2571, part 3b | 42 ppmv, dry @ 15% O ₂ , 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. Limit exceeded for S6 on 9/6/22-9/7/22 during governor's emergency proclamation for an extreme heat event. Reported on 9/8/23 |
| | BAAQMD condition #2571, part 3b | 42 ppmv, dry @ 15% O ₂ , 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 |
| Table VII – A Applicable Limits and Compliance Monitoring Requirements, S1, S2, S5, & S6 | | | | | | |
| SO ₂ | 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. |

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Major Facility Review Permit - Semiannual Monitoring Compliance Report
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September 1, 2022 to February 28, 2023

| Type of Limit* | Emission Limit Citation* | Emission Limit* | Monitoring Requirement Citation* | Monitoring Frequency (P/C/N)* | Monitoring Type* | Compliance Summary |
|---|--------------------------------|---|----------------------------------|---------------------------------|-------------------------|---|
| 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. |
| Table VII – A Applicable Limits and Compliance Monitoring Requirements, S1, S2, S5, & S6 | | | | | | |
| 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 2022 were 1676.6 hours. The total operating hours for the year 2023 as of 2/28/23 were 0.0 hours. |

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| Type of Limit* | Emission Limit Citation* | Emission Limit* | Monitoring Requirement Citation* | Monitoring Frequency (P/C/N)* | Monitoring Type* | Compliance Summary |
|--|--------------------------------|--|----------------------------------|-------------------------------|----------------------|--|
| 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. |
| Table VII – B Applicable Limits and Compliance Monitoring Requirements, S9: Wipe Cleaning | | | | | | |
| 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. |
| Table VII – C Applicable Limits and Compliance Monitoring Requirements, S-20: Emergency Standby Diesel Engine | | | | | | |
| 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 |
| Table VII – C Applicable Limits and Compliance Monitoring Requirements, S-20: Emergency Standby Diesel Engine | | | | | | |
| FP | BAAQMD 6-1-310 | 0.15 gr/dscf | | N | | n/a |
| SO ₂ | 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 |

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| Type of Limit* | Emission Limit Citation* | Emission Limit* | Monitoring Requirement Citation* | Monitoring Frequency (P/C/N)* | Monitoring Type* | Compliance Summary |
|--------------------|--------------------------|-----------------------------|----------------------------------|-------------------------------|-----------------------|---|
| 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 0.0 hours for reliability-related activities in 2022 . And 0.0 hours in 2023 as of 02/28/2023 . |
| | Condition 22820, part 1 | 20 hours in a calendar year | Condition 22820, part 3 | C | Totalizing hour meter | The emergency standby diesel engine operated 0.0 hours for reliability-related activities in 2022 . And 0.0 hours in 2023 as of 02/28/2023 . |

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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**Major Facility Review Permit - Semiannual Monitoring Compliance Report
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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, 01/23/18 . | 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 | 596.9 | No, >2 years, in compliance w/source test dated 07/21/2020 |
| 1B | 07/21/20 | 951.7 | No, >2 years, in compliance w/source test dated 07/21/2020 |
| 3A | 07/21/20 | 332.8 | No, >2 years, in compliance w/source test dated 07/21/2020 |
| 3B | 07/21/20 | 705.0 | No, >2 years, in compliance w/source test dated 07/21/2020 |

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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 | 418.5 | Yes – complies |
| 1B | 07/21/20 | 908.6 | Yes – complies |
| 3A | 07/23/20 | 309.8 | Yes – complies |
| 3B | 07/23/20 | 649.7 | 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? |
|----------------|--|--|--|--|---|
| March 2022 | 371.9 | 8.4 | 567.2 | 0.0 | yes |
| April 2022 | 371.8 | 8.4 | 730.5 | 0.0 | yes |
| May 2022 | 369.5 | 8.4 | 809.4 | 0.0 | yes |
| June 2022 | 359.5 | 8.4 | 867.5 | 0.0 | yes |
| July 2022 | 359.5 | 0.0 | 876.6 | 0.0 | yes |
| August 2022 | 349.9 | 0.0 | 876.8 | 0.0 | yes |
| September 2022 | 349.9 | 0.0 | 876.8 | 6.4 | yes |
| October 2022 | 193.2 | 0.0 | 685.6 | 6.4 | yes |
| November 2022 | 162.2 | 0.0 | 681.6 | 6.4 | yes |
| December 2022 | 162.2 | 0.0 | 682.2 | 6.4 | yes |
| January 2023 | 145.4 | 0.0 | 666.8 | 6.4 | yes |
| February 2023 | 0.0 | 0.0 | 513.8 | 6.4 | yes |

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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? |
|----------------|--|--|--|--|---|
| March 2022 | 47.2 | 0.2 | 338.7 | 2.1 | yes |
| April 2022 | 48.8 | 0.2 | 485.0 | 2.1 | yes |
| May 2022 | 99.8 | 0.2 | 517.1 | 2.1 | yes |
| June 2022 | 208.6 | 0.2 | 588.8 | 2.1 | yes |
| July 2022 | 216.9 | 0.0 | 589.9 | 0.0 | yes |
| August 2022 | 218.3 | 0.0 | 581.6 | 0.0 | yes |
| September 2022 | 224.1 | 5.6 | 596.5 | 5.7 | yes |
| October 2022 | 243.3 | 5.6 | 598.6 | 5.7 | yes |
| November 2022 | 214.8 | 5.6 | 598.6 | 5.7 | yes |
| December 2022 | 215.4 | 5.6 | 599.1 | 5.7 | yes |
| January 2023 | 215.4 | 5.6 | 585.7 | 5.7 | yes |
| February 2023 | 215.4 | 5.6 | 474.3 | 5.7 | yes |

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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 2022 | 162.2 | 688.6 | 221.0 | 604.8 | yes |
| YTD 2023 | 0.0 | 0.0 | 0.0 | 0.0 | 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 |
|----------------|--------------------------------|------------------------------|----------------|-----------------|---------------------|
| March 2022 | 0.0 hrs | 0.0 hrs | 0.0 hrs | 0.00 gal | |
| April 2022 | 0.0 hrs | 0.0 hrs | 0.0 hrs | 0.00 gal | |
| May 2022 | 0.0 hrs | 0.0 hrs | 0.0 hrs | 0.00 gal | |
| June 2022 | 0.0 hrs | 0.0 hrs | 0.0 hrs | 0.00 gal | |
| July 2022 | 0.0 hrs | 0.0 hrs | 0.0 hrs | 0.00 gal | |
| August 2022 | 0.0 hrs | 0.0 hrs | 0.0 hrs | 0.00 gal | |
| September 2022 | 0.0 hrs | 0.0 hrs | 0.0 hrs | 0.00 gal | |
| October 2022 | 0.0 hrs | 0.0 hrs | 0.0 hrs | 0.00 gal | |
| November 2022 | 0.0 hrs | 0.0 hrs | 0.0 hrs | 0.00 gal | |
| December 2022 | 0.0 hrs | 0.0 hrs | 0.0 hrs | 0.00 gal | |
| January 2023 | 0.0 hrs | 0.0 hrs | 0.0 hrs | 0.00 gal | |
| February 2023 | 0.0 hrs | 0.0 hrs | 0.0 hrs | 0.00 gal | |
| TOTAL | 0.0 hrs | 0.0 hrs | 0.0 hrs | 0.00 gal | |

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