

1. RECEIVED IN
ENFORCEMENT: 12/31/2024

September 30, 2024

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 **March 1, 2024 to August 31, 2024**. The Power Plant is located at 50 Martin Luther King Jr. Way, Oakland, CA 94607.

Should you have any questions or need additional information regarding this report please contact Mike Batte, Managing Director and Plant Manager at mike.batte@luminant.com or Peter Homnick, Director of Environmental Compliance at peter.homnick@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: 9 pages

cc: Michael Le

File OK 401.40.02

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Major Facility Review Permit - Semiannual Monitoring Compliance Report
Oakland Power Plant - Facility #B1887
March 1, 2024 to August 31, 2024

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.
	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.
	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.
	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.
	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

* 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
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.
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
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 2023 were 261.1 hours. The total operating hours for the year 2024 as of 8/31/24 were 292.3 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.
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

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Type of Limit*	Emission Limit Citation*	Emission Limit*	Monitoring Requirement Citation*	Monitoring Frequency (P/C/N)*	Monitoring Type*	Compliance Summary
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
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 2023 . And 0.0 hours in 2024 as of 8/31/2024 .
	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 2023 . And 0.0 hours in 2024 as of 8/31/2024 .

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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March 1, 2024 to August 31, 2024**

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	672.9	No, >2 years, in compliance w/source test dated 07/21/2020
1B	07/21/20	1169.4	No, >2 years, in compliance w/source test dated 07/21/2020
3A	07/21/20	446.9	No, >2 years, in compliance w/source test dated 07/21/2020
3B	07/21/20	850.6	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	494.2	Yes – complies
1B	07/21/20	1125.9	Yes – complies
3A	07/23/20	423.5	Yes – complies
3B	07/23/20	795.0	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?
Sept 2023	0.0	0.0	17.9	0.0	yes
Oct 2023	0.0	0.0	107.1	0.0	yes
Nov 2023	0.0	0.0	130.6	0.0	yes
Dec 2023	0.1	0.0	131.7	0.0	yes
Jan 2024	38.2	0.0	155.2	0.0	yes
Feb 2024	43.8	0.0	155.2	0.0	yes
Mar 2024	54.2	0.0	193.4	0.0	yes
April 2024	54.2	0.0	193.4	0.0	yes
May 2024	54.3	0.0	193.2	0.0	yes
June 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

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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?
Sept 2023	48.5	0.0	34.4	0.0	yes
Oct 2023	30.0	0.0	56.8	0.0	yes
Nov 2023	42.3	0.0	86.0	0.0	yes
Dec 2023	42.6	0.0	86.7	0.0	yes
Jan 2024	85.7	0.0	94.0	0.0	yes
Feb 2024	90.2	0.0	114.7	0.0	yes
Mar 2024	77.8	0.0	94.4	0.0	yes
April 2024	77.8	0.0	94.4	0.0	yes
May 2024	77.9	0.0	94.4	0.0	yes
June 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

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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 2023	0.1	131.7	42.6	86.7	yes
YTD 2024	75.9	86.0	71.5	58.9	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	
TOTAL	0.0 hrs	0.0 hrs	0.0 hrs	0.00 gal	

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