

Blue Lake Power LLC

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January 30, 2017

EES Case Management Unit

U.S. Department of Justice
Environment and Natural Resources Division
P.O. Box 7611
Washington, D.C. 20044-7611
Eescdcopy.enrd@usdoj.gov

Re: DJ # 90-5-2-1-11038

Re: United States et.al. v. Blue Lake Power, LLC, Semiannual Report

To Whom It May Concern:

In accordance with the requirements of Condition #43 of the Consent Decree, Blue Lake Power LLC hereby submits the attached semiannual report covering the period July 1 – December 31, 2016.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

A handwritten signature in blue ink that reads "David S. O'Neill".

David S. O'Neill
Attorney at Law
Manager of LandGas Technology LLC

Attachment

Cc: Brian Riedel, U.S. EPA, Region IX, Director, Enforcement Division (ENF-1), U.S. EPA, Region IX, Brian Wilson, Air Pollution Control Officer, North Coast AQMD
Nancy Diamond, District Counsel, North Coast AQMD, Jane E. Luckhardt, Day Carter & Murphy LLP, Blue Lake Power, LLC, Attn: Glenn Zane

Blue Lake Power LLC
Semiannual Report for the Period July 1 through December 31, 2016

1. Identify the progress of installation, including any and all dates of completed installation, of each control technology required for the Facility by this Consent Decree and describe any problems encountered or anticipated during such installation, together with implemented or proposed solutions.

No control technology has yet been installed for the Facility.

2. Completion of milestones.

The following milestones were completed during this reporting period:

CD #	Event	Deadline	Actual
33.a	Submit PM ₁₀ source test protocol	11/29/2016	11/1/2014
16.a.i	Submit certification that ESP has been repaired	Prior to 12/14/2016	10/4/2016
16.a.ii	Submit recommended ESP operating parameters (T/R voltages and currents and parameters from rapper control panel)	Prior to 12/14/2016	9/29/2016
16.a.iii	Confirm that employees have been trained in proper operation of ESP	Prior to 12/14/2016	10/4/2016
16.b	Operate ESP in accordance with recommended operating parameters until final approval of ESP optimization plan	12/14/2016	10/8/2016

3. Problems encountered or anticipated, together with proposed solutions.

BLP made several attempts to start the boiler in October but the attempts were unsuccessful. On October 26, BLP was able to start the boiler on propane and transition to wood fuel but before stable combustion could be achieved on biomass it was discovered that there was an issue that was preventing the boiler from getting the proper air/fuel mixture, so the boiler was taken offline and repairs made.

BLP made several additional attempts to start the boiler in November but the attempts were unsuccessful because of equipment malfunctions and poor weather. On November 21, BLP was able to restart the boiler but before stable combustion could be achieved on biomass issues with the steam system and fuel supply system were discovered, and the boiler was taken offline again.

Although repairs were completed by early December 2016, because of the unusually wet weather in December, BLP was unable to obtain sufficient high-quality biomass fuel to operate for any extended period of time on wood. As a result, BLP has not been able to complete either the ESP technical evaluation or the PM₁₀ stack test as anticipated. BLP has committed to notify the agencies in writing as soon as sufficient high-quality fuel has been obtained to restart operations and operate for six hours continuously on wood.

4. Status of permit applications.

No permit applications were prepared or filed during this reporting period.

5. All CEMS data collected for the Main Stack, reduced to 1-hour averages, in accordance with 40 C.F.R. § 60.13(h)(2) and in electronic format that can be manipulated with Microsoft Excel, including an explanation of any periods of CEMS downtime.

Hourly CEMS data collected during this reporting period is being provided in electronic format.

6. Identification of all periods, reduced to 1-hour periods, of Startup, Shutdown, and Malfunction of the Boiler.

Please see the attached summary table.

7. Identification of each period when the Boiler was operating in excess of one or more Emission Rates.

Not applicable. The CD does not include any Emission Limits that are applicable to the Boiler during this reporting period.

8. Identification of the magnitude of excess emissions during each period of excess emissions as computed in accordance with 40 C.F.R. § 60.13(h), including any conversion factors used.

Not applicable. The CD does not include any Emission Limits that are applicable to the Boiler during this reporting period.

9. If applicable and feasible, identification of the nature and cause of the Boiler malfunction during periods of excess emissions, corrective actions taken, or preventative measures adopted.

Not applicable. The CD does not include any Emission Limits that are applicable to the Boiler during this reporting period.

10. The date and time of each period during which the CEMS was inoperative except for zero and span checks and the nature of the system repairs or adjustments or a statement that there was no such period.

There were no periods of downtime for the NOx and CO CEMS during this reporting period.

Periods of Startup, Shutdown and Malfunction (Item 6)

Date	Start Propane	Stop Propane	Wood Start	Stop Wood	Malfunction/ Breakdown	1-Hour Periods
7-Oct-16	21:05	23:30	n/a	n/a	n/a	3 1-hour periods
8-Oct-16	9:25	17:40	n/a	n/a	n/a	9 1-hour periods
8-Oct-16	19:15	7:00	n/a	n/a	n/a	13 1-hour periods
9-Oct-16	8:53	12:45	n/a	n/a	n/a	4 1-hour periods
10-Oct-16	0:15	13:25	n/a	n/a	n/a	14 1-hour periods
21-Oct-16	16:18	n/a	n/a	n/a	n/a	15 1-hour periods
22-Oct-16	n/a	6:14	n/a	n/a	n/a	
26-Oct-16	1:15	15:30	n/a	n/a	15:30	15 1-hour periods
2-Nov-16	0:00	10:50	n/a	n/a	n/a	11 1-hour periods
17-Nov-16	16:08	23:50	n/a	n/a	n/a	8 1-hour periods
18-Nov-16	19:50	3:30	3:30	5:30	n/a	9 1-hour periods
19-Nov-16	14:55	19:37	n/a	n/a	n/a	6 1-hour periods
21-Nov-16	8:47	22:44	17:52	22:40	22:40	11 1-hour periods
13-Dec-16	6:00	19:00	16:47	23:45	23:45	12 1-hour periods