

February 15, 2018

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 ("BLP") hereby submits the attached semiannual report covering the period July 1 – December 31, 2017. BLP recognizes that this report is approximately two weeks overdue. BLP has undergone major personnel changes at the plant that contributed to this delay. BLP is instituting new controls to ensure that future reports are submitted by the applicable deadline. It is worth noting that the plant boiler did not operate during the just-concluded reporting period, and thus there was no substantive data to report for this reporting period.

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,



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
Bradley B. Johnson, Harrison Temblador Hungerford & Johnson
Blue Lake Power, LLC, Attn: Glenn Zane

Blue Lake Power LLC
Semiannual Report for the Period July 1 through December 31, 2017

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 been installed for the Facility.

2. Completion of milestones.

The following milestones were completed during this reporting period:

CD #	Event	Deadline	Actual
43.a	Submit semiannual report	7/30/17	7/14/17
34	Submit revised Fuel Management Plan	n/a	8/7/17 9/14/17 11/21/17
n/a	Submit notifications related to boiler restart date	n/a	7/14/17 9/13/17 9/15/17

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

The boiler has not yet been restarted. 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.

Not applicable. No CEMS data were collected because the Boiler did not operate during this semiannual period.

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

Not applicable. There were no periods of Startup, Shutdown, or Malfunction because the Boiler did not operate during this semiannual period.

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 were 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 were 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 were 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.

The NO_x and CO CEMS did not operate during this reporting period because the Boiler was shut down during the entire semiannual period.