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8 **BEFORE THE HEARING BOARD OF THE**
9 **SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

10 **In the Matter of**

11 COLTON POWER, LP – CENTURY [Facility ID
12 No. 182561]

13 Petitioner.

14 vs.

15 SOUTH COAST AIR QUALITY
16 MANAGEMENT DISTRICT.

17 Respondent.

CASE NO. 6167-4

**DECLARATION OF JOSEPH
SHEPHARD**

Hearing Date: January 11, 2024

Time: 9:30 a.m.

Place: Hearing Board
South Coast Air Quality
Management District
21865 Copley Drive
Diamond Bar, CA 91765

19
20 **I. DECLARATION OF JOSEPH SHEPHARD**

21 I, Joseph Shephard, declare as follows:

- 22 1. I am employed as the plant manager overseeing the maintenance and operations of the
23 Colton Power, LP-Century electric power generating facility (“Facility”). I am directly
24 employed by North America Energy Services (“NAES”), which is responsible for
25 operating the Facility. I either have first-hand knowledge of events or have reviewed
26 information and data related to this short variance, and I am competent to testify to the
27 facts set forth herein.
- 28 2. The Facility is an electricity generating plant utilizing four simple cycle 10.5-MW natural

1 gas fired combustion turbines. The Facility's main purpose is to provide electricity to the
2 City of Colton in times of peak demand.

3 3. In early September 2023, Facility management was reorganized, and new plant
4 management personnel were assigned operations and maintenance responsibilities for the
5 Facility. I began managing the Facility at this time as part of this reorganization. As part
6 of this transition, the Facility's management team has been implementing system
7 evaluations and performing maintenance where needed. I oversee personnel tasked with
8 directing all Operations and Maintenance activities at the plant. My responsibilities
9 include ensuring the safe and efficient operation of the Facility and ensuring that the plant
10 is operated in compliance with applicable safety, environmental, and power generating
11 requirements. This includes oversight of personnel that conduct air quality testing and
12 activities pursuant to the Facility's Title V Permit to Operate.

13 4. On December 7, 2023, Facility engineers attempted to operate Unit D15 to confirm it
14 would perform properly for the ammonia (NH₃) slip test. At that time, the engineers and
15 plant operators were unable to keep Unit D15 operating. The engineers and operators
16 attempted to complete repairs that day but were unable to do so.

17 5. From December 8th through December 12th, Facility staff set up data ports to enable
18 remote access into the unit for tuning. SISO Engineering, a controls engineering
19 company, assisted with the remote set up. On December 13th, the remote access was
20 tested. On December 14th, staff test ran the unit for remote testing from by an outside
21 contractor who specializes in the Facility's GE10 model turbines. During the test, the
22 unit faulted and tripped during several of the data collecting runs. A maximum of 2 MWs
23 was achieved and only for limited times. On December 14th, Colton Power engineers
24 again tried to fix Unit D15, but were still unable to keep the unit running. It was
25 determined that it would not be possible to run the unit during scheduled the ammonia
26 slip test.

27 6. South Coast Air Quality Management Rule 1134(e)(2)(C)(iii) states that ammonia slip
28 testing of natural gas fired turbines, such as the ones at the Facility, must be conducted by

1 the end of the calendar year. Condition D28.1 of the Facility's Permit to Operate
2 contains a similar condition. District testing standards require that the unit operate at
3 normal load. Historically, the Facility has conducted these tests at the end of the year.
4 However, Unit D15 cannot operate consistently for the length of time or load required for
5 testing, or to respond to a City of Colton dispatch demand.

- 6 7. An outside contractor has been scheduled to perform testing of the unit on January 9,
7 2024, and shall assess and attempt to repair the unit. The facility believes that the D15
8 can operate after the contractor assesses and calibrates the air fuel ratio settings on the
9 combustor.
- 10 8. The Facility expects to have the maintenance and repairs completed by the end of March
11 2024.
- 12 9. There are no excess emissions associated with the condition of Unit D15. D15 is
13 currently inoperable. As such, it is not causing the Facility to exceed any emission limit.
- 14 10. I have reviewed Health and Safety (H&S) Code Section 41700. The suspension of
15 operation of D15 pending repair and related delay of the ammonia slip test beyond the
16 2023 calendar year are not expected to result in a violation of H&S Code Section 41700.
- 17 11. Without a short variance, the Facility will be in violation of South Coast Air Quality
18 Management District rules due to the inability to adequately perform the annual ammonia
19 slip test for Unit D15, which was due prior to January 1, 2024.

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21 I declare under penalty of perjury under the laws of the State of California that the forgoing is
22 true and correct, and that this declaration was executed on January 4, 2024 in Tracy, California.

23
24 DATED: January 4, 2024

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27
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By: 

Joseph Shephard