



EMISSIONS COMPLIANCE STUDY

Performed At

**Kern Energy
Panama Lane Facility
60 MMBTU/HR Tulsa Process Heater
Bakersfield, CA**

Test Date

December 28, 2023

Report No.

TRC Environmental Corporation Report 583056

Report Submittal Date

January 4, 2024



Report Certification

I certify that to the best of my knowledge:

- Testing data and all corresponding information have been checked for accuracy and completeness.
- Sampling and analysis have been conducted in accordance with the approved protocol and applicable reference methods (as applicable).
- All deviations, method modifications, or sampling and analytical anomalies are summarized in the appropriate report narrative(s).

A handwritten signature in blue ink that reads "James McSweeney".

James McSweeney, QSTI
AMS Bakersfield Group Manager

January 3, 2024

Date

TRC was operating in conformance with the requirements of ASTM D7036-04 during this test program.

A handwritten signature in black ink that appears to read "BRR".

Bruce Randall
TRC Emission Testing Technical Director



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EMISSIONS COMPLIANCE STUDY

1.0 INTRODUCTION

TRC Environmental Corporation (TRC) performed an emissions compliance test program on the 60 MMBTU/HR Tulsa Process Heater at the Panama Lane Facility of Kern Energy in Bakersfield, CA on December 28, 2023. The tests were authorized by Tommy Landeros and performed for Kern Energy.

The purpose of this test program was to determine emissions of the pollutants specified in Section 2.0 during normal operating conditions. The results of the test program are used in order to determine compliance with San Joaquin Valley Air Pollution Control District (SJVAPCD, southern region) Authority to Construct number S-37-1-18. The test program was conducted according to the TRC Test Protocol number 583056P dated December 22, 2023.

1.1 Project Contact Information

Participants		
Test Facility	Kern Energy 7724 E. Panama Lane Bakersfield, CA 93307	Tommy Landeros Environmental Advisor (661) 623-9601 TLanderos@kernenergy.com
Air Emissions Testing Body (AETB)	TRC Environmental Corporation 2820 Pegasus Drive, Suite 1 Bakersfield, California 93308	James McSweeney, QSTI AMS Bakersfield Group Manager (661) 619-3130 (phone) JMcSweeney@trccompanies.com

The tests were conducted by Jeff Harris and Bobby Hull of TRC. Documentation of the on-site ASTM D7036-04 Qualified Individual (QI) can be located in the appendix to this report.

The source test was not attended by personnel of the SJVAPCD for observation.

1.2 Facility and Process Description

Kern Energy uses a 60 MMBtu/hr Tulsa Heaters Inc. Process Heater at their Panama Lane and Weedpatch Highway location in Bakersfield, California.

The Heater burners are Clearsign model Core Low NO_x burners. The heater was fired on refinery fuel gas.



2.0 SUMMARY OF RESULTS

The results of this test program are summarized in the table below. Detailed individual run results are presented in Section 6.0.

Parameter	Average Emissions	Permitted Emission Limits
	Tulsa Heater Inc. (THI)	
Nitrogen Oxides (NO _x as NO ₂)		
ppmvd @ 3% O ₂	8.41	9
lb/MMBtu	0.0102	0.011
Carbon Monoxide (CO) ¹		
ppmvd @ 3% O ₂	< 1.22	150
Non-Methane Non-Ethane Hydrocarbons (VOC ref. as Methane) ²		
lb/MMBtu	< 0.0002	0.0026

¹ "<" indicates CO concentration below the analytical detection limit, results calculated based on detection limit

² "<" indicates VOC concentration below the analytical detection limit, results calculated based on detection limit

The table below summarizes the test methods used, as well as the number and duration of each at the test location:

Parameter Measured	Analytical Approach	Test Method	No. of Runs	Run Duration
Oxygen/Carbon Dioxide (O ₂ /CO ₂)	Paramagnetic / NDIR	USEPA 3A	3	30 min.
Nitrogen Oxide (NO _x)	Chemiluminescence	USEPA 7E	3	30 min.
Carbon Monoxide (CO)	Gas filter correlation	USEPA 10	3	30 min.
Gaseous Organic Compounds (VOC ref. as Methane)	Gas Chromatography (GC) / Flame Ionization	USEPA 18	3	30 min.
F _d , HHV	Published and assumed values	USEPA 19 ASTM D-1945 ASTM D-3588	--	--

3.0 DISCUSSION OF RESULTS

No problems were encountered with the testing equipment during the test program. Source operation appeared normal during the entire test program. No changes or problems were encountered that required modification of any procedures presented in the test plan. No adverse test or environmental conditions were encountered during the conduct of this test program.

A stratification test was not conducted, previous stratification testing has showed that the Heater is not stratified. This is as per COM2030 Source Test Guidelines Condition IV, E. 4. A.



4.0 SAMPLING AND ANALYSIS PROCEDURES

All testing, sampling, analytical, and calibration procedures used for this test program were performed in accordance with the methods presented in the following sections. Where applicable, the Quality Assurance Handbook for Air Pollution Measurement Systems, Volume III, Stationary Source Specific Methods, USEPA 600/R-94/038c, September 1994 was used to supplement procedures.

4.1 Determination of the Concentration of Gaseous Pollutants Using a Multi-Pollutant Sampling System

Concentrations of the pollutants in the following sub-sections were determined using one sampling system. A single point at which the sample was collected was determined in accordance with SJVAPCD Source Testing Guidelines Section IV.E.4, Boilers and Process Heaters.

A straight-extractive sampling system was used. Moisture was removed from the gas stream by a two Peltier Effect cooled stainless steel impingers. In place of a paper strip chart recorder, screenshots of the data logger's integrated electronic chart were used. A data logger continuously recorded pollutant concentrations and generated one-minute averages of those concentrations. All calibrations and system checks were conducted using USEPA Protocol gases. Three-point linearity checks were performed prior to sampling, and in the event of a failing system bias or drift test (and subsequent corrective action). System bias and drift checks were performed using the low-level gas and either the high- or mid-level gas (as specified in the appendices) prior to and following each test run.

The Low Concentration Analyzers (those that routinely operate with a calibration span of less than 20 ppm) used by TRC are ambient-level analyzers. Per Section 3.12 of Method 7E, a Manufacturer's Stability Test is not required for ambient-level analyzers. Analyzer interference tests were conducted in accordance with the regulations in effect at the time that TRC placed an analyzer model in service.

4.1.1 CO₂ Determination by USEPA Method 3A

This method is applicable for the determination of CO₂ concentrations in controlled and uncontrolled emissions from stationary sources only when specified within the regulations. The CO₂ analyzer was equipped with a non-dispersive infrared (NDIR) detector.

4.1.2 O₂ Determination by USEPA Method 3A

This method is applicable for the determination of O₂ concentrations in controlled and uncontrolled emissions from stationary sources only when specified within the regulations. The O₂ analyzer was equipped with a paramagnetic-based detector.



4.1.3 NO_x Determination by USEPA Method 7E

This method is applicable for the determination of NO_x concentrations in controlled and uncontrolled emissions from stationary sources only when specified within the regulations. The NO_x analyzer utilized a photomultiplier tube to measure the linear and proportional luminescence caused by the reaction of nitric oxide and ozone.

4.1.4 CO Determination by USEPA Method 10

This method is applicable for the determination of CO concentrations in controlled and uncontrolled emissions from stationary sources only when specified within the regulations. The non-dispersive infrared analyzer (NDIR) CO analyzer was equipped with an internal gas correlation filter wheel, which eliminates potential detector interference. As such, use of an interference removal trap was not required.

4.2 Gaseous Organic Compound Determination by USEPA Method 18

This method is designed to measure gaseous organics emitted from an industrial source. This method will not determine compounds that (1) are polymeric (high molecular weight), (2) can polymerize before analysis, or (3) have very low vapor pressures at stack or instrument conditions.

An integrated sample of flue gas was collected in Tedlar® bags. The major organic components of the sample were separated by gas chromatography (GC) and individually quantified by flame ionization.

4.3 Fuel Factor Determination by ASTM D1945 & D1946

This method is used to collect refinery gas from the fuel line supply to an inline GC instrument using a modified Gas Processors Association (GPA) 2166-86 method for sampling of natural gas. Analysis is performed by ASTM D1945 and D5504 for F_d, HHV (GCV).

For analysis by ASTM D1945, components in a representative natural gas fuel sample are physically separated by GC and compared to calibration data obtained under identical operating conditions from a reference standard mixture of known composition. The numerous heavy end components of the sample are grouped into irregular peaks by reversing the direction of the carrier gas through the column at such time as to group the heavy ends either as C5 and heavier, C6 and heavier, or C7 and heavier. The composition of the sample is calculated by comparing either the peak heights, or the peak areas, or both, with the corresponding values obtained with the reference standard.



The analysis of a natural gas sample by ASTM 1946 is very similar to ASTM 1945. The components of hydrogen, oxygen, nitrogen, carbon monoxide, carbon dioxide, methane, ethane, and ethylene are determined by separation by gas chromatography (GC) and compared to calibration data obtained under identical operating conditions from a reference standard mixture of known composition.

ASTM D3588 calculates the heat value, compressibility factor, and relative density of the natural gas sample from the data provided by ASTM D1945 and D1946.

5.0 QUALITY ASSURANCE PROCEDURES

TRC integrates our Quality Management System (QMS) into every aspect of our testing service. We follow the procedures specified in current published versions of the test Method(s) referenced in this report. Any modifications or deviations are specifically identified in the body of the report. We routinely participate in independent, third-party audits of our activities, and maintain:

- Accreditation from the California Air Resources Board (CARB);
- Accreditation from the Stack Testing Accreditation Council (STAC) and the American Association for Laboratory Accreditation (A2LA) that our operations conform with the requirements of ASTM D 7036 as an Air Emission Testing Body (AETB).

These accreditations demonstrate that our systems for training, equipment maintenance and calibration, document control and project management will fully ensure that project objectives are achieved in a timely and efficient manner with a strict commitment to quality.

All calibrations are performed in accordance with the test Method(s) identified in this report. If a Method allows for more than one calibration approach, or if approved alternatives are available, the calibration documentation in the appendices specifies which approach was used. All measurement devices are calibrated or verified at set intervals against standards traceable to the National Institute of Standards and Technology (NIST). NIST traceability information is available upon request.

ASTM D7036-04 specifies that: *"AETBs shall have and shall apply procedures for estimating the uncertainty of measurement. Conformance with this section may be demonstrated by the use of approved test protocols for all tests. When such protocols are used, reference shall be made to published literature, when available, where estimates of uncertainty for test methods may be found."* TRC conforms with this section by using approved test protocols for all tests.



6.0 TEST RESULTS SUMMARY

Emissions Compliance Data Summary THI Heater Stack Outlet Panama Lane Facility December 28, 2023

Parameter	Run 1	Run 2	Run 3	Average	Emission Limits
Oxygen (O₂)					
%	6.16	6.25	6.24	6.22	--
Carbon Dioxide (CO₂)					
%	9.26	9.25	9.22	9.24	--
Nitrogen Oxides (NO_x as NO₂)					
ppmvd	6.88	6.79	7.04	6.90	--
ppmvd @ 3% O ₂	8.35	8.30	8.59	8.41	9
lb/MMBtu	0.0102	0.0101	0.0105	0.0102	0.011
Carbon Monoxide (CO)¹					
ppmvd	< 1.00	< 1.00	< 1.00	< 1.00	--
ppmvd @ 3% O ₂	< 1.21	< 1.22	< 1.22	< 1.22	150
Non-Methane Non-Ethane Hydrocarbons (VOC ref. as Methane)²					
ppmvd	< 0.34	< 0.34	< 0.34	< 0.34	--
ppmvd @ 3% O ₂	< 0.42	< 0.42	< 0.42	< 0.42	--
lb/MMBtu	< 0.0002	< 0.0002	< 0.0002	< 0.0002	0.0026

¹ "<" indicates CO concentration below the analytical detection limit, results calculated based on detection limit

² "<" indicates VOC concentration below the analytical detection limit, results calculated based on detection limit



**Fuel Gas Data Summary
THI Heater
Refinery Gas Line
Panama Lane Facility
December 28, 2023**

Parameter	Run 1	Run 2	Run 3	Average
Refinery Gas Data				
F-Factor _{dry} , dscf/MMBtu @ 68 °F	8,737	8,737	8,737	8,737
Fuel Gas Calorific Values				
GCV, BTU/lb	22,433	22,433	22,433	22,433
GCV, BTU/ft ³	1,638	1,638	1,638	1,638



APPENDIX



AETB and QI Information Summary

Facility Name:	Panama Lane Facility
Location:	THI Heater
Test Date:	December 28, 2023

Test Parameters:	USEPA Method 3A, 7E, 10, & 18	USEPA Method 18
QI Last Name:	Harris	McSweeney
QI First Name:	Jeff	Jim
QI Middle Initial:	S	E.
AETB Name:	TRC Environmental Corporation	TRC Environmental Corporation
AETB Phone No:	(661) 477-3267	(661) 399-1398
AETB Email:	JHarris@trccompanies.com	@TRCCompanies.com
Group 3 Exam Date:	December 8, 2023	September 22, 2021
Provider Name:	Source Evaluation Society	Source Evaluation Society
Provider Email:	gstiprogram@gmail.com	gstiprogram@gmail.com
Misc. Method Internal Exam Date:	January 15, 2021	January 28, 2021
Provider Name:	TRC Environmental Corporation	TRC Environmental Corporation
Provider Email:	EMackinnon@TRCCompanies.com	EMackinnon@TRCCompanies.com

Accredited Air Emission Testing Body

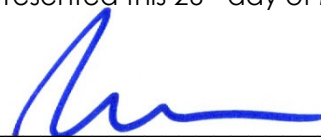
A2LA has accredited

TRC Environmental Corporation

In recognition of the successful completion of the joint A2LA and Stack Testing Accreditation Council (STAC) evaluation process, this laboratory is accredited to perform testing activities in compliance with ASTM D7036:2004 - Standard Practice for Competence of Air Emission Testing Bodies.



Presented this 26th day of May 2023

A blue ink signature of a person, likely the Vice President of Accreditation Services.

Vice President, Accreditation Services
For the Accreditation Council
Certificate Number 3711.01
Valid to May 31, 2025

This accreditation program is not included under the A2LA ILAC Mutual Recognition Arrangement.

December 19, 2023

Jim McSweeney
TRC
2820 Pegasus Drive, Suite 1
Bakersfield, California 93308
JMcSweeney@trccompanies.com

Dear Jim McSweeney:

I am pleased to inform you that the California Air Resources Board (CARB) has extended your approval, by means of enclosed Executive Order I-23-020 to perform CARB Test Methods 1, 2, 2A, 3, 4, 5, 20, and 100 (CO, CO₂, NO_x, O₂, SO₂, THC), Visible Emissions Evaluation, and U.S. Environmental Protection Agency Test Methods 18, 19 (determining the emission rate of NO_x, on an hourly basis, if the appropriate F factors can be determined from Table 19-2 of the method), 201A, 202, and 205. These approvals are valid through June 30, 2025, during which time additional audits of TRC's testing ability may be performed.

If you have questions or need further assistance, please contact the [Independent Contractor Program](#)¹.

Sincerely,

Walter Ham Digitally signed by Walter Ham
Date: 2023.12.20 12:56:58
-08'00'

Walter Ham, Ph.D., Chief, Monitoring and Laboratory Division

Enclosure

¹ icp@arb.ca.gov

This is to Certify that:

Jeffery Harris

Is a Qualified Individual as defined in Section 8.3 of ASTM D7036-04 for the following test methods:

EPA Methods 3A, 6C, 7E, 10, 10B, 19, 20, 25A.

CEM Performance Specifications PS2, PS3, PS4, PS4A, PS5, PS6, PS7, PS8, and PS15

The individual has met the minimum experience requirements defined in Section 8.3.4.2 of ASTM D7036-04 and has successfully passed a comprehensive examination for the test methods designated above.

This certification is effective until: 12-08-2028



Edward J MacKinnon
Air Measurements Practice Quality Manager

Date of Issue: 12-21-2023

Certificate Number: 02064



This certificate is the exclusive property of TRC and is non-transferable.

This is to Certify that:

Jeff Harris

Is a Qualified Individual as defined in Section 8.3 of ASTM D7036-04 for the following test methods:

EPA Method 18

The individual has met the minimum experience requirements defined in Section 8.3.4.2 of ASTM D7036-04 and has successfully passed an internal comprehensive examination for the test methods designated above.

This certification is effective until:

01-15-2026

Date of Issue:

01-18-2021

Certificate Number:

01628



Edward MacKinnon
Air Measurements Practice Quality Manager



This certificate is the exclusive property of TRC and is non-transferable.

This is to Certify that:
James McSweeney

Is a Qualified Individual as defined in Section 8.3 of ASTM D7036-04 for the following test methods:

EPA Methods 3A, 6C, 7E, 10, 10B, 19, 20, 25A.

CEM Performance Specifications PS2, PS3, PS4, PS4A, PS5, PS6, PS7, PS8, and PS15

The individual has met the minimum experience requirements defined in Section 8.3.4.2 of ASTM D7036-04 and has successfully passed a comprehensive examination for the test methods designated above.

This certification is effective until: 09-22-2026



Edward J MacKinnon
Air Measurements Practice Quality Manager

Date of Issue: 09-29-2021

Certificate Number: 01742



This certificate is the exclusive property of TRC and is non-transferable.

This is to Certify that:

James McSweeney

Is a Qualified Individual as defined in Section 8.3 of ASTM D7036-04 for the following test methods:

EPA Method 18

The individual has met the minimum experience requirements defined in Section 8.3.4.2 of ASTM D7036-04 and has successfully passed an internal comprehensive examination for the test methods designated above.

This certification is effective until:

01-28-2026

Date of Issue:

01-28-2021

Certificate Number:

01652



Edward MacKinnon
Air Measurements Practice Quality Manager



This certificate is the exclusive property of TRC and is non-transferable.

NOMENCLATURE

A_s = Cross-sectional area of stack (ft²)
 A_n = Cross-sectional area of nozzle (ft²)
 B_{ws} = Water vapor in the gas stream, proportion by volume (dimensionless)
 C_p = Pitot tube coefficient (dimensionless)
 dH = Average pressure differential across the orifice meter (inches of water)
 M_d = Dry molecular weight of stack gas (lb/lb-mole)
 M_s = Wet molecular weight of stack gas (lb/lb-mole)
 N = Normality of titrant (milliequivalents/ml)
 dP = Velocity pressure of stack gas (inches of water)
 P_b = Barometric pressure at sampling site (in. Hg)
 P_s = Absolute stack gas pressure (in. Hg)
 P_{std} = Standard absolute pressure (29.92 in. Hg)
 Q_s (std) = Dry volumetric stack gas flow rate, standard conditions (dscfm)
 T_s = Stack temperature (°F)
 V_m = Dry gas volume as measured by dry gas meter (dcf)
 V_m (std) = Dry gas volume as measured by dry gas meter, corrected to standard conditions (dscf)
 V_w (std) = Volume of water vapor in the gas stream, corrected to standard conditions (scf)
 V_{lc} = Volume of water vapor condensed in impingers and silica gel (ml)
 T (std) = Standard temperature (°F)
 T_m = Meter temperature (°F)
 $SQ.RT.dP$ = Square root of velocity pressure (dimensionless)
 y = Dry gas meter calibration factor (dimensionless)
 P_{static} = Static pressure of stack (in. H₂O)
 P_{stack} = Static pressure of stack (in. Hg)
 I = Isokinetic sample rate (percent)
 v_s = Average velocity of the stack gas (ft/sec)
 Q_s = Actual stack gas flow rate at stack conditions (ft³/min)
 Θ = Total sampling time (min)
 $\% O_2$ = Percent oxygen by volume (dry basis)
 $\% CO_2$ = Percent carbon dioxide by volume (dry basis)
 $\% CO$ = Percent carbon monoxide by volume (dry basis)
 $\% N_2$ = Percent nitrogen by volume (dry basis)
 Z_{cf} = Zero drift correction factor
 S_{cf} = Span drift correction factor
 C_z = Zero correction concentration
 MW = Molecular weight (lb/lb-mole)
 $ppmvd$ = parts per million by volume, dry
 $ppmvd @ X\% O_2$ = parts per million by volume, dry @ X% oxygen
 $lb/MMBtu$ = Emission concentration, pounds per million British thermal units
 $dscf/MMBtu$ = Fuel factor, dry standard cubic feet per million British thermal units
 gr/scf = Emission concentration, grains per standard cubic foot
 lb/hr = Emission rate, pounds per hour
 FHW = Front Half Wash of sampling train
 MF = Mass Filter of sampling train
 BHW = Back Half Wash of Sampling train
 $gr/dscf$ = Emission concentration, grains per dry standard cubic foot
 ng = Mass unit, nanograms



mg = Mass unit, milligrams

g = Mass unit, grams

ml = Unit of volume, milliliters

L = Unit of volume, liters

ul = Unit of volume, microliters

H₂SO₄ = Chemical formula, sulfuric acid

BaCl₂ = Chemical formula, barium chloride

NaOH = Chemical formula, sodium hydroxide

H₂S = Chemical formula, hydrogen sulfide

FHS = Front Half Sulfate of sampling train

BHS = Back Half Sulfate of sampling train

F-Factor = Fuel factor, volume of generated gases per unit of heat content (dscf/MMBtu)

°F = Degrees Fahrenheit

°R = Degrees Rankine

°C = Degrees Celsius

98.076 = Molecular weight of sulfuric acid

64.062 = Molecular weight of sulfur dioxide

46.006 = Molecular weight of nitrogen dioxide

28.010 = Molecular weight of carbon monoxide

60 = Conversion factor, minutes per hour

460 = Conversion factor, °F to °R

15.432 = Conversion factor, grains per gram

0.000143 = Conversion factor, pounds per grain

32/98.076 = Conversion factor, equivalent weight of SO₂ to MW of H₂SO₄

1.60982 = Ideal Gas Law (lb-mole x dscf/dscf/°R x mg)

0.00000137 = Ideal Gas Law (lb-mole x °R/ft³)

0.280 = Molecular weight of N₂ or CO, divided by 100

0.320 = Molecular weight of O₂, divided by 100

0.440 = Molecular weight of CO₂, divided by 100

18.0 = Molecular weight of H₂O

32.064 = Equivalent weight of SO₂

85.49 = Pitot tube constant, ft/sec x [(lb/lb-mole) x (in.Hg)/((°R) x (in.H₂O))] ^{0.5}

8.223E-05 = Ideal gas constant (1.37E-06 lb-mole °R/ft³) x (60 min/hr)



Reference Method Results Summary

Project Number:	583056	Start Date:	12/28/23
Customer:	Kern Energy	End Date:	12/28/23
Unit Identification:	THI Heater	Facility:	Panama Lane
Sample Location:	Stack Outlet	Recorded by:	Jeff Harris
RM Probe Type	Extractive (Dry)	Fc Factor:	-
Load Level/Condition:	Normal	Fd Factor:	8737

Reference Method Concentrations - As Measured Moisture Basis								
Run #	Date	Start Time	End Time	NOx ppmvd	SO2 ppmvd	CO ppmvd	CO2 % v/v dry	O2 % v/v dry
1	12/28/23	12:14	12:43	6.88	-	-0.03	9.26	6.16
2	12/28/23	12:58	13:27	6.79	-	-0.01	9.25	6.25
3	12/28/23	13:41	14:10	7.04	-	0.00	9.22	6.24
Average				6.90	-	-0.01	9.24	6.22

Moisture correction applied to "As Measured" data: None

Reference Method Pollutant Emission Rates*								
Run #	NOx lb/MMBtu	SO2 lb/MMBtu	CO lb/MMBtu	NOx lb/hr	SO2 lb/hr	CO lb/hr	Fc Factor	Fd Factor
1	0.0102	-	0.0000	-	-	-	-	8737
2	0.0101	-	0.0000	-	-	-	-	8737
3	0.0105	-	0.0000	-	-	-	-	8737
Average	0.0102	-	0.000	-	-	-	-	8737

* - lb/MMBtu based on measured concentrations and EPA F-Factor.

Reference Method Results Corrected to O ₂ Concentration			
Run #	NO _x ppmvd corrected to 3% Oxygen	SO ₂ ppmvd corrected to % Oxygen	CO ppmvd corrected to 3% Oxygen
1	8.35	-	-0.03
2	8.30	-	-0.02
3	8.59	-	0.00
Average	8.41	-	-0.01

Project Number: 583056
Client: Kern Energy
Facility: Panama Lane
Source: THI Heater
Test Date: 12/28/2023

	Run 1	Run 2	Run 3	Average
Time:	12:14 - 12:44	12:58 - 13:28	13:41 - 14:11	
O2 reporting basis (%vol dry):	3	3	3	3
Flue gas O2 concentration (% vol dry):	6.16	6.25	6.24	6.22
Fuel factor (Fd, dscf/MMBtu)	8,737	8,737	8,737	8,737
Standard temperature (°F):	68	68	68	68
Exhaust fractional moisture content (<i>Bws</i>) :	0.126	0.125	0.125	0.125
Hydrocarbon Species Concentration				
Methane (ppm wet)	0.30	< 0.10	0.30	< 0.23
Ethane (ppm wet)	< 0.10	< 0.10	< 0.10	< 0.10
Propane (ppm wet)	< 0.10	< 0.10	< 0.10	< 0.10
Non-Methane, Non-Ethane VOC Concentration				
As Methane (ppm wet)	< 0.3	< 0.3	< 0.3	< 0.3
As Methane (ppm dry)	< 0.34	< 0.34	< 0.34	< 0.34
As Methane @ 3 % Oxygen (ppm)	< 0.42	< 0.42	< 0.42	< 0.42
Non-Methane, Non-Ethane VOC Emission Rate				
As Methane (lb/MMBtu)	< 0.0002	< 0.0002	< 0.0002	< 0.0002

"<" indicates concentration below the analytical detection limit, results calculated based on detection limit

Example Calculations - Effluent Gas Concentration Determination

Project Number:	<u>583056</u>	Test Date:	<u>December 28, 2023</u>
Customer:	<u>Kern Energy</u>	Facility:	<u>Panama Lane</u>
Unit Identification:	<u>THI Heater</u>	Run #:	<u>1</u>
Sample Location:	<u>Stack Outlet</u>		

$$C_{\text{gas}} = (C - C_0) \times \frac{C_{\text{ma}}}{C_{\text{m}} - C_0}$$

Where:

C_{gas} = Effluent gas concentration (ppm or %vol)

C = Average gas concentration indicated by analyzer (ppm or %vol)

C_0 = Average of pre- and post-test system bias checks using low range gas (ppm or % vol)

C_{m} = Average of pre- and post-test system bias checks using upscale gas (ppm or % vol)

C_{ma} = Actual concentration of upscale gas (ppm or % vol)

NO_x	$C =$ <u>6.822</u> ppm	$C_0 =$ <u>0.093</u> ppm
	$C_{\text{m}} =$ <u>8.819</u> ppm	$C_{\text{ma}} =$ <u>8.920</u> ppm

$C_{\text{NOX}} =$ 6.878 ppm

CO	$C =$ <u>0.022</u> ppm	$C_0 =$ <u>0.048</u> ppm
	$C_{\text{m}} =$ <u>4.671</u> ppm	$C_{\text{ma}} =$ <u>4.550</u> ppm

$C_{\text{CO}} =$ -0.026 ppm

CO₂	$C =$ <u>9.113</u> %vol	$C_0 =$ <u>0.086</u> %vol
	$C_{\text{m}} =$ <u>10.941</u> %vol	$C_{\text{ma}} =$ <u>11.130</u> %vol

$C_{\text{CO2}} =$ 9.256 %vol

O₂	$C =$ <u>6.091</u> %vol	$C_0 =$ <u>0.002</u> %vol
	$C_{\text{m}} =$ <u>11.019</u> %vol	$C_{\text{ma}} =$ <u>11.140</u> %vol

$C_{\text{O2}} =$ 6.157 %vol

Note: Interim results are not rounded.



Example Calculations - Pollutant Concentration Corrected to a Reference % Oxygen

Project Number:	583056	Test Date:	December 28, 2023
Customer:	Kern Energy	Facility:	Panama Lane
Unit Identification:	THI Heater	Run #:	1

$$C_{\text{gas @ Reference \%O}_2} = C_{\text{gas}} \times \frac{(20.9 - \text{Ref \%O}_2)}{(20.9 - \%O_2)}$$

Where:

C_{gas} = Effluent gas pollutant concentration (ppm)

%O₂ = Effluent gas Oxygen concentration (ppm or %vol)

20.9 = Concentration of Oxygen in ambient air (%vol)

Ref %O₂ = Reference Oxygen concentration

NO_x	$C_{\text{gas}} =$	6.878	ppmvd	% O ₂ =	6.157	% v/v dry
	Ref %O ₂ =	3				

C_{NOX} @ Ref %O₂ = 8.35 ppmvd

CO	$C_{\text{gas}} =$	-0.026	ppmvd	% O ₂ =	6.157	% v/v dry
	Ref %O ₂ =	3				

C_{CO} @ Ref %O₂ = 0.00 ppmvd

Note: Interim results are not rounded.

Example Calculations - Pollutant Emission Rate, Oxygen-Based Fuel Factor

Project Number:	583056	Test Date:	December 28, 2023
Customer:	Kern Energy	Facility:	Panama Lane
Unit Identification:	THI Heater	Run #:	1

ER = Pollutant emission rate (lb/MMBtu)

C_{gas} = Pollutant concentration (ppm dry basis)

MW = Pollutant molecular weight (gr/gr-mole)

F_d = Oxygen-based fuel factor (dscf/MMBtu)

%O₂ = Concentration of oxygen in effluent gas (%vol dry basis)

1.194E-07 = Conversion constant for NOx. From Table 19-1 of Method 19, 40CFR, Appendix A

7.269E-08 = Conversion constant for CO. Derived based on Table 19-1 of Method 19, 40CFR60, App. A

For NOx $ER = C_{gas} \times 1.194E-07 \times F_d \times (20.9/(20.9-\%O_2))$

NOx	C _{gas} =	6.878 ppm	%O ₂ =	6.157 %vol
	F _d =	8737 dscf/MMBtu		

ER_{NOx} = 0.0102 lb/MMBtu

For CO $ER = C_{gas} \times 7.269E-08 \times F_d \times (20.9/(20.9-\%O_2))$

CO	C _{gas} =	-0.0260 ppm	%O ₂ =	6.157 %vol
	F _d =	8737 dscf/MMBtu		

ER_{CO} = 0.0000 lb/MMBtu

Note: Interim results are not rounded.



Project Number: 583056
Client: Kern Energy
Facility: Panama Lane

Source: THI Heater
Test Date: 12/28/2023
Run #: 1

Example Calculations - Non-Methane, Non-Ethane VOC concentration as methane

$$\text{NMNEVOC as CH}_4 = (3/4 \times \text{CC}_3\text{H}_8) + (4/4 \times \text{CC}_4\text{H}_{10}) + (5/4 \times \text{CC}_5\text{H}_{12}) + (6/4 \times \text{CC}_6\text{H}_{14})$$

NMNEVOC as CH₄ = Non-Methane, Non-EthaneVOC concentration as methane (ppm, wet basis)

C_{C₃H₈} = flue gas propane concentration (ppm, wet basis)

C_{C₄H₁₀} = flue gas butane concentration (ppm, wet basis)

C_{C₅H₁₂} = flue gas pentane concentration (ppm, wet basis)

C_{C₆H₁₄} = flue gas hexane concentration (ppm, wet basis)

$$\text{NMNEVOC as CH}_4 = (3 \times 0.1) + (4 \times 0) + (5 \times 0) + (6 \times 0)$$

$$\text{NMNEVOC as CH}_4 = 0.3 \text{ ppm, wet basis}$$

Example Calculations - VOC concentration corrected to dry basis

$$\text{VOC as CxHy (dry)} = \frac{\text{VOC as CxHy}}{(1 - \text{Bws})}$$

VOC as CxHy = VOC concentration (T, NM or NMNE; as Methane, Propane or Butane; ppm, wet basis)

Bws = fractional exhaust gas moisture content

Example for: Total VOC as Methane - Run 1

$$\text{TVOC as CH}_4 \text{ (dry)} = \frac{0.8}{(1 - 0.126)}$$

$$\text{TVOC as CH}_4 \text{ (dry)} = 0.9 \text{ ppm, dry basis}$$

Example Calculations - VOC concentration corrected to 3% O₂

$$\text{VOC as CxHy @ 3\% O}_2 = \text{VOC as CxHy (dry)} \times \frac{(20.9 - 3)}{(20.9 - \% \text{O}_2)}$$

VOC as CxHy = VOC concentration (T, NM or NMNE; as Methane, Propane or Butane; ppm, wet basis)

Bws = fractional exhaust gas moisture content

% O₂ = flue gas oxygen concentration (% vol, dry basis)

Example for: Total VOC as Methane - Run 1

$$\text{TVOC as CH}_4 \text{ @ 3\% O}_2 = 0.9 \times \frac{(20.9 - 3)}{(20.9 - 6.157)}$$

$$\text{TVOC as CH}_4 \text{ @ 3\% O}_2 = 1.0 \text{ ppm}$$



Project Number: 583056
Client: Kern Energy
Facility: Panama Lane

Source: THI Heater
Test Date: 12/28/2023
Run #: 1

Example Calculations - VOC emission rate, pounds per unit heat input

$$ER2 = \text{VOC as CxHy (dry)} \times MW \times Fd \times K \times 20.9 / (20.9 - \%O2)$$

ER2 = VOC emission rate (T, NM or NMNE; as methane, propane or butane; lb/MMBtu)

VOC as CxHy = VOC concentration as (T, NM or NMNE; as methane, propane or butane; ppm, dry basis)

MW = Reporting basis Molecular Weight (gr/gr-mole):
16.04 for Methane (CH₄)
44.1 for Propane (C₃H₈)
58.12 for Butane (C₄H₁₀)

Fd = EPA Method 19 fuel O₂-based fuel factor (dscf/MMBtu)

K = conversion constant:
2.639 E-09 @ 60 deg F
2.595 E-09 @ 68 deg F
2.585 E-09 @ 70 deg F

% O₂ = flue gas oxygen concentration (% vol, dry basis)

Example for: Total VOC as Methane at standard temperature of 68 deg F, Run 1:

$$ER2 = \frac{0.9}{100} \times 16.04 \times \frac{8737}{100000} \times \frac{2.595E-09}{1} \times \frac{20.9}{(20.9 - 6.157)}$$

ER2 = 0.000 lb/MMBtu as methane

EPA Method 18 Example Calculations

Project Number:	583056.0000	Test Date:	12/28/2023
Company:	Kern Energy	Run #:	1
Facility:	Panama Lane		
Unit/Location:	THI Heater		

Methane Calibration Standard Concentrations and Gas Chromatograph Responses

C ₁ = Low concn. std. (ppmv)	R ₁ = 3 Inj Avg Low GC Response (area counts)
C ₂ = Mid concn. std.(ppmv)	R ₂ = 3 Inj Avg Mid GC Response (area counts)
C ₃ = High concn. Std.(ppmv)	R ₃ = 3 Inj Avg High GC Response (area counts)
 C ₁ = <u>4.99</u> ppmv	 R ₁ = <u>20.78</u> area counts
C ₂ = <u>15</u> ppmv	R ₂ = <u>63</u> area counts
C ₃ = <u>50.1</u> ppmv	R ₃ = <u>211.41</u> area counts

Linear Regression Analysis

	(X)	(Y)	(X ²)	(Y ²)	(XY)	(x-Ax) ²	(y-Ay) ²
	0	0	0	0	0	307.0380063	5446.071006
	4.99	20.78	24.9001	431.8084	103.6922	157.0635563	2810.855306
	15	63	225	3969	945	6.36300625	116.5860063
	50.1	211.41	2510.01	44694.1881	10591.641	1061.293506	18937.20016
	(Σx)	(Σy)	(Σx ²)	(Σy ²)	(Σxy)	(Σ(x-Ax) ²)	(Σ(y-Ay) ²)
Sum =	70.09	295.19	2759.9101	49094.9965	11640.3332	1531.758075	27310.71248
	(Ax)	(Ay)	(Ax ²)	(Ay ²)			
Average =	17.5225	73.7975	689.977525	12273.74913			

Where:

X = Calibration Standard (ppmv)
 Y = GC Response (area counts)
 (Σx) = sum of x values
 (Σy) = sum of y values
 (Σx²) = sum of x² values
 (Σy²) = sum of y² values
 (Σxy) = sum of product of x and y values
 (Ax) = average of x values
 (Ay) = average of y values
 (Ax²) = average of x² values
 (Ay²) = average of y² values

EPA Method 18 Example Calculations (Cont.)

Project Number: 583056.0000
Company: Kern Energy
Facility: Panama Lane
Unit/Location: THI Heater

Test Date: 12/28/2023
Run #: 1

Linear Regression - Slope (Forced Through Origin)

$$M = \frac{\sum xy}{\sum x^2}$$

Where:

M = Slope

n = number of calibration data sets

$$(\sum xy) = \underline{11640.3332} \quad (\sum x^2) = \underline{2759.9101}$$

$$M = \underline{4.218}$$

Linear Regression - Coefficient of Determination R²

$$R^2 = \frac{((n * \sum xy) - (\sum x * \sum y))^2}{(n * \sum x^2 - (\sum x)^2) (n * \sum y^2 - (\sum y)^2)}$$

Where:

R² = Coefficient of Determination

$$\begin{array}{ll} (\sum xy) = \underline{11640.3332} & (\sum x^2) = \underline{2759.9101} \\ (\sum x) = \underline{70.09} & (\sum y^2) = \underline{49094.9965} \\ (\sum y) = \underline{295.19} & n = \underline{4} \end{array}$$

$$R^2 = \underline{1.0000}$$

EPA Method 18 Example Calculations (Cont.)

Project Number: 583056.0000
Company: Kern Energy
Facility: Panama Lane
Unit/Location: THI Heater

Test Date: 12/28/2023
Run #: 1

Methane Concentration Calculation

$$\text{Methane Concentration} = \frac{R_c}{M}$$

Where:

R_c = 3 Inj Avg Methane GC Response (area counts)

M = slope of GC response vs concentration

$$R_c = 1.15 \qquad M = 4.218$$

$$\text{Methane Concentration} = 0.3$$



Instrumental Reference Method Field Data

Project Number: 583056
Customer: Kern Energy
Unit Identification: THI Heater
Sample Location: Stack Outlet
Load Level/Condition: Normal

Start Date: 12/28/2023
Facility: Panama Lane
Recorded by: Jeff Harris
Fc Factor: -
Fd Factor: 8737

RM Analyzer Information			
Reference Method Probe Type (Moisture Basis):			Extractive (Dry)
Pollutant	Manufacturer	Model #	Serial Number
NO _x	Teledyne	T200H	822
CO	Teledyne	T300	137
CO ₂	California Analytical	702LX	2203041
O ₂	California Analytical	702LX	2203041

583056 Kern Energy Test 1 Configuration Summary
Configuration Sum 583056 Kern Energy Test 1

File & Test Information:

Path C:\Users\Admin\Documents\ProRATA Data\Panama Lane Facility\583056 Kern Energy Test 1\583056 Kern Energy Test 1.prc
Test 583056 Kern Energy Test 1 at Panama Lane Facility : Stack Outlet
Source ID THI Heater
Operator Jeff Harris

Test Properties:

Run Length 30 min
Response Time System: 1.5 min Direct: 0 min
Stability Less than 2% change over 0.5 minutes.
Traversing Off

Channels:

#	Channel	Units	Method	Range Val	Range Volts	Zero V	Span
1	O2	%	EPA 7E	25	5	0	21.54
2	CO2	%	EPA 7E	25	5	0	22.07
3	NOx	ppm	EPA 7E	25	5	0	21.33
4	CO	ppm	EPA 7E	10	5	0	8.57

Cylinders:

Valve#	Cylinder ID	Expiration	Contents
1	CC146489	12/28/2031	0% O2 0% CO2 0 ppm NOx
2	CC65982	6/30/2031	21.54% O2 22.07% CO2
3	ALM036586	7/27/2031	11.14% O2 11.13% CO2 0 ppm CO
4			
5	EB0061497	11/30/2025	20.89 ppm CO 21.33 ppm NOx
6	CC503450	2/22/2024	8.3 NO2
7			
8	DT0022596	12/2/2024	8.57 ppm CO 8.92 ppm NOx
9	DT0045374	11/17/2026	4.55 ppm CO 4.42 ppm NOx

Default References:

Channel	Zero	Low	Mid	High
O2	0.00 % : cyl 1		11.14 % : cyl 3	21.54 % : cyl 2
CO2	0.00 % : cyl 1		11.13 % : cyl 3	22.07 % : cyl 2
NOx	0.00 ppm : cyl 1		8.92 ppm : cyl 8	21.33 ppm : cyl 5
CO	0.00 ppm : cyl 3		4.55 ppm : cyl 9	8.57 ppm : cyl 8

Run averages corrected for bias

Operator: Jeff Harris

Plant Name: Panama Lane Facility

Location: Stack Outlet

Run	Date	Start Time	End Time	O2 %	CO2 %	NOx ppm	CO ppm
1	12/28/2023	12:14:00	12:44:00	6.157	9.256	6.878	-0.026
2	12/28/2023	12:58:00	13:28:00	6.25	9.246	6.791	-0.013
3	12/28/2023	13:41:00	14:11:00	6.24	9.223	7.037	0.004

583056 Kern Energy Test 1 Initial Calibration Error Test

583056 Kern Energy Test 1

Initial Calibration Error Test

Date/Time: 12/28/2023 11:28:44

Result: PASS

Operator: Jeff Harris

Plant: Panama Lane Facility

Location: Stack Outlet

Source ID: THI Heater

Reference Cylinder IDs

	Zero ID:	Low ID:	Mid ID:	High ID:
O2	CC146489		ALM036586	CC65982
CO2	CC146489		ALM036586	CC65982
NOx	CC146489		DT0022596	EB0061497
CO	ALM036586		DT0045374	DT0022596

Calibration Error Results

Channel:	O2	CO2	NOx	CO
Units:	%	%	ppm	ppm
Span:	21.54	22.07	21.33	8.57
Range:	25	25	25	10
Method:	EPA 7E	EPA 7E	EPA 7E	EPA 7E

Zero Ref:	0	0	0	0
Zero Cal:	-0.02	-0.026	0.051	-0.002
Zero Error:	-0.10%	-0.10%	0.20%	0.00%

Low Ref:

Low Cal:

Low Error:

Mid Ref:	11.14	11.13	8.92	4.55
Mid Cal:	11.133	11.13	8.784	4.698
Mid Error:	0.00%	0.00%	-0.60%	1.70%

High Ref:	21.54	22.07	21.33	8.57
High Cal:	21.571	22.107	21.309	8.598
High Error:	0.10%	0.20%	-0.10%	0.30%

Cal Result:	PASSED	PASSED	PASSED	PASSED
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583056 Kern Energy Test 1 Initial NOX CE Test

583056 Kern Energy Test 1

Initial NOX CE Test

Date/Time: 12/28/2023 11:34:41

Result: PASS

Operator: Jeff Harris

Plant: Panama Lane Facility

Location: Stack Outlet

Source ID: THI Heater

Reference Cylinder IDs

	NOx (NO2) ID
NOx	CC503450

NOx Converter Efficiency Results

Channel: NOx

Units: ppm

Span: 21.33

Range: 25

Method: EPA 7E

NOx Ref: 8.3

NOx Cal: 7.915

NOx Error: -4.60%

Cal Result: PASSED

583056 Kern Energy Test 1 Initial System Bias Check

583056 Kern Energy Test 1

Initial System Bias Check

Date/Time: 12/28/2023 11:52:46

Result: PASS

Operator: Jeff Harris

Plant: Panama Lane Facility

Location: Stack Outlet

Source ID: THI Heater

Reference Cylinder IDs

	Low ID	Upscale ID	Span ID
O2	CC146489	ALM036586	CC65982
CO2	CC146489	ALM036586	CC65982
NOx	CC146489	DT0022596	EB0061497
CO	ALM036586	DT0045374	DT0022596

System Bias Check Results

Analyte:	O2	CO2	NOx	CO
Units:	%	%	ppm	ppm
Span:	21.54	22.07	21.33	8.57
Range:	25	25	25	10
Method:	EPA 7E	EPA 7E	EPA 7E	EPA 7E
Low Cal:	-0.02	-0.026	0.051	-0.002
Low Sys:	0.006	0.096	0.07	0.054
Low Bias:	0.10%	0.60%	0.10%	0.70%
Upscale Cal:	11.133	11.13	8.784	4.698
Upscale Sys:	11.03	11.039	8.789	4.701
Upscale Bias	-0.50%	-0.40%	0.00%	0.00%
Bias Result:	PASSED	PASSED	PASSED	PASSED

583056 Kern Energy Test 1 Response Time

Response Time 583056 Kern Energy Test 1

Date/Time: 12/28/2023 12:01:36

Operator: Jeff Harris
 Plant: Panama Lane Facility
 Location: Stack Outlet
 Source ID: THI Heater

Response Time Results

Analyte:	O2		CO2		NOx		CO	
Units:	%		%		ppm		ppm	
Span:	21.54		22.07		21.33		8.57	
Range:	25		25		25		10	
Method:	EPA 7E		EPA 7E		EPA 7E		EPA 7E	
Upscale Lvl:	10.479		10.487		8.289		4.201	
Dnscale Lvl:	1.077		1.104		1.067		0.5	
Upscale (s):	0:37		0:36		1:15		1:22	
Dnscale (s):	0:35		0:35		1:06		1:35	
	Upscale	Dnscale	Upscale	Dnscale	Upscale	Dnscale	Upscale	Dnscale
	0.002	10.879	0.085	10.871	0.075	8.691	1.568	4.422
	0.003	10.909	0.085	10.897	0.069	8.667	1.487	4.444
	0.004	10.932	0.085	10.917	0.069	8.665	1.412	4.455
	0.002	10.951	0.085	10.933	0.073	8.696	1.341	4.481
	0.002	10.961	0.085	10.947	0.074	8.719	1.253	4.494
	0.004	10.976	0.085	10.952	0.057	8.706	1.209	4.492
	0.004	10.983	0.085	10.957	0.054	8.71	1.185	4.487
	0.004	10.991	0.085	10.96	0.057	8.717	1.114	4.501
	0.004	10.996	0.085	10.963	0.06	8.699	1.06	4.527
	0.003	11.001	0.085	10.968	0.074	8.696	1	4.532
	0.002	11.007	0.085	10.971	0.07	8.747	0.969	4.54
	0.002	11.008	0.085	10.975	0.058	8.76	0.895	4.553
	0.004	11.01	0.085	10.977	0.066	8.765	0.863	4.592
	0.003	11.012	0.085	10.979	0.076	8.755	0.825	4.6
	0.002	11.013	0.085	10.98	0.059	8.75	0.812	4.604
	0.002	11.016	0.084	10.981	0.064	8.751	0.771	4.606
	0.002	11.02	0.084	10.983	0.064	8.754	0.748	4.606
	0.002	11.021	0.085	10.985	0.058	8.759	0.728	4.597
	0.002	11.022	0.085	10.988	0.066	8.755	0.705	4.597
	0.002	11.022	0.085	10.989	0.066	8.748	0.685	4.612
	0.003	11.024	0.085	10.99	0.083	8.753	0.655	4.619
	0.039	11.02	0.086	10.99	0.064	8.767	0.632	4.612
	0.387	10.801	0.091	10.981	0.061	8.762	0.629	4.604
	1.183	9.907	0.112	10.938	0.063	8.765	0.62	4.609
	2.557	8.329	0.883	9.63	0.072	8.753	0.615	4.604
	4.168	6.895	3.793	6.806	0.059	8.751	0.625	4.571
	5.453	5.477	5.37	5.386	0.062	8.766	0.643	4.547
	6.687	4.299	6.493	4.206	0.06	8.75	0.656	4.536
	7.542	3.391	7.546	3.306	0.067	8.743	0.652	4.522
	8.171	2.663	8.348	2.626	0.067	8.759	0.68	4.486
	8.768	2.126	8.913	2.09	0.057	8.765	0.704	4.454
	9.26	1.661	9.415	1.718	0.053	8.762	0.738	4.397
	9.661	1.346	9.743	1.362	0.061	8.762	0.773	4.382
	9.946	1.11	10.037	1.127	0.07	8.762	0.81	4.311
	10.15	0.942	10.228	0.903	0.055	8.752	0.897	4.262
	10.295		10.4		0.058	8.755	0.947	4.157
	10.455		10.529		0.074	8.772	1	4.107
	10.582				0.072	8.775	1.077	3.973
					0.061	8.78	1.154	3.899
					0.067	8.796	1.235	3.79
					0.081	8.781	1.286	3.72

0.079	8.781	1.392	3.646
0.063	8.783	1.48	3.511
1.438	8.775	1.598	3.429
1.712	7.501	1.667	3.325
1.718	7.454	1.821	3.234
1.715	7.453	1.892	3.114
1.713	7.474	1.957	3.001
1.713	7.474	2.076	2.917
2.328	7.458	2.14	2.786
3.941	7.449	2.281	2.72
5.584	7.449	2.343	2.576
5.579	7.451	2.454	2.514
5.569	7.462	2.535	2.349
5.567	7.469	2.655	2.278
5.569	7.467	2.725	2.219
5.571	6.595	2.82	2.114
5.569	3.549	2.899	2.042
5.571	3.545	2.985	1.925
5.582	3.546	3.071	1.861
5.584	3.556	3.11	1.778
5.582	3.549	3.18	1.706
5.585	3.543	3.273	1.617
5.58	3.566	3.316	1.543
7.753	3.554	3.416	1.493
8.198	0.908	3.465	1.422
8.21		3.577	1.358
8.201		3.619	1.307
8.193		3.686	1.28
8.203		3.735	1.255
8.214		3.817	1.187
8.208		3.854	1.148
8.204		3.901	1.096
8.195		3.945	1.056
8.216		3.988	0.977
8.631		4.018	0.949
		4.044	0.909
		4.079	0.881
		4.125	0.825
		4.146	0.806
		4.175	0.771
		4.19	0.747
		4.253	0.727
			0.699
			0.681
			0.654
			0.622
			0.598
			0.588
			0.579
			0.546
			0.525
			0.509
			0.501
			0.477

583056 Kern Energy Test 1 Test Run 1_full

583056 Kern Energy Test 1

Test Run 1

Start: 12/28/2023 12:14:00

End: 12/28/2023 12:44:00

Operator: Jeff Harris

Plant: Panama Lane Facility

Location: Stack Outlet

Source ID: THI Heater

Time	Entry	O2 %	CO2 %	NOx ppm	CO ppm
12:14:00	Test Started				
12:14:59	1min avg:		6.122	9.134	6.65
12:15:59	1min avg:		6.077	9.164	6.752
12:16:59	1min avg:		6.094	9.159	6.826
12:17:59	1min avg:		6.079	9.154	6.794
12:18:59	1min avg:		6.075	9.155	6.828
12:19:59	1min avg:		6.101	9.135	6.79
12:20:59	1min avg:		6.183	9.085	6.731
12:21:59	1min avg:		6.265	9.02	6.638
12:22:59	1min avg:		6.236	9.029	6.564
12:23:59	1min avg:		6.167	9.06	6.51
12:24:59	1min avg:		6.152	9.08	6.662
12:25:59	1min avg:		6.105	9.103	6.716
12:26:59	1min avg:		6.115	9.106	6.727
12:27:59	1min avg:		6.138	9.093	6.729
12:28:59	1min avg:		6.03	9.129	6.728
12:29:59	1min avg:		6.024	9.159	7.024
12:30:59	1min avg:		6.01	9.158	7.044
12:31:59	1min avg:		6.1	9.113	6.988
12:32:59	1min avg:		6.093	9.106	6.822
12:33:59	1min avg:		6.072	9.115	6.837
12:34:59	1min avg:		6.059	9.121	6.85
12:35:59	1min avg:		6.04	9.134	6.891
12:36:59	1min avg:		6.005	9.154	6.981
12:37:59	1min avg:		6.094	9.116	6.984
12:38:59	1min avg:		6.112	9.081	6.79
12:39:59	1min avg:		5.81	9.236	6.898
12:40:59	1min avg:		5.795	9.304	7.537
12:41:59	1min avg:		6.101	9.118	7.337
12:42:59	1min avg:		6.359	8.925	6.744
12:43:59	1min avg:		6.116	8.946	6.286
12:44:00	Sampling Finished				
12:44:00	Test Complete				
12:44:00	Test Avgs:		6.091	9.113	6.822

583056 Kern Energy Test 1 Run 1 Final Bias & Drift Check

583056 Kern Energy Test 1 Run 1

Run 1 Final Bias & Drift Check

Date/Time: 12/28/2023 12:54:11

Result: PASS

Operator: Jeff Harris
Plant: Panama Lane Facility
Location: Stack Outlet
Source ID: THI Heater

Reference Cylinder IDs

	Low ID	Upscale ID	Span ID
O2	CC146489	ALM036586	CC65982
CO2	CC146489	ALM036586	CC65982
NOx	CC146489	DT0022596	EB0061497
CO	ALM036586	DT0045374	DT0022596

System Bias Check Results

Analyte:	O2	CO2	NOx	CO
Units:	%	%	ppm	ppm
Span:	21.54	22.07	21.33	8.57
Range:	25	25	25	10
Method:	EPA 7E	EPA 7E	EPA 7E	EPA 7E
Low Cal:	-0.02	-0.026	0.051	-0.002
Low Sys:	-0.001	0.077	0.117	0.042
Low Bias:	0.10%	0.50%	0.30%	0.50%
Upscale Cal:	11.133	11.13	8.784	4.698
Upscale Sys:	11.007	10.843	8.849	4.641
Upscale Bias	-0.60%	-1.30%	0.30%	-0.70%
Bias Result:	PASSED	PASSED	PASSED	PASSED

System Bias Drift Results

Low Drift:	0.00%	-0.10%	0.20%	-0.10%
Mid Drift:	-0.10%	-0.90%	0.30%	-0.70%
Drift Result:	PASSED	PASSED	PASSED	PASSED
Cal Result:	OK	OK	OK	OK

Test Run 1 Bias Correction Calculations:

	O2	CO2	NOx	CO
Low init:	0.006	0.096	0.07	0.054
Low final:	-0.001	0.077	0.117	0.042
Mid Init:	11.03	11.039	8.789	4.701
Mid Final:	11.007	10.843	8.849	4.641
Run Avg:	6.091	9.113	6.822	0.022
Co:	0.002	0.086	0.093	0.048
Cm:	11.019	10.941	8.819	4.671
Coa:	0	0	0	0
Cma:	11.14	11.13	8.92	4.55
Corrected:	6.157	9.256	6.878	-0.026

583056 Kern Energy Test 1 Test Run 2_full

583056 Kern Energy Test 1

Test Run 2

Start: 12/28/2023 12:58:00

End: 12/28/2023 13:28:00

Operator: Jeff Harris

Plant: Panama Lane Facility

Location: Stack Outlet

Source ID: THI Heater

Time	Entry	O2 %	CO2 %	NOx ppm	CO ppm
12:57:18	Sampling Started				
12:58:00	Test Started				
12:59:00	1min avg:	5.873	9.144	6.914	0.005
13:00:00	1min avg:	6.03	9.088	7.01	0.006
13:01:00	1min avg:	6.124	9.034	6.685	0.01
13:02:00	1min avg:	6.283	8.952	6.494	0.006
13:03:00	1min avg:	6.316	8.921	6.237	0.014
13:04:00	1min avg:	6.3	8.937	6.274	0.006
13:05:00	1min avg:	6.355	8.906	6.292	0.009
13:06:00	1min avg:	6.357	8.898	6.204	0.01
13:07:00	1min avg:	6.267	8.943	6.252	0.011
13:08:00	1min avg:	6.122	9.008	6.431	0.006
13:09:00	1min avg:	5.941	9.126	6.84	0.005
13:10:00	1min avg:	5.916	9.157	7.211	0.006
13:11:00	1min avg:	6.033	9.092	7.208	0.004
13:12:00	1min avg:	6.087	9.051	7.047	0.017
13:13:00	1min avg:	6.118	9.018	6.952	0.01
13:14:00	1min avg:	6.217	8.962	6.911	0.015
13:15:00	1min avg:	6.305	8.884	6.675	0.029
13:16:00	1min avg:	6.279	8.882	6.56	0.009
13:17:00	1min avg:	6.213	8.901	6.707	0.003
13:18:00	1min avg:	6.021	9.007	6.896	0.004
13:19:00	1min avg:	6.02	9.014	7.303	0.015
13:20:00	1min avg:	6.117	8.969	7.293	0.006
13:21:00	1min avg:	6.212	8.895	6.992	0.011
13:22:00	1min avg:	6.214	8.878	6.879	0.006
13:23:00	1min avg:	6.228	8.88	6.898	0.007
13:24:00	1min avg:	6.275	8.846	6.849	0.005
13:25:00	1min avg:	6.287	8.82	6.748	0.005
13:26:00	1min avg:	6.2	8.869	6.764	0.002
13:27:00	1min avg:	6.2	8.878	6.897	0.006
13:28:00	1min avg:	6.238	8.864	6.876	0.008
13:28:00	Sampling Finished				
13:28:00	Test Complete				
13:28:00	Test Avgs:	6.172	8.961	6.777	0.009

583056 Kern Energy Test 1 Run 2 Final Bias & Drift Check

583056 Kern Energy Test 1 Run 2

Run 2 Final Bias & Drift Check

Date/Time: 12/28/2023 13:36:56

Result: PASS

Operator: Jeff Harris
 Plant: Panama Lane Facility
 Location: Stack Outlet
 Source ID: THI Heater

Reference Cylinder IDs

	Low ID	Upscale ID	Span ID
O2	CC146489	ALM036586	CC65982
CO2	CC146489	ALM036586	CC65982
NOx	CC146489	DT0022596	EB0061497
CO	ALM036586	DT0045374	DT0022596

System Bias Check Results

Analyte:	O2	CO2	NOx	CO
Units:	%	%	ppm	ppm
Span:	21.54	22.07	21.33	8.57
Range:	25	25	25	10
Method:	EPA 7E	EPA 7E	EPA 7E	EPA 7E

Low Cal:	-0.02	-0.026	0.051	-0.002
Low Sys:	-0.007	0.048	0.074	0.001
Low Bias:	0.10%	0.30%	0.10%	0.00%

Upscale Cal:	11.133	11.13	8.784	4.698
Upscale Sys:	10.998	10.706	8.892	4.568
Upscale Bias	-0.60%	-1.90%	0.50%	-1.50%

Bias Result:	PASSED	PASSED	PASSED	PASSED
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System Bias Drift Results

Low Drift:	0.00%	-0.10%	-0.20%	-0.50%
Mid Drift:	0.00%	-0.60%	0.20%	-0.80%
Drift Result:	PASSED	PASSED	PASSED	PASSED

Cal Result:	OK	OK	OK	OK
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Test Run 2 Bias Correction Calculations:

	O2	CO2	NOx	CO
Low init:	-0.001	0.077	0.117	0.042
Low final:	-0.007	0.048	0.074	0.001
Mid Init:	11.007	10.843	8.849	4.641
Mid Final:	10.998	10.706	8.892	4.568
Run Avg:	6.172	8.961	6.777	0.009
Co:	-0.004	0.063	0.095	0.021
Cm:	11.003	10.775	8.871	4.604
Coa:	0	0	0	0
Cma:	11.14	11.13	8.92	4.55
Corrected:	6.25	9.246	6.791	-0.013

583056 Kern Energy Test 1 Test Run 3_full

583056 Kern Energy Test 1

Test Run 3

Start: 12/28/2023 13:41:00

End: 12/28/2023 14:11:00

Operator: Jeff Harris

Plant: Panama Lane Facility

Location: Stack Outlet

Source ID: THI Heater

Time	Entry	O2 %	CO2 %	NOx ppm	CO ppm
13:40:06	Sampling Started				
13:41:00	Test Started				
13:41:59	1min avg:	6.257	8.825	6.944	0.011
13:42:59	1min avg:	6.347	8.77	6.709	0.016
13:43:59	1min avg:	6.329	8.766	6.536	0.004
13:44:59	1min avg:	6.118	8.87	6.608	0.005
13:45:59	1min avg:	6.067	8.941	7.043	0.004
13:46:59	1min avg:	6.117	8.917	7.093	0.005
13:47:59	1min avg:	6.217	8.856	6.959	0.004
13:48:59	1min avg:	6.221	8.836	6.797	0.008
13:49:59	1min avg:	6.202	8.846	6.799	0.005
13:50:59	1min avg:	6.123	8.895	6.938	0.009
13:51:59	1min avg:	6.127	8.899	7.062	0.008
13:52:59	1min avg:	6.264	8.83	6.988	0.015
13:53:59	1min avg:	6.307	8.779	6.72	0.004
13:54:59	1min avg:	6.133	8.869	6.746	0.005
13:55:59	1min avg:	6.101	8.913	7.119	0.003
13:56:59	1min avg:	6.135	8.884	7.071	0.004
13:57:59	1min avg:	6.213	8.839	6.935	0.004
13:58:59	1min avg:	6.31	8.77	6.734	0.012
13:59:59	1min avg:	6.254	8.799	6.616	0.005
14:00:59	1min avg:	6.214	8.813	6.823	0.006
14:01:59	1min avg:	6.164	8.853	6.911	0.007
14:02:59	1min avg:	6.188	8.841	7.048	0.006
14:03:59	1min avg:	6.134	8.856	7.036	0.015
14:04:59	1min avg:	6.061	8.91	7.227	0.004
14:05:59	1min avg:	6.036	8.921	7.356	0.005
14:06:59	1min avg:	5.959	8.961	7.391	0.004
14:07:59	1min avg:	5.902	9.001	7.678	0.003
14:08:59	1min avg:	5.936	8.993	7.848	0.004
14:09:59	1min avg:	6.126	8.891	7.633	0.005
14:10:59	1min avg:	6.208	8.819	7.219	0.003
14:11:00	Sampling Finished				
14:11:00	Test Complete				
14:11:00	Test Avgs:	6.159	8.865	7.02	0.007

583056 Kern Energy Test 1 Run 3 Final Bias & Drift Check

583056 Kern Energy Test 1 Run 3

Run 3 Final Bias & Drift Check

Date/Time: 12/28/2023 14:19:27

Result: PASS

Operator: Jeff Harris
Plant: Panama Lane Facility
Location: Stack Outlet
Source ID: THI Heater

Reference Cylinder IDs

	Low ID	Upscale ID	Span ID
O2	CC146489	ALM036586	CC65982
CO2	CC146489	ALM036586	CC65982
NOx	CC146489	DT0022596	EB0061497
CO	ALM036586	DT0045374	DT0022596

System Bias Check Results

Analyte:	O2	CO2	NOx	CO
Units:	%	%	ppm	ppm
Span:	21.54	22.07	21.33	8.57
Range:	25	25	25	10
Method:	EPA 7E	EPA 7E	EPA 7E	EPA 7E
Low Cal:	-0.02	-0.026	0.051	-0.002
Low Sys:	0.001	0.107	0.104	0.004
Low Bias:	0.10%	0.60%	0.20%	0.10%
Upscale Cal:	11.133	11.13	8.784	4.698
Upscale Sys:	10.998	10.659	8.856	4.602
Upscale Bias	-0.60%	-2.10%	0.30%	-1.10%
Bias Result:	PASSED	PASSED	PASSED	PASSED

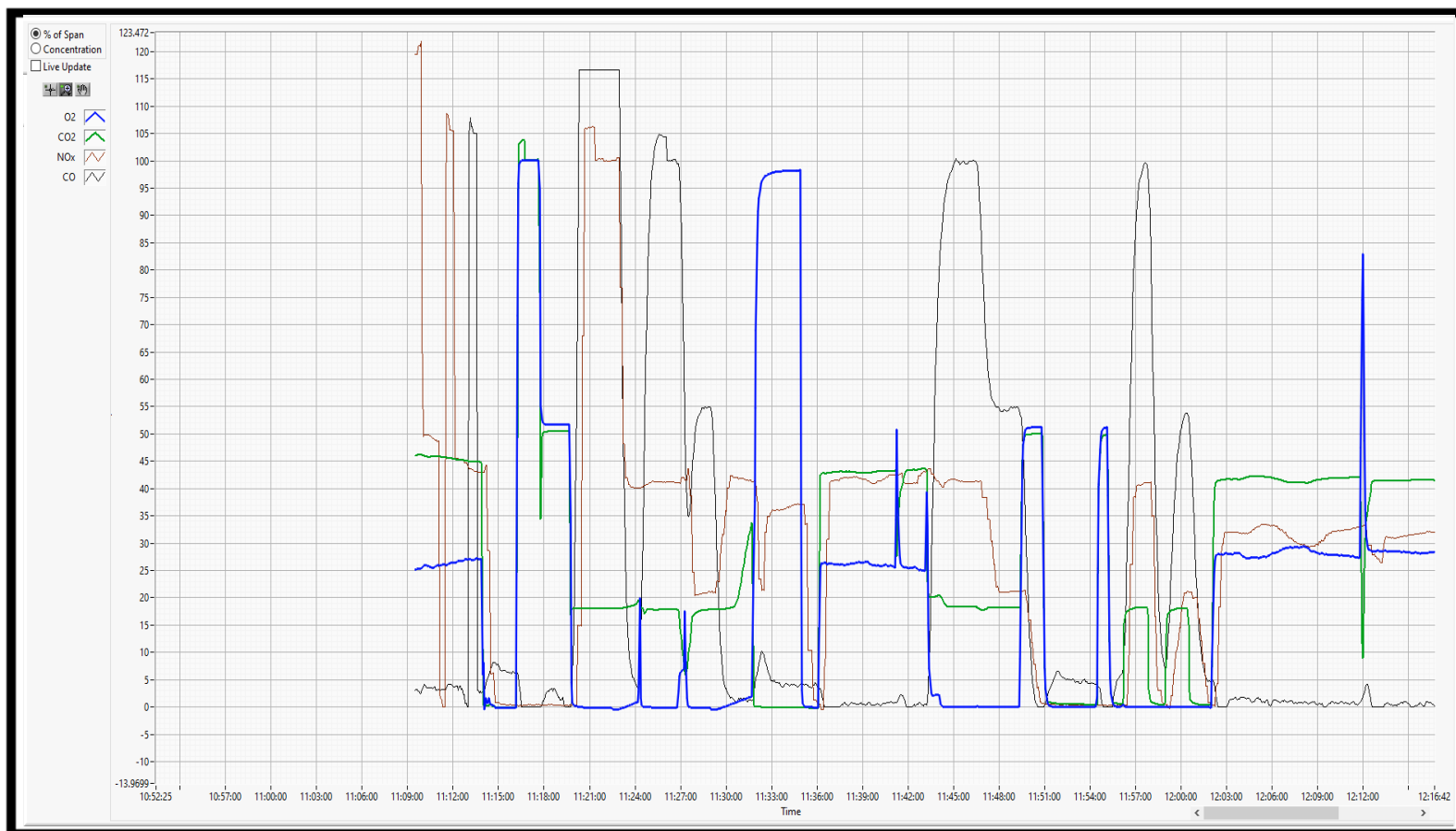
System Bias Drift Results

Low Drift:	0.00%	0.30%	0.10%	0.00%
Mid Drift:	0.00%	-0.20%	-0.20%	0.40%
Drift Result:	PASSED	PASSED	PASSED	PASSED
Cal Result:	OK	OK	OK	OK

Test Run 3 Bias Correction Calculations:

	O2	CO2	NOx	CO
Low init:	-0.007	0.048	0.074	0.001
Low final:	0.001	0.107	0.104	0.004
Mid Init:	10.998	10.706	8.892	4.568
Mid Final:	10.998	10.659	8.856	4.602
Run Avg:	6.159	8.865	7.02	0.007
Co:	-0.003	0.078	0.089	0.003
Cm:	10.998	10.682	8.874	4.585
Coa:	0	0	0	0
Cma:	11.14	11.13	8.92	4.55
Corrected:	6.24	9.223	7.037	0.004

Kern Energy-Panama Lane Facility THI Heater
Initial Calibrations 12/28/2023 11:28:44



Initial Calibration Error Response

	Zero	Mid	High
O2	-0.02	11.133	21.571
CO2	-0.026	11.13	22.107
NOx	0.051	8.784	21.309
CO	-0.002	4.698	8.598

NO2 Converter Efficiency

Response= 7.915

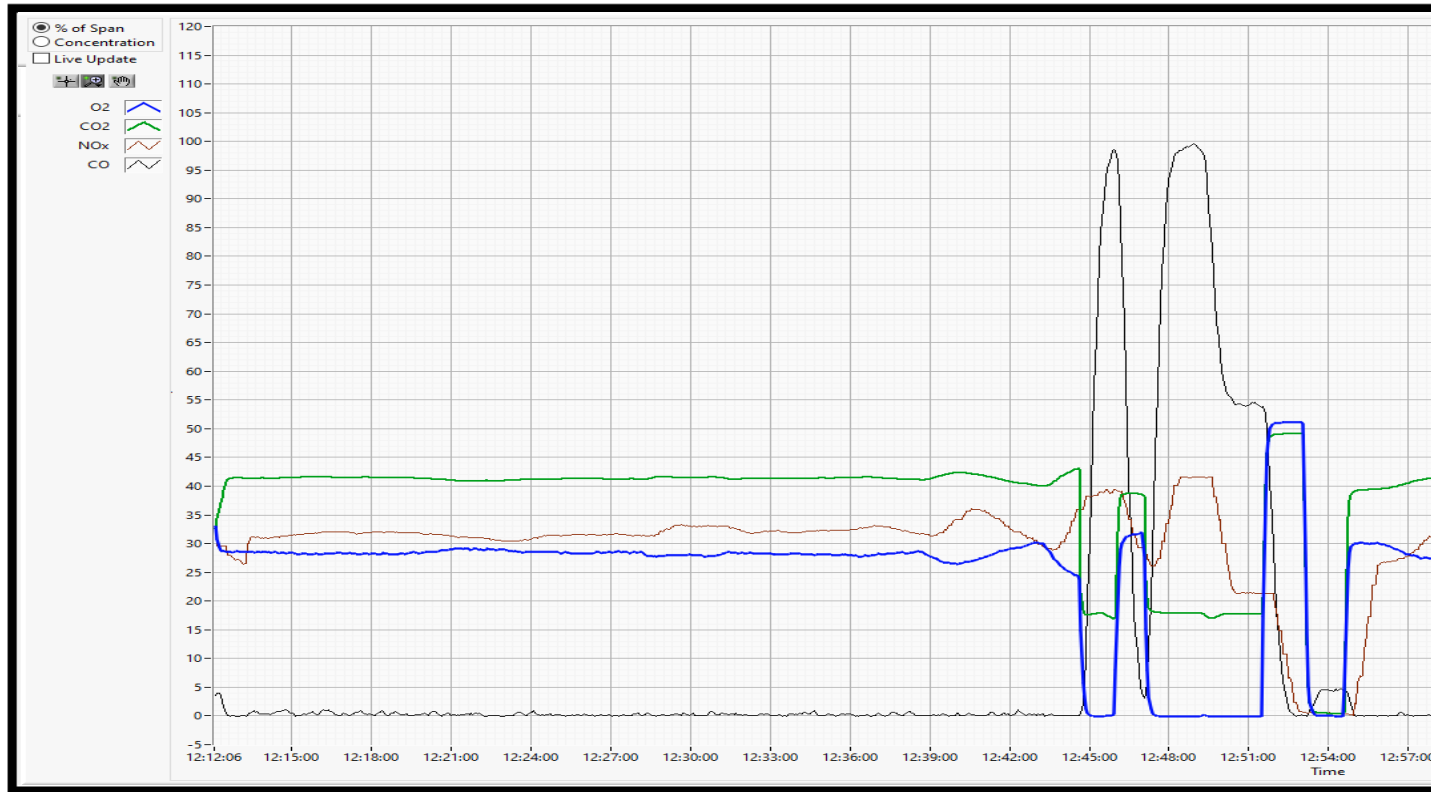
System Response Times

	Dnscale (S)	Upscale (S)
O2	35	37
CO2	35	36
NOx	66	75
CO	95	82

Initial System Bias Response

	Zero	Span
O2	0.006	11.03
CO2	0.096	11.039
NOx	0.07	8.789
CO	0.054	4.701

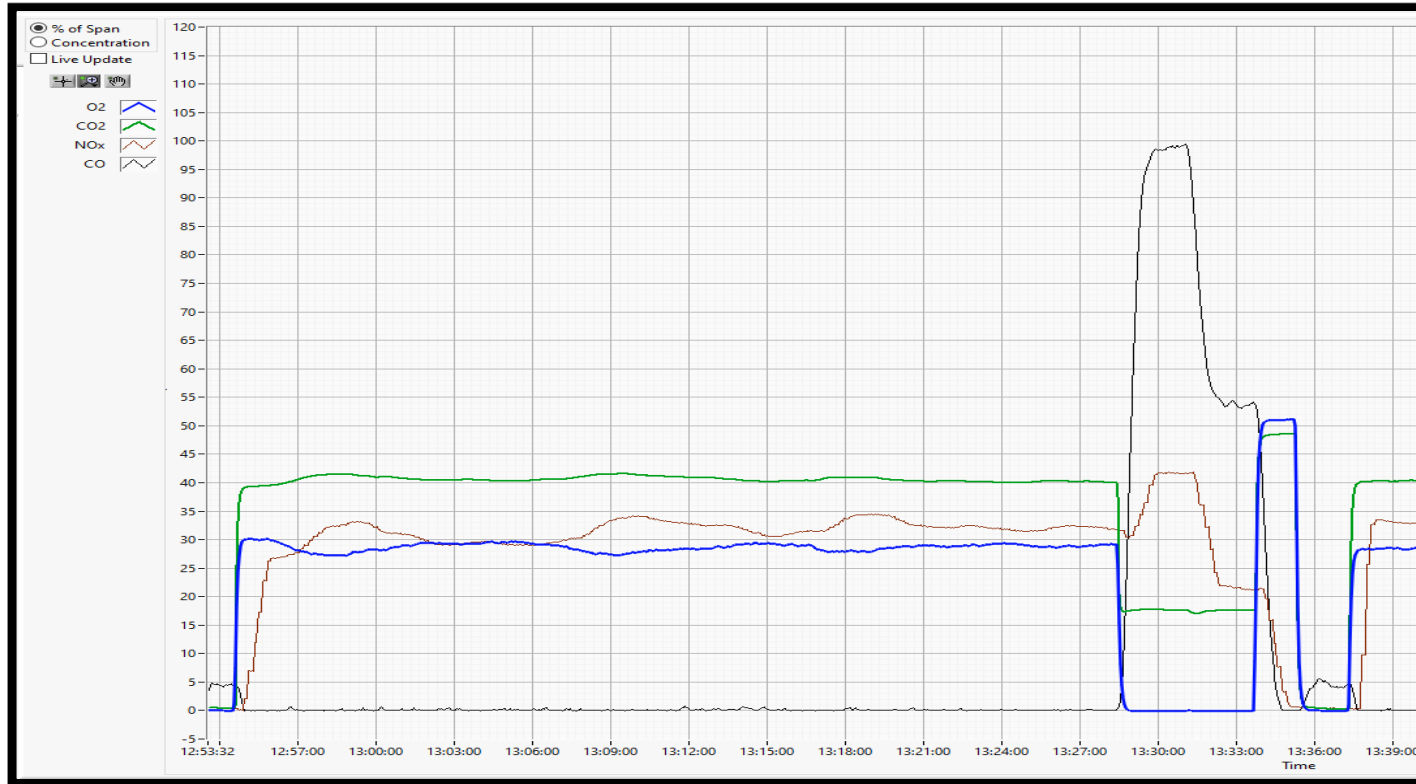
Kern Energy-Panama Lane Facility THI Heater
Test Run 1 12/28/2023 12:14:00-12:44:00



Final System Bias Check Run 1

	Zero	Span
O2	-0.001	11.007
CO2	0.077	10.843
NOx	0.117	8.849
CO	0.042	4.641

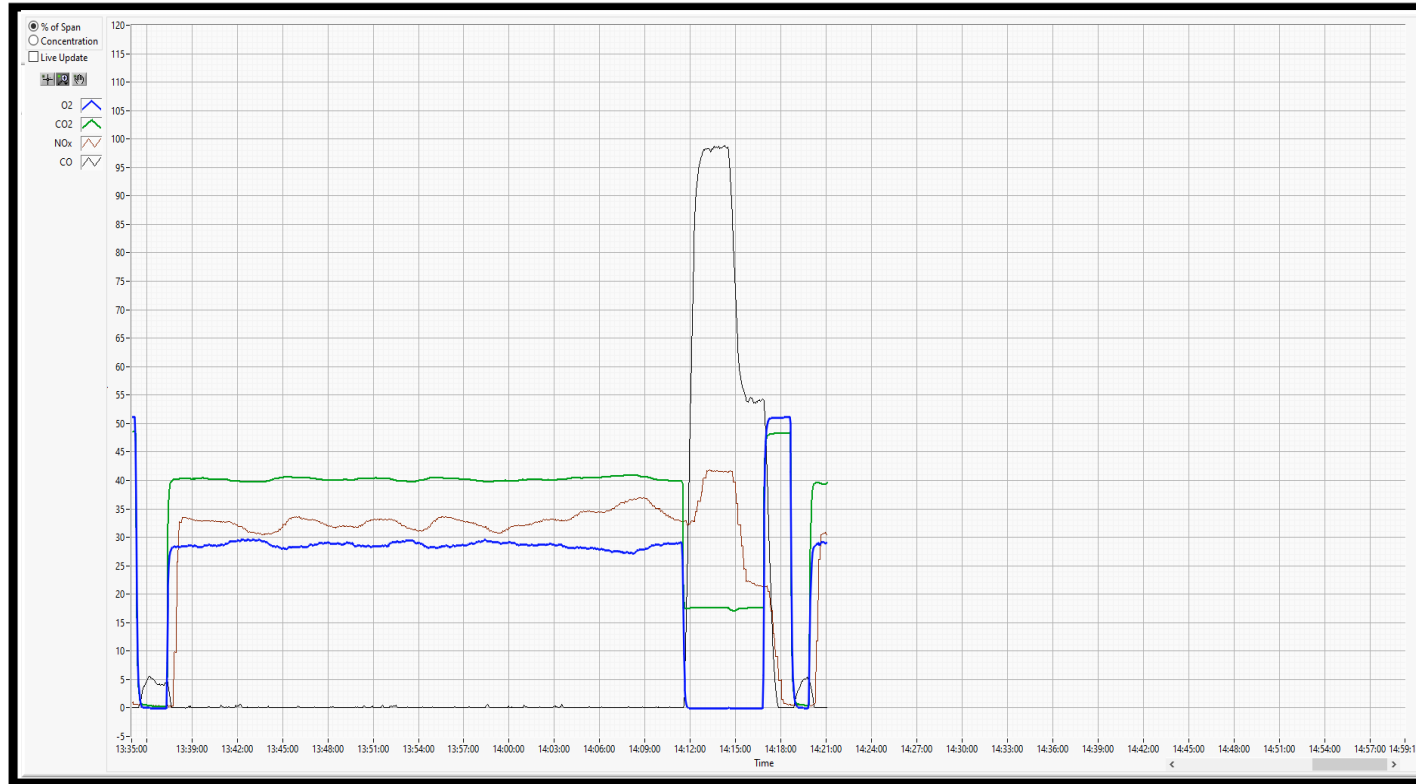
Kern Energy-Panama Lane Facility THI Heater
Test Run 2 12/28/2023 12:58:00-13:28:00



Final System Bias Check Run 2

	Zero	Span
O2	-0.007	10.998
CO2	0.048	10.706
NOx	0.074	8.892
CO	0.001	4.568

Kern Energy-Panama Lane Facility THI Heater
Test Run 3 12/28/2023 13:41:00-14:11:00



Final System Bias Check Run 3

	Zero	Span
O2	0.001	10.998
CO2	0.107	10.659
NOx	0.104	8.856
CO	0.004	4.602

CERTIFICATE OF BATCH ANALYSIS

Grade of Product: CEM-CAL ZERO

Part Number:	NI CZ15A	Reference Number:	48-402844636-1
Cylinder Analyzed:	ALM-038895	Cylinder Volume:	142.0 CF
Laboratory:	124 - Los Angeles (SAP) - CA	Cylinder Pressure:	2000 PSIG
Analysis Date:	Sep 13, 2023	Valve Outlet:	580
Lot Number:	48-402844636-1		

Expiration Date: Sep 13, 2031

ANALYTICAL RESULTS

Component	Requested Purity	Certified Concentration
NITROGEN	99.9995 %	99.9995 %
NOx	0.1 PPM	<LDL 0.018 PPM
SO2	0.1 PPM	<LDL 0.095 PPM
THC	0.1 PPM	<LDL 0.006 PPM
CARBON MONOXIDE	0.5 PPM	<LDL 0.012 PPM
CARBON DIOXIDE	1.0 PPM	0.100 PPM

Permanent Notes: Airgas certifies that the contents of this cylinder meet the requirements of 40 CFR 72.2

Cylinders in Batch:

ALM-038895, B0097322, C C 146752, C C 712555, CC123610, CC141722, **CC146489**, CC152345, CC194476, CC27887, CC512588, CC712565, XC021278B, XC026157B

Impurities verified against analytical standards traceable to NIST by weight and/or analysis.



CERTIFICATE OF ANALYSIS

Grade of Product: EPA PROTOCOL STANDARD

Part Number:	E03NI78E15A0225	Reference Number:	48-402799332-1
Cylinder Number:	ALM036586	Cylinder Volume:	152.0 CF
Laboratory:	124 - Los Angeles (SAP) - CA	Cylinder Pressure:	2015 PSIG
PGVP Number:	B32023	Valve Outlet:	590
Gas Code:	CO2,O2,BALN	Certification Date:	Jul 27, 2023

Expiration Date: Jul 27, 2031

Certification performed in accordance with "EPA Traceability Protocol for Assay and Certification of Gaseous Calibration Standards (May 2012)" document EPA 600/R-12/531, using the assay procedures listed. Analytical Methodology does not require correction for analytical interference. This cylinder has a total analytical uncertainty as stated below with a confidence level of 95%. There are no significant impurities which affect the use of this calibration mixture. All concentrations are on a mole/mole basis unless otherwise noted. The results relate only to the items tested. The report shall not be reproduced except in full without approval of the laboratory. Do Not Use This Cylinder below 100 psig, i.e. 0.7 megapascals.

ANALYTICAL RESULTS

Component	Requested Concentration	Actual Concentration	Protocol Method	Total Relative Uncertainty	Assay Dates
CARBON DIOXIDE	11.00 %	11.13 %	G1	+/- 0.6% NIST Traceable	07/27/2023
OXYGEN	11.00 %	11.14 %	G1	+/- 0.9% NIST Traceable	07/27/2023
NITROGEN	Balance				

CALIBRATION STANDARDS

Type	Lot ID	Cylinder No	Concentration	Uncertainty	Expiration Date
NTRM	13060402	CC411643	7.489 % CARBON DIOXIDE/NITROGEN	+/- 0.6%	May 14, 2025
NTRM	98051002	SG9150866BAL	12.05 % OXYGEN/NITROGEN	+/- 0.7%	Dec 14, 2023

ANALYTICAL EQUIPMENT

Instrument/Make/Model	Analytical Principle	Last Multipoint Calibration
SIEMENS 6E CO2	NDIR	Jun 30, 2023
SIEMENS OXYMAT 6	PARAMAGNETIC	Jul 24, 2023

Triad Data Available Upon Request



CERTIFICATE OF ANALYSIS

Grade of Product: EPA PROTOCOL STANDARD

Part Number:	E03NI57E15A3973	Reference Number:	48-402783836-1
Cylinder Number:	CC65982	Cylinder Volume:	161.0 CF
Laboratory:	124 - Los Angeles (SAP) - CA	Cylinder Pressure:	2015 PSIG
PGVP Number:	B32023	Valve Outlet:	590
Gas Code:	CO2,O2,BALN	Certification Date:	Jun 30, 2023

Expiration Date: Jun 30, 2031

Certification performed in accordance with "EPA Traceability Protocol for Assay and Certification of Gaseous Calibration Standards (May 2012)" document EPA 600/R-12/531, using the assay procedures listed. Analytical Methodology does not require correction for analytical interference. This cylinder has a total analytical uncertainty as stated below with a confidence level of 95%. There are no significant impurities which affect the use of this calibration mixture. All concentrations are on a mole/mole basis unless otherwise noted. The results relate only to the items tested. The report shall not be reproduced except in full without approval of the laboratory. Do Not Use This Cylinder below 100 psig, i.e. 0.7 megapascals.

ANALYTICAL RESULTS

Component	Requested Concentration	Actual Concentration	Protocol Method	Total Relative Uncertainty	Assay Dates
CARBON DIOXIDE	21.50 %	22.07 %	G1	+/- 0.6% NIST Traceable	06/30/2023
OXYGEN	21.50 %	21.54 %	G1	+/- 0.6% NIST Traceable	06/30/2023
NITROGEN	Balance				

CALIBRATION STANDARDS

Type	Lot ID	Cylinder No	Concentration	Uncertainty	Expiration Date
NTRM	12061520	CC354777	19.87 % CARBON DIOXIDE/NITROGEN	+/- 0.6%	Jan 11, 2024
NTRM	08010228	K016648	23.20 % OXYGEN/NITROGEN	+/- 0.2%	Jun 01, 2024

ANALYTICAL EQUIPMENT

Instrument/Make/Model	Analytical Principle	Last Multipoint Calibration
SIEMENS 6E CO2	NDIR	Jun 30, 2023
SIEMENS OXYMAT 6	PARAMAGNETIC	Jun 22, 2023

Triad Data Available Upon Request





CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

Customer & Order Information

LGEPKG BAKERSFIELD CA HPS
3505 BUCK OWENS BLVD
BAKERSFIELD CA 93308-4919

Certificate Issuance Date: 12/02/2021

Linde Order Number: 71858027

Part Number: NI CD4CN14E-AS

Customer PO Number: 79858076

Fill Date: 11/15/2021

Lot Number: 70086131908

Cylinder Style & Outlet: AS

CGA 660

Cylinder Pressure and Volume: 2000 psig 140 ft3

Certified Concentration

Expiration Date:	12/02/2024	NIST Traceable
Cylinder Number:	DT0022596	Expanded Uncertainty
4.00 %	Carbon dioxide	± 0.02 %
8.57 ppm	Carbon monoxide	± 0.07 ppm
8.88 ppm	Nitric oxide	± 0.05 ppm
Balance	Nitrogen	

ProSpec EZ Cert



For Reference Only:

NOx 8.92 ppm

Certification Information:

Certification Date: 12/02/2021

Term: 36 Months

Expiration Date: 12/02/2024

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Uncertainty above is expressed as absolute expanded uncertainty at a level of confidence of approximately 95% with a coverage factor k = 2. Do Not Use this Standard if Pressure is less than 100 PSIG.

CO responses have been corrected for CO2 interference. NO responses have been corrected for CO2 quenching.

Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

1. Component:

Carbon dioxide

Requested Concentration: 4 %

Certified Concentration: 4.00 %

Instrument Used: Horiba VIA-510 S/N 20C194WK

Analytical Method: NDIR

Last Multipoint Calibration: 10/21/2021

Reference Standard:

Type / Cylinder #: GMIS / CC86370

Concentration / Uncertainty: 5.03 % ±0.02 %

Expiration Date: 04/17/2022

Traceable to: SRM # / Sample # / Cylinder #: SRM 1674b / 7-H-07 / FF10631

SRM Concentration / Uncertainty: 6.944 % / ±0.013 %

SRM Expiration Date: 06/17/2019

First Analysis Data:				Date
				11/19/2021
Z: 0	R: 5.03	C: 4	Conc: 4	
R: 5.03	Z: 0	C: 4.01	Conc: 4.01	
Z: 0	C: 4	R: 5.03	Conc: 4	
UOM: %		Mean Test Assay: 4		%

Second Analysis Data:				Date
Z: 0	R: 0	C: 0	Conc: 0	
R: 0	Z: 0	C: 0	Conc: 0	
Z: 0	C: 0	R: 0	Conc: 0	
UOM: %		Mean Test Assay:		%

2. Component:

Carbon monoxide

Requested Concentration: 8.5 ppm

Certified Concentration: 8.57 ppm

Instrument Used: Horiba VIA-510 S/N 43627990042

Analytical Method: NDIR

Last Multipoint Calibration: 10/28/2021

Reference Standard:

Type / Cylinder #: GMIS / CC707397

Concentration / Uncertainty: 9.897 ppm ±0.048 ppm

Expiration Date: 09/05/2026

Traceable to: SRM # / Sample # / Cylinder #: SRM 1677c / 5-J-42 / CAL015337

SRM Concentration / Uncertainty: 9.825 PPM / ±0.047 PPM

SRM Expiration Date: 06/24/2024

First Analysis Data:				Date
				11/19/2021
Z: 0	R: 96.7	C: 84.5	Conc: 8.57	
R: 98.6	Z: 0	C: 85.4	Conc: 8.66	
Z: 0	C: 83.6	R: 97.5	Conc: 8.48	
UOM: mV		Mean Test Assay: 8.57		ppm

Second Analysis Data:				Date
Z: 0	R: 0	C: 0	Conc: 0	
R: 0	Z: 0	C: 0	Conc: 0	
Z: 0	C: 0	R: 0	Conc: 0	
UOM: mV		Mean Test Assay:		ppm

3. Component:

Nitric oxide

Requested Concentration: 8.5 ppm

Certified Concentration: 8.88 ppm

Instrument Used: Thermo Electron 42i-LS S/N 1030645077

Analytical Method: Chemiluminescence

Last Multipoint Calibration: 11/29/2021

Reference Standard:

Type / Cylinder #: GMIS / DT0035998

Concentration / Uncertainty: 10.30 ppm ±0.05 ppm

Expiration Date: 11/11/2024

Traceable to: SRM # / Sample # / Cylinder #: PRM / C1837210.02 / APEX1324301

SRM Concentration / Uncertainty: 10.00 ppm / ±0.05 ppm

SRM Expiration Date: 04/17/2022

First Analysis Data:				Date
				11/19/2021
Z: 0	R: 10.3	C: 8.88	Conc: 8.88	
R: 10.29	Z: 0	C: 8.91	Conc: 8.91	
Z: 0	C: 8.89	R: 10.31	Conc: 8.89	
UOM: ppm		Mean Test Assay: 8.89		ppm

Second Analysis Data:				Date
				12/02/2021
Z: 0	R: 10.3	C: 8.87	Conc: 8.87	
R: 10.3	Z: 0	C: 8.86	Conc: 8.86	
Z: 0	C: 8.85	R: 10.29	Conc: 8.85	
UOM: ppm		Mean Test Assay: 8.86		ppm

Analyzed By

Henry Koung

Certified By

Lisette Morales



CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

Customer & Order Information

LGEPKG BAKERSFIELD CA HPS
3505 BUCK OWENS BLVD
BAKERSFIELD CA 93308-4919

Certificate Issuance Date: 11/17/2023

Linde Order Number: 72565302

Part Number: NI CD4CN13E-AS

Customer PO Number: 80575497

Fill Date: 11/03/2023

Lot Number: 70086330705

Cylinder Style & Outlet: AS

Cylinder Pressure and Volume: 2000 psig

CGA 660

140 ft3

Certified Concentration

Expiration Date:	11/17/2026	NIST Traceable
Cylinder Number:	DT0045374	Expanded Uncertainty
4.00 %	Carbon dioxide	± 0.04 %
4.55 ppm	Carbon monoxide	± 0.03 ppm
4.39 ppm	Nitric oxide	± 0.02 ppm
Balance	Nitrogen	

ProSpec EZ Cert



For Reference Only:

NOx 4.42 ppm

Certification Information:

Certification Date: 11/17/2023

Term: 36 Months

Expiration Date: 11/17/2026

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Uncertainty above is expressed as absolute expanded uncertainty at a level of confidence of approximately 95% with a coverage factor k = 2. Do Not Use this Standard if Pressure is less than 100 PSIG.

CO responses have been corrected for CO2 interference. NO responses have been corrected for CO2 quenching.

Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

1. Component:

Carbon dioxide

Requested Concentration: 4 %
Certified Concentration: 4.00 %
Instrument Used: Horiba VIA-510 S/N 20C194WK
Analytical Method: NDIR
Last Multipoint Calibration: 10/31/2023

Reference Standard:

Type / Cylinder #: NTRM / DT0030197

Concentration / Uncertainty: 7.011 % ±0.058 %

Expiration Date: 01/27/2027

Traceable to: SRM # / Sample # / Cylinder #: NTRM#DT0030296 / 190702 / DT0030296

SRM Concentration / Uncertainty: 7.011 % ±0.058

SRM Expiration Date: 01/27/2027

First Analysis Data:				Date	11/10/2023
Z:	0	R:	7.01	C:	4
R:	7.01	Z:	0	C:	4.01
Z:	0	C:	4	R:	7.02
C:	4			Conc:	4
UOM:	%	Mean Test Assay:	4		%

Second Analysis Data:				Date	
Z:	0	R:	0	C:	0
R:	0	Z:	0	C:	0
Z:	0	C:	0	R:	0
C:	0			Conc:	0
UOM:	%	Mean Test Assay:			%

2. Component:

Carbon monoxide

Requested Concentration: 4.5 ppm
Certified Concentration: 4.55 ppm
Instrument Used: Horiba VIA-510 S/N 43627990042
Analytical Method: NDIR
Last Multipoint Calibration: 10/25/2023

Reference Standard:

Type / Cylinder #: GMIS / CC87399

Concentration / Uncertainty: 4.993 ppm ±0.024 ppm

Expiration Date: 08/16/2030

Traceable to: SRM # / Sample # / Cylinder #: 1677C / 5-J-42 / CAL015337

SRM Concentration / Uncertainty: 9.825 % ±0.047

SRM Expiration Date: 06/24/2024

First Analysis Data:				Date	11/10/2023
Z:	0	R:	49.2	C:	44.8
R:	49.6	Z:	0	C:	45.2
Z:	0	C:	45.1	R:	49.4
C:	45.1			Conc:	4.56
UOM:	mV	Mean Test Assay:	4.55		ppm

Second Analysis Data:				Date	
Z:	0	R:	0	C:	0
R:	0	Z:	0	C:	0
Z:	0	C:	0	R:	0
C:	0			Conc:	0
UOM:	mV	Mean Test Assay:			ppm

3. Component:

Nitric oxide

Requested Concentration: 4.5 ppm
Certified Concentration: 4.39 ppm
Instrument Used: Thermo Electron 42i-LS S/N 1030645077
Analytical Method: Chemiluminescence
Last Multipoint Calibration: 10/18/2023

Reference Standard:

Type / Cylinder #: GMIS / DT0037199

Concentration / Uncertainty: 5.43 ppm ±0.03 ppm

Expiration Date: 12/15/2024

Traceable to: SRM # / Sample # / Cylinder #: PRM / C2268801 / APEX1429266

SRM Concentration / Uncertainty: 10.01 ppm / ±0.05 ppm

SRM Expiration Date: 09/30/2024

First Analysis Data:				Date	11/10/2023
Z:	0	R:	5.43	C:	4.38
R:	5.44	Z:	0	C:	4.4
Z:	0	C:	4.39	R:	5.42
C:	4.39			Conc:	4.39
UOM:	ppm	Mean Test Assay:	4.39		ppm

Second Analysis Data:				Date	11/17/2023
Z:	0	R:	5.43	C:	4.39
R:	5.43	Z:	0	C:	4.39
Z:	0	C:	4.4	R:	5.44
C:	4.4			Conc:	4.4
UOM:	ppm	Mean Test Assay:	4.39		ppm

Analyzed By

Henry Koung

Certified By

Lisette Morales

CERTIFICATE OF ANALYSIS

Grade of Product: EPA PROTOCOL STANDARD

Part Number:	E04NI95E15A0045	Reference Number:	48-402596463-1
Cylinder Number:	EB0061497	Cylinder Volume:	146.0 CF
Laboratory:	124 - Los Angeles (SAP) - CA	Cylinder Pressure:	2015 PSIG
PGVP Number:	B32022	Valve Outlet:	660
Gas Code:	CO2,CO,NO,NOX,BALN	Certification Date:	Nov 30, 2022

Expiration Date: Nov 30, 2025

Certification performed in accordance with "EPA Traceability Protocol for Assay and Certification of Gaseous Calibration Standards (May 2012)" document EPA 600/R-12/531, using the assay procedures listed. Analytical Methodology does not require correction for analytical interference. This cylinder has a total analytical uncertainty as stated below with a confidence level of 95%. There are no significant impurities which affect the use of this calibration mixture. All concentrations are on a mole/mole basis unless otherwise noted. The results relate only to the items tested. The report shall not be reproduced except in full without approval of the laboratory. Do Not Use This Cylinder below 100 psig, i.e. 0.7 megapascals.

ANALYTICAL RESULTS

Component	Requested Concentration	Actual Concentration	Protocol Method	Total Relative Uncertainty	Assay Dates
NOX	21.00 PPM	21.33 PPM	G1	+/- 1.4% NIST Traceable	11/17/2022, 11/30/2022
CARBON MONOXIDE	21.00 PPM	20.89 PPM	G1	+/- 0.9% NIST Traceable	11/17/2022
NITRIC OXIDE	21.00 PPM	21.14 PPM	G1	+/- 1.4% NIST Traceable	11/17/2022, 11/30/2022
CARBON DIOXIDE	4.000 %	3.959 %	G1	+/- 0.7% NIST Traceable	11/17/2022
NITROGEN	Balance				

CALIBRATION STANDARDS

Type	Lot ID	Cylinder No	Concentration	Uncertainty	Expiration Date
NTRM	14060711	CC432223	49.88 PPM CARBON MONOXIDE/NITROGEN	+/- 0.6%	Feb 13, 2026
PRM	12409	D913660	15.01 PPM NITROGEN DIOXIDE/AIR	+/- 1.5%	Feb 17, 2023
NTRM	20060403	ND46720	20.72 PPM NITRIC OXIDE/NITROGEN	+/- 1.0%	Apr 27, 2023
GMIS	1534012021101	ND73001	4.947 PPM NITROGEN DIOXIDE/NITROGEN	+/- 1.6%	Jun 15, 2025
NTRM	13060432	CC413737	7.489 % CARBON DIOXIDE/NITROGEN	+/- 0.6%	May 14, 2025

The SRM, NTRM, PRM, or RGM noted above is only in reference to the GMIS used in the assay and not part of the analysis.

ANALYTICAL EQUIPMENT

Instrument/Make/Model	Analytical Principle	Last Multipoint Calibration
Nicolet iS50 AUP2010243 CO2 HIGH	FTIR	Nov 03, 2022
Nicolet iS50 AUP2010243 CO	FTIR	Oct 23, 2022
Nicolet iS50 AUP2010243 NO	FTIR	Oct 31, 2022
Nicolet iS50 AUP2010243 NO2	FTIR	Nov 07, 2022

Triad Data Available Upon Request



CERTIFICATE OF ANALYSIS

Grade of Product: EPA PROTOCOL STANDARD

Part Number:	E02AI99E15W0038	Reference Number:	48-402012663-1
Cylinder Number:	CC503450	Cylinder Volume:	146.2 CF
Laboratory:	124 - Los Angeles (SAP) - CA	Cylinder Pressure:	2015 PSIG
PGVP Number:	B32021	Valve Outlet:	660
Gas Code:	NO2,BALN	Certification Date:	Feb 22, 2021

Expiration Date: Feb 22, 2024

Certification performed in accordance with "EPA Traceability Protocol for Assay and Certification of Gaseous Calibration Standards (May 2012)" document EPA 600/R-12/531, using the assay procedures listed. Analytical Methodology does not require correction for analytical interference. This cylinder has a total analytical uncertainty as stated below with a confidence level of 95%. There are no significant impurities which affect the use of this calibration mixture. All concentrations are on a mole/mole basis unless otherwise noted. The results relate only to the items tested. The report shall not be reproduced except in full without approval of the laboratory. Do Not Use This Cylinder below 100 psig, i.e. 0.7 megapascals.

ANALYTICAL RESULTS

Component	Requested Concentration	Actual Concentration	Protocol Method	Total Relative Uncertainty	Assay Dates
NITROGEN DIOXIDE AIR	8.500 PPM Balance	8.300 PPM	G1	+/- 2.1% NIST Traceable	02/15/2021, 02/22/2021

CALIBRATION STANDARDS

Type	Lot ID	Cylinder No	Concentration	Uncertainty	Expiration Date
GMIS	4014238391058	CC508987	9.023 PPM NITROGEN DIOXIDE/NITROGEN	+/- 2.1%	Feb 10, 2023
PRM	12386	D685025	9.91 PPM NITROGEN DIOXIDE/AIR	+/- 2.0%	Feb 20, 2020

The SRM, NTRM, PRM, or RGM noted above is only in reference to the GMIS used in the assay and not part of the analysis.

ANALYTICAL EQUIPMENT

Instrument/Make/Model	Analytical Principle	Last Multipoint Calibration
MKS FTIR NO2 018335821	FTIR	Feb 13, 2021

Triad Data Available Upon Request





NO₂ Converter Efficiency Verification

Project Number:	583056	Stack Test Date:	12/28/2023
Customer:	Kern Energy	Facility:	Panama Lane
Unit Identification:	THI Heater	Recorded By:	Jeff Harris
Sample Location:	Stack Outlet	CE Test Date:	12/28/2023
NOx Analyzer Model #:	T200H	Converter Temp:	315
NOx Analyzer Serial #:	822		

Option I: Cylinder gas verification

NO ₂ Gas Certified Concentration:	8.300
NO ₂ Gas Cylinder ID:	CC503450
NO ₂ Gas Expiration Date:	02/22/24

Analyzer Response to NO ₂ Gas:	7.9
Converter Efficiency:	95.4
Converter Status:	Pass



Response Time Verification

Project Number: 583056
Customer: Kern Energy
Unit Identification: THI Heater
Sample Location: Stack Outlet

Test Date: 12/28/23
Facility: Panama Lane
Recorded By: Jeff Harris

Upscale Response Check							
Pollutant	Cal Gas Level	Cal Gas Conc.	Start Time	Stable Response	Upscale Target Response	Time at Target	Response Time
NO _x	Mid	8.92	0:00:00	8.29	7.87	1:15	1:15
CO	Mid	4.55	0:00:00	4.20	3.99	1:22	1:22
CO ₂	Mid	11.13	0:00:00	10.49	9.96	0:36	0:36
O ₂	Mid	11.14	0:00:00	10.48	9.96	0:37	0:37

Target Response is 95% of the Pre 1 System Response from the Upscale Bias Test

Start time is the time at which gas is introduced upstream of the probe.

Time at target is the time at which the required target response is achieved.

Response time is the difference between the two.

Downscale Response Check						
Pollutant	Cal Gas Level	Cal Gas Conc.	Start Time	Downscale Target Response	Time at Target	Response Time
NO _x	Mid	8.9	0:00:00	0.45	1:06	1:06
CO	Mid	4.6	0:00:00	0.23	1:35	1:35
CO ₂	Mid	11.1	0:00:00	0.56	0:35	0:35
O ₂	Mid	11.1	0:00:00	0.56	0:35	0:35

Target Response is 0.5 ppm or 5.0 percent of the upscale gas concentration (whichever is less restrictive)

System Response Times	
Pollutant	Response Time
NO _x	1:15:00
CO	1:35:00
CO ₂	0:36:00
O ₂	0:37:00

System response is the longer of the responses to zero and upscale gas.

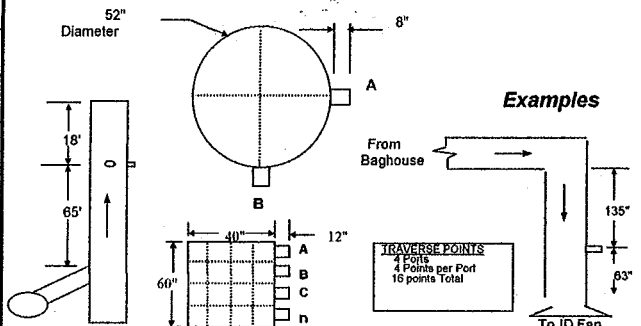
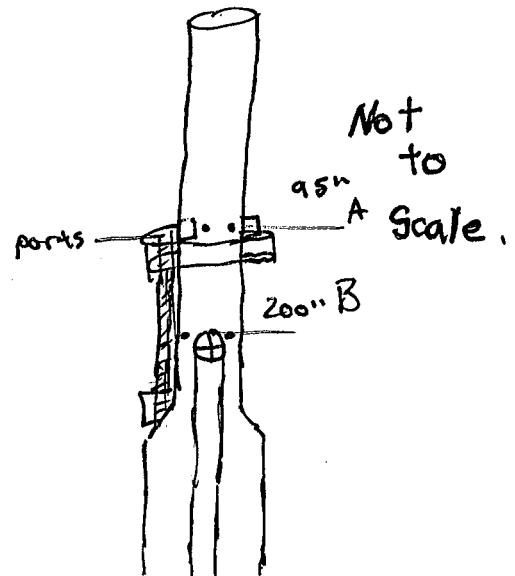
40 CFR 60 Method 1 -- TRAVERSE POINT LOCATIONS

Project No. 583056P		Date 12/28/23
Client Kern Oil		Operator BBH
Facility Kern Refinery	Source THI	

Dimensions Circular <input checked="" type="checkbox"/> Rectangular <input type="checkbox"/> Far Wall to Outside of Port (in.) 90.25 Stack Width (in.) Port Length (in.) 8.00" Depth (in.) Stack Diameter or Depth (in.) 82.25 Equiv. Stack Diameter (in.)						Stack / Ports Stack Type: <input checked="" type="checkbox"/> Circular <input type="checkbox"/> Rectangular Number and Type of Ports Available Two Flange Port Inside Diameter (in.) 3" Distance to Flow Disturb. Reference: ___ Disturbance ___ Port			
Point No.	A	B	(A x B)	C	(A x B) + C	Upstream (U)		Distance (ft)	Diameters
	Internal Dimension (in.)	Percentage of Internal Dimension (%)	Distance from Inside Wall (in.)	Port Length (in.)	Point Location (in.)	Downstream (D)			
						Number of Traverse Points	CEM	Particulates	Velocity
						Minimum Required	6		
						Number of Ports Used	2		
						Points per Port	6		

Test Location Schematic(s)

1. Include distances to disturbances and note what they are.
2. Show and label all ports. Note which was used for each test type.
3. Indicate the air flow direction.



Comments:



40 CFR 60 Method 18 -- TEDLAR BAG SAMPLING

Project No. 583056	Bag Size 5 Liter	Date 12/28/2023
Client Kern Energy	Pump ID N T-2	Operator/Analyst JH/JM
Facility Panama Road Facility	Calibrator ID --	Source Temperature (°F) --
Source/Process IDTH1 Heater	Pipe Diameter (in) 82.25	Source Pressure (in Hg) --
Analytes C ¹ - C ³		Source Moisture (%) --

Sampling Rotameter Calibration

	Initial	Final	Average
Ball Setting:	--	--	--
Flow (L/min)	--	--	--

Sampling Location Schematic

--

Test 1 Sampling Data

Sample ID: 217257																		
Start Time: 1214																		
Stop Time: 1244																		
P _{bar} (in Hg): 29.75																		
T _{ambient} (°F):																		
<table border="1"><thead><tr><th>Elapsed Time</th><th>Ball Setting</th></tr></thead><tbody><tr><td>0</td><td>0.2 CC</td></tr><tr><td>5</td><td>0.2</td></tr><tr><td>10</td><td>0.2</td></tr><tr><td>15</td><td>0.2</td></tr><tr><td>20</td><td>0.2</td></tr><tr><td>25</td><td>0.2</td></tr><tr><td>30</td><td>0.2</td></tr><tr><td>35</td><td>--</td></tr></tbody></table>	Elapsed Time	Ball Setting	0	0.2 CC	5	0.2	10	0.2	15	0.2	20	0.2	25	0.2	30	0.2	35	--
Elapsed Time	Ball Setting																	
0	0.2 CC																	
5	0.2																	
10	0.2																	
15	0.2																	
20	0.2																	
25	0.2																	
30	0.2																	
35	--																	
Sample Volume (L)	--																	
Dilution Gas (L)	--																	
Total Volume (L)	--																	

Test 2 Sampling Data

Sample ID: 217258																		
Start Time: 1258																		
Stop Time: 1328																		
P _{bar} (in Hg): 29.75																		
T _{ambient} (°F):																		
<table border="1"><thead><tr><th>Elapsed Time</th><th>Ball Setting</th></tr></thead><tbody><tr><td>0</td><td>0.2 CC</td></tr><tr><td>5</td><td>0.2</td></tr><tr><td>10</td><td>0.15</td></tr><tr><td>15</td><td>0.15</td></tr><tr><td>20</td><td>0.15</td></tr><tr><td>25</td><td>0.15</td></tr><tr><td>30</td><td>0.15</td></tr><tr><td>35</td><td>--</td></tr></tbody></table>	Elapsed Time	Ball Setting	0	0.2 CC	5	0.2	10	0.15	15	0.15	20	0.15	25	0.15	30	0.15	35	--
Elapsed Time	Ball Setting																	
0	0.2 CC																	
5	0.2																	
10	0.15																	
15	0.15																	
20	0.15																	
25	0.15																	
30	0.15																	
35	--																	
Sample Volume (L)	--																	
Dilution Gas (L)	--																	
Total Volume (L)	--																	

Test 3 Sampling Data

Sample ID: 217259																		
Start Time: 1341																		
Stop Time: 1411																		
P _{bar} (in Hg): 29.75																		
T _{ambient} (°F):																		
<table border="1"><thead><tr><th>Elapsed Time</th><th>Ball Setting</th></tr></thead><tbody><tr><td>0</td><td>0.15 CC</td></tr><tr><td>5</td><td>0.15</td></tr><tr><td>10</td><td>0.15</td></tr><tr><td>15</td><td>0.15</td></tr><tr><td>20</td><td>0.15</td></tr><tr><td>25</td><td>0.15</td></tr><tr><td>30</td><td>0.15</td></tr><tr><td>35</td><td>--</td></tr></tbody></table>	Elapsed Time	Ball Setting	0	0.15 CC	5	0.15	10	0.15	15	0.15	20	0.15	25	0.15	30	0.15	35	--
Elapsed Time	Ball Setting																	
0	0.15 CC																	
5	0.15																	
10	0.15																	
15	0.15																	
20	0.15																	
25	0.15																	
30	0.15																	
35	--																	
Sample Volume (L)	--																	
Dilution Gas (L)	--																	
Total Volume (L)	--																	

Comments:

--

Stream Name: Refinery Gas

Sample ID: 126427

Sample Point: Refinery Fuel Gas

Sample Date & Time: 12/28/2023 at 11:00

Composition of analysis by Gas Chromatography, ASTM D-1945

Test	Result, Moles %
Hydrogen	34.1090
Methane	18.1237
Ethane	7.3664
Ethylene	0.0021
Propane	12.8949
Propylene	0.0196
Propadiene	0.0000
Methyl Acetylene	0.0000
Cyclopropane	0.0000
n-Butane	14.6340
i-Butane	5.7316
1-Butylene	0.0203
Trans-2-Butylene	0.0132
IsoButylene	0.0149
1,3-Butadiene	0.0000
n-Pentane	1.8650
i-Pentane	3.1510
C6+	0.2611
Oxygen	0.1760
Nitrogen	1.5953
Carbon Monoxide	0.0000
Carbon Dioxide	0.0000
Hydrogen Sulfide	0.0000
Ammonia	0.0000
Total	100.0000

**Calculated Heating Value, Compressibility Factor and Relative Density of Gaseous Fuel,
ASTM D-3588**

Molecular Weight (M_w)	27.7530
Compressibility Factor @ STP(z)	0.9934
Ideal Gas Specific Gravity @ STP	0.9703
Real Gas Specific Gravity @ STP	0.9765
Ideal Gas Dry HHV @ STP	1628.1
Ideal Gas Dry LHV @ STP	1489.4
FOE (mBbls/SCF)	0.2671
Eq. Liq. (US Gas/SCF)	4.9185
Carbon Content (kg C/Kg Total)	0.7797



2820 Pegasus Drive, Suite 1
Bakersfield, CA 93308
Telephone# 661.399.1398
www.TRCompanies.com

Project No.: 583056
Client Name: Kern Energy
Location/Unit: Panama Lane / THI Heater
Fuel Source: Fuel Line
Fuel Type: Refinery Fuel Gas

Lab No.: --
TRC ID No.: 126427
Date Sampled: 12/28/2023 @ 11:00
Date Submitted: 12/28/2023
Date Analyzed: 12/28/2023

Analyst: Jimmy Khangura (Kern Energy)

Analyst's Signature _____

Natural Gas Composition Determined by Gas Chromatography ASTM D 1945 - 03

Constituents	mole %	weight %	CHONS	Weight %
Hydrogen	34.14	2.48	Carbon	77.95
Oxygen	0.18	0.20	Hydrogen	20.23
Nitrogen	1.60	1.61	Oxygen	0.20
Carbon Dioxide	-	-	Nitrogen	1.61
Carbon Monoxide	-	-	Sulfur	0.00
Methane	18.14	10.50	Total	100.00
Ethane	7.37	8.00		
Propane	12.91	20.54	H/C Ratio	0.26
i-Butane	5.74	12.03		
n-Butane	14.65	30.73		
i-Pentane	3.15	8.21		
n-Pentane	1.87	4.86		
n-Hexane	0.26	0.81		
Totals	100.00	100.00		

F-Factors, Heating Values, Relative Density and Compressibility Factor Determined by ASTM D3588 - 17

F-Factors	HHV	LHV		HHV	LHV
				<u>Btu/ft³</u>	<u>Btu/lb</u>
Fd-factor, dscf/MMBtu @60 °F	8,605	9,415			
Fd-factor, dscf/MMBtu @68 °F	8,737	9,560	dry	1,627.0	22,284.1
Fd-factor, dscf/MMBtu @70 °F	8,771	9,596	wet	1,598.6	21,895.3
			dry*	1,637.9	22,432.8
Fc-factor, scf CO ₂ /MMBtu @60 °F	1,115	1,220	wet*	1,609.3	22,041.4
Fc-factor, scf CO ₂ /MMBtu @68 °F	1,133	1,239			
Fc-factor, scf CO ₂ /MMBtu @70 °F	1,137	1,244			
Density, lb/ft ³	0.0730				
Specific Volume, ft ³ /lb	13.70				
Specific Gravity*	0.9630				
Compressibility Factor, Z	0.9934				

* Corrected for Compressibility (Ideal Volume)

HHV - GROSS HEATING VALUE

LHV - NET HEATING VALUE



2820 Pegasus Drive, Suite 1
Bakersfield, CA 93308
661.399.1398
www.TRCcompanies.com

Lab Analysis Report

Case Narrative

General Information

Company: Kern Energy
Project #: 583056
TRC Lab #: 1843
Analysis Date: 12/30/2023
Analyst: Jim McSweeney

Analysis

Analytes: VOC

Analytical Protocols: C1 – C3+

Analytical Notes: No problems were encountered during the analyses.

QA/QC Review: The data has been reviewed for quality assurance.
The quality control and samples specific information in this package complete and meets or exceeds the minimum requirements for acceptability.

Comments: The Gas Chromatograph used for VOC analysis was a SRI 8610C GC/FID Ser No. N12213

All samples arrived at the laboratory in a condition acceptable for analysis.

If you have any questions or concerns regarding this analysis, please feel free to contact me.



Project Number: 583056
Analysis Date(s): 12/30/23
Case Narrative Page: 2 of 2

Laboratory Certification Statements

I certify that to the best of my knowledge:

- Test data and all corresponding information have been checked for accuracy and completeness.
- Analyses have been conducted in accordance with approved protocol, reference methods and the requirements of CARB (as applicable).
- All deviations, method modifications, or analytical anomalies are summarized in the appropriate report narrative(s).
- Analysis results only represent that of the samples as received into the laboratory.
- This document contains a total of 32 pages.

This test report shall not be reproduced except in full, without the written approval of the laboratory.

Jim McSweeney December 30, 2023
Analyst Date

Jeff S. Harris January 3, 2023
Quality Assurance Review Date

CHAIN OF CUSTODY

VOC ANALYTICAL REPORT



EPA Method 18 Lab Results

Project Number: 583056.0000
Client: Kern Energy
Facility: Panama Lane
Unit/Location: THI Heater
Normal: As Found

Lab No. 1843
Test Date: 12/28/2023
Analysis Date: 12/30/2023
Analyst: Jim McSweeney (Technical Director)

Initial Calibration GC Response												
Injection #	High Calibration Standard				Mid Calibration Standard				Low Calibration Standard			
	1	2	3	Average	1	2	3	Average	1	2	3	Average
Methane	210.8326	211.9884	211.4053	211.41	63.2756	62.6972	63.0176	63	20.7652	20.8136	20.7605	20.78
Ethane	353.9618	356.7402	356.7564	355.82	107.1315	106.4737	107.3234	106.98	35.2598	34.8861	36.0836	35.41
NMNEHC	596.6005	601.654	601.8979	600.05	181.4999	180.8566	179.1339	180.5	59.3346	60.5285	59.1626	59.68
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
Total Area	1161.3949	1170.3826	1170.0596		351.907	350.0275	349.4749		115.3596	116.2282	116.0067	

Sample GC Response												
Sample ID #	Run 1 - 217257				Run 2 - 217258				Run 3 - 217259			
	1	2	3	Average	1	2	3	Average	1	2	3	Average
Methane	1.1245	1.2093	1.1036	1.15	-	-	-	-	1.1055	1.0921	1.169	1.12
Ethane	-	-	-	-	-	-	-	-	-	-	-	-
NMNEHC	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-
Total Area	1.1245	1.2093	1.1036						1.1055	1.0921	1.169	

Final Calibration GC Response												
Injection #	High Calibration Standard				Mid Calibration Standard				Low Calibration Standard			
	1	2	3	Average	1	2	3	Average	1	2	3	Average
Methane	Not Required				62.7031	62.8284	62.882	62.8	Not Required			
Ethane					107.2032	106.952	106.7544	106.97				
NMNEHC					179.2038	179.2086	181.9892	180.13				
-					-	-	-	-				
-					-	-	-	-				
Total Area					349.1101	348.989	351.6256					

GC Response Calibration Curve			Coefficient of Determination		
	Slope	Intercept	R ²	Minimum	Pass
Methane	4.218	0.000	1.0000	0.9900	Yes
Ethane	7.244	0.000	1.0000	0.9900	Yes
NMNEHC	12.173	0.000	1.0000	0.9900	Yes

Calibration Criteria			
EPA section 8.2.1.5.2.1			
Calibration Level	High	Mid	Low
Initial Calibration	5% met	5% met	5% met
EPA section 8.2.1.5.2.2			
Sample Injections	All injections met Section 8.2.1.5.2.2 requirements		
Final Calibration	Only mid final cal level required		

C ₁ - C ₃ Calibration Standards			
	Low Level	Mid Level	High Level
Methane	4.99	15.00	50.10
Ethane	4.98	14.8	49.1
NMNEHC	4.91	14.8	49.3
Gas Vendor	Tier 5 Labs	Tier 5 Labs	Tier 5 Labs
Cylinder Number	EB0056927	CC455254	CC730137
Expiration Date	3/29/2030	3/13/2031	3/29/2030

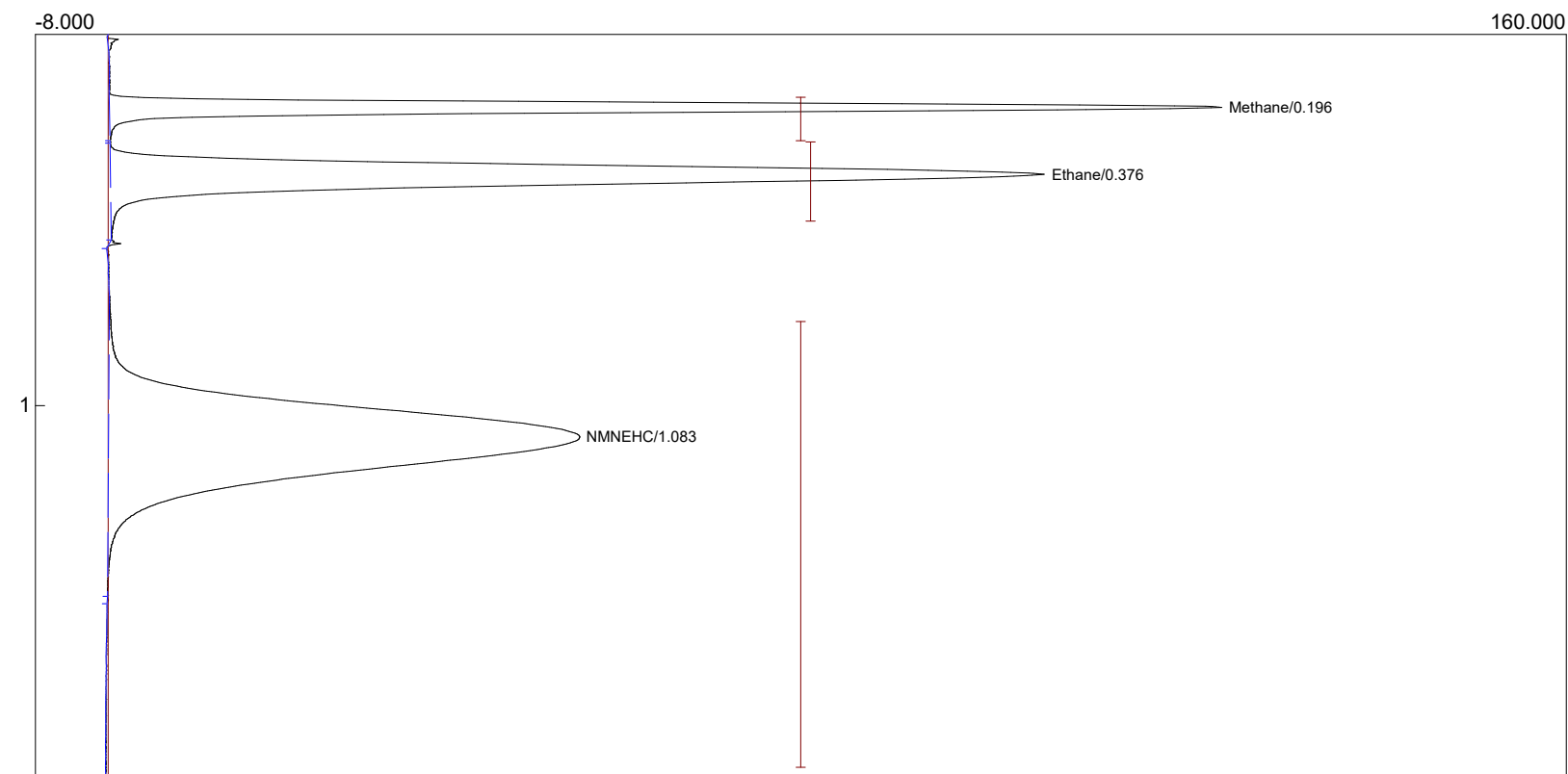
Results			
Run #	1	2	3
Sample ID #	217257	217258	217259
Methane (ppmw)	0.3	ND < 0.1	0.3
Ethane (ppmw)	ND < 0.1	ND < 0.1	ND < 0.1
NMNEHC (ppmw)	ND < 0.1	ND < 0.1	ND < 0.1

EPA M18 section 8.2.1.5.2.1 - "The results are acceptable when the peak areas for the three injections agree to within 5 percent of their average. If they do not agree, run additional samples or correct the analytical techniques until this requirement is met. Then analyze the other two calibration mixtures in the same manner."

EPA M18 section 8.2.1.5.2.2 - "After all samples have been analyzed, repeat the analysis of the mid-level calibration gas for each compound. Compare the average response factor of the pre- and post-test analysis for each compound. If they differ by > 5 percent, analyze the other calibration gas levels for that compound, and prepare a calibration curve using all the pre- and post-test calibration gas mixture values."

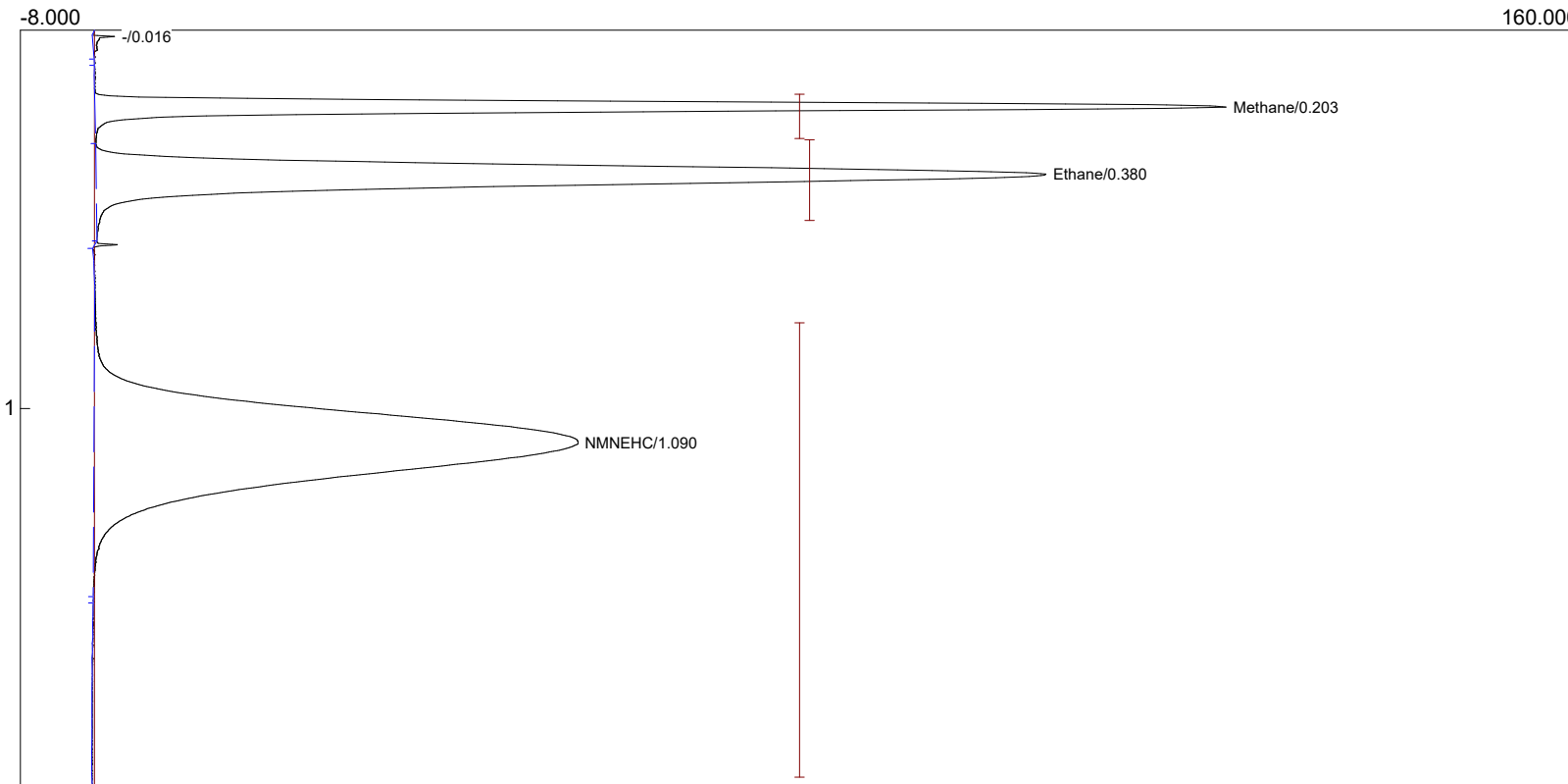
VOC CHROMATOGRAMS

Lab name: TRC Bakersfield
 Client: Calibration
 Client ID:
 Analysis date: 12/30/2023 12:29:03
 Description: FID-CHANNEL 1
 Data file: Lab_1843_00.CHR ()
 Sample: ICal 50 ppm Inj 1
 Operator: J McSweeney, QI



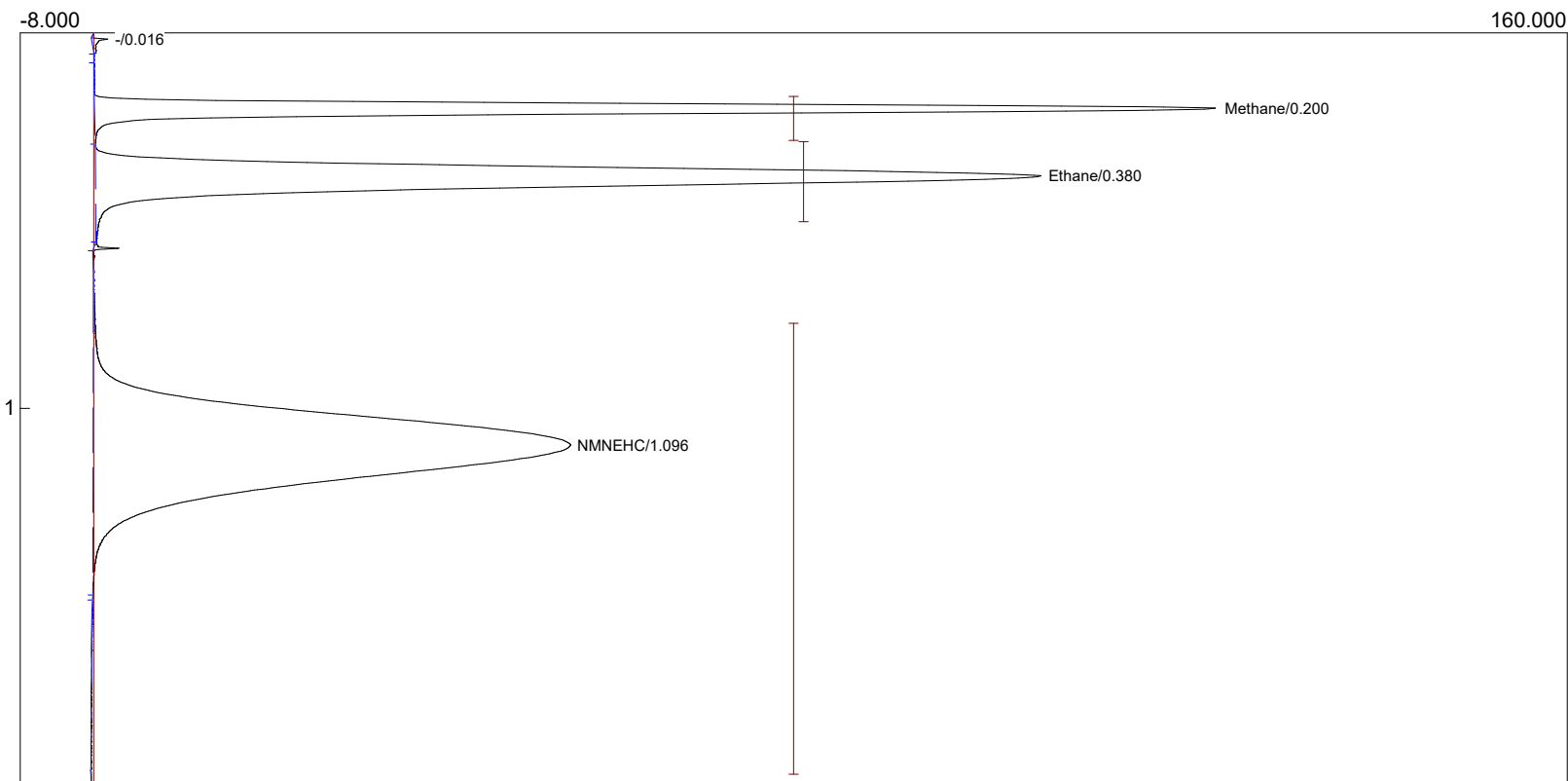
Component	Retention	Area
Methane	0.196	210.8326
Ethane	0.376	353.9618
NMNEHC	1.083	596.6005
		1161.3949

Lab name: TRC Bakersfield
Client: Calibration
Client ID:
Analysis date: 12/30/2023 12:34:54
Description: FID-CHANNEL 1
Data file: Lab_1843_01.CHR ()
Sample: ICal 50 ppm Inj 2
Operator: J McSweeney, QI



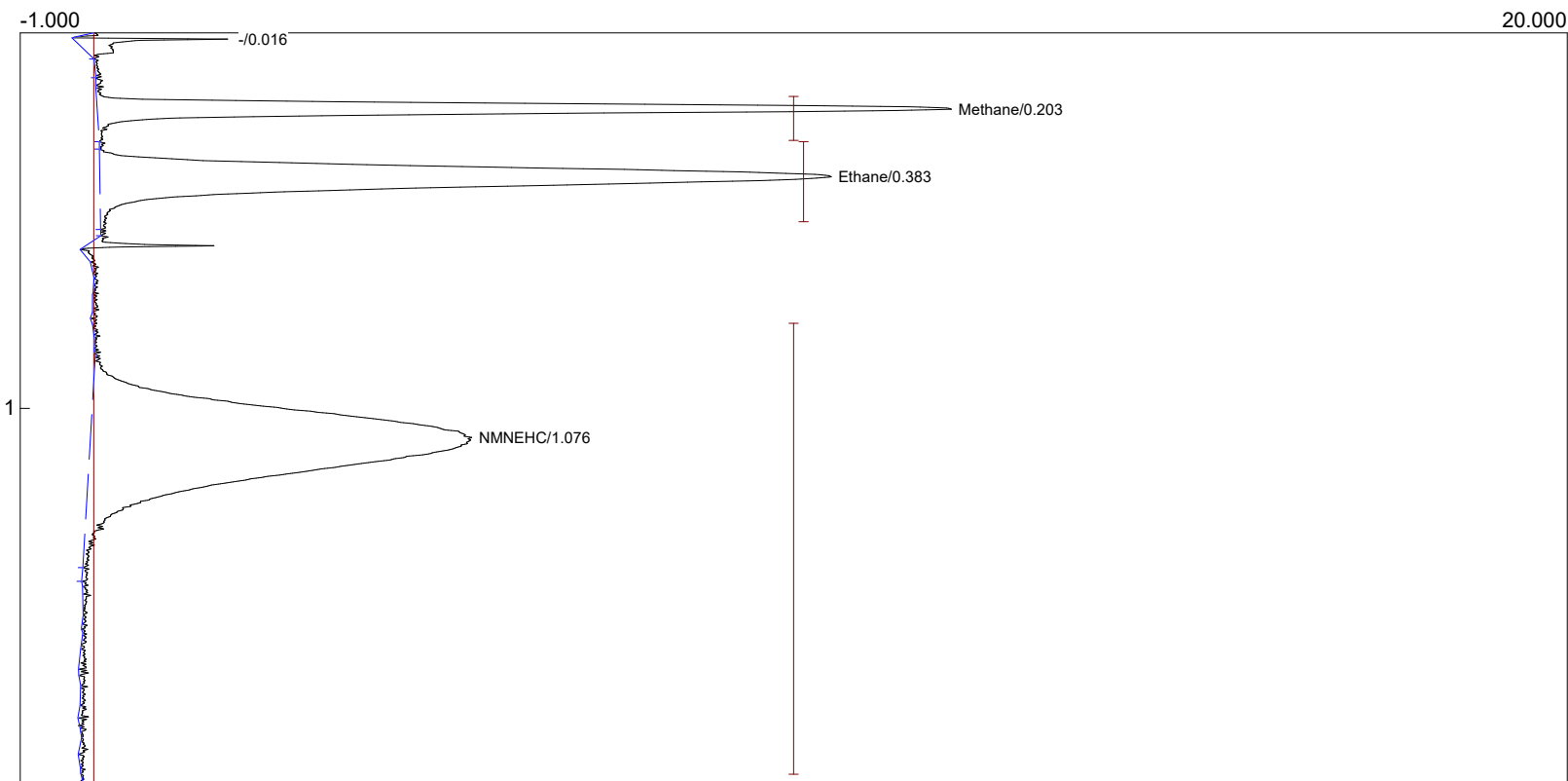
Component	Retention	Area
Methane	0.203	211.9884
Ethane	0.380	356.7402
NMNEHC	1.090	601.6540
		1170.3826

Lab name: TRC Bakersfield
Client: Calibration
Client ID:
Analysis date: 12/30/2023 12:38:10
Description: FID-CHANNEL 1
Data file: Lab_1843_02.CHR ()
Sample: ICal 50 ppm Inj 3
Operator: J McSweeney, QI



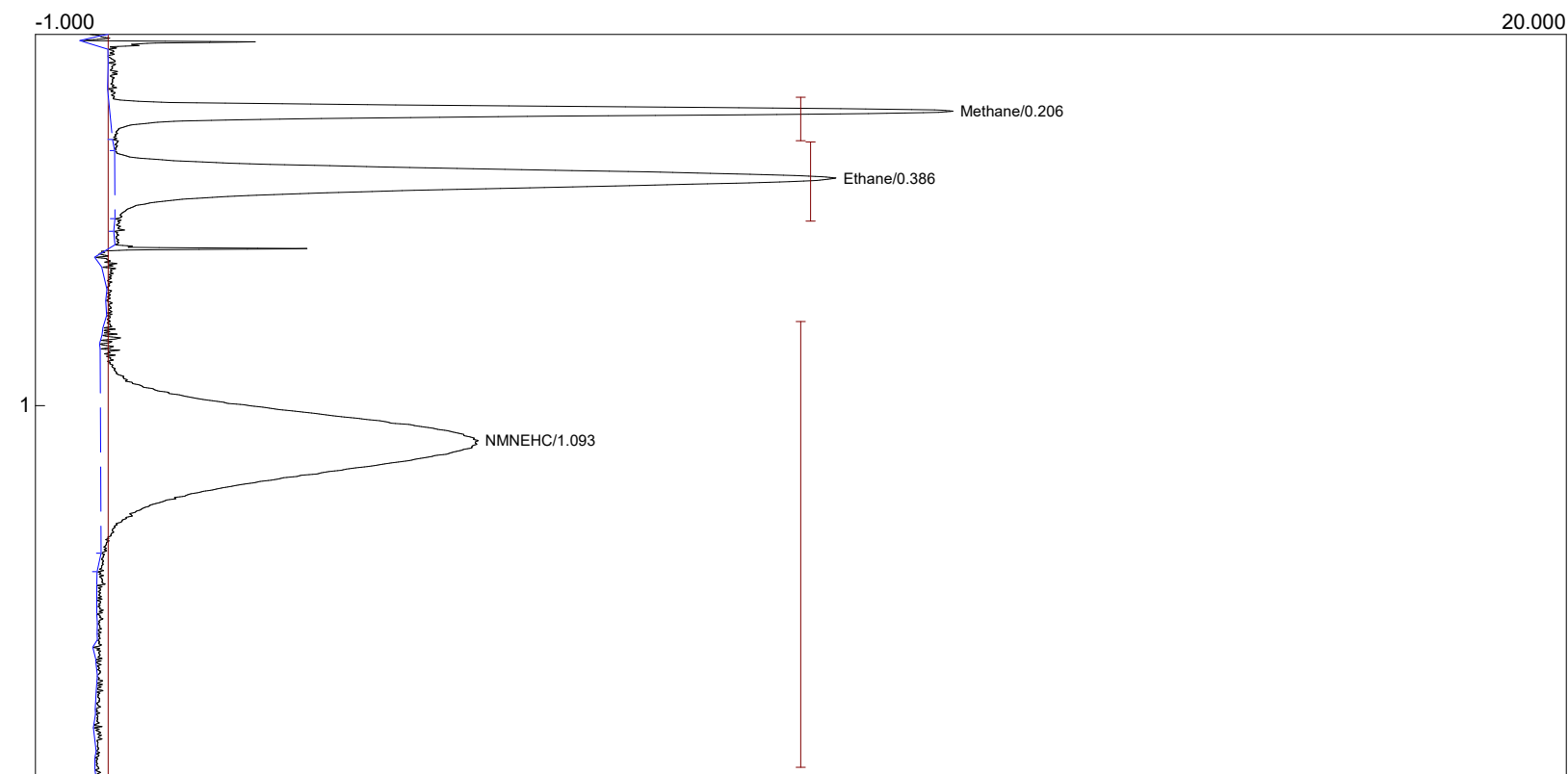
Component	Retention	Area
Methane	0.200	211.4053
Ethane	0.380	356.7564
NMNEHC	1.096	601.8979
		1170.0596

Lab name: TRC Bakersfield
 Client: Calibration
 Client ID:
 Analysis date: 12/30/2023 12:47:49
 Description: FID-CHANNEL 1
 Data file: Lab_1843_03.CHR ()
 Sample: ICal 5 ppm Inj 1
 Operator: J McSweeney, QI



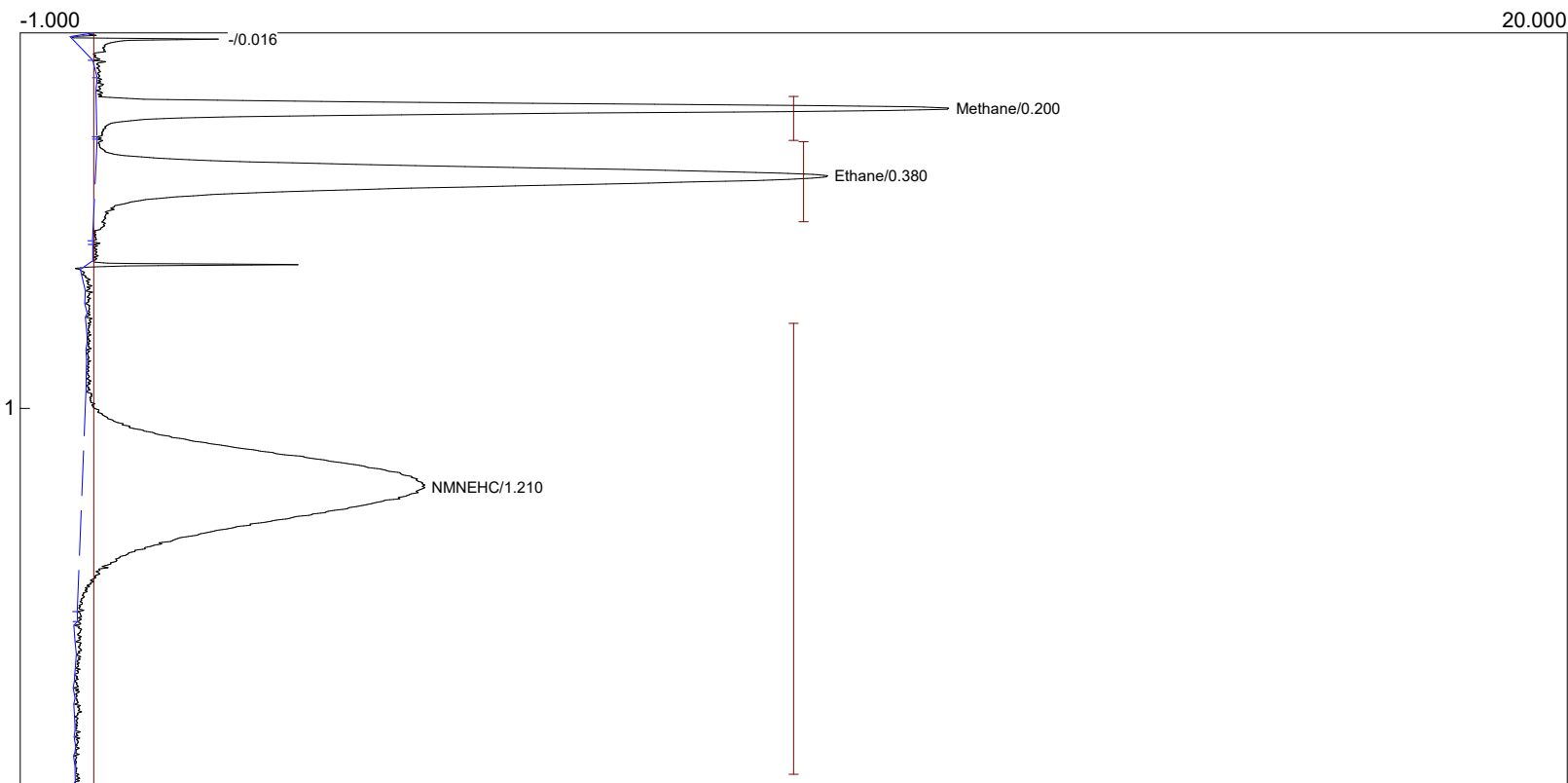
Component	Retention	Area
Methane	0.203	20.7652
Ethane	0.383	35.2598
NMNEHC	1.076	59.3346
		115.3596

Lab name: TRC Bakersfield
Client: Calibration
Client ID:
Analysis date: 12/30/2023 12:51:42
Description: FID-CHANNEL 1
Data file: Lab_1843_04.CHR ()
Sample: ICal 5 ppm Inj 2
Operator: J McSweeney, QI



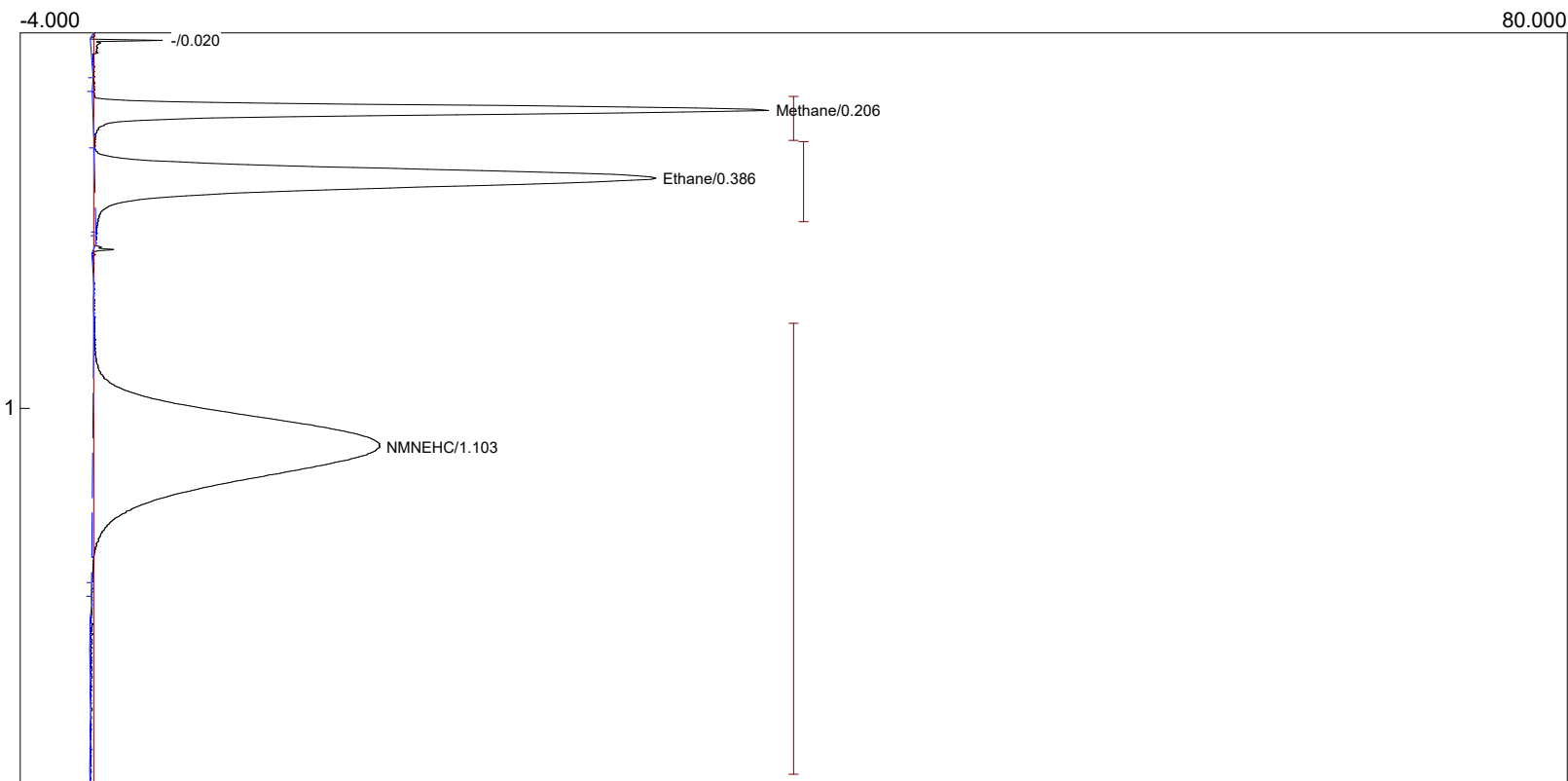
Component	Retention	Area
Methane	0.206	20.8136
Ethane	0.386	34.8861
NMNEHC	1.093	60.5285
		116.2282

Lab name: TRC Bakersfield
 Client: Calibration
 Client ID:
 Analysis date: 12/30/2023 12:54:21
 Description: FID-CHANNEL 1
 Data file: Lab_1843_05.CHR ()
 Sample: ICal 5 ppm Inj 3
 Operator: J McSweeney, QI



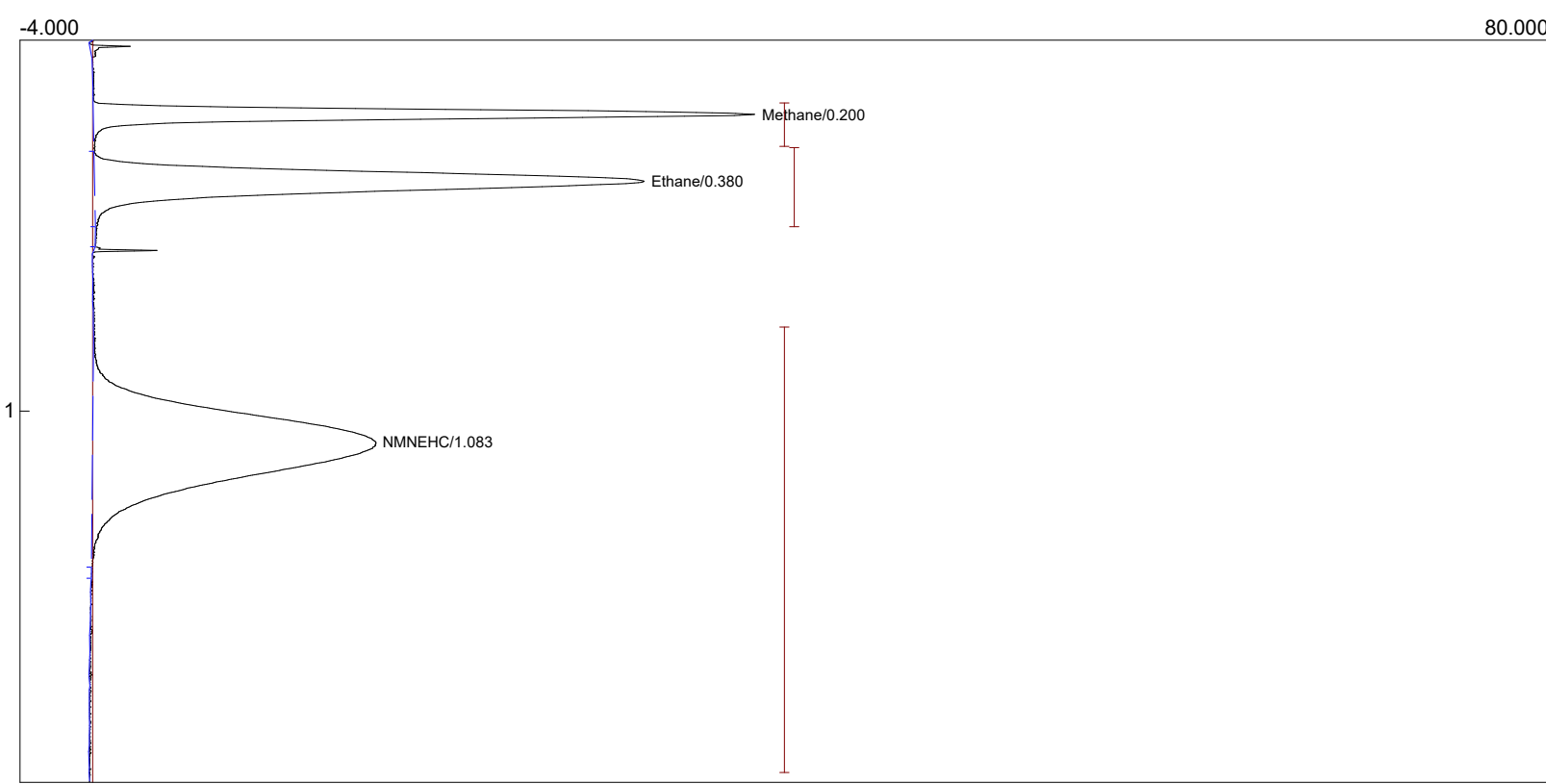
Component	Retention	Area
Methane	0.200	20.7605
Ethane	0.380	36.0836
NMNEHC	1.210	59.1626
		116.0067

Lab name: TRC Bakersfield
Client: Calibration
Client ID:
Analysis date: 12/30/2023 12:59:38
Description: FID-CHANNEL 1
Data file: Lab_1843_06.CHR ()
Sample: ICal 15 ppm Inj 1
Operator: J McSweeney, QI



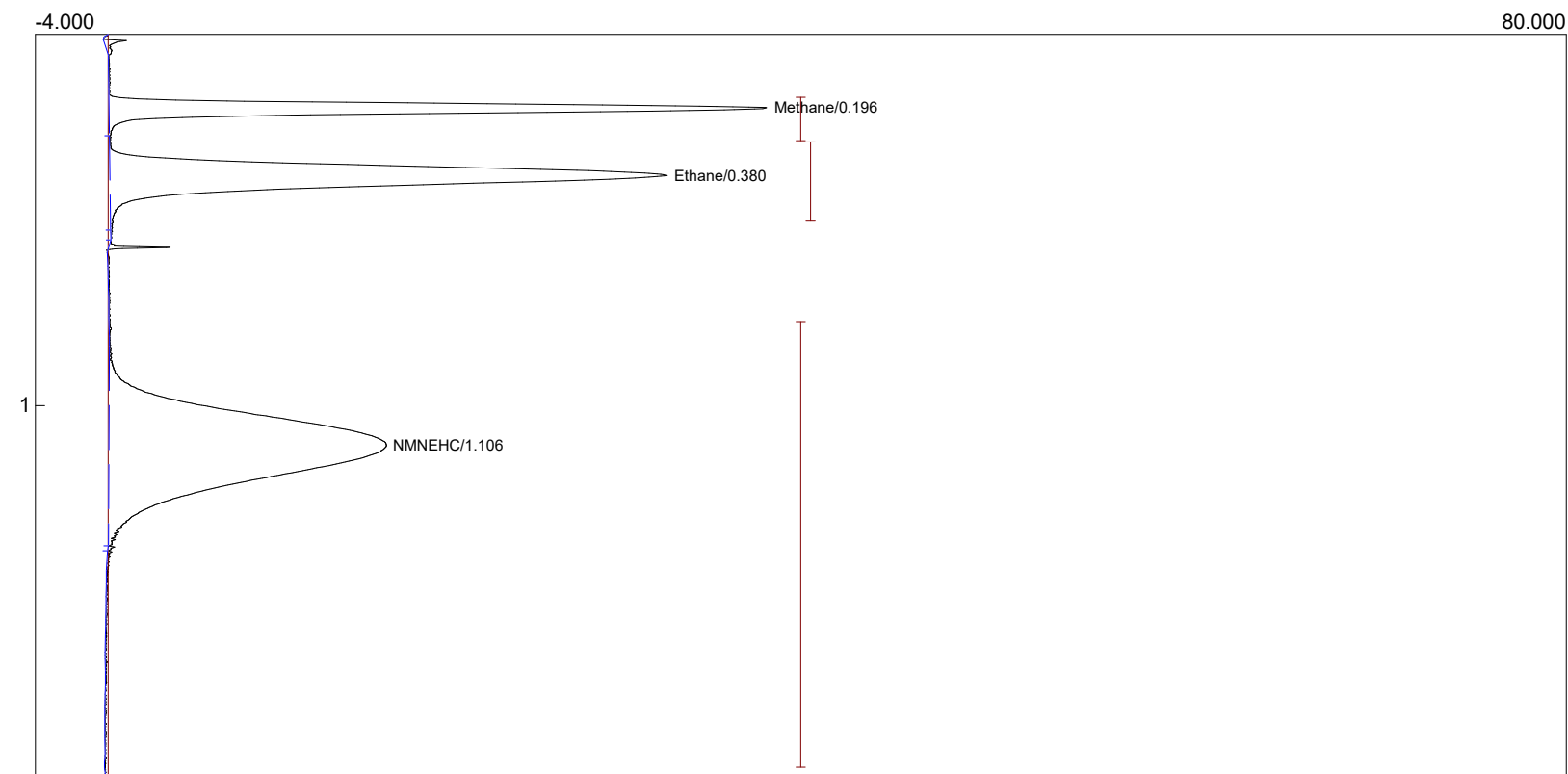
Component	Retention	Area
Methane	0.206	63.2756
Ethane	0.386	107.1315
NMNEHC	1.103	181.4999
		351.9070

Lab name: TRC Bakersfield
Client: Calibration
Client ID:
Analysis date: 12/30/2023 13:04:46
Description: FID-CHANNEL 1
Data file: Lab_1843_07.CHR ()
Sample: ICal 15 ppm Inj 2
Operator: J McSweeney, QI



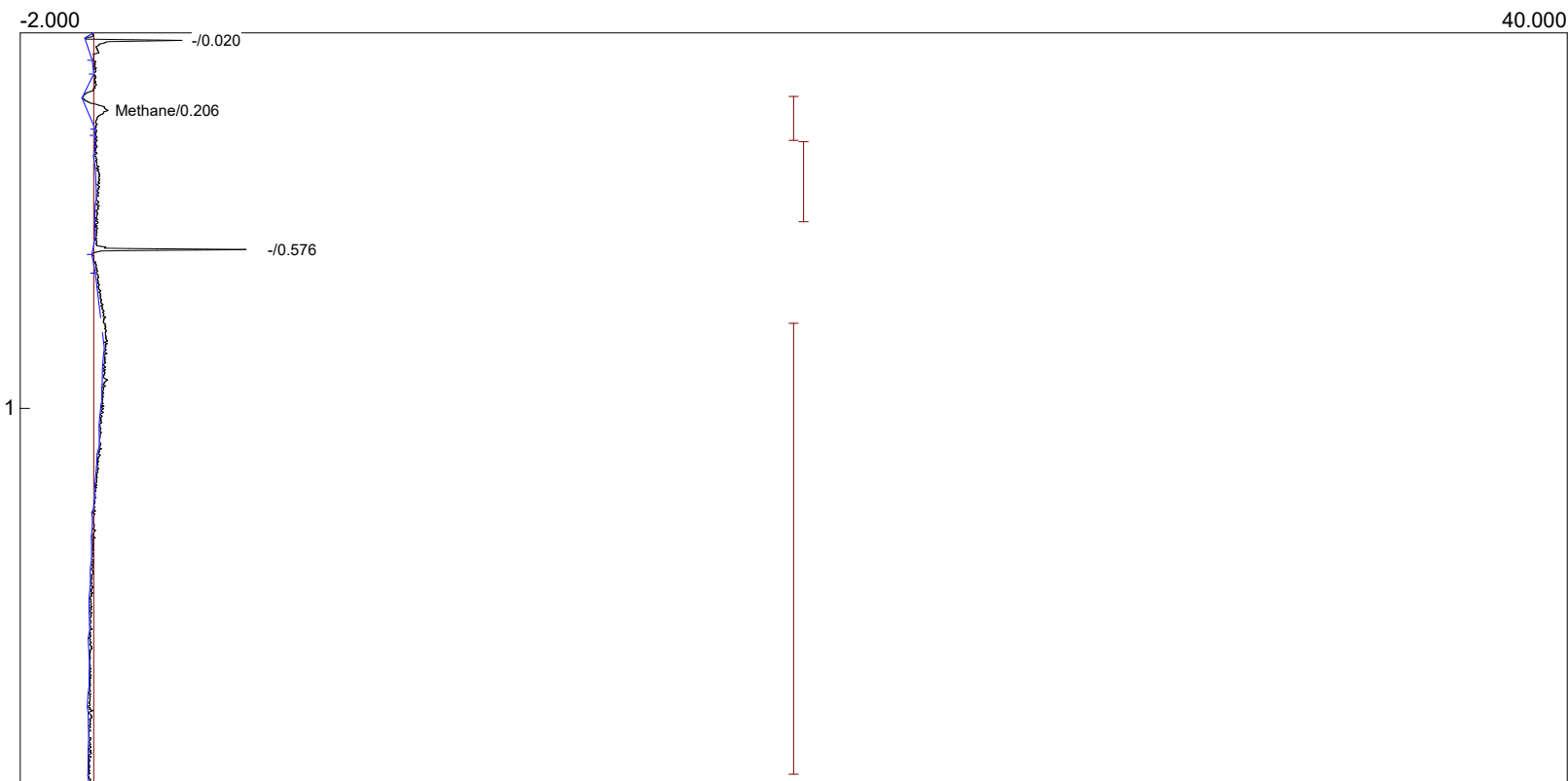
Component	Retention	Area
Methane	0.200	62.6972
Ethane	0.380	106.4737
NMNEHC	1.083	180.8566
		350.0275

Lab name: TRC Bakersfield
Client: Calibration
Client ID:
Analysis date: 12/30/2023 13:07:15
Description: FID-CHANNEL 1
Data file: Lab_1843_08.CHR ()
Sample: ICal 15 ppm Inj 3
Operator: J McSweeney, QI



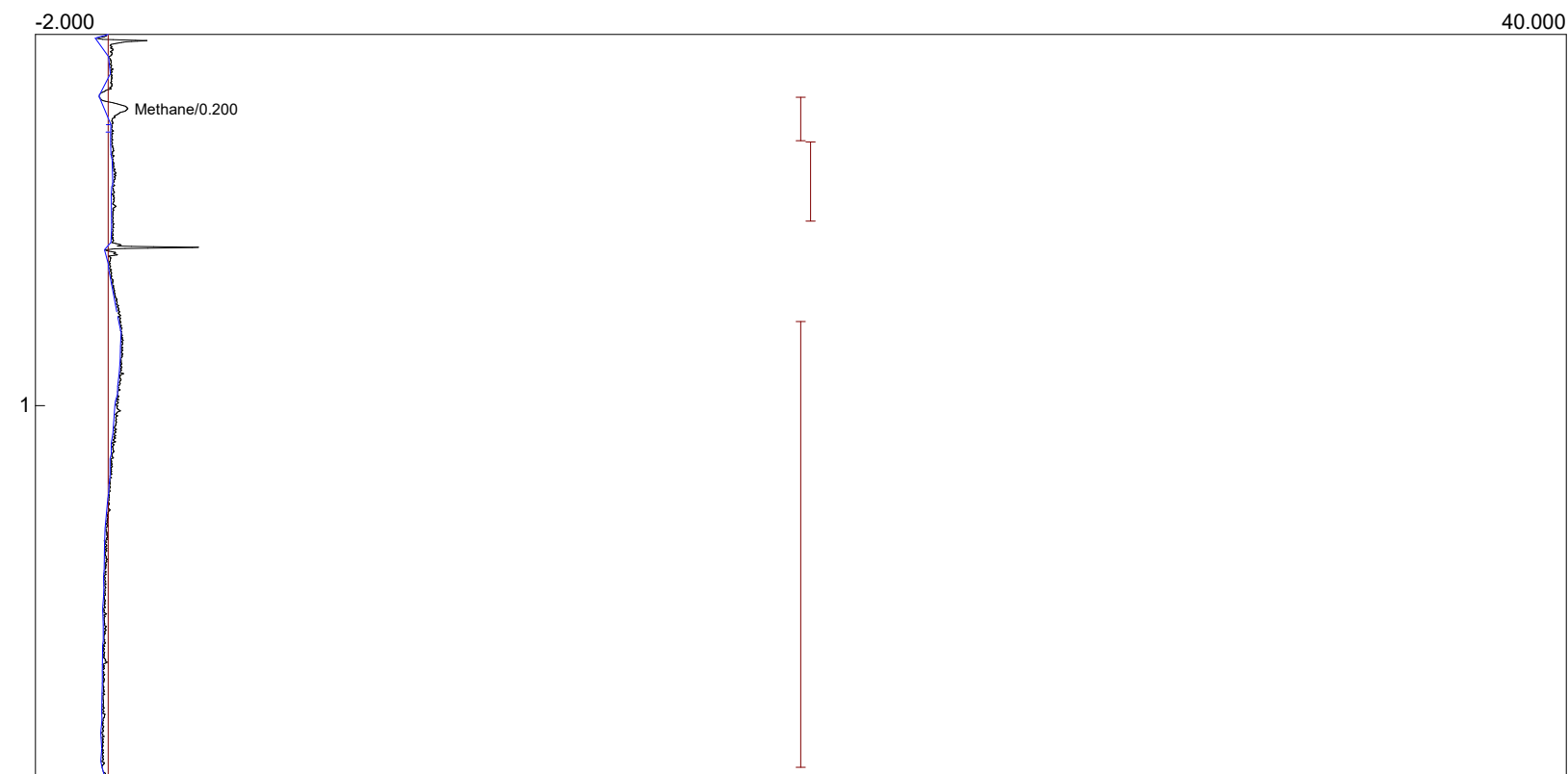
Component	Retention	Area
Methane	0.196	63.0176
Ethane	0.380	107.3234
NMNEHC	1.106	179.1339
		349.4749

Lab name: TRC Bakersfield
Client: Kern Energy
Client ID: THI Heater
Analysis date: 12/30/2023 13:11:00
Description: FID-CHANNEL 1
Data file: Lab_1843_09.CHR ()
Sample: 217257 Run 1 Inj 1
Operator: J McSweeney, QI



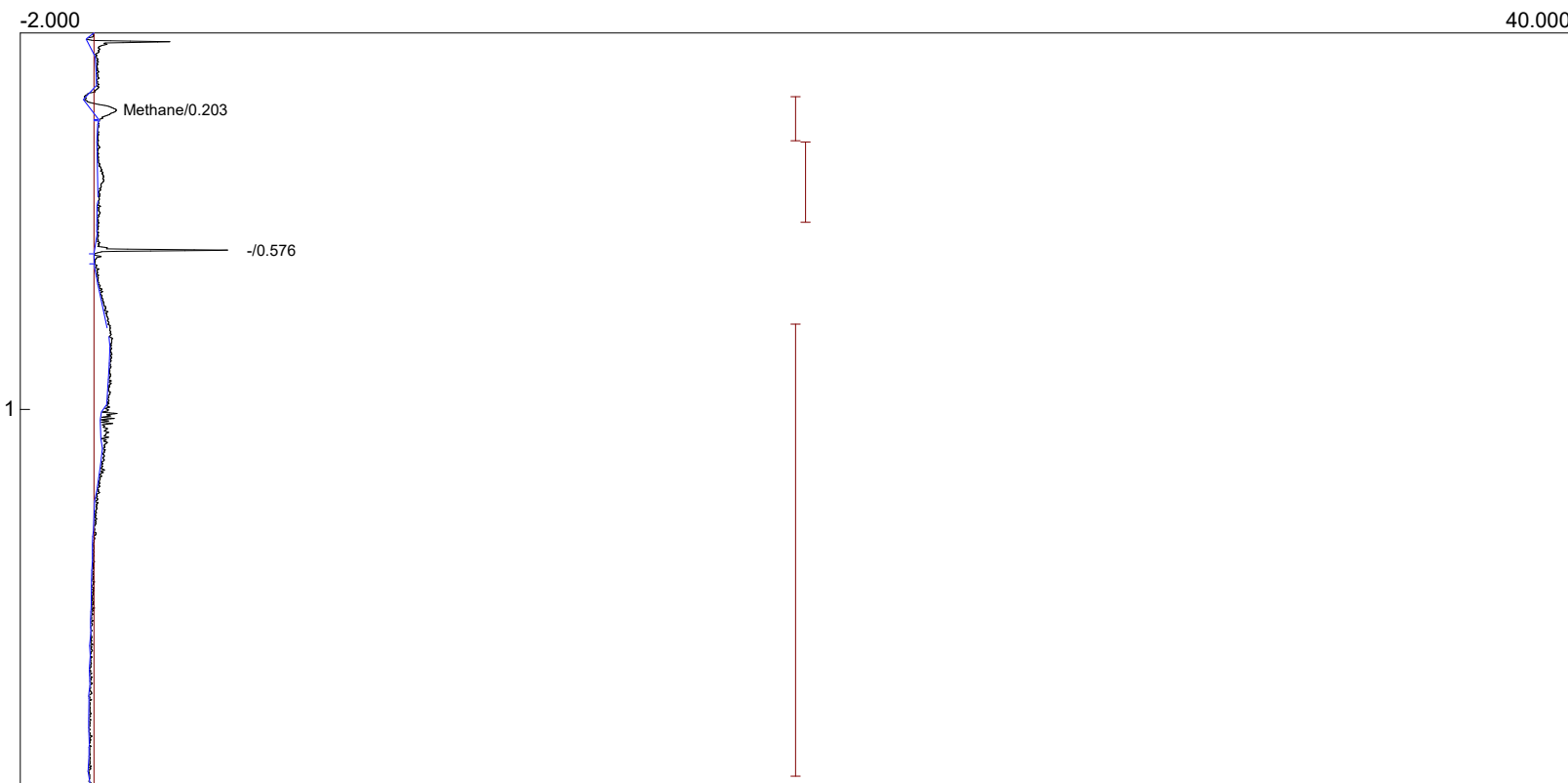
Component	Retention	Area
Methane	0.206	1.1245
		1.1245

Lab name: TRC Bakersfield
Client: Kern Energy
Client ID: THI Heater
Analysis date: 12/30/2023 13:14:00
Description: FID-CHANNEL 1
Data file: Lab_1843_10.CHR ()
Sample: 217257 Run 1 Inj 2
Operator: J McSweeney, QI



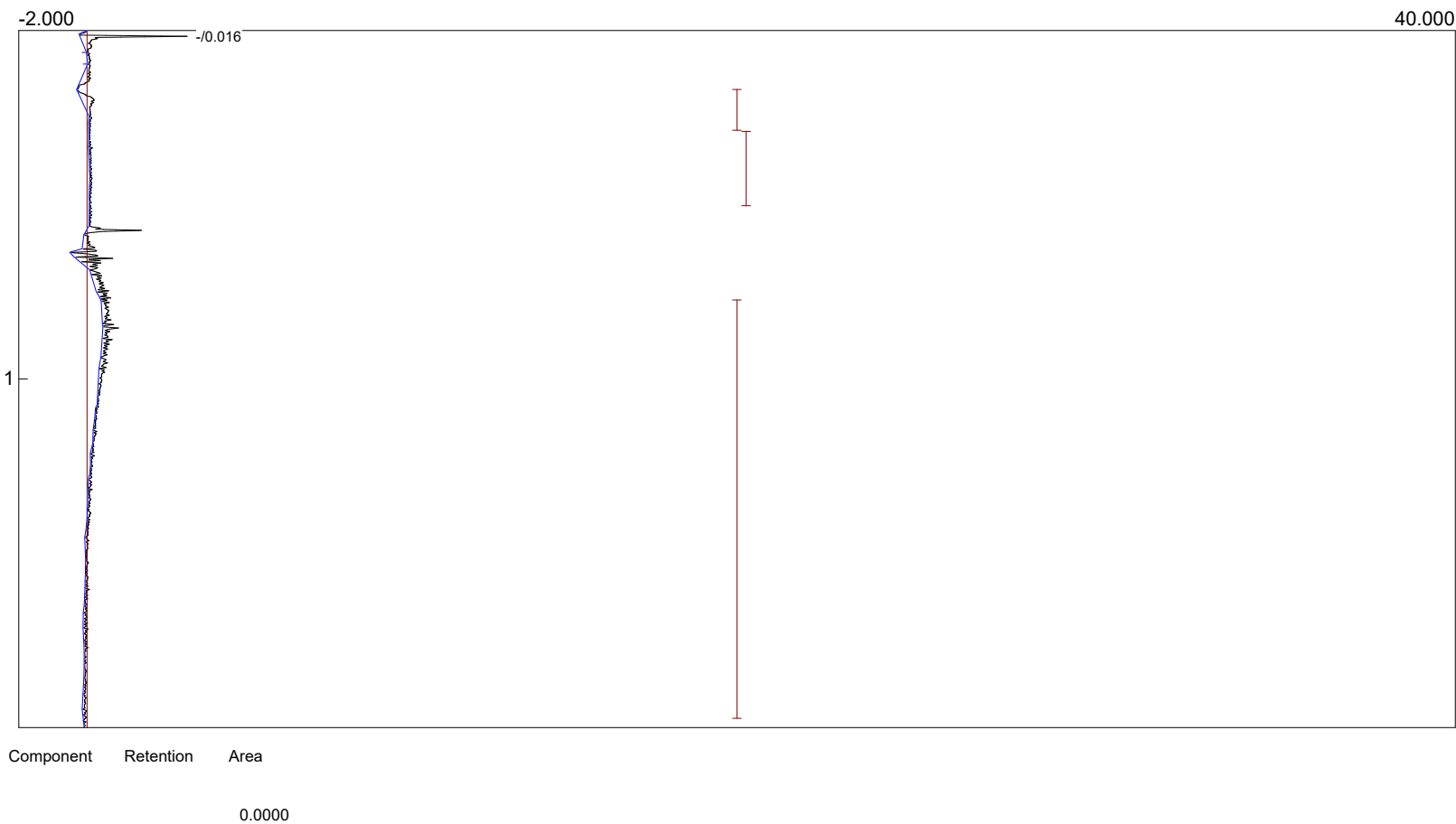
Component	Retention	Area
Methane	0.200	1.2093
		1.2093

Lab name: TRC Bakersfield
Client: Kern Energy
Client ID: THI Heater
Analysis date: 12/30/2023 13:16:30
Description: FID-CHANNEL 1
Data file: Lab_1843_11.CHR ()
Sample: 217257 Run 1 Inj 3
Operator: J McSweeney, QI

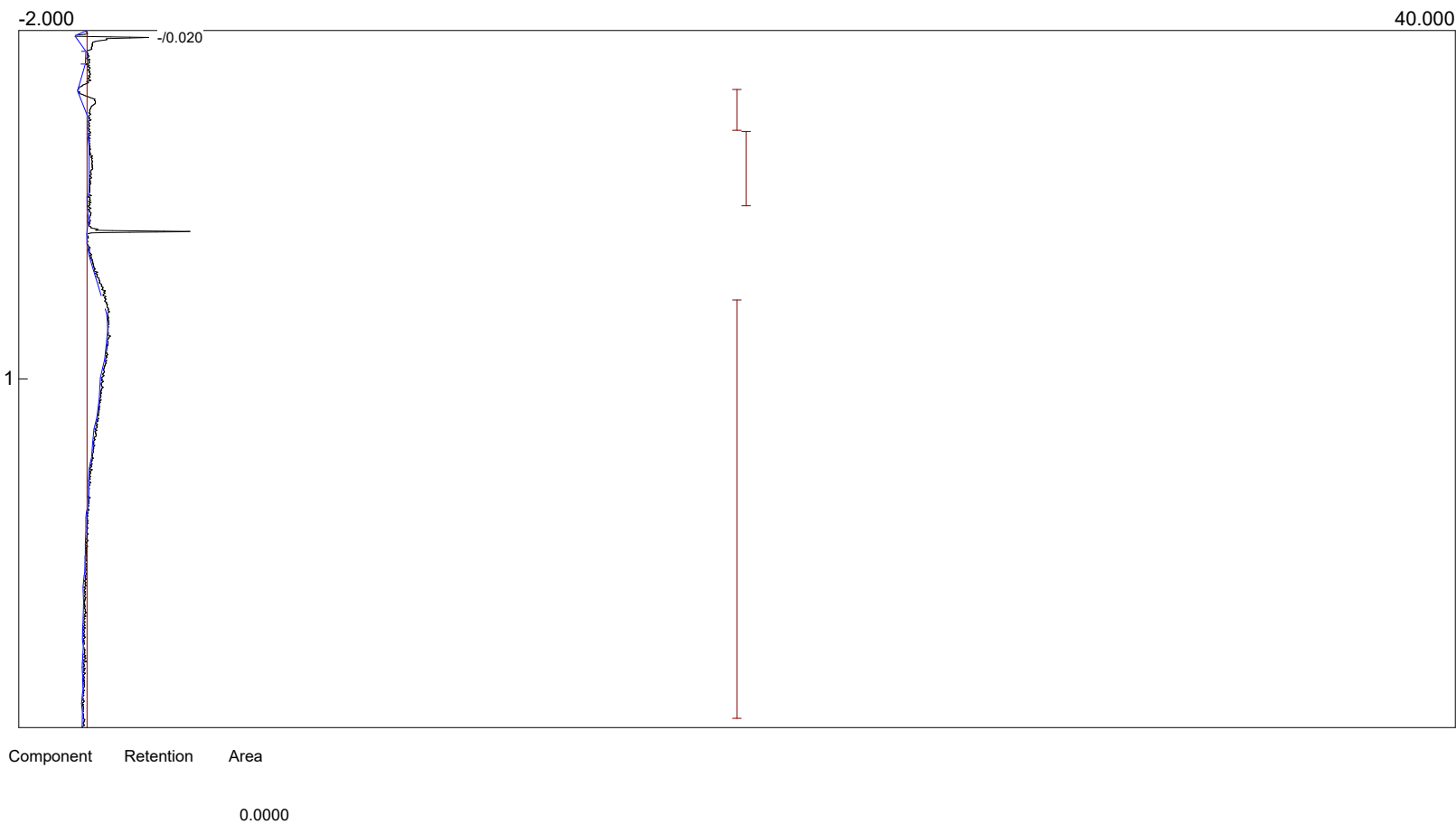


Component	Retention	Area
Methane	0.203	1.1036
		1.1036

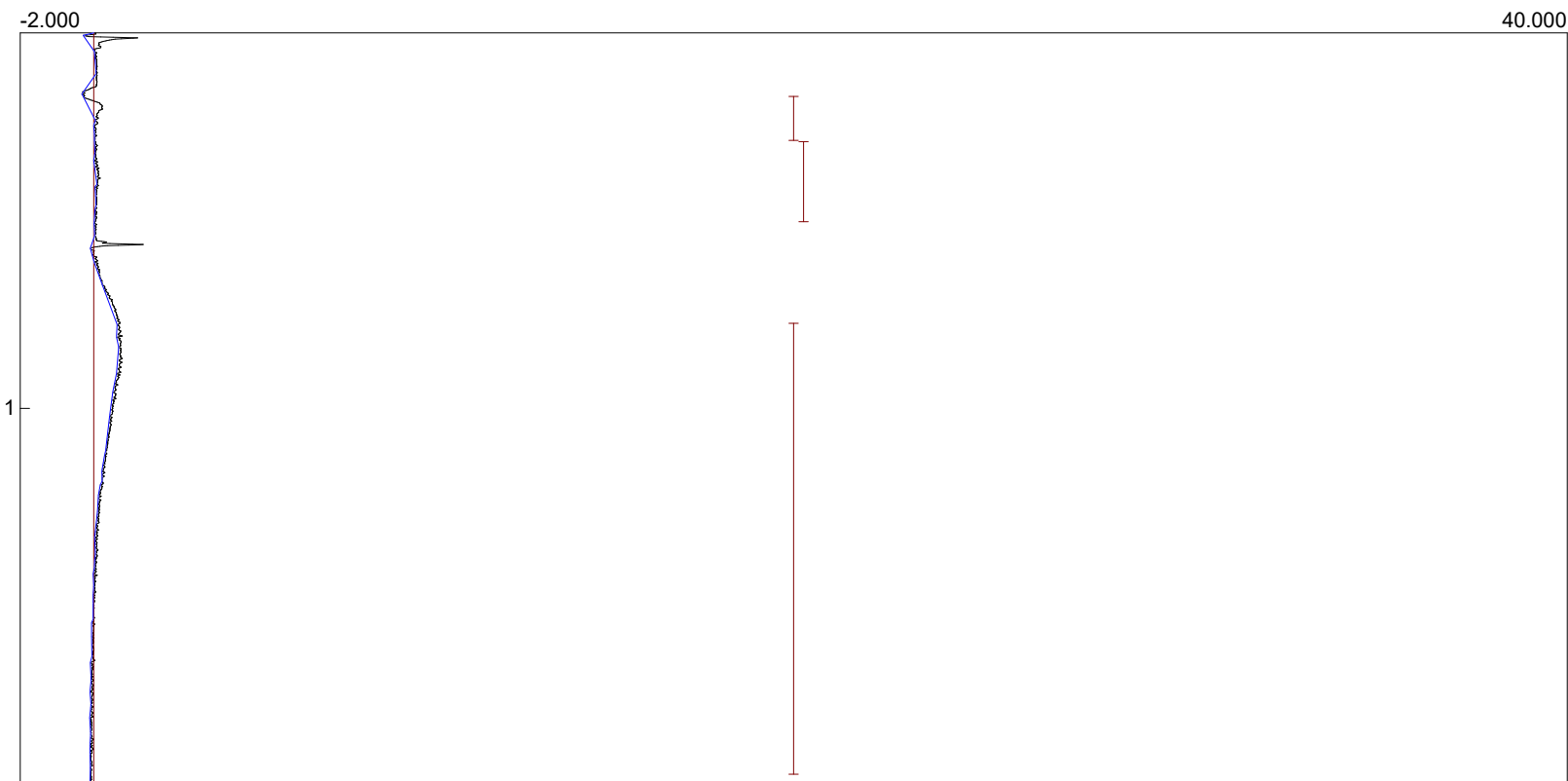
Lab name: TRC Bakersfield
Client: Kern Energy
Client ID: THI Heater
Analysis date: 12/30/2023 13:21:11
Description: FID-CHANNEL 1
Data file: Lab_1843_12.CHR ()
Sample: 217258 Run 2 Inj 1
Operator: J McSweeney, QI



Lab name: TRC Bakersfield
Client: Kern Energy
Client ID: THI Heater
Analysis date: 12/30/2023 13:24:46
Description: FID-CHANNEL 1
Data file: Lab_1843_13.CHR ()
Sample: 217258 Run 2 Inj 2
Operator: J McSweeney, QI



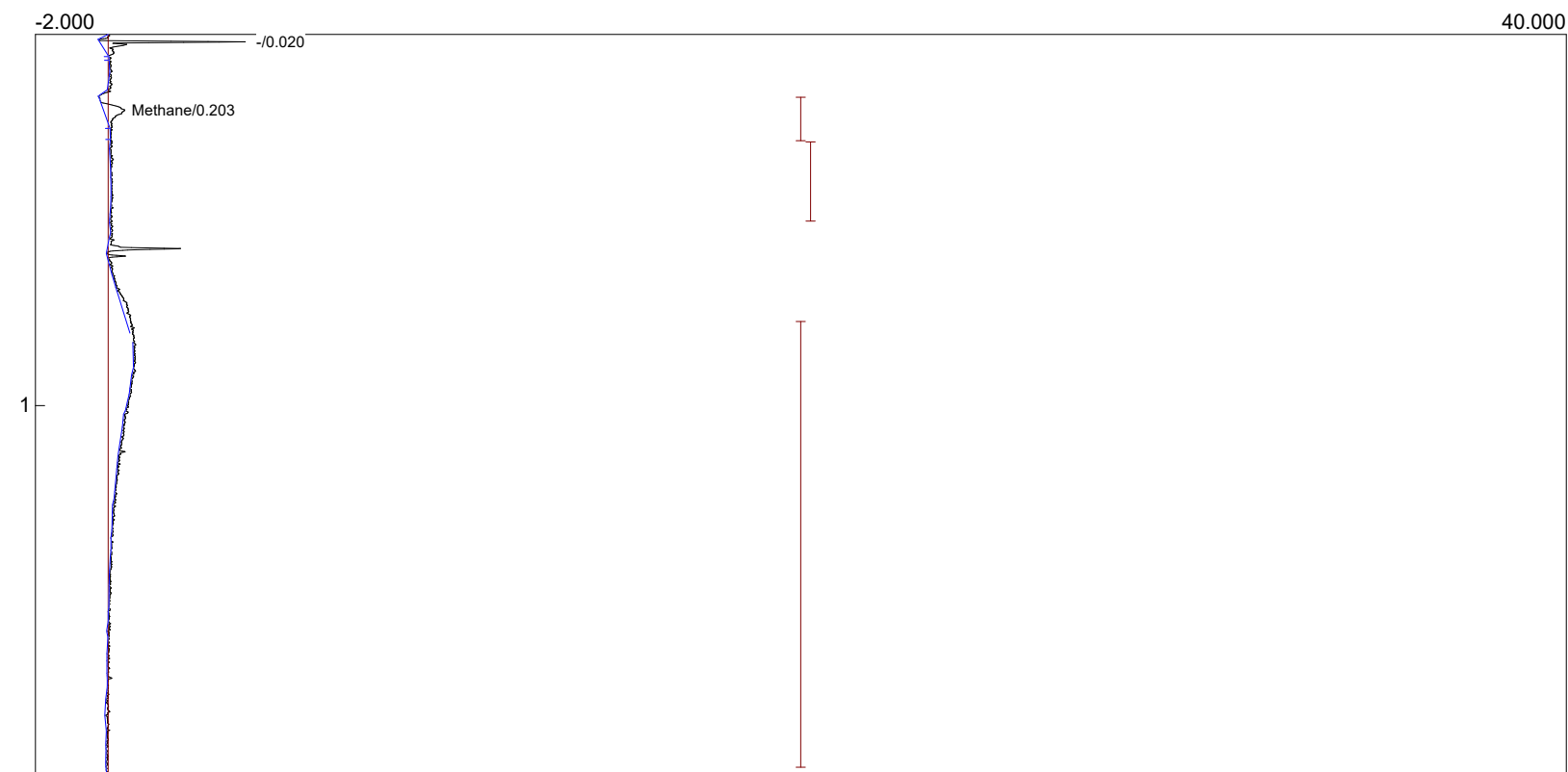
Lab name: TRC Bakersfield
Client: Kern Energy
Client ID: THI Heater
Analysis date: 12/30/2023 13:27:11
Description: FID-CHANNEL 1
Data file: Lab_1843_14.CHR ()
Sample: 217258 Run 2 Inj 3
Operator: J McSweeney, QI



Component	Retention	Area
-----------	-----------	------

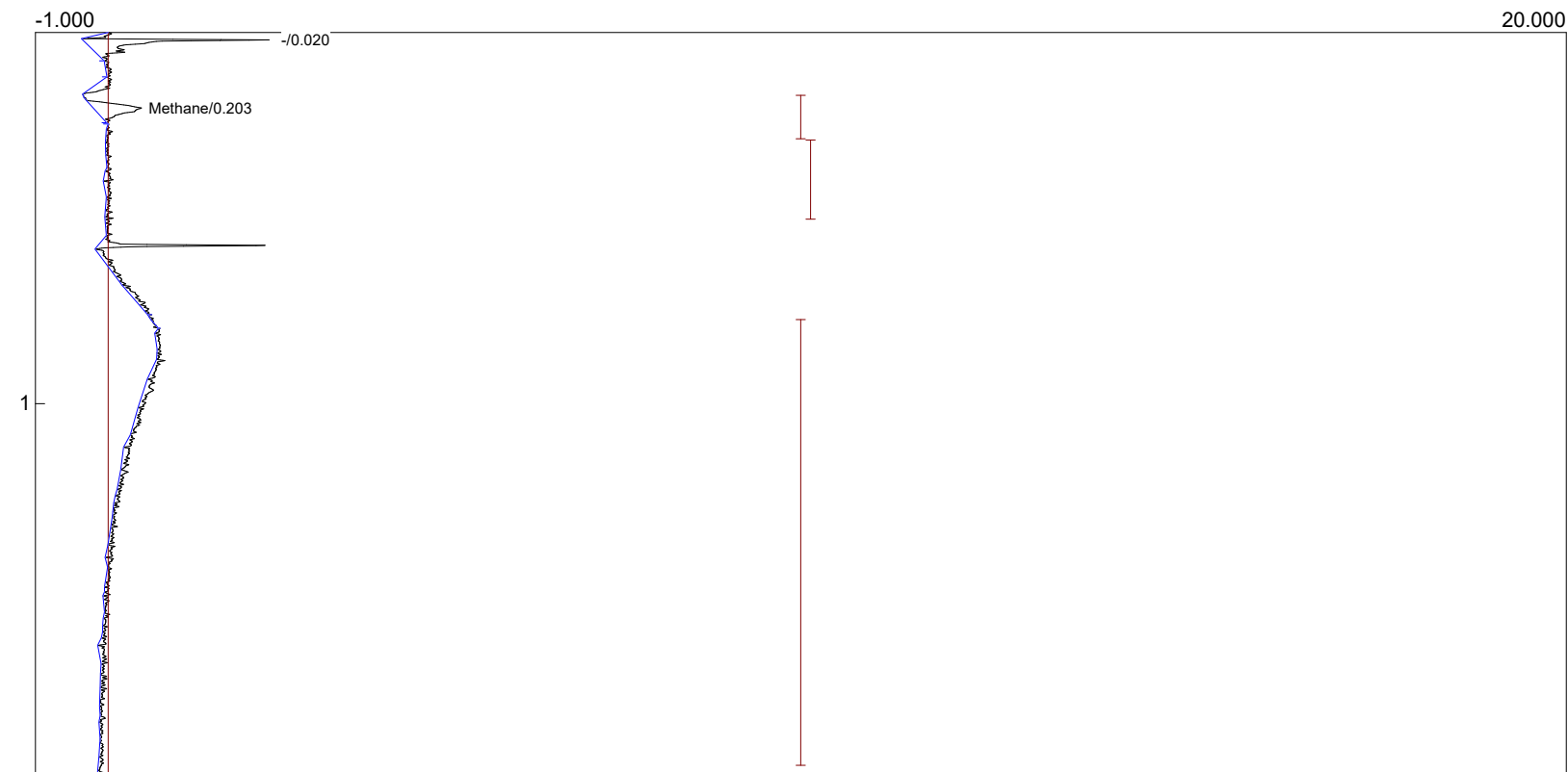
		0.0000
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Lab name: TRC Bakersfield
 Client: Kern Energy
 Client ID: THI Heater
 Analysis date: 12/30/2023 13:32:58
 Description: FID-CHANNEL 1
 Data file: Lab_1843_15.CHR ()
 Sample: 217259 Run 3 Inj 1
 Operator: J McSweeney, QI



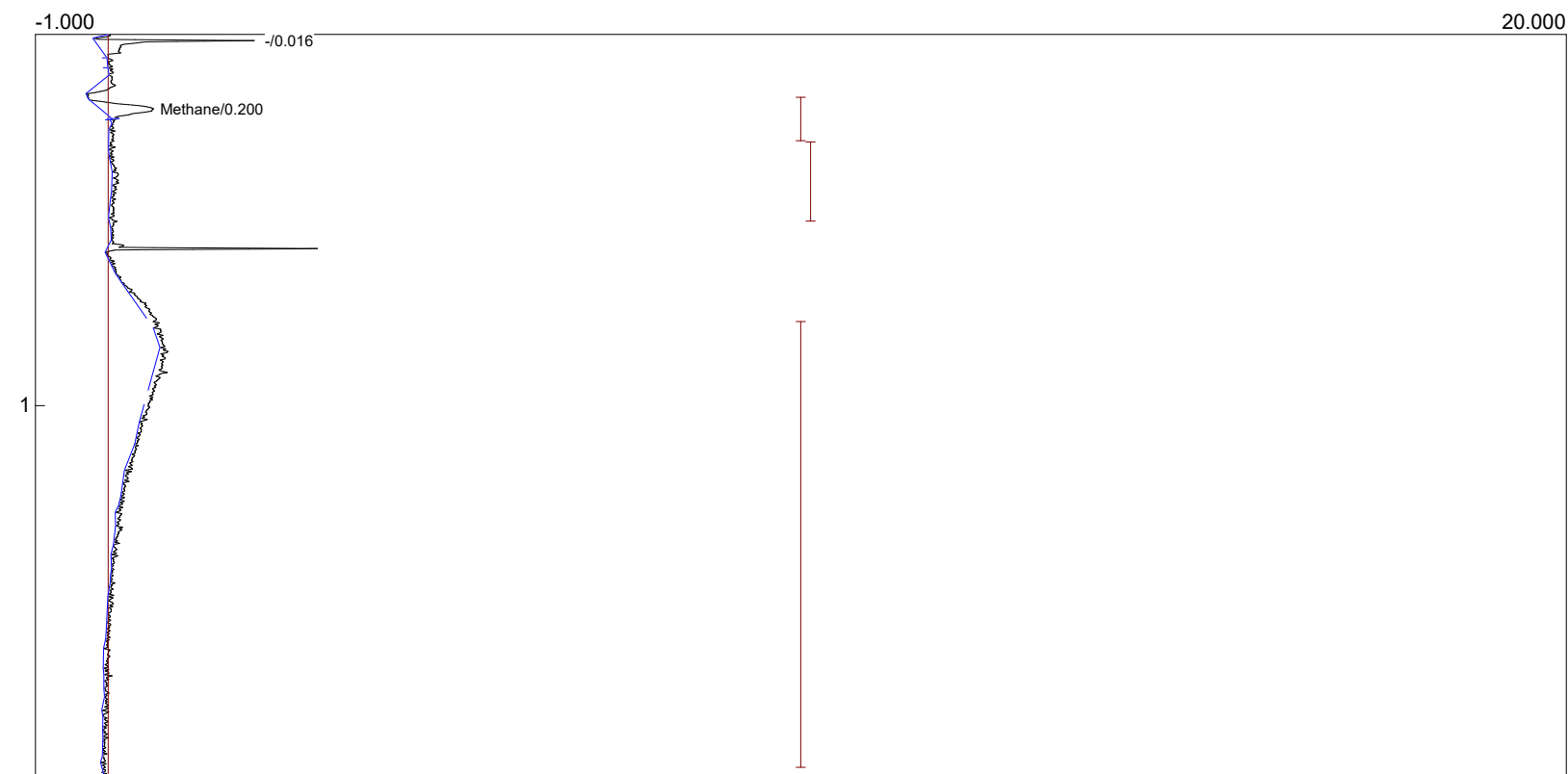
Component	Retention	Area
Methane	0.203	1.1055
		1.1055

Lab name: TRC Bakersfield
Client: Kern Energy
Client ID: THI Heater
Analysis date: 12/30/2023 13:36:33
Description: FID-CHANNEL 1
Data file: Lab_1843_16.CHR ()
Sample: 217259 Run 3 Inj 2
Operator: J McSweeney, QI



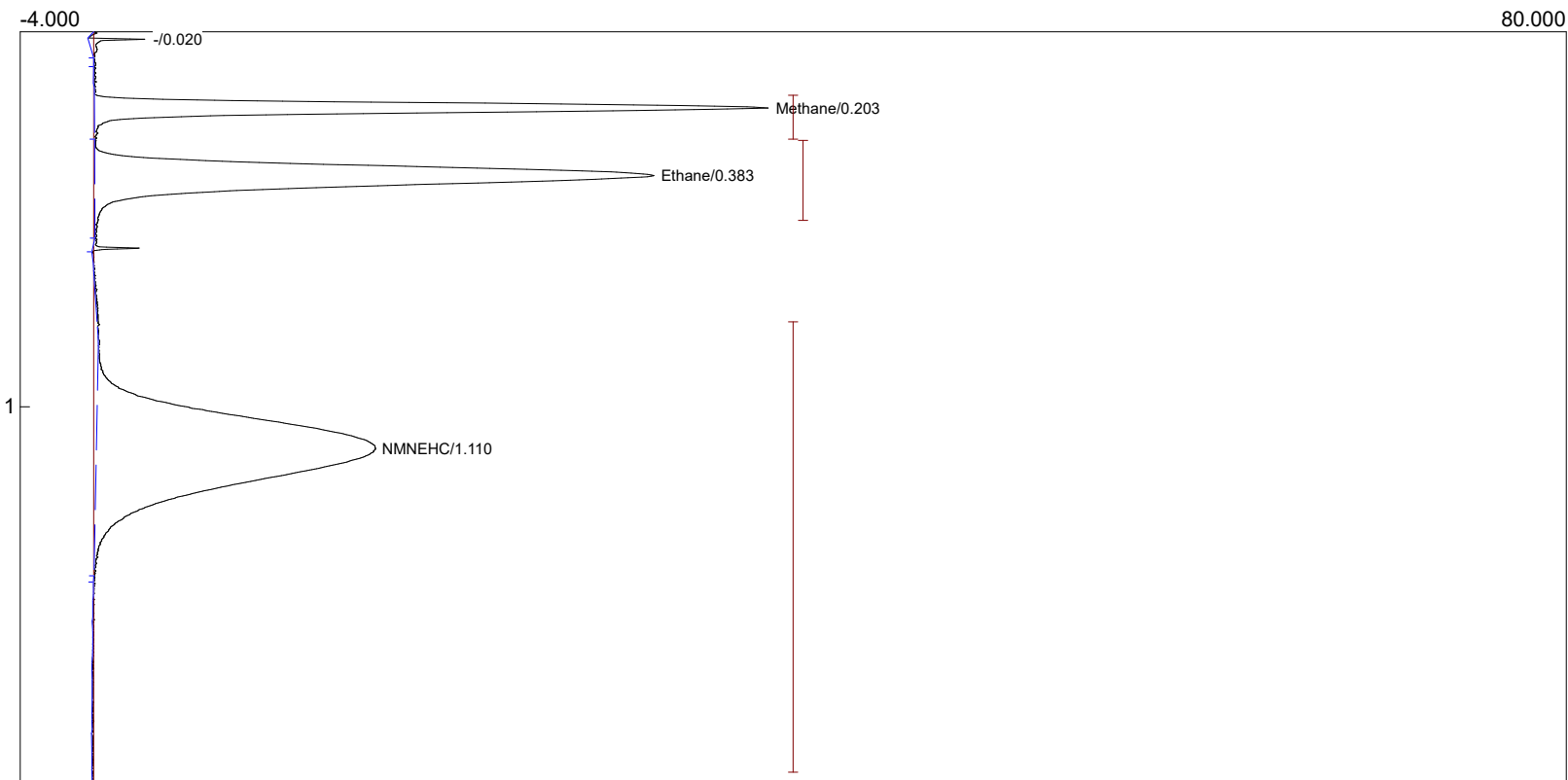
Component	Retention	Area
Methane	0.203	1.0921
		1.0921

Lab name: TRC Bakersfield
Client: Kern Energy
Client ID: THI Heater
Analysis date: 12/30/2023 13:41:32
Description: FID-CHANNEL 1
Data file: Lab_1843_17.CHR ()
Sample: 217259 Run 3 Inj 3
Operator: J McSweeney, QI



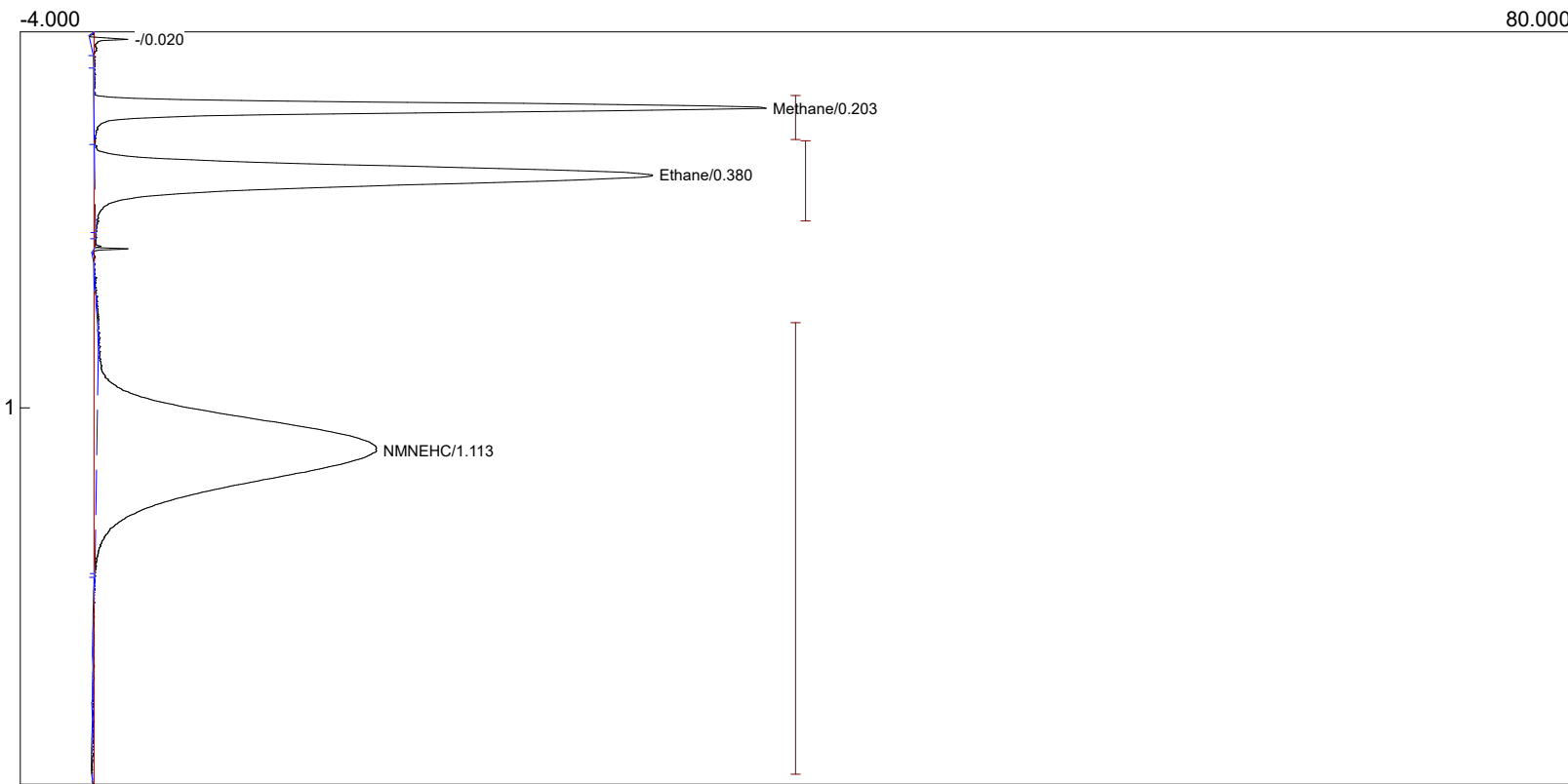
Component	Retention	Area
Methane	0.200	1.1690
		1.1690

Lab name: TRC Bakersfield
Client: Calibration
Analysis date: 12/30/2023 13:45:14
Description: FID-CHANNEL 1
Data file: Lab_1843_18.CHR ()
Sample: FCal 15 ppm Inj 1
Operator: J McSweeney, QI



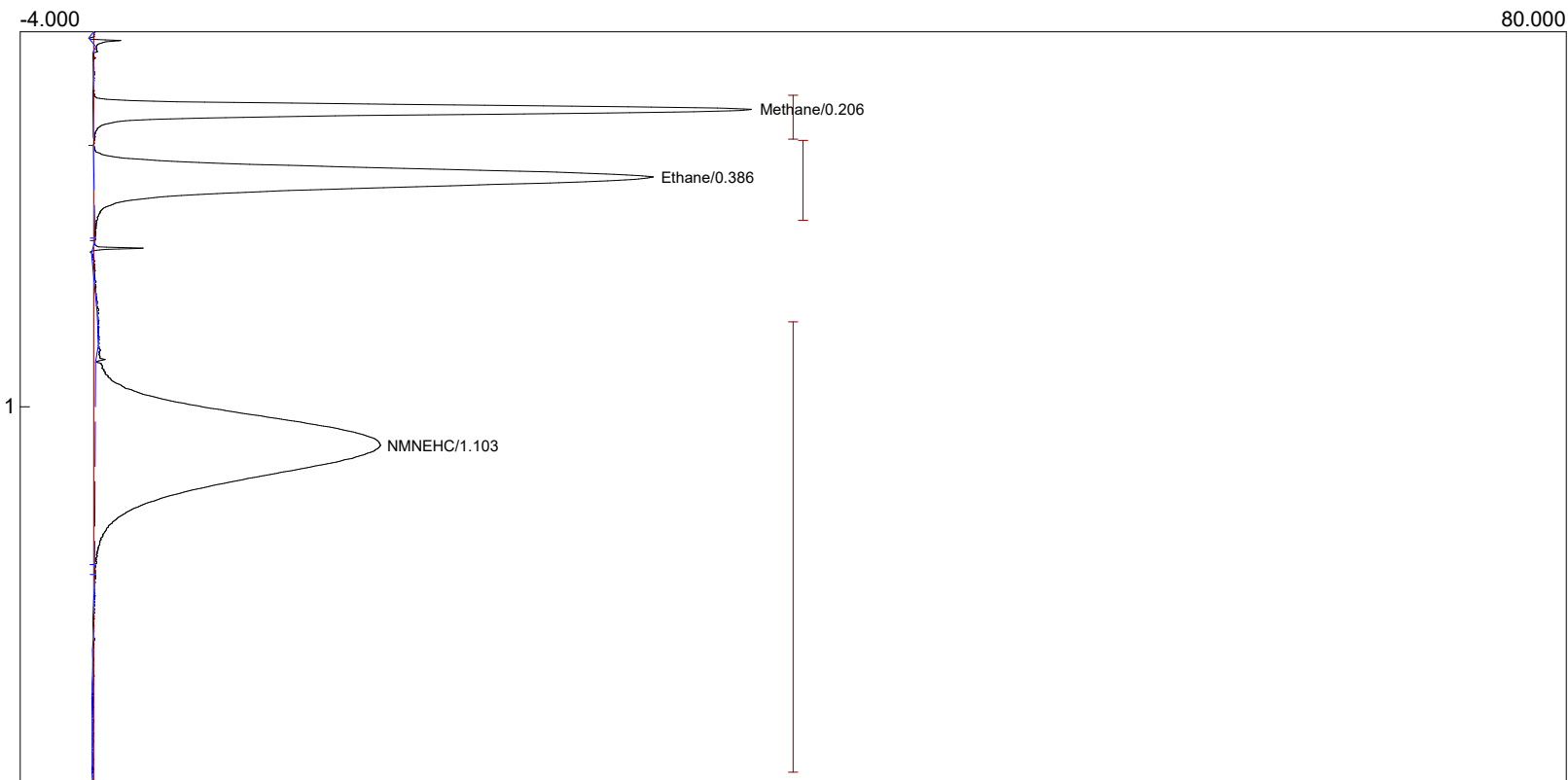
Component	Retention	Area
Methane	0.203	62.7031
Ethane	0.383	107.2032
NMNEHC	1.110	179.2038
		349.1101

Lab name: TRC Bakersfield
Client: Calibration
Analysis date: 12/30/2023 13:48:56
Description: FID-CHANNEL 1
Data file: Lab_1843_19.CHR ()
Sample: FCal 15 ppm Inj 2
Operator: J McSweeney, QI



Component	Retention	Area
Methane	0.203	62.8284
Ethane	0.380	106.9520
NMNEHC	1.113	179.2086
		348.9890

Lab name: TRC Bakersfield
Client: Calibration
Analysis date: 12/30/2023 13:51:35
Description: FID-CHANNEL 1
Data file: Lab_1843_20.CHR ()
Sample: FCal 15 ppm Inj 3
Operator: J McSweeney, QI



Component	Retention	Area
Methane	0.206	62.8820
Ethane	0.386	106.7544
NMNEHC	1.103	181.9892
		351.6256

VOC CALIBRATION GAS CERTIFICATES



Cylinder Number: EB0056927
Mixture Grade: Certified Mixture
Certificate Number:
Final Pressure: 2015 PSIG

Certification Date: 3/29/2022
Issuance Date: 3/29/2022
Expiration Date: 3/29/2030
Batch Number: 08422B-02T5
Part Number: T5C 7FB0001-A1-3

Do not use below 100 psi (0.7 megapascals)

Certified Concentrations

Component	Concentration	Analytical Uncertainty		Assay Dates
Methane	4.99 ppm	10 %	Relative	3/29/2022
Ethane	4.98 ppm	10 %	Relative	3/29/2022
Propane	4.91 ppm	10 %	Relative	3/29/2022
Nitrogen	Balance			

Analytical Instrumentation

Component	Analytical Principle	Make	Model	Serial	MPC Date
Methane	Gravimetric				
Ethane	Gravimetric				
Propane	Gravimetric				

Cylinder serial numbers in this batch: EB0056927

The calibration results published in this certificate were obtained using equipment and standards capable of producing results that are traceable to National Institute of Standards and Technology (NIST) and through NIST to the International System of Units (SI). The expanded uncertainties, if included on this certificate, use a coverage factor of $k=2$ to approximate the 95% confidence level of the measurement, unless otherwise noted. If uncertainties are not included on this certificate, they are available upon request. The nitrogen used as a component or balance gas as well as the oxygen used in air mixtures meets the requirements set forth in 40CFR1065.750. This calibration certificate applies only to the item described and shall not be reproduced other than in full, without written approval from the calibration facility. Calibration certificates without signatures are not valid. This calibration meets the requirements of ISO/IEC 17025-2017.

Christopher Haas
Analytical Chemist Christopher Haas
Allison Martinez
Quality Manager Allison Martinez

Production Laboratory:
Tier 5 Labs
PGVP Vendor ID R12022
5353 W Southern Ave
Indianapolis, IN 46241



Cylinder Number: CC455254
Mixture Grade: Certified Mixture
Certificate Number: 06823B-02T5-C02
Final Pressure: 2030 PSIG
Order Number: 7180624 002
Cylinder Volume: 140.8

Certification Date: 3/13/2023
Issuance Date: 3/13/2023
Expiration Date: 3/13/2031
Batch Number: 06823B-02T5
Part Number: T5C 7FB0001-A1-4
CGA Outlet Connection: 350

Do not use below 100 psi (0.7 megapascals)

Certified Concentrations

Component	Concentration	Analytical Uncertainty		Assay Dates
Methane	15.0 ppm	5 %	Relative	3/13/2023
Ethane	14.8 ppm	5 %	Relative	3/13/2023
Propane	14.8 ppm	5 %	Relative	3/13/2023
Nitrogen	Balance			

Analytical Instrumentation

Component	Analytical Principle	Make	Model	Serial	MPC Date
Methane	Gravimetric				
Ethane	Gravimetric				
Propane	Gravimetric				

Cylinder serial numbers in this batch: CC719540 CC455254

The calibration results published in this certificate were obtained using equipment and standards capable of producing results that are traceable to National Institute of Standards and Technology (NIST) and through NIST to the International System of Units (SI). The expanded uncertainties, if included on this certificate, use a coverage factor of $k=2$ to approximate the 95% confidence level of the measurement, unless otherwise noted. If uncertainties are not included on this certificate, they are available upon request. The nitrogen used as a component or balance gas as well as the oxygen used in air mixtures meets the requirements set forth in 40CFR1065.750. This calibration certificate applies only to the item described and shall not be reproduced other than in full, without written approval from the calibration facility. Calibration certificates without signatures are not valid. This calibration meets the requirements of ISO/IEC 17025-2017.

Carlie Peacock

Analytical Chemist

Alexis Gerke

Analytical Chemist

Production Laboratory:

Tier 5 Labs
PGVP Vendor ID R12023
5353 W Southern Ave
Indianapolis, IN 46241



Cylinder Number: CC730137
Mixture Grade: Certified Mixture
Certificate Number:
Final Pressure: 2015 PSIG

Certification Date: 3/29/2022
Issuance Date: 3/29/2022
Expiration Date: 3/29/2030
Batch Number: 08422B-02T5
Part Number: T5C 7FB0001-A1-5

Do not use below 100 psi (0.7 megapascals)

Certified Concentrations

Component	Concentration	Analytical Uncertainty		Assay Dates
Methane	50.1 ppm	5 %	Relative	3/29/2022
Ethane	49.1 ppm	5 %	Relative	3/29/2022
Propane	49.3 ppm	5 %	Relative	3/29/2022
Nitrogen	Balance			

Analytical Instrumentation

Component	Analytical Principle	Make	Model	Serial	MPC Date
Methane	Gravimetric				
Ethane	Gravimetric				
Propane	Gravimetric				

Cylinder serial numbers in this batch: CC730137

The calibration results published in this certificate were obtained using equipment and standards capable of producing results that are traceable to National Institute of Standards and Technology (NIST) and through NIST to the International System of Units (SI). The expanded uncertainties, if included on this certificate, use a coverage factor of $k=2$ to approximate the 95% confidence level of the measurement, unless otherwise noted. If uncertainties are not included on this certificate, they are available upon request. The nitrogen used as a component or balance gas as well as the oxygen used in air mixtures meets the requirements set forth in 40CFR1065.750. This calibration certificate applies only to the item described and shall not be reproduced other than in full, without written approval from the calibration facility. Calibration certificates without signatures are not valid. This calibration meets the requirements of ISO/IEC 17025-2017.

Analytical Chemist Christopher Haas

Quality Manager Allison Martinez

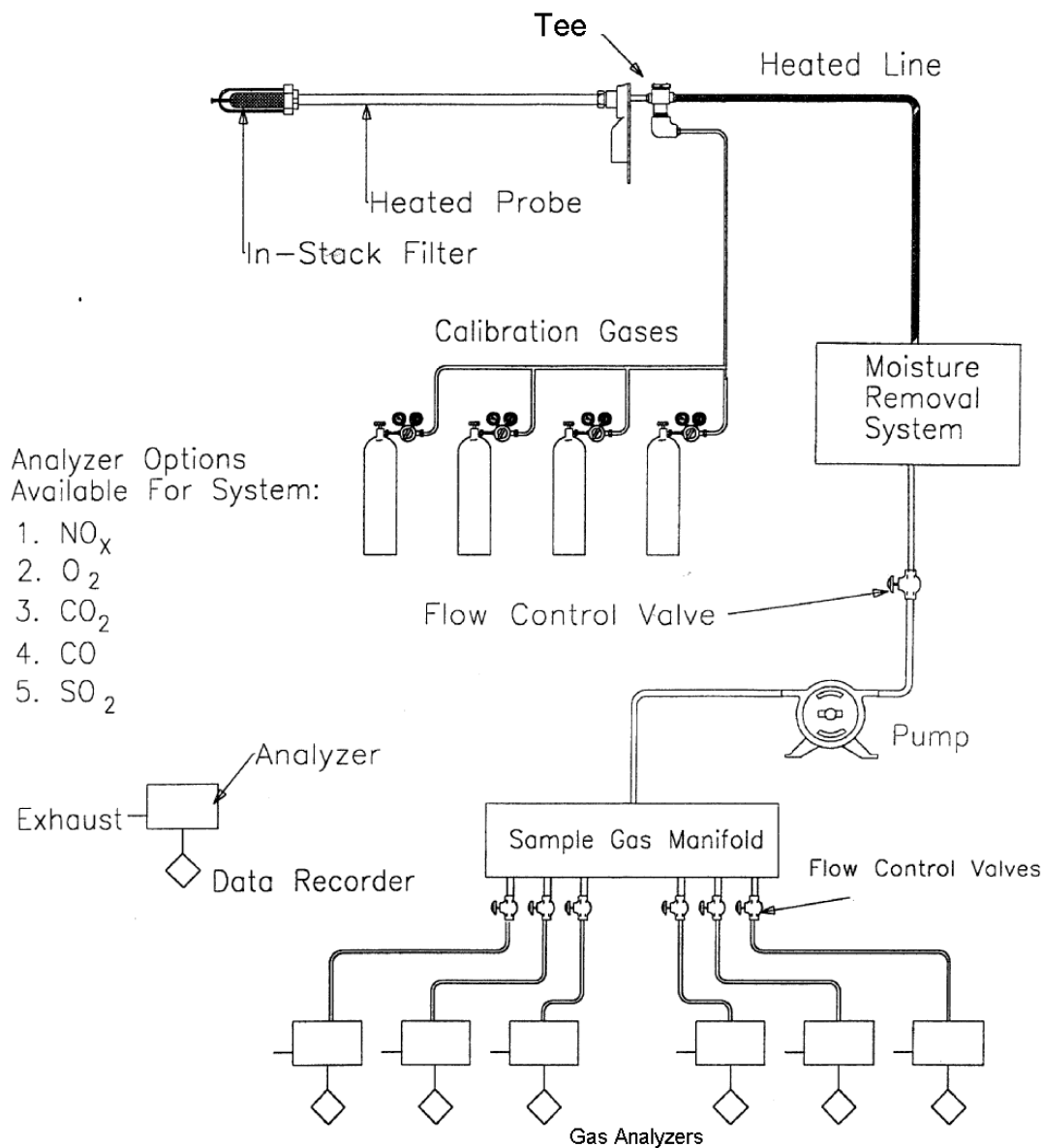
Production Laboratory:

Tier 5 Labs
PGVP Vendor ID R12022
5353 W Southern Ave
Indianapolis, IN 46241



Determination of Multiple Gaseous Pollutants Using an Extractive Sampling Train

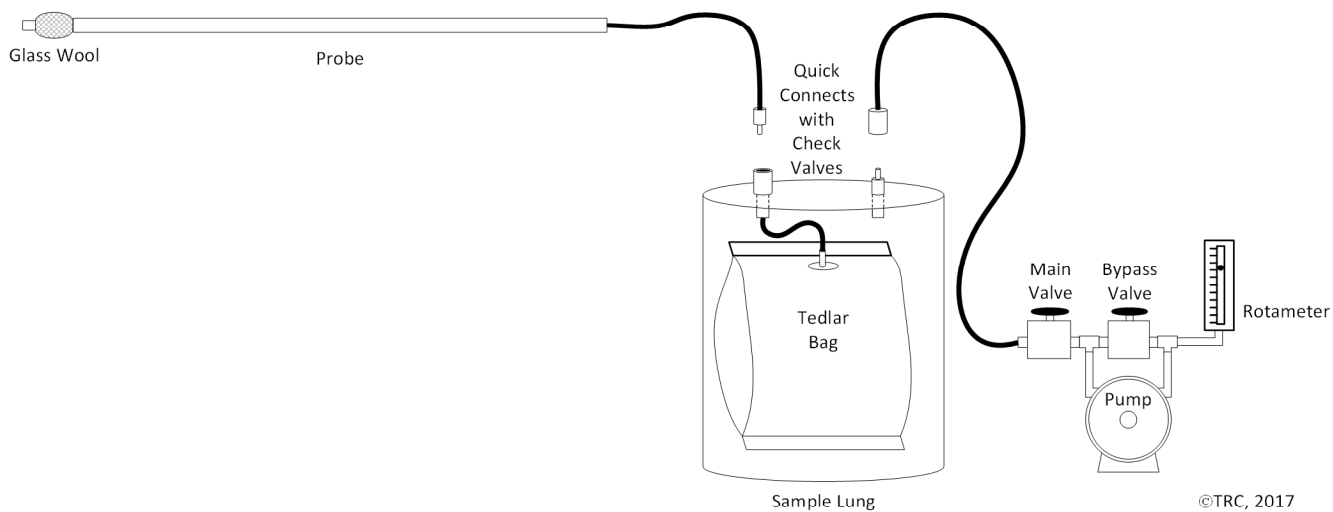
USEPA Promulgated Methods 3A, 6C, 7E and 10





Determination of Gaseous Organic Compounds by Gas Chromatography (Tedlar Bag Procedure)

USEPA Promulgated Method 18



Sivesind, Shawna

From: McSweeney, James
Sent: Tuesday, December 26, 2023 12:23 PM
To: Sivesind, Shawna
Subject: Fwd: [EXTERNAL] RE: Tulsa Heater (S-37-1-18) Source Testing questions

Fyi

Sent from my Verizon, Samsung Galaxy smartphone
Get [Outlook for Android](#)

From: Source Test South <Source.TestSouth@valleyair.org>
Sent: Tuesday, December 26, 2023 10:24:31 AM
To: Harris, Jeff <JHarris@trccompanies.com>; McSweeney, James <JMcSweeney@trccompanies.com>; 'Thomas Landeros' <tlanderos@kernenergy.com>; 'mpalmer@kernenergy.com' <mpalmer@kernenergy.com>; Gabe Castro <gcastro@kernenergy.com>
Subject: RE: [EXTERNAL] RE: Tulsa Heater (S-37-1-18) Source Testing questions

This is an **External** email. Do not click links or open attachments unless you validate the sender and know the content is safe.

ALWAYS hover over the link to preview the actual URL/site and confirm its legitimacy.

District Staff has completed the review of the test protocol submitted for the testing of permitted unit(s) S-37-1-18. Staff finds the protocol will meet the District's requirements. Should the test date or test methods change from the approved protocol, then a modified protocol shall be submitted for review no later than seven (7) days prior to the scheduled test date. Submittal of the modified protocol after this date may result in test cancellation by District Staff.

Source test reports may be submitted to the District electronically at Source.TestSouth@valleyair.org or via PAS Portal. Refer to the latest policy for requirements.

Sincerely,

*Dave Born
Supervising Air Quality Inspector
Office: (661) 392-5559
Fax: (661) 392-5585
Cell: (559) 260-7497*



From: Renee Chavez <Renee.Chavez@valleyair.org>
Sent: Friday, December 22, 2023 4:11 PM
To: Source Test South <Source.TestSouth@valleyair.org>
Subject: FW: [EXTERNAL] RE: Tulsa Heater (S-37-1-18) Source Testing questions