City of Vernon

LIGHT & POWER DEPARTMENT
Donal O'Callaghan, Director of Light & Power

December 19, 2007

Steve Munro
Compliance Project Manager
Systems Assessment & Facility Siting Division
California Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814

Subject: Malburg Generating Station (Docket 01-AFC-25C)
Petition to Modify the Malburg Generating Station Project Final Decision

Dear Mr. Munro:

Enclosed is City of Vernon's petition to amend the California Energy Commission's license for the Malburg Generating Station to include new cold startup emission rates. These new cold startup emission rates are consistent with emission measurements recorded by the facility's emission monitoring system and other similar combustion turbine projects licensed by the Commission. As proposed, the project modifications will not result in any significant environmental impacts. All applicable laws, ordinances, regulations, and standards will be compiled with and only one Condition of Certification (AQ-C10) needs to be modified for the new cold startup emissions. This proposed change in Condition AQ-C10 will not require modification of any South Coast Air Quality Management District conditions.

If you have any questions regarding this petition, please contact Dr. Krishna Nand at (323) 583-8811 ext. 211.

Sincerely,

Donal O'Callaghan
Director of Light & Power

Enclosures

4305 Santa Fe Avenue, Vernon, California 90058 Telephone (323) 583–8811 Fax (323) 826-1425

Exclusively Industrial

Final

City of Vernon
Malburg Generating Station
Proposed Amendment

Prepared for

California Energy Commission

December 2007

CH2MHILL
2485 Natomas Park Drive
Suite 600
Sacramento, CA 95833

Final

City of Vernon
Malburg Generating Station
Proposed Amendment

Submitted to

California Energy Commission

December 2007

CH2MHILL

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SECTION 1

Introduction

1.1 Background

On December 21, 2001, the City of Vernon (City) filed an Application for Certification (AFC) with the California Energy Commission (CEC) seeking approval to construct and operate the Malburg Generating Station (MGS), a 134-megawatt (MW) nominal combined-cycle electric generation facility. The CEC issued a final decision for the MGS on May 20, 2003. The City began construction activities in 2003, with commercial operations beginning in 2005. The information used to prepare the AFC, and relied on by the CEC, was based on the best available data, and included estimates by equipment manufacturers. In the case of air quality emission estimates, the City requested turbine operating, startup, and shutdown emissions estimates from Alstrom (the turbine vendor selected for the MGS). These emission estimates were used by the CEC to develop Conditions of Certification (COCs). COC AQ-C10 (of the CEC Decision) contains air emission limitations on an hourly, daily, and annual basis, including startup and shutdown periods. The hourly startup emission estimates used in COC AQ-C10 are for a cold startup (a startup where the turbines have not been in operation for an extended time). As the MGS facility operates almost daily, the number of cold startups that have occurred since commercial operations in October 2005 is nine per unit. After reviewing the continuous emissions monitoring data for these cold startup periods, the City determined that it was not able to comply with COC AQ-C10 on a continuous basis. Therefore, the City is requesting an amendment to COC AQ-C10.

1.2 Description of Proposed Amendment

The City is requesting to amend COC AQ-C10 of the CEC Decision by increasing the emission limits presented in the condition. No physical or operational changes to the MGS are proposed.

1.3 Summary of Environmental Impacts

Section 1769 (a)(1)(E) of the CEC Siting Regulations requires that an analysis be conducted that addresses impacts that the modification might have on the environment and proposed measures to mitigate any significant adverse impacts. In addition, Section 1769 (a)(1)(F) of the Siting Regulations requires a discussion of the impacts the modification might have on the project's ability to comply with applicable laws, ordinances, regulations, and standards (LORS).

The proposed change to COC AQ-C10 will allow increases in short-term oxides of nitrogen (NO_X) and carbon monoxide (CO) emission rates, but will not affect other pollutants. The proposed change would not impact other environmental issue areas (e.g., biological resources, cultural resources, land use, noise, soil and water, paleontological resources, and so forth). Short-term increases in NO_X or CO emissions are not expected to cause or contribute to the violation of either state or federal ambient air quality standards.

Section 2 of this Amendment provides a description of the Project Amendment. Section 3 includes a detailed analysis of the potential environmental impacts of the proposed design changes, as well as a discussion of the consistency of the modification with LORS. Section 3 concludes that there will be no significant environmental impacts associated with the Amendment, and that the project as amended will comply with applicable LORS. Proposed modifications to the conditions of certification are provided in Section 4.

As the startup emissions are not specifically addressed in the South Coast Air Quality Management District's conditions, the City is not proposing to modify any of these conditions.

1.4 Consistency of Amendment with License

Section 1769 (a)(1)(D) of the CEC Siting Regulations requires a discussion of the Amendment's consistency with LORS and whether the modifications are based on new information that changes or undermines the assumptions, rationale, findings, or other bases of the final decision. If the project is no longer consistent with the CEC license, an explanation of why the modification should be permitted must be provided. In the sections that follow, the City provides an explanation of the proposed modifications, rationale for the modifications, and a LORS compliance analysis. Proposed modifications to the existing COC AQ-C10 are included in Section 4.

SECTION 2

Description of Project Amendment

Consistent with CEC Siting Regulations, Sections 1769 (a)(1)(A) and 1769(a)(1)(B), this section includes a complete description of the project modifications, as well as the necessity for the amendment.

2.1 Revised Startup Emissions

During the preparation of compliance reports, the City identified a couple of instances where the NO_X and CO emission rates exceeded limitations contained in COC AQ-C10. After further research, it was determined that when the turbines started up after an extended shutdown, it resulted in air emissions that were greater than the emission estimates used in the preparation of the AFC. The City has explored control measures with the turbine vendors and has not identified any practical solution; therefore, it is requesting an increase in the maximum hourly and daily NO_X and CO emission limits contained in COC AQ-C10.

2.2 Necessity of Proposed Change

Sections 1769 (a)(1)(B) and 1769(a)(1)(C) of the CEC Siting Regulations require a discussion of the necessity for the proposed changes to the project and whether this modification is based on information that was known by the petitioner during the CEC licensing proceeding. During the licensing period, the City requested startup data from the turbine vendor. These data were used as the basis for project licensing and were considered the best available data at the time.

SECTION 3

Environmental Analysis of the Project Changes

This proposed Amendment, requesting to increase cold startup emissions for NO_X and CO, is only expected to impact air quality resources. No other resource areas would be impacted from the proposed change, and are therefore, not analyzed. This request will not require any changes to fuel or water usage. The following section presents the revised startup emissions, ambient air quality impact assessment, mitigation measures, cumulative impact assessment, and a discussion of LORS compliance.

3.1 Air Quality

This section reviews the potential air quality impacts associated with the proposed change to the startup NO_X and CO emissions. The following areas were reviewed:

- Operational Emissions Estimate
- Air Quality Impacts
- Mitigation Measures
- Cumulative Impacts
- Compliance with LORS
- Conclusions

3.1.1 Proposed Emissions

3.1.1.1 Operational Emissions

The proposed increase in startup NO_X and CO emissions will increase the hourly, daily, and annual emissions. Based on a review of MGS Continuous Emission Monitoring System (CEMS) data and other Alstrom turbines licensed by the CEC, revised emission estimates were prepared. Tables 3.1-1, 3.1-2, and 3.1-3 present a summary of the maximum NO_X and CO hourly, daily, monthly, and annual emissions, including startup and shutdown emissions. Emissions for other air pollutants are not impacted by the increase in startup emissions and are therefore not presented to avoid confusion. The emissions estimates presented in Tables 3.1-1, 3.1-2, and 3.1-3 show that there will be an increase in NO_X and CO emissions relative to the emissions licensed by the CEC.

It should be noted that the annual emissions increase in CO is above the permitted CO emission rate presented in COC AQ-5 of 7,633 pounds per month.[1] However, CO emissions cannot increase above the monthly permit limits contained in COC AQ-5.

[1] Assuming the project emits 7,633 lb CO/Month, the annual CO emissions would be 91,596 lb/year.

TABLE 3.1-1
Revised Hourly NO_X and CO Emissions, lb/hr

	Gas Turbines (2)	Cooling Tower	Firewater Pump	Facility Total	Notes
CO	179.0	0	0.59	179.6	a, b
NO_X	74.2	0	1.73	75.93	a, b

[a]Gas turbine emission data are from Roseville Energy Park Facility (AFC-03-AFC-1), Commission Decision, April 2005 (page 150).

[b]The firewater pump is being tested 0.5 hour.

TABLE 3.1-2
Revised Daily NO_X and CO Emissions, lb/day

	Gas Turbines (2)	Cooling Tower	Firewater Pump	Facility Total	Notes
CO	463.2	0	0.59	463.8	a, b
NO_X	322.6	0	1.73	324.4	a, b

[a]The gas turbines are undergoing one cold startup (2 hours) per day and 22 hours per day full load operation with duct firing.

[b]The firewater pump is being tested 0.5 hour/day.

TABLE 3.1-3
Revised Annual NO_X and CO Emissions, lb/year

	Gas Turbines (2)	Cooling Tower	Firewater Pump	Facility Total	Tons/yr	Notes
CO	169,053	0	235	169,288	84.6	a, b
NO_X	117,764	0	689	118,453	59.2	a, b

[a]Based on daily emission presented in Table 3.1-2 multiplied by 365 days per year.

[b]The firewater pump is being tested 199 hours/year.

3.1.2 Air Quality Impacts

Potential changes in air quality impacts have been evaluated for the operational phase of the project. In order to evaluate the change in the NO_X and CO ambient air quality impacts associated with the revised startup emission rates, the City used the scaling technique that uses the emissions and modeling impact data from the MGS (01-AFC-25) Final Staff Assessment (FSA) to predict revised ambient air quality impacts. FSA Air Quality Tables 9 through 12, and 16 were used to convert the ambient air quality impact results to a microgram per cubic meter per pound basis, which was then multiplied by the proposed NO_2 and CO emission rates to predict 1-hour NO_2 and CO impacts, 8-hour CO impacts, and annual NO_2 impacts.

The background ambient air quality data used in this analysis are presented in Table 3.1-4 and represent the highest NO_2 and CO ambient air quality data from the Lynnwood and North Main air quality monitoring stations.

TABLE 3.1-4
Background Air Concentrations for the Malburg Generating Station[a] 2004 – 2006

Pollutant	Averaging Time	2004		2005		2006		Maximum
		ppm	µg/m^3	ppm	µg/m^3	ppm	µg/m^3	µg/m^3
NO_2	1-hour	0.1	188	0.11	207	0.14	263	263
	Annual	0.0301	56.6	0.0312	58.7	0.0306	57.6	58.7
CO	1-hour	10	11,452	7	8,016	8	9,161	11,452
	8-hour	6.7	7,673	5.9	6,757	6.4	7,330	7,673

[a]Conversion from ppm to µg/m^3 at 25° Celsius and 760 torr.

Sources: SCAQMD, http://www.aqmd.gov/smog/historicaldata.htm

Table 3.1-5 presents a comparison of the ambient air quality impacts resulting from the proposed startup emission rates to the ambient air quality standards. The background concentrations shown in Table 3.1-5 are based on maximum data presented in Table 3.1-4. The emission rates used for the 1-hour impact assessment are from Table 3.1-1. The 8-hour CO emission rate used in this assessment included 2 hours of startup emissions, plus 6 hours of duct-firing CO emissions. The annual NO_X emissions used are from Table 3.1-3. Table 3.1-5 shows that the project, as proposed, does not result in significant air quality impacts and continues to comply with ambient air quality standards.

TABLE 3.1-5
Comparison of Malburg Generating Station's Revised Ambient Air Quality Impacts to Ambient Air Quality Standards

Pollutant	Averaging Time	Maximum Project Impact (µg/m^3)	Background Concentrations (µg/m^3)	Total Operational Impact (µg/m^3)	State Standard (µg/m^3)	Federal Standard (µg/m^3)	SCAQMD Significance Threshold (µg/m^3)
NO_2	1-hour	30.9	263	293.9	470	--	--
	Annual[a]	0.65	58.7	59.4	--	100	--
CO	1-hour	81.9	--	81.9	--	--	1,100
	8-hour[b]	2.1	7,673	7675	23,000	40,000	--

[a]Based on the annual NO_X emission presented in Table 3.1-3.

[b]Assumed 2 hours of cold start CO emissions (89.5 lb/hr * 2) plus 6 hours of full load duct-firing CO emissions (2.4 lb/hr).

3.1.3 Mitigation Measures

The City provided mitigation in the form of emission reduction credits (ERCs) for the operations of the MGS prior to the issuance of the license. The quantities of ERCs provided are reflected in COC AQ-5, on a monthly basis, and the City is not requesting a revision to COC AQ-5. Furthermore, any increase in NO_X emissions is required to be mitigated by

demonstrating that the City holds sufficient RTCs in an amount equal to the annual NO_X emissions, consistent with COC AQ-32. Therefore, no additional mitigation is necessary.

3.1.4 Cumulative Impacts

Because no new ambient impacts are anticipated as a result of the proposed changes to the project, no significant change to the original assessment of the cumulative air quality impacts are expected.

3.1.5 Compliance with LORS

The MGS is in compliance with all applicable LORS, with the exception of COC AQ-C10. With the CEC approval of the proposed changes to COC AQ-C10, the MGS will be in compliance with all applicable LORS.

3.1.6 Conclusions

With the proposed amendments to the cold startup emissions, the CEC staff's conclusions in the FSA and Final Decisions that air quality impacts from the project are less than significant, will still be applicable.

3.2 Public Health

The public health impacts assessed during the licensing of the MGS indicated that the acute, chronic, and cancer risks associated with the operation of the MGS project were significantly below the CEC's significant impact levels.[2] The proposed increase in air emissions is not expected to increase the operation of the turbines, nor are they expected to increase the amount of fuel fired (the basis for calculating the MGS non-criteria pollutant emissions that drive the health risk assessment). Therefore, no significant public health impacts are expected from the proposed changes to COC AQ-C10.

For the original project, the CEC determined that the MGS project would not have a significant direct or cumulative impact on public health.[3] As the proposed change to the MGS license is not expected to increase public health impacts above those analyzed during licensing, no significant cumulative public health impacts are expected.

3.2.1 Compliance with LORS

The proposed changes to the MGS project will be in compliance with all applicable LORS.

[2] MGS Final Staff Assessment, Public Health Table 2, page 4.7-13.

[3] MGS Final Staff Assessment, Public Health Section, page 4.7-14.

SECTION 4

Proposed Modifications to the Conditions of Certification

Consistent with the requirements of the CEC Siting Regulations Section 1769 (a)(1)(A), this section addresses the proposed modifications to the project's COC.

The proposed modifications to COC AQ-C10 is presented below with deletions in strike-out and insertions in underline.

AQ-C10 The City of Vernon shall commission and operate the Malburg Generation Station within the following emission limits.

Commissioning

During the first year of commissioning and operation, the following emission limits shall apply.

Annual Commissioning Emission Limits

Units are in pounds per year

	Gas Turbines (2)	Cooling Tower	Firewater Pump	Facility Total	Assumptions
CO	112,743	0	478	113,221	a,b,c
NO_x	229,531	0	1,377	230,908	a,b,c
PM10	48,873	2,190	58	51,121	a,b,c
ROG	40,518	0	35	40,553	a,b,c
SO_x	4,294	0	2	4,296	a,b,c
Ammonia	49,514	0	0	49,514	a,b,c

Assumptions

a The gas turbines are undergoing initial commissioning for three months (2,160 hours) then 3 cold startups, 39 warm startups, 42 shutdowns and 4,355 hours at full load with the duct burners on @ 65 deg F.

b The cooling tower at full load for 8760 hours/year,

c The Firewater pump is being tested 199 hours/year.

Post Commissioning

After the end of the commissioning period, the following hourly and daily emission limits shall apply. The following annual emission limits shall only apply until after the first calendar year of operation is complete.

Hourly Emission Limits

Units are in pounds per hour

	Gas Turbines (2)	Cooling Tower	Firewater Pump	Facility Total	Assumptions
CO	~~48.6~~179.0	0	0.59	~~49.19~~179.6	a,c,d
NO_X	~~26.2~~74.2	0	1.73	~~27.93~~75.9	a,c,d
PM10	7.78	0.26	0.08	8.12	b,c,d
VOC	3.3	0	0.05	3.35	a,c,d
SOx	0.3	0	0.002	0.30	b,c,d
Ammonia	7.6	0	0.00	7.60	b,c,d

Assumptions

a The gas turbines are undergoing a cold startup ~~@ 38 deg F~~.

b The gas turbines are at full load @ 38 deg F with the duct burners on.

c The cooling tower is at full load,

d The Firewater pump is being tested for 1/2 hour.

Daily Emission Limits

Units are in pounds per day

	Gas Turbines (2)	Cooling Tower	Firewater Pump	Facility Total	Assumptions
CO	~~104.00~~463.2	0	0.59	~~104.59~~463.8	a,d,e,
NO_x	~~175.00~~322.6	0	1.73	~~176.73~~324.4	a,d,e,
PM10	158.00	6.20	0.08	164.28	a,d,e
VOC	36.00	0	0.05	36.05	a,d,e
SO_x	6.00	0	0.002	6.00	a,d,e
Ammonia	182.4	0	0.00	182.40	a,d,e

Assumptions

a The gas turbines are undergoing 1 ~~warm~~cold startup (~~1.5~~2 hours) per ~~month, 8 hours/~~day and 22 hours of full load operation with duct firing~~, 16 hours/day full load without duct firing and 0.5 hours shutdown per month~~ @ 65 deg F~~ averaged for 2931 days/month,~~.

b The gas turbines are at full load for 24 hours @ 38 deg F with the duct burners on.

c The gas turbines are undergoing cold startup (2 hours) and baseload operation for 22 hours-@ 38 deg F.

d The cooling tower is at full load for 24 hours/day

e The Firewater pump is being tested 0.5 hours/day

Annual Emission Limits

Units are in pounds per year

	Gas Turbines (2)	Cooling Tower	Firewater Pump	Facility Total		Assumptions
				Lbs/yr	Tons/yr	
CO	~~37,145~~169,053	0	235	~~37,380~~169,288	~~18.66~~84.6	a,c,d
NO_x	~~52,674~~117,764	0	689	~~53,363~~118,453	~~26.68~~59.2	a,c,d
PM10	56,676	2,278	32	58,986	29.49	b,c,d
VOC	13,027	0	20	13,047	6.52	b,c,d
SO_x	2,122	0	1	2,123	1.06	b,c,d
Ammonia	66,576	0	0	66,576	3.29	b,c,d

Assumptions

a ~~t~~The gas turbines are undergoing one ~~warm~~cold startup per ~~month~~day (~~1.5~~2 hours), 22 hours/day of full load operation with the duct burner~~, 16 hours/day of full load operation without the duct burners and one shutdown per month (0.5 hours)~~ @ 65 deg F for 365 days per year.

b The gas turbines are undergoing 4 cold starts (2 hours), 52 warm starts (1.5 hours) 1314 hours of full load operation with the duct burner, 5782 hours of full load operation without the duct burner and 56 shutdowns (0.5 hours) per year~~,~~.

c The cooling tower at full load for 8760 hours/day~~,~~.

d The Firewater pump is being tested 199 hours/day.

Verification: The City of Vernon shall submit to the CPM for approval on a quarterly basis all emission records and calculations to demonstrate compliance with the emission limits stated herein as part of the quarterly emissions report.

SECTION 5

Potential Effects on the Public

Consistent with the requirements of the CEC Siting Regulations Section 1769 (a)(1)(G), this section addresses the proposed Amendment's effects on the public.

The proposed amendment is not expected to have impacts that are greater than those analyzed during project licensing. Therefore, impacts to the public are expected to be the same as those analyzed during CEC license proceeding for the MGS.

SECTION 6

List of Property Owners

Consistent with the CEC Siting Regulations Section 1769(a)(1)(H), this section lists the property owners affected by the proposed modifications. The list of property owners are presented in Appendix A.

SECTION 7

Potential Effects on Property Owners

Consistent with the CEC Siting Regulations Section 1769(a)(1)(I), this section addresses potential effects of the proposed Amendment on nearby property owners, the public, and parties in the application proceeding.

The proposed project change is expected to result in comparable impacts as those analyzed during the licensing proceeding. Therefore, impacts to property owners are expected to be the same as those analyzed during the license proceeding for the project.

APPENDIX A

List of Property Owners within 1,000 Feet of the Project Site

	PARCEL	OWNERFIRST	OWNERLAST	MAILNUMBER	MAILSTREET	MAILCITY	MAILSTATE	MAILZIP
1	6308 002 900	Vernon City		4305	S Santa Fe Ave	Vernon	CA	90058
2	6303 014 016	Alsuda Enterprises			Po Box 49051	Los Angeles	CA	90049
3	6303 021 014	Leonis Investments Llc		300	E Esplanade Dr #2100	Oxnard	CA	93036
4	6303 022 001	46th Street Investors		2140	Rockwood Dr	Sacramento	CA	95864
5	6303 022 002	Mohammad	Hanifusman	2850	E 46th St	Vernon	CA	90058
6	6303 022 003	Leonis C & D Leonie	Malburg	2833	Leonis Blvd #111	Vernon	CA	90058
7	6303 022 004	Leonis & Dominica	Malburg	2833	Leonis Blvd #111	Vernon	CA	90058
8	6303 022 005	Bradmore Investment Co Ltd		721	Santa Monica Blvd	Santa Monica	CA	90401
9	6303 022 006	Steve	Joo	2909	Leonis Blvd	Vernon	CA	90058
10	6303 022 007	B & K First Llc		17708	Heron Ln	Canyon Country	CA	91387
11	6303 022 009	Vernon Developers		1201	S Olive St	Los Angeles	CA	90015
12	6303 022 800	Casino Realty Inc		524	Chapala St	Santa Barbara	CA	93101
13	6303 023 002	Mz Investments Llc		2820	Leonis Blvd	Vernon	CA	90058
14	6303 023 003	Malburg 2001 Trust		2833	Leonis Blvd #111	Vernon	CA	90058
15	6303 023 004	Fleischman Trust & Fleischman Art	Arthur	2767	Butter Creek Dr	Pasadena	CA	91107
16	6303 023 005	Samuel & Marie D	Givertz	5256	Armida Dr	Woodland Hills	CA	91364
17	6303 023 006	Richard Brewer Trust		73091	Country Club Dr #a42	Palm Desert	CA	92260
18	6303 023 007	Leonis & Dominica	Malburg	2833	Leonis Blvd	Vernon	CA	90058
19	6303 023 008	Gamm Enterprises L P		16902	Coral Cay Ln	Huntington Park	CA	92649
20	6303 023 009	Joy Max Trading Inc		1120 1/2	S Main St	Los Angeles	CA	90015
21	6303 023 010	Joy Max Trading Inc		1120 1/2	S Main St	Los Angeles	CA	90015
22	6303 023 011	Leonis & Dominica	Malburg	2833	Leonis Blvd	Vernon	CA	90058
23	6303 024 008	Randall Foods Inc			Po Box 2669	Huntington Park	CA	90255
24	6303 024 009	Nieves Family L P		545	N Pennsylvania Ave	Glendora	CA	91741
25	6303 024 010	Randall Foods Inc			Po Box 2669	Huntington Park	CA	90255
26	6303 024 011	Randall Foods Inc			Po Box 2669	Huntington Park	CA	90255
27	6303 024 012	Nieves Family L P		545	N Pennsylvania Ave	Glendora	CA	91741
28	6303 024 016	Nadrem Assoc		2928	Leonis Blvd	Vernon	CA	90058
29	6303 024 017	Joseph & Jill	Poliner	336	9th St	Manhattan Beach	CA	90266
30	6303 024 018	L Ferrell Trust & Ferrell Willia	William	2906	Leonis Blvd	Los Angeles	CA	90058
31	6303 029 015	The City Of Vernon		4305	S Santa Fe Ave	Vernon	CA	90058
32	6303 029 016	Owens Brockway Glass Container Inc		1	Seagate	Toledo	OH	43666
33	6303 029 017	Owens Brockway Glass Container Inc		1	Seagate	Toledo	OH	43666
34	6303 029 900	Vernon City		4305	S Santa Fe Ave	Vernon	CA	90058
35	6308 001 022	George	Van Fossan	80	Plaza Cuesta	San Juan Capistrano	CA	92675
36	6308 001 023	Lee	Barab	4535	S Soto St	Vernon	CA	90058
37	6308 001 024	Grossman Family		2727	E 46th St	Vernon	CA	90058
38	6308 001 034	Hun Ya	Kao	385	S Lemon Ave #e158	Walnut	CA	91789
39	6308 002 006	2761 Fruitland Avenue Llc		2761	Fruitland Ave	Vernon	CA	90058
40	6308 002 007	2761 Fruitland Avenue Llc		2761	Fruitland Ave	Vernon	CA	90058
41	6308 002 009	Ramin & Betty	Youabian	4825	S Soto St	Vernon	CA	90058
42	6308 002 010	Oliver E	Clark	2716	Leonis Blvd	Vernon	CA	90058

43	6308 002 011	Oliver E	Clark	2716	Leonis Blvd	Los Angeles	CA	90058
44	6308 002 012	Stanley & Jennifer	Kim	345	Corona Dr	La Canada	CA	91011
45	6308 002 013	OE Clark Paper Box Co		2716	Leonis Blvd	Vernon	CA	90058
46	6308 002 014	Anne	Scott	10104	Empyrean Way #204	Los Angeles	CA	90067
47	6308 002 015	Anne	Scott	10104	Empyrean Way #204	Los Angeles	CA	90067
48	6308 002 016	Clark	Oliver	2716	Leonis Blvd	Vernon	CA	90058
49	6308 002 017	Clark	Oliver	2716	Leonis Blvd	Vernon	CA	90058
50	6308 002 018	Pasha & Associates Llc		14622	Ventura Blvd #763	Sherman Oaks	CA	91403
51	6308 002 019	Mardochee & Lubov	Azria	2761	Fruitland Ave	Vernon	CA	90058
52	6308 002 020	Mardochee & Lubov	Azria	2761	Fruitland Ave	Vernon	CA	90058
53	6308 002 902	Vernon City		4305	S Santa Fe Ave	Vernon	CA	90058
54	6308 003 009	First Streamline Management Llc		2670	Leonis Blvd	Vernon	CA	90058
55	6308 003 010	First Streamline Management Llc		2670	Leonis Blvd	Vernon	CA	90058
56	6308 003 012	Angelus Sanitary Can Machine Co		4900	Pacific Blvd	Vernon	CA	90058
57	6308 003 014	Mci Investment Group Inc		2615	Fruitland Ave	Vernon	CA	90058
58	6308 003 019	Ed	Elsner	4900	Pacific Blvd	Vernon	CA	90058
59	6308 003 020	Elsner Ed Tr R & E Family Trust		1708	Milan Ave	South Pasadena	CA	91030
60	6308 003 021	Angelus Sanitary Can Machine Co		4900	Pacific Blvd	Vernon	CA	90058
61	6308 003 022	Angelus Sanitary Can Machine Co		4900	Pacific Blvd	Los Angeles	CA	90058
62	6308 003 023	Stephane	Vachon	5050	Pacific Blvd	Vernon	CA	90058
63	6308 003 024	Mci Investment Group Inc		2615	Fruitland Ave	Vernon	CA	90058
64	6308 003 807	Ai & Sf Ry Co Sb Of E Par 59 Map 804-19-		4901	Seville Ave	Los Angeles	CA	90058
65	6308 004 006	Victor Bruno / Lee & Patricia	New	2639	Leonis Blvd	Vernon	CA	90058
66	6308 004 007	Victor Bruno / Lee & Patricia	New	2639	Leonis Blvd	Vernon	CA	90058
67	6308 004 008	Victor	Bruno	2639	Leonis Blvd	Los Angeles	CA	90058
68	6308 004 009	Suresh K & Anita	Nandwani	4632	Pacific Blvd	Vernon	CA	90058
69	6308 004 010	Young S	Chang	343	Pioneer Dr #1605	Glendale	CA	91203
70	6308 004 011	Jeremy J & Noble Donna	Jones	10412	Greenbrier Rd	Santa Ana	CA	92705
71	6308 004 012	Jose L & Lidia O	Guerra	8006	Danvers St	Downey	CA	90240
72	6308 004 013	2665 Leonis Boulevard Llc		2761	Fruitland Ave	Vernon	CA	90058
73	6308 005 007	Florman Family L P		4580	Pacific Blvd	Vernon	CA	90058
74	6308 005 009	Leo Hollander Trust	Leo	6560	W Rogers Cir #19	Boca Raton	FL	33487
75	6308 009 024	George W	Elftman	2825	Canterbury Rd	San Marino	CA	91108
76	6308 009 025	Marilyn S	Erlich	2413	Century Hl	Los Angeles	CA	90067
77	6308 009 027	Shlomo	Khoresh	4641	Pacific Blvd	Vernon	CA	90058
78	6308 009 028	Seymour & Shirley	Lehrer	975	Knollwood Dr	Santa Barbara	CA	93108
79	6308 009 029	Chandler Stephen Co		1592	Virginia Rd	San Marino	CA	91108
80	6308 010 016	Fe & J Inc		5075	Pacific Blvd	Vernon	CA	90058
81	6308 010 017	Fe & J Inc		5075	Pacific Blvd	Vernon	CA	90058
82	6308 010 018	Fe & J Inc		5075	Pacific Blvd	Vernon	CA	90058
83	6308 010 019	Nor Center Llc		2169	Haven Dr	Glendale	CA	91208
84	6308 010 020	Ruy A	Gomez	319	W 47th St	Los Angeles	CA	90037
85	6308 010 021	Huas Investment Group Llc		424	S San Pedro St	Los Angeles	CA	90013

86	6308 010 022	Henry H	Gilmore		Po Box 58041	Vernon	CA	90058
87	6308 010 023	Pi Yu & Shren C	Lin & Ou	4903	Pacific Blvd	Vernon	CA	90058
88	6309 018 003	5140 Pacific Blvd Llc		16109	Dickens St	Encino	CA	91436
89	6309 018 004	Geneva M	Efurd	40177	Corte Peralta	Murrieta	CA	92562
90	6309 018 005	Geneva M	Efurd	40177	Corte Peralta	Murrieta	CA	92562
91	6309 018 006	Kokis Enterprises Llc		1036	S Ynez Ave	Monterey Park	CA	91754
92	6309 018 007	Kokis Enterprises Llc		1036	S Ynez Ave	Monterey Park	CA	91754
93	6309 018 009	5140 Pacific Blvd Llc		16109	Dickens St	Encino	CA	91436
94	6309 019 002	Aircraft X Ray Laboratories Inc		5216	Pacific Blvd	Huntington Park	CA	90255
95	6309 026 012	51st Street Partnership		2700	Fruitland Ave	Vernon	CA	90058
96	6309 026 028	David Um & Un No	Young	2726	Fruitland Ave	Vernon	CA	90058
97	6309 026 033	Soto Industrial Center		5657	E Washington Blvd	Los Angeles	CA	90040
98	6309 026 034	Soto Industrial Center		5657	E Washington Blvd	Los Angeles	CA	90040
99	6309 026 035	David Um & Un No	Young	2726	Fruitland Ave	Vernon	CA	90058
100	6309 026 036	51st Street Partnership		2700	Fruitland Ave	Vernon	CA	90058
101	6310 009 014	Owens Illinois Glass Container Inc		1	Seagate #50sg	Toledo	OH	43666
102	6310 009 015	Owens Illinois Glass Container Inc		1	Seagate #50sg	Toledo	OH	43666