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Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM

Cover Sheet

Form TVPF45/07-21-03 Page 1 of 2

Instructions

This compliance certification cover sheet signed by the responsible official, Form TVPF45, must be submitted annually, on the anniversary date of the Part 70 permit; or on a more frequent schedule, if required by an applicable requirement or permit condition. To complete the compliance certification, you will need to attach the following to this sheet:

1. A completed compliance certification permit form (Form TVPF46) for each applicable requirement or Part 70 permit condition. Be sure to attach to the form any information specifically required to be submitted with the compliance certification by the applicable requirement or Part 70 permit condition. On this form, indicate the method(s) for determining compliance; if you are currently in compliance, as determined by the most recent monitoring measurement or observation; and whether the method(s) used for determining compliance indicate continuous or intermittent compliance during the period of certification. *Continuous* compliance should be checked if the source is in compliance as determined by all monitoring measurements required by the permit during the certification period. *Intermittent* compliance should be checked if any of these monitoring measurements, or any other information or data, indicates a failure to meet a term or condition of the permit, including a failure to monitor, report, or collect data as required by the permit. For example, if the permit requires an annual source test to demonstrate compliance and that annual source test indicates compliance, and no pre-test or other information indicated noncompliance during the period, compliance is considered to be *continuous* for the reporting period. If the answer to Question No. 4, 5 or 6 is "Yes" on compliance certification permit form TVPF46, compliance cannot be considered *continuous* without some further explanation or documentation.

In addition, for the time period covered by the certification, please identify any excursions or exceedances as indicated by the monitoring data. Also identify any information or data beyond the required monitoring that indicates that you are not in compliance. Note that you may cross reference any previous reports regarding compliance status that have previously been submitted to the District.

2. For each applicable requirement or Part 70 permit condition that requires compliance with a quantifiable emission rate, attach a completed quantifiable applicable requirement or Part 70 permit condition form (TVPF47) to Form TVPF46 for all emission units subject to the requirement or condition. On this form, please indicate the emission units subject to the requirement or condition; the pollutant regulated by the requirement or condition; the most recent measured emission rate, and the limited emission rate, both in units consistent with the requirement or condition; and a specific source test or monitoring record citation including the test date.

In lieu of filling out Forms TVPF46 and/or TVPF47, you may supply all of the necessary information required on the attached forms in your own format, and attach this information to Form TVPF45.

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM

Cover Sheet

Form TVPF45/07-21-03 Page 2 of 2

A copy of each compliance certification shall be submitted to EPA Region IX at the following address:

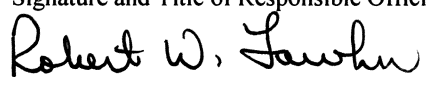
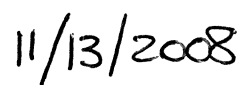
Mr. Gerardo Rios, Chief
Permits Office (AIR-3)
Office of Air Division
EPA Region IX
75 Hawthorne Street
San Francisco, CA 94105

Confidentiality

All information in a Part 70 permit compliance certification is public information. The Part 70 permit is also public information.

Certification by Responsible Official

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this compliance certification are true, accurate, and complete.

Signature and Title of Responsible Official:  Title: Environmental Director	Date: 
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Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
 Quantifiable Applicable Requirement or Part 70 Permit Condition Attachment
 Form TVPF47/12-21-98

Emission Unit Description: Mandalay Unit 1		Pollutant: NOx
Measured Emission Rate: 0.057 lb/NMWH	Limited Emission Rate: 0.10 lb/NMWH □ 0.02 lb/MMBTU	Specific Source Test or Monitoring Record Citation: CEMs data Test Date: 08/04/08

Emission Unit Description: Mandalay Unit 2		Pollutant: NOx
Measured Emission Rate: 0.010 lb/NMWH	Limited Emission Rate: 0.10 lb/NMWH □ 0.02 lb/MMBTU	Specific Source Test or Monitoring Record Citation: CEMs data Test Date: 08/04/08

Emission Unit Description: Mandalay Unit 1		Pollutant: NH3
Measured Emission Rate: 2.8 ppm	Limited Emission Rate: 10 ppm	Specific Source Test or Monitoring Record Citation: NH3 Slip Test Test Date: 07/08/08

Emission Unit Description: Mandalay Unit 2		Pollutant: NH3
Measured Emission Rate: 1.2 ppm	Limited Emission Rate: 10 ppm	Specific Source Test or Monitoring Record Citation: NH3 Slip Test Test Date: 07/23/08

Emission Unit Description: Unit 3 Peaking Turbine		Pollutant:
Measured Emission Rate: 57.5 hours/yr	Limited Emission Rate: 200 hours/yr	Specific Source Test or Monitoring Record Citation: Hourly Logs Test Date: Oct 2007 - Sep 2008

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Attachment 59N2 Cond #1	Description: NOx Emission Limit
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

CEMs Records and Emission Calculations

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 2 of 2

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

Condition 1a – Certified CEMS data demonstrates that there have been no exceedances of the 0.10 lbs/mw-hr limit. Data is submitted to the District and reviewed by the District on a periodic basis.

Condition 1b – Reliant Energy is prohibited from burning fuel oil in these units. None was burned during the compliance certification time period.

Condition 1c – Reliant Energy is prohibited from burning mixed fuel oil/natural gas in these units. None was burned during the compliance certification time period.

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Attachment 59N2 Cond #2	Description: Oil Burned During Force Majeure
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Fuel Usage Logs

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
- Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 2 of 2

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

Mandalay Generating Station is only permitted to burn natural gas in its boilers.

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Attachment 59N2 Cond #3	Description: NH3 Emissions
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Source Testing Reports

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if compliance during the reporting period was continuous or intermittent:

- Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition

4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 2 of 2

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

The Annual Ammonia Slip Tests for Units 1 and 2 were conducted on July 8, 2008 and June 23, 2008, respectively. Unit 1 tested at 2.8 ppm. Unit 2 tested at 1.2 ppm. See the attached information for verification.

**TABLE 1-1
AMMONIA SLIP TEST RESULTS
MANDALAY GENERATING STATION UNIT 1
JULY 8, 2008**

Parameter	Units	Test #1	Results Test #2	Test #3	Average
Load	nMW	194	202	202	199
O ₂	%	5.49	5.31	5.26	5.35
NH ₃	ppm	2.2	2.4	2.7	2.4
NH ₃	ppm @ 3% O ₂	2.6	2.7	3.0	2.8
NH ₃	lb/hr	2.3	2.5	2.8	2.6
NH ₃	lb/MMBtu	0.0012	0.0012	0.0014	0.0012
NH ₃	lb/MMSCF	1.21	1.29	1.43	1.31

**TABLE 1-1
AMMONIA SLIP TEST RESULTS
MANDALAY GENERATING STATION UNIT 2
JUNE 23, 2008**

Parameter	Units	Test #1	Results Test #2	Test #3	Average
Load	nMW	122	105	103	110
O ₂	%	6.81	7.16	7.18	7.05
NH ₃	ppm	1.2	0.8	0.9	1.0
NH ₃	ppm @ 3% O ₂	1.5	1.0	1.2	1.2
NH ₃	lb/hr	0.9	0.5	0.6	0.7
NH ₃	lb/MMBtu	0.001	0.000	0.001	0.001
NH ₃	lb/MMSCF	0.7	0.5	0.6	0.6

Ventura County Air Pollution Control District
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Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Attachment 59N2 Cond #4	Description: Cold Start-up, NO_x, NH₃ Emission Limits
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

CEMs Records and Operator Logs

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

There have been 60 Unit 1 start-ups during the compliance period. There have been 95 Unit 2 start-ups during the compliance period. These two units are subject to a 10 hour NOx and NH3 emission exemption period during start-up.

Plant records indicate that none of the unit start-ups have lasted more than 10 hours; nor have any excess NOx emissions lasted more than 10 hours during the unit start-ups. In addition, the District reviews all NOx emission records on a monthly basis.

NH3 emissions are tested on an annual basis.

Mandalay Generating Station

Unit name	Year	Month	number of Starts	powergads	cems
Man1	2007	10	5	5	5
Man1	2007	11	1	1	1
Man1	2007	12	3	3	3
Man1	2008	01	2	2	2
Man1	2008	02	0	0	1
Man1	2008	03	1	1	0
Man1	2008	04	0	0	0
Man1	2008	05	5	5	5
Man1	2008	06	11	11	11
Man1	2008	07	11	11	11
Man1	2008	08	20	20	20
Man1	2008	09	15	15	15

74 74 74

Unit name	Year	Month	number of Starts	powergads	cems
Man2	2007	10	9	9	9
Man2	2007	11	2	2	2
Man2	2007	12	6	7	6
Man2	2008	01	7	7	7
Man2	2008	02	4	4	5
Man2	2008	03	4	4	3
Man2	2008	04	7	7	7
Man2	2008	05	5	5	5
Man2	2008	06	16	16	16
Man2	2008	07	15	15	15
Man2	2008	08	27	27	27
Man2	2008	09	17	17	17

one double start

119 120 119

note: gas flow started in february 28th, but on line time started march 1st

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Attachment 59N2 Cond #5	Description: NOx lbs/MW-Hr
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

CEMs Records and Emission Calculations

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 2 of 2

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

Condition 5a - CEMs are used to monitor the NO_x emission rate.

Condition 5b - The megawatt metering calibration test occurs annually.

Condition 5c - The hourly lb/MW-hr NO_x is measured according to the procedures in 40 CFR 75.10(d)(1).

Condition 5d - The documents are retained at the plant and are available for District review.



NOx MW TEST DATA

PHANTOM LOAD TEST

SINGLE PHASE X
 THREE PHASE

LOCATION MANDALAY GEN. STA. GENERATOR: UNIT #1 GROSS CHARGES 7693-9657

TRANSDUCER: SCI. COL. MODEL: XL31K5PAN7-SC SERIAL NO.: NONE

AMPS: 5 WATTS: 1250 VOLTS: 120 NOMINAL OUTPUT: 4to20 mA

ELEMENT: 2 WIRE: 3 PT RATIO: 120 CT RATIO: 1600 MULT.: 192000

DISPLAY: Scientific Columbus MODEL: 6620 SERIAL NO.: 21228

STD. MODEL NO.: RD-21-352 SER. NO.: 201017 CALIB. DATE: 07/03/07 DUE DATE: 07/03/08

STD. ELEMENTS: 1

AS LEFT

VOLTS	AMPS	PF	NOM. MW	STANDARD			NOx MW	NOx IND. % ERROR	STD. % ERROR	TRUE NOx % ERROR
				TAP	WATTS	MW				
120.0	4.670	1.0	215	Auto	560.87		215.44			
120.0	4.670	1.0	215	Auto	560.85		215.46			
120.0	4.670	1.0	215	Auto	560.85		215.48			
120.0	4.670	1.0	215	Auto	560.84		215.48			
120.0	4.670	1.0	215	Auto	560.84		215.49			
AVERAGE					560.85	215.366	215.47	0.05	0.00	0.05
120.0	3.910	1.0	180	Auto	469.72		180.53			
120.0	3.910	1.0	180	Auto	469.74		180.51			
120.0	3.910	1.0	180	Auto	469.74		180.51			
120.0	3.910	1.0	180	Auto	469.56		180.44			
120.0	3.910	1.0	180	Auto	469.56		180.44			
AVERAGE					469.65	180.346	180.49	0.08	0.00	0.08
120.0	3.260	1.0	150	Auto	391.23		150.35			
120.0	3.260	1.0	150	Auto	391.24		150.34			
120.0	3.260	1.0	150	Auto	391.23		150.35			
120.0	3.260	1.0	150	Auto	391.23		150.35			
120.0	3.260	1.0	150	Auto	391.24		150.35			
AVERAGE					391.23	150.234	150.35	0.08	0.00	0.08
120.0	2.170	1.0	100	Auto	260.38		100.07			
120.0	2.170	1.0	100	Auto	260.38		100.07			
120.0	2.170	1.0	100	Auto	260.38		100.07			
120.0	2.170	1.0	100	Auto	260.38		100.07			
120.0	2.170	1.0	100	Auto	260.38		100.09			
AVERAGE					260.38	99.986	100.07	0.09	0.00	0.09
120.0	1.635	1.0	75	Auto	196.32		75.44			
120.0	1.635	1.0	75	Auto	196.31		75.44			
120.0	1.635	1.0	75	Auto	196.32		75.44			
120.0	1.635	1.0	75	Auto	196.39		75.47			
120.0	1.635	1.0	75	Auto	196.24		75.41			
AVERAGE					196.31	75.385	75.44	0.07	0.00	0.07
120.0	0.326	1.0	15	Auto	39.07		15.03			
120.0	0.326	1.0	15	Auto	39.07		15.02			
120.0	0.326	1.0	15	Auto	39.08		15.01			
120.0	0.326	1.0	15	Auto	39.62		15.01			
120.0	0.326	1.0	15	Auto	39.44		15.00			
AVERAGE					39.26	15.075	15.01	-0.40	0.00	-0.40

COMMENTS: NOx MEGAWATTS SYSTEM IS WITHIN THE +/- 0.5 % LIMIT.

NOx MW READS TAKEN FROM REAL TIME DATA LOGGER.

Asfound read=125557, As left= 125588

Tech: Manny Ancheta Signed: _____ Date: 11/27/2007

Contact information: Telephone No. (714) 895-0169 E-mail anchetma@sce.com



NOx MW TEST DATA

PHANTOM LOAD TEST

SINGLE PHASE X
 THREE PHASE

LOCATION MANDALAY GEN. STA. GENERATOR: UNIT #1 Aux CHARGES: 7693-9657

TRANSDUCER: SCI. COL. MODEL: XL31K5PAN7-SC SERIAL NO.: NONE

AMPS: 5 WATTS: 1250 VOLTS: 120 NOMINAL OUTPUT: 4to20 mA

ELEMENT: 2 WIRE: 3 PT RATIO: 35 CT RATIO: 600 MULT.: 21000

DISPLAY: Scientific Columbus MODEL: 6620 SERIAL NO.: 21223

STD. MODEL NO.: RD-21-352 SER. NO.: 201017 CALIB. DATE: 07/03/07 DUE DATE: 07/03/08

STD. ELEMENTS: 1

AS FOUND / AS LEFT

VOLTS	AMPS	PF	NOM. MW	STANDARD			NOx MW	NOx IND. % ERROR	STD. % ERROR	TRUE NOx % ERROR
				TAP	WATTS	MW				
120.0	5.000	1.0	25.2	Auto	599.97		25.162			
120.0	5.000	1.0	25.2	Auto	599.49		25.161			
120.0	5.000	1.0	25.2	Auto	599.49		25.166			
120.0	5.000	1.0	25.2	Auto	599.48		25.168			
120.0	5.000	1.0	25.2	Auto	599.70		25.179			
AVERAGE					599.63	25.184	25.167	-0.07	0.00	-0.07
120.0	5.000	0.5	12.6	Auto	300.44		12.623			
120.0	5.000	0.5	12.6	Auto	300.44		12.618			
120.0	5.000	0.5	12.6	Auto	300.41		12.613			
120.0	5.000	0.5	12.6	Auto	300.42		12.616			
120.0	5.000	0.5	12.6	Auto	300.43		12.615			
AVERAGE					300.42	12.618	12.617	-0.01	0.00	-0.01
120.0	2.500	1.0	12.6	Auto	299.96		12.601			
120.0	2.500	1.0	12.6	Auto	299.96		12.598			
120.0	2.500	1.0	12.6	Auto	299.95		12.598			
120.0	2.500	1.0	12.6	Auto	299.65		12.584			
120.0	2.500	1.0	12.6	Auto	299.65		12.584			
AVERAGE					299.83	12.593	12.593	0.00	0.00	0.00
120.0	1.000	1.0	5.04	Auto	120.39		5.060			
120.0	1.000	1.0	5.04	Auto	120.38		5.057			
120.0	1.000	1.0	5.04	Auto	120.38		5.057			
120.0	1.000	1.0	5.04	Auto	120.38		5.056			
120.0	1.000	1.0	5.04	Auto	120.39		5.056			
AVERAGE					120.38	5.056	5.057	0.02	0.00	0.02
120.0	0.500	1.0	2.52	Auto	60.072		2.525			
120.0	0.500	1.0	2.52	Auto	60.077		2.524			
120.0	0.500	1.0	2.52	Auto	60.078		2.523			
120.0	0.500	1.0	2.52	Auto	60.082		2.523			
120.0	0.500	1.0	2.52	Auto	60.089		2.523			
AVERAGE					60.08	2.523	2.524	0.01	0.00	0.01

COMMENTS: NOx MEGAWATT'S SYSTEM IS WITHIN THE +/- 0.5 % LIMIT.

NOx MW READS TAKEN FROM REAL TIME DATA LOGGER.

As found read=657301, As left= 657303

Tech: Manny Ancheta Signed: _____ Date: 11/27/2007

Contact information: Telephone No. (714) 895-0169 E-mail anchetma@sce.cm



NOx MW TEST DATA
PHANTOM LOAD TEST

SINGLE PHASE X
 THREE PHASE

LOCATION MANDALAY GEN. STA. GENERATOR: UNIT #2 GROSS CHARGES 7693-9657
 TRANSDUCER: SCI. COL. MODEL: XL31K5PAN7-SC SERIAL NO.: NONE
 AMPS: 5 WATTS: 1250 VOLTS: 120 NOMINAL OUTPUT: 4to20 mA
 ELEMENT: 2 WIRE: 3 PT RATIO: 120 CT RATIO: 1600 MULT.: 192000
 DISPLAY: Scientific Columbus MODEL: 6620 SERIAL NO.: 21224

STD. MODEL NO.: RD-21-352 SER. NO.: 201017 CALIB. DATE: 07/03/07 DUE DATE: 07/03/08
 STD. ELEMENTS: 1

AS FOUND / AS LEFT

VOLTS	AMPS	PF	NOM. MW	STANDARD			NOx MW	NOx IND. % ERROR	STD. % ERROR	TRUE NOx % ERROR
				TAP	WATTS	MW				
120.0	4.670	1.0	215	Auto	598.53		229.42			
120.0	4.670	1.0	215	Auto	598.36		229.43			
120.0	4.670	1.0	215	Auto	598.56		229.51			
120.0	4.670	1.0	215	Auto	598.34		229.43			
120.0	4.670	1.0	215	Auto	598.33		229.42			
AVERAGE					598.42	229.794	229.44	-0.15	0.00	-0.15
120.0	3.910	1.0	180	Auto	468.07		179.46			
120.0	3.910	1.0	180	Auto	468.07		179.49			
120.0	3.910	1.0	180	Auto	468.07		179.49			
120.0	3.910	1.0	180	Auto	468.06		179.50			
120.0	3.910	1.0	180	Auto	468.06		179.49			
AVERAGE					468.07	179.737	179.49	-0.14	0.00	-0.14
120.0	3.260	1.0	150	Auto	390.28		149.68			
120.0	3.260	1.0	150	Auto	390.27		149.68			
120.0	3.260	1.0	150	Auto	390.26		149.67			
120.0	3.260	1.0	150	Auto	390.27		149.67			
120.0	3.260	1.0	150	Auto	390.28		149.68			
AVERAGE					390.27	149.863	149.68	-0.12	0.00	-0.12
120.0	2.170	1.0	100	Auto	259.83		99.66			
120.0	2.170	1.0	100	Auto	259.84		99.67			
120.0	2.170	1.0	100	Auto	259.74		99.62			
120.0	2.170	1.0	100	Auto	259.74		99.62			
120.0	2.170	1.0	100	Auto	259.91		99.68			
AVERAGE					259.81	99.767	99.65	-0.12	0.00	-0.12
120.0	1.635	1.0	75	Auto	195.51		74.99			
120.0	1.635	1.0	75	Auto	195.68		75.05			
120.0	1.635	1.0	75	Auto	195.75		75.08			
120.0	1.635	1.0	75	Auto	195.66		75.04			
120.0	1.635	1.0	75	Auto	195.74		75.08			
AVERAGE					195.67	75.136	75.05	-0.12	0.00	-0.12
120.0	0.326	1.0	15	Auto	39.24		15.06			
120.0	0.326	1.0	15	Auto	39.21		15.05			
120.0	0.326	1.0	15	Auto	39.21		15.05			
120.0	0.326	1.0	15	Auto	39.18		15.04			
120.0	0.326	1.0	15	Auto	39.19		15.04			
AVERAGE					39.20	15.054	15.05	-0.04	0.00	-0.04

COMMENTS: NOX MEGAWATTS SYSTEM IS WITHIN THE +/- 0.5 % LIMIT.
NOX MW READS TAKEN FROM REAL TIME DATA LOGGER.
Asfound read=884364, As left= 884398

Tech: Manny Ancheta Signed: _____ Date: 11/27/2007
 Contact information: Telephone No. (714) 895-0169 E-mail anchetma@sce.cm



NOx MW TEST DATA

PHANTOM LOAD TEST

SINGLE PHASE X
 THREE PHASE

LOCATION MANDALAY GEN. STA. GENERATOR: UNIT #2 Aux CHARGES: 7693-9657

TRANSDUCER: SCI. COL. MODEL: XL31K5PAN7-SC SERIAL NO.: NONE

AMPS: 5 WATTS: 1250 VOLTS: 120 NOMINAL OUTPUT: 4to20 mA
 ELEMENT: 2 WIRE: 3 PT RATIO: 35 CT RATIO: 600 MULT.: 21000
 DISPLAY: Scientific Columbus MODEL: 6620 SERIAL NO.: 21225

STD. MODEL NO.: RD-21-352 SER. NO.: 201017 CALIB. DATE: 07/03/07 DUE DATE: 07/03/08
 STD. ELEMENTS: 1

AS FOUND / AS LEFT

VOLTS	AMPS	PF	NOM. MW	STANDARD			NOx MW	NOx IND. % ERROR	STD. % ERROR	TRUE NOx % ERROR
				TAP	WATTS	MW				
120.0	5.000	1.0	25.2	Auto	599.64		25.131			
120.0	5.000	1.0	25.2	Auto	599.63		25.137			
120.0	5.000	1.0	25.2	Auto	599.47		25.146			
120.0	5.000	1.0	25.2	Auto	599.46		25.147			
120.0	5.000	1.0	25.2	Auto	599.22		25.138			
AVERAGE					599.48	25.178	25.140	-0.15	0.00	-0.15
120.0	5.000	0.5	12.6	Auto	300.64		12.612			
120.0	5.000	0.5	12.6	Auto	300.70		12.624			
120.0	5.000	0.5	12.6	Auto	300.67		12.625			
120.0	5.000	0.5	12.6	Auto	300.50		12.616			
120.0	5.000	0.5	12.6	Auto	300.46		12.616			
AVERAGE					300.58	12.624	12.619	-0.05	0.00	-0.05
120.0	2.500	1.0	12.6	Auto	299.94		12.602			
120.0	2.500	1.0	12.6	Auto	299.96		12.593			
120.0	2.500	1.0	12.6	Auto	299.96		12.592			
120.0	2.500	1.0	12.6	Auto	299.97		12.594			
120.0	2.500	1.0	12.6	Auto	299.96		12.593			
AVERAGE					299.96	12.598	12.595	-0.03	0.00	-0.03
120.0	1.000	1.0	5.04	Auto	121.09		5.089			
120.0	1.000	1.0	5.04	Auto	121.11		5.086			
120.0	1.000	1.0	5.04	Auto	121.11		5.086			
120.0	1.000	1.0	5.04	Auto	121.09		5.084			
120.0	1.000	1.0	5.04	Auto	121.11		5.084			
AVERAGE					121.10	5.086	5.086	-0.01	0.00	-0.01
120.0	0.500	1.0	2.52	Auto	59.96		2.518			
120.0	0.500	1.0	2.52	Auto	59.96		2.517			
120.0	0.500	1.0	2.52	Auto	59.96		2.517			
120.0	0.500	1.0	2.52	Auto	59.94		2.516			
120.0	0.500	1.0	2.52	Auto	59.96		2.517			
AVERAGE					59.96	2.518	2.517	-0.05	0.00	-0.05

COMMENTS: NOX MEGAWATTS SYSTEM IS WITHIN THE +/- 0.5 % LIMIT.

NOX MW READS TAKEN FROM REAL TIME DATA LOGGER.

Asfound read=630710, As left= 630713

Tech: Manny Ancheta Signed: _____ Date: 11/27/2008
 Contact information: Telephone No. (714) 895-0169 E-mail anchetma@sce.cm



NOx MW TEST DATA

PHANTOM LOAD TEST

SINGLE PHASE X
 THREE PHASE

LOCATION MANDALAY GEN. STA. GENERATOR: UNIT #1&2 Res.Aux CHARGES: 7693-9657

TRANSDUCER: SCI. COL. MODEL: XL31K5PAN7-SC SERIAL NO.: NONE

AMPS: 5 WATTS: 1250 VOLTS: 120 NOMINAL OUTPUT: 4to20 mA
 ELEMENT: 2 WIRE: 3 PT RATIO: 35 CT RATIO: 1000 MULT.: 35000
 DISPLAY: Scientific Columbus MODEL: 6620 SERIAL NO.: 21221

STD. MODEL NO.: RD-21-352 SER. NO.: 201017 CALIB. DATE: 07/03/07 DUE DATE: 07/03/08
 STD. ELEMENTS: 1

AS FOUND /AS LEFT

VOLTS	AMPS	PF	NOM. MW	STANDARD			NOx MW	NOx IND. % ERROR	STD. % ERROR	TRUE NOx % ERROR
				TAP	WATTS	MW				
120.0	4.000	1.0	34.56	Auto	479.91		33.595			
120.0	4.000	1.0	34.56	Auto	479.92		33.609			
120.0	4.000	1.0	34.56	Auto	479.91		33.610			
120.0	4.000	1.0	34.56	Auto	479.91		33.611			
120.0	4.000	1.0	34.56	Auto	479.91		33.612			
AVERAGE					479.91	33.594	33.607	0.04	0.00	0.04
120.0	4.000	0.5	17.28	Auto	239.29		16.786			
120.0	4.000	0.5	17.28	Auto	239.30		16.769			
120.0	4.000	0.5	17.28	Auto	239.38		16.768			
120.0	4.000	0.5	17.28	Auto	239.29		16.765			
120.0	4.000	0.5	17.28	Auto	239.24		16.760			
AVERAGE					239.30	16.751	16.770	0.11	0.00	0.11
120.0	2.500	1.0	21	Auto	300.18		21.025			
120.0	2.500	1.0	21	Auto	300.18		21.026			
120.0	2.500	1.0	21	Auto	300.18		21.025			
120.0	2.500	1.0	21	Auto	300.18		21.026			
120.0	2.500	1.0	21	Auto	300.18		21.022			
AVERAGE					300.18	21.013	21.025	0.06	0.00	0.06
120.0	1.000	1.0	8.4	Auto	120.16		8.427			
120.0	1.000	1.0	8.4	Auto	120.16		8.421			
120.0	1.000	1.0	8.4	Auto	120.16		8.419			
120.0	1.000	1.0	8.4	Auto	120.16		8.418			
120.0	1.000	1.0	8.4	Auto	120.16		8.417			
AVERAGE					120.16	8.411	8.420	0.11	0.00	0.11
120.0	0.500	1.0	4.2	Auto	60.177		4.217			
120.0	0.500	1.0	4.2	Auto	60.138		4.213			
120.0	0.500	1.0	4.2	Auto	60.147		4.214			
120.0	0.500	1.0	4.2	Auto	60.154		4.213			
120.0	0.500	1.0	4.2	Auto	60.151		4.213			
AVERAGE					60.15	4.211	4.214	0.08	0.00	0.08

COMMENTS: NOX MEGAWATTS SYSTEM IS WITHIN THE +/- 0.5 % LIMIT. Megawattmeter replaced.

NOX MW READS TAKEN FROM REAL TIME DATA LOGGER.

Asfound read=130075, As left= 130082

As found load* 0.8 MW As left load:1.022 MW

Timeout:10:05 Time In:1:54

Tech: Manny Ancheta Signed: _____ Date: 11/27/2007

Contact information: Telephone No. (714) 895-0169 E-mail anchetma@sce.com

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Attachment 59N2 Conds #6 & #7	Description: Hourly Recordkeeping
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

CEMs Records and Operator Logs

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
- Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

The Station maintains operational records as detailed in Conditions 6 and 7. Such records are available to the District upon request.

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Attachment 70N3 - 13 Conds #1 - #8	Description: Phase 1 & 2 Vapor Recovery System
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Inspection, Maintenance, and Testing Records

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 2 of 2

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

It should be noted that the gasoline dispensing station dispenses about 1200 gallons per year.

Condition 1 – The above ground gasoline tank is equipped with a pressure-vacuum relief valve set at no less than 2.5 inches. A vapor recovery system is used and good practices are used to minimize spills and leaks.

Condition 2 – The Phase I vapor recovery equipment has a coaxial VRS system and a permanently installed submerged fill pipe. The VRS is maintained in good order.

Condition 3 – The Phase II VRS requirements uses a vapor balance system.

Condition 4 – Phase II Vapor Recovery Defects – The equipment is maintained in good condition.

Condition 5 – Required Signs Posted - The appropriate signs are posted and readily visible.

Condition 6 – Verification Testing Requirements – The site conducts static testing every year as required. The District determined in 1999 that the fuel dispensing facility was exempt from Condition 6.2

Condition 7 – Record-keeping Requirements – Records of all tests and repairs are maintained at the site.

Condition 8 – Reliant Energy agrees that if it seeks replacement or modification of the dispensing facility it will seek a permit to construct.

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Attachment 74.9N7 Conds #1 - #2	Description: Emergency Stationary Internal Combustion Engines
---	---

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Maintenance and Operating Logs

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

Hourly operating records that verify compliance with 50 hour per calendar year limit for the emergency generator and emergency firewater pump are maintained and available for District inspection. Reports of annual hours are submitted to the District in February of each year.

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Attachment ATCM Engine N1 Cond #2	Description: Hourly Operation limited to 20 hr/yr
---	---

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Operating Log Records

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 2 of 2

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

Records of hourly operation are maintained and show compliance with 20 hr/yr limit for non-emergency use.

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Attachment ATCM Engine N2 Cond #2	Description: Hourly Operation limited to 20 hr/yr
---	---

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Operating Log Records

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 2 of 2

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

Records of hourly operation are maintained and show compliance with 20 hr/yr limit for non-emergency use.

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Attachment 74.23N8 Conds #1 - #3	Description: Stationary Gas Turbines
--	--

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Inspections, Operating Logs, and Reports

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

- Condition 1 - A totalizing meter is installed and monthly records of operating hours are maintained.**
Condition 2 - Actual operating hours for each turbine are included on the attached spreadsheet.
Condition 3 - Actual operating hours are maintained below 200 hours/year. Any modifications will go through the Authority to Construct permitting process.

Date	1A&B	2A&B	3A&B	4A&B	Total Running Time	Standby Diesel Generator	Diesel Fire Pump	Gasoline pump	Diesel pump	Gasoline usage	Diesel usage
Oct 2007	3027.8	2916.3	2828.9	3087.8	5464.5	74.7	203.4	7594.4	2712.1	136.5	23.6
Nov 2007	3030.5	2919.1	2871.4	3089.6	5468.8	75.1	203.5	7730.9	2735.7	247.1	70.8
Dec 2007	3031.3	2820.0	2872.1	3090.2	5472.5	75.3	203.6	7978.0	2806.5	113.9	0
Jan 2008	3031.3	2820.0	2872.1	3090.2	5472.5	75.3	203.7	8091.9	2806.5	74.22	40.9
Feb 2008	3032.0	2920.4	2872.8	3090.8	5475.3	75.8	203.7	8166.1	2847.4	113.48	31.3
Mar 2008	3032.0	2920.4	2872.8	3090.8	5475.3	75.9	203.9	8279.6	2878.7	115	111.5
Apr 2008	3037.6	2925.9	2878.3	3095.9	5483.4	76.0	204.0	8394.6	2990.2	128.7	659.1
May 2008	3056.9	2945.6	2897.8	3115.6	5504.8	76.2	204.5	8523.3	3649.3	119.5	418
Jun 2008	3058.0	2946.8	2898.8	3116.8	5506.4	76.3	206.5	8642.8	4067.3	114.1	57.6
Jul 2008	3060.8	2949.7	2901.3	3119.5	5511.1	76.4	206.8	8756.9	4124.9	93.2	40.2
Aug 2008	3067.9	2956.8	2908.2	3126.6	5518.9	76.9	206.8	8850.1	4165.1	18.2	42.9
Sep 2008	3070.0	2959.0	2910.4	3128.4	5522.0	77.0	207.0	8868.3	4208.0	142.4	65
Oct 2008	3070.3	2959.3	2910.7	3128.7	5522.7	77.3	207.3	9010.7	4273.0		

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
 Applicable Requirement or Part 70 Permit Condition Attachment
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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Attachment 103N1-13 Conds #1 - #6	Description: Continuous Monitoring Systems
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

CEMs Inspection, Maintenance, Testing, and Reporting Records

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if compliance during the reporting period was continuous or intermittent:
 - Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 - Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition

4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”

5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment
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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

Conditions 1, 2 – A CEMS system is operated and maintained at the station Units 1 and 2 which meets the requirements of Rule 103.A.1 and 103.C.1. There were 6 breakdowns that are subject to 103N2, Condition 2. A summary of the breakdowns is included as an attachment.

Condition 3 – Monitored violations are reported to the District within 96 hours.

Condition 4 – Permanent CEMS records are maintained as required.

Condition 5 – Data is reduced according to Appendix F of 40 CFR, Part 75.

Condition 6 – CEMS and excess emission reports are submitted to the District monthly, and the District reviews records on a periodic basis.

Unit 1 RATA 10/18/07, Unit 2 RATA 09/17/07. Low O2% cal gas found expired 1/31/08 (used only for manual calcs only).

Reliant Energy Mandalay Breakdowns
Title V Compliance Year 10/01/2007 – 09/30/2008

- Breakdown of Unit 1 South Mixing Dampers (9/14/08)
- Breakdown of Gas Chromatograph and Barton flow computer (7/15/08)
- Breakdown of Gas Chromatograph internal timing (7/3/08)
- Breakdown of Gas Chromatograph - low hydrogen carrier gas (4/18/08)
- Breakdown of ammonia pump (1/22/08)
- Out of Control CEMs (1/19/08)
- Out of Control CEMs (1/18/08)
- Breakdown of Unit 2 – opacity associated with fuel/air upset (10/09/07)

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PO00013PC1 Condition #1	Description: Throughput and Consumption Monthly Records and Solvent Cleaning Additional Requirements
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Fuel Throughput/Consumption and Solvent Usage Records

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 2 of 2

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

Condition 1 - Monthly record-keeping of permitted throughput and consumption, including fuel consumption are maintained onsite. See the attached spreadsheet for documentation.

Excluded conditions are not identified as federally enforceable

Mandalay Generating Station

source must from monthly cems data

	Unit 1 Monthly Gas Usage HSCF	Unit 2 Monthly Gas Usage HSCF	Unit 1 + Unit 2 Gas Usage HSCF	12-month Gas Usage MMSCF	Unit 3 Monthly Gas Use MCF	12-month Cumulative Gas Use MMCF
Sep-02	1,484,820	7,520,653	9,005,473		39,692	
Oct-02	590,262	2,282,642	2,872,904		11,529	
Nov-02	1,853,033	4,745,612	6,598,645		18,712	
Dec-02	585,820	9,576	595,396		6,848	
Jan-03	0	0	0		0	
Feb-03	176,303	955,954	1,132,257		4,326	
Mar-03	2,751,338	3,275,352	6,026,690		26,127	
Apr-03	2,475,883	2,811,697	5,287,580		0	
May-03	272,315	2,783,467	3,055,782		9,001	
Jun-03	619,183	1,572,077	2,191,260		4,692	
Jul-03	5,853,229	6,786,664	12,639,893		8,149	
Aug-03	3,973,365	4,650,378	8,623,743	5,803	57,357	186.43
Sep-03	3,997,574	5,516,017	9,513,591	5,854	30,261	177.00
Oct-03	4,424,056	326,848	4,750,904	6,042	3,716	169.19
Nov-03	204,910	1,347,088	1,551,998	5,537	0	150.48
Dec-03	3,032,869	1,355,986	4,388,855	5,916	0	143.63
Jan-04	1,184,296	1,669,772	2,854,068	6,202	0	143.63
Feb-04	2,850,609	2,938,066	5,788,675	6,667	0	139.30
Mar-04	1,249,682	1,476,738	2,726,420	6,337	0	113.18
Apr-04	1,301,654	1,389,966	2,691,620	6,078	0	113.18
May-04	2,370,803	3,069,455	5,440,258	6,316	0	104.18
Jun-04	1,834,277	2,219,841	4,054,118	6,502	0	99.48
Jul-04	4,443,977	6,143,952	10,587,929	6,297	0	91.33
Aug-04	5,491,944	6,631,837	12,123,781	6,647	0	33.98
Sep-04	2,245,102	3,629,733	5,874,835	6,283	0	3.72
Oct-04	2,538,773	2,754,796	5,293,569	6,338	0	0.00
Nov-04	2,059,191	2,756,798	4,815,989	6,664	0	0.00
Dec-04	2,401,179	2,754,139	5,155,318	6,741	0	0.00
Jan-05	1,218,182	3,300,625	4,518,807	6,907	0	0.00
Feb-05	76,649	3,035	79,684	6,336	0	0.00
Mar-05	676,791	0	676,791	6,131	5,457	5.46
Apr-05	79,731	124,158	203,889	5,882	176	5.63
May-05	665,553	656,399	1,321,952	5,471	3,864	9.50
Jun-05	0	403,350	403,350	5,106	0	9.50
Jul-05	3,719,388	4,567,857	8,287,225	4,876	7,553	17.05
Aug-05	3,443,031	4,150,255	7,593,286	4,422	2,404	19.45
Sep-05	496,387	314,606	810,993	3,916	3,645	23.10
Oct-05	713,432	920,749	1,634,181	3,550	2,117	25.22
Nov-05	3,018,885	3,491,042	6,509,927	3,720	1,727	26.94
Dec-05	122,038	2,079,095	2,201,133	3,424	0	26.94
Jan-06	4,953	0	4,953	2,973	659	27.60
Feb-06	153,767	5,562	159,329	2,981	2,714	30.32
Mar-06	508,667	0	508,667	2,964	0	24.86

Mandalay Generating Station

Apr-06	354,163	1,390	355,553	2,979	702	25.39
May-06	2,077,825	1,811,391	3,889,216	3,236	429	21.95
Jun-06	2,069,934	1,712,982	3,782,916	3,574	51	22.00
Jul-06	6,596,415	6,699,000	13,295,415	4,075	24,859	39.31
Aug-06	1,509,014	2,314,105	3,823,119	3,698	2,699	39.60
Sep-06	1,825,674	3,606,520	5,432,194	4,160	3,098	39.06
Oct-06	6516.5	0	6516.5	3,997	0	36.94
Nov-06	780804.6	912181.2	1692985.8	3,515	1912	37.12
Dec-06	533491.5	1196267.1	1729758.6	3,468	13343	50.47
Jan-07	169080.3	328608.9	497689.2	3,517	809	50.62
Feb-07	0	0	0	3,501	0	47.90
Mar-07	0	357340.4	357340.4	3,486	4977	52.88
Apr-07	0	162803.8	162803.8	3,467	2	52.18
May-07	1655678.2	338699.32	1994377.52	3,278	1	51.75
Jun-07	2072465.2	3647874.8	5720340	3,471	2450	54.15
Jul-07	2569231.0	5720430.5	8289661.5	2,971	2697	31.99
Aug-07	4986322.5	5402787.5	10389110	3,627	15008	44.30
Sep-07	1830428.8	2229104.5	4059533.3	3,490	2	41.20
Oct-07	2768432.5	4027901.0	6796333.5	4,169	3813	45.01
Nov-07	1772223.5	385257.0	2157480.5	4,215	356	43.46
Dec-07	636138.1	1716005.8	2352143.9	4,278	6	30.12
Jan-08	1395191.8	2871089.8	4266281.6	4,655	251	29.56
Feb-08	2887.1	984117.5	987004.6	4,753	4	29.57
Mar-08	211560.2	976548.3	1188108.5	4,836	5983	30.57
Apr-08	0	2881142.5	2881142.5	5,108	15188	45.76
May-08	767610	1983337	2750947	5,184	703	46.46
Jun-08	1912245.8	2556165.5	4468411.3	5,059	2853	46.86
Jul-08	2270826.8	3816150.8	6086977.6	4,838	4579	48.75
Aug-08	3399237.8	4929460	8328697.8	4,632	1664	35.40
Sep-08	3275349.8	3749139.5	7024489.3	4,929	134	35.53
Oct-08			0	4,249		31.72
Nov-08			0	4,033		31.37
Dec-08			0	3,798		31.36
Jan-09			0	3,372		31.11
Feb-09			0	3,273		31.10
Mar-09			0	3,154		25.12
Apr-09			0	2,866		9.93
May-09			0	2,591		9.23
Jun-09			0	2,144		6.38
Jul-09			0	1,535		1.80
Aug-09			0	702		0.13
Sep-09			0	0		0.00
Oct-09			0	0		0.00
Nov-09			0	0		0.00
Dec-09			0	0		0.00

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Attachment 50 Conds #1 – #4	Description: Opacity Limitations
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Routine Visual Surveillance and Certification Records

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
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Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

Opacity readings were done on the following sources during the compliance period and are included as an attachment:

Main Units (Unit 1 and Unit 2)

Unit 3 (Turbine Peaking Unit)

Emergency Generator

Emergency Firewater Pump

Bead Blaster

2008 MANDALAY UNIT 1&2
ANNUAL OPACITY TEST



California Environmental Protection Agency
AIR RESOURCES BOARD

VISIBLE EMISSION EVALUATION PROGRAM

Information on Future Schedule and Locations:

Day Recert: http://www.arb.ca.gov/CAP/100_1.htm
Night Recert: http://www.arb.ca.gov/CAP/100_2.htm

If a photocopy of your qualification form is required, please send
a stamped self-addressed envelope to:
ARB, Enforcement Division, Compliance Assistance Section
P.O. Box 2815, Sacramento, CA 95812

Escarcega, Mike

Student ID #14859 is certified as a visible emission
evaluator based on the score achieved and the criteria
established by the U.S. EPA Reference Method 9

Certification expires: July 25, 2008


Authorized Signature

January 24, 2008
Course date

Certified for: 100.1 Average Dev. 4.6 White 5.6 Black
100.1 = day, 100.2 = night Sun glasses: White Black

RECORD OF VISIBLE EMISSIONS

Client/Location MANDALAY UNIT 1 Date 6/16/08

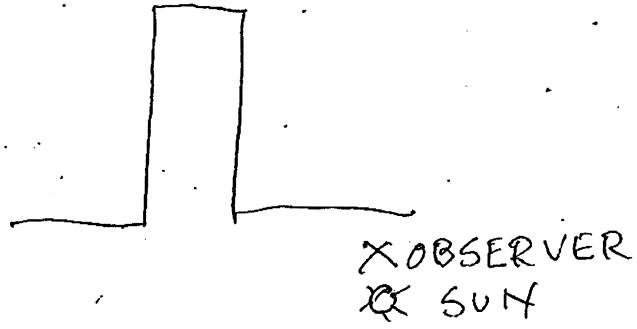
Unit 1 Fuel NAT. GAS Test No. 1 Observer M. ESCARCEGA

Weather Conditions CLOUDY WIND 5-10 mph

Observer's Location SEE SKETCH BELOW

Time					Comments	Time					Comments	
Hr	Min	Seconds				Hr	Min	Seconds				
		00	15	30	45			00	15	30	45	
	00							30	0	0	0	
	01							31	0	0	0	
	02							32				
	03							33				
	04							34				
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	18							48				
	19							49				
	20							50				
	21							51				
	22							52				
	23							53				
	24							54				
<u>08</u>	25	0	0	0	0			55				
	26	0	0	0	0			56				
	27	0	0	0	0			57				
	28	0	0	0	0			58				
	29	0	0	0	0			59				

Comments/Notes: STACK HEIGHT = 200 FT
UNIT LOAD = 20 MW
READINGS FROM ~ 500 FT. → WIND



RECORD OF VISIBLE EMISSIONS.

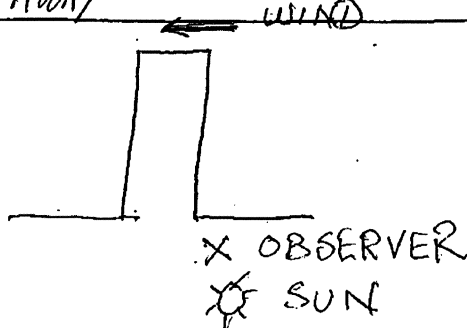
Client/Location MANDALAY G.S. UNIT 2 Date 3/10/08
 Unit 2 Fuel NAT. GAS Test No. 1 Observer M. ESCARCEGA
 Weather Conditions MOSTLY CLEAR - HIGH CIRRUS CLOUDS. 0-5 MPH
 Observer's Location SEE SKETCH BELOW

Time					Comments	Time					Comments	
Hr	Min	Seconds				Hr	Min	Seconds				
		00	15	30	45			00	15	30	45	
	00							30				
	01							31				
	02							32				
	03							33				
	04							34				
	05							35				
	06							36				
10	07	0	0	0	0			37				
	08	0	0	0	0			38				
	09	0	0	0	0			39				
	10	0	0	0	0			40				
	11	0	0	0	0			41				
	12	0	0	0	0			42				
	13	0	0	0	0			43				
	14	0	0	0	0			44				
	15							45				
	16							46				
	17							47				
	18							48				
	19							49				
	20							50				
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	22							52				
	23							53				
	24							54				
	25							55				
	26							56				
	27							57				
	28							58				
	29							59				

Comments/Notes: STACK HEIGHT = 200 FT.

UNIT LOAD ≈ 19.3 NET MW

READINGS FROM ≈ 500 FT. AWAY



2008 MANDALAY PEAKER & SMALL EQUIP.
TITLE V OPACITY TESTS



California Environmental Protection Agency
AIR RESOURCES BOARD

VISIBLE EMISSION EVALUATION PROGRAM

Information on Future Schedule and Locations:

Day Recert: http://www.arb.ca.gov/CAP/100_1.htm

Night Recert: http://www.arb.ca.gov/CAP/100_2.htm

If a photocopy of your qualification form is required, please send
a stamped self-addressed envelope to:
ARB, Enforcement Division, Compliance Assistance Section
P.O. Box 2815, Sacramento, CA 95812

Escarcega, Mike

Student ID #14859 is certified as a visible emission
evaluator based on the score achieved and the criteria
established by the U.S. EPA Reference Method 9

Certification expires: January 23, 2009


Authorized Signature

July 24, 2008
Course date

Certified for: 100.1 Average Dev. White Black
100.1 = day, 100.2 = night Sun glasses: 3.4 White 2.6 Black

RECORD OF VISIBLE EMISSIONS

Client/Location MANDALAY UNIT 3 Date 9/12/08

Unit 344 AIR Fuel NAT. GAS Test No. 1 Observer M. ESCARCEGA

Weather Conditions CLOUDY NO SUN WIND 0-5 MPH

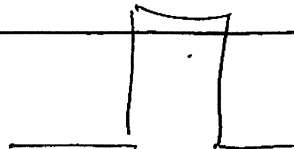
Observer's Location SEE SKETCH BELOW

Time					Comments	Time					Comments	
Hr	Min	Seconds				Hr	Min	Seconds				
		00	15	30		45			00	15		30
	00							30				
	01							31				
	02							32				
	03							33				
	04							34				
	05							35				
10	06	0	0	0	0			36				
	07	0	0	0	0			37				
	08	0	0	0	0			38				
	09	0	0	0	0			39				
	10	0	0	5	5			40				
	11	0	0	0	0			41				
	12	0	5	0	0			42				
	13							43				
	14							44				
	15							45				
	16							46				
	17							47				
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	22							52				
	23							53				
	24							54				
	25							55				
	26							56				
	27							57				
	28							58				
	29							59				

Comments/Notes: STACK HEIGHT = 50 FT

READINGS FROM 150 FT. AWAY

← WIND



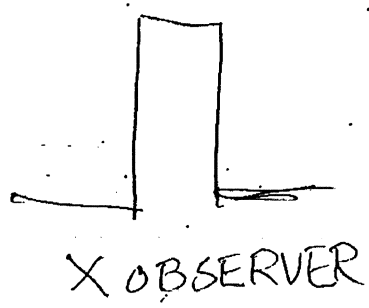
X OBSERVER

RECORD OF VISIBLE EMISSIONS

Client/Location MANDALAY UNIT 3 Date 9/12/08
 Unit 1 & 2 PAIR Fuel NAT. GAS Test No. 1 Observer M. ESCARCEGA
 Weather Conditions CLOUDY NO SUN WIND 0-5 mph
 Observer's Location SEE SKETCH BELOW

Time					Comments	Time					Comments	
Hr	Min	Seconds				Hr	Min	Seconds				
		00	15	30		45			00	15		30
	00							30				
	01							31				
	02							32				
	03							33				
	04							34				
	05							35				
10	06	0	0	0	0			36				
	07	0	0	0	0			37				
	08	0	0	0	0			38				
	09	0	0	0	0			39				
	10	0	0	0	0			40				
	11	0	0	0	0			41				
	12	0	0	0	0			42				
	13							43				
	14							44				
	15							45				
	16							46				
	17							47				
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	22							52				
	23							53				
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	26							56				
	27							57				
	28							58				
	29							59				

Comments/Notes: STACK HEIGHT = 50 FT.
READINGS FROM 3 150' AWAY
← WIND



RECORD OF VISIBLE EMISSIONS

Client/Location MANDALAY BEAD BLASTER Date 9/12/08

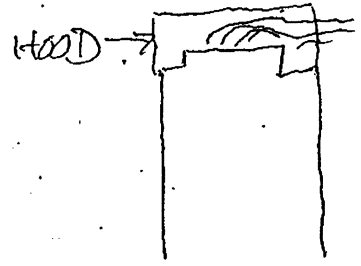
Unit _____ Fuel N/A Test No. 1 Observer M. ESCARCEGA

Weather Conditions CLOUDY - NO SUN - WIND 0-5 MPH

Observer's Location SEE SKETCH BELOW

Time					Comments	Time					Comments		
Hr	Min	Seconds				Hr	Min	Seconds					
		00	15	30		45			00	15		30	45
	00						09	30	0	0	0	0	
	01							31	0	0	0	0	
	02							32	0	0	0	0	
	03							33	0	0	0	0	
	04							34	0	0	0	0	
	05							35	0	0	0	0	
	06							36					
	07							37					
	08							38					
	09							39					
	10							40					
	11							41					
	12							42					
	13							43					
	14							44					
	15							45					
	16							46					
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	27							57					
	28							58					
	29							59					

Comments/Notes: STACK HEIGHT = 8 FT



X O BSERVER

RECORD OF VISIBLE EMISSIONS

Client/Location MANDALAY DIESEL AUX. ELEC. GEN Date 9/12/08

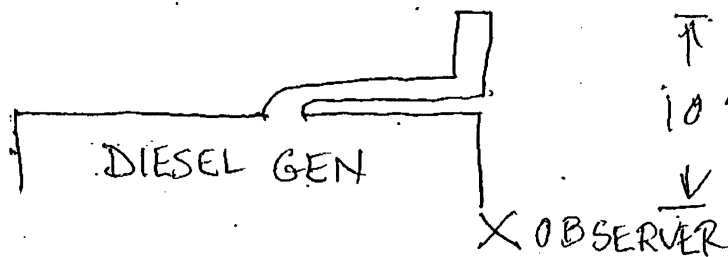
Unit _____ Fuel DIESEL Test No. 1 Observer M. ESCARCEGA

Weather Conditions CLOUDY-NO SUN, WIND 0-5 MPH

Observer's Location SEE SKETCH BELOW

Time					Comments	Time					Comments	
Hr	Min	Seconds				Hr	Min	Seconds				
		00	15	30		45			00	15		30
	00											
	01							30				
	02							31				
	03							32				
	04							33				
	05							34				
	06							35				
	07							36				
	08							37				
	09						09	38	0	0	0	0
	10							39	0	0	0	0
	11							40	0	0	0	0
	12							41	0	0	0	0
	13							42	0	0	0	0
	14							43	0	0	0	0
	15							44	0	0	0	0
	16							45				
	17							46				
	18							47				
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	20							49				
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	22							51				
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	24							53				
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	27							56				
	28							57				
	29							58				
								59				

Comments/Notes: STACK HEIGHT = 10 FT.



RECORD OF VISIBLE EMISSIONS

Client/Location MANDALAY SALT FIREWATER PUMP Date 9/12/08

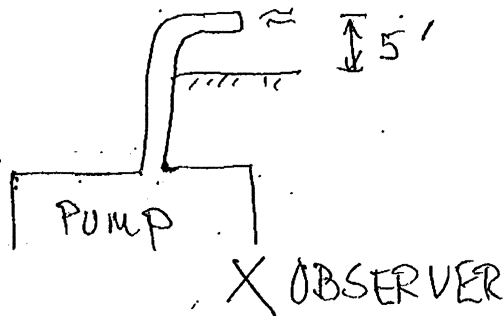
Unit _____ Fuel DIESEL Test No. 1 Observer M. ESCARCEGA

Weather Conditions CLOUDY - NO SUN WIND 0 - 5 MPH

Observer's Location SEE SKETCH BELOW

Time					Comments	Time					Comments	
Hr	Min	Seconds				Hr	Min	Seconds				
		00	15	30		45			00	15		30
	00											
	01							30				
	02							31				
	03							32				
	04							33				
	05							34				
	06							35				
	07							36				
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	11							40				
	12							41				
	13							42				
	14							43				
	15							44				
	16							45				
	17							46				
	18							47				
	19							48				
	20						09	49	0	5	5	0
	21							50	5	0	10	5
	22							51	0	5	5	0
	23							52	5	5	0	10
	24							53	0	5	0	0
	25							54	5	0	0	5
	26							55				
	27							56				
	28							57				
	29							58				
								59				

Comments/Notes: STACK HEIGHT = 5 FT



Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

<p>Citation, Including Attachment Number and/or Permit Condition Number: Attachment 52 Conds #1 - #2</p>	<p>Description: Particulate Matter Concentration (Grain Loading)</p>
--	---

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

<p>Emission Calculations Using Approved AP-42 Emission Factors</p>

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
- Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 2 of 2

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

See the attached District analysis to confirm compliance.

VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT
Memorandum

TO: Interested Parties

DATE: December 8, 1997

FROM: John Harader

SUBJECT: Rule 52 / AP-42 Emission Factor Comparison

District Rule 52, "Particulate Matter - Concentration (Grain Loading)", limits the concentration (or grain loading) of particulate matter. As shown on the attached copy of Rule 52, the limit is in units of Grains per Cubic Foot of Dry Gas at Standard Conditions and varies with the volume discharged (exhaust) in units of cubic feet per minute calculated at standard conditions.

In order to compare the Rule 52 emission limits to EPA AP-42 emission factors for combustion equipment, the exhaust flow rates (dcfm) listed in the rule can be converted to the fuel input rate or the horsepower input. Also the emission concentration limit of grains per dcf can be converted to pounds particulate matter emitted per fuel throughput. The attached tables (Nos. 1 - 4) state the assumptions and equations used in the conversion of the Rule 52 table. Standard F-factors (as found in 40 CFR, Part 60, Appendix A, Method 19) and Higher Heating Values were used. Typical stack oxygen percentages of three percent for external combustion, fifteen percent for diesel engines and lean burn natural gas engines, and one percent for rich burn natural gas engines were used in the conversion equations. The comparison has been done for boilers and process heaters fired on natural gas (Table 1) and Fuel Oil (Table 3) and engines fired on natural gas (Table 2) and diesel (Table 4).

For each table, the first set of columns shows the conversion of the Rule 52 exhaust flow rates (dcfm) to fuel input rates (MMBTU/Hr) for the external combustion units or the equivalent horsepower input for the engines. The second set of columns shows the conversion of the grains per dscf concentration limit to a pounds particulate matter per fuel throughput limit. The third set of columns lists the EPA AP-42 emission factors and asks if the AP-42 emission factor is less than the emission factor generated from Rule 52.

The EPA AP-42 emission factors are less than the emission limits imposed by Rule 52 for all fuel input rates of boilers and process heaters on either natural gas or fuel oil; for all rich burn natural gas engines; for lean burn engines up to 387,590 BHP; and for diesel engines up to 146,970 BHP. Natural gas engines greater than 387,590 BHP and Diesel engines greater than 146,970 BHP are uncommon; and the District does not have any engines of these sizes on permit. Therefore, the EPA AP-42 particulate matter

emission factors, which are used for District Permitted Emission calculations, are less than the limits imposed by Rule 52 for boilers, process heaters, and engines. Rule 52 does not apply to steam generators or gas turbines.

m:\titlev\rule52comp

Rule 52. Particulate Matter - Concentration (Grain Loading) (Adopted 7/2/68,
Revised and Renumbered 10/22/68, Revised 5/23/72)

A person shall not discharge into the atmosphere from any source particulate matter in excess of the concentration shown in the following table (see Rule 52 Table).

Where the volume discharged falls between figures listed in the Table, the exact concentration permitted to be discharged shall be determined by linear interpolation.

The provisions of this Rule shall not apply to emissions resulting from the combustion of liquid or gaseous fuels in steam generators or gas turbines.

For the purposes of this Rule "particulate matter" includes any material which would become particulate matter if cooled to standard conditions.

CONCENTRATION
(Grain Loading)

TABLE FOR RULE 52

VOLUME DIS- CHARGED -- Cubic Feet Per Minute Calculated at Standard Conditions	MAXIMUM CONCENTRATION OF PARTICULATE MATTER ALLOWED IN DISCHARGED GAS -- Grains Per Cubic Foot of Dry Gas at Standard Conditions	VOLUME DIS- CHARGED -- Cubic Feet Per Minute Calculated at Standard Conditions	MAXIMUM CONCENTRATION OF PARTICULATE MATTER ALLOWED IN DISCHARGED GAS -- Grains Per Cubic Foot of Dry Gas at Standard Conditions
<u>DCFM</u>	<u>GR/DCF</u>	<u>DCFM</u>	<u>GR/DCF</u>
1,000 or less	0.2000	20,000	0.0635
1,200	0.1870	30,000	0.0544
1,400	0.1760	40,000	0.0487
1,600	0.1670	50,000	0.0447
1,800	0.1600	60,000	0.0417
2,000	0.1530	70,000	0.0393
2,500	0.1410	80,000	0.0374
3,000	0.1310	100,000	0.0343
3,500	0.1240	200,000	0.0263
4,000	0.1180	400,000	0.0202
5,000	0.1080	600,000	0.0173
6,000	0.1010	800,000	0.0155
7,000	0.0949	1,000,000	0.0142
8,000	0.0902	1,500,000	0.0122
10,000	0.0828	2,000,000	0.0109
15,000	0.0709	2,500,000	0.0100
		or more	

Table 1

Rule 52, "Particulate Matter - Concentration (Grain Loading)"
 Comparison to AP-42 Emission Factors
 Boilers and Process Heaters Fired on Natural Gas

Assumptions: F-Factor Natural Gas = 8,740 DSCF/MMBTU
 HHV Natural Gas = 1,050 MMBTU/MMCF
 Stack Gas Oxygen = 3%

Equations: $MMBTU/Hr = (DCFM)(1/F-factor)(60min/hr)(20.9\%O_2/20.9)$
 $lb/mmcf = (Gr/DSCF)(lb/7000Gr)(F-factor)(HHV)(20.9/20.9\%O_2)$

Rule 52 DCFM Exhaust	Equivalent Fuel Input MMBTU/Hr	Rule 52 Emission limit		AP-42 Emission Factors	
		Gr/DCF	converted to lb/mmcf	lb/mmcf	< Rule 52 ?
< 1,000	< 5.9	0.2000	306.1	12.0	Yes
1,000	5.9	0.2000	306.1	12.0	Yes
1,200	7.1	0.1870	286.2	12.0	Yes
1,400	8.2	0.1760	269.4	12.0	Yes
1,600	9.4	0.1670	255.6	12.0	Yes
1,800	10.6	0.1600	244.9	13.7	Yes
2,000	11.8	0.1530	234.2	13.7	Yes
2,500	14.7	0.1410	215.8	13.7	Yes
3,000	17.6	0.1310	200.5	13.7	Yes
3,500	20.6	0.1240	189.8	13.7	Yes
4,000	23.5	0.1180	180.6	13.7	Yes
5,000	29.4	0.1080	165.3	13.7	Yes
6,000	35.3	0.1010	154.6	13.7	Yes
7,000	41.2	0.0949	145.3	13.7	Yes
8,000	47.0	0.0902	138.1	13.7	Yes
10,000	58.8	0.0828	126.7	13.7	Yes
15,000	88.2	0.0709	108.5	13.7	Yes
20,000	117.6	0.0635	97.2	3.0	Yes
30,000	176.4	0.0544	83.3	3.0	Yes
40,000	235.2	0.0487	74.5	3.0	Yes
50,000	294.0	0.0447	68.4	3.0	Yes
60,000	352.8	0.0417	63.8	3.0	Yes
70,000	411.6	0.0393	60.2	3.0	Yes
80,000	470.4	0.0374	57.2	3.0	Yes
100,000	588.0	0.0343	52.5	3.0	Yes
200,000	1,175.9	0.0263	40.3	3.0	Yes
400,000	2,351.8	0.0202	30.9	3.0	Yes
600,000	3,527.8	0.0173	26.5	3.0	Yes
800,000	4,703.7	0.0155	23.7	3.0	Yes
1,000,000	5,879.6	0.0142	21.7	3.0	Yes
1,500,000	8,819.4	0.0122	18.7	3.0	Yes
2,000,000	11,759.2	0.0109	16.7	3.0	Yes
2,500,000	14,699.0	0.0100	15.3	3.0	Yes

Table 2

Rule 52, "Particulate Matter - Concentration (Grain Loading)"
 Comparison to AP-42 Emission Factors
 Engines Fired on Natural Gas

Assumptions: F-Factor Natural Gas = 8,740 DSCF/MMBTU
 HHV Natural Gas = 1,050 MMBTU/MMCF
 Engine Efficiency = 10,000 BTU/BHP-Hr
 Stack Gas Oxygen = 1% for rich burn engines
 Stack Gas Oxygen = 15% for lean burn engines

Equations: $BHP = (DCFM)(1/F\text{-factor})(60\text{min/hr})(1/\text{engine efficiency})(10E6)(20.9\text{-}\%O_2/20.9)$
 $lb/mmcf = (Gr/DSCF)(lb/7000Gr)(F\text{-factor})(HHV)(20.9/20.9\text{-}\%O_2)$

Rule 52 DCFM Exhaust	Equivalent Engine BHP		Rule 52 Emission limit			AP-42 Emission Factors			
	Rich Burn	Lean Burn	Gr/DSCF	converted to lb/mmcf		Rich Burn Engine		Lean Burn Engine	
				Rich Burn	Lean Burn	lb/mmcf	< Rule 52 ?	lb/mmcf	< Rule 52 ?
< 1,000	< 653.7	< 193.8	0.2000	275.4	928.8	0.74	Yes	48.3	Yes
1,000	653.7	193.8	0.2000	275.4	928.8	0.74	Yes	48.3	Yes
1,200	784.4	232.6	0.1870	257.5	868.4	0.74	Yes	48.3	Yes
1,400	915.1	271.3	0.1760	242.3	817.4	0.74	Yes	48.3	Yes
1,600	1,045.8	310.1	0.1670	229.9	775.6	0.74	Yes	48.3	Yes
1,800	1,176.6	348.8	0.1600	220.3	743.0	0.74	Yes	48.3	Yes
2,000	1,307.3	387.6	0.1530	210.7	710.5	0.74	Yes	48.3	Yes
2,500	1,634.1	484.5	0.1410	194.1	654.8	0.74	Yes	48.3	Yes
3,000	1,961.0	581.4	0.1310	180.4	608.4	0.74	Yes	48.3	Yes
3,500	2,287.8	678.3	0.1240	170.7	575.9	0.74	Yes	48.3	Yes
4,000	2,614.6	775.2	0.1180	162.5	548.0	0.74	Yes	48.3	Yes
5,000	3,268.3	969.0	0.1080	148.7	501.6	0.74	Yes	48.3	Yes
6,000	3,921.9	1,162.8	0.1010	139.1	469.0	0.74	Yes	48.3	Yes
7,000	4,575.6	1,356.6	0.0949	130.7	440.7	0.74	Yes	48.3	Yes
8,000	5,229.2	1,550.4	0.0902	124.2	418.9	0.74	Yes	48.3	Yes
10,000	6,536.5	1,938.0	0.0828	114.0	384.5	0.74	Yes	48.3	Yes
15,000	9,804.8	2,906.9	0.0709	97.6	329.3	0.74	Yes	48.3	Yes
20,000	13,073.0	3,875.9	0.0635	87.4	294.9	0.74	Yes	48.3	Yes
30,000	19,609.6	5,813.9	0.0544	74.9	252.6	0.74	Yes	48.3	Yes
40,000	26,146.1	7,751.9	0.0487	67.1	226.2	0.74	Yes	48.3	Yes
50,000	32,682.6	9,689.8	0.0447	61.5	207.6	0.74	Yes	48.3	Yes
60,000	39,219.1	11,627.8	0.0417	57.4	193.7	0.74	Yes	48.3	Yes
70,000	45,755.6	13,565.7	0.0393	54.1	182.5	0.74	Yes	48.3	Yes
80,000	52,292.2	15,503.7	0.0374	51.5	173.7	0.74	Yes	48.3	Yes
100,000	65,365.2	19,379.6	0.0343	47.2	159.3	0.74	Yes	48.3	Yes
200,000	130,730.4	38,759.3	0.0263	36.2	122.1	0.74	Yes	48.3	Yes
400,000	261,460.8	77,518.5	0.0202	27.8	93.8	0.74	Yes	48.3	Yes
600,000	392,191.2	116,277.8	0.0173	23.8	80.3	0.74	Yes	48.3	Yes
800,000	522,921.6	155,037.1	0.0155	21.3	72.0	0.74	Yes	48.3	Yes
1,000,000	653,652.0	193,796.3	0.0142	19.6	65.9	0.74	Yes	48.3	Yes
1,500,000	980,478.0	290,694.5	0.0122	16.8	56.7	0.74	Yes	48.3	Yes
2,000,000	1,307,304.0	387,592.7	0.0109	15.0	50.6	0.74	Yes	48.3	Yes
2,500,000	1,634,130.1	484,490.8	0.0100	13.8	46.4	0.74	Yes	48.3	Yes

Table 3

Rule 52, "Particulate Matter - Concentration (Grain Loading)"
 Comparison to AP-42 Emission Factors
 Boilers and Process Heaters Fired on Fuel Oil

Assumptions: F-Factor Natural Gas = 9,220 DSCF/MMBTU
 HHV = 141 MMMBTU/MGallon
 Stack Gas Oxygen = 3%

Equations: $MMBTU/Hr = (DCFM)(1/F\text{-factor})(60min/hr)(20.9\text{-}\%O_2/20.9)$
 $lb/Mgal = (Gr/DSCF)(lb/7000Gr)(F\text{-factor})(HHV)(20.9/20.9\text{-}\%O_2)$

Rule 52 DCFM Exhaust	Equivalent Fuel Input MMBTU/Hr	Rule 52 Emission limit		AP-42 Emission Factors	
		Gr/DCF	converted to lb/Mgal	lb/Mgal	< Rule 52 ?
< 1,000	< 5.6	0.2000	43.4	2	Yes
1,000	5.6	0.2000	43.4	2	Yes
1,200	6.7	0.1870	40.5	2	Yes
1,400	7.8	0.1760	38.2	2	Yes
1,600	8.9	0.1670	36.2	2	Yes
1,800	10.0	0.1600	34.7	2	Yes
2,000	11.1	0.1530	33.2	2	Yes
2,500	13.9	0.1410	30.6	2	Yes
3,000	16.7	0.1310	28.4	2	Yes
3,500	19.5	0.1240	26.9	2	Yes
4,000	22.3	0.1180	25.6	2	Yes
5,000	27.9	0.1080	23.4	2	Yes
6,000	33.4	0.1010	21.9	2	Yes
7,000	39.0	0.0949	20.6	2	Yes
8,000	44.6	0.0902	19.6	2	Yes
10,000	55.7	0.0828	18.0	2	Yes
15,000	83.6	0.0709	15.4	2	Yes
20,000	111.5	0.0635	13.8	2	Yes
30,000	167.2	0.0544	11.8	2	Yes
40,000	222.9	0.0487	10.6	2	Yes
50,000	278.7	0.0447	9.7	2	Yes
60,000	334.4	0.0417	9.0	2	Yes
70,000	390.1	0.0393	8.5	2	Yes
80,000	445.9	0.0374	8.1	2	Yes
100,000	557.3	0.0343	7.4	2	Yes
200,000	1,114.7	0.0263	5.7	2	Yes
400,000	2,229.4	0.0202	4.4	2	Yes
600,000	3,344.1	0.0173	3.8	2	Yes
800,000	4,458.8	0.0155	3.4	2	Yes
1,000,000	5,573.5	0.0142	3.1	2	Yes
1,500,000	8,360.2	0.0122	2.6	2	Yes
2,000,000	11,147.0	0.0109	2.4	2	Yes
2,500,000	13,933.7	0.0100	2.2	2	Yes

Table 4

Rule 52, "Particulate Matter - Concentration (Grain Loading)"
 Comparison to AP-42 Emission Factors
 Engines Fired on Diesel

Assumptions: F-Factor = 9,220 DSCF/MMBTU
 HHV = 141,000 BTU/Gallon = 141 MMBTU/Mgal
 Engine Efficiency = 10,000 BTU/BHP-Hr
 Stack Gas Oxygen = 15%

Equations: $BHP = (DCFM)(1/F\text{-factor})(60\text{min/hr})(1/\text{engine efficiency})(10E6)(20.9\text{-}\%O_2/20.9)$
 $lb/Mgal = (Gr/DSCF)(lb/7000Gr)(F\text{-factor})(HHV)(20.9/20.9\text{-}\%O_2)$

Rule 52 DCFM Exhaust	Equivalent Engine BHP	Rule 52 Emission limit		AP-42 Emission Factors	
		Gr/DCF	converted to lb/Mgal	lb/Mgal	< Rule 52 ?
< 1,000	< 183.7	0.2000	131.6	43.7	Yes
1,000	183.7	0.2000	131.6	43.7	Yes
1,200	220.4	0.1870	123.0	43.7	Yes
1,400	257.2	0.1760	115.8	43.7	Yes
1,600	293.9	0.1670	109.9	43.7	Yes
1,800	330.7	0.1600	105.3	43.7	Yes
2,000	367.4	0.1530	100.7	43.7	Yes
2,500	459.3	0.1410	92.8	43.7	Yes
3,000	551.1	0.1310	86.2	43.7	Yes
3,500	643.0	0.1240	81.6	9.8	Yes
4,000	734.8	0.1180	77.6	9.8	Yes
5,000	918.5	0.1080	71.1	9.8	Yes
6,000	1,102.2	0.1010	66.4	9.8	Yes
7,000	1,286.0	0.0949	62.4	9.8	Yes
8,000	1,469.7	0.0902	59.3	9.8	Yes
10,000	1,837.1	0.0828	54.5	9.8	Yes
15,000	2,755.6	0.0709	46.6	9.8	Yes
20,000	3,674.1	0.0635	41.8	9.8	Yes
30,000	5,511.2	0.0544	35.8	9.8	Yes
40,000	7,348.3	0.0487	32.0	9.8	Yes
50,000	9,185.4	0.0447	29.4	9.8	Yes
60,000	11,022.4	0.0417	27.4	9.8	Yes
70,000	12,859.5	0.0393	25.9	9.8	Yes
80,000	14,696.6	0.0374	24.6	9.8	Yes
100,000	18,370.7	0.0343	22.6	9.8	Yes
200,000	36,741.4	0.0263	17.3	9.8	Yes
400,000	73,482.9	0.0202	13.3	9.8	Yes
600,000	110,224.3	0.0173	11.4	9.8	Yes
800,000	146,965.7	0.0155	10.2	9.8	Yes
1,000,000	183,707.1	0.0142	9.3	9.8	No
1,500,000	275,560.7	0.0122	8.0	9.8	No
2,000,000	367,414.3	0.0109	7.2	9.8	No
2,500,000	459,267.9	0.0100	6.6	9.8	No

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Attachment 54.B.1 Conds #1 - #3	Description: Sulfur Compounds
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Fuel Sulfur Analyses

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
- Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

See fuel sulfur sample analysis - attached as compliance verification for Rule 64.B.1.

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Attachment 54.B.2 Conds #1 - #3	Description: Sulfur Compounds Ground Level
---	--

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Modeling Demonstration and/or Sample Analysis
--

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

Units 1, 2, and the auxiliary boilers burn PUC quality natural gas. A fuel sulfur sample analysis is verified annually and maintained on site (also attached to hereunder to the compliance verification for Rule 64.B.1). See the attached District analysis for confirmation of compliance for the diesel-fired emergency generator and firewater pump.

TU: Keith

FIRM: Kerby Z.

IE: Rule 54.B.2

Keith,

The Title V "Attachment 54.B.2" was not necessarily intended to require full scale modeling to demonstrate compliance. We did distribute the attached memo "Rule 54.B.2 Compliance" dated May 23, 1996 to help out permit holders.

Except for someone like Pacific Custom Materials, this applies ~~only~~ to combustion equipment like engines, boilers, and turbines. At a bare minimum, they should be able to have the sulfur content of the fuel available; and some material balance calculations or source test info showing ppmv in exhaust stack.

Gas fired equipment burning PVC gas should not be a problem. For diesel fired equipment, info like stack height and property line info should be available to compare to District memo.

See me to discuss further,

Tuks,
Kerby Z.

VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT
Memorandum

TO: Karl Krause

DATE: May 23, 1996

FROM: Terri Thomas *TT*

SUBJECT: Rule 54.B.2 Compliance

Per your request, I ran some screening level dispersion modeling tests to determine equipment parameters that would comply with Rule 54.B.2. Rule 54.B.2 limits ground level property line SO₂ concentrations to 0.25 ppm_v for 1 hour and 0.04 ppm_v for 24 hours.

I assume that the most common SO₂ emission source is diesel combustion in IC engines. Therefore, that was the focus of my analysis.

To determine appropriate stack parameters, I reviewed 4 source test reports for diesel ICEs prepared for AB 2588. For screening purposes, the most conservative value was chosen from the test data for each stack parameter. The following summarizes stack data from these reports:

Parameter	# tests reporting parameter value	range of values	screening value
Stack velocity	3	1,812-11,343 ft/min	1,812 ft/min 9.2 m/s
Stack diameter	3	2-6 inches	2 inches 0.05 meters
Stack temperature	4	192-785°F	192°F 362 K
Stack height	0	NA	2 meters

SO₂ emissions were based on 300 ppm_v in the stack, which is the limit in Rule 54.B.1.a. This limit cannot be exceeded if the diesel fuel meets the 0.5% sulfur limit in Rule 64.B.2.

Other assumptions used in modeling were that the stack was vertical and has no raincap, and the property line was at least 100 meters from the stack.

Using the parameters and assumptions listed above, screening modeling showed that the limits in Rule 54.B.2 would not be exceeded.

Use of the minimum stack diameter, and thus, the minimum flow rate and emission rate is not the most conservative case. In order to determine the maximum emission rate that could be shown to meet the Rule under the conditions described above, modeling was performed by increasing the emissions and flow rate (to maintain the 300 ppm_v SO₂ stack concentration), but increasing the stack diameter to maintain the minimum velocity. Modeling results are summarized below.

Emission rate (g/s)	Emission rate (lb/hr) and (lb/day)	1 hour max concentration (ppm _v) (limit=0.25)	24 hour max concentration (ppm _v) (limit=0.04)
0.0145	0.12 2.76	0.04	0.01
0.029	0.23 5.52	0.06	0.03
0.058	0.46 11.04	0.11	0.04
0.116	0.92 22.08	0.17	0.07
0.232	1.84 44.15	0.23	0.05

From the above, if SO₂ emissions do not exceed 1.84 lb/hr, the 1-hour limit of Rule 54.B.2 will be met. This is equivalent to burning 26 gallons of diesel at 0.5% sulfur per hour.

If SO₂ emissions do not exceed 11.04 lb/day, the 24-hour limit of Rule 54.B.2 will be met. This is equivalent to burning 155 gallons of diesel at 0.5% sulfur per day.

If the sulfur content of the fuel is lower than 0.5%, the allowable amount of fuel would, of course, be greater.

Let me know if the above information meets your needs. If so, another scenario that is probably common is a nonvertical stack (or stack with raincap). I can develop similar information for this case if you want.

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

<p>Citation, Including Attachment Number and/or Permit Condition Number: Attachment 57.B Conds #1 - #2</p>	<p>Description: Combustion Contaminants</p>
--	--

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

<p>Emission Calculations Using Approved AP-42 Emission Factors</p>

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
- Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
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Form TVPF46/07-21-03 Page 2 of 2

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

See the attached District analysis to confirm compliance.

VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT
Memorandum

TO: Interested Parties

DATE: September 3, 1998

FROM: John Harader

SUBJECT: Rule 57.B / AP-42 Emission Factor Comparison

Section B of District Rule 57, "Combustion Contaminants - Specific", limits the combustion contaminant emission concentration from any fuel burning equipment. Combustion contaminants are defined in District Rule 2 as particulate matter discharged into the atmosphere from the burning of any kind of material containing carbon in a free or combined state. The emission concentration limit is 0.1 grain per cubic foot of gas calculated to 12 percent of carbon dioxide at standard conditions (0.1 gr/scf @ 12% CO₂). This limit can be converted to a lb/MMBTU emission factor by the following equation from 40 CFR Part 60, Appendix A, Method 19:

$$E = C F_c (100/\%CO_2)(lb/7000gr)$$

E = lb/MMBTU emission factor

C = Pollutant concentration (lb/DSCF)

F_c = CO₂ F-factor

= 1430 dscf CO₂/MMBTU for liquid fuels

= 1040 dscf CO₂/MMBTU for natural gas

The pollutant concentration, C, and the %CO₂ values can be wet or dry as long as they are consistent. The %CO₂ of 12 may be used in the equation if the pollutant concentration has been corrected to 12% CO₂:

$$C_{@12\%CO_2} = C(12/\%CO_2)$$

The Rule 57.B emission limit is a limit at 12% CO₂; therefore the emission rate equation can be written:

$$E = (0.1 \text{ gr/scf}) F_c (100/12)(lb/7000gr)$$

For Natural Gas: E = 0.12 lb PM/MMBTU

For Liquid Fuels: E = 0.17 lb PM/MMBTU

Based on EPA AP-42 emission factors and source test data, all natural gas fired or fuel oil fired boilers, process heaters, and turbines; and natural gas fired or diesel fired

engines operate below this emission factor or emission limit. The particulate matter emission factors for these units are:

Natural Gas Fired Units	Rule 57.B Factor = 0.12 lb PM / MMBTU	
Boiler > 100 MMBTU/Hr	3 lb/mmcf	0.00286 lb / MMBTU
Boiler 10 - 100 MMBTU/Hr	13.7 lb/mmcf	0.0131 lb / MMBTU
Boiler < 10 MMBTU/Hr	12 lb/mmcf	0.0114 lb / MMBTU
Turbine		0.0419 lb / MMBTU
Lean Burn Engine		0.046 lb / MMBTU
Rich Burn Engine		0.0007 lb / MMBTU

Fuel Oil or Diesel Fired Units	Rule 57.B Factor = 0.17 lb PM / MMBTU	
Fuel Oil Fired Boiler	2 lb / Mgal	0.014 lb / MMBTU
Fuel Oil Fired Turbine		0.061 lb/ MMBTU
Diesel Engine > 600 HP		0.062 lb/ MMBTU

Compliance with the emission limit for diesel engines < 600 HP has been shown through the conducting of a source test on an engine within Ventura County. This source test was conducted for the purpose of generating an emission factor to be used for Air Toxic "Hot Spots" emission estimations. The measured particulate concentration for this engine was 0.1 gr/dscf at 12 percent CO₂. The engine source test was a Cummins NTA engine rated at 335 horsepower at 2100 rpm. The source test was conducted July 29, 1992.

m:\titlev\rule57.Bcomp

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Attachment 64.B.1 Conds #1 - #4	Description: Sulfur Content of Gaseous Fuels
---	--

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Fuel Sulfur Analyses and/or PUC fuel Purchase Records
--

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

PUC-Regulated Natural Gas is combusted at this facility. See attached fuel gas sulfur analysis for documentation.

Prepared For: Mandalay Generating Station March 17, 2008
393 North Harbor Blvd.
Oxnard, CA 93035

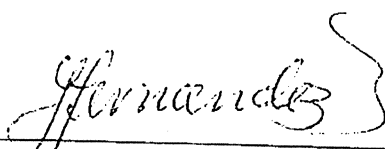
ATTENTION: Bohdan Jan Siekiel-Zdzienicki

Laboratory No: 080652 Sampled By: Client
Date Received: 10-MAR-08 ID: See Below
Project: Annual Nat. Gas Sample

RESULTS

On March 10, 2008, one (1) sample was received for analysis by Capco Analytical Services, Inc. The sample was identified and assigned the lab number listed below. This report consists of 2 pages excluding the cover letter and the Chain of Custody.

<u>SAMPLE DESCRIPTION</u>	<u>CAS LAB NUMBER</u>
MAIN GAS HDR TO U-2	08065201



Franz R. Fernandez, Ph.D.
Director - Analytical Operations

This report shall not be reproduced except in full without the written approval of Capco Analytical Services, Inc.
The test results reported represent only the items being tested and may not represent the entire material from which the sample was taken.

Client:	MANDALAY GENERATING STATION	Date Analyzed:	03/10/08
Sample ID:	MAIN GAS HDR TO U-2	Analyst:	CR
CAS Lab No.	080652-01	Sample Matrix:	GAS
Date Received:	03/10/08	Date Sampled:	03/10/08
Time Sampled:	12:15 PM	Sample Temp °F:	68

**Natural Gas Analysis
ASTM D1945/ D3588**

Constituent	Mole Percent (%)	Gals/Mft ³	
Oxygen	BQL		
Nitrogen	0.42		
Carbon Dioxide	1.30		
Methane	94.90		
Ethane	2.46		
Propane	0.62		0.171
Iso-Butane	0.09		0.029
n-Butane	0.11		0.035
Neo-Pentane	BQL		BQL
Iso-Pentane	0.03		0.010
n-Pentane	0.02		0.006
Hexane plus	0.018		BQL
Total	100.00	Gals/Mft ³	0.251
Specific Gravity	0.5900		
BTU hhv	1027		
BTU lhv	926		
F-Factor (sdcf/MM btu)	8507		
Compressibility	0.9978		

BQL: Below Practical Quantitation Limit
PQL: Practical Quantitation Limit

AMJAC

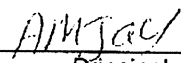
Principal Analyst

Client:	MANDALAY GENERATING STATION	Sample Matrix:	GAS
CAS lab NO. :	080652-01	Date Sampled:	03/10/08
Client ID:	MAIN GAS HDR TO U-2	Date Analyzed	03/11/08

TOTAL REDUCED SULFUR
METHOD GC/PFPD

Constituents	Results Gr/100CF	DF	MDL Gr/100CF
Hydrogen Sulfide	BQL	1	0.05
Carbonyl Sulfide	BQL	1	0.05
Methyl Mercaptan	BQL	1	0.05
Ethyl Mercaptan	BQL	1	0.05
Carbon Disulfide	BQL	1	0.05
Dimethyl Sulfide	BQL	1	0.05
Total Reduced Sulfur	BQL		0.05

DF: DILUTION FACTOR
MDL: METHOD DETECTION LIMIT



 Principal Analyst

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

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Applicable Requirement or Part 70 Permit Condition

<p>Citation, Including Attachment Number and/or Permit Condition Number: Attachment 64.B.2 Conds #1 - #3</p>	<p>Description: Sulfur Content of Liquid Fuel</p>
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

CARB Diesel and Gasoline Purchase Records

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

Only natural gas is burned in Units 1, 2 and the Turbine Peaking Unit. The site uses CARB-approved diesel in the emergency generator and emergency firewater pump. Fuel purchase records are maintained onsite for District review.

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Attachment 68 Conds #1 - #2	Description: Carbon Monoxide
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Emission Calculations Using Approved AP-42 Emission Factors
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2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
- Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

See the attached District analysis to confirm compliance.

**VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT**
Memorandum

TO: Interested Parties

DATE: December 3, 1997

FROM: John Harader

SUBJECT: Rule 68 / AP-42 Emission Factor Comparison

District Rule 68, "Carbon Monoxide", limits stack exhaust from exceeding 2000 ppmv carbon monoxide. The measurements shall be on a dry basis at standard conditions. The rule does not apply to internal combustion engines, jet engine or rocket engine test stands, or rocket propellant or rocket fuel testing devices.

The 2000 ppmv limit can be converted to an emission factor by the following combustion equation:

$$EF = (F)(MW)(20.9/20.9-O_2\%)(\text{lbmole}/387\text{cf})(2000 \text{ ppm}/10^6)(\text{HHV})$$

EF = emission factor (lb CO/ mmcf gas or Mgal oil)

F = "F" factor

= 8,740 dscf/MMBTU for natural gas (40 CFR, Pt. 60, App. A, Meth. 19)

= 9,220 dscf/MMBTU for liquid fuel (40 CFR, Pt. 60, App. A, Meth. 19)

MW = 28 lb CO/ lbmole

HHV = 1,050 MMBTU/mmcf for natural gas

= 141,000 BTU/gallon for fuel oil

Therefore, at an assumed exhaust oxygen content of three percent, the emission factors are:

Natural gas: 1550 lb CO / mmcf

Liquid Fuels: 220 lb CO / Mgal

The EPA AP-42 carbon monoxide Emission Factors, which are used for District Permitted Emissions calculations, are significantly less than the limits imposed by Rule 68. The standard emission factors are:

Natural Gas Fired Units

Rule 68 Factor = 1550 lb CO / mmcf

Boiler > 100 MMBTU/Hr
Boiler 10 - 100 MMBTU/Hr
Boiler < 10 MMBTU/Hr
Turbine

40 lb CO / mmcf
35 lb CO / mmcf
21 lb CO / mmcf
40 lb CO / mmcf

Fuel Oil Fired Units

Rule 68 Factor = 220 lb CO / Mgal

Boiler
Turbine

5 lb CO / Mgal
9 lb CO / Mgal

m:\titlev\rule68ef

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Attachment 74.6 Conds #1 - #12	Description: Surface Cleaning and Degreasing
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Solvent Usage and Activity Records

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

Mandalay only uses cleaning products in nonrefillable aerosol cans. Records are maintained onsite.

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

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Applicable Requirement or Part 70 Permit Condition

<p>Citation, Including Attachment Number and/or Permit Condition Number: Attachment 74.11.1 Conds #1 - #4</p>	<p>Description: Large Water Heaters and Small Boilers</p>
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

<p>Equipment Design Record Review - Not Currently Applicable</p>

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

Only electric water heaters are used at the site and no small boilers exist at the facility, compliance with the requirements is not required.

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Attachment 74.22 Conds #1 - #3	Description: Natural gas Fired Fan-type Central Furnaces
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Equipment Design Record Review - Not Currently Applicable
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2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

No natural gas-fired fan-type central furnaces to which the attachment applies exist at the facility, compliance with the requirements is not required.

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Attachment 74.1 Conds #1 - #7	Description: Abrasive Blasting
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Operating Log Records

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

Bead blast records are available for review at the plant.

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
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Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Attachment 74.2 Conds #1 - #6	Description: Architectural Coatings
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Paint Usage and Activity Records

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
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Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
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Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

Facility maintains records of paints used and VOC content for District review.

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Attachment 74.29 Conds #1 - #11	Description: Soil Decontamination Operations
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Onsite Operations Review - Not Currently Applicable
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2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
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Time Period Covered by Compliance Certification:

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Mandalay Generating Station

No soil remediation is taking place at the Reliant Energy Mandalay Generating Station.

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Attachment 40CFR61.M Conds #1 - #2	Description: Asbestos Standard
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Inspection, Notification, and Contractor Records

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
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Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

Inspection, Notification, and Contractor Records are maintained onsite.

Ventura County Air Pollution Control District
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Applicable Requirement or Part 70 Permit Condition

<p>Citation, Including Attachment Number and/or Permit Condition Number: Attachment Part 70 General Conds #1 - #4</p>	<p>Description: General Part 70 Permit Conditions</p>
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Title V Reports and Periodic Review of Requirements

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
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Ventura County Air Pollution Control District
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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
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Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

Condition 1 - Compliance status of each federally enforceable condition is reviewed.

Condition 2 - Facility strives to comply with all applicable conditions.

Condition 3 - Deviations from Part 70 requirements are reported within 4 hours.

Condition 4 - Facility understands that the need to halt an activity to comply is not a defense against enforcement action.

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Attachment Part 70 General Conds #5 - #8	Description: General Part 70 Permit Conditions
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Title V Reports and Periodic Review of Requirements

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

Condition 5 - All required records, monitoring data, and support information are maintained for a period of 5 years.

Condition 6 - Facility furnishes information to District when requested.

Condition 7 - Facility provides District access to facilities.

Condition 8 - Facility understands that the permit may be modified, revoked, reopened, reissued, or terminated for cause.

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Attachment Part 70 General Conds #9 - #12	Description: General Part 70 Permit Conditions
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Title V Reports and Periodic Review of Requirements

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

Condition 9 - Facility understands that the permit may be reopened by the District under specific conditions.

Condition 10 - Facility strives to pay all fees to maintain the permit active.

Condition 11 - Facility recognizes that the permit does not provide any specific property rights.

Condition 12 - Facility recognizes that the permit is severable.

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
 Applicable Requirement or Part 70 Permit Condition Attachment
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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Attachment Part 70 General Conds #13 - #15	Description: General Part 70 Permit Conditions
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Title V Reports and Periodic Review of Requirements

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 - Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 - Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

Condition 13 - Facility recognizes that an application for permit renewal is required no more than 18 months and no less than 6 months prior to the expiration date.

Condition 14 - Facility recognizes that any document submitted on behalf of this permit must be certified by a responsible official.

Condition 15 - Facility submits a certification of compliance with all applicable requirements to the District and EPA on an annual basis.

Unit 1 RATA (10/18/07) and NH3 slip test reports for Units 1 & 2 submitted without Certification of Truth & Accuracy by R.O. Breakdowns not submitted with Truth & Accuracy by R.O.

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Attachment PO General Conds #1 - #4	Description: General Permit to Operate Conditions
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Periodic Review of Requirements
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2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

Condition 1 - Facility recognizes that petitions to review or revise conditions issued on a permit to operate must be submitted within 30 days of receipt of permit to operate.

Condition 2 - Facility maintains copies of the permit reasonably close to the equipment and readily accessible for District review.

Condition 3 - Facility recognizes that equipment that is not permitted as portable is not transferable from one location to another.

Condition 4 - Facility recognizes that the District may suspend the permit if District is denied access to requested information within a reasonable amount of time.

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
 Applicable Requirement or Part 70 Permit Condition Attachment
 Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Attachment SHIELD - D, Da, Db	Description: Permit Shield - New Source Performance Standards
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Periodic Review of Equipment Modifications and Potentially Applicable Requirements

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 - Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 - Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/07-21-03 Page 2 of 2

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

Facility periodically reviews applicability of identified NSPS subparts

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
 Applicable Requirement or Part 70 Permit Condition Attachment
 Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Attachment SHIELD - GG	Description: Permit Shield - New Source Performance Standards
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Periodic Review of Equipment Modifications and Potentially Applicable Requirements

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 - Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 - Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

Facility periodically reviews applicability of identified NSPS subparts

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Attachment SHIELD - YYYY	Description: Permit Shield - National Emissions Standards for Hazardous Air Pollutants
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Periodic Review of Equipment Modifications and Potentially Applicable Requirements

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
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Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

Facility periodically reviews applicability of identified NSPS subparts

Ventura County Air Pollution Control District
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Applicable Requirement or Part 70 Permit Condition Attachment

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Attachment 40CFR68RMP-13 Conds #1 - #3	Description: Risk Management Plan
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Risk Management Plan Documentation and Review
--

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
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Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

Condition 1 - The site has a current and complete Risk Management Plan.

Condition 2 - The site reviews and updates the Risk Management Plan.

Condition 3 - The site certifies compliance with 40 CFR 68 through submission of Annual Certification.

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Attachment 40CFR72 - 78 - rev191	Description: Acid Rain Program
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Periodic Review of Requirements
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2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
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Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

Facility maintains records to ensure compliance with monitoring, emission limits, recordkeeping, and reporting requirements.

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: 40 CFR Part 82	Description: Protection of Stratospheric Ozone
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Inspection, Notification, and Contractor Records

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
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Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

10 / 01 / 2007 (MM/DD/YY) to 09 / 30 / 2008 (MM/DD/YY)

Mandalay Generating Station

Certified contractors are used to conduct any air conditioning work in the plant.