



7251 Amigo Street, Suite 120

Las Vegas, Nevada 89119

(702) 407-4800

November 13, 2009

Mr. Keith Duval
Ventura County Air Pollution Control District
669 County Square Drive
Ventura, California 93003

**Subject: 2008-09 Annual Compliance Certification
Federal Operating Permit No. 0013
RRI Energy Mandalay**

Dear Mr. Duval:

RRI Energy is submitting the 2008-09 annual compliance certification report for the Mandalay Generating Station. Please find enclosed District forms, including the TVPF-45 Certification by Responsible Official. These documents serve as the annual certification for the period October 1, 2008 to September 30, 2009.

Based on reasonable inquiry, no deviations were found other than those previously reported on monthly monitoring reports. However, further inquiry regarding 10-day asbestos notifications is being conducted. When the results of that investigation are complete, a supplemental report will be filed.

A copy of the report is also being filed with EPA Region IX. If you have any questions or need additional information, please don't hesitate to contact me at 702-407-4861 or bmcquown@rrienergy.com.

Sincerely,

A handwritten signature in black ink that reads "Brian C. McQuown".

Brian C. McQuown
Senior Air Quality Specialist

enclosures

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VENTURA COUNTY
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Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM

Cover Sheet

Form TVPF45/12-24-98 Page 2 of 2

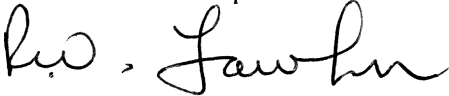
Mr. Gerardo Rios, Chief
Permits Office (AIR-3)
Office of Air Division
EPA Region IX
75 Hawthorne Street
San Francisco, CA 94105

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: Robert W. Lawhn  Title: Environmental Director	Date: 11/16/2009
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Time Period Covered by Compliance Certification:

____10____ / ____01____ / ____08____ (MM/DD/YY) to ____09____ / 30____ / ____09____ (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: 0.002 lb/mmBtu	Limited Emission Rate: 0.10 lb/nmwh 0.02 lb/mmBtu	Specific Source Test or Monitoring Record Citation: RATA Test Test Date: 10/30/08
Emission Unit Description: Mandalay Unit 2		Pollutant: NOx
Measured Emission Rate: 0.006 lb/mmBtu	Limited Emission Rate: 0.10 lb/nmwh 0.02 lb/mmBtu	Specific Source Test or Monitoring Record Citation: RATA Test Test Date: 07/23/09
Emission Unit Description: Mandalay Unit 1		Pollutant: NH 3
Measured Emission Rate: 2.6 ppm	Limited Emission Rate: 10 ppm	Specific Source Test or Monitoring Record Citation: Source test report Test Date: 07/14/09
Emission Unit Description: Mandalay Unit 2		Pollutant: NH 3
Measured Emission Rate: 0.7 ppm	Limited Emission Rate: 10 ppm	Specific Source Test or Monitoring Record Citation: Source test report Test Date 06/30/09
Emission Unit Description: Unit 3 Peaking Turbine		Pollutant:
Measured Emission Rate: 43.21 hrs/yr	Limited Emission Rate: 200 hours/yr	Specific Source Test or Monitoring Record Citation: 74.23 Hourly Logs Test Date: Oct 2008 Sept 2009

MANDALAY UNIT 1

**TABLE 4-1
NO_x LB/MMBTU RELATIVE ACCURACY TEST RESULTS**

Test #	Date	Start Time	RM	CEMS	Difference	Valid Run
1	10/30/2008	10:02	0.003	0.003	0.000	1
2	10/30/2008	10:31	0.003	0.002	0.001	1
3	10/30/2008	11:10	0.002	0.002	0.000	1
4	10/30/2008	11:39	0.002	0.002	0.000	1
5	10/30/2008	12:06	0.002	0.002	0.000	1
6	10/30/2008	12:33	0.002	0.002	0.000	1
7	10/30/2008	13:03	0.002	0.002	0.000	1
8	10/30/2008	13:30	0.002	0.002	0.000	1
9	10/30/2008	13:57	0.003	0.002	0.001	1
Average			0.002	0.002	0.000	
Ref. Method Average:			0.002	lb/MMBtu		
Average Difference:			0.000	lb/MMBtu		
Number of Tests:			9			
Standard Deviation:			0.000	lb/MMBtu		
t Value:			2.303			
Confidence Coefficient:			0.000	lb/MMBtu		
Relative Accuracy:			24.1	%		
Bias Adjustment Factor:			1.000			
Test Condition: 201 net VW						

- (1) Since $d < CC$, the system passes the bias test
- (2) Average difference is less than 0.02 lb/MMBtu - CEMS passes the RATA per the low emitter criteria
- (3) Average difference is less than 0.015 lb/MMBtu - CEMS meets the annual incentive per the low emitter criteria

**TABLE 4-1
NO_x LB/MMBTU RELATIVE ACCURACY TEST RESULTS**

Station: Mandalay
Unit: 2
Date: 7/23/2009

Parameter: NO_x
Units: lb/MMBtu
Performed By: MM, DA

Test #	Date	Start Time	RM	CEMS	Difference	Valid Run
1	7/23/2009	9:44	0.005	0.004	0.001	1
2	7/23/2009	10:05	0.005	0.004	0.001	1
3	7/23/2009	10:26	0.006	0.005	0.001	1
4	7/23/2009	10:56	0.006	0.005	0.001	1
5	7/23/2009	11:17	0.006	0.006	0.000	1
6	7/23/2009	11:38	0.006	0.006	0.000	1
7	7/23/2009	12:05	0.007	0.006	0.001	1
8	7/23/2009	12:26	0.006	0.006	0.000	1
9	7/23/2009	12:47	0.006	0.006	0.000	1
Average			0.006	0.005	0.001	
Ref. Method Average:			0.006	lb/MMBtu		
Average Difference:			0.001	lb/MMBtu		
Number of Tests:			9			
Standard Deviation:			0.001	lb/MMBtu		
t Value:			2.306			
Confidence Coefficient:			0.000	lb/MMBtu		
Relative Accuracy:			16.3	%		
Bias Adjustment Factor:			1.104			
Test Condition:			158 MW			

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 / 2008 (MM/DD/YY) to 09 / 30 / 2009 (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 –RRI Energy is prohibited from burning fuel oil in these units. None was burned during the compliance certification time period.

Condition 1c –RRI 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
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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.”

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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 / 2008 (MM/DD/YY) to 09 / 30 / 2009 (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.”

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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 / 2008 (MM/DD/YY) to 09 / 30 / 2009 (MM/DD/YY)

Mandalay Generating Station

The Annual Ammonia Slip Tests for Units 1 and 2 were conducted on July 14, 2009 and June 30, 2009, respectively. Unit 1 tested at 2.2 ppm. Unit 2 tested at 0.6 ppm. See the attached information for verification.

**TABLE 1-1
AMMONIA SLIP TEST RESULTS
MANDALAY GENERATING STATION UNIT 1
JULY 14, 2009**

Parameter	Units	Test #1	Results Test #3	Test #4	Average
Load	nMW	154	217	158	176
O ₂	%	6.64	5.04	6.54	6.07
NH ₃	ppm	2.3	3.5	0.8	2.2
NH ₃	ppm @ 3% O ₂	2.9	3.9	1.0	2.6
NH ₃	lb/hr	2.1	3.7	0.7	2.1
NH ₃	lb/MMBtu	0.0013	0.0018	0.0005	0.0012
NH ₃	lb/MMSCF	1.38	1.84	0.48	1.24

**TABLE 1-1
AMMONIA SLIP TEST RESULTS
MANDALAY GENERATING STATION UNIT 2
JUNE 30, 2009**

Parameter	Units	Test #1	Results			Average
			Test #2	Test #3		
Load	nMW	100	100	100	100	
O ₂	%	6.52	6.58	6.60	6.57	
NH ₃	ppm	0.8	0.6	0.3	0.6	
NH ₃	ppm @ 3% O ₂	1.0	0.8	0.4	0.7	
NH ₃	lb/hr	0.5	0.4	0.2	0.3	
NH ₃	lb/MMBtu	0.0004	0.0004	0.0002	0.0003	
NH ₃	lb/MMSCF	0.47	0.37	0.21	0.35	

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 #4	Description: Cold Start-up, NOx, 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.”

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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.

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Mandalay Generating Station

There have been 85 Unit 1 start-ups during the compliance period. There have been 100 Unit 2 start-ups during the compliance period. These two units are subject to a 10 hour NOx and NH4 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.

NH4 emissions are tested on an annual basis.

Mandalay Generating Station

Unit name	Year	Month	number of Starts	powergads	cems
Man1	2008	10	20	20	20
Man1	2008	11	10	10	10
Man1	2008	12	2	2	2
Man1	2009	01	2	2	2
Man1	2009	02	0	0	0
Man1	2009	03	4	4	5
Man1	2009	04	4	4	4
Man1	2009	05	13	13	13
Man1	2009	06	1	1	1
Man1	2009	07	14	14	14
Man1	2009	08	4	4	4
Man1	2009	09	10	10	10

84 84 85

Unit name	Year	Month	number of Starts	powergads	cems
Man2	2008	10	22	22	22
Man2	2008	11	15	15	15
Man2	2008	12	3	3	3
Man2	2009	01	5	5	5
Man2	2009	02	12	12	12
Man2	2009	03	3	3	2
Man2	2009	04	2	2	2
Man2	2009	05	12	12	12
Man2	2009	06	4	4	4
Man2	2009	07	14	14	14
Man2	2009	08	4	4	4
Man2	2009	09	5	5	5

101 101 100

Mar-09 Unit 1 26-Mar unit fired up to drain hot
 unit 2 21-Mar unit came back on line to depressurize unit, no fires

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.”

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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:

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Mandalay Generating Station

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

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

Condition 5c - The hourly lb/MW-hr NOx 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.

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 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
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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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10 / 01 / 2008 (MM/DD/YY) to 09 / 30 / 2009 (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
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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Attachment 70N3 - 65 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:

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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 / 2008 (MM/DD/YY) to 09 / 30 / 2009 (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 – RRI 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
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Applicable Requirement or Part 70 Permit Condition

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

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.”

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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 / 2008 (MM/DD/YY) to 09 / 30 / 2009 (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.

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 ATCM Engine N1	Description: Stationary Internal Combustion Engines
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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.

Maintenance and Operating Logs; Fuel 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.”

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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 / 2008 (MM/DD/YY) to 09 / 30 / 2009 (MM/DD/YY)

Mandalay Generating Station

Only CARB Diesel Fuel or approved alternative fuels will be used in Stationary Engine N1 and a monthly operations log will be kept to comply with NFPA 25. Compliance with fuel requirements will be documented through fuel purchase records.

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 ATCM Engine N2	Description: Stationary Internal Combustion Engines
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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.

Maintenance and Operating Logs; Fuel 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.”

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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 / 2008 (MM/DD/YY) to 09 / 30 / 2009 (MM/DD/YY)

Mandalay Generating Station

Only CARB Diesel Fuel or approved alternative fuels will be used in Stationary Engine N2 and a monthly operations log will be kept to comply with NFPA 25. Compliance with fuel requirements will be documented through fuel purchase records.

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 74.23 Conds #1 - #3	Description: Stationary Gas Turbines
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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.

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
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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 / 2008 (MM/DD/YY) to 09 / 30 / 2009 (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.

2008	jan	feb	mar	apr	may	jun	jul	aug	sep	oct	nov	dec
aux power	75.3	75.8	75.9	76.0	76.2	76.3	76.4	76.9	77.0	77.3	77.5	77.6
aux fire	203.7	203.7	203.9	204.0	204.5	206.5	206.8	206.8	207.0	207.3	207.4	207.8
1 pair	3031.3	3032.0	3032.0	3037.6	3056.9	2058.0	3060.8	3067.9	3070.0	3070.3	3071.4	3073.9
2 pair	2920.0	2920.4	2920.4	2925.9	2945.6	2946.8	2949.7	2956.8	2959.0	2959.3	2960.3	2962.8
3 pair	2872.1	2872.8	2872.8	2878.3	2897.8	2898.8	2901.3	2908.2	2910.4	2910.7	2911.6	2914.0
4 pair	3090.2	3090.8	3090.8	3095.9	3115.6	3116.8	3119.5	3126.6	3128.4	3128.7	3129.7	3132.2
total peaker	5472.5	5475.3	5475.3	5483.4	5504.8	5506.4	5511.1	5518.9	5522.0	5522.7	5524.5	5527.8
gasoline	8091.9	8166.1	8279.6	8394.6	8523.3	8642.8	875.9	8850.1	8868.3	9010.7	9160.3	9256.9
diesel	2806.5	2847.4	2878.7	2990.2	3649.3	4067.3	4124.9	4165.1	4208.0	4273.0	4273.0	4273.0
2009	jan	feb	mar	apr	may	jun	jul	aug	sep	oct	nov	dec
aux power	77.7	77.8	77.9	78.2	78.3	79.0	79.2	79.4	79.5	79.6	79.6	
aux fire	207.8	208.0	208.1	208.2	208.4	208.5	208.7	208.9	209.0	209.2	209.3	
1 pair	3078.3	3078.3	3079.4	3083.6	3091.3	3092.7	3093.5	3093.8	3099.3	3122.0	3138.7	
2 pair	2965.0	2965.0	2965.7	2969.0	2971.0	2972.8	2973.8	2974.1	2979.7	2997.5	3014.2	
3 pair	2916.1	2916.1	2917.2	2920.8	2926.7	2928.0	2928.9	2929.1	2934.4	2956.8	2973.6	
4 pair	3135.0	3135.0	3135.9	3140.1	3146.2	3147.5	3148.7	3149.0	3154.6	3177.2	3193.6	
total peaker	5536.5	5536.5	5538.8	5544.2	5554.7	5562.0	5564.6	5565.3	5571.7	5597.5	5615.9	
gasoline	9422.6	9539.5	9741.1	9912.8	9990.8	10057.8	10164.6	10208.3	10295.3	10379.5	10466.9	
diesel	4318.2	4318.2	4371.4	4558.5	4738.1	4770.0	4770.0	4780.3	4904.2	4904.2	4935.3	

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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.”

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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 / 2008 (MM/DD/YY) to 09 / 30 / 2009 (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 12 breakdowns that are subject to 103N2.

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.

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: PO00013PC1 Conds #1 - #2	Description: General Requirements 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.”

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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 / 2008 (MM/DD/YY) to 09 / 30 / 2009 (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.

Condition 2 - Mandalay only uses cleaning products in nonrefillable aerosol cans. Records are maintained onsite.

**RRI Energy Mandalay Generating Station
Monthly and Rolling 12-Month Emissions Totals
2007-2009**

Natural Gas Fuel Throughput					
Month	Gas (HCF)		Rolling 12 Month Total (MMCF)*	Gas (MCF)	Rolling 12 Month Total (MMCF)**
	Unit 1	Unit 2		Unit 3	
2007 Oct	2,768,432.5	4,027,901.0		3,813.0	
2007 Nov	177,223.5	385,257.0		356.0	
2007 Dec	636,138.1	1,716,005.8		6.0	
2008 Jan	1,395,191.8	2,871,089.8		251.0	
2008 Feb	2,887.1	984,117.5		4.0	
2008 Mar	211,560.2	976,548.3		5,983.0	
2008 Apr	0.0	2,881,142.5		15,188.0	
2008 May	767,610.0	1,983,337.0		703.0	
2008 Jun	1,912,245.8	2,556,165.5		2,853.0	
2008 Jul	2,270,826.8	3,816,150.8		4,579.0	
2008 Aug	3,399,237.8	4,929,460.0		1,664.0	
2008 Sep	3,275,349.8	3,749,139.5	4,769	134.0	35.5
2008 Oct	4,834,021.9	5,578,581.3	5,131	787.0	32.5
2008 Nov	3,941,414.0	4,550,351.3	5,924	3,707.0	35.9
2008 Dec	1,214,956.1	1,666,716.6	5,977	2,310.0	38.2
2009 Jan	2,279,093.9	2,382,118.0	6,016	16.0	37.9
2009 Feb	0.0	1,795,588.1	6,097	910.0	38.8
2009 Mar	2,181,710.8	2,218,117.5	6,418	5,473.0	38.3
2009 Apr	1,460,585.8	1,012,581.2	6,378	4,094.0	27.2
2009 May	1,466,418.0	1,309,936.9	6,380	876.0	27.4
2009 Jun	55,671.3	366,300.5	5,975	529.0	25.1
2009 Jul	2,641,096.3	1,832,993.0	5,814	123.0	20.6
2009 Aug	545,164.2	531,447.5	5,089	9,827.0	28.8
2009 Sep	2,646,380.3	2,000,009.4	4,851	37,347.0	66.0

* Limitation 33,204.6 MMCF/yr Natural Gas Throughput

** Limitation 197.58 MMCF/yr Natural Gas Throughput

**RRI Energy Mandalay Generating Station
Monthly and Rolling 12-Month Diesel Engine Operation Totals
2007-2009**

Diesel Fired Emergency Engine Operating Time						
Month	154 HP Perkins engine (fire pump)		Rolling 12 Month Total (hours)	201 HP Generac engine (emergency generator)		Rolling 12 Month Total (hours)*
	1st of Month Meter Reading	Hours		1st of Month Meter Reading	Hours	
2007 Oct	203.4	0.1		74.7	0.4	
2007 Nov	203.5	0.1		75.1	0.2	
2007 Dec	203.6	0.1		75.3	0.0	
2008 Jan	203.7	0.0		75.3	0.5	
2008 Feb	203.7	0.2		75.8	0.1	
2008 Mar	203.9	0.1		75.9	0.1	
2008 Apr	204.0	0.5		76.0	0.2	
2008 May	204.5	2.0		76.2	0.1	
2008 Jun	206.5	0.3		76.3	0.1	
2008 Jul	206.8	0.0		76.4	0.5	
2008 Aug	206.8	0.2		76.9	0.1	
2008 Sep	207.0	0.3		77.0	0.3	
2008 Oct	207.3	0.1	3.9	77.3	0.2	2.4
2008 Nov	207.4	0.4	4.2	77.5	0.1	2.3
2008 Dec	207.8	0.0	4.1	77.6	0.1	2.4
2009 Jan	207.8	0.2	4.3	77.7	0.1	2.0
2009 Feb	208.0	0.1	4.2	77.8	0.1	2.0
2009 Mar	208.1	0.1	4.2	77.9	0.3	2.2
2009 Apr	208.2	0.2	3.9	78.2	0.1	2.1
2009 May	208.4	0.1	2.0	78.3	0.7	2.7
2009 Jun	208.5	0.2	1.9	79.0	0.2	2.8
2009 Jul	208.7	0.2	2.1	79.2	0.2	2.5
2009 Aug	208.9	0.1	2.0	79.4	0.1	2.5
2009 Sep	209.0	0.2	1.9	79.5	0.1	2.3
2009 Oct	209.2			79.6		

* Limitation 20 hours/yr Usage

**RRI Energy Mandalay Generating Station
Monthly and Rolling 12-Month Gasoline Usage Totals
2007-2009**

Gasoline Throughput			
Month	1,000 Gallon AST		Rolling 12 Month Total (gallons)*
	1st of Month Meter Reading	Usage Volume (gallons)	
2007 Oct	7,594.4	136.5	
2007 Nov	7,730.9	247.1	
2007 Dec	7,978.0	113.9	
2008 Jan	8,091.9	74.2	
2008 Feb	8,166.1	113.5	
2008 Mar	8,279.6	115.0	
2008 Apr	8,394.6	128.7	
2008 May	8,523.3	119.5	
2008 Jun	8,642.8	114.1	
2008 Jul	8,756.9	93.2	
2008 Aug	8,850.1	18.2	
2008 Sep	8,868.3	142.4	
2008 Oct	9,010.7	149.6	1,429
2008 Nov	9,160.3	96.6	1,279
2008 Dec	9,256.9	165.7	1,331
2009 Jan	9,422.6	116.9	1,373
2009 Feb	9,539.5	201.6	1,462
2009 Mar	9,741.1	171.7	1,518
2009 Apr	9,912.8	78.0	1,468
2009 May	9,990.8	67.0	1,415
2009 Jun	10,057.8	106.8	1,408
2009 Jul	10,164.6	43.7	1,358
2009 Aug	10,208.3	87.0	1,427
2009 Sep	10,295.3	84.2	1,369
2009 Oct	10,379.5		

* Limitation 7,500 gallons/yr Usage

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: PO00013PC2 Conds #1 - #2	Description: Natural Gas Combustion Only Requirements
--------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------

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 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 / 2008 (MM/DD/YY) to 09 / 30 / 2009 (MM/DD/YY)

Mandalay Generating Station

Condition 1, 2 – Only natural gas is fired in Units 1 and 2 and the Turbine Peaking Unit.

RRI Energy Mandalay Generating Station Monthly and Rolling 12-Month Emissions Totals 2007-2009

Month	Natural Gas Total Monthly Throughput (MMCF)	Units 1 & 2 Monthly Emissions Output Totals						Units 1 & 2 Rolling 12 Month Emissions Output Totals						
		APCD REPORTABLE EMISSIONS (tons)						APCD REPORTABLE EMISSIONS (tons)						
		Units 1 & 2	ROC	PM	SOx	CO	NH ₃	NOx	ROC	PM	SOx	CO	NH ₃	NOx
2007, Oct	679.6	1.87	2.58	0.20	28.54	1.60	1.18							
2007, Nov	56.2	0.15	0.21	0.02	2.36	0.13	0.13							
2007, Dec	235.2	0.65	0.89	0.07	9.88	0.55	0.58							
2008, Jan	426.6	1.17	1.62	0.13	17.92	1.00	0.63							
2008, Feb	98.7	0.27	0.38	0.03	4.15	0.23	0.26							
2008, Mar	118.8	0.33	0.45	0.04	4.99	0.28	0.19							
2008, Apr	288.1	0.79	1.09	0.09	12.10	0.68	0.80							
2008, May	275.1	0.76	1.05	0.08	11.55	0.65	0.64							
2008, Jun	446.8	1.23	1.70	0.13	18.77	1.05	1.04							
2008, Jul	608.7	1.67	2.31	0.18	25.57	1.43	1.02							
2008, Aug	832.9	2.29	3.16	0.25	34.98	1.96	1.43							
2008, Sep	702.4	1.93	2.67	0.21	29.50	1.65	1.25	13.12	18.12	1.43	200.31	11.21	9.15	
2008, Oct	1,041.3	2.86	3.96	0.31	43.73	2.45	1.90	14.11	19.50	1.54	215.50	12.06	9.86	
2008, Nov	849.2	2.34	3.23	0.25	35.67	2.00	1.37	16.29	22.51	1.78	248.80	13.92	11.10	
2008, Dec	288.2	0.79	1.10	0.09	12.10	0.68	0.55	16.44	22.71	1.79	251.03	14.05	11.07	
2009, Jan	466.1	1.28	1.77	0.14	19.58	1.10	0.47	16.54	22.86	1.80	252.68	14.14	10.91	
2009, Feb	179.6	0.49	0.68	0.05	7.54	0.42	0.16	16.77	23.17	1.83	256.08	14.33	10.82	
2009, Mar	440.0	1.21	1.67	0.13	18.48	1.03	0.58	17.65	24.39	1.93	269.57	15.08	11.21	
2009, Apr	247.3	0.68	0.94	0.07	10.39	0.58	0.19	17.54	24.23	1.91	267.86	14.99	10.60	
2009, May	277.6	0.76	1.06	0.08	11.66	0.65	0.40	17.55	24.24	1.91	267.96	14.99	10.36	
2009, Jun	42.2	0.12	0.16	0.01	1.77	0.10	0.12	16.43	22.71	1.79	250.97	14.04	9.44	
2009, Jul	447.4	1.23	1.70	0.13	18.79	1.05	0.57	15.99	22.09	1.74	244.19	13.66	8.99	
2009, Aug	107.7	0.30	0.41	0.03	4.52	0.25	0.11	13.99	19.34	1.53	213.74	11.96	7.66	
2009, Sep	464.6	1.28	1.77	0.14	19.51	1.09	0.63	13.34	18.43	1.46	203.75	11.40	7.04	
		12 MONTH APCD LIMITS (tons)						Units 1 & 2	23.24	41.51	9.96	664.09	78.03	176.98

Emission factors (lb/10⁶ scf) for ROC, PM, SOx, and CO obtained from AP-42 Tables 1.4-1 and 1.4-2 (7/98). Emission Factor for NH₃ is from Rule 59

**RRI Energy Mandalay Generating Station
Monthly and Rolling 12-Month Emissions Totals
2007-2009**

Month	Natural Gas Total Monthly Throughput (MMCF)	Unit 3 Monthly Emissions Output Totals					Unit 3 Rolling 12 Month Emissions Output Totals					
		APCD REPORTABLE EMISSIONS (tons)					APCD REPORTABLE EMISSIONS (tons)					
		Unit 3	ROC	PM	SOx	CO	NOx	ROC	PM	SOx	CO	NOx
2007, Oct	3.8	0.00	0.01	0.00	0.81	0.60						
2007, Nov	0.4	0.00	0.00	0.00	0.08	0.06						
2007, Dec	0.0	0.00	0.00	0.00	0.00	0.00						
2008, Jan	0.3	0.00	0.00	0.00	0.05	0.04						
2008, Feb	0.0	0.00	0.00	0.00	0.00	0.00						
2008, Mar	6.0	0.01	0.02	0.00	1.27	0.95						
2008, Apr	15.2	0.02	0.05	0.00	3.22	2.41						
2008, May	0.7	0.00	0.00	0.00	0.15	0.11						
2008, Jun	2.9	0.00	0.01	0.00	0.60	0.45						
2008, Jul	4.6	0.01	0.02	0.00	0.97	0.73						
2008, Aug	1.7	0.00	0.01	0.00	0.35	0.26						
2008, Sep	0.1	0.00	0.00	0.00	0.03	0.02	0.04	0.12	0.01	7.53	5.63	
2008, Oct	0.8	0.00	0.00	0.00	0.17	0.12	0.04	0.11	0.01	6.89	5.16	
2008, Nov	3.7	0.00	0.01	0.00	0.79	0.59	0.04	0.12	0.01	7.60	5.69	
2008, Dec	2.3	0.00	0.01	0.00	0.49	0.37	0.04	0.13	0.01	8.09	6.05	
2009, Jan	0.0	0.00	0.00	0.00	0.00	0.00	0.04	0.13	0.01	8.04	6.01	
2009, Feb	0.9	0.00	0.00	0.00	0.19	0.14	0.04	0.13	0.01	8.23	6.16	
2009, Mar	5.5	0.01	0.02	0.00	1.16	0.87	0.04	0.13	0.01	8.12	6.08	
2009, Apr	4.1	0.00	0.01	0.00	0.87	0.65	0.03	0.09	0.01	5.77	4.32	
2009, May	0.9	0.00	0.00	0.00	0.19	0.14	0.03	0.09	0.01	5.81	4.35	
2009, Jun	0.5	0.00	0.00	0.00	0.11	0.08	0.03	0.09	0.01	5.31	3.98	
2009, Jul	0.1	0.00	0.00	0.00	0.03	0.02	0.02	0.07	0.01	4.37	3.27	
2009, Aug	9.8	0.01	0.03	0.00	2.08	1.56	0.03	0.10	0.01	6.10	4.56	
2009, Sep	37.3	0.04	0.13	0.01	7.91	5.92	0.07	0.23	0.02	13.98	10.47	
		12 MONTH APCD LIMITS (tons)			Unit 3	0.75	2.01	0.06	11.41	45.64		

Emission factors (lb/10⁶ scf) for NOx, ROC, PM, SOx, and CO obtained from 2/28/01 ATC Table 6-3

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
-----------------------------------------------------------------------------------------------------------------------	------------------------------------------------

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.”

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 / 2008 (MM/DD/YY) to 09 / 30 / 2009 (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

2009 MANDALAY UNIT 1
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: January 23, 2009


Authorized Signature

July 24, 2008

Course date

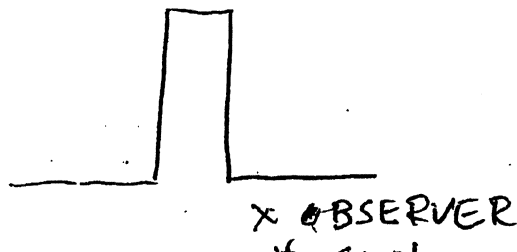
Certified for: 100.1 Average Dev. White Black
100.1 = day, 100.2 = night Sun glasses: 3.4 White 2.6 Black

RECORD OF VISIBLE EMISSIONS

Client/Location MANDALAY UNIT 1 Date 1/12/09
 Unit 1 Fuel NAT. GAS Test No. 1 Observer M. ESCARCEGA
 Weather Conditions CLEAR 10-15 MPH WINDS
 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											
	01											
	02					11	31	0	0	0	0	
	03						32	0	0	0	0	
	04						33	0	0	0	0	
	05						34	0	0	0	0	
	06						35	0	0	0	0	
	07						36	0	0	0	0	
	08						37					
	09						38					
	10						39					
	11						40					
	12						41					
	13						42					
	14						43					
	15						44					
	16						45					
	17						46					
	18						47					
	19						48					
	20						49					
	21						50					
	22						51					
	23						52					
	24						53					
	25						54					
	26						55					
	27						56					
	28						57					
	29						58					
							59					

Comments/Notes: STACK HEIGHT = 200 FT
UNIT LOAD X 50 NMW
READINGS FROM 500 FT AWAY



2009 MANDALAY UNIT 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, Michael

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 16, 2009


Authorized Signature

January 14, 2009

Course date

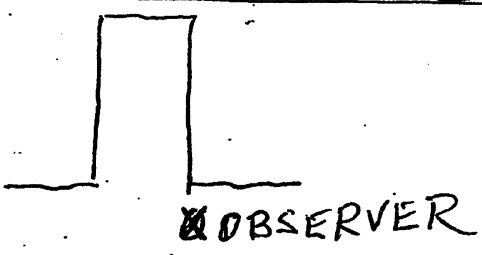
Certified for: 100.1 Average Dev. White Black
100.1 = day, 100.2 = night Sun glasses: 3.4 White 2.2 Black

RECORD OF VISIBLE EMISSIONS

Client/Location MANDALAY UNIT 2 Date 2/18/09
 Unit 2 Fuel NAT. GAS Test No. 1 Observer M. ESCARCEGA
 Weather Conditions CLEAR 5-10 MPH WINDS
 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				
	07							37				
	08							38				
	09							39				
	10							40				
	11							41				
	12							42				
	13							43				
	14							44				
	15							45				
	16							46				
12	17	0	0	0	0			47				
	18	0	0	0	0			48				
	19	0	0	0	0			49				
	20	0	0	0	0			50				
	21	0	0	0	0			51				
	22	0	0	0	0			52				
	23							53				
	24							54				
	25							55				
	26							56				
	27							57				
	28							58				
	29							59				

Comments/Notes: STACK HEIGHT = 200 FT
UNIT LOAD ≈ 50 MMW
READINGS FROM 500 FT. AWAY → WIND



2009 MANDALAY PEAKER
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, Michael

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 14, 2010


Authorized Signature

July 15, 2009
Course date

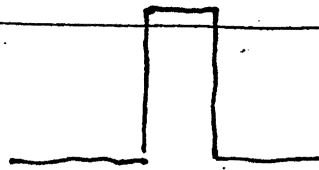
Certified for: 100.1 Average Dev. White Black
100.1 = day, 100.2 = night Sun glasses: 4.8 White 4.4 Black

RECORD OF VISIBLE EMISSIONS

Client/Location MANDALAY UNIT 3 Date 9/21/09
 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											
	01							30				
	02							31				
	03							32				
	04							33				
	05							34				
	06						08	35	0	0	0	5
	07							36	0	0	0	0
	08							37	5	0	0	0
	09							38	0	0	0	0
	10							39	5	0	0	5
	11							40	0	0	0	0
	12							41	0	0	5	0
	13							42	0	0	0	5
	14							43				
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	16							45				
	17							46				
	18							47				
	19							48				
	20							49				
	21							50				
	22							51				
	23							52				
	24							53				
	25							54				
	26							55				
	27							56				
	28							57				
	29							58				
								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 9/21/09

Unit 3#4 PAIR Fuel NAT. GAS Test No. 1 Observer M. ESCARCEGA

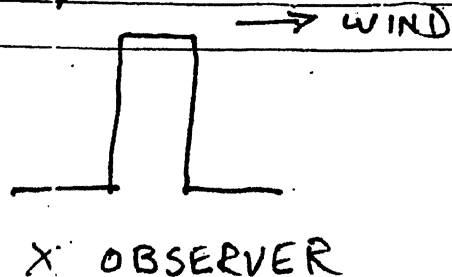
Weather Conditions CLOUDY - NO SUN WIND 0-5 MPH

Observer's Location SEE SKETCH BELOW

Time					Comments	Time					Comments	
Hr	Min	Seconds				Hr	Min	Seconds				
		00	15	30	45			00	15	30	45	
	00											
	01											
	02											
	03											
	04											
	05											
	06					08	35	0	5	0	0	
	07						36	5	0	5	0	
	08						37	5	0	0	0	
	09						38	5	5	0	5	
	10						39	5	0	0	5	
	11						40	0	5	0	0	
	12						41	0	0	5	0	
	13						42	5	0	5	0	
	14						43	0	0	5	0	
	15						44	0	0	0	0	
	16						45	0	0	0	5	
	17						46	5	0	5	0	
	18						47	0	0	0	5	
	19						48					
	20						49					
	21						50					
	22						51					
	23						52					
	24						53					
	25						54					
	26						55					
	27						56					
	28						57					
	29						58					
							59					

Comments/Notes: STACK HEIGHT = 50 FT AWAY

READINGS FROM 150 FT. AWAY



2009 MANDALAY 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, Michael

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 16, 2009


Authorized Signature

January 14, 2009

Course date

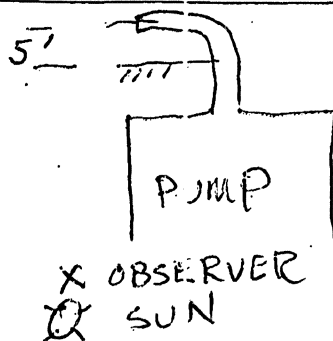
Certified for: 100.1 Average Dev. White Black
100.1 = day, 100.2 = night Sun glasses: 3.4 White 2.2 Black

RECORD OF VISIBLE EMISSIONS

Client/Location MANDALAY SALT FIREWATER PUMP Date 6/10/09
 Unit _____ Fuel DIESEL Test No. 1 Observer M. ESCARLEGA
 Weather Conditions DTLY. 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
10	00	5	10	10	10			30			
	01	5	10	5	10			31			
	02							32			
	03							33			
	04							34			
	05							35			
	06							36			
	07							37			
	08							38			
	09							39			
	10							40			
	11							41			
	12							42			
	13							43			
	14							44			
	15							45			
	16							46			
	17							47			
	18							48			
	19							49			
	20							50			
	21							51			
	22							52			
	23							53			
	24							54			
	25							55			
	26					09	56	5	5	5	10
	27						57	5	10	5	5
	28						58	10	5	5	10
	29						59	5	10	5	5

Comments/Notes: STACK HEIGHT = ~ 5 FT.
READINGS FROM ~ 20 FT AWAY.

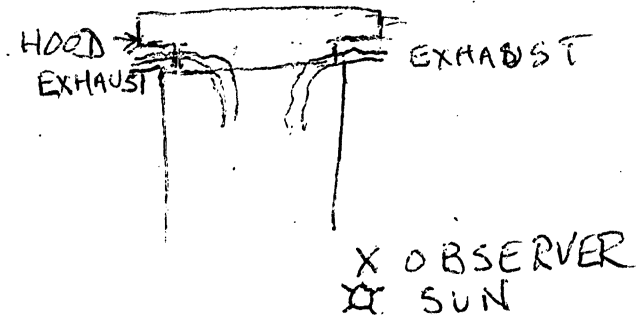


RECORD OF VISIBLE EMISSIONS

Client/Location MANDALAY HEAD BLASTER Date 6/18/09
 Unit _____ Fuel N/A Test No. 1 Observer M. ESCARCEGA
 Weather Conditions PTLY. CLOUDY WIND 0-10 MPH
 Observer's Location SEE SKETCH BELOW

Time					Comments	Time					Comments	
Hr	Min	Seconds				Hr	Min	Seconds				
		00	15	30		45			00	15		30
	00											
	01											
	02											
	03											
	04											
	05											
	06											
	07											
	08											
	09											
	10											
	11											
	12					109	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	0	0	0	0	
	17						46	0	0	0	0	
	18						47					
	19						48					
	20						49					
	21						50					
	22						51					
	23						52					
	24						53					
	25						54					
	26						55					
	27						56					
	28						57					
	29						58					
							59					

Comments/Notes: STACK HEIGHT = 8 FT.
READINGS FROM ~15 FT.



RECORD OF VISIBLE EMISSIONS

Client/Location MANDALAY DIESEL AUX. ELEC. GEN. Date 6/10/09

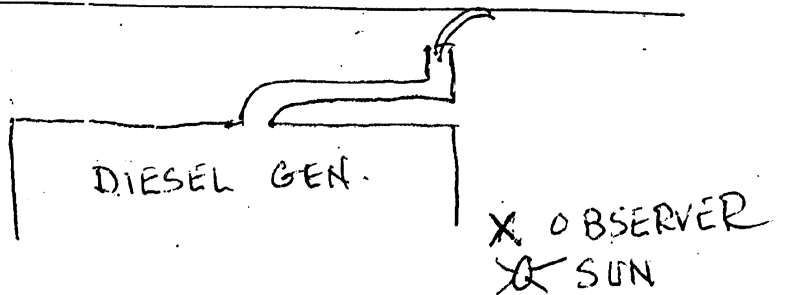
Unit _____ Fuel DIESEL Test No. 1 Observer M. ESCARLEGA

Weather Conditions PTLY. CLOUDY 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											
	01											
	02					09	32	0	0	0	5	
	03						33	0	0	0	0	
	04						34	0	5	0	0	
	05						35	0	0	0	0	
	06						36	5	0	5	0	
	07						37	0	0	0	0	
	08						38					
	09						39					
	10						40					
	11						41					
	12						42					
	13						43					
	14						44					
	15						45					
	16						46					
	17						47					
	18						48					
	19						49					
	20						50					
	21						51					
	22						52					
	23						53					
	24						54					
	25						55					
	26						56					
	27						57					
	28						58					
	29						59					

Comments/Notes: STACK HEIGHT = 10-FT.
READINGS FROM ≈ 30 FT. AWAY.



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 52 Conds #1 - #2	Description: Particulate Matter Concentration (Grain Loading)
-----------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------

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

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 / 2008 (MM/DD/YY) to 09 / 30 / 2009 (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: $MMBTU/Hr = (DCFM)(1/F\text{-factor})(60min/hr)(20.9\%O_2/20.9)$
 $lb/mmcf = (Gr/DSCF)(lb/7000Gr)(F\text{-factor})(HHV)(20.9/20.9\%O_2)$

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

Rule 52 DCFM Exhaust	Equivalent Fuel Input MMBTU/Hr	Rule 52 Emission limit		AP-42 Emission Factors	
		Gr/DCF	converted to lb/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	
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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 / 2008 (MM/DD/YY) to 09 / 30 / 2009 (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
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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.

<p>Modeling Demonstration</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 / 2008 (MM/DD/YY) to 09 / 30 / 2009 (MM/DD/YY)

Mandalay Generating Station

Units 1, 2, and 3 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.

To: Keith

From: Kerby Z.

RE: 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,

Tks,
Kerby Z.

**VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT**
Memorandum

TO: Karl Krause

DATE: May 23, 1996

FROM: Terri Thomas *ll*

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
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Applicable Requirement or Part 70 Permit Condition

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

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 / 2008 (MM/DD/YY) to 09 / 30 / 2009 (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:\title\rule57.Bcomp

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 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	
-----------------------------	--

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 / 2008 (MM/DD/YY) to 09 / 30 / 2009 (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 July 24, 2009
393 North Harbor Blvd.
Oxnard, CA 93035

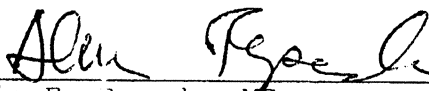
ATTENTION: Bohdan Jan Siekiel-Zdzienicki

Laboratory No: 091765 Sampled By: Client
Date Received: 13-JUL-09 ID: See Below
Project: Annual Natural Gas Sample

RESULTS

On July 13, 2009, 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 9 pages excluding the cover letter and the Chain of Custody.

<u>SAMPLE DESCRIPTION</u>	<u>CAS LAB NUMBER</u>
MAIN GAS HDR TO UNIT 1	09176501


Alin E. Repede, MS
Director - Analytical Operations

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

Client:	MANDALAY GEN. STATION	Sample Matrix:	GAS
CAS Lab No.:	091765-01	Date Sampled:	07/13/09
Client ID:	Main Gas HDR To Unit 1	Date Analyzed:	07/14/09

TOTAL REDUCED SULFUR

METHOD GC/PFPD

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

DF: DILUTION FACTOR
MDL: METHOD DETECTION LIMIT
ND: NOT DETECTED

Amjay
Lab. Supervisor

Park
Principal Analyst



Analytical Services, Inc

Client:	Mandalay Generating Station	Date Analyzed:	07/13/09
Sample ID:	Main Gas HDR To Unit-1	Analyst:	AJ
CAS Lab No.	091765-01	Sample Matrix:	GAS
Date Received:	07/13/09	Date Sampled:	07/13/09
Time Sampled:	2:09 PM	Sample Temp °F:	68

NATURAL GAS ANALYSIS
ASTM D1945 / D3588

Constituent	% Mole	Gals/Mft ³
Oxygen	0.43	
Nitrogen	BQL	
Carbon Dioxide	1.52	
Methane	92.61	
Ethane	3.86	
Propane	1.16	
Iso-Butane	0.12	0.319
n-Butane	0.20	0.040
Neo-Pentane	BQL	0.063
Iso-Pentane	0.04	BQL
n-Pentane	0.02	0.013
Hexane plus	0.030	0.009
		0.012
Total	100.00	0.458
Specific Gravity	0.6066	
BTU hhv	1047	
BTU lhv	945	
F-Factor (sdci/MM btu)	8516	
Compressibility	0.9977	

BQL: Below Practical Quantitation Limit

AMJA
Lab Supervisor

Paul F.
Principal Analyst

RRI
~~RE~~ ENERGY

Chain of Custody Record

091765

DATE 7/13/09 PAGE 1 OF 1

ADDRESS		PROJECT		LOCATION		PARAMETERS										OTHER		OBSERVATIONS/ COMMENTS	
SAMPLE NO	DATE	TIME	SAMPLERS (SIGNATURE)	DATE	TIME	CAM METALS (16)	PR. POLLUTANT METALS (13)	GENERAL MINERALS	OIL & GREASE	PETROLEUM HYDROCARBONS	BASES/NEUTRALIZABLE ACIDS (ORGANICS)	PESTICIDES	VOLATILE ORGANICS (SOT/602)	VOLATILE ORGANICS (624)	TOC/TOX	NUMBER OF CONTAINERS	TOTAL NUMBER OF CONTAINERS	METHOD OF SHIPMENT	SPECIAL SHIPMENT/HANDLING OR STORAGE REQUIREMENTS
1	7/13/09		Michael J. Escarcega	1409 MAIN GAS HDB.												ANALYZE FOR:			
				To UNIT 1												TOTAL SULFUR IN GRAINS/100 SUE			
																ULTIMATE ANALYSIS FOR:			
																BTU/SCF			
																% METHANE			
																% ETHANE			
																ETC.			
NOTES: SEND RESULTS TO		ALPHIE SIKIEL-ZIENICKI		BOHDAN															
		RRI MANDALAY G.S.																	
		393 N. HARBOUR BLVD.																	
		DUNNARD, CA 93035																	
		PH: (805) 984-5225																	
QUESTIONS CONTACT		MIKE ESCARCEGA @ (909) 772-5617																	
RELINQUISHED BY	DATE	TIME	SIGNATURE	RECEIVED BY	DATE	TIME	SIGNATURE	RELINQUISHED BY	DATE	TIME	SIGNATURE	RECEIVED BY	DATE	TIME	SIGNATURE	RELINQUISHED BY	DATE	TIME	SIGNATURE
M. Escarcega	7/13	09	MIKE ESCARCEGA	MIKE ESCARCEGA	7/13	09	MIKE ESCARCEGA	MIKE ESCARCEGA	7/13	09	MIKE ESCARCEGA	MIKE ESCARCEGA	7/13	09	MIKE ESCARCEGA	MIKE ESCARCEGA	7/13	09	MIKE ESCARCEGA
M. Escarcega	7/13	09	MIKE ESCARCEGA	MIKE ESCARCEGA	7/13	09	MIKE ESCARCEGA	MIKE ESCARCEGA	7/13	09	MIKE ESCARCEGA	MIKE ESCARCEGA	7/13	09	MIKE ESCARCEGA	MIKE ESCARCEGA	7/13	09	MIKE ESCARCEGA
RELINQUISHED BY	DATE	TIME	SIGNATURE	RECEIVED BY	DATE	TIME	SIGNATURE	RELINQUISHED BY	DATE	TIME	SIGNATURE	RECEIVED BY	DATE	TIME	SIGNATURE	RELINQUISHED BY	DATE	TIME	SIGNATURE
M. Escarcega	7/13	09	MIKE ESCARCEGA	MIKE ESCARCEGA	7/13	09	MIKE ESCARCEGA	MIKE ESCARCEGA	7/13	09	MIKE ESCARCEGA	MIKE ESCARCEGA	7/13	09	MIKE ESCARCEGA	MIKE ESCARCEGA	7/13	09	MIKE ESCARCEGA

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

Citation, Including Attachment Number and/or Permit Condition Number: Attachment 64.B.2 Conds #1 - #3	Description: Sulfur Content of Liquid Fuel
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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
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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 / 2008 (MM/DD/YY) to 09 / 30 / 2009 (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
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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Attachment 68 Conds #1 - #2	Description: Carbon Monoxide
-----------------------------------------------------------------------------------------------------------------------	----------------------------------------

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

- 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

- Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
- 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
- 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.”
- 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 / 2008 (MM/DD/YY) to 09 / 30 / 2009 (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
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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.”

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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:

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Mandalay Generating Station

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

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Attachment 74.11.1 Conds #1 - #4	Description: Large Water Heaters and Small Boilers
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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

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.”

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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:

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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.

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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

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.”

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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.

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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
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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.”

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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:

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Mandalay Generating Station

Bead blast records are available for review at the plant.

Ventura County Air Pollution Control District
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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.”

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.”

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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:

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Mandalay Generating Station

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

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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

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.”

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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.

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Mandalay Generating Station

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

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

Citation, Including Attachment Number and/or Permit Condition Number: 40 CFR Part 61, Sub Part 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.”

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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:

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Mandalay Generating Station

Inspection, Notification, and Contractor Records are maintained onsite. RRI is currently reviewing renovation records for accuracy. When the review is complete, a supplement to this certification report will be filed as soon as possible.

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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 #1 - #4	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.”

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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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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
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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.”

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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.

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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
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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.”

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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.

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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
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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.

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.”

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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 / 2008 (MM/DD/YY) to 09 / 30 / 2009 (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.

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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

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.”

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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 / 2008 (MM/DD/YY) to 09 / 30 / 2009 (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.

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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.”

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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 / 2008 (MM/DD/YY) to 09 / 30 / 2009 (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 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.”

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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 / 2008 (MM/DD/YY) to 09 / 30 / 2009 (MM/DD/YY)

Mandalay Generating Station

Facility periodically reviews applicability of identified NSPS subparts

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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.”

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 / 2008 (MM/DD/YY) to 09 / 30 / 2009 (MM/DD/YY)

Mandalay Generating Station

Facility periodically reviews applicability of identified NSPS subparts

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: 40 CFR Part 68	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.”

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.”

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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 / 2008 (MM/DD/YY) to 09 / 30 / 2009 (MM/DD/YY)

Mandalay Generating Station

The site has a current and complete Risk Management Plan.

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

Citation, Including Attachment Number and/or Permit Condition Number: Attachment 40 CFR Part 72 - 78 - rev191 Conds #1 - #3	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.

<p>Periodic Review of Requirements</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.”

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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:

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Mandalay Generating Station

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

Ventura County Air Pollution Control District
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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.”
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.”

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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:

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Mandalay Generating Station

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