



Ventura County
Air Pollution
Control District

**ANNUAL COMPLIANCE CERTIFICATION
SIGNATURE COVER FORM**

A copy of each Annual Compliance Certification shall be submitted to EPA, Region 9, at the following address:

Mr. Gerardo Rios, Chief
Permits Office (AIR-3)
Office of Air Division
EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105

RECEIVED
VENTURA COUNTY
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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.

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| Signature and Title of Responsible Official: Robert W. Lawhn | Date: 11/05/2010 |
| | |
| Title: Director, Environmental Compliance | |

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| Time Period Covered by Compliance Certification |
| <u>10</u> / <u>01</u> / <u>2009</u> (MM/DD/YY) to <u>09</u> / <u>30</u> / <u>2010</u> (MM/DD/YY) |
| RRI Energy West, Inc, Mandalay Generating Station |



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION

SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 10 / 01 / 2009 (MM/DD/YY) to 09 / 30 / 2010 (MM/DD/YY)

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|-----------------------------------------------|----------------------------------------------------------------|-------------------------------------------------------------------------------------------|-----------------------------|
| A. Emission Unit Description: Mandalay Unit 1 | | | B. Pollutant: NOx |
| C. Measured Emission Rate: 0.006 lb/mmBtu | D. Limited Emission Rate: 0.10 lb / NMWh ~ 0.02 lb/mmBtu | E. Specific Source Test or Monitoring Record Citation: Attachment 59N2, Condition 1 | F. Test Date: 10/21/2009 |

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|-----------------------------------------------|-------------------------------------|-------------------------------------------------------------------------------------------|-----------------------------|
| A. Emission Unit Description: Mandalay Unit 1 | | | B. Pollutant: NH3 |
| C. Measured Emission Rate: 1.5 ppm | D. Limited Emission Rate: 10 ppm | E. Specific Source Test or Monitoring Record Citation: Attachment 59N2, Condition 3 | F. Test Date: 08/17/2010 |

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|-----------------------------------------------|----------------------------------------------------------------|-------------------------------------------------------------------------------------------|-----------------------------|
| A. Emission Unit Description: Mandalay Unit 2 | | | B. Pollutant: NOx |
| C. Measured Emission Rate: 0.007 lb/mmBtu | D. Limited Emission Rate: 0.10 lb / NMWh ~ 0.02 lb/mmBtu | E. Specific Source Test or Monitoring Record Citation: Attachment 59N2, Condition 1 | F. Test Date: 09/29/2010 |

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|-----------------------------------------------|-------------------------------------|-------------------------------------------------------------------------------------------|-----------------------------|
| A. Emission Unit Description: Mandalay Unit 2 | | | B. Pollutant: NH3 |
| C. Measured Emission Rate: 8.8 ppm | D. Limited Emission Rate: 10 ppm | E. Specific Source Test or Monitoring Record Citation: Attachment 59N2, Condition 3 | F. Test Date: 07/20/2010 |

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|-------------------------------|---------------------------|-----------------------------------------------------------|---------------|
| A. Emission Unit Description: | | | B. Pollutant: |
| C. Measured Emission Rate: | D. Limited Emission Rate: | E. Specific Source Test or Monitoring Record Citation: | F. Test Date: |



ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 10 / 01 / 2009 (MM/DD/YY) to 09 / 30 / 2010 (MM/DD/YY)

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| <p>A. Attachment # or Permit Condition #: Attachment 59N2, Condition 3</p> | <p>B. Equipment description: Mandalay Unit 1</p> | <p>C. Deviation Period: Date & Time Begin: <u>August 1, 2010</u> End: <u>August 17, 2010</u> When Discovered: Date & Time <u>August 17, 2010</u></p> |
| <p>D. Parameters monitored: <u>NI13</u></p> | <p>E. Limit: <u>10 ppm</u></p> | <p>F. Actual: <u>1.5 ppm</u></p> |
| <p>G. Probable Cause of Deviation: Annual test occurred after July 31, the 12-month deadline established by APCD policy. As indicated, when tested, ammonia slip emissions were demonstrated to be in compliance.</p> | | <p>H. Corrective actions taken: An extension to the July 31 deadline was requested of the District to allow for scheduling and completion of testing in the months of August-September when the Unit was expected to operate more frequently and for longer periods of time. Prior to July 31, Unit 1 had operated for only approximately 7 non-continuous days and the longest continuous run during these operating periods had been only 4 days. Because this testing is performed by a third party contractor, RRI was unable to procure the test contractor and schedule the testing before the Unit shut down. The District extended the deadline to September 30, 2010.</p> |

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| <p>A. Attachment # or Permit Condition #: Attachment 103N1-13, Condition 2</p> | <p>B. Equipment description: Mandalay Unit 1 CEMS</p> | <p>C. Deviation Period: Date & Time Begin: <u>August 27, 2010 @ 12:12 pm</u> End: <u>August 28, 2010 @ 12:40 pm</u> When Discovered: Date & Time <u>August 28, 2010 ~ 12:00 pm</u></p> |
| <p>D. Parameters monitored: <u>NOx</u></p> | <p>E. Limit: <u>N/A</u></p> | <p>F. Actual: <u>N/A</u></p> |
| <p>G. Probable Cause of Deviation: A 4-hour notification of a NOx CEMS out-of-control period was inadvertently overlooked. The notification was provided approximately 24 hours after the situation was discovered and corrected.</p> | | <p>H. Corrective actions taken: Notification was made immediately upon discovery. The follow-up report was timely. Please see September 2, 2010 follow-up letter for detail on the event.</p> |



ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 10 / 01 / 2009 (MM/DD/YY) to 09 / 30 / 2010 (MM/DD/YY)

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| A. Attachment # or Permit Condition #: Attachment I03N1-13, Condition 2 | B. Equipment description: Mandalay Unit 2 CEMS | C. Deviation Period: Date & Time Begin: <u>September 2, 2010 @ 12:18 pm</u> End: <u>September 2, 2010 @ 13:55 pm</u> When Discovered: Date & Time <u>September 2, 2010 @ 13:55 pm</u> |
| D. Parameters monitored: NOx | E. Limit: N/A | F. Actual: N/A |
| G. Probable Cause of Deviation: NOx analyzer photomultiplier tube cooler replacement took longer than anticipated, resulting in 1 hour of lost emission data (the 1300 hour). | | H. Corrective actions taken: Replacement was completed as expeditiously as possible. Unit operations were normal during this time, thus it is believed there were no excess emissions. The District was timely notified. |



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 10 / 01 / 2009 (MM/DD/YY) to 09 / 30 / 2010 (MM/DD/YY)

Mandalay Generating Station

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| <p>A. Attachment # or Permit Condition #: Attachment 59N2, Condition #1</p> | <p>D. Frequency of monitoring: Continuous</p> |
| <p>B. Description: NOx Emission Limit Condition 1a – Certified CEMS data demonstrates that there have been no exceedances of the 0.10 lbs/mw-hr limit. 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.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: CEMs Records and Emission Calculations</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p> |

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| <p>A. Attachment # or Permit Condition #: Attachment 59N2, Condition #2</p> | <p>D. Frequency of monitoring: Continuous</p> |
| <p>B. Description: Oil Burned During Force Majeure Mandalay Generating Station is only permitted to burn natural gas in its boilers.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: Fuel Usage Logs</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p> |

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| <p>A. Attachment # or Permit Condition #: Attachment 59N2, Condition #3</p> | <p>D. Frequency of monitoring: Continuous</p> |
| <p>B. Description: NH3 Emissions The Annual Ammonia Slip Tests for Units 1 and 2 were conducted on 08/17/2010 and 07/20/2010, respectively. The ammonia slip limit is 10 ppm - Unit 1 tested at 1.5 ppm. Unit 2 tested at 8.8 ppm. APCD extended the July 31 test deadline to September 30, nevertheless, the fact that the Unit 1 test was performed after July 31 is reported on the attached Deviation Summary form.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable BAAQMD method ST-1B dated 01/20/1982</p> |
| <p>C. Method of monitoring: Source Testing Reports</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>Y</u> *If yes, attach Deviation Summary Form</p> |



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

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Mandalay Generating Station

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| <p>A. Attachment # or Permit Condition #: Attachment 59N2, Condition #4</p> | <p>D. Frequency of monitoring: Continuous</p> |
| <p>B. Description: Cold Start-up waiver for NOx and NH3 Emission Limits There were 48 Unit 1 start-ups during the compliance period. There were 66 Unit 2 start-ups during the compliance period. Plant records indicate that no cold start-up lasted more than 10 hours, nor have any excess NOx emissions lasted longer than a cold start-up procedure.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: CEMs Records and Operator Logs</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p> |

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| <p>A. Attachment # or Permit Condition #: Attachment 59N2, Condition #5</p> | <p>D. Frequency of monitoring: Continuous</p> |
| <p>B. Description: NOx lbs/MW-Hr Condition 5a - CEMs are used to monitor and calculate 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.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: CEMs Records and Emission Calculations</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p> |

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| <p>A. Attachment # or Permit Condition #: Attachment 59N2, Conditions #6 & #7</p> | <p>D. Frequency of monitoring: Continuous</p> |
| <p>B. Description: Hourly Recordkeeping The Station maintains operational records as detailed in Conditions 6 and 7. Such records are available to the District upon request.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: CEMs Records and Operator Logs</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p> |



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Mandalay Generating Station

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| <p>A. Attachment # or Permit Condition #: Attachment 70N3-13, Conditions #1 - #2</p> | <p>D. Frequency of monitoring: Periodic</p> |
| <p>B. Description: Phase 1 & 2 Vapor Recovery System</p> <p>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.</p> <p>Condition 2 – The Phase 1 vapor recovery equipment has a coaxial VRS system and a permanently installed submerged fill pipe. The VRS equipment is maintained in good condition.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: Inspection, Maintenance, and Testing Records</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p> |

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| <p>A. Attachment # or Permit Condition #: Attachment 70N3-13, Conditions #3 - #6</p> | <p>D. Frequency of monitoring: Periodic</p> |
| <p>B. Description: Phase 1 & 2 Vapor Recovery System</p> <p>Condition 3-4 - Phase II dispensing equipment is a VRS vapor balance system.</p> <p>Condition 5 – Required signs are posted and readily visible.</p> <p>Condition 6 – The site conducts static testing every year and a liquid removal test every four years.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: Inspection, Maintenance, and Testing Records</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p> |

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| <p>A. Attachment # or Permit Condition #: Attachment 70N3-13, Conditions #7 - #8</p> | <p>D. Frequency of monitoring: Periodic</p> |
| <p>B. Description: Phase 1 & 2 Vapor Recovery System</p> <p>Condition 7 – Records of all tests and repairs are maintained at the site.</p> <p>Condition 8 – RRI Energy agrees that if it seeks replacement or modification of the dispensing facility it will seek a permit to construct.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: Inspection, Maintenance, and Testing Records</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p> |



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

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Mandalay Generating Station

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| <p>A. Attachment # or Permit Condition #: Attachment 74.9N7, Conditions #1 - #4</p> | <p>D. Frequency of monitoring: Periodic</p> |
| <p>B. Description: Stationary Internal Combustion Engines Condition 1 - Hourly operating records verify compliance with the 50 hour annual limit. Condition 2 - A non-resettable elapsed hour meter is operated on each unit. Condition 3 - The Perkins model 1006-GT emergency fire pump is located in the circ water pump pit; the Generac model 96A-00728-S emergency generator is located in the rear employee parking lot. Condition 4 - Calendar year hours of maintenance operation are reported by Feb 15.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: Maintenance and Operating Logs</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p> |

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| <p>A. Attachment # or Permit Condition #: Attachment ATCM Engine N1, Conditions #1 - #3</p> | <p>D. Frequency of monitoring: Periodic</p> |
| <p>B. Description: Fuel Use and Operation Recordkeeping Condition 1 - Only CARB Diesel Fuel is used at the facility Condition 2 - Maintenance and testing operation of the emergency fire pump is logged monthly Condition 3 - Records of operation and fuel purchased (type and quantity) are maintained on site</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: Purchase Records and Operation Log</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p> |

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| <p>A. Attachment # or Permit Condition #: Attachment ATCM Engine N2, Conditions #1 - #3</p> | <p>D. Frequency of monitoring: Periodic</p> |
| <p>B. Description: Fuel Use and Operation Recordkeeping Condition 1 - Only CARB Diesel Fuel is used at the facility Condition 2 - Maintenance and testing operation of the emergency generator is limited to 20 hr/yr and is logged monthly Condition 3 - Records of operation and fuel purchased (type and quantity) are maintained on site</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: Purchase Records and Operation Log</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p> |



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Mandalay Generating Station

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| <p>A. Attachment # or Permit Condition #: Attachment 74.23N8, Conditions #1 - #3</p> | <p>D. Frequency of monitoring: Continuous</p> |
| <p>B. Description: Stationary Gas Turbines Condition 1 - A totalizing operating hour meter is installed; monthly records of operating hours are maintained. Condition 2 - Unit 3 operated 61.82 hours in calendar year 2009 and 52.60 hours during the Oct 2009 - Sept 2010 compliance year. Condition 3 - Actual operating hours are maintained below 200 hours/year.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Non-resettable totalizing hour meter</p> |
| <p>C. Method of monitoring: Operating Logs</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p> |

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| <p>A. Attachment # or Permit Condition #: Attachment 103N1-13, Conditions #1 - #3</p> | <p>D. Frequency of monitoring: Continuous</p> |
| <p>B. Description: Continuous Monitoring Systems 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. Two events subject to 103N2, Condition 2 are reported on the attached Deviation Summary form. Condition 3 - Monitored violations are reported to the District within 96 hours.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: CEMs Inspection, Maintenance, Testing, and Reporting Records</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>I</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>Y</u> *If yes, attach Deviation Summary Form</p> |

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| <p>A. Attachment # or Permit Condition #: Attachment 103N1-13, Conditions #4 - #6</p> | <p>D. Frequency of monitoring: Continuous</p> |
| <p>B. Description: Continuous Monitoring Systems 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.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: CEMs Inspection, Maintenance, Testing, and Reporting Records</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p> |



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Mandalay Generating Station

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| <p>A. Attachment # or Permit Condition #: PO00013PC1, Conditions #1 - #2</p> | <p>D. Frequency of monitoring: Continuous</p> |
| <p>B. Description: General Recordkeeping Requirements and Solvent Cleaning Additional Requirements</p> <p>Condition 1 - Monthly record-keeping of permitted throughput and consumption, including fuel consumption, are maintained on site. Unit 3 consumed 62.39 mmcf of natural gas during the Oct 2009 - Sept 2010 compliance year.</p> <p>Condition 2 - Mandalay only uses cleaning products in nonrefillable aerosol cans. Records are maintained onsite.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: Rules 26 and 29 Fuel Throughput/Consumption and Rule 29 Solvent Usage Records</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p style="text-align: right;">*If yes, attach Deviation Summary Form</p> |

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| <p>A. Attachment # or Permit Condition #: PO00013PC2, Conditions #1 - #2</p> | <p>D. Frequency of monitoring: Continuous</p> |
| <p>B. Description: Rule 29 Natural Gas Combustion Only Requirements</p> <p>Condition 1, 2 - Only natural gas is fired in Units 1 and 2 and the Turbine Peaking Unit.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: Fuel Usage Records</p> | <p>F. Currently In Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p style="text-align: right;">*If yes, attach Deviation Summary Form</p> |

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| <p>A. Attachment # or Permit Condition #: Attachment 50, Conditions #1 - #4</p> | <p>D. Frequency of monitoring: Periodic</p> |
| <p>B. Description: Opacity Limitations</p> <p>Method 9 opacity readings were done on the following sources during the compliance period; records are attached verifying no visible emissions.</p> <p>Main Units (Unit 1 and Unit 2) and Unit 3 (Turbine Peaking Unit)</p> <p>Emergency Generator and Emergency Firewater Pump</p> <p>Bead Blaster</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable EPA Method 9</p> |
| <p>C. Method of monitoring: Routine Visual Surveillance and Certification Records</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p style="text-align: right;">*If yes, attach Deviation Summary Form</p> |



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Mandalay Generating Station

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| <p>A. Attachment # or Permit Condition #: Attachment 54.B.1, Conditions #1 - #3</p> | <p>D. Frequency of monitoring: Periodic</p> |
| <p>B. Description: Sulfur Compounds Compliance with Rule 64 ensures compliance with this rule based on District analysis. Compliance is assured because only PUC-regulated natural gas is combusted at the facility.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: Fuel Sulfur Analyses</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p> |

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| <p>A. Attachment # or Permit Condition #: Attachment 54.B.2, Conditions #1 - #3</p> | <p>D. Frequency of monitoring: Annually</p> |
| <p>B. Description: Sulfur Compound's Ground Level Units 1, 2, and the Turbine Peaking Unit burn PUC quality natural gas. A fuel sulfur sample analysis is verified annually and maintained on site. District analysis dated 05/23/96 confirms compliance for the diesel-fired generator and firewater pump.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: Recordkeeping and Modeling Demonstration</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p> |

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| <p>A. Attachment # or Permit Condition #: Attachment 55, Conditions #1 - #7</p> | <p>D. Frequency of monitoring: Periodic</p> |
| <p>B. Description: Fugitive Dust There are no operations, disturbed surface areas, or man-made conditions that are subject to Rule 55.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: Onsite Operations Review - Permit Condition Not Currently Applicable</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p> |



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

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Mandalay Generating Station

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| <p>A. Attachment # or Permit Condition #: Attachment 57.1, Conditions #1 - #2</p> | <p>D. Frequency of monitoring: Continuous</p> |
| <p>B. Description: Particulate Emissions from Fuel Burning Equipment Periodic Monitoring not required. District analysis dated 09/03/98 confirms compliance. (The 12/03/97 analysis noted in the permit is for Rule 68 and does not apply to Attachment 57.1)</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: Rule 57.B District Analysis</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p> |

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| <p>A. Attachment # or Permit Condition #: Attachment 64.B.1, Conditions #1 - #4</p> | <p>D. Frequency of monitoring: Continuous</p> |
| <p>B. Description: Sulfur Content of Gaseous Fuels Only PUC-regulated Natural Gas is combusted at this facility. Records are available on site.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: Fuel Sulfur Analyses</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p> |

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| <p>A. Attachment # or Permit Condition #: Attachment 64.B.2, Conditions #1 - #3</p> | <p>D. Frequency of monitoring: Continuous</p> |
| <p>B. Description: Sulfur Content of Liquid Fuel The site uses CARB-approved diesel in the emergency generator and emergency firewater pump. Fuel purchase records are maintained onsite for District review; delivery record is attached confirming use of CARB Diesel.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: CARB Diesel Purchase Records</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p> |



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

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Mandalay Generating Station

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| <p>A. Attachment # or Permit Condition #: Attachment 74.6, Conditions #1 - #15</p> | <p>D. Frequency of monitoring: Continuous</p> |
| <p>B. Description: Surface Cleaning and Degreasing Mandalay only uses cleaning products in nonrefillable aerosol cans. Records are maintained onsite.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: Routine surveillance of Solvent Usage, and Activity Records</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p> |

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| <p>A. Attachment # or Permit Condition #: Attachment 74.11.1, Conditions #1 - #4</p> | <p>D. Frequency of monitoring: N/A</p> |
| <p>B. Description: Large Water Heaters and Small Boilers Only electric water heaters are used at the site and no small boilers exist at the facility, compliance with the requirements is not required.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: Equipment Design Record Review - Permit Condition Not Currently Applicable</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p> |

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| <p>A. Attachment # or Permit Condition #: Attachment 74.22, Conditions #1 - #3</p> | <p>D. Frequency of monitoring: N/A</p> |
| <p>B. Description: Natural gas Fired Fan-type Central Furnaces No natural gas-fired fan-type central furnaces to which the attachment applies exist at the facility, compliance with the requirements is not required.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: Equipment Design Record Review - Permit Condition Not Currently Applicable</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p> |



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

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Mandalay Generating Station

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| <p>A. Attachment # or Permit Condition #: Attachment 74.1, Conditions #1 - #7</p> | <p>D. Frequency of monitoring: Periodic</p> |
| <p>B. Description: Abrasive Blasting Bead blast records are available for review at the plant.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: Operating Log Records; Routine Surveillance of Bead Blaster</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p> |

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| <p>A. Attachment # or Permit Condition #: Attachment 74.2, Conditions #1 - #6</p> | <p>D. Frequency of monitoring: Continuous</p> |
| <p>B. Description: Architectural Coatings Facility maintains records of paints used and VOC content for District review.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: Routine Surveillance of Paint Usage, and Activity Records</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p> |

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| <p>A. Attachment # or Permit Condition #: Attachment 74.29N3, Conditions #1 - #14</p> | <p>D. Frequency of monitoring: N/A</p> |
| <p>B. Description: Soil Decontamination Operations No soil remediation is taking place at the Mandalay Generating Station.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: Onsite Operations Review - Permit Condition Not Currently Applicable</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p> |



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

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| <p>A. Attachment # or Permit Condition #: Attachment 40CFR61.M, Conditions #1 - #2</p> | <p>D. Frequency of monitoring: Periodic</p> |
| <p>B. Description: Asbestos Standard Inspection, Notification, and Contractor Records are maintained onsite.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: Inspection, Notification, and Contractor Records</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p> |

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| <p>A. Attachment # or Permit Condition #: Attachment Part 70 General, Conditions #1 - #3</p> | <p>D. Frequency of monitoring: Continuous</p> |
| <p>B. Description: General Part 70 Permit Conditions Condition 1 - Compliance status of each federally enforceable condition is reviewed. Condition 2 - Facility strives to comply with all applicable conditions. Condition 3 - Facility acknowledges deviations from Part 70 requirements are to be reported within 4 hours.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: Title V Reports and Periodic Review of Requirements</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>I</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>Y</u> *If yes, attach Deviation Summary Form</p> |

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| <p>A. Attachment # or Permit Condition #: Attachment Part 70 General, Conditions #4 - #7</p> | <p>D. Frequency of monitoring: Continuous</p> |
| <p>B. Description: General Part 70 Permit Conditions Condition 4 - Facility understands that the need to halt an activity to comply is not a defense against enforcement action 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.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: Title V Reports and Periodic Review of Requirements</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p> |



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

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Mandalay Generating Station

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| <p>A. Attachment # or Permit Condition #: Attachment Part 70 General, Conditions #8 - #10</p> | <p>D. Frequency of monitoring: Continuous</p> |
| <p>B. Description: General Part 70 Permit Conditions Condition 8 - Facility understands that the permit may be modified, revoked, reopened, reissued, or terminated for cause 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.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: Title V Reports and Periodic Review of Requirements</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p> |

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| <p>A. Attachment # or Permit Condition #: Attachment Part 70 General, Conditions #11 - #13</p> | <p>D. Frequency of monitoring: Continuous</p> |
| <p>B. Description: General Part 70 Permit Conditions Condition 11 - Facility recognizes that the permit does not provide any specific property rights. Condition 12 - Facility recognizes that the permit provisions are severable. 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</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: Title V Reports and Periodic Review of Requirements</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p> |

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| <p>A. Attachment # or Permit Condition #: Attachment Part 70 General, Conditions #14 - #15</p> | <p>D. Frequency of monitoring: Continuous</p> |
| <p>B. Description: General Part 70 Permit Conditions 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.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: Title V Reports and Periodic Review of Requirements</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p> |



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| <p>A. Attachment # or Permit Condition #: Attachment PO General, Conditions #1 - #2</p> | <p>D. Frequency of monitoring: Continuous</p> |
| <p>B. Description: General Permit to Operate Conditions 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.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: Periodic Review of Requirements</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p> |

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| <p>A. Attachment # or Permit Condition #: Attachment PO General, Conditions #3 - #4</p> | <p>D. Frequency of monitoring: Continuous</p> |
| <p>B. Description: General Permit to Operate Conditions 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.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: Periodic Review of Requirements</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p> |

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| <p>A. Attachment # or Permit Condition #: INTENTIONALLY LEFT BLANK</p> | <p>D. Frequency of monitoring:</p> |
| <p>B. Description:</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p> |
| <p>C. Method of monitoring:</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p> |



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| A. Attachment # or Permit Condition #: Attachment SHIELD - D, Da, Db | D. Frequency of monitoring: Continuous |
| B. Description: Permit Shield - New Source Performance Standards Facility periodically reviews applicability of identified NSPS subparts | E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A |
| C. Method of monitoring: Periodic Review of Potentially Applicable Requirements | F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form |

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| A. Attachment # or Permit Condition #: Attachment SHIELD - GG | D. Frequency of monitoring: Continuous |
| B. Description: Permit Shield - New Source Performance Standards Facility periodically reviews applicability of identified NSPS subparts | E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A |
| C. Method of monitoring: Periodic Review of Potentially Applicable Requirements | F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form |

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| A. Attachment # or Permit Condition #: Attachment SHIELD - YYYY | D. Frequency of monitoring: Continuous |
| B. Description: Permit Shield - National Emissions Standards for Hazardous Air Pollutants Facility periodically reviews applicability of identified NESHAP subparts | E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A |
| C. Method of monitoring: Periodic Review of Potentially Applicable Requirements | F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form |



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Mandalay Generating Station

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| <p>A. Attachment # or Permit Condition #: Attachment 40CFR68RMP-13</p> | <p>D. Frequency of monitoring: Annually</p> |
| <p>B. Description: Risk Management Plan The site has a current and complete Risk Management Plan.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: Risk Management Plan Documentation and Review</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p> |

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| <p>A. Attachment # or Permit Condition #: Attachment 40CFR72-78</p> | <p>D. Frequency of monitoring: Continuous</p> |
| <p>B. Description: Acid Rain Program Facility maintains records to ensure compliance with monitoring, emission limits, recordkeeping, and reporting requirements.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: Periodic Review of Requirements</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p> |

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| <p>A. Attachment # or Permit Condition #: Attachment 40CFR82</p> | <p>D. Frequency of monitoring: Continuous</p> |
| <p>B. Description: Protection of Stratospheric Ozone Certified contractors are used to conduct any air conditioning work in the plant.</p> | <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p> |
| <p>C. Method of monitoring: Inspection, Notification, and Contractor Records</p> | <p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p> |



Silvas Oil Company, Inc.
Independent Petroleum Distributor

CORPORATE OFFICE
2121 So. Third St.
P.O. Box 104B - Fresno, CA 93714
(559) 233-5171 - www.silvasoil.com

ExxonMobil ConocoPhillips



PLEASE RETURN REMITTANCE TO
ADDRESS ABOVE

ACCOUNT NUMBER: 2478

4501290684

INVOICE

NUMBER: 150751

DATE: 03-29-10

SOLD TO: RRI ENERGY, INC.

SHIP TO: RRI ENERGY, INC.

MANDALAY GENERATING STATION
393 N. HARBOR BLVD.
OXNARD, CA 93035

MANDALAY GENERATING STATION
393 N. HARBOR BLVD.
OXNARD, CA 93035

| STATEMENTS ON THE REVERSE SIDE ARE MADE A PART HEREOF. | | | | PURCH. ORDER NUMBER | | | | | |
|----------------------------------------------------------------|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|--------------------------------------|----------------------------------------------------------|------------------------|-------------------|-----------------------------|----------|
| DELIVERED BY (SIGNATURE IN FULL) | | RECEIVED IN GOOD ORDER | | 4600016493 | | | | | |
| X | | X | | This invoice amount due on: 04-13-10 | | | | | |
| | | | | NET 15 | | | | | |
| NO. OF PKG'S | BULK OR PKG. SIZE | PRODUCT DELIVERED | ORDERED | DELIVERED | TAXES | | | PRICE | AMOUNT |
| | | | | | FED | STATE | SALES | | |
| | | DIESEL FUEL - 3, NA1993, PG III CARB (RED) ULS DIESEL #2 THIS PRODUCT IS BEING SOLD FOR OFF HIGHWAY USE ONLY AND IS NOT LEGAL FOR MOTOR VEHICLE USE FEDERAL LUST TAX | 400 | 400 | | | T | 2.53900 | 1,015.60 |
| | | | | 400 | | | | 0.00100 | 0.40 |
| FOR EMERGENCY RESPONSE CALL 1-559-994-5200 SG AR 78005744 | | | | | | | | | |
| SALESMAN - 20 | | | PLACARD | | YES <input type="checkbox"/> NO <input type="checkbox"/> | | SALES TAX ▶ 8.750 | | 88.90 |
| DRUMS DELIVERED ▶ | | | DRUMS RETURNED ▶ | | DRUMS NET ▶ | | | | |
| ERRORS IN PRICE, EXTENSION AND ADDITION SUBJECT TO CORRECTION. | | | | | | | | TOTAL ▶ 1,104.90 | |
| FRESNO 559.233.5171 | | HANFORD 559.582.0221 | | KINGSBURG 559.897.5117 | | OXNARD 805.485.4581 | | PORTERVILLE 559.784.3017 | |
| | | | SAN LUIS OBISPO 805.782.9201 | | SANTA MARIA 805.925.7678 | | | | |



Silvas Oil Company, Inc.
Independent Petroleum Distributor

CORPORATE OFFICE
2121 So. Third St.
P.O. Box 1048 - Fresno, CA 93714
(558) 233-5171 - www.silvasoil.com



ACCOUNT NUMBER: 2478

4501297074

INVOICE

NUMBER: 152037

DATE: 05-07-10

SOLD TO: RRI ENERGY, INC.

SHIP TO: RRI ENERGY, INC.

MANDALAY GENERATING STATION
393 N. HARBOR BLVD.
OXNARD, CA 93035

MANDALAY GENERATING STATION
393 N. HARBOR BLVD.
OXNARD, CA 93035

| STATEMENTS ON THE REVERSE SIDE ARE MADE A PART HEREOF. | | | | PURCH. ORDER NUMBER | | | | | |
|----------------------------------------------------------------|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------|--------------------------------------|-----------|---------------------------------|---------|-----------------------------|----------|
| DELIVERED BY (SIGNATURE IN FULL) | | RECEIVED IN GOOD ORDER | | 4600016493 | | | | | |
| X | | X | | This invoice amount due on: 05-22-10 | | | | | |
| NET 15 | | | | | | | | | |
| NO. OF PKG'S | BULK OR PKG. SIZE | PRODUCT DELIVERED | ORDERED | DELIVERED | TAXES | | | PRICE | AMOUNT |
| | | | | | FED | STATE | ENR/S | | |
| | | DIESEL FUEL - 3, NA1993, PG III CARB (RED) ULS DIESEL #2 THIS PRODUCT IS BEING SOLD FOR OFF HIGHWAY USE ONLY AND IS NOT LEGAL FOR MOTOR VEHICLE USE FEDERAL LUST TAX | 410 | 410 | | | T | 2.74900 | 1,127.09 |
| | | | | 410 | | | | 0.00100 | 0.41 |
| 2 | EACH | UN RATED CLOSED TOP DRUM CUST REQST BOTH ITEMS BE ON THE SAME TICKET... USE THE BLANKET PO FOR THIS ORDER P.O. 4600016493 FOR EMERGENCY RESPONSE CALL 1-559-994-5200 SG AR 78005744 | 2 | 2 | | | T | 36.27000 | 72.54 |
| SALESMAN - 20 | | | PLACARD YES <input type="checkbox"/> NO <input type="checkbox"/> | | SALES TAX | | 8.750 | 105.01 | |
| DRUMS DELIVERED ▶ | | DRUMS RETURNED ▶ | | DRUMS NET ▶ | | | | | |
| ERRORS IN PRICE, EXTENSION AND ADDITION SUBJECT TO CORRECTION. | | | | | | | TOTAL ▶ | | 1,305.05 |
| FRESNO 558.233.5171 | | HANFORD 558.682.0221 | | KINGSBURG 558.897.5117 | | OXNARD 805.486.4584 | | PORTERVILLE 558.784.3017 | |
| | | | | | | SAN LUIS OBISPO 805.782.9201 | | SANTA MARIA 805.925.7878 | |

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, Milko

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

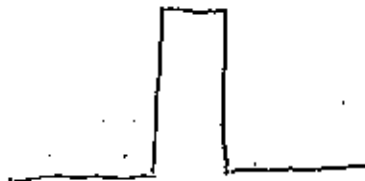
Certified for: 100.1 Average Dev. White Black
100.1 - 80, 100.2 - 80
Sun glasses: 3.4 White 2.6 Black

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 | | | | | | 11 | 31 | 0 | 0 | 0 | 0 |
| | 02 | | | | | | | 32 | 0 | 0 | 0 | 0 |
| | 03 | | | | | | | 33 | 0 | 0 | 0 | 0 |
| | 04 | | | | | | | 34 | 0 | 0 | 0 | 0 |
| | 05 | | | | | | | 35 | 0 | 0 | 0 | 0 |
| | 06 | | | | | | | 36 | 0 | 0 | 0 | 0 |
| | 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 | | | | | | | 56 | | | | |
| | 27 | | | | | | | 57 | | | | |
| | 28 | | | | | | | 58 | | | | |
| | 29 | | | | | | | 59 | | | | |

Comments/Notes: STACK HEIGHT = 209 FT
UNIT LOAD \approx 50 NMW
READINGS FROM 500 FT AWAY



X OBSERVER

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 Report: <http://www.arb.ca.gov/CAP/100/1.htm>

Night Report: <http://www.arb.ca.gov/CAP/100/2.htm>

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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

Michael Escarcega
Authorized Signature

January 14, 2009

Course date

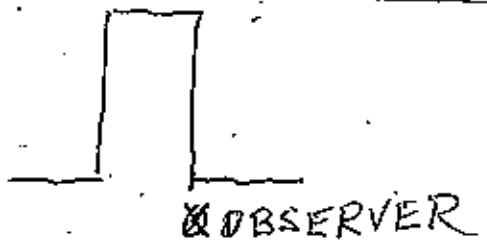
Certified for: 100.1 Average Day. White Black
100.1 - day, 100.2 - night Sun glasses: 3.4 White 2.2 Black

RECORD OF VISIBLE EMISSIONS

Client/Location MANDALAY UNIT 2 Date 2/18/09
 Unit 2 Fuel NAT. GAS Test No. 1 Observer M. ESCARREGA
 Weather Conditions CLEAR 5-10 MPH WINDS
 Observer's Location SEE SKETCH BELOW

| Hr | Time | | | | Comments | Hr | Time | | | | Comments | |
|----|------|---------|----|----|----------|----|------|---------|----|----|----------|--|
| | Min | Seconds | | | | | 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

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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 2816, 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

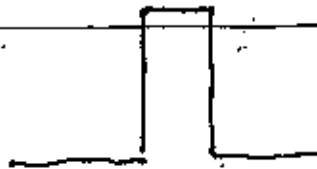
Certified for: 100.1 Average Dev. White Black
100.1 = day, 100.2 = night Sun glasses: 4.8 White 4.4 Black

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 | 45 | |
| | 00 | | | | | | | | | | | |
| | 01 | | | | | | | | | | | |
| | 02 | | | | | | | | | | | |
| | 03 | | | | | | | | | | | |
| | 04 | | | | | | | | | | | |
| | 05 | | | | | 08 | 35 | 0 | 0 | 0 | 5 | |
| | 06 | | | | | | 36 | 0 | 0 | 0 | 0 | |
| | 07 | | | | | | 37 | 5 | 0 | 0 | 0 | |
| | 08 | | | | | | 38 | 0 | 0 | 0 | 0 | |
| | 09 | | | | | | 39 | 5 | 0 | 0 | 5 | |
| | 10 | | | | | | 40 | 0 | 0 | 0 | 0 | |
| | 11 | | | | | | 41 | 0 | 0 | 5 | 0 | |
| | 12 | | | | | | 42 | 0 | 0 | 0 | 5 | |
| | 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 = 50-FT
READINGS FROM 150 FT AWAY - - - - -> WIND



X OBSERVER

RECORD OF VISIBLE EMISSIONS

Client/Location MANDALAY UNIT 3

Date 9/21/09

Unit 344 PAIR Fuel NAT. GAS Test No. 1

Observer M. ESCARCEGA

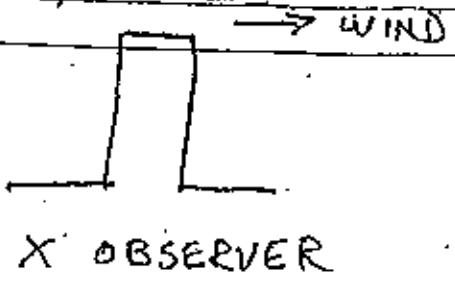
Weather Conditions CLOUDY - NO SUN

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 | | | | | | | | | | | |
| | 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 | 0 | |
| | 10 | | | | | | 39 | 5 | 0 | 0 | 0 | |
| | 11 | | | | | | 40 | 0 | 5 | 0 | 0 | |
| | 12 | | | | | | 41 | 0 | 0 | 0 | 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:

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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 2915, 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

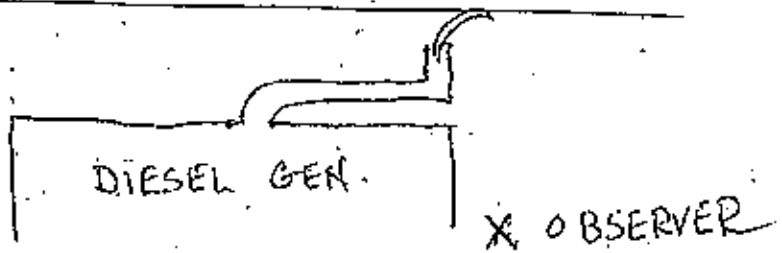
Certified for: 100.1 Average Dev. White Black
100.1 = Day, 100.2 = Night Sun glasses: 3.4 White 2.2 Black

RECORD OF VISIBLE EMISSIONS

Client/Location MANDALAY DIESEL AUX. ELEC. GEN. Date 6/10/09
 Unit _____ Fuel DIESEL Test No. 1 Observer M. ESCARCEGA
 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 | | | | | | | | | | | | |
| 03 | | | | | | 09 | 32 | 0 | 0 | 0 | 5 | |
| 04 | | | | | | | 33 | 0 | 0 | 0 | 0 | |
| 05 | | | | | | | 34 | 0 | 5 | 4 | 0 | |
| 06 | | | | | | | 35 | 0 | 0 | 0 | 0 | |
| 07 | | | | | | | 36 | 5 | 0 | 5 | 0 | |
| 08 | | | | | | | 37 | 0 | 0 | 0 | 0 | |
| 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 = 10 FT.
READINGS FROM ~ 30 FT. AWAY.

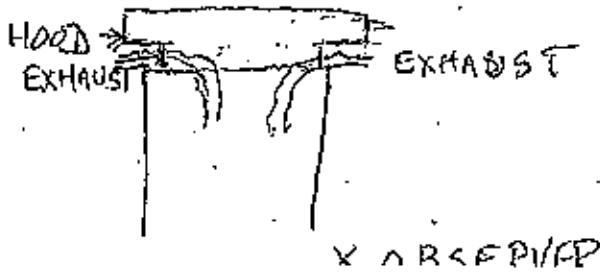


RECORD OF VISIBLE EMISSIONS

Client/Location MANDALAY BEAD BLASTER Date 6/10/09
 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 | 45 | |
| | 00 | | | | | | | | | | | |
| | 01 | | | | | | | 30 | | | | |
| | 02 | | | | | | | 31 | | | | |
| | 03 | | | | | | | 32 | | | | |
| | 04 | | | | | | | 33 | | | | |
| | 05 | | | | | | | 34 | | | | |
| | 06 | | | | | | | 35 | | | | |
| | 07 | | | | | | | 36 | | | | |
| | 08 | | | | | | | 37 | | | | |
| | 09 | | | | | | | 38 | | | | |
| | 10 | | | | | | | 39 | | | | |
| | 11 | | | | | | | 40 | | | | |
| | 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 | 0 | 0 | 0 | 0 |
| | 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 SALT FIREWATER PUMP Date 6/10/09
 Unit _____ Fuel DIESEL Test No. 1 Observer M. ESCARCEGA

Weather Conditions PTLY. 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 | | | | | | |
| | 01 | 5 | 10 | 5 | 10 | | | | | | |
| | 02 | | | | | | | | | | |
| | 03 | | | | | | | | | | |
| | 04 | | | | | | | | | | |
| | 05 | | | | | | | | | | |
| | 06 | | | | | | | | | | |
| | 07 | | | | | | | | | | |
| | 08 | | | | | | | | | | |
| | 09 | | | | | | | | | | |
| | 10 | | | | | | | | | | |
| | 11 | | | | | | | | | | |
| | 12 | | | | | | | | | | |
| | 13 | | | | | | | | | | |
| | 14 | | | | | | | | | | |
| | 15 | | | | | | | | | | |
| | 16 | | | | | | | | | | |
| | 17 | | | | | | | | | | |
| | 18 | | | | | | | | | | |
| | 19 | | | | | | | | | | |
| | 20 | | | | | | | | | | |
| | 21 | | | | | | | | | | |
| | 22 | | | | | | | | | | |
| | 23 | | | | | | | | | | |
| | 24 | | | | | | | | | | |
| | 25 | | | | | | | | | | |
| | 26 | | | | | | | | | | |
| | 27 | | | | | 109 | 56 | 5 | 5 | 5 | 10 |
| | 28 | | | | | | 57 | 5 | 10 | 5 | 5 |
| | 29 | | | | | | 58 | 10 | 5 | 5 | 10 |
| | | | | | | | 59 | 5 | 10 | 5 | 5 |

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

