



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

**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	Date: 11/10/2010
Title: Director, Environmental Compliance	

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. Ormond Beach Generating Station

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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)

A. Emission Unit Description: Ormond Beach Unit 1			B. Pollutant: NOx
C. Measured Emission Rate: 0.006 lb/mmBtu	D. Limited Emission Rate: 0.10 lb / NMWh	E. Specific Source Test or Monitoring Record Citation: Attachment 59N1, Condition 1	F. Test Date: 07/22/2009 (This data is from the most recent CEMS RATA testing – none has been required since then due to infrequent unit operation)

A. Emission Unit Description: Ormond Beach Unit 1			B. Pollutant: NH3
C. Measured Emission Rate: 1.0 ppm	D. Limited Emission Rate: 10 ppm	E. Specific Source Test or Monitoring Record Citation: Attachment 59N1, Condition 3	F. Test Date: 09/21/2010

A. Emission Unit Description: Ormond Beach Unit 2			B. Pollutant: NOx
C. Measured Emission Rate: 0.008 lb/mmBtu	D. Limited Emission Rate: 0.10 lb / NMWh	E. Specific Source Test or Monitoring Record Citation: Attachment 59N1, Condition 1	F. Test Date: 11/14/2008 (This data is from the most recent CEMS RATA testing – none has been required since then due to infrequent unit operation)



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)

A. Emission Unit Description: Ormond Beach Unit 2			B. Pollutant: NH3
C. Measured Emission Rate: 1.3 ppm	D. Limited Emission Rate: 10.ppm	E. Specific Source Test or Monitoring Record Citation: Attachment 59N1, Condition 3	F. Test Date: 08/27/2010

A. Emission Unit Description: Ormond Beach North Auxiliary Boiler			B. Pollutant: NOx
C. Measured Emission Rate: 0.028 lb/mmBtu	D. Limited Emission Rate: 0.040 lb/mmBtu	E. Specific Source Test or Monitoring Record Citation: Attachment 59N3, Condition 1	F. Test Date: 03/14/2010 @ 1400 (CEMS data)

A. Emission Unit Description: Ormond Beach South Auxiliary Boiler			B. Pollutant: NOx
C. Measured Emission Rate: 0.027 lb/mmBtu	D. Limited Emission Rate: 0.040 lb/mmBtu	E. Specific Source Test or Monitoring Record Citation: Attachment 59N3, Condition 1	F. Test Date: 03/14/2010 @ 1400 (CEMS data)



## ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

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

<b>A. Attachment # or Permit Condition #:</b>  Attachment 59N1, Condition 3	<b>B. Equipment description:</b>  Ormond Unit 1	<b>C. Deviation Period: Date &amp; Time</b> Begin: <u>Aug 1, 2010</u>  End: <u>Sep 21, 2010</u> When Discovered: Date & Time  <u>Sep 21, 2010</u>
<b>D. Parameters monitored:</b> NH3	<b>E. Limit:</b> 10 ppm	<b>F. Actual:</b> 1 ppm
<b>G. Probable Cause of Deviation:</b> 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.		<b>H. Corrective actions taken:</b> 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 5 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.

<b>A. Attachment # or Permit Condition #:</b>  Attachment 59N1, Condition 3	<b>B. Equipment description:</b>  Ormond Unit 2	<b>C. Deviation Period: Date &amp; Time</b> Begin: <u>Aug 1, 2010</u>  End: <u>Aug 27, 2010</u> When Discovered: Date & Time  <u>Aug 27, 2010</u>
<b>D. Parameters monitored:</b> NH3	<b>E. Limit:</b> 10 ppm	<b>F. Actual:</b> 1.3 ppm
<b>G. Probable Cause of Deviation:</b> 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.		<b>H. Corrective actions taken:</b> 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 11 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.



## ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

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

<b>A. Attachment # or Permit Condition #:</b>  Attachment 59N3, Condition 1	<b>B. Equipment description:</b>  Ormond North Auxiliary Boiler	<b>C. Deviation Period: Date &amp; Time</b> Begin: <u>Apr 18, 2010 @ 14:11</u>  End: <u>Apr 18, 2010 @ 14:32</u> When Discovered: Date & Time  <u>Apr 18, 2010 ~1500</u>
<b>D. Parameters monitored: NOx</b>	<b>E. Limit: 0.040 lb/mmBtu</b>	<b>F. Actual: 0.048 lb/mmBtu</b>
<b>G. Probable Cause of Deviation: Brief period of imbalance in re-circulated flue gas due to low-load level of auxiliary boiler operation and lack of response from flue gas recirculation flow control dampers.</b>		<b>H. Corrective actions taken: The event occurred as the auxiliary boiler unit was being ramped down for shutdown after Unit 2 start-up. After approximately 15 minutes of attempting to increase the level of operation of the auxiliary boiler in order to increase flue gas recirculation flow and manually adjusting dampers to reduce NOx, the unit was shutdown. The APCD was timely notified. Adjustments and repairs to the flow control dampers were made before the next period of north auxiliary boiler operation.</b>

<b>A. Attachment # or Permit Condition #:</b>  Attachment 103N3, Condition 2	<b>B. Equipment description:</b>  Ormond South Auxiliary Boiler	<b>C. Deviation Period: Date &amp; Time</b> Begin: <u>Mar 14, 2010 @ 07:19</u>  End: <u>Mar 14, 2010 @ 08:35</u> When Discovered: Date & Time  <u>Mar 14, 2010 ~07:19</u>
<b>D. Parameters monitored: NOx</b>	<b>E. Limit N/A</b>	<b>F. Actual: N/A</b>
<b>G. Probable Cause of Deviation: Failed CEMS calibration due to bad vacuum pump.</b>		<b>H. Corrective actions taken: The vacuum pump was replaced and the CEM system was successfully recalibrated.</b>



## ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

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

A. Attachment # or Permit Condition #:  Attachment 70N3-65, Condition 2	B. Equipment description:  Ormond Beach gasoline tank	C. Deviation Period: Date & Time Begin: <u>unknown</u> End: <u>Dec 4, 2010</u> When Discovered: Date & Time <u>unknown</u>
D. Parameters monitored: N/A	E. Limit: N/A	F. Actual: N/A
G. Probable Cause of Deviation: Missing cap on the Phase I vapor recovery line fixture on the gasoline storage tank. It is believed that a gasoline delivery driver inadvertently did not reinstall the cap after transferring gasoline into the storage tank.		H. Corrective actions taken: A new cap was ordered immediately upon discovery and installed when received the next day. The new cap has been outfit with a tether in order to prevent it from being removed from the immediate vicinity of the tank. Regular visual inspections are being conducted to ensure the cap is in place as required.



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

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

Ormond Beach Generating Station

<p>A. Attachment # or Permit Condition #: Attachment 59N1, Condition #1</p>	<p>D. Frequency of monitoring: Continuous</p>
<p>B. Description: NOx Emission Limit</p> <p>Condition 1a – Certified CEMS data demonstrates that there have been no exceedances of the 0.10 lbs/mw-hr limit.</p> <p>Condition 1b – RRI Energy is prohibited from burning fuel oil in these units. None was burned during the compliance certification time period.</p> <p>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></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>

<p>A. Attachment # or Permit Condition #: Attachment 59N1, Condition #2</p>	<p>D. Frequency of monitoring: Continuous</p>
<p>B. Description: Oil Burned During Force Majeure</p> <p>Ormond Beach 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></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>

<p>A. Attachment # or Permit Condition #: Attachment 59N1, Condition #3</p>	<p>D. Frequency of monitoring: Continuous</p>
<p>B. Description: NH3 Emissions</p> <p>The Annual Ammonia Slip Tests for Units 1 and 2 were conducted on 09/21/10 and 08/27/10, respectively. The ammonia slip limit is 10 ppm - Unit 1 tested at 1.0 ppm, Unit 2 tested at 1.3 ppm. APCD extended the July 31 test deadline to September 30, nevertheless, the fact that the Units 1 and 2 tests were 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></p> <p>G. Compliance Status? (C or I): <u>I</u></p> <p>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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Ormond Beach Generating Station

<p>A. Attachment # or Permit Condition #: Attachment 59N1, Condition #4</p>	<p>D. Frequency of monitoring: Continuous</p>
<p>B. Description: Cold Start-up waiver for NOx and NH3 Emission Limits</p> <p>There were 8 Unit 1 start-ups during the compliance period. There were 8 Unit 2 start-ups during the compliance period.</p> <p>Plant records indicate that no cold start-up lasted more than 20 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></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>

<p>A. Attachment # or Permit Condition #: Attachment 59N1, Condition #5</p>	<p>D. Frequency of monitoring: Continuous</p>
<p>B. Description: NOx lbs/MW-Hr</p> <p>Condition 5a - CEMs are used to monitor and calculate the NOx emission rate.</p> <p>Condition 5b - The megawatt metering calibration test occurs annually.</p> <p>Condition 5c - The hourly lb/MW-hr NOx is measured according to the procedures in 40 CFR 75.10(d)(1).</p> <p>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></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>

<p>A. Attachment # or Permit Condition #: Attachment 59N1, Conditions #6 &amp; #7</p>	<p>D. Frequency of monitoring: Continuous</p>
<p>B. Description: Hourly Recordkeeping</p> <p>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></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>





## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

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Ormond Beach Generating Station

<p><b>A. Attachment # or Permit Condition #:</b> Attachment 59N3, Condition #1</p>	<p><b>D. Frequency of monitoring:</b> Continuous</p>
<p><b>B. Description:</b> NOx Limits (Aux Boilers) 0.040 lbs/MMBTU Certified CEMS data demonstrates that there was a single exceedance of the 0.040 lb/mmBtu limit. The District was timely notified and a follow-up report submitted as required.</p>	<p><b>E. Source test reference method, if applicable.</b> Attach Source Test Summary Form, if applicable N/A</p>
<p><b>C. Method of monitoring:</b> CEMs Records and Emission Calculations</p>	<p><b>F. Currently in Compliance?</b> (Y or N): <u>Y</u></p> <p><b>G. Compliance Status?</b> (C or I): <u>I</u></p> <p><b>H. *Excursions, exceedances, or other non-compliance?</b> (Y or N): <u>Y</u> *If yes, attach Deviation Summary Form</p>

<p><b>A. Attachment # or Permit Condition #:</b> Attachment 59N3, Condition #2</p>	<p><b>D. Frequency of monitoring:</b> Continuous</p>
<p><b>B. Description:</b> Cold Start-up, NOx Emission Limits There were 15 North Auxiliary Boiler cold starts and 18 South Auxiliary Boiler cold starts during the compliance period. These units are subject to a 4-hour NOx emission exemption period.</p>	<p><b>E. Source test reference method, if applicable.</b> Attach Source Test Summary Form, if applicable N/A</p>
<p><b>C. Method of monitoring:</b> CEMs Records and Operator Logs</p>	<p><b>F. Currently in Compliance?</b> (Y or N): <u>Y</u></p> <p><b>G. Compliance Status?</b> (C or I): <u>C</u></p> <p><b>H. *Excursions, exceedances, or other non-compliance?</b> (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p><b>A. Attachment # or Permit Condition #:</b> Attachment 59N3, Condition #3</p>	<p><b>D. Frequency of monitoring:</b> Continuous</p>
<p><b>B. Description:</b> NOx Limits (Aux Boilers) calculation method Hourly natural gas emissions figures are calculated as required by this permit condition.</p>	<p><b>E. Source test reference method, if applicable.</b> Attach Source Test Summary Form, if applicable N/A</p>
<p><b>C. Method of monitoring:</b> CEMs Records and Emission Calculations</p>	<p><b>F. Currently in Compliance?</b> (Y or N): <u>Y</u></p> <p><b>G. Compliance Status?</b> (C or I): <u>C</u></p> <p><b>H. *Excursions, exceedances, or other non-compliance?</b> (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

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Ormond Beach Generating Station

<p>A. Attachment # or Permit Condition #: Attachment 59N3, Conditions #4 - #5</p>	<p>D. Frequency of monitoring: Continuous</p>
<p>B. Description: Record keeping Daily and hourly records are maintained as 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: 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>

<p>A. Attachment # or Permit Condition #: Attachment 70N3-65, Conditions #1 - #2</p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: Phase 1 &amp; 2 Vapor Recovery System  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 equipment is maintained in good condition. The cap for the vapor return line was missing from the tank for a period of time. See attached Deviation Summary form for detail.</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>  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>

<p>A. Attachment # or Permit Condition #: Attachment 70N3-65, Conditions #3 - #6</p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: Phase 1 &amp; 2 Vapor Recovery System  Condition 3-4 - Phase II dispensing equipment is a VRS vapor balance system.  Condition 5 – Required signs are posted and readily visible.  Condition 6 – The site conducts static testing every two years 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>  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

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

Ormond Beach Generating Station

<p><b>A. Attachment # or Permit Condition #:</b> Attachment 70N3-65, Conditions #7 - #8</p>	<p><b>D. Frequency of monitoring:</b></p> <p style="text-align: center;">Periodic</p>
<p><b>B. Description:</b> Phase 1 &amp; 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><b>E. Source test reference method, if applicable.</b> Attach Source Test Summary Form, if applicable</p> <p style="text-align: center;">N/A</p>
<p><b>C. Method of monitoring:</b> Inspection, Maintenance, and Testing Records</p>	<p><b>F. Currently in Compliance?</b> (Y or N): <u>Y</u></p> <p><b>G. Compliance Status?</b> (C or I): <u>C</u></p> <p><b>H. *Excursions, exceedances, or other non-compliance?</b> (Y or N): <u>N</u></p> <p style="text-align: center;">*If yes, attach Deviation Summary Form</p>

<p><b>A. Attachment # or Permit Condition #:</b> Attachment 74.9N7, Conditions #1 - #4</p>	<p><b>D. Frequency of monitoring:</b></p> <p style="text-align: center;">Periodic</p>
<p><b>B. Description:</b> Stationary Internal Combustion Engines</p> <p>Condition 1 - Hourly operating records verify compliance with the 50 hour annual limit.</p> <p>Condition 2 - A non-resettable elapsed hour meter is operated on the unit.</p> <p>Condition 3 - The Cummins model NTA 855-G5 emergency generator is located in the emergency generator building next to (south of) the admin building.</p> <p>Condition 4 - Calendar year hours of maintenance operation are reported by Feb 15.</p>	<p><b>E. Source test reference method, if applicable.</b> Attach Source Test Summary Form, if applicable</p> <p style="text-align: center;">N/A</p>
<p><b>C. Method of monitoring:</b> Maintenance and Operating Logs</p>	<p><b>F. Currently in Compliance?</b> (Y or N): <u>Y</u></p> <p><b>G. Compliance Status?</b> (C or I): <u>C</u></p> <p><b>H. *Excursions, exceedances, or other non-compliance?</b> (Y or N): <u>N</u></p> <p style="text-align: center;">*If yes, attach Deviation Summary Form</p>

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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

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

Ormond Beach Generating Station

<p>A. Attachment # or Permit Condition #: Attachment 103N1-65, 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. There were no breakdowns or other deviations that are subject to 103N1, Condition 2. 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>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Attachment 103N1-65, 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>

<p>A. Attachment # or Permit Condition #: Attachment 103N3-65, 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. One event subject to 103N3, Condition 2 is 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><b>A. Attachment # or Permit Condition #:</b> Attachment 103N3-65, Conditions #4 - #6</p>	<p><b>D. Frequency of monitoring:</b> Continuous</p>
<p><b>B. Description:</b> Continuous Monitoring Systems Condition 4 – Permanent CEMS records are maintained as required. Condition 5 – Data is reduced as required by the condition. Condition 6 - CEMS and excess emission reports are submitted to the District monthly.</p>	<p><b>E. Source test reference method, if applicable.</b> Attach Source Test Summary Form, if applicable N/A</p>
<p><b>C. Method of monitoring:</b> CEMs Inspection, Maintenance, Testing, and Reporting Records</p>	<p><b>F. Currently in Compliance?</b> (Y or N): <u>Y</u> <b>G. Compliance Status?</b> (C or I): <u>C</u> <b>H. *Excursions, exceedances, or other non-compliance?</b> (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p><b>A. Attachment # or Permit Condition #:</b> PO00065PC1-231, Conditions #1 - #2</p>	<p><b>D. Frequency of monitoring:</b> Continuous</p>
<p><b>B. Description:</b> General Recordkeeping Requirements and Solvent Cleaning Additional Requirements Condition 1 - Monthly record-keeping of permitted throughput and consumption, including fuel consumption, are maintained onsite. Condition 2 - Ormond Beach only uses cleaning products in nonrefillable aerosol cans. Records are maintained onsite.</p>	<p><b>E. Source test reference method, if applicable.</b> Attach Source Test Summary Form, if applicable N/A</p>
<p><b>C. Method of monitoring:</b> Rules 26 and 29 Fuel Throughput/Consumption and Rule 29 Solvent Usage Records</p>	<p><b>F. Currently in Compliance?</b> (Y or N): <u>Y</u> <b>G. Compliance Status?</b> (C or I): <u>C</u> <b>H. *Excursions, exceedances, or other non-compliance?</b> (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p><b>A. Attachment # or Permit Condition #:</b> PO00065PC2, Conditions #1 - #2, #5</p>	<p><b>D. Frequency of monitoring:</b> Continuous</p>
<p><b>B. Description:</b> Rule 26 Permitted Throughput and Consumption Limit for Unit 1 and 2, Aux. Boilers and Rule 29 Natural Gas Only Requirement Conditions 1, 2 - Monthly and rolling 12-month records are maintained onsite. Conditions 3, 4 - Units 1 and 2 and the north and south auxiliary boilers only fire natural gas. Condition 5 - Emissions and fuel records and source test reports are maintained onsite.</p>	<p><b>E. Source test reference method, if applicable.</b> Attach Source Test Summary Form, if applicable N/A</p>
<p><b>C. Method of monitoring:</b> Fuel Usage, Emission Records, and Test Reports</p>	<p><b>F. Currently in Compliance?</b> (Y or N): <u>Y</u> <b>G. Compliance Status?</b> (C or I): <u>C</u> <b>H. *Excursions, exceedances, or other non-compliance?</b> (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



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

<p><b>A. Attachment # or Permit Condition #:</b> Attachment 54.B.1, Conditions #1 - #3</p>	<p><b>D. Frequency of monitoring:</b> Periodic</p>
<p><b>B. Description:</b> 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><b>E. Source test reference method, if applicable.</b> Attach Source Test Summary Form, if applicable N/A</p>
<p><b>C. Method of monitoring:</b> Fuel Sulfur Analyses</p>	<p><b>F. Currently in Compliance?</b> (Y or N): <u>Y</u> <b>G. Compliance Status?</b> (C or I): <u>C</u> <b>H. *Excursions, exceedances, or other non-compliance?</b> (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p><b>A. Attachment # or Permit Condition #:</b> Attachment 54.B.2, Conditions #1 - #3</p>	<p><b>D. Frequency of monitoring:</b> Annually</p>
<p><b>B. Description:</b> Sulfur Compounds Ground Level Units 1, 2, and the auxiliary boilers 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 back-up generator.</p>	<p><b>E. Source test reference method, if applicable.</b> Attach Source Test Summary Form, if applicable N/A</p>
<p><b>C. Method of monitoring:</b> Recordkeeping and Modeling Demonstration</p>	<p><b>F. Currently in Compliance?</b> (Y or N): <u>Y</u> <b>G. Compliance Status?</b> (C or I): <u>C</u> <b>H. *Excursions, exceedances, or other non-compliance?</b> (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:</p> <p>Periodic</p>
<p>B. Description: Fugitive Dust</p> <p>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></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Attachment 57.1, Conditions #1 - #2</p>	<p>D. Frequency of monitoring:</p> <p>Continuous</p>
<p>B. Description: Particulate Emissions from Fuel Burning Equipment</p> <p>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></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>

<p>A. Attachment # or Permit Condition #: Attachment 64.B.1, Conditions #1 - #4</p>	<p>D. Frequency of monitoring:</p> <p>Continuous</p>
<p>B. Description: Sulfur Content of Gaseous Fuels</p> <p>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></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 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. Fuel purchase records are maintained onsite for District review; delivery record is attached confirming use of CARB-certified fuels.</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 and Gasoline 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>

<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 Ormond Beach 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>

<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:</p>
<p>B. Description: Natural gas Fired Fan-type Central Furnaces</p> <p>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>N/A</p>
<p>C. Method of monitoring: Equipment Design Record Review - Permit Condition Not Currently Applicable</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p> <p>N/A</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>

<p>A. Attachment # or Permit Condition #: Attachment 74.1, Conditions #1 - #7</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Abrasive Blasting</p> <p>Bead blast records are available for review at the plant.</p>	<p>Periodic</p>
<p>C. Method of monitoring: Operating Log Records; Routine Surveillance of Bead Blaster</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p> <p>N/A</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>

<p>A. Attachment # or Permit Condition #: Attachment 74.2, Conditions #1 - #6</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Architectural Coatings</p> <p>Facility maintains records of paints used and VOC content for District review.</p>	<p>Continuous</p>
<p>C. Method of monitoring: Routine Surveillance of Paint Usage, and Activity Records</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p> <p>N/A</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 74.29N3, Conditions #1 - #14</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Soil Decontamination Operations No soil remediation is taking place at the Ormond Beach Generating Station.</p>	<p>N/A</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>

<p>A. Attachment # or Permit Condition #: Attachment 40CFR61.M, Conditions #1 - #2</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Asbestos Standard Inspection, Notification, and Contractor Records are maintained onsite.</p>	<p>Periodic</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>

<p>A. Attachment # or Permit Condition #: Attachment Part 70 General, Conditions #1 - #4</p>	<p>D. Frequency of monitoring:</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 - 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</p>	<p>Continuous</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 #5 - #7</p>	<p>D. Frequency of monitoring: Continuous</p>
<p>B. Description: General Part 70 Permit Conditions</p> <p>Condition 5 - All required records, monitoring data, and support information are maintained for a period of 5 years.</p> <p>Condition 6 - Facility furnishes information to District when requested.</p> <p>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></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>

<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</p> <p>Condition 8 - Facility understands that the permit may be modified, revoked, reopened, reissued, or terminated for cause</p> <p>Condition 9 - Facility understands that the permit may be reopened by the District under specific conditions.</p> <p>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></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>

<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</p> <p>Condition 11 - Facility recognizes that the permit does not provide any specific property rights.</p> <p>Condition 12 - Facility recognizes that the permit provisions are severable.</p> <p>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></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 Part 70 General, Conditions #14 - #15</p>	<p>D. Frequency of monitoring: Continuous</p>
<p>B. Description: General Part 70 Permit Conditions</p> <p>Condition 14 - Facility recognizes that any document submitted on behalf of this permit must be certified by a responsible official.</p> <p>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></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>

<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</p> <p>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.</p> <p>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></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>

<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</p> <p>Condition 3 - Facility recognizes that equipment that is not permitted as portable is not transferable from one location to another</p> <p>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></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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<b>A. Attachment # or Permit Condition #:</b> Attachment SHIELD - D, Da, Db	<b>D. Frequency of monitoring:</b> Continuous
<b>B. Description:</b> Permit Shield - New Source Performance Standards Facility periodically reviews applicability of identified NSPS subparts	<b>E. Source test reference method, if applicable.</b> Attach Source Test Summary Form, if applicable N/A
<b>C. Method of monitoring:</b> Periodic Review of Potentially Applicable Requirements	<b>F. Currently in Compliance?</b> (Y or N): <u>Y</u> <b>G. Compliance Status?</b> (C or I): <u>C</u> <b>H. *Excursions, exceedances, or other non-compliance?</b> (Y or N): <u>N</u> *If yes, attach Deviation Summary Form

<b>A. Attachment # or Permit Condition #:</b> Attachment 40CFR68RMP-65	<b>D. Frequency of monitoring:</b> Annually
<b>B. Description:</b> Risk Management Plan The site has a current and complete Risk Management Plan.	<b>E. Source test reference method, if applicable.</b> Attach Source Test Summary Form, if applicable N/A
<b>C. Method of monitoring:</b> Risk Management Plan Documentation and Review	<b>F. Currently in Compliance?</b> (Y or N): <u>Y</u> <b>G. Compliance Status?</b> (C or I): <u>C</u> <b>H. *Excursions, exceedances, or other non-compliance?</b> (Y or N): <u>N</u> *If yes, attach Deviation Summary Form

<b>A. Attachment # or Permit Condition #:</b> Attachment 40CFR72-7B	<b>D. Frequency of monitoring:</b> Continuous
<b>B. Description:</b> Acid Rain Program Facility maintains records to ensure compliance with monitoring, emission limits, recordkeeping, and reporting requirements.	<b>E. Source test reference method, if applicable.</b> Attach Source Test Summary Form, if applicable N/A
<b>C. Method of monitoring:</b> Periodic Review of Requirements	<b>F. Currently in Compliance?</b> (Y or N): <u>Y</u> <b>G. Compliance Status?</b> (C or I): <u>C</u> <b>H. *Excursions, exceedances, or other non-compliance?</b> (Y or N): <u>N</u> *If yes, attach Deviation Summary Form



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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>

<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>

<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>



Silvas Oil Company, Inc.  
Independent Petroleum Distributor

CORPORATE OFFICE  
2121 So. Third St.  
P.O. Box 1048 • Fresno, CA 93714  
(559) 233.5171 • www.silvasoil.com

ExxonMobil ConocoPhillips



PLEASE RETURN REMITTANCE TO  
ADDRESS ABOVE

ACCOUNT NUMBER: 2236

DELIVERY INVOICE

NUMBER: 149618  
DATE: 02-16-10

450128475Z

SOLD TO: RRI ENERGY ORMOND BEACH, INC.

SHIP TO: RRI ENERGY ORMOND BEACH, INC.

ORMOND BEACH  
6635 S. EDISON DRIVE  
OXNARD, CA 93033

ORMOND BEACH  
6635 S. EDISON DRIVE  
OXNARD, CA 93033

STATEMENTS ON THE REVERSE SIDE ARE MADE A PART HEREOF		PURCH. ORDER NUMBER 32050234	
DELIVERED BY (SIGNATURE IN FILE) X	RECEIVED BY (GOOD ORDER) X	This invoice amount due on: 03-03-10	
NET 15			
<p>DIESEL FUEL - 3, NA1993, PG III CAB (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 NEEDS TODAY PLZ.... FOR EMERGENCY RESPONSE CALL 1-559-994-5200 SG AR 78005744</p>			
SALESMAN - 20		PLACARD	YES <input type="checkbox"/> NO <input type="checkbox"/>
124.43			
ERRORS IN PRICE, EXTENSION AND ADDITION SUBJECT TO CORRECTION.		1546.43	
BAKERSFIELD 661.589.5620	FRESNO 559.233.5171	HANFORD 559.582.0221	KINGSBURG 559.897.5117
OXNARD 805.486.4581	PORTERVILLE 559.784.3017	SAN LUIS OBISPO 805.782.9201	SANTA MARIA 805.926.7676

"Shift Up To Silvas Oil"

ORIGINAL



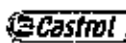
Silvas Oil Company, Inc.  
Independent Petroleum Distributor

CORPORATE OFFICE  
2121 So. Third St.  
P.O. Box 1048 • Fresno, CA 93714  
(559) 233.6171 • www.silvasoil.com

ExxonMobil **76** ConocoPhillips



**JAX**



PLEASE RETURN REMITTANCE TO  
ADDRESS ABOVE

ACCOUNT NUMBER: 2236

DELIVERY INVOICE

NUMBER: 153930

DATE: 07-08-10

SOLD TO: RRI ENERGY ORMOND BEACH, INC.

SHIP TO: RRI ENERGY ORMOND BEACH, INC.

ORMOND BEACH  
6635 S. EDISON DRIVE  
OXNARD, CA 93033

ORMOND BEACH  
6635 S. EDISON DRIVE  
OXNARD, CA 93033

4501304368

STATEMENTS ON THE REVERSE SIDE ARE MADE A PART HEREOF		PURCH. ORDER NUMBER		4600015493		
DELIVERED BY (SIGNATURE IN FIELD)		RECEIVED IN GOOD ORDER		This invoice amount due on: 07-23-10		
<i>[Signature]</i>		<i>[Signature]</i>		NET 15		
GASOLINE - 3. UNLEADED, PG II		500	500	T T T	2.60200	1569. <sup>50</sup>
97 UNLEADED CARB/RFG 10% ETH					0.18300	
FEDERAL GASOLINE EXCISE TAX					0.35300	
CA GAS EXCISE					0.00100	
FEDERAL LUST TAX						
FOR EMERGENCY RESPONSE CALL 1-559-994-5200						
SB AR 78005744						
UNLEADED - REFORMULATED NONVOC CONTROLLED, NON-OPRG, CERTIFIED UNDER SIMPLE MODEL STANDARDS, RUP C9 MAX., OXYGEN WT. %1.5 TO 2.7 (14.9 OJ MTBE MAX) BENZENE VOL. 1.3 MAX. DETERGENT-ADITIFIED CRONITE 000 477						
"Shell Up To Silvas Oil"						
SALESMAN - 20		PLACARD		YES <input type="checkbox"/> NO <input type="checkbox"/>		43.16
PROMS DELIVERED		PROMS RECEIVED		PROMS NET		
ERRORS IN PRICE, EXTENSION AND ADDITION SUBJECT TO CORRECTION.						1612.66
BAKERSFIELD 661.589.5620	FRESNO 559.233.6171	HANFORD 559.582.0221	KINGSBURG 559.897.5117	OXNARD 805.488.4581	PORTERVILLE 559.784.3017	SAN LUIS OBISPO 805.782.9201
						SANTA MARIA 805.925.7676

ORIGINAL





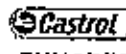
Silvas Oil Company, Inc.  
Independent Petroleum Distributor

CORPORATE OFFICE  
2121 So. Third St.  
P.O. Box 1048 • Fresno, CA 93714  
(559) 233-5171 • www.silvasoil.com

ExxonMobil ConocoPhillips



JAX



DELIVERY INVOICE

PLEASE RETURN REMITTANCE TO  
ADDRESS ABOVE

ACCOUNT NUMBER: 2236

NUMBER: 146151

DATE: 10-12-09

SOLD TO: RRI ENERGY ORMOND BEACH, INC.

SHIP TO: RRI ENERGY ORMOND BEACH, INC.

ORMOND BEACH  
6635 S. EDISON DRIVE  
OXNARD, CA 93033

ORMOND BEACH  
6635 S. EDISON DRIVE  
OXNARD, CA 93033

4501266980

STATEMENTS ON THE REVERSE SIDE ARE MADE A PART HEREOF		PURCH. ORDER NUMBER		4600016493	
DELIVERED BY (SIGNATURE IN FULL)		RECEIVED IN GOOD ORDER		NET 15	
x <i>[Signature]</i>		x <i>[Signature]</i>		This invoice amount due on: 10-27-09	
GASOLINE - 3, UN1203, PG II UNLEADED 87 CARFG3 5.7% ETH FEDERAL GASOLINE EXCISE TAX CA GAS EXCISE FEDERAL LUST TAX		600	600	T	T
FOR EMERGENCY RESPONSE CALL 1-559-994-5200 SG AR 78005744					
UNLEADED - REFORMULATED NON VOC CONTROLLED, NON-OPRG, CERTIFIED UNDER SIMILAR MODEL STANDARDS, CRUP 2.8 MAX., OXYGEN WT. % 1.5 TO 2.7 (14.9 VOL. MTBE MAX) BENZENE VOL. 1.3 MAX. DETERGENT-ADDITIZED ORGNITE OGA 477					
SALESMAN - 20		PLACARD		YES <input type="checkbox"/>	NO <input type="checkbox"/>
				143.80	
ERRORS IN PRICE, EXTENSION AND ADDITION SUBJECT TO CORRECTION.				1787.20	
BAKERSFIELD 861.583.5620	FRESNO 559.233.5171	HANFORD 559.582.0221	KINGSBURG 559.897.5117	OXNARD 805.486.4581	PORTERVILLE 559.784.3017
				SAN LUIS OBISPO 805.782.9201	
				SANTA MARIA 805.925.7478	

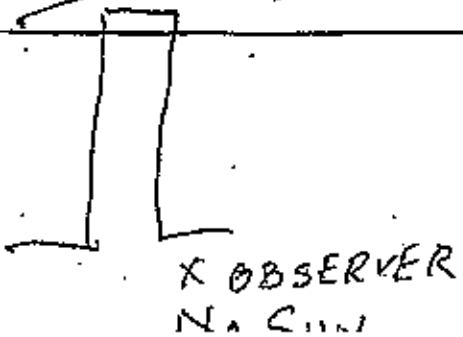
ORIGINAL

RECORD OF VISIBLE EMISSIONS

Client/Location ORMOND NORTH AUX. BLR Date 9/17/10  
 Unit NAB Fuel NAT. GAS Test No. 1 Observer M. ESCARREGA  
 Weather Conditions 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							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						09	46	0	0	0	0
	17							47	0	0	0	0
	18							48	0	0	0	0
	19							49	0	0	0	0
	20							50	3	0	5	0
	21							51	0	5	0	0
	22							52	5	0	0	0
	23							53				
	24							54				
	25							55				
	26							56				
	27							57				
	28							58				
	29							59				

Comments/Notes: STACK HEIGHT = 75 FT.  
READINGS FROM X 200 FT AWAY.  
STEAM FLOW ≈ 7 KLB/HR → WIND

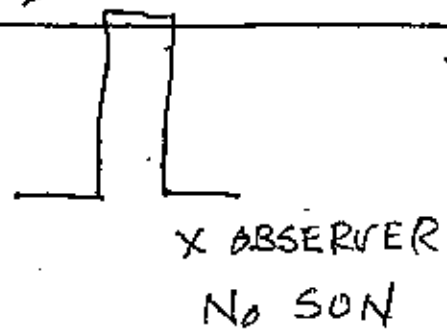


RECORD OF VISIBLE EMISSIONS

Client/Location ORMOND SOUTH AUX. BLR. Date 9/17/10  
 Unit SAB Fuel NAT. GAS. Test No. 1 Observer M. ESCARCEGA  
 Weather Conditions CLOUDY WIND 5-10 mph  
 Observer's Location SEE SKETCH BELOW

Time					Comments	Time					Comments	
Hr	Min	Seconds				Hr	Min	Seconds				
		00	15	30	45			00	15	30	45	
	00							30				
10	01	0	0	0	0			31				
	02	0	0	0	0			32				
	03	0	0	0	0			33				
	04	0	0	5	0			34				
	05	0	5	0	5			35				
	06	0	5	5	0			36				
	07	0	5	5	0			37				
	08							38				
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	20							50				
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	22							52				
	23							53				
	24							54				
	25							55				
	26							56				
	27							57				
	28							58				
	29							59				

Comments/Notes: STACK HEIGHT = 75 FT.  
READINGS FROM ~ 800 FT AWAY :-  
STEAM FLOW X 6 KLB/HR → WIND



2010 ORMOND BEACH  
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/CAP100\\_1.htm](http://www.arb.ca.gov/CAP100_1.htm)

Night Recert: [http://www.arb.ca.gov/CAP100\\_2.htm](http://www.arb.ca.gov/CAP100_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

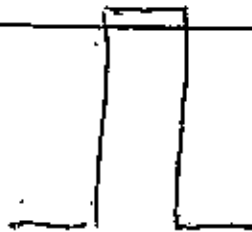
<b>Michael Escarcega</b>		Student ID. # 14859
Is certified as a visible emission evaluator based on the score achieved and the criteria established by the U.S. EPA Reference Method 9		
Certification expires: <b>10/13/2010</b>		
<i>Michael Escarcega</i> Authorized Signee		
Certified for: 100.1 Average Dev: White Black		
100.2 Day Sun Glasses: 2.8 White 4.6 Black		
100.2 Night		

## RECORD OF VISIBLE EMISSIONS

Client/Location ORMOND UNIT 1 Date 8/25/10  
 Unit 1 Fuel NAT GAS Test No. 1 Observer M. ESCARCEGA  
 Weather Conditions MOSTLY CLOUDY WIND ~ 10-20 MPH  
 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	<del>0</del>	<del>0</del>	<del>0</del>	<del>0</del>	
01						31	<del>0</del>	<del>0</del>	<del>0</del>	<del>0</del>	
02						32	<del>0</del>	<del>0</del>	<del>0</del>	<del>0</del>	
03						33					
04						34					
05						35					
06						36					
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12						42					
13						43					
14						44					
15						45					
16						46					
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20						50					
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23						53					
24						54					
25						55					
26						56					
27	<del>0</del>	<del>0</del>	<del>0</del>	<del>0</del>		57					
28	<del>0</del>	<del>0</del>	<del>0</del>	<del>0</del>		58					
29	<del>0</del>	<del>0</del>	<del>0</del>	<del>0</del>		59					

Comments/Notes: STACK HEIGHT = STACK HT. ~ 200 FT.  
WIND



X OBSERVER  
 X SUN

RECORD OF VISIBLE EMISSIONS

Client/Location ORMOND UNIT 2 Date 8/18/2010

Unit 2 Fuel NAT. GAS Test No. 1 Observer M. ESCARCEGA

Weather Conditions CLEAR WIND 10-15 MPH

Observer's Location SEE SKETCH BELOW

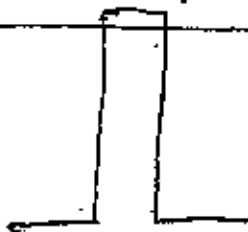
Time					Comments	Time					Comments	
Hr	Min	Seconds				Hr	Min	Seconds				
		00	15	30				45	00	15		30
	00											
	01											
	02											
	03											
	04											
	05											
	06											
	07											
	08											
	09											
	10											
	11					07	40	0	0	0	0	
	12						41	0	0	0	0	
	13						42	0	0	0	0	
	14						43	0	0	0	0	
	15						44	0	0	0	0	
	16						45	0	0	0	0	
	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.

READINGS FROM ~ 500 FT.

LOAD ~ 55 NET MW

WIND



X OBSERVER  
R SON

RECORD OF VISIBLE EMISSIONS

Client/Location ARMOND EMERGENCY DIESEL GEN. Date 8/30/10

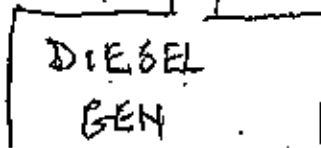
Unit \_\_\_\_\_ Fuel DIESEL Test No. 1 Observer M. ESCARCEGA

Weather Conditions CLEAR WIND 0-5 mph

Observer's Location SEE SKETCH BELOW

Time					Comments	Time					Comments	
Hr	Min	Seconds				Hr	Min	Seconds				
		00	15	30		45			00	15		30
	00							30				
	01							31				
	02							32				
	03							33				
	04							34				
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	22							52				
	23							53				
09	24	5	5	5	0			54				
	25	5	5	5	10			55				
	26	5	10	5	5			56				
	27	5	5	5	10			57				
	28	5	5	5	5			58				
	29	5	5	10	5			59				

Comments/Notes: STACK HEIGHT = 15 FT WALL  
READINGS FROM 20 FT AWAY EXHAUST



X  
OBSERVER

RECORD OF VISIBLE EMISSIONS

Client/Location ORMOND BEAD BLASTER Date 8/30/10

Unit 1 Fuel ELEC. Test No. 1 Observer M. ESCARCEGA

Weather Conditions N/A

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											
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	09					08	38					
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	23						52					
	24						53					
	25						54					
	26						55					
	27						56					
	28						57					
	29						58					
							59					

Comments/Notes: STACK HEIGHT = 7 FT  
READINGS FROM INSIDE BLDG.



OBSERVER



RECORD OF VISIBLE EMISSIONS

HONDA GX390

Client/Location ORMOND PORTABLE WELDER Date 8/30/10

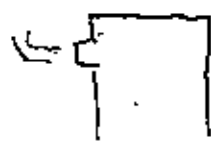
Unit \_\_\_\_\_ Fuel GASOLINE Test No. 1 Observer M. ESCARCEGA

Weather Conditions CLEAR - NO WIND

Observer's Location SEE SKETCH BELOW

Time					Comments	Time						
Hr	Min	Seconds				Hr	Min	Seconds				
		00	15	30		45			00	15	30	45
	00											
	01											
	02					08	31	0	0	0	0	
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	29						58					
							59					

Comments/Notes: STACK HEIGHT = 2 FT



✗ OBSERVER

RECORD OF VISIBLE EMISSIONS

Client/Location 13 HP ORMOND VANGUARD DEWATER PUMP Date 8/30/10  
 Unit \_\_\_\_\_ Fuel \_\_\_\_\_ Test No. \_\_\_\_\_ Observer M. ESCARCEGA  
 Weather Conditions \_\_\_\_\_  
 Observer's Location SEE SKETCH BELOW

Time					Comments	Time							
Hr	Min	Seconds				Hr	Min	Seconds			Comments		
		00	15	30		45			00	15		30	45
	00												
	01												
	02												
	03												
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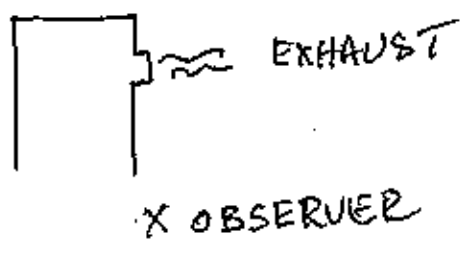
Comments/Notes: STACK HEIGHT =

RECORD OF VISIBLE EMISSIONS

Client/Location HONDA GX 240  
ORMOND DEWATER PUMP Date 8/30/10  
 Unit \_\_\_\_\_ Fuel GASOLINE Test No. 1 Observer M. ESCARCEGA  
 Weather Conditions CLEAR NO WIND  
 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				
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	19					108		49	0	0	0	0
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	23							53	0	0	0	0
	24							54	0	0	0	0
	25							55				
	26							56				
	27							57				
	28							58				
	29							59				

Comments/Notes: STACK HEIGHT = 18"



NEW

RECORD OF VISIBLE EMISSIONS

BRIGGS & STRATTON AMT 525 SERIES

Client/Location ORMOND DEWATER PUMP Date 8/30/10

Unit 1 Fuel GASOLINE Test No. 1 Observer M. ESCARCEGA

Weather Conditions CLEAR NO WIND

Observer's Location SEE SKETCH BELOW

Time					Comments	Time					Comments
Hr	Min	Seconds				Hr	Min	Seconds			
		00	15	30	45			00	15	30	45
09	00	<del>0</del>	<del>0</del>	<del>0</del>	<del>0</del>						
	01	<del>0</del>	<del>0</del>	<del>0</del>	<del>0</del>						
	02	<del>0</del>	<del>0</del>	<del>0</del>	<del>0</del>						
	03	<del>0</del>	<del>0</del>	<del>0</del>	<del>0</del>						
	04										
	05										
	06										
	07										
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	22										
	23										
	24										
	25										
	26										
	27										
	28					08	58	<del>0</del>	<del>0</del>	<del>0</del>	<del>0</del>
	29						59	<del>0</del>	<del>0</del>	<del>0</del>	<del>0</del>

Comments/Notes: STACK HEIGHT = 2 FT



X OBSERVER