



Mandalay Generating Station
393 N. Harbor Blvd.
Oxnard, CA 93035
Tel: (805) 984-5291
Fax: (805) 984-5295

November 07, 2012

Mr. Lyle Olson
Ventura County Air Pollution Control District
669 County Square Drive
Ventura, CA 93003

RE: 2011-2012 Annual Compliance Certification
GenOn West, LP. - Mandalay Generating Station - Permit No. 00013

Dear Mr. Olson,

GenOn West, LP. is submitting the 2011-12 annual compliance certification report for the Mandalay Generating Station (Federal Operating Permit No. 00013 issued October 28, 2008) located in Oxnard, CA.

Please find enclosed VCAPCD Signature Cover Form- Certification by Responsible Official, Source Test Summary Form, Deviation Summary Form, Permit Attachment Form and supporting documents. These documents serve as the annual certification for the period October 01, 2011 through September 30, 2012, and semi-annual deviation report for the period April 01, 2012 through September 30, 2012.

If you have any questions or require additional information, please don't hesitate to contact me at (909) 782-8834 or apeetha.jain@genon.com

Sincerely,

Apeetha Jain
Air Environmental Specialist

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

Enclosures

RECEIVED
VENTURA COUNTY
12 NOV -8 PM 1:42
A.P.C.D.



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.

<p>Signature and Title of Responsible Official:</p>  <p>Title: Vice President – California Plant Operations</p>	<p>Date:</p> <p>November 7, 2012</p>
--	--

<p>Time Period Covered by Compliance Certification</p> <p><u>10</u> / <u>01</u> / <u>2011</u> (MM/DD/YY) to <u>09</u> / <u>30</u> / <u>2012</u> (MM/DD/YY)</p> <p>GenOn West LP, Mandalay Generating Station</p>
--



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 10 / 01 / 2011 (MM/DD/YY) to 09 / 30 / 2012 (MM/DD/YY)

A. Emission Unit Description: Mandalay Unit 1			B. Pollutant: NOx
C. Measured Emission Rate: 0.006 lb/mmBtu (0.072 lb/NMWh)	D. Limited Emission Rate: 0.10 lb / NMWh	E. Specific Source Test or Monitoring Record Citation: Attachment 59N2, Condition 1	F. Test Date: 09/14/2011 (This data is from most recent CEMS RATA test, none has been required since due to infrequent operations)

A. Emission Unit Description: Mandalay Unit 1			B. Pollutant: NH3
C. Measured Emission Rate: 3.4 ppm	D. Limited Emission Rate: 10 ppm	E. Specific Source Test or Monitoring Record Citation: Attachment 59N2, Condition 3	F. Test Date: 07/10/2012

A. Emission Unit Description: Mandalay Unit 2			B. Pollutant: NOx
C. Measured Emission Rate: 0.006 lb/mmBtu (0.068 lb/NMWh)	D. Limited Emission Rate: 0.10 lb / NMWh	E. Specific Source Test or Monitoring Record Citation: Attachment 59N2, Condition 1	F. Test Date: 10/06/2011

A. Emission Unit Description: Mandalay 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 59N2, Condition 3	F. Test Date: 08/06/2012

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 / 2011 (MM/DD/YY) to 09 / 30 / 2012 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Attachment 59N2, Condition #1</p>	<p>B. Equipment description: Mandalay Unit 2</p>	<p>C. Deviation Period: Date & Time Begin: <u>May 6, 2012 @ 14:00</u> End: <u>May 6, 2012 @ 15:00</u> When Discovered: Date & Time <u>May 7, 2012 @ 15:00</u></p>
<p>D. Parameters monitored: NOx</p>	<p>E. Limit: 0.10 lb/NMWhr</p>	<p>F. Actual: 0.109 lb/NMWhr</p>
<p>G. Probable Cause of Deviation: The 24-hour rolling NOx excess emissions was caused due to an ammonia feed pump breakdown on May 6, 2012 and gas flow regulator problems on April 24 & 25, 2012. The increased hourly NOx emissions were due to these breakdowns resulting in a 24-hour rolling NOx emissions above the permit limit.</p>		<p>H. Corrective actions taken: The ammonia feed pump was repaired and gas regulator parts were replaced. VCAPCD was notified of the incident and a detailed breakdown and corrective actions report was submitted on May 10, 2012.</p>

<p>A. Attachment # or Permit Condition #: Attachment 103N1-13, Conditions # 2</p>	<p>B. Equipment description: Mandalay Unit 2 CEMS</p>	<p>C. Deviation Period: Date & Time Begin: <u>April 21, 2012 @ 9:46</u> End: <u>April 22, 2012 @ 19:45</u> When Discovered: Date & Time <u>April 21, 2012 @ 17:32</u></p>
<p>D. Parameters monitored: Gas Flow</p>	<p>E. Limit: N/A</p>	<p>F. Actual: N/A</p>
<p>G. Probable Cause of Deviation: CEMS fuel flow computer was not recording gas flow data.</p>		<p>H. Corrective actions taken: The fuel flow computer was reconfigured that resolved the problem. The district was notified and the unit was shut down. This event did not result in NOx exceedance. Detailed CEMS breakdown follow-up report was submitted to the district on April 24, 2012.</p>

<p>A. Attachment # or Permit Condition #: Attachment 103N1-13, Conditions # 2</p>	<p>B. Equipment description: Mandalay Unit 2 CEMS</p>	<p>C. Deviation Period: Date & Time Begin: <u>September 10, 2012 @ 0:00</u> End: <u>September 11, 2012 @ 16:00</u> When Discovered: Date & Time <u>September 10, 2012 @ 03:53</u></p>
<p>D. Parameters monitored: Gas Flow</p>	<p>E. Limit: N/A</p>	<p>F. Actual: N/A</p>
<p>G. Probable Cause of Deviation: CEMS fuel flow computer was not recording gas flow data due to defective circuit board.</p>		<p>H. Corrective actions taken: The fuel flow computer was reconfigured; the defective circuit board and bad power supply were both replaced. The district was notified and the event did not result in a NOx exceedance. Detailed CEMS breakdown follow-up report was submitted to the district on September 13, 2012.</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 10 / 01 / 2011 (MM/DD/YY) to 09 / 30 / 2012 (MM/DD/YY)

Mandalay Generating Station

<p>A. Attachment # or Permit Condition #: Attachment 59N2, 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 one exceedances of the 0.10 lbs/NMW-hr limit. Exceedance event caused due to breakdown conditions is reported on attached Devaition summary form.</p> <p>Condition 1b – GenOn is prohibited from burning fuel oil in these units. None was burned during the compliance certification time period.</p> <p>Condition 1c – GenOn 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>I</u></p> <p>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 59N2, Condition #2</p>	<p>D. Frequency of monitoring: Continuous</p>
<p>B. Description: Oil Burned During Force Majeure</p> <p>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></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 59N2, 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 07/10/2012 and 08/06/2012, respectively. The ammonia slip limit is 10 ppm - Unit 1 tested at 3.4 ppm, Unit 2 tested at 1.3 ppm.</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>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

Period Covered by Compliance Certification: 10 / 01 / 2011 (MM/DD/YY) to 09 / 30 / 2012 (MM/DD/YY)

Mandalay Generating Station

<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 38 Unit 1 start-ups during the compliance period. There were 70 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>

<p>A. Attachment # or Permit Condition #: Attachment 59N2, Condition #5</p>	<p>D. Frequency of monitoring: Continuous</p>
<p>B. Description: NOx lbs/NMW-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/NMW-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>

<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>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 10 / 01 / 2011 (MM/DD/YY) to 09 / 30 / 2012 (MM/DD/YY)

Mandalay Generating Station

<p>A. Attachment # or Permit Condition #: Attachment 70N3-13, Conditions #1 - #2</p>	<p>D. Frequency of monitoring:</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 I vapor recovery equipment has a two-point VRS system and a permanently installed submerged fill pipe. The VRS equipment is maintained in good condition.</p>	<p>Periodic</p>
<p>C. Method of monitoring: Inspection, Maintenance, and Testing Records</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable 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 70N3-13, Conditions #3 - #6</p>	<p>D. Frequency of monitoring:</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>Periodic</p>
<p>C. Method of monitoring: Inspection, Maintenance, and Testing Records</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable 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 70N3-13, Conditions #7 - #8</p>	<p>D. Frequency of monitoring:</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 – GenOn agrees that if it seeks replacement or modification of the dispensing facility it will seek a permit to construct.</p>	<p>Periodic</p>
<p>C. Method of monitoring: Inspection, Maintenance, and Testing Records</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable 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>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 10 / 01 / 2011 (MM/DD/YY) to 09 / 30 / 2012 (MM/DD/YY)

Mandalay Generating Station

<p>A. Attachment # or Permit Condition #: Attachment 74.9N7, Conditions #1 - #4</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: 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 each unit.</p> <p>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.</p> <p>Condition 4 - Calendar year hours of maintenance operation are reported by Feb 15.</p>	<p>Periodic</p>
<p>C. Method of monitoring: Maintenance and Operating Logs</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable 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 ATCM Engine N1, Conditions #1 - #3</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: 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 fire pump is logged monthly</p> <p>Condition 3 - Records of operation and fuel purchased (type and quantity) are maintained on site</p>	<p>Periodic</p>
<p>C. Method of monitoring: Purchase Records and Operation Log</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable 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 ATCM Engine N2, Conditions #1 - #3</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: 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>Periodic</p>
<p>C. Method of monitoring: Purchase Records and Operation Log</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable 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>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 10 / 01 / 2011 (MM/DD/YY) to 09 / 30 / 2012 (MM/DD/YY)

Mandalay Generating Station

<p>A. Attachment # or Permit Condition #: Attachment 74.23N8, Conditions #1 - #3</p>	<p>D. Frequency of monitoring:</p> <p>Continuous</p>
<p>B. Description: Stationary Gas Turbines</p> <p>Condition 1 - A totalizing operating hour meter is installed; monthly records of operating hours are maintained.</p> <p>Condition 2 - Unit 3 operated 70 hours in calendar year 2011 and 87.2 hours during the Oct 2011 - Sept 2012 compliance year.</p> <p>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></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 103N1-13, Conditions #1 - #3</p>	<p>D. Frequency of monitoring:</p> <p>Continuous</p>
<p>B. Description: Continuous Monitoring Systems</p> <p>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 103N1-13 Condition 2 are reported on the attached Deviation forms.</p> <p>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></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></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Attachment 103N1-13, Conditions #4 - #6</p>	<p>D. Frequency of monitoring:</p> <p>Continuous</p>
<p>B. Description: Continuous Monitoring Systems</p> <p>Condition 4 - Permanent CEMS records are maintained as required.</p> <p>Condition 5 - Data is reduced according to Appendix F of 40 CFR Part 75.</p> <p>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></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

Period Covered by Compliance Certification: 10 / 01 / 2011 (MM/DD/YY) to 09 / 30 / 2012 (MM/DD/YY)

Mandalay Generating Station

<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 72.6 mmcf of natural gas during the Oct 2011 - Sept 2012 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>*If yes, attach Deviation Summary Form</p>

<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>*If yes, attach Deviation Summary Form</p>

<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>*If yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 10 / 01 / 2011 (MM/DD/YY) to 09 / 30 / 2012 (MM/DD/YY)

Mandalay Generating Station

<p>A. Attachment # or Permit Condition #: Attachment 54.B.1, Conditions #1 - #3</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Sulfur Compounds</p> <p>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>Periodic</p>
<p>C. Method of monitoring: Fuel Sulfur Analyses</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable 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 54.B.2, Conditions #1 - #3</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Sulfur Compounds Ground Level</p> <p>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>Annually</p>
<p>C. Method of monitoring: Recordkeeping and Modeling Demonstration</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable 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 55, Conditions #1 - #7</p>	<p>D. Frequency of monitoring:</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>Periodic</p>
<p>C. Method of monitoring: Onsite Operations Review - Permit Condition Not Currently Applicable</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable 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>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 10 / 01 / 2011 (MM/DD/YY) to 09 / 30 / 2012 (MM/DD/YY)

Mandalay Generating Station

<p>A. Attachment # or Permit Condition #: Attachment 57.1, Conditions #1 - #2</p>	<p>D. Frequency of monitoring:</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>Continuous</p>
<p>C. Method of monitoring: Rule 57.B District Analysis</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable 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> *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>B. Description: Sulfur Content of Gaseous Fuels Only PUC-regulated Natural Gas is combusted at this facility. Records are available on site.</p>	<p>Continuous</p>
<p>C. Method of monitoring: Fuel Sulfur Analyses</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable 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> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Attachment 64.B.2, Conditions #1 - #3</p>	<p>D. Frequency of monitoring:</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>Continuous</p>
<p>C. Method of monitoring: CARB Diesel Purchase Records</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable 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> *If yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 10 / 01 / 2011 (MM/DD/YY) to 09 / 30 / 2012 (MM/DD/YY)

Mandalay Generating Station

<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>

<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>

<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

Period Covered by Compliance Certification: 10 / 01 / 2011 (MM/DD/YY) to 09 / 30 / 2012 (MM/DD/YY)

Mandalay Generating Station

<p>A. Attachment # or Permit Condition #: Attachment 74.1, Conditions #1 - #7</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Abrasive Blasting Bead blast records are available for review at the plant.</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: Operating Log Records; Routine Surveillance of Bead Blaster</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 Facility maintains records of paints used and VOC content for District review.</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: Routine Surveillance of Paint Usage, and Activity 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>

<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 Mandalay 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></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

Period Covered by Compliance Certification: 10 / 01 / 2011 (MM/DD/YY) to 09 / 30 / 2012 (MM/DD/YY)

Mandalay Generating Station

<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>

<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>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 #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

Period Covered by Compliance Certification: 10 / 01 / 2011 (MM/DD/YY) to 09 / 30 / 2012 (MM/DD/YY)

Mandalay Generating Station

<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>

<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>

<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>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 10 / 01 / 2011 (MM/DD/YY) to 09 / 30 / 2012 (MM/DD/YY)

Mandalay Generating Station

<p>A. Attachment # or Permit Condition #: Attachment PO General, Conditions #1 - #2</p>	<p>D. Frequency of monitoring:</p> <p style="margin-left: 20px;">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</p> <p style="margin-left: 20px;">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 style="margin-left: 20px;">*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:</p> <p style="margin-left: 20px;">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</p> <p style="margin-left: 20px;">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 style="margin-left: 20px;">*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></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="margin-left: 20px;">*If yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 10 / 01 / 2011 (MM/DD/YY) to 09 / 30 / 2012 (MM/DD/YY)

Mandalay Generating Station

<p>A. Attachment # or Permit Condition #: Attachment SHIELD - D, Da, Db</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Permit Shield - New Source Performance Standards Facility periodically reviews applicability of identified NSPS subparts</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: Periodic Review of Potentially Applicable 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 SHIELD - GG</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Permit Shield - New Source Performance Standards Facility periodically reviews applicability of identified NSPS subparts</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: Periodic Review of Potentially Applicable 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 SHIELD - YYYY</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Permit Shield - National Emissions Standards for Hazardous Air Pollutants Facility periodically reviews applicability of identified NESHAP subparts</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: Periodic Review of Potentially Applicable 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>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 10 / 01 / 2011 (MM/DD/YY) to 09 / 30 / 2012 (MM/DD/YY)

Mandalay Generating Station

<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>

<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>

<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>

2012 MANDALAY G.S. ANNUAL
TITLE V OPACITY TESTING



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

Michael Escarcega Student I.D. # **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: **7/20/2012**


James R. Ryden, Chief

1/19/2012

Course Date



Certified for: **100.1** Average Dev: White Black
100 1 Day
100 2 Night w/Sun Glasses: **4** White **4.2** Black

RECORD OF VISIBLE EMISSIONS

Client/Location MANDALAY UNIT 1 Date 2/2/12

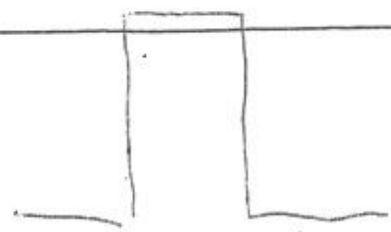
Unit 1 Fuel NAT. GAS Test No. 1 Observer M. ESCARCEGA

Weather Conditions CLEAR WIND ≈ 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							46				
	17							47				
	18							48				
	19							49				
	20							50				
09	21	0	0	0	0			51				
	22	0	0	0	0			52				
	23	0	0	0	0			53				
	24	0	0	0	0			54				
	25	0	0	0	0			55				
	26	0	0	0	0			56				
	27	0	0	0	0			57				
	28							58				
	29							59				

Comments/Notes: STACK HEIGHT = 200 FT.
READINGS FROM 3-STR. HTS. AWAY ← WIND
LOAD ≈ 51 MW



X OBSERVER
 JF KIN

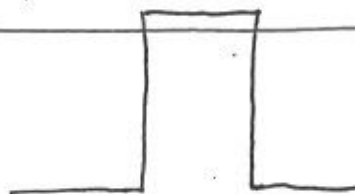
RECORD OF VISIBLE EMISSIONS

Client/Location MANDALAY UNIT 3 Date 6/27/12
 Unit 1 & 2 PAIR Fuel NAT. GAS 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	45	
	00							30				
	01							31				
	02							32				
	03							33				
	04							34				
	05							35				
	06						08	36	0	0	0	0
	07							37	0	0	0	0
	08							38	0	0	0	0
	09							39	0	0	0	0
	10							40	0	0	0	0
	11							41	0	0	0	0
	12							42	0	0	0	0
	13							43	0	0	0	0
	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 \approx 1.5' FT AWAY. ← WIND



X OBSERVER

X SUN

RECORD OF VISIBLE EMISSIONS

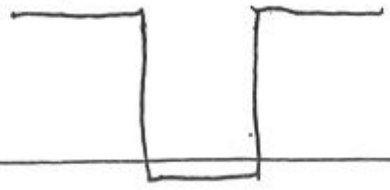
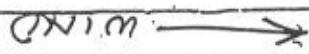
Client/Location MANDALAY UNIT 3 Date 6/27/12
 Unit 3 & 4 PAIR FUEL NAT. GAS Test No. 1 Observer M. ESCARCEGA
 Weather Conditions CLEAR WIND 0-5 MPH
 Observer's Location SEE SKETCH BELOW

Hr	Min	Seconds	Comments	Time			
				Hr	Min	Seconds	Comments
00	00	00		00	15	30	45

00							
01							
02							
03			08				
04			0.5 0.0				
05			0.0 0.0				
06			0.4 5.0				
07			0.0 0.0				
08			0.0 0.0				
09			0.0 0.0				
10			0.0 0.0				
11			0.0 0.0				
12			0.0 0.0				
13			0.0 0.0				
14			0.0 0.0				
15			0.0 0.0				
16			0.0 0.0				
17			0.0 0.0				
18			0.0 0.0				
19			0.0 0.0				
20			0.0 0.0				
21			0.0 0.0				
22			0.0 0.0				
23			0.0 0.0				
24			0.0 0.0				
25			0.0 0.0				
26			0.0 0.0				
27			0.0 0.0				
28			0.0 0.0				
29			0.0 0.0				

Comments/Notes: STACK HEIGHT = 50 FT.

READINGS FROM 2 150 FT. WEAVY



X OBSERVER

JE SUK

RECORD OF VISIBLE EMISSIONS

Client/Location MANDALAY SALT FIREWATER PUMP Date 6/27/12

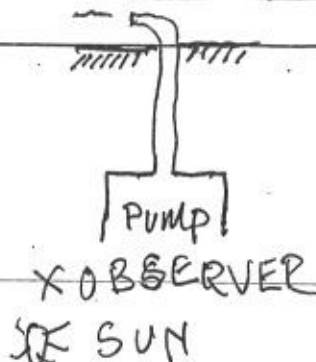
Unit _____ Fuel DIESEL Test No. 1 Observer M. ESCARCEGA

Weather Conditions CLEAR 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											
	01						09	31	5	5	5	5
	02							32	0	0	5	0
	03							33	0	5	0	5
	04							34	5	0	0	5
	05							35	0	5	0	5
	06							36	5	0	5	5
	07							37	5	5	0	0
	08							38				
	09							39				
	10							40				
	11							41				
	12							42				
	13							43				
	14							44				
	15							45				
	16							46				
	17							47				
	18							48				
	19							49				
	20							50				
	21							51				
	22							52				
	23							53				
	24							54				
	25							55				
	26							56				
	27							57				
	28							58				
	29							59				

Comments/Notes: STACK HEIGHT = 5 FT WIND
READINGS FROM ~ 2.5 FT AWAY



RECORD OF VISIBLE EMISSIONS

Client/Location MANDALAY DIESEL AUX. GEN. Date 6/27/12

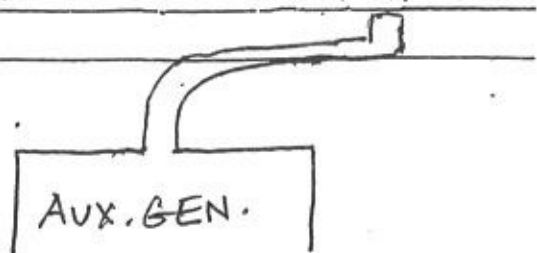
Unit _____ Fuel DIESEL Test No. 1 Observer M. ESCARCEGA

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	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						09	42	0	5	0	5
	13							43	0	0	0	0
	14							44	0	5	0	0
	15							45	0	0	0	0
	16							46	5	0	0	0
	17							47	0	0	5	0
	18							48	0	0	5	0
	19							49				
	20							50				
	21							51				
	22							52				
	23							53				
	24							54				
	25							55				
	26							56				
	27							57				
	28							58				
	29							59				

Comments/Notes: STACK HEIGHT = 10 FT. → WIND
READINGS FROM 30 FT. AWAY ↗ EXHAUST



X OBSERVER
 R SUN

RECORD OF VISIBLE EMISSIONS

Client/Location MANDALAY BEAD BLASTER Date 6/27/12

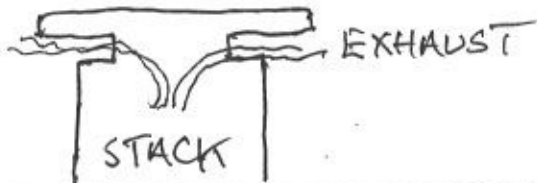
Unit _____ Fuel ELEC. Test No. 1 Observer M. ESCARCEGA

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							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				
	17							47				
	18							48				
	19							49				
	20							50				
	21							51				
	22							52				
	23					09	53	0	0	0	0	
	24						54	0	0	0	0	
	25						55	0	0	0	0	
	26						56	0	0	0	0	
	27						57	0	0	0	0	
	28						58	0	0	0	0	
	29						59	0	0	0	0	

Comments/Notes: STACK HEIGHT = 8 FT.
READINGS FROM ~ 20 FT. AWAY. → WIND



X OBSERVER
 ☉ SUN

RECORD OF VISIBLE EMISSIONS

Client/Location MANDALAY UNIT 2 Date 5/21/12

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

Weather Conditions CLOUDY - NO SUN WIND 10-15 mph

Observer's Location SEE SKETCH BELOW

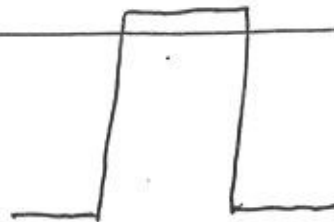
Time					Comments	Time					Comments	
Hr	Min	Seconds				Hr	Min	Seconds				
		00	15	30		45			00	15		30
	00							30				
	01							31				
	02							32				
	03							33				
	04							34				
	05							35				
	06							36				
	07							37				
	08							38				
	09							39				
	10							40				
	11							41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

Comments/Notes: STACK HEIGHT ≈ 200 FT.

READINGS FROM ≈ 500 FT. AWAY.

LOAD ≈ 50 MW

← WIND



NOTE: NO SUN

✶ OBSERVER



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



PLEASE RETURN REMITTANCE TO
ADDRESS ABOVE

ACCOUNT NUMBER: 2478

INVOICE

NUMBER: 180588

DATE: 09-07-12

SOLD TO: GEN-ON ENERGY, INC.

SHIP TO: GEN-ON 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				4600016493		
DELIVERED BY (SIGNATURE IN FULL)		RECEIVED IN GOOD ORDER		This invoice amount due on:						
X		X		NET 15 09-22-12						
NO. OF PKG'S	BULK OR PKG. SIZE	PRODUCT DELIVERED	ORDERED	DELIVERED	TAXES			PRICE	AMOUNT	
					FED	STATE	SALES			
		GASOLINE - 3, UN1203, PG II 87 UNLEADED CARB/RFG 10% ETH FEDERAL GASOLINE EXCISE TAX CA GAS EXCISE FEDERAL LUST TAX	500	500	T	T	T	3.56800	1,784.00	
				500				0.18300	91.50	
				500				0.36000	180.00	
				500				0.00100	0.50	
FOR EMERGENCY RESPONSE CALL 1-559-994-5200										
SG AR 78005744										
PG. 4501422642										
UNLEADED - REFORMULATED NON VOC CONTROLLED, NON-OPRG, CERTIFIED UNDER SIMPLE MODEL STANDARDS, RVP 7.8 MAX., OXYGEN WT. %1.5 TO 2.7 (14.9 VOL. MTBE MAX) BENZENE VOL. 1.3 MAX., DETERGENT-ADDITIZED ORONITE OGA 477 PL.										
SALESMAN - 20				PLACARD		YES <input type="checkbox"/> NO <input type="checkbox"/>		SALES TAX ▶ 2.750		56.54
DRUMS DELIVERED ▶			DRUMS RETURNED ▶			DRUMS NET ▶				
ERRORS IN PRICE, EXTENSION AND ADDITION SUBJECT TO CORRECTION.								TOTAL ▶		2,112.54
BAKERSFIELD 661.589.5620		FRESNO 559.233.5171		HANFORD 559.582.0221		KINGSBURG 559.897.5117		OXNARD 805.486.4581		PORTERVILLE 559.784.3017
SANTA MARIA 805.925.7676										



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



PLEASE RETURN REMITTANCE TO
ADDRESS ABOVE

ACCOUNT NUMBER: 2478

4501407244

INVOICE

NUMBER: 176465

DATE: 05-17-12

SOLD TO: GEN-ON ENERGY, INC.

SHIP TO: GEN-ON 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 4600016493				
DELIVERED BY (SIGNATURE IN FULL) X			RECEIVED IN GOOD ORDER X		This invoice amount due on: 06-01-12				
					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 DYED DIESEL FUEL, NONTAXABLE USE ONLY, PENALTY FOR TAXABLE USE. FEDERAL LUST TAX	467	467			T	3.48900	1,629.36
				467				0.00100	0.47
FOR EMERGENCY RESPONSE CALL 1-559-994-5200 SG AR 78005744									
SALESMAN - 20			PLACARD		YES <input type="checkbox"/>	NO <input type="checkbox"/>	SALES TAX ▶ 7.750		126.31
DRUMS DELIVERED ▶		DRUMS RETURNED ▶		DRUMS NET ▶					
ERRORS IN PRICE, EXTENSION AND ADDITION SUBJECT TO CORRECTION.								TOTAL ▶	1,756.14
BAKERSFIELD • 661.589.5620 FRESNO • 559.233.5171 HANFORD • 559.582.0221 KINGSBURG • 559.897.5117 OXNARD • 805.486.4581 PORTERVILLE • 559.784.3017 SANTA MARIA • 805.925.7676									



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



PLEASE RETURN REMITTANCE TO
ADDRESS ABOVE

ACCOUNT NUMBER: 2478

4501396215

INVOICE

NUMBER: 173939

DATE: 03-08-12

SOLD TO: GEN-ON ENERGY, INC.

SHIP TO: GEN-ON 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			4600016493	
DELIVERED BY (SIGNATURE IN FULL)			RECEIVED IN GOOD ORDER			This invoice amount due on:			
X			X			NET 15 03-23-12			
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 DYED DIESEL FUEL, NONTAXABLE USE ONLY, PENALTY FOR TAXABLE USE. FEDERAL LUST TAX	400	400			T	3.85900	1,543.60
				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 ▶ 7.750		119.66
DRUMS DELIVERED ▶		DRUMS RETURNED ▶		DRUMS NET ▶					
ERRORS IN PRICE, EXTENSION AND ADDITION SUBJECT TO CORRECTION.								TOTAL ▶ 1,663.66	
BAKERSFIELD 661.589.5620 • FRESNO 559.233.5171 • HANFORD 559.582.0221 • KINGSBURG 559.897.5117 • OXNARD 805.486.4581 • PORTERVILLE 559.784.3017 • SANTA MARIA 805.925.7676									



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 **76** ConocoPhillips



PLEASE RETURN REMITTANCE TO
ADDRESS ABOVE

ACCOUNT NUMBER: 2478

4501391990

INVOICE

NUMBER: 173012

DATE: 02-13-12

SOLD TO: GEN-ON ENERGY, INC.

SHIP TO: GEN-ON 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 4600016493					
DELIVERED BY (SIGNATURE IN FULL) X			RECEIVED IN GOOD ORDER X		This invoice amount due on: 02-28-12					
					NET 15					
NO. OF PKG'S	BULK OR PKG. SIZE	PRODUCT DELIVERED	ORDERED	DELIVERED	TAXES			PRICE	AMOUNT	
					FED	STATE	SALES			
		GASOLINE - 3, UN1203, PG II 87 UNLEADED CARB/RFG 10% ETH FEDERAL GASOLINE EXCISE TAX CA GAS EXCISE FEDERAL LUST TAX	387	387 387 387 387	T	T	T	3.38800 0.18300 0.35700 0.00100	1,311.15 70.82 138.16 0.39	
FOR EMERGENCY RESPONSE CALL 1-559-994-5200 SG AR 78005744										
UNLEADED - REFORMULATED NON VOC CONTROLLED, NON-OPRG, CERTIFIED UNDER SIMPLE MODEL STANDARDS, RVP 7.8 MAX., OXYGEN WT. %1.5 TO 2.7 (14.9 VOL. MTBE MAX) BENZENE VOL. 1.3 MAX., DETERGENT-ADDITIZED ORONITE OGA 477 PL.										
SALESMAN - 20			PLACARD		YES <input type="checkbox"/>		NO <input type="checkbox"/>		SALES TAX ▶ 2.750	41.81
DRUMS DELIVERED ▶		DRUMS RETURNED ▶		DRUMS NET ▶						
ERRORS IN PRICE, EXTENSION AND ADDITION SUBJECT TO CORRECTION.								TOTAL ▶		1,562.33
BAKERSFIELD • FRESNO • HANFORD • KINGSBURG • OXNARD • PORTERVILLE • SANTA MARIA 661.589.5620 • 559.233.5171 • 559.582.0221 • 559.897.5117 • 805.486.4581 • 559.784.3017 • 805.925.7676										



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 76 **ConocoPhillips**



PLEASE RETURN REMITTANCE TO
ADDRESS ABOVE

ACCOUNT NUMBER: 2478

4501376441

INVOICE NUMBER: 169670

DATE: 11-01-11

SOLD TO: GEN-ON ENERGY, INC.

SHIP TO: GEN-ON 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 4600016493				
DELIVERED BY (SIGNATURE IN FULL) X		RECEIVED IN GOOD ORDER X		This invoice amount due on: 11-16-11					
NET 15									
NO. OF PKG'S	BULK OR PKG. SIZE	PRODUCT DELIVERED	ORDERED	DELIVERED	TAXES			PRICE	AMOUNT
					FED	STATE	SALES		
		GASOLINE - 3, UN1203, PG II 87 UNLEADED CARB/RFG 10% ETH FEDERAL GASOLINE EXCISE TAX CA GAS EXCISE FEDERAL LUST TAX	400	400	T	T	T	3.40800	1,363.20
				400				0.18300	73.20
				400				0.35700	142.80
				400				0.00100	0.40
FOR EMERGENCY RESPONSE CALL 1-559-994-5200 SG AR 78005744									
UNLEADED + REFORMULATED NON VOC CONTROLLED, NON-OPRG, CERTIFIED UNDER SIMPLE MODEL STANDARDS, RVP 7.8 MAX., OXYGEN WT. %1.5 TO 2.7 (14.9 VOL. MTBE MAX) BENZENE VOL. 1.3 MAX., DETERGENT-ADDITIZED ORONITE OGA 477 PL.									
SALESMAN - 20			PLACARD		YES <input type="checkbox"/> NO <input type="checkbox"/>		SALES TAX ▶ 2.750		43.44
DRUMS DELIVERED ▶		DRUMS RETURNED ▶		DRUMS NET ▶					
ERRORS IN PRICE, EXTENSION AND ADDITION SUBJECT TO CORRECTION.								TOTAL ▶ 1,623.04	
BAKERSFIELD • 661.589.5620 FRESNO • 559.233.5171 HANFORD • 559.582.0221 KINGSBURG • 559.897.5117 OXNARD • 805.486.4581 PORTERVILLE • 559.784.3017 SANTA MARIA • 805.925.7676									

FORM 1

Summary of Source Test Data

SOURCE INFORMATION		FACILITY PARAMETERS		
GDF Name and Address LONDON MANDALAY 393 HARBOR BLVD DUWARD	GDF Representative and Title 393 HARBOR BLVD JLOTT	PHASE II SYSTEM TYPE (Check One)		
Permit Conditions	Source: GDF Vapor Recovery System	Balance	<input checked="" type="checkbox"/>	
	GDF # _____	Hirt	_____	
	A/C # _____	Red Jacket	_____	
		Hasstech	_____	
		Healy	_____	
		Other	_____	
		Manufactured	Y or <input checked="" type="checkbox"/> N	
Operating Parameters				
Number of Nozzles Served by Tank #1 <u>1</u>		Number of Nozzles Served by Tank #3 _____		
Number of Nozzles Served by Tank #2 _____		Number of Nozzles Served by Tank #4 _____		
Applicable Regulations:		VN Recommended:		
Source Test Results and Comments				
TANK #:	1	2	3	4
1. Product Grade	87UNI			
2. Actual Tank Capacity, gallons	1000			
3. Gasoline Volume	448 800			
4. Ullage, gallons (#2, #3)	552			
5. Initial Pressure, inches H ₂ O	2.0			
6. Pressure After 1 Minute, inches H ₂ O	1.97			
7. Pressure After 2 Minutes, inches H ₂ O	1.94			
8. Pressure After 3 Minutes, inches H ₂ O	1.92			
9. Pressure After 4 Minutes, pressure H ₂ O	1.89			
10. Final Pressure After 5 Minutes, H ₂ O	1.87			
11. Allowable Final Pressure	0.50			
Test Conducted by:	Test Company:	Date of Test:		
Smokey Robles	PSR	3-26-12		

APCD Inspector on Site

LRD TEST ZERO

APCD INSPECTOR RECEIVED ONE COPY OF DATA

20

GENERATING STATION HIGH ACCURACY ELECTRONIC WATT-HOUR METER TEST

Single Phase
Poly Phase

WORK ORDER #:

LOCATION: MANDALAY GEN. STATION SERIAL #: 21228
 MANUFACTURER: SCI COL. MODEL: 6680 VOLTS: 120 SA NOMINAL ANALOG: 1.0 mA
 WATTS: 1000 PHASE: 3 ELEMENT: 2 WIRE: 3 PULSE/HOUR: 1920 Ke: 19200 MULTIPLIER: 19200
 P.T RATIO: 120/1 C.T. RATIO: 300/5 STD. SER. NO.: STD. Ke: STD. WATTS:
 STD. ELE.:

START OF TEST
 TIME: 1320 hrs
 WATT DISPLAY: 0.03
 WATT-HOUR COUNT: 603538

END OF TEST
 TIME: 1435 hrs
 WATT DISPLAY: 0.03
 WATT-HOUR COUNT: 603410

TEST DATA

NOMINAL SETTINGS				DIGITAL OUTPUT			ANALOG OUTPUT			WATTS DISPLAY						
Sec. Volts	Sec. Amps	P.F.	TM Coll	Run Pulses	RO Count	Standard Count		IND %E	TRUE %E	UT mA	STD sid. mA	IND. %E	Display Watts	STD. Watts	IND. %E	TRUE %E
						Run #1	Run #2									
120	5.0	1.0								1.20		0.16	F.S.	229.3	600	
120	4.16	1.0		320	1MIN					1.00		0.14	F.S.	191.1	500.00	
120	2.50	1.0								0.60		0.15	F.S.	114.64	300	
120	2.08	1.0								0.60		0.15	F.S.	95.51	249.9	
120	1.04	1.0								0.25		0.15	F.S.	47.76	125.04	
120	0.50	1.0								0.12		0.15	F.S.	22.87	60.0	
120	0	1.0								0		-	0	0	0	

AS FOUND / AS LEFT

COMMENTS:

ARTES II 440 TEST SET

Test Tech: Jim Samuel 805) 986-7294
 Contact Information:
 Signed: Date: 12/10/2011
 SECURED UNIT

GENERATING STATION HIGH ACCURACY ELECTRONIC WATT-HOUR METER TEST

Single Phase	<input checked="" type="checkbox"/>
Poly Phase	<input type="checkbox"/>

LOCATION: MANDALAY G. STATION WORK ORDER #: _____
 MANUFACTURER: SCI COL MODEL: 6680 SERIAL #: 2122A
 WATTS: 1000 PHASE: 3 ELEMENT: 0 NOMINAL ANALOG: 1.0 mA
 P.T. RATIO: 120/1 C.T. RATIO: 300/5 WIRE: 3 VOLTS: 120 SA PULSE/HOUR: 19200 Ke: _____
 STD. ELE.: _____ STD. SER. NO.: _____ STD. mA: _____
 MULTIPLIER: 19200 STD. WATTS: _____

START OF TEST TIME: 07:55:10
 END OF TEST TIME: 10:30:10
 WATT DISPLAY: 0.02
 WATT-HOUR COUNT: 797430

TEST DATA

NOMINAL SETTINGS				DIGITAL OUTPUT			ANALOG OUTPUT			WATTS DISPLAY					
Sec. Volts	Sec. Amps	P.F.	TM Coil	Run Pulses	RO Count	Standard Count		UT mA	STD std. mA	IND. % E	TRUE % E	Display Watts	STD. Watts	IND. % E	TRUE % E
						Run #1	Run #2								
120	5.0	1.0						1.2		0.42	15	230.3	600		
120	4.167	1.0		520	1MIN			1.0		0.40	15	192.05	500.04		
120	2.50	1.0						0.8		0.39	15	115.2	300		
120	3.083	1.0						0.5		0.35	15	96.0	249.96		
120	1.042	1.0						0.25		0.32	15	48.04	125.14		
120	0.50	1.0						0.13		0.35	15	23.04	60.0		
120	0	1.0						0		0		0	0		

AS FOUND / AS LEFT

COMMENTS:

ARTS II 440 TEST SET

Test Tech: Jim Samuel Signed: Jim Samuel Date: 12/10/2011
 Contact Information: 805) 986-7294 Cell: 805) 431-0552

GENERATING STATION HIGH ACCURACY ELECTRONIC WATT-HOUR METER TEST

Single Phase
Poly Phase

WORK ORDER #:

LOCATION: MANDALAY GEN. STATION SERIAL #: 21223
 MANUFACTURER: SCI COL MODEL: 6630 VOLTS: 120 SA NOMINAL ANALOG: 1.0 mA
 WATTS: 1000 PHASE: 3 ELEMENT: 3 WIRE: 3 PULSE/HOUR: 2100 Ke: _____ MULTIPLIER: 2100
 P.T RATIO: 35/1 C.T. RATIO: 300/5 STD. SER. NO.: _____ STD. mA: _____ STD. WATTS: _____
 STD. ELE.: _____

START OF TEST

TIME: 1530

WATT DISPLAY

WATT-HOUR COUNT: 692.554

END OF TEST

TIME: 1615

WATT DISPLAY

WATT-HOUR COUNT: 692.591

TEST DATA

NOMINAL SETTINGS				DIGITAL OUTPUT			ANALOG OUTPUT			WATTS DISPLAY								
Sec. Volts	Sec. Amps	P.F.	TM Coil	Run Pulses	RO Count	STD & IT % E	Standard Count		IND % E	TRUE % E	UT mA	STD. .mA	IND. % E	TRUE % E	Display Watts	STD. Watts	IND. % E	TRUE % E
							Run #1	Run #2										
120	5.0	1.0									1.20			0.11	5.3	25.0	600	
120	4.167	1.0		35	1 MIN						1.00			0.11	5.3	20.8	500.0	
120	2.55	1.0									0.60			0.11	5.3	12.5	300	
120	2.083	1.0									0.50			0.12	5.3	10.1	249.4	
120	1.042	1.0									0.25			0.12	5.3	5.0	125.0	
120	0.50	1.0									0.12			0.12	5.3	2.5	60.0	
120	0	1.0									0			-	-	0	0	

AS FOUND / AS LEFT

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

COMMENTS: REPAIR DIGITAL DEPT WITH MEASUREMENT ERROR CORRECTED TO 100%

AVIES II 440 TEST SET

Test Tech: Jim Samuel Signed: Jim Samuel Date: 12/10/2011
 Contact Information: 805) 986-7294 Cell: 805) 431-0552 (SAMPLING UNIT)

GENERATING STATION HIGH ACCURACY ELECTRONIC WATT-HOUR METER TEST

Single Phase
Poly Phase



WORK ORDER #

LOCATION: MANDALAY GOLF STATION
 MANUFACTURER: SCI CAL
 WATTS: 1000
 P.T. RATIO: 35/1
 STD. ELE.: _____

CIRCUIT: Unit 2 Auxiliary
 MODEL: 6620
 WIRE: 3
 PULSE/HOUR: 2100
 Ke: _____
 STD. mA: _____

SERIAL #: 21225
 NOMINAL ANALOG: 1.0 mA
 MULTIPLIER: 2100
 STD. WATTS: _____

START OF TEST
 TIME: 11:30 AM
 WATT DISPLAY: 0.003
 WATT-HOUR COUNT: 671934

END OF TEST
 TIME: 12:30 AM
 WATT DISPLAY: 0.003
 WATT-HOUR COUNT: 671934

TEST DATA

NOMINAL SETTINGS				DIGITAL OUTPUT				ANALOG OUTPUT				WATTS DISPLAY					
Sec. Volts	Sec. Amps	P.F.	TM Coll	Run Pulses	RO Count	STD & IT % E	Standard Count		IND % E	TRUE % E	UT mA	STD std. mA	IND. % E	Display Watts	STD. Watts	IND. % E	TRUE % E
							Run #1	Run #2									
120	5.0	1.0		35	1 MIN						1.2		0.17	FS	26.23	600	
120	4.167	1.0									1.0		0.17	FS	20.97	500.01	
120	3.50	1.0									0.6		0.17	FS	12.58	300	
120	3.085	1.0									0.5		0.15	FS	10.48	243.9	
120	1.042	1.0									0.25		0.15	FS	5.24	125.04	
120	0.450	1.0									0.12		0.17	FS	2.52	60	
120	0	1.0									0		0		0	0	

AS FOUND / AS LEFT

COMMENTS:

ARTES II 440 Meter Set

Test Tech: Jim Samuel
 Contact Information: 805) 996-7294

Signed: Jim Samuel
 Cell: 805) 431-0552

ISAC/SHEDD FOR

Date: 11/10/2011

GENERATING STATION HIGH ACCURACY ELECTRONIC WATT-HOUR METER TEST



Single Phase
Poly Phase

WORK ORDER #

LOCATION: MANDALAY GOLF STATION SERIAL # 21221
 MANUFACTURER: SCI COL MODEL: 6620 VOLTS: 120 5A NOMINAL ANALOG: 1.0 mA
 WATTS: 1000 PHASE: 3 ELEMENT: 2 WIRE: 3 PULSE/HOUR: 3500 Ke: MULTIPLIER: 3500
 P.T RATIO: 35/1 C.T. RATIO: 500/5 STD. SER. NO.: STD. Ke: STD. mA: STD. WATTS:

START OF TEST
 TIME: 1440 hrs
 WATT DISPLAY: 0.012
 WATT-HOUR COUNT: 164923

END OF TEST
 TIME: 1500 hrs
 WATT DISPLAY: 0.012
 WATT-HOUR COUNT: 164927

TEST DATA

NOMINAL SETTINGS				DIGITAL OUTPUT			ANALOG OUTPUT			WATTS DISPLAY						
Sec. Volts	Sec. Amps	P.F.	TM Coils	Run Pulses	RO Count	STD & IT % E	Standard Count		UT mA	STD std. mA	IND. % E	TRUE % E	Display Watts	STD. Watts	IND. % E	TRUE % E
							Run #1	Run #2	Ave.							
120	5.0	1.0								1.20			0.15	F.S.	4.94	600
120	4.167	1.0		583	MIN					1.00			0.15	F.S.	35.06	500.04
120	2.50	1.0								0.60			0.15	F.S.	21.06	500
120	2.083	1.0								0.50			0.15	F.S.	17.512	379.96
120	1.042	1.0								0.25			0.15	F.S.	8.764	125.04
120	0.50	1.0								0.12			0.15	F.S.	4.20	60.0
120	0	1.0								0			-	-	0	0

AS FOUND / AS LEFT

COMMENTS:

ARTES II 440 TEST SET

Test Tech: Jim Samuel (805) 986-7294
 Contact Information: 805) 431-0552
 Signed: Jim Samuel Date: 12/10/2011



Analytical Services, Inc.

Environmental and Analytical Services-Since 1994
California State Accredited Laboratory in Accordance with ELAP Certificate # 2332

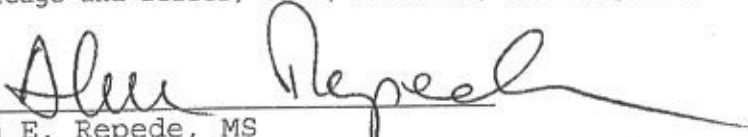
Prepared for: GenOn West
Mandalay G.S.
393 N. Harbor Blvd.
Oxnard, CA 93035
Attn: Scott Warnock

Report Date: August 8, 2012
Laboratory Number: 122296
Project Name: annual Nat. Gas Sample
Sampled by: Client

On August 6, 2012, Capco Analytical Services, Inc. (CAS), received one(1) sample to be analyzed. The sample was identified and assigned the laboratory ID number listed below:

<u>SAMPLE DESCRIPTION</u>	<u>CAS LAB NUMBER ID</u>
U-1 MAIN GAS HEADER	122296-01

By my signature below, I certify that the results contained in this laboratory report comply with applicable standards for certification by the California Department of Public Health's Environmental Laboratories Accreditation Program (ELAP), both technically and for completeness, and that, based on my inquiry of the person or persons directly responsible for performing the analyses, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.


Alin E. Repede, MS
Director - Analytical Operations

If you have any further questions or concerns, please contact me at your convenience. This report consists of 3 pages excluding the cover letter and the Chain of Custody.

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



Client:	GENON WEST, LP	Time Sampled:	9:46 AM
Sample ID:	U-1 MAIN GAS HEADER	Date Sampled:	08/06/12
CAS Lab No.	122296-01	Date Received:	08/06/12
Sample Matrix:	Gas	Date Analyzed:	08/06/12
Sample Temp °F:	68	Analyst:	KC

NATURAL GAS ANALYSIS
ASTM D1945 / D3588

Constituent	% Mole	% Weight	ppm(v/v)	Gals/Mft ³
Oxygen	0.38	0.60	3786	
Nitrogen	18.45	25.49		
Carbon Dioxide	3.98	8.64		
Methane	73.66	58.25		
Ethane	2.07	3.06		
Propane	0.63	1.38		0.175
Iso-Butane	0.27	0.76		0.086
n-Butane	0.27	0.76		0.084
Neo-Pentane	0.06	0.23		0.023
Iso-Pentane	0.09	0.34		0.035
n-Pentane	0.09	0.33		0.033
Hexane plus	0.039	0.17		0.016
Total	100.00	100.00		0.452
Specific Gravity	0.6992			
BTU h _h v	826			
BTU l _h v	745			
F-Factor (sd _{cf} /MM btu)	8552			
Compressibility	0.9981			
ROC/TOC	0.04			

BQL: Below Practical Quantitation Limit

** Low sample pressure during analysis



Analytical Services, Inc.

Environmental and Analytical Services-Since 1994

Client:	GENON WEST, LP	Date Sampled:	08/06/12
CAS Lab No.:	122296-01	Date Received:	08/06/12
Sample ID:	U-1 MAIN GAS HEADER	Date Analyzed:	08/06/12
Sample Matrix:	Gas	Analyst:	KC

TOTAL REDUCED SULFUR

METHOD GC/PFPD

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

DF: DILUTION FACTOR

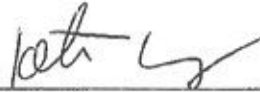
MDL: METHOD DETECTION LIMIT

ND: NOT DETECTED

Certificate of Analysis

Notes:

The Chain of Custody document is part of the analytical report.
Any remaining sample(s) for testing will be disposed of one month from the final report date unless other arrangements are made in advance.
All results are expressed on wet weight basis unless otherwise specified.



Authorized Signature

Keith Chang, Ph.D. (QA/QC Supervisor)

The results in this report apply to the samples analyzed in accordance with the chain of custody document. Capco Analytical certifies that the test results meet all requirements of ELAP unless noted in the Case Narrative. This analytical report must be reproduced in its entirety.

Legend for Abbreviations:

PQL	Practical Quantitation Limit
BQL	Below Practical Quantitation Limit
ND	NOT DETECTED at or above the Reporting Limit. If J-value reported, then NOT DETECTED at or above the Method Detection Limit (MDL).
MDL	Method Detection Limit
MRL	Method Reporting Limit
MDA	Minimum Detectable Activity
MCL	Maximum Contamination Level

GenOn West
MANDALAY GENERATING STATION
UNIT COLD START-UP TRACKING
October 2011 TO September 2012

Month	Unit #1	Unit #2
October, 2011	0	5
November, 2011	0	8
December, 2011	0	4
January, 2012	7	0
February, 2012	0	0
March, 2012	0	0
April, 2012	0	4
May, 2012	5	10
June, 2012	7	6
July, 2012	5	6
August, 2012	6	8
September, 2011	8	19
REPORTING YTD	38	70

**GenOn West L.P Mandalay Generating Station
Monthly and Rolling 12-Month Fuel Usage
2011-2012**

Natural Gas Fuel Throughput					
Month	Gas (HCF)		Rolling 12 Month Total (MMCF)*	Gas (MCF)	Rolling 12 Month Total (MMCF)**
	Unit 1	Unit 2		Unit 3	
2011 Oct	0.0	290,397.0	879	2,570.3	30.8
2011 Nov	5,614.2	352,664.0	878	2,637.1	30.5
2011 Dec	0.0	138,740.0	842	0.0	30.4
2012 Jan	490,092.8	2,726.1	708	87.0	30.5
2012 Feb	222,870.4	0.0	725	318.9	30.8
2012 Mar	4,533.1	0.0	726	0.0	29.3
2012 Apr	0.0	165,517.6	661	12,537.7	39.2
2012 May	839,110.8	1,064,597.6	742	7,076.8	41.3
2012 Jun	498,805.6	740,987.0	793	9,370.1	41.0
2012 Jul	1,558,692.1	860,833.1	944	7,318.7	46.2
2012 Aug	3,875,322.4	3,802,219.7	1,609	5,739.2	51.9
2012 Sep	790,878.8	402,931.5	1,611	24,937.7	72.6

* Limitation 33,204.6 MMCF/yr Natural Gas Throughput

** Limitation 197.58 MMCF/yr Natural Gas Throughput

GenOn West L.P Mandalay Generating Station
Monthly and Rolling 12-Month Diesel Engine Operation Totals
2011-2012

Month	154 HP Perkins engine (fire pump)		Rolling 12 Month Total (hours)*	201 HP Generac engine (emergency generator)		Rolling 12 Month Total (hours)*
	1st of Month Meter Reading	Hours		1st of Month Meter Reading	Hours	
2011 Oct	212.8	0.1	1.6	86.4	0.1	1.6
2011 Nov	212.9	0.1	1.6	86.5	0.1	1.6
2011 Dec	213	0.1	1.5	86.6	0.1	1.6
2012 Jan	213.1	0.1	1.5	86.7	0.1	1.6
2012 Feb	213.2	0.1	1.4	86.8	0.0	1.4
2012 Mar	213.3	0.2	1.5	86.8	0.1	1.4
2012 Apr	213.5	0.0	1.3	86.9	0.1	1.4
2012 May	213.5	0.0	1.2	87.0	0.1	1.2
2012 Jun	213.5	0.2	1.2	87.1	0.2	1.2
2012 Jul	213.7	0.0	1.1	87.3	0.1	1.3
2012 Aug	213.7	0.0	1.0	87.4	0.1	1.2
2012 Sep	213.7	0.1	1.0	87.5	0.0	1.1

* Limitation 20 hours/yr Usage

**GenOn West L.P Mandalay Generating Station
Monthly and Rolling 12-Month Gasoline Usage Totals
2011-2012**

Month	1,000 Gallon AST		Rolling 12 Month Total (gallons)*
	1st of Month Meter Reading	Usage Volume (gallons)	
2011 Oct	13,021.2	88.5	1,262
2011 Nov	13,109.7	52.1	1,228
2011 Dec	13,161.8	96.2	1,257
2012 Jan	13258.0	126.0	1,266
2012 Feb	13384.0	113.0	1,279
2012 Mar	13497.0	152.0	1,226
2012 Apr	13649.0	171.7	1,181
2012 May	13820.7	90.5	1,125
2012 Jun	13911.2	57.8	1,111
2012 Jul	13969	91.2	1,136
2012 Aug	14060.2	50.3	1,125
2012 Sep	14110.5	27.8	1,117

* Limitation 7,500 gallons/yr Usage