

Ormond Beach Generating Station
6635 South Edison Drive
Oxnard, CA 93033
Tel: (805) 986-7291
Fax: (805) 986-7245

November 8, 2013

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

RE: 2012-2013 Annual Compliance Certification
NRG California South LP. – Ormond Beach Generating Station – Permit No. 00065

Dear Mr. Olson,

NRG California South LP. is submitting the 2012-13 annual compliance certification report for the Ormond Beach Generating Station (Federal Operating Permit No. 00065 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, 2012 through September 30, 2013, and semi-annual deviation report for the period April 01, 2013 through September 30, 2013.

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

Sincerely,

Apeetha Jain
Air Quality Engineer

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

Enclosures

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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: <i>William Brasco</i> Title: Operations Manager – Ormond Beach Generating Station	Date: <i>11-8-13</i>
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Time Period Covered by Compliance Certification <u>10 / 01 / 2012</u> (MM/DD/YY) to <u>09 / 30 / 2013</u> (MM/DD/YY) NRG California South LP. – Ormond Beach Generating Station



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 10 / 01 / 2012 (MM/DD/YY) to 09 / 30 / 2013 (MM/DD/YY)

A. Emission Unit Description: Ormond Beach Unit 1			B. Pollutant: NOx
C. Measured Emission Rate: 0.007 lb/mmBtu (0.075 lb/ NMWh)	D. Limited Emission Rate: 0.10 lb / NMWh	E. Specific Source Test or Monitoring Record Citation: Attachment 59N1, Condition 1	F. Test Date: 08/14/2012 (Most recent RATA as there was none due because of infrequent operations)

A. Emission Unit Description: Ormond Beach Unit 1			B. Pollutant: NH3
C. Measured Emission Rate: 8.7 ppm	D. Limited Emission Rate: 10 ppm	E. Specific Source Test or Monitoring Record Citation: Attachment 59N1, Condition 3	F. Test Date: 07/09/2013

A. Emission Unit Description: Ormond Beach Unit 2			B. Pollutant: NOx
C. Measured Emission Rate: 0.009 lb/mmBtu (0.086 lb/NMwh)	D. Limited Emission Rate: 0.10 lb / NMWh	E. Specific Source Test or Monitoring Record Citation: Attachment 59N1, Condition 1	F. Test Date: 7/18/2013



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 10 / 01 / 2012 (MM/DD/YY) to 09 / 30 / 2013 (MM/DD/YY)

A. Emission Unit Description: Ormond Beach Unit 2			B. Pollutant: NH3
C. Measured Emission Rate: 1.7 ppm	D. Limited Emission Rate: 10 ppm	E. Specific Source Test or Monitoring Record Citation: Attachment 59N1, Condition 3	F. Test Date: 07/18/2013

A. Emission Unit Description: Ormond Beach North 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: 07/17/2013 @ 1500 (CEMS data)

A. Emission Unit Description: Ormond Beach South Auxiliary Boiler			B. Pollutant: NOx
C. Measured Emission Rate: 0.021 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: 07/17/2013 @ 1500 (CEMS data)



ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 10 / 01 / 2012 (MM/DD/YY) to 09 / 30 / 2013 (MM/DD/YY)

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: Date & Time Begin: _____ End: _____ When Discovered: Date & Time _____
D. Parameters monitored:	E. Limit:	F. Actual:
G. Probable Cause of Deviation:		H. Corrective actions taken:

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: Date & Time Begin: _____ End: _____ When Discovered: Date & Time _____
D. Parameters monitored:	E. Limit:	F. Actual:
G. Probable Cause of Deviation:		H. Corrective actions taken:



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 10 / 01 / 2012 (MM/DD/YY) to 09 / 30 / 2013 (MM/DD/YY)

Ormond Beach Generating Station

<p>A. Attachment # or Permit Condition #: Attachment 59N1, Condition #1</p>	<p>D. Frequency of monitoring:</p> <p>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/NMW-hr limit.</p> <p>Condition 1b – NRG is prohibited from burning fuel oil in these units. None was burned during the compliance certification time period.</p> <p>Condition 1c – NRG 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:</p> <p>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:</p> <p>Continuous</p>
<p>B. Description: NH3 Emissions</p> <p>The Annual Ammonia Slip test for Unit 1 & Units 2 was conducted on 07/09/2013 and 07/18/2013 respectively.</p> <p>The ammonia slip limit is 10 ppm - Unit 1 tested at 8.7 ppm and Unit 2 tested at 1.7 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>



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Ormond Beach Generating Station

<p>A. Attachment # or Permit Condition #: Attachment 59N1, Condition #4</p>	<p>D. Frequency of monitoring:</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 19 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>Continuous</p>
<p>C. Method of monitoring: CEMs Records and Operator 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 59N1, Condition #5</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: NOx lbs/NMW-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/NMW-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>Continuous</p>
<p>C. Method of monitoring: CEMs Records and Emission Calculations</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 59N1, Conditions #6 & #7</p>	<p>D. Frequency of monitoring:</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>Continuous</p>
<p>C. Method of monitoring: CEMs Records and Operator 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>



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Ormond Beach Generating Station

<p>A. Attachment # or Permit Condition #: Attachment 59N3, Condition #1</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: NOx Limits (Aux Boilers) 0.040 lbs/MMBTU Certified CEMS data demonstrates that there was one exceedance of the 0.040 lb/mmBtu limit.</p>	<p>Continuous</p>
<p>C. Method of monitoring: CEMs Records and Emission Calculations</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 59N3, Condition #2</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Cold Start-up, NOx Emission Limits There were 32 North Auxiliary Boiler cold starts and 33 South Auxiliary Boiler cold starts during the compliance period. These units are subject to a 4-hour NOx emission exemption period.</p>	<p>Continuous</p>
<p>C. Method of monitoring: CEMs Records and Operator 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> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Attachment 59N3, Condition #3</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: NOx Limits (Aux Boilers) calculation method Hourly natural gas emissions figures are calculated as required by this permit condition.</p>	<p>Continuous</p>
<p>C. Method of monitoring: CEMs Records and Emission Calculations</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>



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<p>A. Attachment # or Permit Condition #: Attachment 59N3, Conditions #4 - #5</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Record keeping Daily and hourly records are maintained as required.</p>	<p>Continuous</p>
<p>C. Method of monitoring: CEMS Records and Operator 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> *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:</p>
<p>B. Description: Phase 1 & 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. The tank was removed on 8/23/2013 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. The tank was removed on 8/23/2013</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> *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:</p>
<p>B. Description: Phase 1 & 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. THE TANK WAS REMOVED ON 8/23/2013</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> *If yes, attach Deviation Summary Form</p>



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Ormond Beach Generating Station

<p>A. Attachment # or Permit Condition #: Attachment 70N3-65, Conditions #7 - #8</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Phase 1 & 2 Vapor Recovery System Condition 7 – Records of all tests and repairs are maintained at the site. Condition 8 – NRG agrees that if it seeks replacement or modification of the dispensing facility it will seek a permit to construct. THE TANK WAS REMOVED ON 8/23/2013</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> *If yes, attach Deviation Summary Form</p>

<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 Condition 1 - Hourly operating records verify compliance with the 50 hour annual limit. Condition 2 - A non-resettable elapsed hour meter is operated on the unit. Condition 3 - The Cummins model NTA 855-G5 emergency generator is located in the emergency generator building next to (south of) the admin building. 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> *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 Condition 1 - Only CARB Diesel Fuel is used at the facility Condition 2 - Maintenance and testing operation of the emergency generator is limited to 20 hr/yr and is logged monthly Condition 3 - Records of operation and fuel purchased (type and quantity) are maintained on site</p>	<p>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> *If yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 10 / 01 / 2012 (MM/DD/YY) to 09 / 30 / 2013 (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:</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. There were no breakdowns or other deviations that are subject to 103N1, Condition 2.</p> <p>Condition 3 – Monitored violations are reported to the District within 96 hours.</p>	<p>Continuous</p>
<p>C. Method of monitoring: CEMs Inspection, Maintenance, Testing, and Reporting 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>

<p>A. Attachment # or Permit Condition #: Attachment 103N1-65, Conditions #4 - #6</p>	<p>D. Frequency of monitoring:</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>Continuous</p>
<p>C. Method of monitoring: CEMs Inspection, Maintenance, Testing, and Reporting 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>

<p>A. Attachment # or Permit Condition #: Attachment 103N3-65, Conditions #1 - #3</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Continuous Monitoring Systems</p> <p>Conditions 1, 2 – A CEMS system is operated and maintained at the station Aux-N and Aux-S which meets the requirements of Rule 103.A.3 and 103.C.3. There were no breakdowns or other deviations that are subject to 103N3, Condition 2.</p> <p>Condition 3 – Monitored violations are reported to the District within 96 hours.</p>	<p>Continuous</p>
<p>C. Method of monitoring: CEMs Inspection, Maintenance, Testing, and Reporting 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>



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Ormond Beach Generating Station

<p>A. Attachment # or Permit Condition #: Attachment 103N3-65, 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 as required by the condition.</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</p> <p>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>

<p>A. Attachment # or Permit Condition #: PO00065PC1-231, Conditions #1 - #2</p>	<p>D. Frequency of monitoring:</p> <p>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 onsite.</p> <p>Condition 2 - 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</p> <p>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 #: PO00065PC2, Conditions #1 - #2, #3 - #4, #5</p>	<p>D. Frequency of monitoring:</p> <p>Continuous</p>
<p>B. Description: Rule 26 Permitted Throughput and Consumption Limit for Unit 1 and 2, Aux. Boilers and Rule 29 Natural Gas Only Requirement</p> <p>Conditions 1, 2 - Monthly and rolling 12-month records are maintained onsite.</p> <p>Conditions 3, 4 - Units 1 and 2 and the north and south auxiliary boilers only fire natural gas.</p> <p>Condition 5 - Emissions and fuel records and source test reports are maintained onsite.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p> <p>N/A</p>
<p>C. Method of monitoring: Fuel Usage, Emission Records, and Test 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></p> <p>*If yes, attach Deviation Summary Form</p>



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Ormond Beach Generating Station

<p>A. Attachment # or Permit Condition #: Attachment 50, Conditions #1 – #4</p>	<p>D. Frequency of monitoring:</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 and Auxiliary Boilers Emergency Generator Portable Welder Bead Blaster</p>	<p>Periodic</p>
<p>C. Method of monitoring: Routine Visual Surveillance and Certification 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>

<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> *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 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>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> *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>B. Description: Fugitive Dust 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> *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>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>



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<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</p> <p>The site uses CARB-approved diesel in the emergency generator. Gasoline and diesel purchase records are maintained onsite for District review; delivery record is attached confirming use of CARB-certified gasoline and diesel fuels.</p>	<p>Continuous</p>
<p>C. Method of monitoring: CARB Diesel and Gasoline 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></p> <p>*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:</p>
<p>B. Description: Surface Cleaning and Degreasing</p> <p>Ormond Beach only uses cleaning products in nonrefillable aerosol cans. Records are maintained onsite.</p>	<p>Continuous</p>
<p>C. Method of monitoring: Routine surveillance of Solvent Usage, and Activity 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 74.11.1, Conditions #1 - #4</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Large Water Heaters and Small Boilers</p> <p>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>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 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 74.22, 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></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 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></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 #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></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 #5</p>	<p>D. Frequency of monitoring:</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>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></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 Part 70 General, Conditions #6 - #7</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: General Part 70 Permit Conditions</p> <p>Condition 6 - Facility furnishes information to District when requested.</p> <p>Condition 7 - Facility provides District access to facilities.</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></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 Part 70 General, Conditions #8 - #10</p>	<p>D. Frequency of monitoring:</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>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></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 Part 70 General, Conditions #11 - #15</p>	<p>D. Frequency of monitoring:</p> <p>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. 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>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</p> <p>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:</p> <p>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>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:</p> <p>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>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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<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>C. Method of monitoring: Periodic Review of Potentially Applicable Requirements</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 40CFR68RMP-65</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Risk Management Plan The site has a current and complete Risk Management Plan.</p>	<p>Anually</p>
<p>C. Method of monitoring: Risk Management Plan Documentation and Review</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 40CFR72-78</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Acid Rain Program Facility maintains records to ensure compliance with monitoring, emission limits, recordkeeping, and reporting requirements.</p>	<p>Continuous</p>
<p>C. Method of monitoring: Periodic Review of Requirements</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>



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<p>A. Attachment # or Permit Condition #: Attachment 40CFR82</p>	<p>D. Frequency of monitoring:</p> <p style="margin-left: 20px;">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></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 #: 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> *If yes, attach Deviation Summary Form</p>

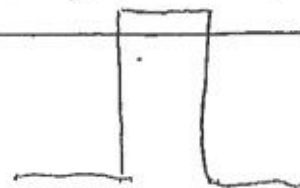
<p>A. Attachment # or Permit Condition #: INTENTIONALLY LEFT BLANK</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description:</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring:</p>	<p>F. Currently in Compliance? (Y or N):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

RECORD OF VISIBLE EMISSIONS

Client/Location DRMOND BEACH UNIT 1 Date 2/27/13
 Unit 1 Fuel NAT. GAS 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							30				
	01							31				
	02							32				
	03							33				
	04							34				
	05							35				
	06							36				
	07							37				
	08							38				
	09							39				
16	10	0	0	0	0			40				
	11	0	0	0	0			41				
	12	0	0	0	0			42				
	13	0	0	0	0			43				
	14	0	0	0	0			44				
	15	0	0	0	0			45				
	16	0	0	0	0			46				
	17							47				
	18							48				
	19							49				
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	24							54				
	25							55				
	26							56				
	27							57				
	28							58				
	29							59				

Comments/Notes: STACK HEIGHT = 200 FT. WIND
READINGS FROM 2 STRI HTS. AWAY.
LOAD = 22 MW



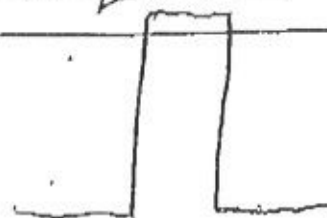
X OBSERVER
 M. ESCARCEGA

RECORD OF VISIBLE EMISSIONS

Client/Location ORMOND BEACH UNIT 2 Date 3/14/13
 Unit 2 Fuel NAT. GA Test No. 1 Observer M. ESCARCEGA
 Weather Conditions PTLY. CLOUDY WIND 10-15 m.p.h.
 Observer's Location SEE SKETCH BELOW

Time					Comments	Time					Comments	
Hr	Min	Seconds				Hr	Min	Seconds				
		00	15	30	45			00	15	30	45	
	00							30	0	0	0	
	01							31				
	02							32				
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	13							43				
	14							44				
	15							45				
	16							46				
	17							47				
	18							48				
	19							49				
	20							50				
	21							51				
	22							52				
	23							53				
15	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	0	0	0	0			58				
	29	0	0	0	0			59				

Comments/Notes: STACK HEIGHT = 200 FT. AWAY WIND
READINGS FROM 2-STR. HTS. AWAY
LOAD = 0 START-UP
GAS FLOW = 6,600 HSFH



OBSEVE
 SUN

RECORD OF VISIBLE EMISSIONS

Client/Location ORMOND NORTH AUX. BLR. Date 2/27/13
 Unit NAB Fuel NAT. GAS Test No. 1 Observer M. ESCARCEGA
 Weather Conditions CLEAR WINDY 10-20 MPH
 Observer's Location SEE SKETCH BELOW

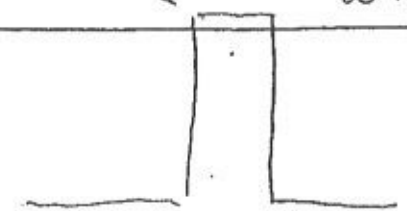
Time		Seconds				Comments	Time		Seconds				Comments
Hr	Min	00	15	30	45		Hr	Min	00	15	30	45	
	00												
	01							30					
	02							31					
	03							32					
	04							33					
	05							34					
	06							35					
	07							36					
	08	0	0	0	0			37					
09	08	0	0	0	0			38					
	09	0	0	0	0			39					
	10	0	0	0	0			40					
	11	0	0	0	0			41					
	12	0	0	0	0			42					
	13	0	0	0	0			43					
	14	0	0	0	0			44					
	15							45					
	16							46					
	17							47					
	18							48					
	19							49					
	20							50					
	21							51					
	22							52					
	23							53					
	24							54					
	25							55					
	26							56					
	27							57					
	28							58					
	29							59					

Comments/Notes: STACK HEIGHT ≈ 7.5 FT.

READINGS FROM 3-5 FT. HTS. AWAY.

GAS FLOW = 207 KSCPH

← WIND



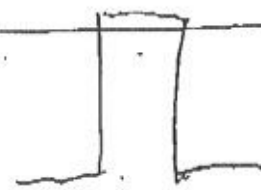
X OBSERVER
 NE SUN

RECORD OF VISIBLE EMISSIONS

Client/Location DRMOND SOUTH AUX. BLR. Date 3/14/13
 Unit SAB Fuel NAT. GAS Test No. 1 Observer M. ESCARCEGA
 Weather Conditions MOSTLY 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				
09	07	0	0	0	0			37				
	08	0	0	0	0			38				
	09	0	0	0	0			39				
	10	0	0	0	0			40				
	11	0	0	0	0			41				
	12	0	0	0	0			42				
	13	0	0	0	0			43				
	14							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 = 75 FT,
READINGS FROM 3-S.T.K. HTS. AWAY → WIND
GASFLOW = 111 KSCFH



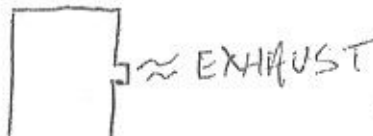
X OBSERVER
 X SUN

RECORD OF VISIBLE EMISSIONS

Client/Location HONDA GX 240
DRMOND BEACH DEWATER PUMP Date 6/13/13
 Unit _____ Fuel GASOLINE Test No. 1 Observer M. ESCARCEGA
 Weather Conditions CLOUDY ~ 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	0	0	0	0			30				
	01	0	0	0	0			31				
	02	0	0	0	0			32				
	03	0	0	0	0			33				
	04	0	0	0	0			34				
	05							35				
	06							36				
	07							37				
	08							38				
	09							39				
	10							40				
	11							41				
	12							42				
	13							43				
	14							44				
	15							45				
	16							46				
	17							47				
	18							48				
	19							49				
	20							50				
	21							51				
	22							52				
	23							53				
	24							54				
	25							55				
	26							56				
	27							57				
	28						10	58	0	0	0	0
	29							59	0	0	0	0

Comments/Notes: STACK HEIGHT = 15 ft



X OBSERVER NO SUN

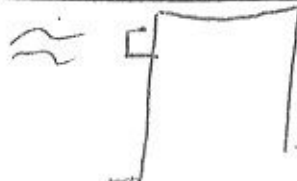
RECORD OF VISIBLE EMISSIONS

Client/Location HONDA GX 390
DRUMOND PORTABLE WELDER Date 6/13/13
 Unit _____ Fuel GASOLINE Test No. 1 Observer M. ESCARCEGA
 Weather Conditions CLOUDY - 10-15 mph 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				
	05							35				
	06							36				
	07							37				
	08							38				
	09							39				
	10							40				
	11							41				
	12							42				
	13							43				
	14						11	43	0	0	0	0
	15							44	0	0	0	0
	16							45	0	0	0	0
	17							46	0	0	0	0
	18							47	0	0	0	0
	19							48	0	0	0	0
	20							49	0	0	0	0
	21							50				
	22							51				
	23							52				
	24							53				
	25							54				
	26							55				
	27							56				
	28							57				
	29							58				
								59				

Comments/Notes: STACK HEIGHT = 2 FT.

EXHAUST



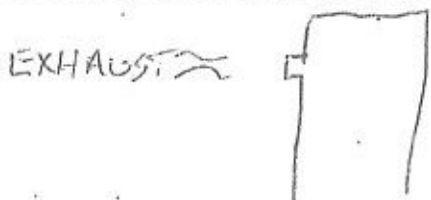
X OBSERVER

RECORD OF VISIBLE EMISSIONS

Client/Location BRIGGS & STRATTON AMT 550 SERIES
ARMAND Dewater PUMP Date 6/13/13
 Unit _____ Fuel GASOLINE Test No. 1 Observer M. ESCARCEGA
 Weather Conditions CLOUDY 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				
	01							31				
	02							32				
	03							33				
	04							34				
	05							35				
11	06	0	0	0	0			36				
	07	0	0	0	0			37				
	08	0	0	0	0			38				
	09	0	0	0	0			39				
	10	0	0	0	0			40				
	11	0	0	0	0			41				
	12	0	0	0	0			42				
	13							43				
	14							44				
	15							45				
	16							46				
	17							47				
	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 = 2 FT



X OBSERVER NO SUN

RECORD OF VISIBLE EMISSIONS

Client/Location ORMOND EMERGENCY DIESEL GEN Date 6/13/13

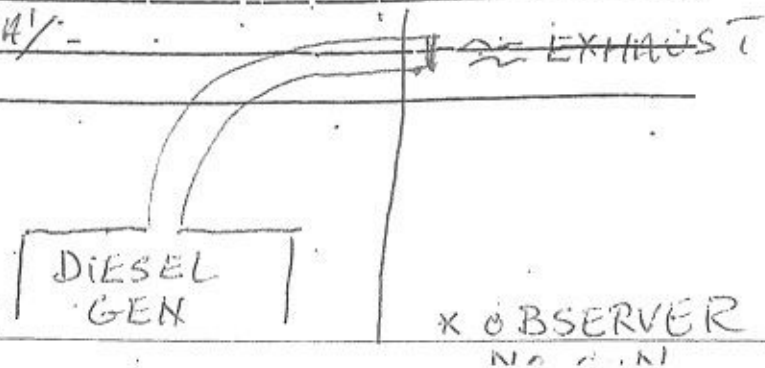
Unit _____ Fuel DIESEL Test No. 1 Observer M. ESCARLEGA

Weather Conditions CLOUDY 0-5 MPH 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				
	05							35				
	06							36				
	07							37				
	08							38				
	09							39				
	10							40				
	11							41				
	12						10	42	0	0	0	
	13							43	0	0	0	
	14							44	0	0	0	
	15							45	0	0	0	
	16							46	0	0	0	
	17							47	0	0	0	
	18							48	0	0	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 = 15 FT WALL
READINGS FROM 30 FT AWAY EXHAUST



X OBSERVER
 No. 10

RECORD OF VISIBLE EMISSIONS

Client/Location ORMOND BEAD BLASTER Date 6/13/13

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

Weather Conditions N/A

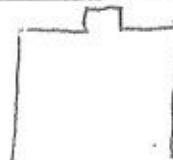
Observer's Location SEE SKETCH BELOW

Time					Comments	Time					Comments	
Hr	Min	Seconds				Hr	Min	Seconds				
		00	15	30	45			00	15	30	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				
	21							51				
	22							52				
11	23	00	00	00	00			53				
	24	00	00	00	00			54				
	25	00	00	00	00			55				
	26	00	00	00	00			56				
	27	00	00	00	00			57				
	28	00	00	00	00			58				
	29	00	00	00	00			59				

Comments/Notes: STACK HEIGHT = 7 FT

READINGS FROM INSIDE BLDG

EXHAUST



X OBSERVER

RECORD OF VISIBLE EMISSIONS

DEWATER PUMP

Client/Location VANGUARD - 13 HP

Date 6/13/13

Unit _____ Fuel GASOLINE Test No. 1

Observer M. ESCARLETT

Weather Conditions _____

Observer's Location SEE SKETCH BELOW

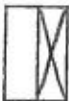
Time					Comments	Time					Comments	
Hr	Min	Seconds				Hr	Min	Seconds				
		00	15	30	45			00	15	30	45	
	00							30				
	01							31				
	02							32				
	03							33				
	04							34				
	05							35				
	06							36				
	07							37				
	08							38				
	09							39				
	10							40				
	11							41				
	12							42				
	13							43				
	14							44				
	15							45				
	16							46				
	17							47				
	18							48				
	19							49				
	20							50				
	21							51				
	22							52				
	23							53				
	24							54				
	25							55				
	26							56				
	27							57				
	28							58				
	29							59				

NON-OPERATIONAL
SINCE 2010

Comments/Notes: STACK HEIGHT =

ORMOND BEACH GENERATING STATION HIGH ACCURACY ELECTRONIC WATT-HOUR METER TEST

Single Phase
Poly Phase



WORK ORDER #:

LOCATION: 0855
 MANUFACTURER: SCI COL PHASE: 3 ELEMENT: 2 MODEL: 6620 CIRCUIT: WITZ 6605 SERIAL # 19675
 WATTS: 1000 P.T. RATIO: 240 C.T. RATIO: 5000 WIRE: 3 VOLTS: 120VAC SERIAL # 54 NOMINAL ANALOG: 1.0 mA
 STD. ELE.: _____ START OF TEST TIME: 13:45 PM WATT DISPLAY: 0.0 MULTIPLIER: 120000
 END OF TEST TIME: 1300 AM WATT DISPLAY: 0.0 STD. WATTS: _____
 WATT-HOUR COUNT: 733059 WATT-HOUR COUNT: 733286

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 sdd. mA	IND. % E	TRUE %E	Display Watts	STD. Watts	IND. %E	TRUE %E
							Run #1	Run #2										
120	5.0	1.0																
120	4.167	1.0			131/1005					0.918				1123.8				
120	2.5	1.0			0.825/1005					0.609				710.6				
120	2.083	1.0			0.596/1005					0.506				593.6				
120	1.042	1.0			0.345/1005					0.258				297.5				
120	0.5	1.0			0.166/1005					0.126				143.3				
120	0	1.0			0					0				0				

COMMENTS:

TEST EQUIP
ADD'NAL RB-10 STANDARD
TESTERS 10/10/12

Test Tech: Jim Samuel Signed: Jim Samuel Date: 10/30/2012
 Contact Information: 805) 986-7294 Cell: 805) 431-0552 Email: jsamuel@tm.com

ORMOND BEACH GENERATING STATION HIGH ACCURACY ELECTRONIC WATT-HOUR METER TEST

Single Phase
Poly Phase



WORK ORDER #:

LOCATION: 0895
 MANUFACTURER: SCI COL
 WATTS: 1000 PHASE: 3 ELEMENT: 3 MODEL: 6620 SERIAL #: 19676
 P.T. RATIO: 246 C.T. RATIO: 246 STD. SER. NO.: _____ WIRE: 3 VOLTS: 120VAC @ 574 NOMINAL ANALOG: 10 MA
 STD. ELE.: _____ START OF TEST TIME: 1325 PM END OF TEST TIME: 1355 PM
 WATT-HOUR COUNT: 998590 WATT DISPLAY: 0.0 WATT-HOUR COUNT: 998597 WATT DISPLAY: 0.0
 WATT-HOUR COUNT: 998590 WATT-HOUR COUNT: 998597

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	Avg.	IND %E	TRUE %E	UT mA	STD std. mA	IND. % E	TRUE %E	Display Watts	STD. Watts	IND. %E	TRUE %E	
AS FOUND / AS LEFT																			
120	5.0	1.0		1321	10.05						0.92								
120	4.167	1.0		4823	10.05						0.575								
120	2.5	1.0		4687	10.05						0.488								
120	2.083	1.0		0.345	10.05						0.245								
120	1.042	1.0		4.167	10.05						0.120								
120	0.5	1.0		0	0						0								
120	0	1.0		0	0						0								

COMMENTS: TEST EQUIP.

ARMOR RB-10 STANDARD
CERTIFIED 10/10/12

Test Tech: Jim Samuel Signed: Jim Samuel Date: 10/30/2012
 Contact Information: 805) 966-7294 Cell: 805) 431-0552 [samuel@tri.com]

ORMOND BEACH GENERATING STATION HIGH ACCURACY ELECTRONIC WATT-HOUR METER TEST

Single Phase
Poly Phase



WORK ORDER #:

LOCATION: OBSS
 MANUFACTURER: SCI COL PHASE: 3 ELEMENT: 2 MODEL: 6630 SERIAL #: 19673
 WATTS: 1000 P.T. RATIO: 246 C.T. RATIO: 246 WIRE: 3 PULSE/HOUR: 57600 VOLTS: 120VAC Ke: 54 NOMINAL ANALOG: 1.0 mA
 STD. ELE.: _____ STD. SER. NO.: _____ STD. Ke: _____ STD. mA: _____ MULTIPLIER: 57600
 START OF TEST TIME: 16:25 PM END OF TEST TIME: 16:45 PM
 WATT-HOUR COUNT: 737635 WATT-HOUR COUNT: 737642

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 std. mA	IND. % E	TRUE %E	Display Watts	STD. Watts	IND. %E	TRUE %E
AS FOUND / AS LEFT																	
120	5.0	1.0		—	—					—				—			
120	4.167	1.0		1343	16.05					0.935				53.75			
120	2.5	1.0		824	14.05					0.575				33.06			
120	2.083	1.0		688	14.05					0.486				27.66			
120	1.042	1.0		346	10.05					0.233				13.87			
120	0.5	1.0		165	14.05					0.124				6.60			
120	0	1.0		0	0					0				0			

COMMENTS: TEST EQUIP. APPROX RB-10 STANDARD CEATED 10/10/12

Test Tech: Jim Samuel Signed: Jim Samuel Date: 10/30/2012
 Contact Information: 805 986-7294 Cell: 805 431-0552 jsamuel@tm.com

ORMOND BEACH GENERATING STATION HIGH ACCURACY ELECTRONIC WATT-HOUR METER TEST

Single Phase
Poly Phase



WORK ORDER #

LOCATION: OBGS CIRCUIT: WH1/5R055 SERIAL #: 19672
 MANUFACTURER: SCI COL 3 MODEL: 6630 VOLTS: 120VAC SERIAL #: 54 NOMINAL ANALOG: 1.0 mA
 WATTS: 1000 PHASE: 3 ELEMENT: 2 WIRE: 3 PULSE/HOUR: 120000 Ke: 54 MULTIPLIER: 120000
 P.T. RATIO: 246 C.T. RATIO: 5000 STD. SER. NO.: STD. Ke: STD. mA: STD. WATTS:
 STD. ELE.: START OF TEST TIME: 1400 AM END OF TEST TIME: 1425 PM
 WATT-HOUR COUNT: 193415 WATT DISPLAY 0.0 WATT-HOUR COUNT: 193557 WATT DISPLAY 0.0

TEST DATA

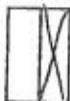
NOMINAL SETTINGS					DIGITAL OUTPUT			ANALOG OUTPUT			WATTS DISPLAY						
Sec. Volts	Sec. Amps	P. F.	TM Coil	Run Pulses	RO Count	STD & IT % E	Standard Count	IND %E	TRUE %E	UT mA	STD std. mA	IND. % E	TRUE %E	Display Watts	STD. Watts	IND. %E	TRUE %E
AS FOUND / AS LEFT																	
120	5.0	1.0		—	—					—				—			
120	4.167	1.0		1.523	10.05					0.955				1146.3			
120	2.5	1.0		2.824	10.05					0.604				712.6			
120	2.083	1.0		0.688	10.05					0.500				574.0			
120	1.042	1.0		4.346	10.05					0.228				298.5			
120	0.5	1.0		0.165	10.05					0.128				143.0			
120	0	1.0		0	0					0				0			

COMMENTS: TEST GOOD.
APPROX RB-10 STANDARD
CERTIFIED 10/10/12

Test Tech: Jim Samuel Signed: Jim Samuel Date: 10/30/2012
 Contact Information: 805) 986-7294 Cell: 805) 431-0552 Email: jsamuel@trr.com

ORMOND BEACH GENERATING STATION HIGH ACCURACY ELECTRONIC WATT-HOUR METER TEST

Single Phase
Poly Phase



WORK ORDER #

LOCATION: 0865
 MANUFACTURER: Sci'col MODEL: 2 CIRCUIT: Residuals SERIAL #: 16674
 WATTS: 1000 PHASE: 3 ELEMENT: 2 WIRE: 3 VOLTS: 120VAC SERIAL #: 54 NOMINAL ANALOG: 1.0 mA
 P.T. RATIO: 600 C.T. RATIO: 120 STD. SER. NO.: 72000 Ke: 72000 MULTIPLIER: 72000
 STD. ELE.: STD. Ke: STD. mA: STD. WATTS:

START OF TEST TIME: 10:35AM END OF TEST TIME: 12:05PM
 WATT DISPLAY 0.0 WATT DISPLAY 0.0
 WATT-HOUR COUNT: 91293 WATT-HOUR COUNT: 94312

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 std. mA	IND. % E	TRUE %E	Display Watts	STD. Watts	IND. %E	TRUE %E
							Run #1	Run #2	Ave.								
120	5.0	1.0		1.39	10.05					0.95				67.9			
120	4.167	1.0		2.81	10.05					0.59				42.07			
120	2.083	1.0		0.693	10.05					0.56				36.0			
120	1.042	1.0		2.329	10.05					2.870				18.07			
120	0.5	1.0		0.169	10.05					0.112				8.63			
120	0	1.0		0	0					0.0				0			

COMMENTS:

Test coils

Normal EB-10 Resistor 10/10/12

Test Tech: Jim Samuel
 Contact Information: 805 986-7294

Signed: Jim Samuel
 Cell: 805 431-0562

jsamuel@tm.com

Date:

10/30/2012



Analytical Services, Inc.

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

Prepared for: GenOn West, LP/Ormond Beach
6635 S. Edison Drive
Oxnard, CA 93033
Attn: Mike Escarcega

Report Date: April 5, 2013
Laboratory Number: 131106
Project Name: Annual Natural Gas Sample
Sampled by: Client

On April 3, 2013, 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>
G.C. VENT	131106-01

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.

Keith Chin-Yuan Chang, Ph.D.
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:	10:45 AM
Sample ID:	G.C. VENT	Date Sampled:	4/3/13
CAS Lab No.	131106-01	Date Received:	4/3/13
Sample Matrix:	Gas	Date Analyzed:	4/3/13
Sample Temp °F:	68	Analyst:	KC

NATURAL GAS ANALYSIS
ASTM D1945 / D3588

Constituent	% Mole	% Weight	ppm(v/v)	Gals/Mft ³
Oxygen	BQL	BQL	<1000	
Nitrogen	0.32	0.53		
Carbon Dioxide	1.03	2.67		
Methane	95.02	90.00		
Ethane	3.32	5.89		
Propane	0.24	0.61		0.065
Iso-Butane	0.03	0.09		0.008
n-Butane	0.03	0.11		0.010
Neo-Pentane	BQL	BQL		BQL
Iso-Pentane	BQL	0.03		0.003
n-Pentane	BQL	0.02		0.002
Hexane plus	BQL	0.03		BQL
Total	100.00	100.00		0.088
Specific Gravity	0.5846			
BTU hhv	1027			
BTU lhv	926			
F-Factor (sdcf/MM	8502			
Compressibility	0.9978			
ROC/TOC	0.01			

BQL: Below Practical Quantitation Limit

Client:	GENON WEST, LP	Date Sampled:	4/3/13
CAS Lab No.:	131106-01	Date Received:	4/3/13
Sample ID:	G.C. VENT	Date Analyzed:	4/3/13
Sample Matrix:	Gas	Analyst:	KC

TOTAL REDUCED SULFUR

METHOD GC/PFPD

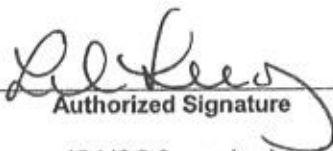
Constituents	Results		MDL
	Gr/100	SCF	
Hydrogen Sulfide	ND	1	0.05
Carbonyl Sulfide	ND	1	0.05
Methyl Mercaptan	ND	1	0.05
Ethyl Mercaptan	ND	1	0.05
Carbon Disulfide	ND	1	0.05
Dimethyl Sulfide	ND	1	0.05
Total Reduced Sulfur	ND		0.05

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

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
(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



Prepared for: GenOn West, LP/Ormond Beach
6635 S. Edison Drive
Oxnard, CA 93033
Attn: Mike Escarcega

Report Date: April 5, 2013
Laboratory Number: 131105
Project Name: Annual Natural Gas Sample
Sampled by: Client

On April 3, 2013, 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.2 MAIN GAS HDR	131105-01

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.

Keith Chin-Yuan Chang, Ph.D.
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:	11:55 AM
Sample ID:	U-2 MAIN GAS HDR	Date Sampled:	4/3/13
CAS Lab No.:	131105-01	Date Received:	4/3/13
Sample Matrix:	Gas	Date Analyzed:	4/3/13
Sample Temp °F:	68	Analyst:	KC

NATURAL GAS ANALYSIS
ASTM D1945 / D3588

Constituent	% Mole	% Weight	ppm(v/v)	Gals/Mft ³
Oxygen	BQL	BQL	<1000	
Nitrogen	0.52	0.87		
Carbon Dioxide	0.94	2.47		
Methane	96.02	91.80		
Ethane	2.23	3.99		
Propane	0.21	0.54		0.057
Iso-Butane	0.02	0.08		0.008
n-Butane	0.03	0.11		0.010
Neo-Pentane	BQL	BQL		BQL
Iso-Pentane	BQL	0.04		0.003
n-Pentane	BQL	0.03		0.003
Hexane plus	0.012	0.06		BQL
Total	100.00	100.00		0.080
Specific Gravity	0.5790			
BTU hhv	1017			
BTU lhv	917			
F-Factor (sdcf/MM)	8500			
Compressibility	0.9979			
ROC/TOC	0.01			

BQL: Below Practical Quantitation Limit

Client:	GENON WEST, LP	Date Sampled:	4/3/13
CAS Lab No.:	131105-01	Date Received:	4/3/13
Sample ID:	U-2 MAIN GAS HDR	Date Analyzed:	4/3/13
Sample Matrix:	Gas	Analyst:	KC

TOTAL REDUCED SULFUR

METHOD GC/PFPD

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

DF: DILUTION FACTOR


MDL: METHOD DETECTION LIMIT

ND: NOT DETECTED

Certificate of Analysis

Notes:

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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
(QA/QC Supervisor)

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MRL	Method Reporting Limit
MDA	Minimum Detectable Activity
MCL	Maximum Contamination Level

Gen On, WEST LP

Chain of Custody Record

DATE 4/3/13 PAGE 1 OF 1

ADDRESS MANDALAY GAS

PROJECT ANNUAL NAT. GAS SAMPLE
 SAMPLERS (SIGNATURE) Michael P. Swanson

SAMPLE NO	DATE	TIME	LOCATION	PARAMETERS								OTHER	NUMBER OF CONTAINERS	OBSERVATIONS/ COMMENTS		
				CAM METALS (16)	PR. POLLUTANT METALS (13)	GENERAL MINERALS	OIL & GREASE	PETROLEUM HYDROCARBONS	BASE/NEU/ACIDS (ORGANICS)	PESTICIDES	VOLATILE ORGANICS (601/602)				VOLATILE ORGANICS (624)	TOC/TOX
1	4/3/13	1155	U-2 MAIN GAS HDR.												ANALYZE FOR: TOTAL SULFUR IN GAS ULTIMATE ANALYSIS BTU/SCF % METHANE % ETHANE ETC.	
	SEND RESULTS & BILL TO SUOT WAREHOUSE @ MANDALAY GAS. 393 N. HARBOR BLVD. OXFORD, CA 95085															
	QUESTIONS: CONTACT NINE ESCARCEGA @ (909) 770-5617															
RELINQUISHED BY	DATE	TIME	RECEIVED BY	DATE	TIME	RELINQUISHED BY	DATE	TIME	RECEIVED BY	DATE	TIME	RELINQUISHED BY	DATE	TIME	METHOD OF SHIPMENT	TOTAL NUMBER OF CONTAINERS
<u>M. Swanson</u>	<u>4/3</u>	<u>13</u>	<u>Michael P. Swanson</u>	<u>4/3</u>	<u>13</u>	<u>Michael P. Swanson</u>	<u>4/3</u>	<u>13</u>	<u>Michael P. Swanson</u>	<u>4/3</u>	<u>13</u>	<u>Michael P. Swanson</u>	<u>4/3</u>	<u>13</u>		
Signature			Signature			Signature			Signature			Signature				
Printed Name			Printed Name			Printed Name			Printed Name			Printed Name				
Company			Company			Company			Company			Company				
RELINQUISHED BY	DATE	TIME	RECEIVED BY	DATE	TIME	RELINQUISHED BY	DATE	TIME	RECEIVED BY (Laboratory)	DATE	TIME	RELINQUISHED BY	DATE	TIME	SPECIAL SHIPMENT/HANDLING OR STORAGE REQUIREMENTS.	
<u>M. Swanson</u>	<u>4/3</u>	<u>13</u>	<u>HARRI. SANDOVAL</u>	<u>4/3</u>	<u>13</u>	<u>M. Swanson</u>	<u>4/3</u>	<u>13</u>	<u>APPC ENV.</u>	<u>4/3</u>	<u>13</u>	<u>M. Swanson</u>	<u>4/3</u>	<u>13</u>		
Signature			Signature			Signature			Signature			Signature				
Printed Name			Printed Name			Printed Name			Printed Name			Printed Name				
Company			Company			Company			Company			Company				

131105

OBSERVATIONS/
COMMENTS

NRG California South LP.
ORMOND BEACH GENERATING STATION
UNIT COLD START-UP TRACKING
2012, October to 2013, September

Month	Unit #1	Unit #2	NAB	SAB
October, 2012	0	0	1	0
November, 2012	0	0	1	1
December, 2012	0	1	1	1
January, 2013	0	1	2	1
February, 2013	1	0	1	1
March, 2013	0	3	3	3
April, 2013	0	4	6	7
May, 2013	3	1	6	5
June, 2013	1	1	2	3
July, 2013	1	6	5	8
August, 2013	0	1	1	1
September, 2013	2	1	3	2
REPORTING YTD	8	19	32	33

**NRG California South LP.
Ormond Beach Generating Station
Monthly and Rolling 12-Month Diesel Engine Operation Totals**

October 01, 2012

October 01, 2013

Diesel Fired Emergency Engine Operating Time			
Month	605 HP Cummins engine (Emergency Generator)		Rolling 12 Month Total (hours)*
	1st of Month Meter Reading	Hours	
October, 2012	83.6	0.0	2.0
November, 2012	83.6	0.5	2.3
December, 2012	84.1	0.2	2.3
January, 2013	84.3	0.0	1.9
February, 2013	84.3	0.2	2.1
March, 2013	84.5	0.1	1.8
April, 2013	84.6	0.3	2.1
May, 2013	84.9	0.0	1.9
June, 2013	84.9	0.4	2.0
July, 2013	85.3	0.2	2.2
August, 2013	85.5	0.0	2.1
September, 2013	85.5	0.3	2.2
October, 2013	85.8	0.2	2.4
Total this reporting period	1017.3		

* Limitation 20 hours/yr Usage

**NRG California South LP.
Ormond Beach Generating Station
Monthly and Rolling 12-Month Gasoline Usage Totals**

October 01, 2012 October 01, 2013

Gasoline Throughput			
Month	1,000 Gallon AST		Rolling 12 Month Total (gallons)*
	1st of Month Meter Reading	Volume (gallons)	
October, 2012	2985.8	69.6	847.4
November, 2012	3055.4	69.6	861.0
December, 2012	3092.7	37.3	870.3
January, 2013	3100.5	7.8	785.1
February, 2013	3100.5	0.0	689.1
March, 2013	3100.5	0.0	549.5
April, 2013	3100.5	0.0	502.4
May, 2013	3100.5	0.0	464.6
June, 2013	3100.5	0.0	432.0
July, 2013	3100.5	0.0	341.4
August, 2013	3100.5	0.0	283.1
September, 2013			
October, 2013			

* Limitation 10,000 gallons/yr Usage

** Tank Removed on 8/23/2013