



Mandalay Generating Station
393 N. Harbor Blvd.
Oxnard, CA 93035
Tel: (805) 984-5291
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February 12, 2016

Mr. Daniel Cho
Ventura County Air Pollution Control District
669 County Square Drive
Ventura, CA 93003

RE: 2015 Annual Compliance Certification
NRG California South LP. - Mandalay Generating Station – Permit No. 00013

Dear Mr. Cho,

NRG California South LP. is submitting the 2015 annual compliance certification report for the Mandalay Generating Station (Federal Operating Permit No. 00013 issued March 12, 2014) 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 January 01, 2015 through December 31, 2015, and semi-annual deviation report for the period July 1, 2015 through December 31, 2015.

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

Sincerely,

Apeetha Jain
Environmental Supervisor

Enclosures

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

Ventura County
FEB 12 2016
Air Pollution Control District



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:  Title: Plant Manager – Mandalay Generating Station	Date: 2-12-2016
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Time Period Covered by Compliance Certification 01 / 01 / 2015 (MM/DD/YY) to 12 / 31 / 2015 (MM/DD/YY) NRG California South LP. – Mandalay Generating Station



ANNUAL COMPLIANCE CERTIFICATION

SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 01/01/2015 (MM/DD/YY) to 12/31/2015 (MM/DD/YY)

A. Emission Unit Description: Mandalay Unit 1			B. Pollutant: NOx
C. Measured Emission Rate: 0.0001 lb/mmBtu (0.075 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: 11/10/2015

A. Emission Unit Description: Mandalay Unit 1			B. Pollutant: NH3
C. Measured Emission Rate: 3.2 ppm	D. Limited Emission Rate: 10 ppm	E. Specific Source Test or Monitoring Record Citation: Attachment 59N2, Condition 3	F. Test Date: 11/10/2015

A. Emission Unit Description: Mandalay Unit 2			B. Pollutant: NOx
C. Measured Emission Rate: 0.001 lb/mmBtu (0.075 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: 11/09/2015

A. Emission Unit Description: Mandalay Unit 2			B. Pollutant: NH3
C. Measured Emission Rate: 2.1 ppm	D. Limited Emission Rate: 10 ppm	E. Specific Source Test or Monitoring Record Citation: Attachment 59N2, Condition 3	F. Test Date: 11/09/2015

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: 01/01/2015 (MM/DD/YY) to 12/31/2015 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Attachment 103N1-13, Conditions # 2</p>	<p>B. Equipment description: Mandalay Unit 1 CEMS</p>	<p>C. Deviation Period: Date & Time Begin: <u>08/28/2015 @ 11:00</u> End: <u>08/28/2015 @ 13:00</u> When Discovered: Date & Time <u>8/28/2015 @ 11:30</u></p>
<p>D. Parameters monitored: NOx</p>	<p>E. Limit: N/A</p>	<p>F. Actual: N/A</p>
<p>G. Probable Cause of Deviation: Equipment failure on Unit 1 SCR duct expansion joint.</p>		<p>H. Corrective actions taken: The Unit was shut down as soon as the problem was identified. A replacement of the failed joint was completed on August 30, 2015. The unit did not run during this period. A follow up report dated 08/31/2015 was submitted to VCAPCD.</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>10/02/2015 @ 07:19</u> End: <u>10/02/2015 @ 07:39</u> When Discovered: Date & Time <u>10/02/2015 @ 07:22</u></p>
<p>D. Parameters monitored: NOx</p>	<p>E. Limit: N/A</p>	<p>F. Actual: N/A</p>
<p>G. Probable Cause of Deviation: Sample pump tripped.</p>		<p>H. Corrective actions taken: Sample pump restarted and CEMS was autocalibrated. A follow up report dated 10/05/2015 was submitted to VCAPCD.</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>10/12/2015 @ 09:00</u> End: <u>10/12/2015 @ 20:00</u> When Discovered: Date & Time <u>10/12/2015 @ 21:27</u></p>
<p>D. Parameters monitored: NOx</p>	<p>E. Limit: N/A</p>	<p>F. Actual: N/A</p>
<p>G. Probable Cause of Deviation: CEMS NOx analyzer would not go to a zero reading even after several troubleshooting attempts.</p>		<p>H. Corrective actions taken: The NOx analyzer was replaced and auto calibration was performed. A follow up report dated 10/13/2015 was submitted to VCAPCD.</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2015 (MM/DD/YY) to 12/31/2015 (MM/DD/YY)

Mandalay Generating Station

<p>A. Attachment # or Permit Condition #: Attachment 59N2, Condition #1</p>	<p>D. Frequency of monitoring:</p> <p style="text-align: center;">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</p> <p style="text-align: center;">N/A</p>
<p>C. Method of monitoring: CEMs Records and Emission Calculations</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Attachment 59N2, Condition #2</p>	<p>D. Frequency of monitoring:</p> <p style="text-align: center;">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</p> <p style="text-align: center;">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></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Attachment 59N2, Condition #3</p>	<p>D. Frequency of monitoring:</p> <p style="text-align: center;">Continuous</p>
<p>B. Description: NH3 Emissions</p> <p>The Annual Ammonia Slip Tests for Units 1 and 2 were conducted on 11/10/2015 and 11/09/2015, respectively. The ammonia slip limit is 10 ppm - Unit 1 tested at 3.2 ppm, Unit 2 tested at 2.1 ppm.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p> <p style="text-align: center;">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></p> <p>*If yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

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Mandalay Generating Station

<p>A. Attachment # or Permit Condition #: Attachment 59N2, Condition #4</p>	<p>D. Frequency of monitoring:</p> <p>Continuous</p>
<p>B. Description: Cold Start-up waiver for NOx and NH3 Emission Limits Logs for cold starts for Unit 1 and Unit 2 is documented and maintained on site. 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></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 #5</p>	<p>D. Frequency of monitoring:</p> <p>Continuous</p>
<p>B. Description: NOx lbs/MMW-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/MMW-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></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, Conditions #6 & #7</p>	<p>D. Frequency of monitoring:</p> <p>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></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: 01/01/2015 (MM/DD/YY) to 12/31/2015 (MM/DD/YY)

Mandalay Generating Station

<p>A. Attachment # or Permit Condition #: Attachment 70N3, 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 permanently installed submerged fill pipe and connections free of leak. Good practices are used to minimize spills and leaks.</p> <p>Condition 2 – Good practices are used to minimize spills and leaks.</p>	<p>Periodic</p>
<p>C. Method of monitoring: Inspection and Maintenance 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, Conditions #3</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Phase 1 & 2 Vapor Recovery System</p> <p>Required signs are posted and readily visible.</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: 01/01/2015 (MM/DD/YY) to 12/31/2015 (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 Condition 1 - Hourly operating records verify compliance with the 20 hour annual limit. Condition 2 - A non-resettable elapsed hour meter is operated on each unit. Condition 3 - The Perkins model 1006-GT emergency fire pump is located in the circ water pump pit; the Generac model 96A-00728-S emergency generator is located in the rear employee parking lot. Condition 4 - Calendar year hours of maintenance operation are reported by Feb 15.</p>	<p>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 N1, 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 fire pump 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>

<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: 01/01/2015 (MM/DD/YY) to 12/31/2015 (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 129.6 hours in calendar year 2015</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</p> <p>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. Three event 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</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>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 quarterly.</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>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2015 (MM/DD/YY) to 12/31/2015 (MM/DD/YY)

Mandalay Generating Station

<p>A. Attachment # or Permit Condition #: Attachment RICE MACT, Conditions #1 - #2</p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: Maintenance and Operation Recordkeeping Condition 1 – Engines inspected and oil changed annually Condition 2 – Operated according to manufacturer specifications</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Maintenance and Operation Log</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Attachment RICE MACT, Conditions #3 - #9</p>	<p>D. Frequency of monitoring: Continuous</p>
<p>B. Description: Operation Recordkeeping Condition 3 – Engines are equipped with a non-resettable timer Condition 4-9 – Operates less than the 100 hours permit limit.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Maintenance and Operation Log</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<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 Condition 1 - Monthly record-keeping of permitted throughput and consumption, including fuel consumption, are maintained on site. Unit 3 consumed 95.6 mmcf of natural gas during the 2015 compliance year. 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> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



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Period Covered by Compliance Certification: 01/01/2015 (MM/DD/YY) to 12/31/2015 (MM/DD/YY)

Mandalay Generating Station

<p>A. Attachment # or Permit Condition #: PO00013PC2, Conditions #1 - #2</p>	<p>D. Frequency of monitoring:</p> <p style="padding-left: 20px;">Continuous</p>
<p>B. Description: Rule 29 Natural Gas Combustion Only Requirements 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> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Attachment 50, Conditions #1 – #4</p>	<p>D. Frequency of monitoring:</p> <p style="padding-left: 20px;">Periodic</p>
<p>B. Description: Opacity Limitations Method 9 opacity readings were done on the following sources during the compliance period; records are attached verifying no visible emissions. Main Units (Unit 1 and Unit 2) and Unit 3 (Turbine Peaking Unit) Emergency Generator and Emergency Firewater Pump 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> *If yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2015 (MM/DD/YY) to 12/31/2015 (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 - #4</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>



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<p>A. Attachment # or Permit Condition #: Attachment 57.1, Conditions #1 - #3</p>	<p>D. Frequency of monitoring:</p> <p>Continuous</p>
<p>B. Description: Particulate Emissions from Fuel Burning Equipment</p> <p>Periodic Monitoring not required. District analysis dated 09/03/98 confirms compliance. (The 12/03/97 analysis noted in the permit is for Rule 68 and does not apply to Attachment 57.1)</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p> <p>N/A</p>
<p>C. Method of monitoring: Rule 57.B District Analysis</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

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

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



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<p>A. Attachment # or Permit Condition #: Attachment 74.6, Conditions #1 - #15</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Surface Cleaning and Degreasing Mandalay 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> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Attachment 74.11.1, Conditions #1 - #5</p>	<p>D. Frequency of monitoring:</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>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> *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:</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>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> *If yes, attach Deviation Summary Form</p>



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

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

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



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<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>C. Method of monitoring: Inspection, Notification, and Contractor 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 Part 70 General, Conditions #1 - #3</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 - Facility acknowledges deviations from Part 70 requirements are to be reported within 4 hours.</p>	<p>Continuous</p>
<p>C. Method of monitoring: Title V Reports and 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>

<p>A. Attachment # or Permit Condition #: Attachment Part 70 General, Conditions #4 - #7</p>	<p>D. Frequency of monitoring:</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>Continuous</p>
<p>C. Method of monitoring: Title V Reports and 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 Part 70 General, Conditions #8 - #10</p>	<p>D. Frequency of monitoring: Continuous</p>
<p>B. Description: General Part 70 Permit Conditions</p> <p>Condition 8 - Facility understands that the permit may be modified, revoked, reopened, reissued, or terminated for cause</p> <p>Condition 9 - Facility understands that the permit may be reopened by the District under specific conditions.</p> <p>Condition 10 - Facility strives to pay all fees to maintain the permit active.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Title V Reports and Periodic Review of Requirements</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Attachment Part 70 General, Conditions #11 - #13</p>	<p>D. Frequency of monitoring: Continuous</p>
<p>B. Description: General Part 70 Permit Conditions</p> <p>Condition 11 - Facility recognizes that the permit does not provide any specific property rights.</p> <p>Condition 12 - Facility recognizes that the permit provisions are severable.</p> <p>Condition 13 - Facility recognizes that an application for permit renewal is required no more than 18 months and no less than 6 months prior to the expiration date</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Title V Reports and Periodic Review of Requirements</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Attachment Part 70 General, Conditions #14 - #15</p>	<p>D. Frequency of monitoring: Continuous</p>
<p>B. Description: General Part 70 Permit Conditions</p> <p>Condition 14 - Facility recognizes that any document submitted on behalf of this permit must be certified by a responsible official.</p> <p>Condition 15 - Facility submits a certification of compliance with all applicable requirements to the District and EPA on an annual basis.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Title V Reports and Periodic Review of Requirements</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: Attachment PO General, Conditions #1 - #2</p>	<p>D. Frequency of monitoring:</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 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 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 #: 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>*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>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>



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<p>A. Attachment # or Permit Condition #: Attachment 40CFR68RMP-13</p>	<p>D. Frequency of monitoring:</p> <p style="text-align: center;">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></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 style="text-align: center;">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></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 40CFR82</p>	<p>D. Frequency of monitoring:</p> <p style="text-align: center;">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>