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

RECEIVED
VENTURA COUNTY
2017 FEB -8 PM 4:43
A.P.C.D.

February 8, 2017

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

RE: 2016 Annual Compliance Certification
NRG California South LP – Ormond Beach Generating Station – Permit No. 00065

Dear Mr. Cho,

NRG California South LP is submitting the 2016 annual compliance certification report for the Ormond Beach Generating Station (Federal Operating Permit No. 00065 issued on April 8, 2014) located in Oxnard, CA.

Please find enclosed VCAPCD Signature Cover Form - Certification by Responsible Official, Permit Attachment Form and supporting documents on the enclosed compact disk. These documents serve as the annual certification for the period January 01, 2016 through December 31, 2016, and semi-annual deviation report for the period July 01, 2016 through December 31, 2016.

If you have any questions or require additional information, please do not hesitate to contact me at (909) 986-7218 or scott.warnock@nrg.com

Sincerely,

Scott Warnock
Environmental Specialist

Enclosures

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

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:	Date:
	2-6-2017
Title: Plant Manager – Ormond Beach Generating Station	

Time Period Covered by Compliance Certification

01 / 01 / 2016 (MM/DD/YY) to 12 / 31 / 2016 (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: 01/01/2016 (MM/DD/YY) to 12/31/2016 (MM/DD/YY)

A. Emission Unit Description: Ormond Beach Unit 2			B. Pollutant: NOx
C. Measured Emission Rate: 0.002 lb/mmBtu (0.07 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: 09/02/2016

A. Emission Unit Description: Ormond Beach Unit 2			B. Pollutant: NH3
C. Measured Emission Rate: 5.7 ppm	D. Limited Emission Rate: 10 ppm	E. Specific Source Test or Monitoring Record Citation: Attachment 59N1, Condition 3	F. Test Date: 09/02/2016

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:

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 01/01/2016 (MM/DD/YY) 12/31/2016 (MM/DD/YY)

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: Date & Time
103N1-65, Conditions #2	Unit 1	Begin: 07/22/2016 3:15 am End: 07/22/2016 6:05 am When Discovered: Date & Time 07/22/2016 3:15 am
D. Parameters monitored:	E. Limit:	F. Actual:
NOx	N/A	N/A
G. Probable Cause of Deviation:	H. Corrective actions taken:	
Unit 1 CEMS Calibration failure	CEMS recalibrated and data substituted, Follow up report dated 07/25/2016 was submitted to VCAPCD.	

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: Date & Time
103N1-65, Conditions #2	Unit 2	Begin: 07/29/2016 7:12 am End: 07/29/2016 9:30 am When Discovered: Date & Time 07/29/2016 7:30 am
D. Parameters monitored:	E. Limit:	F. Actual:
NOx	N/A	N/A
G. Probable Cause of Deviation:	H. Corrective actions taken:	
Unit 2 CEMS Calibration failure	CEMS recalibrated and data substituted, Follow up report dated 08/02/2016 was submitted to VCAPCD.	

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: Date & Time
103N3-65, Conditions #2	Aux N & Aux S	Begin: 11/14/2016 7:10 am End: 11/14/2016 18:00 pm When Discovered: Date & Time 11/14/2016 7:10 am
D. Parameters monitored:	E. Limit:	F. Actual:
NOx	N/A	N/A
G. Probable Cause of Deviation:	H. Corrective actions taken:	
Aux N and Aux S CEMS had low water level in the water column in the back pressure regulator.	Water column in the back pressure regulator was refiled and CEMS was recalibrated. Follow up report dated 11/18/2016 was submitted to VCAPCD.	

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2016 (MM/DD/YY) to 12/31/2016 (MM/DD/YY)

Ormond Beach Generating Station

A. Attachment # or Permit Condition #: Attachment 59N1, Condition #1	D. Frequency of monitoring: Continuous
B. Description: NOx Emission Limit Condition 1a – Certified CEMS data demonstrates that there have been no exceedances of the 0.10 lbs/NMW-hr limit. Condition 1b – NRG is prohibited from burning fuel oil in these units. None was burned during the compliance certification time period. Condition 1c – NRG is prohibited from burning mixed fuel oil/natural gas in these units. None was burned during the compliance certification time period.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A
C. Method of monitoring: CEMs Records and Emission Calculations	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: Attachment 59N1, Condition #2	D. Frequency of monitoring: Continuous
B. Description: Oil Burned During Force Majeure Ormond Beach Generating Station is only permitted to burn natural gas in its boilers.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A
C. Method of monitoring: Fuel Usage Logs	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: Attachment 59N1, Condition #3	D. Frequency of monitoring: Continuous
B. Description: NH3 Emissions The Annual Ammonia Slip test for Unit 2 was conducted on 09/02/2016 and tested at 5.7ppm, within the 10ppm limit. The Annual Ammonia Slip test for Unit 1 was not conducted in 2016 as there were no RATA conducted in that year.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable BAAQMD method ST-1B dated 01/20/1982
C. Method of monitoring: Source Testing Reports	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2016 (MM/DD/YY) to 12/31/2016 (MM/DD/YY)

Ormond Beach Generating Station

A. Attachment # or Permit Condition #: Attachment 59N1, Condition #4	D. Frequency of monitoring: Continuous
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 20 hours, nor have any excess NOx emissions lasted longer than a cold start-up procedure.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A
C. Method of monitoring: CEMs Records and Operator Logs	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: Attachment 59N1, Condition #5	D. Frequency of monitoring: Continuous
B. Description: NOx lbs/NMW-Hr Condition 5a - CEMs are used to monitor and calculate the NOx emission rate. Condition 5b - The megawatt metering calibration test occurs annually. Condition 5c - The hourly lb/NMW-hr NOx is measured according to the procedures in 40 CFR 75.10(d)(1). Condition 5d - The documents are retained at the plant and are available for District review.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A
C. Method of monitoring: CEMs Records and Emission Calculations	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: Attachment 59N1, Conditions #6 & #7	D. Frequency of monitoring: Continuous
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.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A
C. Method of monitoring: CEMs Records and Operator Logs	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2016 (MM/DD/YY) to 12/31/2016 (MM/DD/YY)

Ormond Beach Generating Station

A. Attachment # or Permit Condition #: Attachment 59N3, Condition #1	D. Frequency of monitoring: Continuous
B. Description: NOx Limits (Aux Boilers) 0.040 lbs/MMBTU Certified CEMS data demonstrates that there was no exceedance of the 0.040 lb/mmBtu limit. .	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A
C. Method of monitoring: CEMs Records and Emission Calculations	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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

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

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2016 (MM/DD/YY) to 12/31/2016 (MM/DD/YY)

Ormond Beach Generating Station

A. Attachment # or Permit Condition #: Attachment 59N3, Conditions #4 - #5	D. Frequency of monitoring: Continuous
B. Description: Record keeping Daily and hourly records are maintained as required.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A
C. Method of monitoring: CEMS Records and Operator Logs	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: Attachment 70N3-65, Conditions #1 - #2	D. Frequency of monitoring: Periodic
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	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A
C. Method of monitoring: Inspection, Maintenance, and Testing Records	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: Attachment 70N3-65, Conditions #3 - #6	D. Frequency of monitoring: Periodic
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	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A
C. Method of monitoring: Inspection, Maintenance, and Testing Records	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2016 (MM/DD/YY) to 12/31/2016 (MM/DD/YY)

Ormond Beach Generating Station

A. Attachment # or Permit Condition #: Attachment 70N3-65, Conditions #7 - #8	D. Frequency of monitoring: Periodic
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	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A
C. Method of monitoring: Inspection, Maintenance, and Testing Records	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: Attachment 74.9N7 , Conditions #1 - #4	D. Frequency of monitoring: Periodic
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.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A
C. Method of monitoring: Maintenance and Operating Logs	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: Attachement ATCM Engine N2, Conditions #1 - #3	D. Frequency of monitoring: Periodic
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	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A
C. Method of monitoring: Purchase Records and Operation Log	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2016 (MM/DD/YY) to 12/31/2016 (MM/DD/YY)

Ormond Beach Generating Station

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

A. Attachment # or Permit Condition #: Attachment RICE MACT, Conditions #3 - #9	D. Frequency of monitoring: Continuous
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.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A
C. Method of monitoring: Maintenance and Operation Log	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: Attachment 103N1-65, Conditions #1 - #3	D. Frequency of monitoring: Continuous
B. Description: Continuous Monitoring Systems Conditions 1, 2 – A CEMS system is operated and maintained at the station Units 1 and 2 which meets the requirements of Rule 103.A.1 and 103.C.1. There were two breakdowns that are subject to 103N1, Condition 2. Condition 3 – Monitored violations are reported to the District within 96 hours.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A
C. Method of monitoring: CEMs Inspection, Maintenance, Testing, and Reporting Records	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): Y *If yes, attach Deviation Summary Form

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION

PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2016 (MM/DD/YY) to 12/31/2016 (MM/DD/YY)

Ormond Beach Generating Station

A. Attachment # or Permit Condition #: Attachment 103N1-65, Conditions #4 - #6	D. Frequency of monitoring: Continuous
B. Description: Continuous Monitoring Systems Condition 4 – Permanent CEMS records are maintained as required. Condition 5 – Data is reduced according to Appendix F of 40 CFR Part 75. Condition 6 - CEMS and excess emission reports are submitted to the District quarterly.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A
C. Method of monitoring: CEMs Inspection, Maintenance, Testing, and Reporting Records	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: Attachment 103N3-65, Conditions #1 - #3	D. Frequency of monitoring: Continuous
B. Description: Continuous Monitoring Systems 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 was one breakdown that are subject to 103N3, Condition 2. Condition 3 – Monitored violations are reported to the District within 96 hours.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A
C. Method of monitoring: CEMs Inspection, Maintenance, Testing, and Reporting Records	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): Y *If yes, attach Deviation Summary Form

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2016 (MM/DD/YY) to 12/31/2016 (MM/DD/YY)

Ormond Beach Generating Station

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

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

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

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2016 (MM/DD/YY) to 12/31/2016 (MM/DD/YY)

Ormond Beach Generating Station

A. Attachment # or Permit Condition #: Attachment 50, Conditions #1 – #4	D. Frequency of monitoring: Periodic
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 and Auxiliary Boilers Emergency Generator Portable Welder	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A
C. Method of monitoring: Routine Visual Surveillance and Certification Records	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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

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

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2016 (MM/DD/YY) to 12/31/2016 (MM/DD/YY)

Ormond Beach Generating Station

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

A. Attachment # or Permit Condition #: Attachment 57.1, Conditions #1 - #2	D. Frequency of monitoring: Continuous
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)	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A
C. Method of monitoring: Rule 57.B District Analysis	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2016 (MM/DD/YY) to 12/31/2016 (MM/DD/YY)

Ormond Beach Generating Station

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

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

A. Attachment # or Permit Condition #: Attachment 74.11.1, Conditions #1 - #4	D. Frequency of monitoring: N/A
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.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A
C. Method of monitoring: Equipment Design Record Review - Permit Condition Not Currently Applicable	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2016 (MM/DD/YY) to 12/31/2016 (MM/DD/YY)

Ormond Beach Generating Station

A. Attachment # or Permit Condition #: Attachment 74.22, Conditions #1 - #3	D. Frequency of monitoring: N/A
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.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A
C. Method of monitoring: Equipment Design Record Review - Permit Condition Not Currently Applicable	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: Attachment 74.1, Conditions #1 - #7	D. Frequency of monitoring: Periodic
B. Description: Abrasive Blasting Bead blast was replaced to no emissions blast in October 2014.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A
C. Method of monitoring: Operating Log Records; Routine Surveillance of Bead Blaster	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2016 (MM/DD/YY) to 12/31/2016 (MM/DD/YY)

Ormond Beach Generating Station

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

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

A. Attachment # or Permit Condition #: Attachment Part 70 General, Conditions #1 - #4	D. Frequency of monitoring: Continuous
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	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A
C. Method of monitoring: Title V Reports and Periodic Review of Requirements	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2016 (MM/DD/YY) to 12/31/2016 (MM/DD/YY)

Ormond Beach Generating Station

A. Attachment # or Permit Condition #: Attachment Part 70 General, Conditions #5	D. Frequency of monitoring: Continuous
B. Description: General Part 70 Permit Conditions Condition 5 - All required records, monitoring data, and support information are maintained for a period of 5 years.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A
C. Method of monitoring: Title V Reports and Periodic Review of Requirements	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: Attachment Part 70 General, Conditions #6 - #7	D. Frequency of monitoring: Continuous
B. Description: General Part 70 Permit Conditions Condition 6 - Facility furnishes information to District when requested. Condition 7 - Facility provides District access to facilities.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A
C. Method of monitoring: Title V Reports and Periodic Review of Requirements	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2016 (MM/DD/YY) to 12/31/2016 (MM/DD/YY)

Ormond Beach Generating Station

A. Attachment # or Permit Condition #: Attachment Part 70 General, Conditions #11 - #15	D. Frequency of monitoring: Continuous
B. Description: General Part 70 Permit Conditions Condition 11 - Facility recognizes that the permit does not provide any specific property rights. Condition 12 - Facility recognizes that the permit provisions are severable.Condition 13 - Facility recognizes that an application for permit renewal is required no more than 18 months and no less than 6 months prior to the expiration date Condition 14 - Facility recognizes that any document submitted on behalf of this permit must be certified by a responsible official. Condition 15 - Facility submits a certification of compliance with all applicable requirements to the District and EPA on an annual basis.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A
C. Method of monitoring: Title V Reports and Periodic Review of Requirements	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: Attachment PO General, Conditions #1 - #2	D. Frequency of monitoring: Continuous
B. Description: General Permit to Operate Conditions Condition 1 - Facility recognizes that petitions to review or revise conditions issued on a permit to operate must be submitted within 30 days of receipt of permit to operate. Condition 2 - Facility maintains copies of the permit reasonably close to the equipment and readily accessible for District review.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A
C. Method of monitoring: Periodic Review of Requirements	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: Attachment PO General, Conditions #3 - #4	D. Frequency of monitoring: Continuous
B. Description: General Permit to Operate Conditions Condition 3 - Facility recognizes that equipment that is not permitted as portable is not transferable from one location to another Condition 4 - Facility recognizes that the District may suspend the permit if District is denied access to requested information within a reasonable amount of time.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A
C. Method of monitoring: Periodic Review of Requirements	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2016 (MM/DD/YY) to 12/31/2016 (MM/DD/YY)

Ormond Beach Generating Station

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

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

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

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2016 (MM/DD/YY) to 12/31/2016 (MM/DD/YY)

Ormond Beach Generating Station

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

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

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