



**GenOn Energy, Inc.**  
Mandalay Generating Station  
393 N. Harbor Boulevard  
Oxnard, CA 93035

February 14, 2018

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

**RE: 2017 Annual Compliance Certification  
NRG California South LP  
Mandalay Generating Station  
Permit No. 00013**

Dear Mr. Searcy,

NRG California South LP is submitting the 2017 annual compliance certification report for the Mandalay Generating Station (Federal Operating Permit No. 00013 issued on March 12, 2014) located in Oxnard, CA.

Please find enclosed VCAPCD Signature Cover Form - Certification by Responsible Official, Permit Attachment Form and supporting documents (attached CD). These documents serve as the annual certification for the period January 01, 2017 through December 31, 2017, and semi-annual deviation report for the period July 01, 2017 through December 31, 2017.

If you have any questions or require additional information, please do not hesitate to contact me at (805) 986-7218 or [scott.warnock@genon.com](mailto:scott.warnock@genon.com)

Sincerely,  
**Mandalay Generating Station**

Scott Warnock  
Environmental Specialist

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

Enclosures

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VENTURA COUNTY  
2018 FEB 14 PM 4:08  
A.P.C.D.



Ventura County  
Air Pollution  
Control District

## ANNUAL COMPLIANCE CERTIFICATION SIGNATURE COVER FORM

A copy of each Annual Compliance Certification shall be submitted to EPA, Region 9, at the following address:


Mr. Gerardo Rios, Chief  
Permits Office (AIR-3)  
Office of Air Division  
EPA Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

### Confidentiality

All information in a Part 70 permit compliance certification is public information. The Part 70 permit is also public information.

### Certification by Responsible Official

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this compliance certification are true, accurate, and complete.

Signature and Title of Responsible Official:    Title: Plant Manager – Mandalay Generating Station	Date:  <i>2-14-2018</i>
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Time Period Covered by Compliance Certification  <u>01 / 01 / 2017</u> (MM/DD/YY) to <u>12 / 31 / 2017</u> (MM/DD/YY)  NRG California South LP. – Mandalay Generating Station
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## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2017 (MM/DD/YY) to 12/31/2017 (MM/DD/YY)

Mandalay Generating Station

A. Attachment # or Permit Condition #: Attachment 59N2, Condition #1	D. Frequency of monitoring:
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.	Continuous
	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): <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

A. Attachment # or Permit Condition #: Attachment 59N2, Condition #2	D. Frequency of monitoring:
B. Description: Oil Burned During Force Majeure Mandalay Generating Station is only permitted to burn natural gas in its boilers.	Continuous
	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): <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

A. Attachment # or Permit Condition #: Attachment 59N2, Condition #3	D. Frequency of monitoring:
B. Description: NH3 Emissions The Annual Ammonia Slip Tests for Units 1 and 2 were conducted on 11/28/2016 and 11/29/2017, respectively. The ammonia slip limit is 10 ppm - Unit 1 tested at 5.8 ppm, Unit 2 tested at 3.2 ppm.	Continuous
	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): <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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2017 (MM/DD/YY) to 12/31/2017 (MM/DD/YY)

Mandalay Generating Station

A. Attachment # or Permit Condition #: Attachment 59N2, 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 10 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): <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

A. Attachment # or Permit Condition #: Attachment 59N2, 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): <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

A. Attachment # or Permit Condition #: Attachment 59N2, 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): <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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2017 (MM/DD/YY) to 12/31/2017 (MM/DD/YY)

Mandalay Generating Station

A. Attachment # or Permit Condition #: Attachment 70N3, 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 permanently installed submerged fill pipe and connections free of leak. Good practices are used to minimize spills and leaks.  Condition 2 – Good practices are used to minimize spills and leaks.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A
C. Method of monitoring: Inspection and Maintenance Records	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

A. Attachment # or Permit Condition #: Attachment 70N3, Conditions #3	D. Frequency of monitoring:  Periodic
B. Description: Phase 1 & 2 Vapor Recovery System  Required signs are posted and readily visible.	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): <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





## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2017 (MM/DD/YY) to 12/31/2017 (MM/DD/YY)

Mandalay Generating Station

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 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.	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): <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

A. Attachment # or Permit Condition #: Attachment ATCM Engine N1, 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 fire pump 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): <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

A. Attachment # or Permit Condition #: Attachment 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): <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



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Period Covered by Compliance Certification: 01/01/2017 (MM/DD/YY) to 12/31/2017 (MM/DD/YY)

Mandalay Generating Station

A. Attachment # or Permit Condition #: Attachment 74.23N8, Conditions #1 - #3	D. Frequency of monitoring:  Continuous
B. Description: Stationary Gas Turbines  Condition 1 - A totalizing operating hour meter is installed; monthly records of operating hours are maintained.  Condition 2 - Unit 3 operated 354.0 hours in calendar year 2017  Condition 3 - Unit 3 was under a operating hour emergency variance in December 2017 which allowed operation > 200 hours per year. Actual operating hours are maintained below 200 hours/year during a non-variance period.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Non-resettable totalizing hour meter
C. Method of monitoring: Operating Logs	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

A. Attachment # or Permit Condition #: Attachment 103N1-13, 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. One event subject to 103N1-13 Condition 2 are reported on the attached Deviation forms.  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): <u>Y</u>  G. Compliance Status? (C or I): <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>Y</u>  *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: Attachment 103N1-13, 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): <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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2017 (MM/DD/YY) to 12/31/2017 (MM/DD/YY)

Mandalay Generating Station

A. Attachment # or Permit Condition #: Attachment RICE MACT, Conditions #1 - #2	D. Frequency of monitoring:
B. Description: Maintenance and Operation Recordkeeping Condition 1 – Engines inspected and oil changed annually Condition 2 – Operated according to manufacturer specifications	Periodic
C. Method of monitoring: Maintenance and Operation Log	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A
	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

A. Attachment # or Permit Condition #: Attachment RICE MACT, Conditions #3 - #9	D. Frequency of monitoring:
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.	Continuous
C. Method of monitoring: Maintenance and Operation Log	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A
	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

A. Attachment # or Permit Condition #: PO00013PC1, Conditions #1 - #2	D. Frequency of monitoring:
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 60.8 mmcf of natural gas during the 2017 compliance year. Condition 2 - Mandalay only uses cleaning products in nonrefillable aerosol cans. Records are maintained onsite.	Continuous
C. Method of monitoring: Rules 26 and 29 Fuel Throughput/Consumption and Rule 29 Solvent Usage Records	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A
	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





## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2017 (MM/DD/YY) to 12/31/2017 (MM/DD/YY)

Mandalay Generating Station

A. Attachment # or Permit Condition #: PO00013PC2, Conditions #1 - #2	D. Frequency of monitoring: Continuous
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.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A
C. Method of monitoring: Fuel Usage Records	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

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 (Unit 1 and Unit 2) and Unit 3 (Turbine Peaking Unit) Emergency Generator and Emergency Firewater Pump Bead Blaster	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable EPA Method 9
C. Method of monitoring: Routine Visual Surveillance and Certification Records	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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2017 (MM/DD/YY) to 12/31/2017 (MM/DD/YY)

Mandalay Generating Station

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): <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

A. Attachment # or Permit Condition #: Attachment 54.B.2, Conditions #1 - #4	D. Frequency of monitoring:  Annually
B. Description: Sulfur Compounds Ground Level  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.	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): <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

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): <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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2017 (MM/DD/YY) to 12/31/2017 (MM/DD/YY)

Mandalay Generating Station

A. Attachment # or Permit Condition #: Attachment 57.1, Conditions #1 - #3	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): <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

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): <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

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 and emergency firewater pump. Fuel purchase records are maintained onsite for District review; delivery record is attached confirming use of CARB Diesel.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A
C. Method of monitoring: CARB Diesel Purchase Records	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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2017 (MM/DD/YY) to 12/31/2017 (MM/DD/YY)

Mandalay Generating Station

A. Attachment # or Permit Condition #: Attachment 74.6, Conditions #1 - #15	D. Frequency of monitoring: Continuous
B. Description: Surface Cleaning and Degreasing Mandalay 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): <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

A. Attachment # or Permit Condition #: Attachment 74.11.1, Conditions #1 - #5	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): <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

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): <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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2017 (MM/DD/YY) to 12/31/2017 (MM/DD/YY)

Mandalay Generating Station

A. Attachment # or Permit Condition #: Attachment 74.1, Conditions #1 - #7	D. Frequency of monitoring:  Periodic
B. Description: Abrasive Blasting Bead blast records are available for review at the plant.	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): <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

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.	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): <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

A. Attachment # or Permit Condition #: Attachment 74.29N3, Conditions #1 - #14	D. Frequency of monitoring:  N/A
B. Description: Soil Decontamination Operations No soil decontamination operations took place at the Mandalay 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): <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





## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2017 (MM/DD/YY) to 12/31/2017 (MM/DD/YY)

Mandalay Generating Station

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): <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

A. Attachment # or Permit Condition #: Attachment Part 70 General, Conditions #1 - #3	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 - Facility acknowledges deviations from Part 70 requirements are to be reported within 4 hours.	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): <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

A. Attachment # or Permit Condition #: Attachment Part 70 General, Conditions #4 - #7	D. Frequency of monitoring:  Continuous
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.	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): <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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2017 (MM/DD/YY) to 12/31/2017 (MM/DD/YY)

Mandalay Generating Station

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): <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

A. Attachment # or Permit Condition #: Attachment Part 70 General, Conditions #11 - #13	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	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): <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

A. Attachment # or Permit Condition #: Attachment Part 70 General, Conditions #14 - #15	D. Frequency of monitoring:  Continuous
B. Description: General Part 70 Permit Conditions  Condition 14 - Facility recognizes that any document submitted on behalf of this permit must be certified by a responsible official.  Condition 15 - Facility submits a certification of compliance with all applicable requirements to the District and EPA on an annual basis.	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): <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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2017 (MM/DD/YY) to 12/31/2017 (MM/DD/YY)

Mandalay Generating Station

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): <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

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): <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

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): <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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2017 (MM/DD/YY) to 12/31/2017 (MM/DD/YY)

Mandalay 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): <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

A. Attachment # or Permit Condition #: Attachment SHIELD - GG	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): <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

A. Attachment # or Permit Condition #: Attachment SHIELD - YYYY	D. Frequency of monitoring: Continuous
B. Description: Permit Shield - National Emissions Standards for Hazardous Air Pollutants Facility periodically reviews applicability of identified NESHAP 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): <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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2017 (MM/DD/YY) to 12/31/2017 (MM/DD/YY)

Mandalay Generating Station

A. Attachment # or Permit Condition #: Attachment 40CFR68RMP-13	D. Frequency of monitoring:  Annually
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): <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

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): <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

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): <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





Ventura County  
Air Pollution  
Control District

## ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 01/01/2017 (MM/DD/YY) to 12/31/2017 (MM/DD/YY)

A. Emission Unit Description: Mandalay Unit 1			B. Pollutant: NOx
C. Measured Emission Rate: 0.001 lb/mmBtu	D. Limited Emission Rate: 0.10 lb / NMWh	E. Specific Source Test or Monitoring Record Citation: Attachment 59N2, Condition 1	F. Test Date: 11/28/2017

A. Emission Unit Description: Mandalay Unit 1			B. Pollutant: NH3
C. Measured Emission Rate: 5.8 ppm	D. Limited Emission Rate: 10 ppm	E. Specific Source Test or Monitoring Record Citation: Attachment 59N2, Condition 3	F. Test Date: 11/28/2017

A. Emission Unit Description: Mandalay Unit 2			B. Pollutant: NOx
C. Measured Emission Rate: 0.001 lb/mmBtu	D. Limited Emission Rate: 0.10 lb / NMWh	E. Specific Source Test or Monitoring Record Citation: Attachment 59N2, Condition 1	F. Test Date: 11/29/2017

A. Emission Unit Description: Mandalay Unit 2			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: 11/29/2017

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: 01/01/2017 (MM/DD/YY) to 12/31/2017 (MM/DD/YY)

A. Attachment # or Permit Condition #: Attachment 103N1-13, Conditions # 2	B. Equipment description: Mandalay Unit 1 CEMS	C. Deviation Period: Date & Time Begin: <u>05/02/2017 @ 16:04</u> End: <u>05/02/2017 @ 22:33</u> When Discovered: Date & Time <u>05/02/2017 @ 16:04</u>
D. Parameters monitored: NOx	E. Limit: N/A	F. Actual: N/A
G. Probable Cause of Deviation: Calibration Failure		H. Corrective actions taken: Auto-calibration was performed and CEMS successfully passed calibration. A follow up report dated 05/05/2017 was submitted to VCAPCD.

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:	