



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

RECEIVED
VENTURA COUNTY
2019 FEB 15 PM 2:35
A.P.C.D.

February 15, 2019

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

RE: 2018 Annual Compliance Certification
GenOn
Mandalay Generating Station
Permit No. 00013

Dear Mr. Searcy,

GenOn is submitting the 2018 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. These documents serve as the annual certification for the period January 01, 2018 through December 31, 2018, and semi-annual deviation report for the period July 01, 2018 through December 31, 2018.

Please note that GenOn permanently retired all electric generating units at Mandalay Generating Station in 2018. Also, Mandalay Generating Station has been removed from the EPA Acid Rain Program.

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

Sincerely,

Mandalay Generating Station

Scott Warnock
Environmental Specialist III

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

Enclosures



Ventura County
Air Pollution
Control District

**ANNUAL COMPLIANCE CERTIFICATION
SIGNATURE COVER FORM**

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


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

Confidentiality

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

Certification by Responsible Official

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

<p>Signature and Title of Responsible Official:</p>  <p>Title: Plant Manager – Mandalay Generating Station</p>	<p>Date:</p> <p>2-15-2019</p>
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<p>Time Period Covered by Compliance Certification</p> <p><u>01 / 01 / 2018</u> (MM/DD/YY) to <u>12 / 31 / 2018</u> (MM/DD/YY)</p> <p>GenOn – Mandalay Generating Station</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2018 (MM/DD/YY) to 12/31/2018 (MM/DD/YY)

Mandalay Generating Station

<p>A. Attachment # or Permit Condition #: Attachment 59N2, Condition #1</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: NOx Emission Limit</p>	<p>Continuous</p>
<p>Major Electric Generating Units 1 & 2 at Mandalay Generating Station did not operate in 2018 and were permanently retired in 2018. The Title V permit has been terminated and the facility has been removed from the Acid Rain Program.</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></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>B. Description: Oil Burned During Force Majeure</p>	<p>Continuous</p>
<p>Major Electric Generating Units 1 & 2 and Stationary Gas Turbines at Mandalay Generating Station did not operate in 2018 and were permanently retired in 2018. The Title V permit has been terminated and the facility has been removed from the Acid Rain Program.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Fuel Usage Logs</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></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>B. Description: NH3 Emissions</p>	<p>Continuous</p>
<p>Major Electric Generating Units 1 & 2 at Mandalay Generating Station did not operate in 2018 and were permanently retired in 2018. The Title V permit has been terminated and the facility has been removed from the Acid Rain Program.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable BAAQMD method ST-1B dated 01/20/1982</p>
<p>C. Method of monitoring: Source Testing Reports</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2018 (MM/DD/YY) to 12/31/2018 (MM/DD/YY)

Mandalay Generating Station

<p>A. Attachment # or Permit Condition #: Attachment 59N2, Condition #4</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Cold Start-up waiver for NOx and NH3 Emission Limits</p>	<p>Continuous</p>
<p>Major Electric Generating Units 1 & 2 at Mandalay Generating Station did not operate in 2018 and were permanently retired in 2018. The Title V permit has been terminated and the facility has been removed from the Acid Rain Program.</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>B. Description: NOx lbs/NMW-Hr</p>	<p>Continuous</p>
<p>Major Electric Generating Units 1 & 2 at Mandalay Generating Station did not operate in 2018 and were permanently retired in 2018. The Title V permit has been terminated and the facility has been removed from the Acid Rain Program.</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>B. Description: Hourly Recordkeeping</p>	<p>Continuous</p>
<p>Major Electric Generating Units 1 & 2 at Mandalay Generating Station did not operate in 2018 and were permanently retired in 2018. The Title V permit has been terminated and the facility has been removed from the Acid Rain Program.</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>



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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>



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Period Covered by Compliance Certification: 01/01/2018 (MM/DD/YY) to 12/31/2018 (MM/DD/YY)

Mandalay Generating Station

<p>A. Attachment # or Permit Condition #: Attachment 74.9N7 , Conditions #1 - #4</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Stationary Internal Combustion Engines</p> <p>Condition 1 – The stationary IC engine did not operate >50 hrs. per calendar year</p> <p>Condition 2 – The IC engine is equipped with a non-resettable elapsed hour meter</p> <p>Condition 3 – Annual Compliance Certification is provided which includes manufacturer, model number operator ID number and location.</p> <p>Condition 4 – The annual operating report has been supplied to the District</p>	<p>Periodic</p>
<p>C. Method of monitoring: Maintenance & Operating Logs and Annual Reports to the District</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</p> <p>Condition 1 – The IC engine driven fire pump was disconnected from its fuel source on March 2015 and has not operated since that date</p> <p>Condition 2 - Operation hours are logged monthly</p> <p>Condition 3 – The IC engine is no longer connected to a fuel source and therefore non-operational.</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</p> <p>Condition 1 - Only CARB Diesel Fuel is used at the facility</p> <p>Condition 2 – Hours of maintenance, testing and operation of the emergency generator is limited to 20 hr/yr and logged monthly</p> <p>Condition 3 - Records of operation and fuel purchased (type and quantity) are maintained on site</p>	<p>Periodic</p>
<p>C. Method of monitoring: Purchase Records and Operation Log</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



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Period Covered by Compliance Certification: 01/01/2018 (MM/DD/YY) to 12/31/2018 (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>B. Description: Stationary Gas Turbines</p> <p>Major Electric Generating Units 1 & 2 and Stationary Gas Turbines at Mandalay Generating Station did not operate in 2018 and were permanently retired in 2018.</p>	<p>Periodic</p>
<p>C. Method of monitoring: Operating Logs</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Non-resettable totalizing hour meter</p>
	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Attachment 103N1-13, Conditions #1 - #3</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Continuous Monitoring Systems</p> <p>Conditions 1, 2 – A CEMS system was operated and maintained at the station Units 1 and 2 which meets the requirements of Rule 103.A.1 and 103.C.1.</p> <p>Condition 3 – Monitored violations are reported to the District within 96 hours.</p>	<p>Continuous</p>
<p>C. Method of monitoring: CEMs Inspection, Maintenance, Testing, and Reporting Records</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Attachment 103N1-13, Conditions #4 - #6</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Continuous Monitoring Systems</p> <p>Condition 4 – Permanent CEMS records are maintained as required.</p> <p>Condition 5 – Data is reduced according to Appendix F of 40 CFR Part 75.</p> <p>Condition 6 - CEMS and excess emission reports are submitted to the District quarterly.</p>	<p>Continuous</p>
<p>C. Method of monitoring: CEMs Inspection, Maintenance, Testing, and Reporting Records</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2018 (MM/DD/YY) to 12/31/2018 (MM/DD/YY)

Mandalay Generating Station

<p>A. Attachment # or Permit Condition #: Attachment RICE MACT, Conditions #1 - #2</p>	<p>D. Frequency of monitoring:</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>Periodic</p>
<p>C. Method of monitoring: Maintenance 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 RICE MACT, Conditions #3 - #9</p>	<p>D. Frequency of monitoring:</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 for maintenance, testing an emergency demand response and upto 50 hours/yr. for non-emergency situations.</p>	<p>Continuous</p>
<p>C. Method of monitoring: Maintenance 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 #: PO00013PC1, Conditions #1 - #2</p>	<p>D. Frequency of monitoring:</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. Condition 2 - Mandalay only uses cleaning products in non-refillable aerosol cans and records are maintained onsite.</p>	<p>Continuous</p>
<p>C. Method of monitoring: Rules 26 and 29 Fuel Throughput/Consumption and Rule 29 Solvent Usage Records</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p>
	<p>G. Compliance Status? (C or I): <u>C</u></p>
	<p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/01/2018 (MM/DD/YY) to 12/31/2018 (MM/DD/YY)

Mandalay Generating Station

<p>A. Attachment # or Permit Condition #: PO00013PC2, Conditions #1 - #2</p>	<p>D. Frequency of monitoring:</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. Major Electric Generating Units 1 & 2 and Stationary Gas Turbines at Mandalay Generating Station did not operate in 2018 and were permanently retired in 2018. The Title V permit has been terminated and the facility has been removed from the Acid Rain Program.</p>	<p>Continuous</p>
<p>C. Method of monitoring: Fuel Usage 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 50, Conditions #1 – #4</p>	<p>D. Frequency of monitoring:</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. Emergency Generator Opacity readings were not performed on Units 1, 2, Stationary Gas Turbines, and bead blaster in 2018 because they did operate and were permanently retired in 2018. Opacity readings were performed on the Emergency Generator as required.</p>	<p>Periodic</p>
<p>C. Method of monitoring: Routine Visual Surveillance and Certification Records</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable EPA Method 9</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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Period Covered by Compliance Certification: 01/01/2018 (MM/DD/YY) to 12/31/2018 (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>Periodic</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>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable 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 54.B.2, Conditions #1 - #4</p>	<p>D. Frequency of monitoring:</p> <p>Annually</p>
<p>B. Description: Sulfur Compounds Ground Level</p> <p>Units 1, 2, and the Stationary Gas Turbines 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>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Recordkeeping and natural gas sample 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 55, Conditions #1 - #7</p>	<p>D. Frequency of monitoring:</p> <p>Periodic</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>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Onsite Operations Review - Permit Condition Not Currently Applicable</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>



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Mandalay Generating Station

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

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

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



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Mandalay Generating Station

<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>N/A</u></p>
	<p>G. Compliance Status? (C or I): <u>N/A</u></p>
	<p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N/A</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>N/A</u></p>
	<p>G. Compliance Status? (C or I): <u>N/A</u></p>
	<p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N/A</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:</p>
<p>B. Description: Abrasive Blasting</p> <p>Although the bead blaster did not operate in 2018 monthly hour meter records are available for review at the plant.</p>	<p>Periodic</p>
<p>C. Method of monitoring: Operating Log Records; Routine Surveillance of Bead Blaster</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Attachment 74.2, Conditions #1 - #6</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Architectural Coatings</p> <p>The Facility did not apply any architectural coatings in 2018.</p>	<p>Continuous</p>
<p>C. Method of monitoring: Routine Surveillance of Paint Usage and Activity Records</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Attachment 74.29N3, Conditions #1 - #14</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Soil Decontamination Operations</p> <p>No soil decontamination operations took place at the Mandalay Generating Station.</p>	<p>N/A</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 40CFR61.M, Conditions #1 - #2</p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: Asbestos Standard Inspection, Notification, and Contractor Records are maintained onsite.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Inspection, Notification, and Contractor Records</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Attachment Part 70 General, Conditions #1 - #3</p>	<p>D. Frequency of monitoring: Continuous</p>
<p>B. Description: General Part 70 Permit Conditions Condition 1 - Compliance status of each federally enforceable condition is reviewed. Condition 2 - Facility strives to comply with all applicable conditions. Condition 3 - Facility acknowledges deviations from Part 70 requirements are to be reported within 4 hours.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Title V Reports and Periodic Review of Requirements</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Attachment Part 70 General, Conditions #4 - #7</p>	<p>D. Frequency of monitoring: Continuous</p>
<p>B. Description: General Part 70 Permit Conditions Condition 4 - It is understood that the need to halt or reduce activity is not a defence in an enforceable action. Condition 5 - All records, monitoring data and support documentation shall be maintained for 5 years from the date the documents were created. Condition 6 - District-requested information will be provided in a timely manner. Condition 7 - District shall have site access for inspection of records and equipment.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Title V Reports and Periodic Review of Requirements</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: Attachment Part 70 General, Conditions #8 - #10</p>	<p>D. Frequency of monitoring:</p> <p style="text-align: center;">Continuous</p>
<p>B. Description: General Part 70 Permit Conditions Condition 8 - Facility understands that the permit may be modified, revoked, reopened, reissued, or terminated for cause Condition 9 - Facility understands that the permit may be reopened by the District under specific conditions. Condition 10 - Facility strives to pay all fees to maintain the permit active.</p> <p>Generating Units at the facility did not operate and were permanently retired in 2018. The facility Part 70 Permit to Operate expired on Dec. 31, 2018 and is no longer in effect.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Title V Reports and Periodic Review of Requirements</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Attachment Part 70 General, Conditions #11 - #13</p>	<p>D. Frequency of monitoring:</p> <p style="text-align: center;">Continuous</p>
<p>B. Description: General Part 70 Permit Conditions Condition 11 - Facility recognizes that the permit does not provide specific property rights. Condition 12 - Facility recognizes that the permit provisions are severable. Condition 13 - Facility recognizes that an application for permit renewal is required no more than 18 months and no less than 6 months prior to the expiration date</p> <p>Generating Units at the facility did not operate and were permanently retired in 2018. The facility Part 70 Permit to Operate expired on Dec. 31, 2018 and is no longer in effect.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Title V Reports and Periodic Review of Requirements</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Attachment Part 70 General, Conditions #14 - #15</p>	<p>D. Frequency of monitoring:</p> <p style="text-align: center;">Continuous</p>
<p>B. Description: General Part 70 Permit Conditions Condition 14 - Facility recognizes that any document submitted on behalf of this permit must be certified by a responsible official. Condition 15 - Facility submits a certification of compliance with all applicable requirements to the District and EPA on an annual basis.</p> <p>Generating Units at the facility did not operate and were permanently retired in 2018. The facility Part 70 Permit to Operate expired on Dec. 31, 2018 and is no longer in effect.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
<p>C. Method of monitoring: Title V Reports and Periodic Review of Requirements</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



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Mandalay Generating Station

<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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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



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<p>A. Attachment # or Permit Condition #: Attachment 40CFR68RMP-13</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Risk Management Plan The site has a current and complete Risk Management Plan.</p>	<p>Annually</p>
<p>C. Method of monitoring: Risk Management Plan Documentation and Review</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Attachment 40CFR72-78</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Acid Rain Program Facility maintains records to ensure compliance with monitoring, emission limits, recordkeeping, and reporting requirements. Major Electric Generating Units 1 & 2 at Mandalay Generating Station did not operate in 2018 and were permanently retired in 2018. They have also been removed from the Acid Rain Program.</p>	<p>Continuous</p>
<p>C. Method of monitoring: Periodic Review of Requirements</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable N/A</p>
	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Attachment 40CFR82</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Protection of Stratospheric Ozone Certified contractors are used to conduct any air conditioning work in the plant.</p>	<p>Continuous</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>



ANNUAL COMPLIANCE CERTIFICATION

SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 01/01/2018 (MM/DD/YY) to 12/31/2018 (MM/DD/YY)

A. Emission Unit Description: Mandalay Unit 1 Unit 1 did not operate and was permanently retired in 2018.			B. Pollutant: NOx
C. Measured Emission Rate: N/A	D. Limited Emission Rate: N/A	E. Specific Source Test or Monitoring Record Citation: N/A	F. Test Date: N/A

A. Emission Unit Description: Mandalay Unit 1 Unit 1 did not operate and was permanently retired in 2018.			B. Pollutant: NH3
C. Measured Emission Rate: N/A	D. Limited Emission Rate: N/A	E. Specific Source Test or Monitoring Record Citation: N/A	F. Test Date: N/A

A. Emission Unit Description: Mandalay Unit 2 Unit 2 did not operate and was permanently retired in 2018.			B. Pollutant: NOx
C. Measured Emission Rate: N/A	D. Limited Emission Rate: N/A	E. Specific Source Test or Monitoring Record Citation: N/A	F. Test Date: N/A

A. Emission Unit Description: Mandalay Unit 2 Unit 2 did not operate and was permanently retired in 2018.			B. Pollutant: NH3
C. Measured Emission Rate: N/A	D. Limited Emission Rate: N/A	E. Specific Source Test or Monitoring Record Citation: N/A	F. Test Date: N/A

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: 01/01/2018 (MM/DD/YY) to 12/31/2018 (MM/DD/YY)

A. Attachment # or Permit Condition #: No deviations in 2018	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:	

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:	