
COMPLIANCE CERTIFICATION

Based on information and belief formed after reasonable inquiry, the statements and information in the attached Compliance Monitoring Report are true, accurate, and complete.

Certification Period: March 1, 2015 – August 31, 2015

Facility: Facility #A0012
NRG Delta LLC
Pittsburg Generating Station
696 West 10th Street
Pittsburg, CA 94565

Name of Responsible Official: Lawrence Penn

Signature:



Date:

9/24/2015

Pittsburg Generating Station, Facility No. A0012
Semi-Annual Title V Compliance Monitoring Report
Summary of Instances of Non-Compliance
March 1, 2015 - August 31, 2015

Deviation Item No.	Permitted Source	Requirement or Limit	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken
			Start		End				
			Date	Time	Date	Time			
1	S-5	BAAQMD Regulation 9-11-309.1, 0.018 lbs/MMBTU system-wide average on a clock hour average	4/27/15	0800	4/27/15	0859	1	DCS I/O Card Failure causing SCR System to Trip	Replace DCS I/O Card and re-start SCR System

Table VII-A
Applicable Limits & Compliance Monitoring Requirements
S-5, Boiler No. 5, Power Generation
S-6, Boiler No. 6, Power Generation
S-7, Boiler No. 7, Power Generation
March 1, 2015 - August 31, 2015

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD Regulation 6 6-1-301	Y		Ringelmann No. 1 during any 3 min/hr	None	N	N/A	X	
	SIP Regulation 6-301	Y		> Ringelmann No. 1 for no more than 3 min/hr	None	N	N/A	X	
	BAAQMD Regulation 6 6-1-304	Y		Ringelmann No. 2 during tube cleaning	None	N	N/A	X	
	SIP Regulation 6-304	Y		> Ringelmann No. 2 during tube cleaning for no more than 3 min/hr	None	N	N/A	X	
Opacity	40 CFR 75	Y		None	40 CFR 75.14(c)	N		X	
FP	BAAQMD Regulation 6-1-310.3	Y		0.15 grains/dscf @ 6% O ₂	None	N	N/A	X	
FP	SIP Regulation 6-310.3	Y		0.15 grains/dscf @ 6% O ₂	None	N	N/A	X	
SO ₂	BAAQMD Regulation 9-1-301	Y		Ground Level Concentration of 0.5 ppm for 3 minutes or 0.25 ppm for 60 minutes or 0.05 ppm for 24 hours	None	N	N/A	X	
SO ₂	BAAQMD Regulation 9-1-302	Y		300 ppmvd	None	N	N/A	X	
SO ₂	40 CFR 75	Y		None	40 CFR 75	P/Q	calculations	X	
NO _x	BAAQMD Regulation 9-3-301	N		175 ppmv @ 3% O ₂ (dry basis) for natural gas firing	BAAQMD Regulation 1-520.1 9-11-501, 503	C	CEMS	X	

Table VII-A
Applicable Limits & Compliance Monitoring Requirements
S-5, Boiler No. 5, Power Generation
S-6, Boiler No. 6, Power Generation
S-7, Boiler No. 7, Power Generation
March 1, 2015 - August 31, 2015

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
NOx	BAAQMD Regulation 9-11-302.1.1	Y		175 ppmv @ 3% O ₂ (dry basis) for natural gas firing based on a clock hour average	BAAQMD Regulation 1-520.1 9-11-501, 503	C	CEMS	X	
NOx	BAAQMD Regulation 9-11-308	Y		0.28 lbs/MMBTU system-wide average over previous 30 days	BAAQMD Regulation 1-520.1 9-11-501, 503	C	CEMS	X	
NOx	BAAQMD Regulation 9-11-309.1	N		0.018 lbs/MMBTU system-wide average on a clock hour average	BAAQMD Regulation 1-520.1 9-11-501, 503	C	CEMS		X (4/27/15, Hour 08)
NOx	40 CFR 75	Y		None	40 CFR 75	C	CEMS	X	
CO	BAAQMD Regulation 9-11-310.1	Y		400 ppmv @ 3% O ₂ (dry basis) during steady state compliance tests	BAAQMD Regulation 9-11-501, 503	C	CEMS	X	
CO	BAAQMD Regulation 9-11-310.2	Y		1000 ppmv @ 3% O ₂ (dry basis) during normal operation on a clock hour average	BAAQMD Regulation 9-11-501, 503	C	CEMS	X	
Ammonia	BAAQMD Regulation 9-11-311	Y		10 ppmv @ 3% O ₂ (dry basis) based on rolling 60 minute average upon SCR	BAAQMD Regulation 9-11-402	P/Q	Quarterly tests	X	

Table VII-B
Applicable Limits & Compliance Monitoring Requirements
S-36 EMERGENCY DIESEL GENERATOR
S-49, S-51 AND S-53 DIESEL FIRE PUMPS
March 1, 2015 - August 31, 2015

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
FP	BAAQMD Regulation 6-1-303.1	N		Ringelmann No. 2.0 for no more than 3 min/hr	BAAQMD Regulation 6-1-401	P/W	Visible Inspection during reliability testing	X	
FP	SIP Regulation 6-303.1	Y		> Ringelmann No. 2 for no more than 3 min/hr	BAAQMD Regulation 6-1-401	P/W	Visible Inspection during reliability testing	X	
FP	BAAQMD Regulation 6-1-310.1	N		0.15 gr/dscf	None	N	None	X	
FP	SIP Regulation 6-310.1	Y		0.15 gr/dscf	None	N	N/A	X	
SO ₂	BAAQMD Regulation 9-1-301	Y		Property Line Ground Level Limits: < 0.5 ppm for 3 minutes and < 0.25 ppm for 60 min. and < 0.05 ppm for 24 hours	None	N	None	X	
SO ₂	BAAQMD Regulation 9-1-304	Y		Fuel Sulfur Limit 0.5%	None	P/M	None	X	
Operating Time	BAAQMD Regulation 9-8-330.2 Condition #22820, Part 1	N	Until 1/1/2012	20 hours per year	BAAQMD Condition # 22820, Part 4	P/D	Records	X	
Operating Time	BAAQMD Regulation 9-8-330.2 Condition #22834	N	Until 1/1/2012	34 hours per year	BAAQMD Condition # 22834 Part 4	P/D	Records	X	
Operating Time	BAAQMD Regulation 9-8-330.3	N	Effective 1/1/2012	20 hours per year	BAAQMD Regulation 9-8-502, 530	P/D	Records	X	
Operating Time	BAAQMD Regulation 9-8-330.3	N	Effective 1/1/2012	34 hours per year	BAAQMD Regulation 9-8-502, 530	P/D	Records	X	

Table VII-C
Applicable Limits & Compliance Monitoring Requirements
S-58, Service Station
March 1, 2015 - August 31, 2015

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
VOC	BAAQMD Regulation 8-7-301.10	Y		Installed & modified only if the system is 98% controlled or highest vapor recovery rate specified by CARB		Event	CARB Re-Certification	X	
VOC	BAAQMD Regulation 8-7-301.6	Y		Leak Free & Vapor Tight on Phase I equipment	BAAQMD Regulation 8-7-301.13	P/A	Source Test	X	
VOC	BAAQMD Regulation 8-7-302.8	Y		Minimum liquid removal rate of 5 ml/gal		N		X	
VOC	BAAQMD Regulation 8-7-302.10	Y		Connector between riser and dispenser < 1 inch diameter		N	Visual Check	X	
VOC	BAAQMD Regulation 8-7-302.12	Y		Liquid retain in nozzle < 100 ml/1000gal		N		X	
VOC	BAAQMD Regulation 8-7-302.13	Y		Spitting from nozzle < 1 ml/nozzle		N		X	
VOC	BAAQMD Regulation 8-7-302.14.2	Y		Dynamic back pressure < 0.15, 0.45, 0.95" water when measure nitrogen flow rate of 20, 60 and 100 CFH	BAAQMD Regulation 8-7-302.14	P/A	Source Test	X	
Fuel Throughput	BAAQMD Permit Condition #6583	N		1.7 million gallons in any 12 consecutive months	BAAQMD Regulation 8-7-503	P/M	Records	X	

Table VII-D
Applicable Limits & Compliance Monitoring Requirements
S-62, Oil-Water Separator
S-63, Dissolved Air Flotation Unit (DAF)
March 1, 2015 - August 31, 2015

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
VOC	BAAQMD Regulation 8-8-112	Y		1.0 ppm critical organic compounds	BAAQMD Regulation 8-8-502	P/ Semi-annual	Sampling	X	
VOC	SIP Regulation 8-8-112	Y		1.0 ppm critical organic compounds	SIP Regulation 8-8-502	P/ Semi-annual	Sampling	X	
Wastewater Throughput	BAAQMD Permit Condition #10431, #Part 1	N		50 million gallons in any 12 consecutive months	BAAQMD Permit Condition #10431, Part #3	C	Flow Meter	X	
Stormwater Throughput	BAAQMD Permit Condition #10431, Part #2	N		90.72 million gallons in any 12 consecutive months	BAAQMD Permit Condition #10431, Part #3	C	Flow Meter	X	

Table VII-E
Applicable Limits & Compliance Monitoring Requirements
S-70, Paint Spray Operation - Maintenance
March 1, 2015 - August 31, 2015

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
VOC	BAAQMD Regulation 8-3-301	N		VOC Contain Limits Table 1	BAAQMD Regulation 8-3-401.3	P/E	Labeling	X	
VOC	BAAQMD Regulation 8-3-301	N	1/1/2011	VOC Contain Limits Table 2	BAAQMD Regulation 8-3-401.3	P/E	Labeling	X	
VOC	SIP Regulation 8-3-301	Y		content of coating less than 250 grams per liter	SIP Regulation 8-3-401.3	P/E	Labeling	X	
VOC	BAAQMD Regulation 8-3-302.14	N		content of coating less than 250 grams per liter	BAAQMD Regulation 8-3-401.3	P/E	Labeling	X	
VOC	BAAQMD Regulation 8-3-302.2	N	1/1/2011	content of coatings < specified VOC content	BAAQMD Regulation 8-3-401.3	P/E	Labeling	X	
VOC	SIP Regulation 8-3-302	Y		content of coatings < specified VOC content	SIP Regulation 8-3-401.3	P/E	Labeling	X	
VOC	BAAQMD Regulation 8-3-304	Y		content of coatings < specified VOC content	Regulation 8-3-403	P/E	Labeling	X	
VOC	BAAQMD Regulation 8-19-302	Y		content of air dried coating < 2.8 lb/gal	BAAQMD Regulation 8-19-501	P/E	Records	X	
VOC	BAAQMD Regulation 8-19-312	Y		content of coatings < specified VOC content	BAAQMD Regulation 8-19-501	P/E	Records	X	
Coating usage	BAAQMD Permit Condition #8425, Part #1	Y		6500 gallons in any 12 consecutive months	BAAQMD Permit Condition #8425, Part #3	P/E	Records	X	
Cleanup Solvent usage	BAAQMD Permit Condition #8425, Part #2	Y		500 gallons in any 12 consecutive months	BAAQMD Permit Condition #8425, Part #3	P/E	Records	X	

Table VII-F
Applicable Limits & Compliance Monitoring Requirements
S-71, Solvent Wipe Cleaning Operation
March 1, 2015 - August 31, 2015

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
VOC		N			BAAQMD 8-16-501	P/M	Records	X	
		Y			SIP 8-16-501	P/M	Records	X	
VOC	SIP 8-16-304	Y		Trichloroethylene usage \leq 3.2 gallons per day	8-16-501	P/E	Records	X	
Solvent Usage	BAAQMD Permit Condition #8427 part #1	Y		150 gallons in any 12 consecutive months	BAAQMD Permit Condition 8427 part 3	P/E	Records	X	

Table VII-G
Applicable Limits & Compliance Monitoring Requirements
S-72, Sand Blasting Facility
March 1, 2015 - August 31, 2015

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD Regulation 6-1-301 And BAAQMD Permit Condition 13445 part 5	Y		Ringelmann 1 for 3 minutes/hr	BAAQMD Condition 13345, Part 3	C	Differential Pressure Failure Warning System	X	
Opacity	SIP Regulation 6-301 And	Y		Ringelmann 1 for 3 minutes/hr		C	Differential Pressure Failure Warning System	X	
FP	BAAQMD Regulation 6-1-310	Y		No emissions from source > 0.15 grains per dscf of gas volume	BAAQMD Condition 13345, Part 3	C	Differential Pressure Failure Warning System	X	
FP	SIP Regulation 6-310	Y		No emissions from source > 0.15 grains per dscf of gas volume		C	Differential Pressure Failure Warning System	X	
Abrasive Usage (Annual)	BAAQMD Permit Condition 13445 part 1	Y		384 tons in any 12 consecutive months	BAAQMD Permit Condition 13445 part 4	P/E	Records	X	
Abrasive Usage (Daily)	BAAQMD Permit Condition 13445 part 2	Y		16 ton/day	BAAQMD Permit Condition 13445 part 4	P/E	Records	X	

Table VII - H
Applicable Limits & Compliance Monitoring Requirements
S-73 AND S-74, COOLING TOWERS
March 1, 2015 - August 31, 2015

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD Regulation 6-1-301	Y		< Ringelmann 1 for more than 3 min/hr		N	None	X	
Opacity	SIP Regulation 6-301	Y		> Ringelmann No. 1 for no more than 3 min/hr	None	N	N/A	X	
Particulate Weight	BAAQMD Regulation 6-1-310	Y		0.15 grains per dscf		N	None	X	
Particulate Weight	SIP Regulation 6-310	Y		0.15 grains per dscf		N	None	X	