



OCT 12 2016

NRG Reliability Solutions
17685 Juniper Path; Suite 301
Lakeville, MN 55044
612-564-1973

October 5, 2016

Mr. Michael Langman
Environmental Scientist
Air and Radiation Division
Air Permits Section
Air Programs Branch (AR-18J)
U.S. EPA Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

**RE: Application for a Significant Permit Modification
Treasure Island Resort & Casino
Permit No. V-PI-2704900084-2012-12**

Dear Mr. Langman:

NRG Reliability Solutions (NRG) is submitting application forms for a significant permit modification to change the testing frequency required by 40 CFR 63 Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE NESHAP).

The carbon monoxide (CO) testing frequency in the permit is currently every 8,760 hours or 3 years, whichever comes first (Permit Condition 2.0(B)(7)) for compliance with the RICE NESHAP (40 CFR 63.6615, Table 3 to 40 CFR 63 Subpart ZZZZ.) NRG is requesting to change the CO testing frequency to every 8,760 hours or 5 years, because the engines at Treasure Island are limited use engines. In the RICE NESHAP, limited use engines are those that operate less than 100 hours per year. Table 3 to Subpart ZZZZ includes a provision for testing every 5 years or 8,760 hours, whichever comes first, for limited use engines.

The engines at Treasure Island have run less than 100 hours per year since the compliance date of the RICE NESHAP, May 3, 2013. A table showing the monthly and 12-month rolling engine run hours is included with the permit application. If the engines run for more than 100 hours in future years, the testing frequency could revert to every 3 years. The permit condition could read:

7. CO Performance Testing Interval
 - (i) The Permittee shall conduct subsequent performance tests according to the following schedule [40 C.F.R. § 63.6615]:

Mr. Michael Langman
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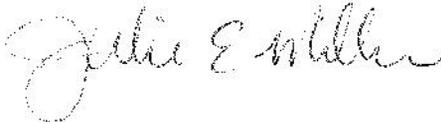
- a. For each RICE that is not a limited use stationary RICE, the Permittee shall conduct subsequent performance tests every 8,760 hours or 3 years, whichever comes first. [40 C.F.R. Part 63, Subpart ZZZZ, Table 3.4]
- b. For each RICE that is a limited use stationary RICE, the Permittee shall conduct subsequent performance tests every 8,760 hours or 5 years, whichever comes first. [40 C.F.R. Part 63, Subpart ZZZZ, Table 3.5]

As requested in your email dated Thursday, September 22, NRG has attached the General Information and Summary (GIS), Emission Unit Description for Combustion Sources (EUD1), Initial Compliance Plan and Compliance Certification (i-COMP), and the signed Certification of Truth, Accuracy, and Completeness (CTAC) forms for the permit modification.

The initial CO performance test was completed on April 9, 2014. Subsequent testing under the current permit is required by April 9, 2017 with a test notification and test plan due by February 8, 2017. We would really appreciate it if this permit modification could be processed before February so we could avoid the additional testing expense.

Thank you for your attention to this request. If you have any questions, please contact me at (612) 564-1962 (julie.miller@nrg.com) or Phil Kairis at (651) 341-2244 (phil.kairis@nrg.com).

Sincerely,



Julie E. Miller, PE
Environmental Specialist

Enclosures

C: Phil Kairis, NRG Reliability Solutions

Application for a Significant Permit Modification

NRG Reliability Solutions LLC

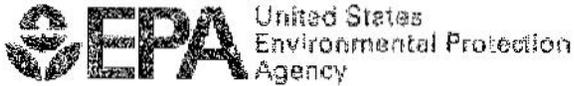
Treasure Island Resort & Casino, Red Wing, Minnesota



**Application for a Significant Permit Modification
Treasure Island Resort & Casino**

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OMB No. 2060-0336,
Approval Expires 05/31/2019

**Federal Operating Permit Program (40 CFR Part 71)
CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS (CTAC)**

This form must be completed, signed by the "Responsible Official" designated for the facility or emission unit, and sent with each submission of documents (i.e., application forms, updates to applications, reports, or any information required by a part 71 permit).

A. Responsible Official

Name: (Last) Kairis (First) Phillip (MI)

Title Vice President

Street or P.O. Box 17685 Juniper Path, Suite 301

City Lakeville State MN ZIP 55044 -

Telephone (651) 341 - 2244 Ext. Facsimile (952) 892 - 9248

B. Certification of Truth, Accuracy and Completeness (to be signed by the responsible official)

I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Name (signed) 

Name (typed) Phillip Kairis Date: 10/5/16



DESCRIPTION OF MODIFICATION

NRG Reliability Solutions (NRG) is submitting this permit application for a significant permit modification to change the testing frequency required by 40 CFR 63 Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE NESHAP).

The carbon monoxide (CO) testing frequency in Permit No. V-PI-2704900084-2012-12 is currently every 8,760 hours or 3 years, whichever comes first (Permit Condition 2.0(B)(7)) for compliance with the RICE NESHAP (40 CFR 63.6615, Table 3 to 40 CFR 63 Subpart ZZZZ.) NRG is requesting to change the CO testing frequency to every 8,760 hours or 5 years, because the engines at Treasure Island are limited use engines. In the RICE NESHAP, limited use engines are those that operate less than 100 hours per year. Table 3 to Subpart ZZZZ includes a provision for testing every 5 years or 8,760 hours, whichever comes first, for limited use engines.

The engines at Treasure Island have run less than 100 hours per year since the compliance date of the RICE NESHAP, May 3, 2013. A table showing the monthly and 12-month rolling engine run hours is included as Appendix A in this permit application. If the engines run for more than 100 hours in future years, the testing frequency could revert to every 3 years. Suggested permit language is as follows:

7. CO Performance Testing Interval
 - (i) The Permittee shall conduct subsequent performance tests according to the following schedule [40 C.F.R. § 63.6615]:
 - a. For each RICE that is not a limited use stationary RICE, the Permittee shall conduct subsequent performance tests every 8,760 hours or 3 years, whichever comes first. [40 C.F.R. Part 63, Subpart ZZZZ, Table 3.4]
 - b. For each RICE that is a limited use stationary RICE, the Permittee shall conduct subsequent performance tests every 8,760 hours or 5 years, whichever comes first. [40 C.F.R. Part 63, Subpart ZZZZ, Table 3.5]

This application for a permit modification does not request any changes to the emissions limits or operating hours limits in the current permit.

Federal Operating Permit Program (40 CFR Part 71)
GENERAL INFORMATION AND SUMMARY (GIS)

A. Mailing Address and Contact Information

Facility name Treasure Island Resort & Casino
Mailing address: Street or P.O. Box NRG Reliability Solutions, 17685 Juniper Path, Suite 301
City Lakeville State MN ZIP 55044 -
Contact person: Julie Miller Title Environmental Specialist
Telephone (612) 564 - 1962 Ext. _____
Facsimile (952) 892 - 9248

B. Facility Location

Temporary source? Yes No Plant site location _____
5734 Sturgeon Lake Road
City Red Wing State MN County Goodhue EPA Region 5
Is the facility located within:
Indian lands? YES NO An offshore source in federal waters? YES NO
Non-attainment area? YES NO If yes, for what air pollutants? _____
Within 50 miles of affected State? YES NO If yes, What State(s)? WI

C. Owner

Name NRG Reliability Solutions, LLC Street/P.O. Box 17685 Juniper Path, Suite 301
City Lakeville State MN ZIP 55044 -
Telephone (612) 564 - 1973 Ext _____

D. Operator

Name Same as Owner Street/P.O. Box _____
City _____ State _____ ZIP _____ -
Telephone (_____) _____ - _____ Ext _____

E. Application Type

Mark only one permit application type and answer the supplementary question appropriate for the type marked.

Initial Permit Renewal Significant Mod Minor Permit Mod(MPM)

Group Processing, MPM Administrative Amendment

For initial permits, when did operations commence? ____ / ____ / ____

For permit renewal, what is the expiration date of current permit? ____ / ____ / ____

F. Applicable Requirement Summary

Mark the types of applicable requirements that apply:

SIP FIP/TIP PSD Non-attainment NSR

Minor source NSR Section 111 Phase I acid rain Phase II acid rain

Stratospheric ozone OCS regulations NESHAP Sec. 112(d) MACT

Sec. 112(g) MACT Early reduction of HAP Sec 112(j) MACT RMP [Sec.112(r)]

Section 129 NAAQS, increments or visibility but for temporary sources (This is rare)

Is the source subject to the Deepwater Port Act? YES NO

Has a risk management plan been registered? YES NO Agency _____

Phase II acid rain application submitted? YES NO If YES, Permitting Authority _____

G. Source-Wide PTE Restrictions and Generic Applicable Requirements

Cite and describe any emissions-limiting requirements and/or facility-wide "generic" applicable requirements.

Permit No. V-PI-2704900084-2012-12, Section 2.0 (A) Emission Limitations and Standards

1.i. Total NO_x emissions from each engine shall not exceed 6.55 g/bhp-hr.

ii. Total NO_x emissions from each engine shall not exceed 37.44 lb/hr.

iii. Total NO_x emissions from each engine shall not exceed 10.30 tons/year.

2. Total operating hours of each engine shall not exceed 550 hrs/year, based on a 12-month rolling sum.

10. Limit the CO concentration in the engine exhaust to 23 ppmvd at 15% O₂ or reduce CO emissions by 70% or more.

H. Process Description

List processes, products, and SIC codes for the facility.

Process	Products	SIC
Electricity Generation		4911

I. Emission Unit Identification

Assign an emissions unit ID and describe each emissions unit at the facility. Control equipment and/or alternative operating scenarios associated with emissions units should be listed on a separate line. Applicants may exclude from this list any insignificant emissions units or activities.

Emissions Unit ID	Description of Unit
EU-01	Internal Combustion Engine (diesel-fired); Caterpillar 3516B
EU-02	Internal Combustion Engine (diesel-fired); Caterpillar 3516B
EU-03	Internal Combustion Engine (diesel-fired); Caterpillar 3516B
EU-04	Internal Combustion Engine (diesel-fired); Caterpillar 3516B
CE-01	Diesel Oxidation Catalyst
CE-02	Diesel Oxidation Catalyst
CE-03	Diesel Oxidation Catalyst
CE-04	Diesel Oxidation Catalyst

J. Facility Emissions Summary

Enter potential to emit (PTE) for the facility as a whole for each regulated air pollutant listed below. Enter the name of the single HAP emitted in the greatest amount and its PTE. For all pollutants, stipulations to major source status may be indicated by entering "major" in the space for PTE. Indicate the total actual emissions for fee purposes for the facility in the space provided. Applications for permit modifications need not include actual emissions information.

NOx	<u>41.2</u>	tons/yr	VOC	<u>1.3</u>	tons/yr	SO2	<u>0.03</u>	tons/yr
PM-10	<u>0.80</u>	tons/yr	CO	<u>3.36</u>	tons/yr	Lead	<u>0</u>	tons/yr
Total HAP <u>0.04</u> tons/yr								
Single HAP with greatest amount <u>Benzene</u>							PTE <u>0.014</u> tons/yr	
Total of regulated pollutants (for fee calculation), Sec. F, line 5 of form FEE _____ tons/yr								

K. Existing Federally-Enforceable Permits

Permit number(s)	<u>V-PI-2704900084-2012-12</u>	Permit type	<u>Part 71</u>	Permitting authority	<u>EPA Region 5</u>
Permit number(s)	<u>PSD-PI-2704900084-2012-02</u>	Permit type	<u>PSD</u>	Permitting authority	<u>EPA Region 5</u>

L. Emission Unit(s) Covered by General Permits

Emission unit(s) subject to general permit	_____
Check one:	<input type="checkbox"/> Application made <input type="checkbox"/> Coverage granted
General permit identifier	_____ Expiration Date <u> </u> / <u> </u> / <u> </u>

M. Cross-referenced Information

Does this application cross-reference information? (instructions)	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO	(If yes, see instructions)
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INSTRUCTIONS FOLLOW

Federal Operating Permit Program (40 CFR Part 71)
EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID EU-01 Description Diesel fired internal combustion engine
SIC Code (4-digit) 4911 SCC Code 20100102

B. Emissions Unit Description

Primary use Backup power and peak load management Temporary Source Yes No
Manufacturer Caterpillar Model No. 3516B
Serial Number 7RN01901 Installation Date 05 / 25 / 2001
Boiler Type: Industrial boiler Process burner Electric utility boiler
Other (describe) _____
Boiler horsepower rating _____ Boiler steam flow (lb/hr) _____
Type of Fuel-Burning Equipment (coal burning only):
 Hand fired Spreader stoker Underfeed stoker Overfeed stoker
 Traveling grate Shaking grate Pulverized, wet bed Pulverized, dry bed
Actual Heat Input 16.76 MM BTU/hr Max. Design Heat Input 16.76 MM BTU/hr

C. Fuel Data

Primary fuel type(s) Ultra-low sulfur diesel Standby fuel type(s) NA

Describe each fuel you expected to use during the term of the permit.

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Ultra-low sulfur diesel	0.0015	NA	0.137 MMBtu/gal

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Ultra-low sulfur diesel	3,164 (1)	130.2 gallons	71,610 gallons (2)

- (1) Based on 24 operating hours in 2015 x 130.2 gallons per hour.
- (2) Based on limit of 550 operating hours per year x 130.2 gallons per hour.

E. Associated Air Pollution Control Equipment

Emissions unit ID CE-01 Device type Diesel oxidation catalyst

Air pollutant(s) Controlled CO Manufacturer Universal

Model No. 18-511068 Serial No. _____

Installation date 04 / 09 / 2014 Control efficiency (%) 70+

Efficiency estimation method Stack testing, RICE NESHAP requirement

F. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common).

Stack height (ft) _____ Inside stack diameter (ft) _____

Stack temp (°F) _____ Design stack flow rate (ACFM) _____

Actual stack flow rate (ACFM) _____ Velocity (ft/sec) _____

Federal Operating Permit Program (40 CFR Part 71)
EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID EU-02 Description Diesel fired internal combustion engine
SIC Code (4-digit) 4911 SCC Code 20100102

B. Emissions Unit Description

Primary use Backup power and peak load management Temporary Source Yes No
Manufacturer Caterpillar Model No. 3516B
Serial Number 7RN01825 Installation Date 05 / 25 / 2001
Boiler Type: Industrial boiler Process burner Electric utility boiler
Other (describe) _____
Boiler horsepower rating _____ Boiler steam flow (lb/hr) _____
Type of Fuel-Burning Equipment (coal burning only):
 Hand fired Spreader stoker Underfeed stoker Overfeed stoker
 Traveling grate Shaking grate Pulverized, wet bed Pulverized, dry bed
Actual Heat Input 16.76 MM BTU/hr Max. Design Heat Input 16.76 MM BTU/hr

C. Fuel Data

Primary fuel type(s) Ultra-low sulfur diesel Standby fuel type(s) NA

Describe each fuel you expected to use during the term of the permit.

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Ultra-low sulfur diesel	0.0015	NA	0.137 MMBtu/gal

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Ultra-low sulfur diesel	3,177 (1)	130.2 gallons	71,610 gallons (2)

- (1) Based on 24 operating hours in 2015 x 130.2 gallons per hour.
- (2) Based on limit of 550 operating hours per year x 130.2 gallons per hour.

E. Associated Air Pollution Control Equipment

Emissions unit ID CE-02 Device type Diesel oxidation catalyst

Air pollutant(s) Controlled CO Manufacturer Universal

Model No. 18-511068 Serial No. _____

Installation date 04 / 09 / 2014 Control efficiency (%) 70+

Efficiency estimation method Stack testing, RICE NESHAP requirement

F. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common).

Stack height (ft) _____ Inside stack diameter (ft) _____

Stack temp (°F) _____ Design stack flow rate (ACFM) _____

Actual stack flow rate (ACFM) _____ Velocity (ft/sec) _____

Federal Operating Permit Program (40 CFR Part 71)
EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID EU-03 Description Diesel fired internal combustion engine
SIC Code (4-digit) 4911 SCC Code 20100102

B. Emissions Unit Description

Primary use Backup power and peak load management Temporary Source Yes No
Manufacturer Caterpillar Model No. 3516B
Serial Number 7RN01827 Installation Date 05 / 25 / 2001
Boiler Type: Industrial boiler Process burner Electric utility boiler
Other (describe) _____
Boiler horsepower rating _____ Boiler steam flow (lb/hr) _____
Type of Fuel-Burning Equipment (coal burning only):
 Hand fired Spreader stoker Underfeed stoker Overfeed stoker
 Traveling grate Shaking grate Pulverized, wet bed Pulverized, dry bed
Actual Heat Input 16.76 MM BTU/hr Max. Design Heat Input 16.76 MM BTU/hr

C. Fuel Data

Primary fuel type(s) Ultra-low sulfur diesel Standby fuel type(s) NA

Describe each fuel you expected to use during the term of the permit.

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Ultra-low sulfur diesel	0.0015	NA	0.137 MMBtu/gal

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Ultra-low sulfur diesel	3,190 (1)	130.2 gallons	71,610 gallons (2)

- (1) Based on 24.5 operating hours in 2015 x 130.2 gallons per hour.
- (2) Based on limit of 550 operating hours per year x 130.2 gallons per hour.

E. Associated Air Pollution Control Equipment

Emissions unit ID CE-03 Device type Diesel oxidation catalyst

Air pollutant(s) Controlled CO Manufacturer Universal

Model No. 18-511068 Serial No. _____

Installation date 04 / 09 / 2014 Control efficiency (%) 70+

Efficiency estimation method Stack testing, RICE NESHAP requirement

F. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common).

Stack height (ft) _____ Inside stack diameter (ft) _____

Stack temp (°F) _____ Design stack flow rate (ACFM) _____

Actual stack flow rate (ACFM) _____ Velocity (ft/sec) _____

Federal Operating Permit Program (40 CFR Part 71)
EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID EU-04 Description Diesel fired internal combustion engine
SIC Code (4-digit) 4911 SCC Code 20100102

B. Emissions Unit Description

Primary use Backup power and peak load management Temporary Source Yes No
Manufacturer Caterpillar Model No. 3516B
Serial Number 7RN01824 Installation Date 05 / 25 / 2001
Boiler Type: Industrial boiler Process burner Electric utility boiler
Other (describe) _____
Boiler horsepower rating _____ Boiler steam flow (lb/hr) _____
Type of Fuel-Burning Equipment (coal burning only):
 Hand fired Spreader stoker Underfeed stoker Overfeed stoker
 Traveling grate Shaking grate Pulverized, wet bed Pulverized, dry bed
Actual Heat Input 16.76 MM BTU/hr Max. Design Heat Input 16.76 MM BTU/hr

C. Fuel Data

Primary fuel type(s) Ultra-low sulfur diesel Standby fuel type(s) NA

Describe each fuel you expected to use during the term of the permit.

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Ultra-low sulfur diesel	0.0015	NA	0.137 MMBtu/gal

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Ultra-low sulfur diesel	2,799 (1)	130.2 gallons	71,610 gallons (2)

- (1) Based on 21.5 operating hours in 2015 x 130.2 gallons per hour.
- (2) Based on limit of 550 operating hours per year x 130.2 gallons per hour.

E. Associated Air Pollution Control Equipment

Emissions unit ID CE-04 Device type Diesel oxidation catalyst

Air pollutant(s) Controlled CO Manufacturer Universal

Model No. 18-511068 Serial No. _____

Installation date 04 / 09 / 2014 Control efficiency (%) 70+

Efficiency estimation method Stack testing, RICE NESHAP requirement

F. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common).

Stack height (ft) _____ Inside stack diameter (ft) _____

Stack temp (°F) _____ Design stack flow rate (ACFM) _____

Actual stack flow rate (ACFM) _____ Velocity (ft/sec) _____



Federal Operating Permit Program (40 CFR Part 71) INITIAL COMPLIANCE PLAN AND COMPLIANCE CERTIFICATION (I-COMP)

SECTION A - COMPLIANCE STATUS AND COMPLIANCE PLAN

Complete this section for each unique combination of applicable requirements and emissions units at the facility. List all compliance methods (monitoring, recordkeeping and reporting) you used to determine compliance with the applicable requirement described above. Indicate your compliance status at this time for this requirement and compliance methods and check "YES" or "NO" to the follow-up question.

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Describe and Cite)

2.0 (A) 1. i. Total nitrogen oxide emissions from each engine shall not exceed 6.55 g/BHP-hr, averaged over the duration of the emission performance test or any three consecutive hours. [Condition 4.1.a. of PSD-PI-R50003-00-01]

Compliance Methods for the Above (Description and Citation):

2.0 (B) 2. Annual NOx testing was conducted on November 16, 2015. The emissions tests demonstrated compliance with the NOx limit for each of the four engines.

Compliance Status:

X In Compliance: Will you continue to comply up to permit issuance? X Yes ___ No

___ Not In Compliance: Will you be in compliance at permit issuance? ___ Yes ___ No

___ Future-Effective Requirement: Do you expect to meet this on a timely basis? ___ Yes ___ No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

2.0 (A) 1. ii. Total nitrogen oxide emissions shall not exceed 37.44 lb/hr per engine, averaged over the duration of the emission performance test or any three consecutive hours. [Condition 4.1.b of PSD-PI-R50003-00-01]

Compliance Methods for the Above (Description and Citation):

2.0 (B) 2. Annual NOx testing was conducted on November 16, 2015. The emissions tests demonstrated compliance with the NOx limit for each of the four engines.

Compliance Status:

X In Compliance: Will you continue to comply up to permit issuance? X Yes ___ No

___ Not In Compliance: Will you be in compliance at permit issuance? ___ Yes ___ No

___ Future-Effective Requirement: Do you expect to meet this on a timely basis? ___ Yes ___ No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

2.0 (A) 1. iii. Total nitrogen oxide emissions shall not exceed 10.30 tons/year per engine, based on a 12-consecutive month rolling sum, determined at the end of each month.

[Condition 4.1.c of PSD-PI-R50003-00-01]

Compliance Methods for the Above (Description and Citation):

2.0 (A) 1. iii. Each month, NOx emissions are calculated for each engine based on the latest emissions test results and monthly operating hours.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

2.0 (A) 2. Total operating hours of each engine shall not exceed 550 hrs/year, based on a 12-consecutive month rolling sum, determined at the end of each month. [Condition 4.1.d of PSD-PI-R50003-00-01]

Compliance Methods for the Above (Description and Citation):

2.0 (A) 2. Each month, the 12-month rolling sum of operating hours for each engine is calculated.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

2.0 (A) 3. The turbocharger and aftercooler shall be in operation at all times that any of the engines are in operation. [Condition 4.1.e of PSD-PI-R50003-00-01]

Compliance Methods for the Above (Description and Citation):

2.0 (B) 3, 4. The turbocharger and aftercooler are continuously monitored. An alarm would notify the operator if there were any malfunction.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

2.0 (A) 4. Lean burn combustion conditions shall be maintained at all times that any of the engines are in operation. [Condition 4.1 .e and 4.1.h of PSD-PI-R50003-00-01]

Compliance Methods for the Above (Description and Citation):

2.0 (C) 2, 3. The engine parameters are continuously monitored. An alarm would notify the operator if there were any malfunctions.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

22.0 (A) 6. The intake manifold pressure of each engine shall be maintained at 28.1 to 76.2 in Hg and 40 to 100 percent load. [Condition 4.1.i of PSD-PI-R50003-00-01]

Compliance Methods for the Above (Description and Citation):

2.0 (B) 4; 3.0 (B) 2. Each engine has had brief deviations from the intake manifold pressure range allowed in the permit. The deviations were previously reported in the semiannual reports. The intake manifold pressure is continuously monitored.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

2.0 (A) 7. The permittee shall retard engine timing at all times for each engine such that the injection of fuel into the engine is delayed. The flash file program #180-1736 shall be set for retard engine timing. [Condition 4.1 .k and 4.1.1 of PSD-PI-R50003-00-01]

Compliance Methods for the Above (Description and Citation):

2.0 (C) 2, 3. The engine parameters are continuously monitored. An alarm would notify the operator if there were a malfunction.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

2.0 (A) 8. The engines shall only burn diesel fuel that meets the following standards :

i. Sulfur content: 15 ppm maximum

ii. A minimum cetane index of 40 or a maximum aromatic content of 35 volume percent.

[40 C.F.R. §§ 63.6604 and 80.510(b)]

Compliance Methods for the Above (Description and Citation):

22.0 (A) 8. NRG Reliability Solutions only purchases ultra-low sulfur diesel fuel for combustion in the engines.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

2.0 (A) 9. At all times, including start-up, shut-down, and malfunction, the permittee shall, to the extent practicable, maintain and operate all sources in a manner consistent with good air pollution control practice for minimizing emissions. [Section 3.0 of PSD-PI-R50003-00-01, 40 C.F.R. § 63.6605]

Compliance Methods for the Above (Description and Citation):

2.0 (B) 2, 3, 4. The engine parameters are continuously monitored. An alarm would notify the operator if there were a malfunction. Calibration and maintenance records are kept for the engines.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

2.0 (A) 9.i. The Permittee shall develop and provide to each facility operator training to orient staff as to the applicable terms and conditions of this permit. The Permittee shall maintain a log of the time, date, and place, and a list of attendees for, each training session. The Permittee shall maintain at the facility or at the main office and make available to an authorized EPA representative, upon request, a copy of the training log, list of attendees, and training materials presented in the training sessions.

Compliance Methods for the Above (Description and Citation):

The air permit conditions are reviewed each year with appropriate personnel.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

2.0 (A) 9.ii. The Permittee shall develop and implement standard operation and maintenance (O&M) procedures for each emission unit listed in this permit. A copy of the procedures shall be readily available to the operators maintaining each emission unit, and authorized EPA representatives.

Compliance Methods for the Above (Description and Citation):

The O&M Manual is available on site and a copy is in the main office.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

2.0 (A) 9.iii. The Permittee shall keep a copy of this permit on file at the facility or at the main office at all times.

Compliance Methods for the Above (Description and Citation):

A copy of the permit is maintained electronically and readily available.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

2.0 (A) 10.i. Carbon Monoxide (CO) Concentration or Reduction:

i. The Permittee shall limit the concentration of CO in the exhaust to 23 ppmvd at 15 percent O₂ or reduce CO emissions by 70% or more at all times except during periods of startup. [40 C.F.R. § 63.6603(a), Table 2d to 40 C.F.R. Part 63, Subpart ZZZZ]

Compliance Methods for the Above (Description and Citation):

2.0 (B) 6. An initial compliance test for CO concentration was conducted on April 8 and 9, 2014.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

2.0 (A) 10.ii. Carbon Monoxide (CO) Concentration or Reduction:

ii. The Permittee shall comply with the CO concentration or reduction limit no later than May 3, 2013 unless EPA grants an extension according to the provisions of 40 C.F.R. § 63.6(i). [40 C.F.R. § 63.6595(a)(1)]

Compliance Methods for the Above (Description and Citation):

2.0 (A) 6. An initial compliance test for CO concentration was conducted on April 8 and 9, 2014. EPA granted NRG Reliability Solutions a one year extension to install control equipment to comply with 40 CFR 63 Subpart ZZZZ.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

2.0 (A) 10.iii. Carbon Monoxide (CO) Concentration or Reduction:

iii. The Permittee will have demonstrated initial compliance if the average CO concentration or average reduction of emissions of CO determined from the initial performance test required in Condition 2.0(B).6 achieves the required CO concentration or CO percent reduction. [40 C.F.R. § 63.6630(a), Table 5 to 40 C.F.R. Part 63, Subpart ZZZZ]

Compliance Methods for the Above (Description and Citation):

2.0 (B) 6. An initial compliance test for CO concentration was conducted on April 8 and 9, 2014.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

2.0 (A) 10.iv. Carbon Monoxide (CO) Concentration or Reduction:

iv. The Permittee shall demonstrate continuous compliance if performance testing conducted as required in Condition 2.0(B).7 shows that the CO emissions concentration or reduction meets the concentration or percent reduction as required Condition 2.0(A).10.(i) of this permit. [40 C.F.R. § 63.6640(a), Table 6 to 40 C.F.R. Part 63, Subpart ZZZZ]

Compliance Methods for the Above (Description and Citation):

2.0 (A) 6. An initial compliance test for CO concentration was conducted on April 8 and 9, 2014.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

2.0 (A) 11. The Permittee shall minimize each engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the CO emission limitation in Condition 2(A). 10.i. of this permit applies. [40 C.F.R. § 63.6625(h)]

Compliance Methods for the Above (Description and Citation):

Records of engine run data are reviewed monthly.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

2.0 (B) 1. Periodic NOx Performance Testing. The permittee shall conduct performance testing every five calendar years, starting three years after the initial compliance test, to determine compliance with the emission limits in Condition 2.0 (A) 1.

Compliance Methods for the Above (Description and Citation):

2.0 (B) 6. The latest NOx performance testing was conducted on April 8 and 9, 2014.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

2.0 (B) 2. Annual Testing. The Permittee shall measure NOx emissions annually using a portable emissions analyzer to determine compliance with the emissions limits in Condition 2.0 (A)(1).

Compliance Methods for the Above (Description and Citation):

2.0 (B) 2. Annual NOx testing was conducted on November 16, 2015. The emissions tests demonstrated compliance with the NOx limit for each of the four engines. The engines were operated at their maximum load.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

2.0 (B) 3. The permittee shall continuously monitor the aftercooler water temperature for each engine. [Condition 4.1.g of PSD-PI-R50003-00-01]

Compliance Methods for the Above (Description and Citation):

2.0 (C) 4. The aftercooler return water temperature is continuously monitored for each engine. An alarm would notify the operator if the temperature exceeded the limit of 140 degrees F. Records are filed monthly of aftercooler return water temperature for each engine.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

2.0 (B) 4. The permittee shall continuously monitor the intake manifold pressure of each engine. [Condition 4.1.j of PSD-PI-R50003-00-01]

Compliance Methods for the Above (Description and Citation):

2.0 (C) 4. The intake manifold pressure is continuously monitored for each engine. An alarm would notify the operator if the pressure is outside the specified range. Records are filed monthly of intake manifold pressure for each engine.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

2.0 (B) 5. Upon request by the EPA, the permittee shall conduct performance tests for any or all of the following pollutants: sulfur dioxide, particulate matter, volatile organic compounds, carbon monoxide, and any combination of hazardous air pollutants.

Compliance Methods for the Above (Description and Citation):

2.0 (B) 5. The EPA has not requested any additional performance testing to be conducted.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

2.0 (B) 6. The Permittee shall conduct an initial CO compliance test according to condition 2.0(B).8 or condition 2.0(B).9 of this permit within 180 days of May 3, 2013 unless EPA grants an extension according to the provisions of 40 C.F.R. §63.6(f). [40 C.F.R. §63.6612(a)]

Compliance Methods for the Above (Description and Citation):

2.0 (B) 6. An initial compliance test for CO concentration was conducted on April 8 and 9, 2014. EPA granted NRG Reliability Solutions a one year extension to install control equipment to comply with 40 CFR 63 Subpart ZZZZ.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

2.0 (B) 7. The Permittee shall conduct a CO performance test every 8,760 hours or 3 years, whichever comes first. [40 C.F.R. § 63.6615, Table 3 to 40 C.F.R. Part 63, Subpart ZZZZ]

Compliance Methods for the Above (Description and Citation):

The initial CO performance test was conducted April 8 and 9, 2014.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

2.0 (B) 8. If the Permittee is complying with the CO reduction requirement in condition 2.0(A). 10.ii. of this permit then the Permittee shall measure the O₂ and CO at the inlet and the outlet of the control device using the methods specified in the permit. Measurements to determine O₂ must be made at the same time as the measurements for CO concentration. The CO concentration must be at 15 percent O₂, dry basis. [40 C.F.R. § 63.6612(a), 40 C.F.R. § 63.6620(a), Table 4 to 40 C.F.R. Part 63, Subpart ZZZZ]

Compliance Methods for the Above (Description and Citation):

NRG complied with the CO concentration requirement.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

2.0 (B) 9. Testing requirements for complying with the CO concentration requirement in condition 2.0(A).10.i.

Compliance Methods for the Above (Description and Citation):

2.0 (B) 6. An initial compliance test for CO concentration was conducted on April 8 and 9, 2014.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

2.0 (B) 10. The Permittee shall provide notice of intent to conduct a CO performance test under condition 2.0(B).8 or condition 2.0(B).9 of this permit at least 60 calendar days before the performance test is initially scheduled to begin to allow EPA, upon request, to review and approve the site-specific test plan required under condition 2.0(B). 11 and to have an observer present during the test. [40 C.F.R. §§ 63.6645, 63.7(b)]

Compliance Methods for the Above (Description and Citation):

NRG submitted a notice of intent to conduct the initial CO performance test on February 6, 2014. An initial compliance test for CO concentration was conducted on April 8 and 9, 2014.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

2.0 (B) 11. Before conducting a performance test required by condition 2.0(B).8 or condition 2.0(B).9 of this permit, the Permittee shall develop and, if requested by EPA, shall submit a site-specific test plan for approval at least 60 calendar days before the performance test is scheduled to take place, that is, simultaneously with the notification of intent to conduct a performance test required under condition 2.0(B). 10 of this permit. [40 C.F.R. §§ 63.6645, 63.7(b) and (c)]

Compliance Methods for the Above (Description and Citation):

NRG submitted a site specific test plan for conducting the initial CO performance test on February 6, 2014. An initial compliance test for CO concentration was conducted on April 8 and 9, 2014.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

2.0 (C) 1. Within 45 days of completion of a NO_x performance or annual test or within 60 days of completion of a CO performance test, the Permittee shall submit a written report to the EPA detailing the results of each test [Conditions 5 and 6 of PSD-PI-R50003-00-01, 40 C.F.R. 63.7(g)(1)]

Compliance Methods for the Above (Description and Citation):

2.0 (C) 1. The annual NO_x test results were submitted on December 28, 2015, which is less than 45 days following the tests.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

2.0 (C) 2. The permittee shall maintain records, including printouts of digital readouts, gauges, or meters, for times in which the flash file program #180-1736 is modified and any times in which retard engine timing parameters have been changed. [Condition 4.1.m of PSD-PI-R50003-00-01]

Compliance Methods for the Above (Description and Citation):

2.0 (C) 4. Reports of engine run data are downloaded monthly, reviewed for any problems, and stored electronically.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

2.0 (C) 3. The permittee shall certify that all electronic controls are set for low emission strategy. [Condition 4.1.o of PSD-PI-R50003-00-01]

Compliance Methods for the Above (Description and Citation):

2.0 (C) 3, 4. Reports of engine run data are downloaded monthly, reviewed for any problems, and stored electronically.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

2.0 (C) 4. The permittee shall maintain a file at the facility or at the main office the records that are required to be retained by this permit.

Compliance Methods for the Above (Description and Citation):

2.0 (C) 4. Records are kept either as paper files or stored electronically at the NRG Reliability Solutions main office. The generator building at Treasure Island is unmanned.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

2.0 (C) 5. For each engine the Permittee must submit a compliance report semiannually. The first compliance report must cover the period beginning May 3, 2013, and ending June 30, 2013. The first compliance report must be postmarked or delivered to EPA no later than July 31, 2013. Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. Each subsequent compliance report must be postmarked or delivered to EPA no later than July 31 or January 31, whichever date is the first following the end of the semiannual reporting period. [40 C.F.R. § 63.6650, Table 7 to 40 C.F.R. Part 63, Subpart ZZZZ]

Compliance Methods for the Above (Description and Citation):

The latest Semiannual Compliance Report was submitted by July 31, 2016.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

2.0 (C) 6. The Permittee shall maintain a copy of each semiannual compliance report, records of the occurrence and duration of each malfunction in monitoring equipment, records of performance tests, records of all required maintenance performed on the monitoring equipment, and records of actions taken during periods of malfunction to minimize emissions. [40 C.F.R. §§ 63.6655, 63.6660]

Compliance Methods for the Above (Description and Citation):

Records are maintained at the NRG Reliability Solutions office or electronically.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

3.0 (A) 1. The permittee shall keep records of required monitoring information that include the following: date, place, and time of sampling or measurements, date(s) analyses were performed, company or entity that performed the analyses, the analytical techniques or methods used, results, and operating conditions at the time of sampling or measurement.

Compliance Methods for the Above (Description and Citation):

2.0 (C) 4. Performance test and annual test reports are kept on file. Monitoring data is downloaded monthly and stored electronically.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

3.0 (A) 2. The permittee shall retain records of all required monitoring data and support information for a period of at least five calendar years from the date of the monitoring sample, measurement, report, or application.

Compliance Methods for the Above (Description and Citation):

3.0 (A) 2. Records are kept for at least five calendar years.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

3.0 (B) 1. The permittee shall submit to the EPA semi-annual reports of any required monitoring for each six-month reporting period from January 1 to June 30, and from July 1 to December 31.

Compliance Methods for the Above (Description and Citation):

3.0 (B) 1. The latest Six-Month Monitoring Reports was submitted in July 2016.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

3.0 (B) 2. The permittee shall promptly report to the EPA deviations from permit requirements, including those attributed to malfunction, emergency or other upset conditions, the probable cause of such deviations, and any corrective actions or preventive measure taken.

Compliance Methods for the Above (Description and Citation):

3.0 (B) 1, 2. Deviations were reported in the Six-Month Monitoring Reports and Semiannual Compliance Reports.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

3.0 (B) 2. (ii)(a). For emissions of a hazardous air pollutant or a toxic air pollutant that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.

Compliance Methods for the Above (Description and Citation):

3.0 (B) 1, 2. No excess emissions of hazardous or toxic air pollutants have occurred.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

3.0 (B) 2.(ii)(b). For emissions of any regulated pollutant excluding a hazardous air pollutant or a toxic air pollutant that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.

Compliance Methods for the Above (Description and Citation):

3.0 (B) 1, 2. No excess emissions of regulated air pollutants have occurred.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

3.0 (B) 2.(ii)(c). For all other deviations from permit requirements, the report shall be submitted with the semi-annual monitoring report.

Compliance Methods for the Above (Description and Citation):

3.0 (B) 1, 2. Deviations of intake manifold pressure were reported in the Six-Month Monitoring Reports.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

3.0 (B) 3. If any of the conditions in 3.0 (B) (2) (ii) (a) through (c) above are met, the source must notify the EPA by telephone or facsimile based on the timetable listed. A written notice must be submitted within 10 working days of the occurrence. All deviations reported under this section must also be identified in the semi-annual report.

Compliance Methods for the Above (Description and Citation):

3.0 (B) 1, 2. Deviations were reported in the Six-Month Monitoring Reports.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

3.0 (B) 4. Any application form, report, or compliance certification required to be submitted by this permit shall contain certification by a responsible official of truth, accuracy, and completeness. All certifications shall state that, based on reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Compliance Methods for the Above (Description and Citation):

3.0 (B) 4; 4.0 (H) 1. All submissions were certified by the responsible official.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

3.0 (D). Performance Testing.

Compliance Methods for the Above (Description and Citation):

4.0 (R); 2.0 (B) 2. Annual testing of NOx emissions was conducted November 16, 2015 to determine compliance.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

4.0 (B). Annual Fee Payment. Submission of annual report of actual emissions, fee calculation worksheet and annual fee payment.

Compliance Methods for the Above (Description and Citation):

4.0 (B). The annual fee payment was submitted in June 2016.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

4.0 (C). Compliance Statement. The permittee must comply with all conditions of the Part 71 permit.

Compliance Methods for the Above (Description and Citation):

4.0 (D). The facility is in compliance with its permit. Minor deviations were reported in the semiannual reports.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

4.0 (D). Compliance Certification

Compliance Methods for the Above (Description and Citation):

4.0 (D). The compliance certification for 2015 was submitted in January 2016.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

4.0 (E). Schedule of Compliance. For applicable requirements with which the source is in compliance, the source will continue to comply with such requirements. For applicable requirements that will become effective during the permit term, the source shall meet such requirements on a timely basis.

Compliance Methods for the Above (Description and Citation):

4.0 (D). The facility will continue to comply with applicable requirements.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):

4.0 (F). Duty to Provide and Supplement Information.

Compliance Methods for the Above (Description and Citation):

4.0 (F). NRG Reliability Solutions requested a minor modification in 2013. The modified permit was issued March 6, 2014.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):
4.0 (H). Submissions.

Compliance Methods for the Above (Description and Citation):
4.0 (H). All documents required to be submitted by the permit were certified by a responsible official as to truth, accuracy, and completeness.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):
4.0 (P). Inspection and Entry.

Compliance Methods for the Above (Description and Citation):
4.0 (P). EPA has not performed an inspection of the facility.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):
4.0 (Q). Emergency Provisions.

Compliance Methods for the Above (Description and Citation):
4.0 (Q). No emergencies occurred at the facility during 2015-2016.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):
4.0 (R). Off-Permit Changes.

Compliance Methods for the Above (Description and Citation):
4.0 (R). There were no off-permit changes in 2016.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):
4.0 (T). Emissions Trading.

Compliance Methods for the Above (Description and Citation):
4.0 (T). No emissions trading has occurred at this facility.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):
4.0 (U). Acid Rain Permit Provisions.

Compliance Methods for the Above (Description and Citation):
4.0 (U). The engines are exempt from Acid Rain regulations.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): EU-01, EU-02, EU-03, EU-04

Applicable Requirement (Description and Citation):
4.0 (V). Operational Flexibility.

Compliance Methods for the Above (Description and Citation):
4.0 (V). No operational changes have been made at the facility in 2016.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

B. SCHEDULE OF COMPLIANCE

Complete this section if you answered "NO" to any of the questions in section A. Also, complete this section if required to submit a schedule of compliance by an applicable requirement. Please attach copies of any judicial consent decrees or administrative orders for this requirement.

Unit(s) _____ Requirement _____

Reason for Noncompliance. Briefly explain reason for noncompliance at time of permit issuance or that future-effective requirement will not be met on a timely basis:

Narrative Description of how Source Compliance Will be Achieved. Briefly explain your plan for achieving compliance:

Schedule of Compliance. Provide a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance, including a date for final compliance.

Remedial Measure or Action	Date to be Achieved

C. SCHEDULE FOR SUBMISSION OF PROGRESS REPORTS

Only complete this section if you are required to submit one or more schedules of compliance in section B or if an applicable requirement requires submittal of a progress report. If a schedule of compliance is required, your progress report should start within 6 months of application submittal and subsequently, no less than every six months. One progress report may include information on multiple schedules of compliance.

Contents of Progress Report (describe): First Report ___ / ___ / ___ Frequency of Submittal _____
Contents of Progress Report (describe): First Report ___ / ___ / ___ Frequency of Submittal _____

D. SCHEDULE FOR SUBMISSION OF COMPLIANCE CERTIFICATIONS

This section must be completed once by every source. Indicate when you would prefer to submit compliance certifications during the term of your permit (at least once per year).

Frequency of submittal Annual Beginning 01 / 31 / 2017

E. COMPLIANCE WITH ENHANCED MONITORING & COMPLIANCE CERTIFICATION REQUIREMENTS

This section must be completed once by every source. To certify compliance with these, you must be able to certify compliance for every applicable requirement related to monitoring and compliance certification at every unit.

Enhanced Monitoring Requirements: N/A In Compliance Not In Compliance

Compliance Certification Requirements: X In Compliance Not In Compliance



NRG Reliability Solutions LLC

APPENDIX A: MONTHLY RUN HOURS

NRG Reliability Solutions - Treasure Island
 Monthly Run Hours

Date	Generator 1			Generator 2			Generator 3			Generator 4		
	Run Time		12-mo sum									
	minutes	hours	hrs/yr									
Jan-13	30	1	-	30	1	-	30	1	-	15	0	-
Feb-13	30	1	-	30	1	-	30	1	-	15	0	-
Mar-13	31	1	-	31	1	-	26	0	-	28	0	-
Apr-13	85	1	-	62	1	-	61	1	-	30	1	-
May-13	1268	21	-	1268	21	-	248	4	-	83	1	-
Jun-13	607	10	-	607	10	-	607	10	-	577	10	-
Jul-13	1648	27	-	1647	27	-	1646	27	-	1496	25	-
Aug-13	1337	22	-	1337	22	-	1336	22	-	1321	22	-
Sep-13	0	-	-	0	-	-	0	-	-	0	-	-
Oct-13	0	-	-	0	-	-	0	-	-	0	-	-
Nov-13	55	1	-	65	1	-	70	1	-	75	1	-
Dec-13	25	0	85	25	0	85	25	0	68	10	0	61
Jan-14	0	-	85	0	-	85	0	-	67	0	-	61
Feb-14	50	1	85	50	1	85	50	1	68	20	0	61
Mar-14	20	0	85	20	0	85	20	0	68	10	0	60
Apr-14	315	5	89	315	5	89	310	5	72	235	4	64
May-14	25	0	68	25	0	68	25	0	68	10	0	63
Jun-14	30	1	58	0	-	56	26	0	58	0	-	53
Jul-14	790	13	44	790	13	44	790	13	44	790	13	41
Aug-14	275	5	26	275	5	26	275	5	27	275	5	24
Sep-14	195	3	30	195	3	29	195	3	30	195	3	27
Oct-14	45	1	30	45	1	30	45	1	31	25	0	27
Nov-14	50	1	30	50	1	30	50	1	30	25	0	27
Dec-14	25	0	30	25	0	30	25	0	30	10	0	27
Jan-15	25	0	31	25	0	30	25	0	31	10	0	27
Feb-15	25	0	30	25	0	30	25	0	30	10	0	27
Mar-15	60	1	31	60	1	31	60	1	31	20	0	27
Apr-15	125	2	28	125	2	27	125	2	28	110	2	25
May-15	25	0	28	25	0	27	25	0	28	10	0	25
Jun-15	25	0	28	25	0	28	25	0	28	25	0	25
Jul-15	980	16	31	980	16	31	980	16	31	965	16	28
Aug-15	25	0	27	25	0	27	25	0	27	20	0	24
Sep-15	25	0	24	25	0	24	25	0	24	25	0	21
Oct-15	25	0	24	25	0	24	25	0	24	10	0	21
Nov-15	95	2	24	100	2	24	105	2	25	75	1	22
Dec-15	25	0	24	25	0	24	25	0	25	10	0	22
Jan-16	25	0	24	25	0	24	25	0	25	10	0	22
Feb-16	25	0	24	25	0	24	25	0	25	10	0	22
Mar-16	25	0	24	25	0	24	25	0	24	10	0	21
Apr-16	25	0	22	25	0	22	25	0	22	10	0	20
May-16	25	0	22	25	0	22	25	0	22	10	0.17	20
Jun-16	25	0	22	25	0	22	25	0.42	22	0	-	19