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DYNEGY

March 13, 2012

Director of Compliance and Enforcement
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

Attention: Title V Reports

Subject: Oakland Power Plant Semiannual Monitoring Compliance Report

Dear Sir or Madam:

Pursuant to Condition I.F. of Major Facility Review Permit Number B1887, I am enclosing the semiannual monitoring compliance report for Oakland Power Plant for the period September 1, 2011 to February 29, 2012.

Please call Steve Abbott at (831) 633-6649 if you have any questions regarding this report.

Based on information and belief formed after reasonable inquiry, I certify that the enclosed monitoring report is true, accurate, and complete.

Sincerely,

GREGORY J. HUGHES
Plant Manager
Moss Landing and Oakland Power Plants

SFAbbott/lr

Enclosure

Major Facility Review Permit - Semiannual Monitoring Compliance Report
Oakland Power Plant - Facility #B1887
September 1, 2011 to February 29, 2012

As required by Permit Condition I.F, the following table summarizes the compliance with the monitoring requirements of Tables VII – A, VII - B and VII - C.

Type of Limit*	Emission Limit Citation*	Emission Limit*	Monitoring Requirement Citation*	Monitoring Frequency (P/C/N)*	Monitoring Type*	Compliance Summary
NO_X	BAAQMD 9-9-302	65 ppmv, dry @ 15% O_2	BAAQMD condition #2571, part 12b	P/D	water-to-fuel monitoring	The water-to-fuel ratio is checked daily when operating and adjusted, if necessary, to meet the ≥ 60% and ≤ 90% limit of permit condition #2571, part 8.
	BAAQMD 9-9-302	65 ppmv, dry @ 15% O_2	BAAQMD condition #2571, part 10	P/every 2000 hours of operation	source test	No source tests were required during this period. See note 1.
	BAAQMD condition #2571, part 3a	75 ppmv, dry @ 15% O_2, 3-hr average	BAAQMD condition #2571, part 12b	C	water-to-fuel monitoring	The water-to-fuel ratio is checked daily when operating and adjusted, if necessary, to meet the ≥ 60% and ≤ 90% limit of permit condition #2571, part 8.
	BAAQMD condition #2571, part 3a	75 ppmv, dry @ 15% O_2, 3-hr average	BAAQMD condition #2571, part 10	P/every 2000 hours of operation	source test	No source tests were required during this period. See note 1.
	BAAQMD condition #2571, part 3b	65 ppmv, dry @ 15% O_2, 3-hr average, except for startup and shutdown	BAAQMD condition #2571, part 12b	P/H	water-to-fuel monitoring	The water-to-fuel ratio is checked daily when operating and adjusted, if necessary, to meet the ≥ 60% and ≤ 90% limit of permit condition #2571, part 8.
	BAAQMD condition #2571, part 3b	65 ppmv, dry @ 15% O_2, 3-hr average, except for startup and shutdown	BAAQMD condition #2571, part 10	P/every 2000 hours of operation	source test	No source tests were required during this period. See note 1.

* As stated in Tables VII – A, VII - B and VII - C of the permit.

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Type of Limit*	Emission Limit Citation*	Emission Limit*	Monitoring Requirement Citation*	Monitoring Frequency (P/C/N)*	Monitoring Type*	Compliance Summary
SO_2	BAAQMD 9-1-301	GLC 0.5 ppm (3 min average) 0.25 ppm (60 min average) 0.05 ppm (24 hr average)		N		n/a
	BAAQMD 9-1-304	Sulfur content of fuel < 0.5% by weight	BAAQMD condition #2571, part 9	P/E	fuel analysis or certification	Each shipment of fuel received had sulfur content less than 0.05% by weight.
	BAAQMD condition #2571, part 2	Sulfur content of fuel < 0.3% by weight	BAAQMD condition #2571, part 9	P/E	fuel analysis or certification	Each shipment of fuel received had sulfur content less than 0.05% by weight. [The "Emission Limit" citation should be #2571, part 4.]
Opacity	BAAQMD 6-301	Ringelmann No. 1 for no more than 3 min/hr	BAAQMD condition #2571, part 11	P/every 400 hours of operation	visible emissions check	The operator checks for visible emission at each turbine start up. Startups occurred more frequently than every 400 hours.
FP	BAAQMD 6-310	0.15 grain/dscf		N		n/a
NMOC	BAAQMD condition #2571, part 3	< 40 lb/hr for all turbines combined	BAAQMD condition #2571, part 10	P/every 2000 hours of operation	source test	No source tests were required during this period. See note 1. [The "Emission Limit" citation should be #2571, part 5.]
Lead	BAAQMD 11-1-301	15 lb/day		N		n/a
	BAAQMD 11-1-302	GLC not to exceed 1.0 ug/cm.m., 24 hr. avg.		N		n/a

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Type of Limit*	Emission Limit Citation*	Emission Limit*	Monitoring Requirement Citation*	Monitoring Frequency (P/C/N)*	Monitoring Type*	Compliance Summary
Hours of operation	BAAQMD 9-9-302	< 877 hr/per 12-month period for each turbine	BAAQMD 9-9-302	P/E	records	Each turbine operated less than 877 hours per 12-month period as shown in Table II, Note 2.
	BAAQMD condition #2571, part 4	< 5000 hr/yr for all turbines combined	BAAQMD condition #2571, part 12	P/E	records	The total operating hours for the year 2011 were 304.7 hours. The total operating hours for the year 2012 as of 2/29/12 were 98.7. [The "Emission Limit" citation should be #2571, part 6.]
VOC	BAAQMD condition #5974, part 1	< 20 gal/yr	BAAQMD condition #5974, part 2	P/D	records	No solvent wipe cleaning occurred during this report period.
Opacity	BAAQMD 6-303	Ringelmann No. 2 for no more than 3 min/hr		N		n/a
SO_2	BAAQMD 9-1-304	Sulfur content of fuel < 0.5% by weight	BAAQMD condition #22183, part 4	P/M	fuel analysis or certification	Each shipment of fuel received had sulfur content less than 0.05% by weight.
Hours of Operation	BAAQMD 9-8-330	100 hours in a calendar year	BAAQMD 9-8-530	P/E	records	The emergency standby diesel engine operated 13.0 hours for reliability-related activities in 2011

* As stated in Tables VII – A, VII - B and VII - C of the permit.

Notes:

1. **Table I below shows compliance with the source test requirements.**

TABLE I
Source Test Compliance Information

Turbine Engine	Date of Currently Applicable Source Test	Hours of operation since currently applicable source test.	Hours of operation since current source test less than 2000 hours (yes/no)
1A	6/20/07	381.9	Yes – complies
1B	6/20/07	372.6	Yes – complies
2A	6/22/07	530.3	Yes – complies
2B	6/22/07	507.8	Yes – complies
3A	6/21/07	291.2	Yes – complies
3B	6/21/07	277.2	Yes – complies

2. **Table II below shows compliance with 877 hours operating hours per 12-month period limit.**

TABLE II
Operating Hours Rolling 12-Month Compliance Information

	Turbine Engine 1A Rolling 12-Month Operating Hours	Turbine Engine 1B Rolling 12-Month Operating Hours	Turbine Engine 2A Rolling 12-Month Operating Hours	Turbine Engine 2B Rolling 12-Month Operating Hours	Turbine Engine 3A Rolling 12-Month Operating Hours	Turbine Engine 3B Rolling 12-Month Operating Hours
March 2011	87.1	71.3	138.9	85.6	65.4	75.1
April 2011	81.8	65.5	134.3	80.7	65.3	72.9
May 2011	80.5	63.8	132.7	83.1	63.7	72.0
June 2011	79.3	62.5	133.9	79.4	58.2	66.5
July 2011	80.6	63.8	118.4	65.0	58.2	66.5
August 2011	78.6	61.8	116.3	64.4	58.2	66.5
September 2011	143.9	115.4	122.0	80.2	85.6	83.9
October 2011	97.9	78.2	59.3	49.6	81.2	83.0
November 2011	99.8	73.8	66.6	46.3	70.9	62.1
December 2011	87.0	58.7	53.9	35.6	37.7	31.8
January 2012	87.0	58.7	52.2	34.5	37.7	31.8
February 2012	125.9	84.7	75.0	41.9	38.2	30.3

* As stated in Tables VII – A, VII - B and VII - C of the permit.