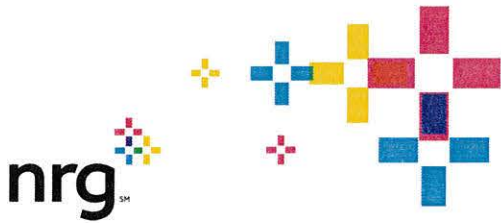


## DOCKETED

|                         |   |
|-------------------------|---|
| <b>Docket Number:</b>   | 00-AFC-14C  |
| <b>Project Title:</b>   | El Segundo Power Redevelopment Project Compliance                         |
| <b>TN #:</b>            | 207240-3  |
| <b>Document Title:</b>  | ESEC Attachment 2: Notice to South Coast AQMD of Unit 4 Boiler Retirement |
| <b>Description:</b>     | N/A   |
| <b>Filer:</b>           | Camile Remy-Obad  |
| <b>Organization:</b>    | NRG/Ken Riesz, Sr.  |
| <b>Submitter Role:</b>  | Applicant   |
| <b>Submission Date:</b> | 1/8/2016 3:13:59 PM   |
| <b>Docketed Date:</b>   | 1/8/2016  |



**El Segundo Power, LLC.**  
301 Vista Del Mar Boulevard  
El Segundo, CA 90245  
Phone: 310.615.6028  
Fax: 310.615.6060

December 19, 2015

Mohsen Nazemi  
Deputy Executive Officer  
Engineering & Compliance  
South Coast AQMD  
21865 E. Copley Drive  
Diamond Bar, CA 91765-4182

**Subject: El Segundo Power, LLC – Unit 4 Retirement from EPA’s Acid Rain Program  
EPA’s Oris Code # 00330**

Dear Mr. Nazemi:

The following is submitted by NRG El Segundo Operations Inc. on behalf of El Segundo Power, LLC, EPA’s Oris Code # 00330. The purpose of this correspondence is to submit to the District “EPA’s Retired Unit Exemption” for Unit 4 as per 40 CFR part 72.8, this removes the unit from the Acid Rain Program as this unit will be officially retired on 12-31-2015. This submittal has been electronically sent to the Washington DC’s EPA office.

If you have any questions or need any additional information, please do not hesitate to contact me at 310-615-6030 or George Piantka at 760-710-2156.

Sincerely,  
El Segundo Power, LLC  
By: NRG El Segundo Operations Inc.  
Its Authorized Agent

By:   
Ken H. Riesz Sr.  
Plant Manager

cc: George Piantka, NRG Energy  
John Yee, SCAQMD  
Steven Odabashian, El Segundo Power, LLC  
Rafael Reynosa, SCAQMD



# Retired Unit Exemption

For more information, see instructions and refer to 40 CFR 72.8, 96.105, 96.205, 96.305, 97.405, 97.505, 97.605, and 97.705, or a comparable state regulation, as applicable.

This submission is:  New  Revised

**STEP 1**

Identify the unit by plant (source) name, State, ORIS/plant code and unit ID#.

|                     |       |                 |          |
|---------------------|-------|-----------------|----------|
| El Segundo          | CA    | 00330           | 4        |
| Plant (Source) Name | State | ORIS/Plant Code | Unit ID# |

**STEP 2**

Indicate the program(s) that the unit is subject to

- Acid Rain  Transport Rule NO<sub>x</sub> Annual  
 CAIR NO<sub>x</sub> Annual  Transport Rule NO<sub>x</sub> Ozone Season  
 CAIR SO<sub>2</sub>  Transport Rule SO<sub>2</sub> Annual  
 CAIR NO<sub>x</sub> Ozone Season

**STEP 3**

Identify the date on which the unit was (or will be) permanently retired.

12-31-15

**STEP 4**

If the unit is subject to the Acid Rain Program, identify the first full calendar year in which the unit meets (or will meet) the requirements of 40 CFR 72.8(d).

January 1, 2016

**STEP 5**

Read the appropriate special provisions.

**Acid Rain Program Special Provisions**

- (1) A unit exempt under 40 CFR 72.8 shall not emit any sulfur dioxide and nitrogen oxides starting on the date that the exemption takes effect. The owners and operators of the unit will be allocated allowances in accordance with 40 CFR part 73 subpart B.
- (2) A unit exempt under 40 CFR 72.8 shall not resume operation unless the designated representative of the source that includes the unit submits a complete Acid Rain permit application under 40 CFR 72.31 for the unit not less than 24 months prior to the date on which the unit is first to resume operation.
- (3) The owners and operators and, to the extent applicable, the designated representative of a unit exempt under 40 CFR 72.8 shall comply with the requirements of the Acid Rain Program concerning all periods for which the exemption is not in effect, even if such requirements arise, or must be complied with, after the exemption takes effect.
- (4) For any period for which a unit is exempt under 40 CFR 72.8, the unit is not an affected unit under the Acid Rain Program and 40 CFR part 70 and 71 and is not eligible to be an opt-in source under 40 CFR part 74. As an unaffected unit, the unit shall continue to be subject to any other applicable requirements under 40 CFR parts 70 and 71.
- (5) For a period of 5 years from the date the records are created, the owners and operators of a unit exempt under 40 CFR 72.8 shall retain, at the source that includes the unit, records demonstrating that the unit is permanently retired. The 5-year period for keeping records may be extended for cause, at any time prior to the end of the period, in writing by the Administrator or the permitting authority. The owners and operators bear the burden of proof that the unit is permanently retired.
- (6) On the earlier of the following dates, a unit exempt under 40 CFR 72.8(b) or (c) shall lose its exemption and become an affected unit under the Acid Rain Program and 40 CFR part 70 and 71: (i) the date on which the designated representative submits an Acid Rain permit application under paragraph (2); or (ii) the date on which the designated representative is required under paragraph (2) to submit an Acid Rain permit application. For the purpose of applying monitoring requirements under 40 CFR part 75, a unit that loses its exemption under 40 CFR 72.8 shall be treated as a new unit that commenced commercial operation on the first date on which the unit resumes operation.

**STEP 6**


Read the statement of compliance and the appropriate certification statements and sign and date.

**Statement of Compliance**

I certify that the unit identified above at STEP 1 was (or will be) permanently retired on the date identified at STEP 3 and will comply with the appropriate Special Provisions listed at STEP 5.

**Certification (for Acid Rain, CAIR, or Transport Rule designated representatives or alternate Acid Rain, CAIR, or Transport Rule designated representatives only)**

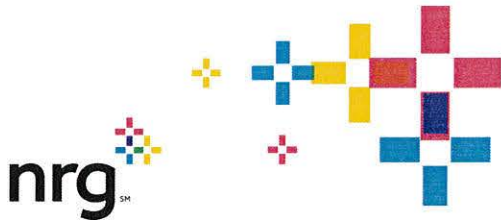
I am authorized to make this submission on behalf of the owners and operators of the source and unit for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

|                    |   |       |                   |
|--------------------|---|-------|-------------------|
| Name               | Ken H. Riesz Sr.  | Title | Plant Manager     |
| Owner Company Name | El Segundo Power, LLC   |       |                   |
| Phone              | 310-615-6030  | Email | ken.riesz@nrg.com |
| Signature          |  |       | Date<br>12/10/15  |

**Certification (for certifying officials of units subject to the Acid Rain Program only)**

I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

|                    |       |  |      |
|--------------------|-------|--|------|
| Name               | Title |  |      |
| Owner Company Name |       |  |      |
| Phone              | Email |  |      |
| Signature          |       |  | Date |



**El Segundo Power, LLC**  
 301 Vista Del Mar Boulevard  
 El Segundo, CA 90245  
 Phone: 310.615.6028  
 Fax: 310.615.6060

December 19, 2015

Mohsen Nazemi  
 Deputy Executive Officer  
 Engineering & Compliance  
 South Coast AQMD  
 21865 E. Copley Drive  
 Diamond Bar, CA 91765-4182

**Subject: El Segundo Power, LLC - Unit 4 Retirement, SCAQMD ID No. D13  
 Facility ID 115663**

Dear Mr. Nazemi:

The following is submitted by NRG El Segundo Operations Inc. on behalf of El Segundo Power LLC, SCAQMD Facility I.D. #115663. This correspondence is to notify the District of the retirement of Unit 4 SCAQMD Equipment I.D. #D13, on December 31, 2015. This unit will no longer operate in order to comply with the California Regional Water Control Board Order R4-2015-0029, NPDES No. CA001147, Once Through Cooling (OTC) Compliance Schedule in section VI (C)(6) b of the NPDES permit. With this communication, El Segundo Power is confirming that Unit 4 will retire by 11:59 PM on December 31, 2015. The following is the proposed schedule of activities for the retirement Unit 4.

| Table 1<br>Retirement Plan for Unit 4   |                  |                       |
|---|------------------|-----------------------|
| Action  | Schedule         | Responsible Party     |
| Surrender SCAQMD Permit to Operate for Unit 4, SCAQMD I.D. D13  | January 31, 2016 | El Segundo Power, LLC |
| Close the Natural Gas supply line for Unit 4 and remove electrical Connection to the motor operated Valve (MOV); the boiler cannot operate without fuel | January 31, 2016 | El Segundo Power, LLC |
| Remove the Boilers V - cones metering system and fuel control system.   | January 31, 2016 | El Segundo Power, LLC |

Mr. Mohsen Nazemi, SCAQMD

December 19, 2015

Page 2

It should be noted that South Coast Air Quality Management District (SCAQMD) issued a Final Determination of Compliance (FDOC) for the El Segundo Power Facility Modification (ESPFM) Project (i.e., replacement of El Segundo Power Units 3 and 4) on June 23, 2015. The FDOC included condition F52.1 that outlined the requirements for a Unit 4 retirement plan and a corresponding due date of December 31, 2015. However, the ESPFM Project is still before the California Energy Commission as a Petition to Amend, docketed under 00-AFC-14C. The conditions in this FDOC are not actionable unless the CEC approves the Petition to Amend and SCAQMD issues its Permit to Construct/Temporary Permit to Operate (PTC/TPTO). Nonetheless, El Segundo Power is informing SCAQMD of these planned Unit 4 retirement activities that would be undertaken after December 31, 2015. If CEC approves the ESPFM Project and SCAQMD issues the PTC/TPTO, El Segundo Power will follow up with SCAQMD with respect to condition F52.1 as presented in the June 23, 2015 FDOC.

If you have any questions or need any additional information, please do not hesitate to contact me at 310-615-6030 or George Piantka at 760-710-2156.

Sincerely,  
El Segundo Power, LLC  
By: NRG El Segundo Operations Inc.  
Its Authorized Agent

By:   
Ken H. Riesz Sr.  
Plant Manager

cc: George Piantka, NRG Energy  
John Yee, SCAQMD  
Rafael Reynosa, SCAQMD  
Steven Odabashian, El Segundo Power, LLC



**Shipment Receipt**

*ES - Retirement U #4 letters  
 SCAQMD ID # D13 Facility ID # 115663 &  
 EPA's Acid Rain Prog - EPA's Orlis Code 0330*

**Transaction Date:** 18 Dec 2015

**Tracking Number:** 1Z10Y65E3099355104

|   |   |  |
|---|---|--|
| <b>1 Address Information</b>  |   |  |
| <b>Ship To:</b><br>SCAQMD<br>Mohsen Nazemi<br>Deputy Executive Officer<br>Engineering and Compliance<br>21865 E. Copley Drive<br>DIAMOND BAR CA 917654178 | <b>Ship From:</b><br>NRG - El Segundo<br>Environmental Department<br>301 Vista Del Mar<br>El Segundo CA 90245<br>Telephone:310-615-6387 | <b>Return Address:</b><br>NRG - El Segundo<br>Environmental Department<br>301 Vista Del Mar<br>El Segundo CA 90245<br>Telephone:310-615-6387 |

| <b>2 Package Information</b>   |                        |                |                   |
|--------------------------------|------------------------|----------------|-------------------|
| Weight                         | Dimensions / Packaging | Declared Value | Reference Numbers |
| 1. Letter<br>(Letter billable) | UPS Letter             |                |                   |

|   |   |  |                  |
|---|---|--|------------------|
| <b>3 UPS Shipping Service and Shipping Options</b>  |   |  |                  |
| <b>Service:</b> UPS Next Day Air Saver<br><b>Delivery Date:</b> 3:00 PM Monday, Dec 21, 2015<br><b>Shipping Fees Subtotal:</b> 20.74 USD  | <b>Additional Shipping Options</b>  |  |                  |
| Transportation: 19.85 USD<br>Fuel Surcharge: 0.89 USD   | <b>Delivery Confirmation:</b><br>Package1: Delivery Confirmation 2.00 USD |  | No Charge        |
| <b>Quantum View Notify E-mail Notifications:</b><br>1 srie.coustar@nrgenergy.com: Delivery<br>2 George.Piantka@nrg.com: Delivery<br>3 steven.odabashian@nrg.com: Delivery<br>4 tim.sisk@nrg.com: Delivery<br>5 steven.petenbrink@nrg.com: Delivery<br>E-mail Failure Notification: srie.coustar@nrgenergy.com |   |  |                  |
| <b>Total Shipping Charges</b>   |   |  | <b>22.74 USD</b> |

|   |           |
|---|-----------|
| <b>4 Payment Information</b>                              |           |
| <b>Bill Shipping Charges to:</b> Shipper's Account 10Y65E |           |
| <b>Charges:</b>   | 22.74 USD |
| <b>Daily rates were applied to this shipment</b>          |           |
| <b>Total Charged:</b>                                     | 22.74 USD |

Note: Your invoice may vary from the displayed reference rates.

\* For delivery and guarantee information, see the UPS Service Guide. To speak to a customer service representative, call 1-800-PICK-UPS for domestic services and 1-800-782-7892 for international services.



Shipment Receipt

ES - Retirement U# 4 Letters  
SCAQMD ID # D13, Facility ID # 115663 and  
EPA'S Acid Rain Prog. EPA'S ORIS Code # 03370

Transaction Date: 18 Dec 2015

Tracking Number:

1Z10Y65E3097055898

1 Address Information

Ship To:  
SCAQMD  
Refinery, Energy & RECLAIM Admin.  
Rafael Reynosa, Enforcement Superv.  
21865 E. Copley Drive  
DIAMOND BAR CA 917654178

Ship From:  
NRG - El Segundo  
Environmental Department  
301 Vista Del Mar  
El Segundo CA 90245  
Telephone: 310-615-6387

Return Address:  
NRG - El Segundo  
Environmental Department  
301 Vista Del Mar  
El Segundo CA 90245  
Telephone: 310-615-6387

2 Package Information

| Weight                         | Dimensions / Packaging | Declared Value | Reference Numbers |
|--------------------------------|------------------------|----------------|-------------------|
| 1. Letter<br>(Letter billable) | UPS Letter             |                |                   |

3 UPS Shipping Service and Shipping Options

|                         |                              |   |                  |
|-------------------------|------------------------------|---|------------------|
| Service:                | UPS Next Day Air Saver       |   |                  |
| Delivery Date:          | 3:00 PM Monday, Dec 21, 2015 |   |                  |
| Shipping Fees Subtotal: | 20.74 USD                    | <b>Additional Shipping Options</b>                      |                  |
| Transportation          | 19.85 USD                    | Delivery Confirmation:                                  |                  |
| Fuel Surcharge          | 0.89 USD                     | Package 1: Delivery Confirmation                        | 2.00 USD         |
|                         |                              | Quantum View Notify E-mail Notifications:               | No Charge        |
|                         |                              | 1 srie.coustar@nrgenergy.com: Delivery                  |                  |
|                         |                              | 2 George.Piantka@nrg.com: Delivery                      |                  |
|                         |                              | 3 steven.odabashian@nrg.com: Delivery                   |                  |
|                         |                              | 4 tim.sisk@nrg.com: Delivery                            |                  |
|                         |                              | 5 steven.petenbrink@nrg.com: Delivery                   |                  |
|                         |                              | E-mail Failure Notification: srie.coustar@nrgenergy.com |                  |
|                         |                              | <b>Total Shipping Charges</b>                           | <b>22.74 USD</b> |

4 Payment Information

|  |                          |
|--|--------------------------|
| Bill Shipping Charges to:                        | Shipper's Account 10Y65E |
| Charges:   | 22.74 USD                |
| <b>Daily rates were applied to this shipment</b> |                          |
| Total Charged:                                   | 22.74 USD                |

Note: Your invoice may vary from the displayed reference rates.

\* For delivery and guarantee information, see the UPS Service Guide. To speak to a customer service representative, call 1-800-PICK-UPS for domestic services and 1-800-782-7892 for international services.





**Shipment Receipt**

*ES- Retirement U#4 Letters  
 SCAQMD ID# #3, Facility ID #115663 and  
 EPA's Acid Rain Prog. EPA's DRIS Code # 0330*

**Transaction Date:** 18 Dec 2015

**Tracking Number:**

1Z10Y65E3096298888

|  |   |  |
|--|---|--|
| <b>1 Address Information</b>   |   |  |
| <b>Ship To:</b><br>SCAQMD<br>John Yee<br>21865 E. Copley Drive<br>Engineering and Compliance<br>DIAMOND BAR CA 917654178<br>Telephone:909 396 2000 | <b>Ship From:</b><br>NRG - El Segundo<br>Environmental Department<br>301 Vista Del Mar<br>El Segundo CA 90245<br>Telephone:310-615-6387 | <b>Return Address:</b><br>NRG - El Segundo<br>Environmental Department<br>301 Vista Del Mar<br>El Segundo CA 90245<br>Telephone:310-615-6387 |

| <b>2 Package Information</b>   |                        |                |                   |
|--------------------------------|------------------------|----------------|-------------------|
| Weight                         | Dimensions / Packaging | Declared Value | Reference Numbers |
| 1. Letter<br>(Letter billable) | UPS Letter             |                |                   |

|  |   |  |                  |
|--|---|--|------------------|
| <b>3 UPS Shipping Service and Shipping Options</b>   |   |  |                  |
| <b>Service:</b><br>UPS Next Day Air Saver<br><b>Delivery Date:</b><br>3:00 PM Monday, Dec 21, 2015 | <b>Shipping Fees Subtotal:</b> 20.74 USD  |  |                  |
| Transportation: 19.85 USD<br>Fuel Surcharge: 0.89 USD  | <b>Additional Shipping Options</b><br><b>Delivery Confirmation:</b><br>Package1: Delivery Confirmation 2.00 USD<br><b>Quantum View Notify E-mail Notifications:</b><br>No Charge<br>1 srie.coustar@nrgenergy.com: Delivery<br>2 George.Piantka@nrg.com: Delivery<br>3 steven.odabashian@nrg.com: Delivery<br>4 tim.sisk@nrg.com: Delivery<br>5 steven.petenbrink@nrg.com: Delivery<br>E-mail Failure Notification: srie.coustar@nrgenergy.com |  |                  |
| <b>Total Shipping Charges</b>  |   |  | <b>22.74 USD</b> |

|  |                          |
|--|--------------------------|
| <b>4 Payment Information</b>                     |                          |
| <b>Bill Shipping Charges to:</b>                 | Shipper's Account 10Y65E |
| <b>Charges:</b>                                  | 22.74 USD                |
| <b>Daily rates were applied to this shipment</b> |                          |
| <b>Total Charged:</b>                            | 22.74 USD                |

Note: Your invoice may vary from the displayed reference rates.

\* For delivery and guarantee information, see the UPS Service Guide. To speak to a customer service representative, call 1-800-PICK-UPS for domestic services and 1-800-782-7892 for international services.