Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §145.6] (Standard requirements.)	Monitoring Requirements, #012	1) The owners and operators and the NOx authorized account representative of each NOx budget source and each NOx budget unit at the source shall comply with the monitoring requirements of §§ 145.70 - 145.76 (relating to recordkeeping and recording...	CEMs/DAHS in place, PADEP's Continuous Source Monitoring Manual, CEMS QA/QC program.	☐Intermittent
033 - NO. 3 BOILER [25 Pa. Code §145.74.] (Recordkeeping and reporting.)	Section D - III. Monitoring Requirements, #013	§ 145.74(b) Standard requirements - Monitoring plans. 1) The owner or operator of a unit subject to an acid rain emissions limitation shall comply with requirements of 40 CFR 75.62 (relating to monitoring plan), except that the monitoring plan shall also include all of the information required by ...	Monitoring plan submitted.	☒Continuous ☐Intermittent
033 - NO. 3 BOILER [25 Pa. Code §145.6] (Standard requirements.)	Section D - IV. Recordkeeping Requirements, #022	§ 145.6(d) Standard requirements - Recordkeeping and reporting requirements. Unless otherwise provided, the owners and operators of the NOx budget source and each NOx budget unit at the source shall maintain at a central location and provided upon request by the Department or the NOx budget ...	PADEP approved CEMs/DAHS in place, PADEP's Continuous Source Monitoring Manual, CEMS QA/QC program, environmental files.	☒Continuous ☐Intermittent
033 - NO. 3 BOILER [25 Pa. Code §145.30.] (Compliance certification report.)	Section D - V. Reporting Requirements, #024	For each control period in which one or more NOx budget units at a source are subject to the NOx budget emissions limitation, the NOx authorized account representative of the source shall submit to the Department and the NOx Budget Administrator by November 30 of that year, a compliance certificate...	Compliance certification submitted.	☒Continuous ☐Intermittent
033 - NO. 3 BOILER [25 Pa. Code §145.74.] (Recordkeeping and reporting.)	Section D - V. Reporting Requirements, #025	a) The authorized account representative shall submit to the Department and to the NOx Budget Administrator a quarterly emissions report in accordance with the requirements of § 145.74(d). b) The NOx authorized account representative shall submit to the Department and the NOx Budget Administrator a ...	Reports submitted.	☒Continuous ☐Intermittent
033 - NO. 3 BOILER [25 Pa. Code §123.115] (Initial NOx allowance NOx allocations.)	Section D - VII. Additional Requirements, #034	(a) This source is contained in Appendix E and is, therefore, subject to the requirements of 123.101-123.114, 123.116-123.120 and this section. This source is allocated 445 NOx allowances for the 1999-2002 NOx allowance control period as listed in Appendix A. Except as provided in 123.120 (relating..	Replaced by CAIR Program.	☒Continuous ☐Intermittent
033 - NO. 3 BOILER [25 Pa. Code §127.441] (Operating permit	Section D - VII. Additional Requirements, #035	§§ 145.1-145.90 NOx Budget Trading Program Incorporation. The emission limitations, monitoring and all other requirements of the NOx budget Trading Program established in	Compliant with regulation.	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
terms and conditions.)		25 PA. Code §§ 145.1-145.90 are hereby incorporated by reference.		
033 - NO. 3 BOILER [25 Pa. Code §145.6] (Standard requirements.)	Section D - VII. Additional Requirements, #036	§ 145.6(c) Standard requirements - Excess Emissions. The owners and operators of a NOx budget unit that has excess emissions in any control period shall do the following: Surrender the NOx allowances required for deduction under § 145.54(d)(1) (relating to compliance).	No excess emissions in report period.	☒Continuous ☐Intermittent
033 - NO. 3 BOILER [25 Pa. Code §145.6] (Standard requirements.)	Section D - VII. Additional Requirements, #037	§145.6(b) Standard requirements - NOx Requirements. 1) The owners and operators of each NOx budget source and each NOx budget unit at the source shall hold NOx allowances available for compliance deductions under § 145.54 (relating to compliance), as of the NOx allowance transfer deadline, in the...	Adequate NOx allowances provided.	☒Continuous ☐Intermittent
033 - NO. 3 BOILER [25 Pa. Code §145.90.] (Emission reduction credit provisions.)	Section D - VII. Additional Requirements, #038	NOx budget units may create, transfer and use emission reduction credits (ERCs) in accordance with Chapter 127 and §145.90. ERCs may not be used to satisfy NOx allowance requirements.	ERCs not used for compliance with program.	☒Continuous ☐Intermittent
034 - NO. 4 BOILER [25 Pa. Code §123.11] (Combustion units)	Section D - I. Restrictions - Emission Restriction(s), #001	(a) A person may not permit the emission into the outdoor atmosphere of particulate matter from this combustion unit in excess of the rate of 0.1 pounds per million Btu of heat input.	PM Stack test performed 4/21&22/10 resulted in a filterable PM measurement of 0.018 lb/mmBtu.	☒Continuous ☐Intermittent
034 - NO. 4 BOILER [25 Pa. Code §123.22] (Combustion units)	Section D - I. Restrictions - Emission Restriction(s), #002	No person may permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO2 from a combustion unit in excess of the rates set forth in the following table: ...	No SO2 CEMs measured exceedances during certification period.	☒Continuous ☐Intermittent
034 - NO. 4 BOILER [25 Pa. Code §123.41] (Limitations)	Section D - I. Restrictions - Emission Restriction(s), #003	A person may not permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following: (1) Equal to or greater than 20% for a period or periods aggregating more than three minutes in any 1 hour. (2) Equal ...	Daily Reference Method 9 Visible Emissions Readings.	☒Continuous ☐Intermittent
034 - NO. 4 BOILER [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - I. Restrictions - Emission Restriction(s), #004	As required in the special conditions of RACT Operating Permit 63-000-014: a) Emissions of NOx (nitrogen oxides, expressed as NO2) from the Main stack shall not exceed 0.57 pounds NO2 per million BTU, based on a thirty (30) day rolling average.	No NOx CEMs measured exceedances occurred during certification period.	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
		b) Emissions of NOx (nitrogen oxides, expressed as...		
034 - NO. 4 BOILER [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - I. Restrictions - Emission Restriction(s), #005	a) Emission of sulfur oxides, expressed as SO2, from the main stack shall not exceed 0.6 lbs/MMBtu at any 24-hr rolling average period. b) Emission of sulfur oxides, expressed as SO2, from the main stack shall not exceed 14,669.3 tons/yr at any 12 month rolling average period. Compliance with these...	No SO2 CEMs measured exceedances occurred during certification period.	☒Continuous ☐Intermittent
034 - NO. 4 BOILER [25 Pa. Code §145.10.] (Authorization and responsibilities of the NOx authorized account representative.)	Section D - I. Restrictions - Emission Restriction(s), #006	1) [§ 145.10(a)] Except as provided under §145.11 (relating to alternate NOx authorized account representative), each NOx budget source, including all NOx budget units at the source, shall have one, and only one, NOx authorized account representative, with regard to all matters under the NOx Budget...	The AAR became Matt Greek on 12/14/10 (changed from J. Derek Furstenwerth). The AAAR became Edward A. Feith on 12/3/10 (changed from Vincent J. Brisini).	☒Continuous ☐Intermittent
034 - NO. 4 BOILER [25 Pa. Code §145.74.] (Recordkeeping and reporting.)	Section D - I. Restrictions - Emission Restriction(s), #007	§ 145.74(c) Certification Applications. The NOx authorized account representative shall submit an application to the department within 45 days after completing all initial certification or recertification tests required under § 145.71 (relating to initial certification and recertification procedure...	PADEP approved CEMs/DAHS in place, and certification procedures completed.	☒Continuous ☐Intermittent
034 - NO. 4 BOILER [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - II. Testing Requirements, #008	The owner/operator shall perform stack testing on the units 1-4 for particulate emissions annually and for VOC emissions at least once during the term of this Title V operating permit. a. All stack testing shall be performed in accordance with 40 CFR 60.8 and 60.335, Title 25 PA Code chapter 1...	The 8/2/05 Stack tests indicated a VOC of 0.0019 lb/mmBtu.	☒Continuous ☐Intermittent
034 - NO. 4 BOILER [25 Pa. Code §123.25] (Monitoring requirements)	Section D - III. Monitoring Requirements, #009	(a) The owner or operator shall install, operate and maintain continuous SO2 monitoring systems in compliance with Chapter 139 Subchapter C (relating to requirements of continuous in-stack monitoring for stationary sources). Results of emission monitoring shall be submitted to the Department on a...	PADEP approved CEMs/DAHS in place, PADEP's Continuous Source Monitoring Manual, CEMS QA/QC program.	☒Continuous ☐Intermittent
034 - NO. 4 BOILER [25 Pa. Code §123.51] (Monitoring requirements)	Section D - III. Monitoring Requirements, #010	(a) The owner or operator shall install, operate and maintain continuous nitrogen oxides monitoring systems and other monitoring systems to convert data to required reporting units in compliance with Chapter 139, Subchapter C (relating to requirements for continuous in-stack monitoring for statut...	PADEP approved CEMs/DAHS in place, PADEP's Continuous Source Monitoring Manual, CEMS QA/QC program.	☒Continuous ☐Intermittent
034 - NO. 4 BOILER	Section D - III.	a) Standard requirements - Monitoring requirements.	PADEP approved	☒Continuous

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §145.6] (Standard requirements.)	Monitoring Requirements, #011	1) The owners and operators and the NOx authorized account representative of each NOx budget source and each NOx budget unit at the source shall comply with the monitoring requirements of §§ 145.70 - 145.76 (relating to recordkeeping and recording...	CEMs/DAHS in place, PADEP's Continuous Source Monitoring Manual, CEMS QA/QC program.	☐Intermittent
034 - NO. 4 BOILER [25 Pa. Code §145.74.] (Recordkeeping and reporting.)	Section D - III. Monitoring Requirements, #012	§ 145.74(b) Standard requirements - Monitoring plans. 1) The owner or operator of a unit subject to an acid rain emissions limitation shall comply with requirements of 40 CFR 75.62 (relating to monitoring plan), except that the monitoring plan shall also include all of the information required by ...	The monitoring plan was submitted.	☒Continuous ☐Intermittent
034 - NO. 4 BOILER [25 Pa. Code §145.6] (Standard requirements.)	Section D - IV. Recordkeeping Requirements, #021	§ 145.6(d) Standard requirements - Recordkeeping and reporting requirements. Unless otherwise provided, the owners and operators of the NOx budget source and each NOx budget unit at the source shall maintain at a central location and provided upon request by the Department or the NOx budget ...	PADEP approved CEMs/DAHS in place, PADEP's Continuous Source Monitoring Manual, CEMS QA/QC program.	☒Continuous ☐Intermittent
034 - NO. 4 BOILER [25 Pa. Code §145.30.] (Compliance certification report.)	Section D - V. Reporting Requirements, #023	For each control period in which one or more NOx budget units at a source are subject to the NOx budget emissions limitation, the NOx authorized account representative of the source shall submit to the Department and the NOx Budget Administrator by November 30 of that year, a compliance certificate...	Compliance certification submitted	☒Continuous ☐Intermittent
034 - NO. 4 BOILER [25 Pa. Code §145.74.] (Recordkeeping and reporting.)	Section D - V. Reporting Requirements, #024	a) The authorized account representative shall submit to the Department and to the NOx Budget Administrator a quarterly emissions report in accordance with the requirements of § 145.74(d). b) The NOx authorized account representative shall submit to the Department and the NOx Budget Administrator a...	Reports submitted	☒Continuous ☐Intermittent
034 - NO. 4 BOILER [25 Pa. Code §123.115] (Initial NOx allowance NOx allocations.)	Section D - VII. Additional Requirements, #033	(a) This source is contained in Appendix E and is, therefore, subject to the requirements of §§123.101-123.114, 123.116-123.120 and this section. This source is allocated 1,013 NOx allowances for the 1999-2002 NOx allowance control period as listed in Appendix A. Except as provided in 123.120 ...	Replaced by CAIR Program	☒Continuous ☐Intermittent
034 - NO. 4 BOILER [25 Pa. Code §127.441] (Operating permit	Section D - VII. Additional Requirements, #034	§§ 145.1-145.90 NOx Budget Trading Program Incorporation. The emission limitations, monitoring and all other requirements of the NOx budget Trading Program established in	Compliant with regulation.	☒Continuous ☐Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
terms and conditions.)		25 pa. Code §§ 145.1-145.90 are hereby incorporated by reference.		
034 - NO. 4 BOILER [25 Pa. Code §145.6] (Standard requirements.)	Section D - VII. Additional Requirements, #035	§ 145.6(c) Standard requirements - Excess Emissions. The owners and operators of a NOx budget unit that has excess emissions in any control period shall do the following: Surrender the NOx allowances required for deduction under § 145.54(d)(1) (relating to compliance).	No excess emissions in report period.	☒Continuous ☐Intermittent
034 - NO. 4 BOILER [25 Pa. Code §145.6] (Standard requirements.)	Section D - VII. Additional Requirements, #036	§145.6(b) Standard requirements - NOx Requirements. 1) The owners and operators of each NOx budget source and each NOx budget unit at the source shall hold NOx allowances available for compliance deductions under § 145.54 (relating to compliance), as of the NOx allowance transfer deadline, in the...	Adequate NOx allowances provided.	☒Continuous ☐Intermittent
034 - NO. 4 BOILER [25 Pa. Code §145.90.] (Emission reduction credit provisions.)	Section D - VII. Additional Requirements, #037	NOx budget units may create, transfer and use emission reduction credits (ERCs) in accordance with Chapter 127 and §145.90. ERCs may not be used to satisfy NOx allowance requirements.	ERCs not used for compliance with program.	☒Continuous ☐Intermittent

42-125-00012

RRI Energy

121 Champion Way
Canonsburg, PA 15317

July 9, 2010

overnight mail

Mr. Mark Wayner
Pennsylvania Department of Environmental Protection
Southwest Regional Office
400 Waterfront Drive
Pittsburgh, PA 15222-4745

RE: Submittal of semi-annual compliance report for Elrama Power Plant, Title V permit # 63-00014

Dear Mr. Wayner:

The semi-annual compliance report for the Elrama Power Plant for the first half of 2010 as required by Section B, Condition #023 is enclosed.

Orion Power Midwest, L.P. conducted the monitoring required by Title V Operating Permit No. 63-00014 during the reporting period and is identifying deviations in the attached form which was previously approved by the Department.

If you have questions or concerns, please contact me at 724-597-8631 or Zane Snyder at 412-382-6945.

Thank you,

Michelle Dolfi

Michelle Dolfi
Sr. Air Quality Specialist

RECEIVED
JUL 13 2010
Division Director (3AP00)

encl.

cc: Barb Hatch (PA DEP SWRO)
EPA Region 3 - Associate Director for Enforcement and Permit Review (3AP10)
Keith Schmidt
Zane Snyder
Rocky Tondo
file

RRI ENERGY, INC.
SEMI-ANNUAL REPORT OF REQUIRED MONITORING AND DEVIATIONS PER 25 PA CODE §127.511(c)

RRI Energy Subsidiary Name:	Orion Power Midwest, L.P.	**Contact Person:**	Zane K. Snyder
Plant Name:	Elrama Power Plant	**Title:**	EHS Coordinator, Elrama Power Plant
Title V Operating Permit #:	63-00014	**Phone # and Email:**	412-382-6945; zksnyder@rrienergy.com
Reporting Period Start:	1/1/2010	**Reporting Period End:**	06/30/2010

PART I **The reports of required monitoring are attached to this form. A list of the reports of required monitoring is presented below:**

TVOP Cond. #	Report Description
	none

PART II **A summary of deviations from permit requirements is presented below [1]:**

TVOP Cond. #	Source	Deviations from Permit Requirements				
		Nature and Probable Cause	Dates and Times	Duration	Monitoring Method(s)	Corrective Action(s)

1: For constituents measured by continuous emission monitoring systems (CEMS), compliance with permit conditions is determined using the emissions data submitted to the Department in accordance with 25 Pa. Code 139 requirements. Information regarding specific instances of deviations, if any, is included in the CEMS monitoring data reports that are submitted to the DEP on a quarterly basis.

PART III **Certification of Truth, Accuracy and Completeness by a Responsible Official Per 25 Pa. Code §127.402(d)**

Subject to the penalties of Title 18 Pa. C.S. Section 4904 and 35 P.S. Section 4009 (b) (2), I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this form are true, accurate, and complete.

Name:	Matt Greek	**Title:**	Vice President
Signed:	Matt E. Greek	**Date:**	July 8, 2010

This report must be signed by a responsible official. The owner/operator shall identify any other material information needed in this report to also comply with section 113(c)(2) of the Clean Air Act. This report does not include information pertaining to the submission of malfunction and CEM reports.