WEST COAST
ENVIRONMENTAL
AND ENGINEERING

2007-2008
Annual Title V
Compliance Certification

Weyerhaeuser Company
5936 Perkins Road
Oxnard, CA 93033

April 25, 2008

Prepared for: Weyerhaeuser Company
P.O. Box 519
Port Hueneme, California 93044

Prepared by: West Coast Environmental
and Engineering
1838 Eastman Ave., Suite 200
Ventura, California 93003
(805) 644-7976

WCE Project #: WEY240

1838 Eastman Avenue
Suite 200
Ventura, CA 93003
Phone 805/644-7976
Fax 805/644-5929

21550 Oxnard Street
Suite 300
Woodland Hills, CA 91367
Phone 818/224-6628
Fax 818/224-6629

www.wcenviro.com

TABLE OF CONTENTS

2007 - 2008
Annual Title V Compliance Certification
Weyerhaeuser Company – Hueneme Mill
April 25, 2008

Section 1 TVPF45 – Cover Sheet

Section 2 TVPF46 – Applicable Requirement or Part 70 Permit Attachments

Requirement ID	Description
74.15N3-0157	Exemption from Rule 74.15.B.1 for emergency standby units (Nebraska Boiler) when a breakdown occurs to the primary unit. (74.15.C.3 Tuning and fuel metering requirements for units exempt per Rule 74.15.C.3).
103N4-0157	Requirement for Continuous Emission Monitoring System (CEMS)
STRMLN157-NOx, CO, NH3	Annual source test, CEM data and operational parameter reporting. Monthly fuel consumption reports and emission limits.
STRMLN157-SOx	Streamline for sulfur content in fuel and SOx emission limits located in Rules 54 and 64, 40 CFR Part 60 Subpart GG.
PO0157PC1 - Condition 1	General Recordkeeping
PO0157PC1 - Condition No. 2	Rule 26 and Rule 29 Solvent Record Keeping
PO0157PC2 - Condition No. 1	Rule 26 Annual NOx and CO Emissions Limits for GE Turbine and Coen Duct Burner (Cogen Unit)
PO0157PC2 - Condition No. 2	Rule 26 Natural Gas Only
PO0157PC2 - Condition No. 3	Rule 26 Turbine and Boiler Simultaneous Operation
PO0157PC2 - Condition Nos. 4 & 5	Rule 26 NOx Emission Limits for Nebraska Boiler
PO0157PC2 - Condition Nos. 6, 7, and 8	Rule 26 Fuel Combustion Requirements for Nebraska Boiler
PO0157PC2 - Condition No. 9	Rule 29 Fuel Metering Requirements for Maxon Duct Burner
50	Opacity
52	Particulate Matter Concentration (Grain Loading)

TABLE OF CONTENTS (continued)

2007 - 2008
Annual Title V Compliance Certification
Weyerhaeuser Company - Hueneme
April 25, 2008

Requirement ID	Description
54.B.1	Discharge of sulfur compounds calculated as sulfur dioxide (SO2) not to exceed 300 ppmv from any combustion operation.
54.B.2	Discharge of sulfur dioxide (SO2) shall not exceed an average ground or sea level concentration at any point at or beyond the property line in excess of 0.25 ppmv averaged for 1 hour, or 0.04 ppmv averaged for 24 hours.
57.B	Shall not discharge into the atmosphere from any fuel burning equipment combustion contaminants exceeding at the point of discharge, of 0.1 grain per cubic foot of gas calculated to 12% of CO2 at standard conditions.
57.1	Emissions of particulate matter shall not exceed 0.12 pounds per million BTU of fuel input.
64.B.1	No person shall burn gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet (g/Hcf) of gaseous fuel (788 ppmb), except for natural gas which is limited to 15 g/Hcf (236 ppmv), calculated as H2S at standard conditions.
64.B.2	Emissions from combustion of solid or liquid fuels must be less than emissions which would occur form the uncontrolled combustion of such fuels with a sulfur content of 0.5% by weight.
68	Requirement that carbon monoxide (CO) emissions not exceed 2,000 ppmv. This rule does not apply to emissions from internal combustion engines.
74.6	Requirements that minimize the emissions of reactive organic solvents and photochemically reactive solvents.
74.11.1	Requirements to sell and install large water heaters and small boilers that are certified or meet NOx and CO limits.
74.22	Natural Gas-Fired, Fan-Type Central Furnaces
74.1	Short-Term Activity - Abrasive Blasting
74.2	Short Term Activity - Architectural Coatings
40CFR61.M	Short Term Activity - National Emission Standard for Asbestos
40CFR68 RMP	Risk Management Plan
40CFR82	Protection Of Stratospheric Ozone

Section 3 TVPF47 – Quantifiable Applicable Requirement or Part 70 Permit Condition Attachment

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Cover Sheet
Form TVPF45/12-24-98 Page 2 of 2

Mr. Matt Haber, Chief
Permits Office (AIR-3)
Office of Air Division
EPA Region IX
75 Hawthorne Street
San Francisco, CA 94105

Confidentiality

All information in a Part 70 permit compliance certification is public information. The Part 70 permit is also public information.

Certification by Responsible Official

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this compliance certification are true, accurate, and complete.

Signature and Title of Responsible Official:		Date:
Rudy Rehbein	Title: Plant Manager	4/30/08

Time Period Covered by Compliance Certification:

04/01/07 to 03/31/08

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment
Form TVPF46/12-24-98 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: 74.6.1N1 (effective until 07/01/04)	Description: Cold Cleaners Only - Free Board Ratio Compliance for High or Low Volatility Solvents.

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Operation exempt because solvent has less than 2% VOC by weight.

2. Yes — Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method is continuous or intermittent:

   Continuous – As indicated by a continuous monitoring device
   X Intermittent – As indicated by non- continuous periodic monitoring

4. No — During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5. No — During the time period covered by this compliance certification, does the monitoring data indicate any exceedences, if applicable? An *exceedence* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

6. No — During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?

7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedences, or other indication of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.

8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification

04/01/07 to 03/31/08

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
74.6.1N2 (effective until 07/01/04)	Remote Reservoir Cleaners Only - Free Board Ratio Compliance for High or Low Volatility Solvents.

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Operation exempt because solvent has less than 2% VOC by weight.

2. Yes — Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method is continuous or intermittent:

   Continuous – As indicated by a continuous monitoring device
   X Intermittent – As indicated by non- continuous periodic monitoring

4. No — During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5. No — During the time period covered by this compliance certification, does the monitoring data indicate any exceedences, if applicable? An *exceedence* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

6. No — During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?

7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedences, or other indication of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.

8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification

04/01/07 to 03/31/08

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment
Form TVPF46/12-24-98 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
74.15N3-0157	Exemption from Rule 74.15.B.1 for emergency standby units (Nebraska Boiler) when a breakdown occurs to the primary unit. (74.15.C.3 Tuning and fuel metering requirements for units exempt per Rule 74.15.C.3).

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Unit operated 1.4 hours and burned .0333 MMcf of natural gas during the compliance year. No diesel fuel was burned. Breakdown reports are attached to STRMLN157-NOx, CO, NH3. Unit operated less than 10 days (240 hr), therefore no tune-up was performed.

2. Yes — Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method is continuous or intermittent:

   Continuous – As indicated by a continuous monitoring device
   X Intermittent – As indicated by non- continuous periodic monitoring

4. No — During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5. No — During the time period covered by this compliance certification, does the monitoring data indicate any exceedences, if applicable? An *exceedence* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

6. No — During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?

7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedences, or other indication of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.

8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification

04/01/07 to 03/31/08

Attachment to 74.15N3-0157

Month	gas comsuption SCF	Uptime hours
April-07	0	0
May-07	0	0
June-07	0	0
July-07	0	0
August-07	0	0
September-07	0	0
October-07	0	0
November-07	0	0
December-07	14,615	0.4
January-08	18,703	0.95
February-08	0	0
March-08	0	0
Total	**33,317**	**1.4**

Nebraske Fuel Consumption(scf) 33,317
Capacity Factor: 0.00%

Sample Calculation of the Capacity factor:

Capacity Factor = Annual Fuel Usage * HHV natural gas /(Equipment rating * Hours/year)

Capacity Factor = (.0333 MMcf/yr) * (1017 BTU/cf) / ((108 MMBtu/hr) * (8760hr/yr))

= 0.0000

= 0.00%

Attachment to 74.15N3-0157

Month	gas comsuption SCF	Uptime hours
April-06	0	0
May-06	0	0
June-06	0	0
July-06	0	0
August-06	0	0
September-06	0	0
October-06	0	0
November-06	0	0
December-06	786,554	11.68
January-07	0	0
February-07	8,029,440	113.62
March-07	0	0
Total	**8,815,994**	**125.3**

Nebraske Fuel Consumption(scf) 8,815,994
Capacity Factor: 0.95%

Sample Calculation of the Capacity factor:

Capacity Factor = Annual Fuel Usage * HHV natural gas /(Equipment rating * Hours/year)

Capacity Factor = (8.8 MMcf/yr) * (1017 BTU/cf) / ((108 MMBtu/hr) * (8760hr/yr))

= 0.0095

= 0.95%

inserted for reference/gN

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment
Form TVPF46/12-24-98 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
103N5-0157	Requirement for Continuous Emission Monitoring System (CEMS).

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Monthly records of fuel consumption and the capacity factor for the Nebraska boiler, which is calculated to be 0.00%, are attached to 74.15N3-0157. CEM for NOx (see PO0157PC2, Condition 4).

2. Yes — Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method is continuous or intermittent:

   X Continuous – As indicated by a continuous monitoring device
   Intermittent – As indicated by non- continuous periodic monitoring

4. No — During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5. No — During the time period covered by this compliance certification, does the monitoring data indicate any exceedences, if applicable? An *exceedence* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

6. No — During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?

7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedences, or other indication of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.

8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification

04/01/07 to 03/31/08

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
STRMLN157- NOx, CO, NH3	Annual source test, CEM data and operational parameter reporting. Monthly fuel consumption reports and emission limits.

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Excerpts from source tests conducted on February 21, 2008 are attached. Sampling for NOx, CO & O2 - EPA Method 20 and CARB Method 100, NH3 - BAAQMD Method ST-1B, HHV of gaseous fuel - ASTM Method D1826-88, HHV of fuel oil - ASTM Method 240-87. CEM data for other operating parameters maintained on site.

2. Yes — Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method is continuous or intermittent:

X Continuous – As indicated by a continuous monitoring device
Intermittent – As indicated by non- continuous periodic monitoring

4. Yes
See Breakdown Reports — During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5. Yes
See Breakdown Reports — During the time period covered by this compliance certification, does the monitoring data indicate any exceedences, if applicable? An *exceedence* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

6. No — During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?

7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedences, or other indication of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.

8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification

04/01/07 to 03/31/08

1.0 Introduction

Accurate Environmental Services, Inc. (Accurate Environmental) has been contracted by Weyerhaeuser Company (WYH) to perform the Compliance source test for the Weyerhaeuser Company, Oxnard Facility, Turbine associated with an SCR located in Oxnard, California. The test was conducted to meet the requirements of the Ventura County Air Pollution Control District (VCAPCD) Permit to Operate. Compliance mandates testing of Nitrogen Oxides (NOx), Carbon Monoxide (CO) and Ammonia (NH_3).

This report documents the results of Compliance source test performed on 02/21/2008. Accurate Environmental is an independent test contractor with no conflict of interest as defined by Rules. The Accurate Environmental test team consisted of Wally Moe, Hassan Amin and Ben Benderra. Stephanie Fella of Weyerhaeuser Company coordinated the testing.

Executive Summary

Plant	Weyerhaeuser Company
Address	5936 Perkins Road Oxnard, CA 93033
Sources	Turbine associated with an SCR
Facility ID Number	N/A
Permits Number	157
Test Date	02/21/2008
Test Performed By	Accurate Environmental Services, Inc.
Testing Personnel	Wally Moe, Hassan Amin and Ben Benderra
Testing Firm Contact	Wally Moe (714) 379-9200
Plant Contact	Stephanie Fella (562) 495-5777
Air Pollution Control District	Ve[illegible]unty Air Pollution Control District

2.0 Summary of Results

The test consisted of NO_x, CO, O_2, CO_2, and NH_3 concentration measurements. The NO_x, CO and NH_3 concentration were corrected to 15% oxygen and compared to the permitted concentration limits. The NO_x and CO portions of the test program were performed using CARB method 100 and the NH_3 was performed using Bay Area AQMD Method ST-1B. The results show the source is in compliance with the permitted NO_x, CO and NH_3 concentration limits.

The Compliance Test results are summarized in Table 2-1. Tables 2-2, 2-3, 2-4 and 2-5 present Summaries of the Reference Method Quality Assurance Checks.

Table 2-1
Summary of Results

Parameter	Units	Run 1	Run 2	Run 3	Allowable Limit	Pass / Fail
NOx	ppm	11.47	11.64	11.04	n/a	n/a
NO_x, @ 15% O_2	ppm	11.00	11.02	10.56	12 ✓	Pass
NO_x Emission Rate	lb/hr	12.28	12.13	11.74	85	Pass
CO	ppm	37.21	32.89	36.11	n/a	n/a
CO, @ 15% O_2	ppm	35.68	31.13	34.53	n/a	n/a
CO Emission Rate	lb/hr	24.26	20.86	23.37	59.65	Pass
NH_3	ppm	4.82	4.80	3.71	n/a	n/a
NH_3, @ 15% O_2	ppm	4.62	4.54	3.55	5.00*	Pass
NH_3 Emission Rate	lb/hr	3.14	3.04	2.40	9.23	Pass
O_2, RM	%	14.75	14.67	14.73	n/a	n/a
O_2, Facility	%	14.23	14.22	14.19	n/a	n/a
Stack Flow, Facility	dscfm	149,509	145,459	148,439	n/a	n/a
Firing Rate	MMBtu/hr	303.14	298.9	301.9	340.8	n/a
%Firing Rate	%	89.0	87.7	88.6	n/a	n/a

* Rule 74.23 and Permit limit NH_3 emission @ 20 ppm.
J. N.

Table 2-2
Reference Method QA/QC Summary
Run 1-Compliance

	High Span Cylinder		Mid Span Cylinder	
	Cylinder No.	Concentration	Cylinder No.	Concentration
Zero		0		0
O_2	SA 5308	20.05	CC 81538	11.50
CO_2	SA 3055	8.58	CC 81538	4.62
NO_x	SA 12955	23.05	CC 241372	11.80
CO	CC 144834	90.60	CC 139887	46.20

Parameter	Analyzer					Status
	O_2	CO_2	NO_x	CO		
Analyzer Range	25	10	25	100		
Zero Gas Concentration	0.00	0.00	0.00	0.00		
High Gas Concentration	20.05	8.58	23.05	90.60		
Mid Gas Concentration	11.50	4.62	11.80	46.20		
Initial Response, Zero	0.05	0.01	-0.07	0.00		
Initial Response, High	20.06	8.58	22.96	90.60		
Initial Response, Mid	11.46	4.70	11.85	46.30		
Final Response, Zero	0.00	0.01	-0.07	0.00		
Final Response, High	20.01	8.59	22.81	91.70		
Final Response, Mid	11.45	4.67	11.78	46.60		
Initial Error (% of scale), Zero	0.2%	0.1%	-0.3%	0.0%		PASS
Initial Error (% of scale), High	0.0%	0.0%	-0.4%	0.0%		PASS
Initial Error (% of scale), Mid	-0.2%	0.8%	0.2%	0.1%		PASS
Final Error (% of scale), Zero	0.0%	0.1%	-0.3%	0.0%		PASS
Final Error (% of scale), High	-0.2%	0.1%	-1.0%	1.1%		PASS
Final Error (% of scale), Mid	-0.2%	0.5%	-0.1%	0.4%		PASS
Linearity at Mid Point, Pre-test	0.3%	-0.8%	-0.5%	-0.1%		PASS
Linearity at Mid Point, Post-test	0.1%	-0.4%	-0.6%	0.2%		PASS

Error Calculation: (Analyzer Response - Actual Span Value)/Range * 100%

Table 2-3
Reference Method QA/QC Summary
Run 1-2 RATA/Run 2 Compliance

	High Span Cylinder		Mid Span Cylinder	
	Cylinder No.	Concentration	Cylinder No.	Concentration
Zero		0		0
O2	SA 5308	20.05	CC 81538	11.50
CO2	SA 3055	8.58	CC 81538	4.62
NOx	SA 12955	23.05	CC 241372	11.80
CO	CC 144834	90.60	CC 139887	46.20

Parameter	Analyzer					Status
	O_2	CO_2	NO_x	CO		
Analyzer Range	25	10	25	100		
Zero Gas Concentration	0.00	0.00	0.00	0.00		
High Gas Concentration	20.05	8.58	23.05	90.60		
Mid Gas Concentration	11.50	4.62	11.80	46.20		
Initial Response, Zero	0.00	0.01	-0.07	0.00		
Initial Response, High	20.01	8.59	22.81	91.70		
Initial Response, Mid	11.45	4.67	11.78	46.60		
Final Response, Zero	0.02	0.00	0.00	0.50		
Final Response, High	20.10	8.57	22.96	90.40		
Final Response, Mid	11.46	4.67	11.90	46.20		
Initial Error (% of scale), Zero	0.0%	0.1%	-0.3%	0.0%		PASS
Initial Error (% of scale), High	-0.2%	0.1%	-1.0%	1.1%		PASS
Initial Error (% of scale), Mid	-0.2%	0.5%	-0.1%	0.4%		PASS
Final Error (% of scale), Zero	0.1%	0.0%	0.0%	0.5%		PASS
Final Error (% of scale), High	0.2%	-0.1%	-0.4%	-0.2%		PASS
Final Error (% of scale), Mid	-0.2%	0.5%	0.4%	0.0%		PASS
Linearity at Mid Point, Pre-test	0.1%	-0.4%	-0.6%	0.2%		PASS
Linearity at Mid Point, Post-test	0.3%	-0.6%	-0.6%	0.1%		PASS

Error Calculation: (Analyzer Response - Actual Span Value)/Range * 100%

Table 2-4
Reference Method QA/QC Summary
Run 3-4 RATA/Run 2 Compliance

	High Span Cylinder		Mid Span Cylinder	
	Cylinder No.	Concentration	Cylinder No.	Concentration
Zero		0		0
O2	SA 5308	20.05	CC 81538	11.50
CO2	SA 3055	8.58	CC 81538	4.62
NOx	SA 12955	23.05	CC 241372	11.80
CO	CC 144834	90.60	CC 139887	46.20

Parameter	Analyzer					Status
	O_2	CO_2	NO_x	CO		
Analyzer Range	25	10	25	100		
Zero Gas Concentration	0.00	0.00	0.00	0.00		
High Gas Concentration	20.05	8.58	23.05	90.60		
Mid Gas Concentration	11.50	4.62	11.80	46.20		
Initial Response, Zero	0.02	0.00	0.00	0.50		
Initial Response, High	20.10	8.57	22.96	90.40		
Initial Response, Mid	11.46	4.67	11.90	46.20		
Final Response, Zero	0.07	0.01	-0.02	0.10		
Final Response, High	20.15	8.55	22.98	90.50		
Final Response, Mid	11.49	4.65	11.88	46.00		
Initial Error (% of scale), Zero	0.1%	0.0%	0.0%	0.5%		PASS
Initial Error (% of scale), High	0.2%	-0.1%	-0.4%	-0.2%		PASS
Initial Error (% of scale), Mid	-0.2%	0.5%	0.4%	0.0%		PASS
Final Error (% of scale), Zero	0.3%	0.1%	-0.1%	0.1%		PASS
Final Error (% of scale), High	0.4%	-0.3%	-0.3%	-0.1%		PASS
Final Error (% of scale), Mid	0.0%	0.3%	0.3%	-0.2%		PASS
Linearity at Mid Point, Pre-test	0.3%	-0.6%	-0.6%	0.1%		PASS
Linearity at Mid Point, Post-test	0.4%	-0.4%	-0.5%	0.2%		PASS

Error Calculation: (Analyzer Response - Actual Span Value)/Range * 100%

Table 2-5
Reference Method QA/QC Summary
Run 5-6 RATA/Run 3 Compliance

	High Span Cylinder		Mid Span Cylinder	
	Cylinder No.	Concentration	Cylinder No.	Concentration
Zero		0		0
O2	SA 5308	20.05	CC 81538	11.50
CO2	SA 3055	8.58	CC 81538	4.62
NOx	SA 12955	23.05	CC 241372	11.80
CO	CC 144834	90.60	CC 139887	46.20

Parameter	Analyzer					Status
	O_2	CO_2	NO_x	CO		
Analyzer Range	25	10	25	100		
Zero Gas Concentration	0.00	0.00	0.00	0.00		
High Gas Concentration	20.05	8.58	23.05	90.60		
Mid Gas Concentration	11.50	4.62	11.80	46.20		
Initial Response, Zero	0.07	0.01	-0.02	0.10		
Initial Response, High	20.15	8.55	22.98	90.50		
Initial Response, Mid	11.49	4.65	11.88	46.00		
Final Response, Zero	0.02	0.01	0.07	0.00		
Final Response, High	20.06	8.55	22.93	90.80		
Final Response, Mid	11.46	4.66	11.83	46.40		
Initial Error (% of scale), Zero	0.3%	0.1%	-0.1%	0.1%		PASS
Initial Error (% of scale), High	0.4%	-0.3%	-0.3%	-0.1%		PASS
Initial Error (% of scale), Mid	0.0%	0.3%	0.3%	-0.2%		PASS
Final Error (% of scale), Zero	0.1%	0.1%	0.3%	0.0%		PASS
Final Error (% of scale), High	0.0%	-0.3%	-0.5%	0.2%		PASS
Final Error (% of scale), Mid	-0.2%	0.4%	0.1%	0.2%		PASS
Linearity at Mid Point, Pre-test	0.4%	-0.4%	-0.5%	0.2%		PASS
Linearity at Mid Point, Post-test	0.2%	-0.5%	-0.2%	-0.1%		PASS

Error Calculation: (Analyzer Response - Actual Span Value)/Range * 100%

1.0 Introduction

Accurate Environmental Services, Inc. (Accurate Inc.) has been contracted by Weyerhaeuser Company (WYH) to perform the test audit of the Continuous Emission Monitoring System (CEMS) serving the Weyerhaeuser Company, Oxnard Facility Turbine associated with an SCR. The test was conducted to meet the requirements of the Ventura County Air Pollution Control District (VCAPCD) Regional Clean Air Incentives Market (RECLAIM) mandates testing of oxides of nitrogen (NO_x) and oxygen (O_2).

Testing was conducted according to the approved Test Protocol no. TP 0123 WYH. NO_x, CO, O_2, and CO_2 concentrations were determined in accordance with CARB Method 100. Nine test runs were conducted.

The Unit Control System was tuned according to the manufacturer specifications by Weyerhaeuser Company maintenance department prior to the start of the RATA test.

The test program was performed on 02/21/2008. The Accurate Inc. test team consisted of Wally Moe, Hassan Amin and Ben Benderra. Stephanie Fella of WYH coordinated the testing. According to facility personnel, there have been no significant changes to the CEMS since the last RATA.

Executive Summary

Plant	Weyerhaeuser Company
Address	5936 Perkins Road Oxnard, CA 93033
Source	Turbine associated with an SCR
Facility ID Number	N/A
Permit to Operate Number	157
Test Date	02/21/2008
Test Performed By	Accurate Environmental Services, Inc.
Testing Personnel	Wally Moe, Hassan Amin and Ben Benderra
Testing Firm Contact	Wally Moe (714) 379-9200
Plant Contact	Stephanie Fella (562) 495-5777
Air Pollution Control District	Ventura County Air Pollution Control District

2.0 Summary of Results

The RATA results are summarized in Table 2-1. The results show that the CEMS met the relative accuracy criteria. Since the concentration RA's are all less than 20%, the CEMS meets the incentive criteria. A comparison of the applicable Bias Adjustment Factors and K-factors from the previous RATA and this current RATA is provided in Table 2-2. Tables 2-3 through 2-5 present the Relative Accuracy calculations for Nitrogen Oxides (NO_x), Oxygen (O_2) and Carbon Monoxides (CO) concentrations.

Table 2-1
Summary of Results

Procedure	Parameter	Units	RM Data	Facility Data	RA Performance	RA Specification
Relative Accuracy	NO_x	ppmv	10.86	10.99	**3.87**	<20%
	CO	ppmv	33.06	29.18	**16.26**	<10%
	O_2	%	14.62	14.15	**3.83**	<20%
Bias Adj. Factor	NO_x	ppmv	**1.000**	n/a	**n/a**	n/a
	CO	ppmv	**1.133**	n/a	**n/a**	n/a
	O_2	%	**1.032**	n/a	**n/a**	n/a
Stratification	O_2	%	n/a	n/a	**n/a**	<10%
	NO_x	ppmv	n/a	n/a	**n/a**	<10%
Cyclonic Flow	Swirl Angle	degrees	n/a	n/a	**n/a**	<20

Since The CO Concentration difference between the Facility and RM Data is less than 5 ppm, the facility passes the RA.

Table 2-2
Comparison of Previous Operating Conditions,
BIAS Adjustment Factors

Parameter	Previous RATA	Current RATA
Date	N/A	02/21/2008
Operating Condition	N/A	301.9 MMBtu/hr
NOx Concentration BAF	N/A	1.000
CO Concentration BAF	N/A	1.133

Table 2-3
Relative Accuracy Test Audit:
NO_x Concentration

Run #	Date	End Time	RM Data		Facility Data		Diff	Diff	Active?
			NO_x ppm	NO_x lb/hr	NO_x ppm	NO_x lb/hr	ppm	lb/hr	Y/N
1	02/21/2008	11:47	11.52		10.96		0.56		Y
2	02/21/2008	13:08	10.81		10.98		-0.17		Y
3	02/21/2008	14:46	10.99		11.08		-0.09		Y
4	02/21/2008	15:19	10.42		11.00		-0.58		Y
5	02/21/2008	16:10	10.89		10.96		-0.07		Y
6	02/21/2008	16:43	10.22		10.98		-0.76		Y
7	02/21/2008	18:02	10.86		10.97		-0.11		Y
8	02/21/2008	18:35	11.03		10.96		0.07		Y
9	02/21/2008	19:08	11.05		11.06		-0.01		Y
10									N
11									N
12									N

Entries			9	
Average	**10.86**	**10.99**	**-0.13**	

	NO_x ppm
Standard Deviation, stdev=^(stdev(diff)))	**0.38**
t value (t, from Table 2-1, 40CFR60, app.B, spec.2)	**2.306**
Confidence Coefficient, cc=t*stdev/sqrt(n)	**0.29**
Relative Accuracy, =[abs(avg dif)+cc]/avg(RM)	**3.87**
BAF, (avg dif>cc)=abs(avg dif)/avg(Facility)+1	**1.000**

NOx ppm Since abs(d) < CC, The System Passes the Bias Test

Table 2-4
Relative Accuracy Test Audit:
O_2 Concentration

Run #	Date	End Time	RM Data O_2 % dry	Facility O_2 % dry	Difference	Active (Y/N)
1	02/21/2008	11:47	14.58	14.23	0.35	y
2	02/21/2008	13:08	14.78	14.21	0.57	Y
3	02/21/2008	14:46	14.69	14.21	0.48	Y
4	02/21/2008	15:19	14.84	14.21	0.63	Y
5	02/21/2008	16:10	14.63	14.21	0.42	Y
6	02/21/2008	16:43	14.66	14.14	0.52	Y
7	02/21/2008	18:02	14.40	13.96	0.44	Y
8	02/21/2008	18:35	14.41	14.15	0.26	Y
9	02/21/2008	19:08	14.56	14.00	0.56	Y
10						N
11						N
12						N

Entries		9	
Average	**14.62**	**14.15**	**0.47**

	O_2%
Standard Deviation, stdev=^(stdev(diff)))	**0.12**
t value (t, from Table 2-1, 40CFR60, app.B, spec.2)	**2.306**
Confidence Coefficient, cc=t*stdev/sqrt(n)	**0.09**
Relative Accuracy, =[abs(avg dif)+cc]/avg(RM)	**3.83**
BAF, (avg dif>cc)=abs(avg dif)/avg(Facility)+1	**1.032**

Since abs(d) < CC, The System Passes the Bias Test

Table 2-5
Relative Accuracy Test Audit:
Stack Gas Flow Rate

Run #	Date	End Time	RM Data CO ppm		Facility Data CO ppm		Diff ppm		Active? Y?N
1	2/21/08	11:47	29.36		26.68		2.68		Y
2	2/21/08	13:08	33.86		26.63		7.23		Y
3	2/21/08	14:46	30.41		28.69		1.72		Y
4	2/21/08	15:19	32.93		28.34		4.59		Y
5	2/21/08	16:10	34.49		30.38		4.11		Y
6	2/21/08	16:43	35.26		30.89		4.37		Y
7	2/21/08	18:02	34.43		30.28		4.15		Y
8	2/21/08	18:35	34.84		29.52		5.32		Y
9	2/21/08	19:08	31.91		31.22		0.69		Y
10									N
11									N
12									N
Entries							9		
Average			**33.06**		**29.18**		**3.88**		

	CO ppm
Standard Deviation, stdev=^(stdev(diff)))	**1.95**
t value (t, from Table 2-1, 40CFR60, app.B, spec.2)	**2.306**
Confidence Coefficient, cc=t*stdev/sqrt(n)	**1.50**
Relative Accuracy, =[abs(avg dif)+cc]/avg(RM)	**16.26**
BAF, (avg dif>cc)=abs(avg dif)/avg(Facility)+1	**1.133**

3.0 Facility CEMS Description

The Facility CEMS consist of the following components provided in Table 3-1. A flow schematic of the CEMS arrangement is presented in Figure 3-1. The system directly extracts a stack gas sample, and then continuously measures NO_x, CO and O_2 concentrations. The CEMS is equipped with NO_x, CO and O_2 analyzers. The analyzer ranges are chosen to assure that the measured concentrations fall between 10% and 95% of CEMS full scale.

A continuous gas sample was extracted from the stack through a probe assembly and transported through heated Teflon sample line to the analyzer enclosure.

Table 3-1
Facility CEMS Major Components

Component	Make	Model	Serial Number	Range
NO_x analyzer	Rosemount	NGA 2000	n/a	0-100 ppmv
CO analyzer	Rosemount	NGA 2000	n/a	0-100 ppmv
O_2 analyzer	Rosemount	NGA 2000	n/a	0-25%

"Breakdown"

Weyerhaeuser
The future is growing™

5936 Perkins Rd
Oxnard CA 93033
PO Box 519
Port Hueneme CA 93044
Tel (805) 986 3881
Fax (805) 488 5186

May 11, 2007

Lyle Olson
County of Ventura
Air Pollution Control District
669 County Square Drive
Second Floor
Ventura, CA. 93003

Re: May 9 Breakdown

Dear Mr. Olson:

This letter is a follow up on the telephone call made by Charlie Wilson on May 9, 2007, at approximately 2:00 PM, to the VCAPCD Breakdown Center Hotline

On May 9, 2007, the Cogen Operator noticed the DCS Display page was showing incorrect values for the CO and O2. He contacted the Maintenance Manager to troubleshoot the issue. It was determined that the Rosemont CEMS was not sending the signals to the ABB DCS system, but it was still sending the Stack and Inlet NOx signals. Immediately, the Ammonia control valve was placed in manual to control the NOx emissions since the O2 value was erroneous. Next it was discovered that the Rosemont CEMS MLT module, which has the CO and O2 sensors, had a failed signal reading, "detector signal communication failed." In order to clear this failed signal the Rosemont CEMS were prepared to cycle power on and off. After this cleared the failed signal and all displays were reading correctly again, a manual calibration was performed. Due to this incident, the data is not valid for the CO, O2, or Stack NOx from 1:22 PM – 4:40 PM, duration of 3.3 hours. Since a quick resolution was found, it was decided not to place the Horiba's online. However, this mill is waiting on a response from the Rosemont reps for guidance to determine the root cause for the failed signal.

The Daily Emission Sheet, graph, Environmental Incident Report and Cogen Report have been provided for you to review.

If you have any questions or require additional information, please call me at 805-271-7284.

Sincerely,

Stephanie K Fella

Stephanie K. Fella
Environmental Engineer
Weyerhaeuser Company

cc: Victor Kumpera, Rudy Rehbein, Charlie Wilson, file

"Breakdown"

Weyerhaeuser
The future is growing™

5936 Perkins Rd
Oxnard CA 93033
PO Box 519
Port Hueneme CA 93044
Tel (805) 986 3881
Fax (805) 488 5186

May 17, 2007

Lyle Olson
County of Ventura
Air Pollution Control District
669 County Square Drive
Second Floor
Ventura, CA. 93003

Re: May 14 -16 CEMS breakdown

Dear Mr. Olson:

This letter is a follow up on the telephone call made by Charlie Wilson on May 14, 2007, to the VCAPCD Breakdown Center Hotline.

On May 14, 2007, the Cogen Mechanic noticed that after the auto calibration of the Rosemont CEMS complete, the values for the Stack NOx were low. The Maintenance Manager was then notified and it was determined that the Rosemont CEMS for the Stack NOx Analyzer was not reading the expected 10.5 ppm readings. The ammonia control loop was placed into manual at this time to control emissions. Once troubleshooting began, it was found there were flow issues with the Rosemont sample handling unit. The sample pump was replaced with a new one from stores, but this did not restore the flow. In the meantime, the Horiba Stack NOx and O2 were brought online. The Inlet NOx and CO remained online but the data is not valid while troubleshooting the unit. Efforts to discover the root cause continued the following day, May 15, 2007. The supplier of the sampling handling unit was contacted. Finally it was discovered that the flow restriction for the stack sample handling unit came from a filter assembly head that had carry over of ceramic filter material. This material built up and eventually plugged the outlet orifice. Once this was corrected, flows were established for the Stack NOx and O2 analyzers. The mill confirmed the Rosemont CEMS operation after completing a manual calibration of the analyzers and a sequence programmed calibration. This is first time the Mill has seen evidence of this plugging issue on the filter head since Rosemont CEMS were put online in CY 2004.

The following are the times the Rosemont and Horiba Analyzers ran for each gas monitored. Next, each gas and time is listed for when the data is not valid, due to troubleshooting and maintenance.

Rosemont Stack CO

5/14/07

- 10:05 - 10:42 - Auto Cal
- 10:42 - 23:07 - Troubleshooting
- 23:02 - 0:00 - Online

Breakdown"

Weyerhaeuser
The future is growing™

5936 Perkins Rd
Oxnard CA 93033
PO Box 519
Port Hueneme CA 93044
Tel (805) 986 3881
Fax (805) 488 5186

August 23, 2007

Lyle Olson
County of Ventura
Air Pollution Control District
669 County Square Drive
Second Floor
Ventura, CA. 93003

Re: PI Historical Data Lost

Dear Mr. Olson:

This letter is a follow up on the telephone call made by Stephanie Fella on August 21, 2007, to the VCAPCD Breakdown Center Hotline.

Around 10:30 AM on August 21, 2007, an E&I Technician noticed that the DCS Operator Stations were slow to update on the screens. The review of the PI Data showed that starting at about 10:00 AM on the PI Data Trends, there were gaps in this historical data. Then about an hour later, there is no data at all being recorded in PI. The E&I Technician continued investigating the issue and later discovered that the transceiver connecting Node 12 (for Cogen) to the PI Network malfunctioned and caused the lost connection to the IMS Station and PI. Once the transceiver for this node was replaced the connection was restored and allowed data to be recorded in PI once again. There is lost historical data due to this incident from 10:00 AM - 6:19 PM, duration 8.32 hours. All data was showing up on DCS and trends from the DCS were printed to show that the data is in compliance and no excess emissions occurred.

It does appear that there has been some data interruption since August 9, 2007. However, this did not influence the integrity of the data until August 21, 2007, when the incident was reported.

The Daily Emission Sheet, graphs, environmental incident report and Cogen Report have been provided for you to review.

If you have any questions or require additional information, please call me at the number listed above.

Sincerely,

Stephanie K. Fella

Stephanie K. Fella
Environmental Engineer
Weyerhaeuser Company

cc: Victor Kumpera, Rudy Rehbein, Charlie Wilson, file

Breakdown

Hueneme Paper Mill

Weyerhaeuser
The future is growing™

5936 Perkins Rd
Oxnard CA 93033
PO Box 519
Port Hueneme CA 93044
Tel (805) 986 3881
Fax (805) 488 5186

December 14, 2007

Lyle Olson
County of Ventura
Air Pollution Control District
669 County Square Drive
Second Floor
Ventura, CA. 93003

Re: December 13 Nebraska Start-up

Dear Mr. Olson:

This letter is a follow up on the telephone call made by Charlie Wilson on December 13, 2007, to the VCAPCD Breakdown Center Hotline.

On December 7, 2007, the Nebraska was planned to be started for maintenance, but it would not start. The issue was investigated and it was found that a Low Fire sequence micro switch was not working properly. On December 13 the E&I Staff repaired the switch and the Nebraska was started to verify the issue was resolved. The Nebraska was online from 3:04 PM to 3:28 PM, duration of 0.4 hours. A calibration was preformed prior to the start-up.

The Daily Emission Sheet, graph, Environmental Incident Report, and Cogen Report have been provided for you to review.

If you have any questions or require additional information, please call me at the number listed above.

Sincerely,

Stephanie Fella

Stephanie K. Fella
Environmental Engineer
Weyerhaeuser Company

cc: Victor Kumpera, Rudy Rehbein, Charlie Wilson, file

Breakdown

Weyerhaeuser
The future is growing™

5936 Perkins Rd
Oxnard CA 93033
PO Box 519
Port Hueneme CA 93044
Tel (805) 986 3881
Fax (805) 488 5186

January 8, 2008

Lyle Olson
County of Ventura
Air Pollution Control District
669 County Square Drive
Second Floor
Ventura, CA. 93003

Re: January 4 Nebraska Start-up

Dear Mr. Olson:

This letter is a follow up on the telephone call made by Charlie Wilson on January 4, 2008, to the VCAPCD Breakdown Center Hotline.

On January 4, 2008, the Nebraska was planned to start up in order to conduct preventative maintenance inspections on the safety low level and pressure control switches that are needed to shut off the boiler. The Nebraska was online from 1:34 PM to 2:06 PM, duration of 0.53 hours. A calibration was preformed prior to the start-up.

The Daily Emission Sheet, graph, Environmental Incident Report, and Cogen Report have been provided for you to review.

If you have any questions or require additional information, please call me at the number listed above.

Sincerely,

Stephanie K. Fella
Environmental Engineer
Weyerhaeuser Company

cc: Victor Kumpera, Rudy Rehbein, Charlie Wilson, file

Hueneme Paper Mill

Breakdown

Weyerhaeuser
The future is growing™

5936 Perkins Rd
Oxnard CA 93033
PO Box 519
Port Hueneme CA 93044
Tel (805) 986 3881
Fax (805) 488 5186

January 22, 2008

Lyle Olson
County of Ventura
Air Pollution Control District
669 County Square Drive
Second Floor
Ventura, CA. 93003

Re: January 21, 2007 CEMS Stack NOx breakdown

Dear Mr. Olson:

This letter is a follow up on the telephone call made by Charlie Wilson on January 21, 2008, to the VCAPCD Breakdown Center Hotline.

On January 21, 2008, at 13:30 the Cogen Mechanic received a HIGH ABB alarm for the Stack Corrected NOx reading values greater 15 ppm. He then noticed on the display page in the cogen cab that the Stack NOx trend had oscillating profile. The Cogen Mechanic immediately contacted an E/I Technician to troubleshoot the system. At 13:40, the E/I Technician called the Maintenance Manager and reported that there appeared to be an issue with the sample pump for Stack NOx readings. The E/I Tech was informed to replace the sample handling pump. Once replaced with a new one from stores, the flow was not restored. In the meantime, the Maintenance Manager placed the ammonia control loop into manual to control emissions. The Maintenance Mechanic and E/I Tech continued trouble shooting and decided to bypass the filter assembly, to check if this is where the flow restriction was occurring. Once this was complete, pressure was restored to the sample handling pump. This confirmed that the flow restriction was due to a plugged filter. The E/I Tech then installed the original pump and replaced the plugged filter. At this time the Stack NOx readings returned to their expected range for operating conditions. The issue began at 12:55 PM and was resolved at 3:15 PM, 2.33 hours.

The Daily Emission Sheets graph, Environmental Incident Report and Cogen Report have been provided for you to review.

If you have any questions or require additional information, please call me at the number listed above.

Sincerely,

Stephanie Fella

Stephanie K. Fella
Environmental Engineer
Weyerhaeuser Company

cc: Victor Kumpera, Rudy Rehbein, Charlie Wilson, file

Breakdowns '08

Weyerhaeuser
The future is growing™

5936 Perkins Rd
Oxnard CA 93033
PO Box 519
Port Hueneme CA 93044
Tel (805) 986 3881
Fax (805) 488 5186

January 28, 2008

Lyle Olson
County of Ventura
Air Pollution Control District
669 County Square Drive
Second Floor
Ventura, CA. 93003

Re: Cogen Plant to ISOCH January 24, 2008

Dear Mr. Olson:

This letter is a follow up on the telephone calls, which were made to the VCAPCD Breakdown Center Hotline on January 24, 2008.

On January 24, 2008, Southern California Edison opened their utility breaker which forced the mill cogeneration plant to switch from droop control to isochronous (ISOCH) control. Mill personnel heard thunder and saw lightening. Call Team members along with E/I reps were called into the mill to return the cogen plant from ISOCH to DROOP mode. But, during that time, the mill demand was for less than 2 MW and the MK V control logic opened the 52G Breaker. Therefore, a Master Reset on the MK V HMI had to be completed in order to synchronize across the 52G Breaker. Once the cogen plant was online it was returned to normal operating mode prior to the lightening strikes. This occurred from 3:36 AM – 5:18 AM, for 1.7 hours.

According to the Title V permit, this event was an unplanned load change, with the loss of power greater than 40% of the turbine rating. The turbine was back to normal operating conditions within the 2 hour limit; therefore, no excess emissions occurred.

The Daily Emission Sheets, graphs, and Cogen Reports have been provided for you to review.

If you have any questions or require additional information, please call me at the number listed above.

Sincerely,

Stephanie Fella

Stephanie K. Fella
Environmental Engineer
Weyerhaeuser Company

cc: Victor Kumpera, Rudy Rehbein, Charlie Wilson, file

Breakdown

Hueneme Paper Mill

Weyerhaeuser
The future is growing™

5936 Perkins Rd
Oxnard CA 93033
PO Box 519
Port Hueneme CA 93044
Tel (805) 986 3881
Fax (805) 488 5186

February 1, 2008

Lyle Olson
County of Ventura
Air Pollution Control District
669 County Square Drive
Second Floor
Ventura, CA. 93003

Re: January 30 Nebraska Start-up

Dear Mr. Olson:

This letter is a follow up on the telephone call made by Charlie Wilson on January 30, 2008, to the VCAPCD Breakdown Center Hotline.

On January 30, 2008, the Nebraska was planned to start up in order to conduct the required verification by Factory Mutual of 2 level safety control devices. These level safety control devices were enabled during the operation of the boiler and were working properly. The Nebraska was online from 14:42 to 15:07, duration of 0.42 hours. A calibration was performed prior to the start-up.

The Daily Emission Sheet, graph, Environmental Incident Report, and Cogen Report have been provided for you to review.

If you have any questions or require additional information, please call me at the number listed above.

Sincerely,

Stephanie Fella

Stephanie K. Fella
Environmental Engineer
Weyerhaeuser Company

cc: Victor Kumpera, Rudy Rehbein, Charlie Wilson, file

Hueneme Paper Mill

TO APCD

Weyerhaeuser
The future is growing™

5936 Perkins Rd
Oxnard CA 93033
PO Box 519
Port Hueneme CA 93044
Tel (805) 986 3881
Fax (805) 488 5186

February 27, 2008

Lyle Olson
County of Ventura
Air Pollution Control District
669 County Square Drive
Second Floor
Ventura, CA. 93003

Re: February 23, 2008, turbine CO calibration breakdown

Dear Mr. Olson:

This letter is a follow up on the telephone call made by Charlie Wilson on February 24, 2008, to the VCAPCD Breakdown Center Hotline.

On February 23, 2008, the CO analyzer, during the automatic calibration did not span. The fact was discovered the next day during the review of the emission log. The subsequent automatic calibration corrected problem. The reason for this breakdown was investigated, but it remained unresolved. The NOx and O2 calibrations were executed without fault.

The CO data from 2/23/08 11:00 a.m. to 2/24/2008 11:00 a.m. was lost.

The Daily Emission Sheet, graph, Environmental Incident Report, and Cogen Report have been provided for you to review.

If you have any questions or require additional information, please call me at the number listed above.

Sincerely,

Victor Kumpera
Technical Superintendent
Weyerhaeuser Company

cc: Victor Kumpera, Rudy Rehbein, Charlie Wilson, file

Hueneme Paper Mill

Emergency Variance File

Weyerhaeuser
The future is growing™

5936 Perkins Rd
Oxnard CA 93033
PO Box 519
Port Hueneme CA 93044
Tel (805) 986 3881
Fax (805) 488 5186

March 3, 2008

Chris Cote
County of Ventura
Air Pollution Control District
669 County Square Drive
Second Floor
Ventura, CA. 93003

Re: Emergency Variance Removal

Dear Ms. Cote:

Please find attached the Weyerhaeuser Company, Hueneme Mill preliminary test results for the Turbine Source Performance Test conducted on February 21, 2008. According to the draft results from Accurate Environmental Services, Hueneme Mill passed on its allowable limits per Title V Permit 0157 for NO_x, CO, and NH_3. The mill no longer requires to operate under the terms and conditions of the 30-day emergency variance granted on February 14, 2008 by VC APCD. The final Turbine Source Performance Test results will be submitted within the 45 day time frame. Your assistance with this issue was greatly appreciated.

If you have any questions or require additional information, please contact Stephanie Fella at 805.271.7284.

Based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate, and complete.

Sincerely,

Rudy Rehbein
Weyerhaeuser Company
Hueneme Mill

cc: V. Kumpera, Lyle Olson, VCAPCD, File

HEARING BOARD

Ventura County Air Pollution Control District

PETITION FOR EMERGENCY VARIANCE HEARING

No. _____

Name & address of applicant or agent:	Receipt Stamp

INSTRUCTIONS

1. Assistance in filling out this form and/or developing a compliance schedule can be obtained by contacting the Compliance Section at (805) 645-1400.

2. Please type or print legibly.

3. Refer to the Air Pollution Control District Rulebook, Regulation VII and Rules 112, 113 and 123, when completing this form.

4. Enclose filing fee with application. The filing fee for an **Emergency Variance** is $100. Make checks payable to Ventura County APCD.

5. Petition must be signed by the petitioner or authorized agent. When the person signing is not the petitioner, the petitioner shall set forth his authority to sign.

6. Incomplete and/or unsigned petitions cannot be accepted.

7. Submit the completed petition and filing fee to the Compliance Section at the Air Pollution Control District, 669 County Square Drive, Second Floor, Ventura, CA 93003.

8. The APCD will submit the Petition to the Clerk of the Hearing Board, Ventura County Government Center, 800 South Victoria, Ventura, California 93009.

9. A copy of this form will be returned to you, stating the date, place, and time of the hearing.

For APCD Use Only

Petition Received by:

Air Pollution Control District Representative Date

Filing Fee: $_____ Receipt No.: _____

Notice Required: _____Days Permit No.: _____

Contents of Petitions

Reference: Rule 112

The following information is required by District Rules and is necessary to allow the Hearing Board to make all findings required by state law. Please respond in detail. Use additional pages, as necessary.

A. Name, address and telephone number of petitioner or other person authorized to receive service of notices

Contact Name: Rudy Rehbein

Company Name: Weyerhaeuser Company

Address: 5936 Perkins Road, Oxnard, CA. 93033

Phone Number: 805-986-3881

Email Address: rudy.rehbein@weyerhaeuser.com

Cell Number: 805-443-8683

FAX Number: 805-986-9841

B. Name, address and telephone number of person or company who owns the equipment or source of emissions involved in this petition, if different than above.

Name: _

Company Name: _

Address: _

Phone Number: _ Email Address: _

Cell Number: _ FAX Number: _

C. The person who owns the emission source involved in the petition is (select one):

☐ Individual ☐ Co-Partnership X Corporation

☐ Public Agency ☐ Essential Public Agency ☐ Small Business (see note)

☐ Other (specify): _

Note: Small Business has the same meaning as defined by the Small Business Administration, and emits 10 tons or less per year of air contaminants. Contact District staff for further information

Names and addresses of partners or officers: _

Type of business: _ _

Street address where emission source is located: _

E. Purpose of petition:

X To request that an **emergency** variance be granted (30-days maximum)

F. In detail, describe the activity or emission source which is the subject of this petition; what is the product used for, and why it is necessary for the operation of a business?

This stationary source is a manufacturing facility that produces corrugating medium. Major equipment at the source include a natural gas-fired cogeneration turbine that provides the paper process with electricity, steam, and hot air. This stationary source is subject to the part 70 permit program based upon the potential to emit nitrogen oxides (NOx) and carbon monoxide (CO). The source operates one cogeneration unit. This unit consists of a General Electric LM-2500-PK natural gas fired turbine that drives a 29.0 MW electrical generator and a 51 MMBTU/Hr Coen

Duct Burner. The turbine is controlled by a selective catalytic reduction (SCR) and steam injection. In addition, the facility operates a continuous monitoring system (CEMS) at the turbine that continuously monitors control system operating parameters, as well as NOx and CO from the gas turbine.

G. What happened that requires you to apply for a variance?

The mill had scheduled its annual Turbine Source Compliance Test for the Rosemont CEMS along with the RATA. Upon completion of 3 – 96 minute test runs for the Source Compliance test the NOx average read by the testing company was 14.3 PPM, which is above the mill permit limit of 12 PPM. Therefore the mill is requesting a variance to allow the mill the opportunity to determine the root cause of this event and to perform a corrective action.

F. Signature of petitioner or authorized representative

Buddy Gilbert 2/13/2008

(Petitioner or Representative) (Date)

Plant Manager

(Title or Authority of Representative)

Petition for **Emergency** Variance

Reference: Rule 113

A. From what District rule(s) and section(s) is the **Emergency** Variance being sought?
Rule 26 – (Authority to Construct # 0157-160, October 7, 1997), 12.0 ppvd referenced at 15 percent volume stack gas O2 on dry basis.

B. What is the length of time that is being requested for this variance? (Maximum 30 days)

30 DAYS

C. Why would compliance with the rule(s) be unreasonable?

The root cause of the issue is not known. Further testing is needed to determine the root cause of the event. Once the root cause is determined, then the stack will be re-tested to pass its Turbine Source Compliance.

D. Describe the damage or harm that would result if immediate compliance with the rule was required. Include business closure, economic losses in dollar amounts, hardship on customers, employee layoffs, and similar matters.

The NOx set point was lowered from 11.00 PPM to 8.7 PPM. This will mitigate the and offset the test results by 2.3 ppvd to achieve 12 ppvd compliance. The root cause can only be determined while the turbine is running. The other option would be to shut down the turbine, and start the Nebraska back-up boiler resulting in greater quantities of emissions, loss of production and possible lay offs. However, shutting down the turbine would not determine the root cause of the turbine stack stratification and would be counterproductive.

E. What consideration has been given to curtailing the operations of the source in lieu of obtaining an **emergency** variance?

The problem pertains to the emissions stratification of the turbine stack. If the operation was curtailed there would be no way to determine the root cause and address the issue.

F. What efforts will be undertaken during the period of the variance to ensure excess emissions are reduced to the maximum extent feasible?

The NOx set point was lowered from 11.00 PPM to 8.7 PPM. This will offset the tested NOx average of 14.3 PPM.

G. Describe the methods of monitoring or alternative methods that will be used, if requested by the District, to quantify and report the emission levels from the source during the period the **emergency** variance is in effect.

The CEMS can be switched from the Rosemont Units to our back-up Horiba Units, if requested. The Horiba Unit probe is in the different location of the stack where the higher NOx readings were tested. The use of the Horiba units could, potentially, lower our overall average NOx. However, the same result will be achieved by lowering the NOx setpoint. It will also allow the

mill to continue troubleshoot the issue.

H. The Hearing Board is required to give public notice of variance hearings as the public has a right to attend and testify at such hearings. In order for the Hearing Board to hold an **emergency** variance hearing without the required public notice, a petitioner must present facts that will support a determination by the Board that **"good cause"** exists to hear the variance without notifying the public about the variance. What is the basis for a claim of "good cause" or why does the condition constitute a breakdown, as defined in Rule 32?

In order to address the issue quickly and ensure NOx emissions are not exceeding our permit, the source of the issue will be investigated starting 02/14/08. This way, once the Turbine Source Compliance can be re-tested, we can assure the District NOx emissions are within our permitted limit.

I. Describe the corrective measures undertaken and/or to be undertaken to correct the occurrence and to prevent it from reoccurring in the future.

At this time, the cause of the elevated NOx reading in the East side of the stack is not known. Despite that our stack stratification is very well documented and it was a source of intermittent problems in the past (CO gas), the NOx has not been a problem. This has not occurred in any previous Turbine Source Compliance Tests. A certified company will be onsite tomorrow (2/14/08) in order to conduct engineering tests and evaluations of the emissions stratification in the stack. Once the cause is known ever effort will be conducted in order to prevent its reoccurrence in the future.

J. Is the emission source involved in this petition covered by a Permit to Operate?

X Yes ☐ No Permit Number: _ 0157

K. Permitted Emissions: Pollutant pounds/hour tons/year

NOx – 85.45 pounds/hour - 50 Tons/Year

L. Estimate the maximum excess emissions in pounds per hour and prorated tons per year which would be emitted during the variance period.

Pollutant pounds/hour tons/year

The mill estimates that the lowering of the NOx set point will result in no excess emissions of NOx during the variance period.

M. Signature of petitioner or authorized representative

Gerdy Gerhard 2/13/08

(Petitioner or Representative) (Date)

Plant Manager

(Title or Authority of Representative)

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
STRMLN157-SOx	Streamline for sulfur content in fuel and SOx emission limits located in Rules 54 and 64, 40 CFR Part 60 Subpart GG.

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Facility burns PUC quality gas only. Annual source test for non-PUC quality gas, none for PUC quality gas. Gaseous fuel: SCAQMD Method 307-94; Exhaust Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD Method 307-94, as appropriate.

2. Yes — Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method is continuous or intermittent:

   Continuous – As indicated by a continuous monitoring device
   X Intermittent – As indicated by non- continuous periodic monitoring

4. No — During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5. No — During the time period covered by this compliance certification, does the monitoring data indicate any exceedences, if applicable? An *exceedence* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

6. No — During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?

7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedences, or other indication of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.

8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification

04/01/07 to 03/31/08

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment
Form TVPF46/12-24-98 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PO0157PC1 - Condition 1	Description: General Record Keeping.

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Monthly records of throughput and consumption.

2. Yes — Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method is continuous or intermittent:

   Continuous – As indicated by a continuous monitoring device
   X Intermittent – As indicated by non- continuous periodic monitoring

4. No — During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5. No — During the time period covered by this compliance certification, does the monitoring data indicate any exceedences, if applicable? An *exceedence* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

6. No — During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?

7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedences, or other indication of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.

8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification

04/01/07 to 03/31/08

MONTHLY ENVIRONMENTAL POLLUTION CALCULATIONS

DATE	GAS TURBINE			COEN DUCT BURNER			MAXON BURNER				CEMS Emissions		*12 Month Rolling Sum	
	THERMS	*SCF*	Rolling 12-month (MMcf)	THERMS	SCF	Rolling 12-month (MMcf)	THERMS	SCF	Rolling 12-month (MMcf)	NOx, tons	CO tons	NOx tons	CO tons	NOx tons
Apr-06	1,991,959	192,459,807	2302	34,100	3,294,686	32	15,841	1,530,531	23	0.071	4.95	3.94	59.5	48.4
May-06	2,082,777	201,234,493	2308	33,202	3,207,923	34	15,758	1,522,512	23	0.071	5.13	4.10	57.0	48.6
Jun-06	2,017,204	194,898,937	2314	21,297	2,057,681	34	5,731	553,720	22	0.026	4.25	3.86	55.7	48.6
Jul-06	2,057,890	198,829,952	2313	12,500	1,207,729	35	2,358	227,826	20	0.011	3.96	3.84	55.3	47.7
Aug-06	2,104,738	203,356,329	2314	8,505	821,739	35	5,253	507,536	18	0.024	3.71	3.86	55.7	47.4
Sep-06	2,033,497	196,473,140	2315	12,546	1,212,174	35	3,191	308,309	16	0.014	3.96	3.73	56.1	47.2
Oct-06	1,817,323	175,586,763	2297	43,661	4,218,454	37	1,168	112,850	14	0.005	4.97	3.55	57.4	46.6
Nov-06	1,832,518	177,054,879	2283	62,686	6,056,618	41	710	68,599	13	0.003	4.93	3.74	57.6	46.4
Dec-06	1,732,358	167,377,585	2255	46,580	4,500,483	41	5,026	485,604	12	0.023	4.48	3.65	56.8	45.9
Jan-07	1,913,613	184,890,145	2240	31,692	3,062,029	39	15,117	1,460,580	12	0.068	4.63	3.81	55.7	45.6
Feb-07	1,427,525	137,925,121	2222	16,738	1,617,198	35	1,056	102,029	9	0.005	4.08	3.42	54.4	45.5
Mar-07	1,989,501	192,222,319	2222	7,922	765,411	32	181	17,488	7	0.001	3.45	3.81	52.5	45.3
Apr-07	1,803,388	174,240,386	2204	1,591	153,720	29	2	193	5	0.000	3.09	3.52	50.6	44.9
May-07	2,023,430	195,500,483	2198	5,222	504,541	26	3	290	4	0.000	3.62	3.78	49.1	44.6
Jun-07	2,005,376	193,756,135	2197	11,046	1,067,246	25	10	966	3	0.000	3.59	3.79	48.5	44.5
Jul-07	2,070,447	200,043,188	2198	8,746	845,024	25	1110	107246	3	0.005	3.67	3.90	48.2	44.6
Aug-07	2,058,380	198,877,295	2194	10,204	985,894	25	56	5411	3	0.000	3.55	3.86	48.0	44.6
Sep-07	2,002,488	193,477,101	2191	11,579	1,118,744	25	468	45217	2	0.002	3.58	3.85	47.6	44.7
Oct-07	1,967,983	190,143,285	2206	14,326	1,384,155	22	6	580	2	0.000	3.98	3.83	46.6	45.0
Nov-07	1,888,857	182,498,261	2211	19,258	1,860,676	18	174	16812	2	0.001	3.85	3.67	45.6	44.9
Dec-07	1,949,354	188,343,382	2232	53,234	5,143,382	19	1782	172174	2	0.008	5.02	3.85	46.1	45.1
Jan-08	2,009,620	194,166,184	2241	58,717	5,673,140	21	1596	154203	1	0.007	5.20	4.01	46.7	45.3
Feb-08	1,874,722	181,132,560	2284	51,239	4,950,628	24	6484	626473	1	0.029	4.90	3.58	47.5	45.5
Mar-08	1,800,990	174,008,696	2266	44,850	4,333,333	28	9946	960966	2	0.045	4.29	3.42	48.3	45.1
Annual Actuals			2,266			28			2	0.10	48.3	45.1		
Permit Limit			2,847			854			37		97.66	50.00	97.7	50.0
Exceeds Permit Limit			NO			NO			NO		NO	NO	NO	NO

Annual Actuals and Permit Limit Therms and SCF are MMTHERMS AND

Comparison of Actual and Permitted Emissions and Throughputs

	MMcf/yr	MMcf/yr	MMcf/yr	ton/yr	ton/yr	ton/yr	ton/yr
Permit Limit	*2,847*	854.1	36.5	97.66	50	97.66	50
Actual Annual	*2,266*	28.0	2.09	48.34	45.06	rolling averages above	

DATE	GAS TURBINE SCF	DUCT BURNER SCF	MAXON BURNER SCF	Maxon NOx NOx, tons	From Stack CO tons	From Stack NOx tons	Total NOx tons
Apr-07	174,240,386	153,720	193	0.000	3.09	3.52	3.52
May-07	195,500,483	504,541	290	0.000	3.62	3.78	3.78
Jun-07	193,756,135	1,067,246	966	0.000	3.59	3.79	3.79
Jul-07	200,043,188	845,024	107,246	0.005	3.67	3.90	3.90
Aug-07	198,877,295	985,894	5,411	0.000	3.55	3.86	3.86
Sep-07	193,477,101	1,118,744	45,217	0.002	3.58	3.85	3.85
Oct-07	190,143,285	1,384,155	580	0.000	3.98	3.83	3.83
Nov-07	182,498,261	1,860,676	16,812	0.001	3.85	3.67	3.67
Dec-07	188,343,382	5,143,382	172,174	0.008	5.02	3.85	3.86
Jan-08	194,166,184	5,673,140	154,203	0.007	5.20	4.01	4.02
Feb-08	181,132,560	4,950,628	626,473	0.029	4.90	3.58	3.61
Mar-08	174,008,696	4,333,333	960,966	0.045	4.29	3.42	3.46
	2,266,186,957	28,020,483	2,090,531	0.10	48.34	45.06	45.16

GAS USAGE	PERMIT LIMIT MMCF/YR	12 MONTH ROLLING MAX MMCF	YEARLY TOTAL SCF	ESTIMATED EXCESS MMCF/YR
GAS TURBINE	2,847	2,266.19	2,266,186,957	-580.81
DUCT BURNER	854.1	28.02	28,020,483	-826.08
MAXON BURNER	36.5	2.09	2,090,531	-34.41

Max 12-month rolling NOx tons	Max CO 12-month rolling tons
45.16	48.34

PROJECTED CARBON MONOXIDE EMISSION ON AN ANNUAL BASIS= 48.34 tons

PERMITTED CARBON MONOXIDE EMISSION ON AN ANNUAL BASIS= 97.66 tons

ESTIMATED EXCESS EMISSION -49.32 tons

TURBINE PROJECTED NOx EMISSION ON AN ANNUAL BASIS= 45.06 tons

TURBINE PERMITTED NOx EMISSION ON AN ANNUAL BASIS= 50.00 tons

ESTIMATED EXCESS EMISSION -4.94 tons

MAXON PROJECTED NOx EMISSION ON AN ANNUAL BASIS= 0.10

MAXON PERMITTED NOx EMISSION ON AN ANNUAL BASIS= 1.9 tons

ESTIMATED EXCESS EMISSION -1.80 tons

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment
Form TVPF46/12-24-98 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
PO0157PC1 - Condition No. 2	Rule 26 and Rule 29 Solvent Record Keeping.

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Monthly records of solvent purchase and usage are attached.

2. Yes — Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method is continuous or intermittent:

Continuous – As indicated by a continuous monitoring device
X Intermittent – As indicated by non- continuous periodic monitoring

4. No — During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5. No — During the time period covered by this compliance certification, does the monitoring data indicate any exceedences, if applicable? An *exceedence* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

6. No — During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?

7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedences, or other indication of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.

8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification

04/01/07 to 03/31/08

PRODUCT	VOC Content (LB/Gal)	HHC Content (LB/Gallon)	ROC (LB)	HHC (LB)	Volume	APR 2007	MAY 2007	JUNE 2007	JULY 2007	AUG 2007	SEP 2007	OCT 2007	NOV 2007	DEC 2007	JAN 2008	FEB 2008	MAR 2008	TOTAL
CRC14005-Natural Degreaser	6.94	0.00																
Stock # 10333315						0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12.00	12.00
			10.39	0.00	1.50													
Power Back	0.14	0.00																
From Charlie						8.00	10.00	6.00	0.00	8.00	6.00	10.00	10.00	8.00	8.50	7.50	13.00	95.00
			13.30	0.00	95.00													
Amax Solvent Degreaser (378 GE)	6.30	0.00																
Stock # 10333316						2.00	0.00	0.00	0.00	1.00	0.00	0.00	3.00	6.00	3.00	2.00	3.00	20.00
			11.79	0.00	1.87													
Permatex 598	1.02	0.00																
Stock # 10456670						0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
			0.00	0.00	0.00													
RTV 106 Adhesive	0.35	0.00																
Stock # 10334124						0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
			0.00	0.00	0.00													
Mobil Grease XTC	0.00	0.00																
Stock #						0.00	0.00	0.00	0.00	0.00	0.00	0.00	20.00	0.00	0.00	0.00	0.00	20.00
			0.00	0.00	0.00													
Mobilgrease XHP 222	0.00	0.00																
Stock #						0.00	0.00	0.00	0.00	10.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	10.00
			0.00	0.00	0.00													
TOTALS			**35.49**	**0.00**	**98.37**													

Month	Total ROC (LB)	Total HHC (LB)	Total Volume	ROC (LB)	HHC (LB)	Volume	12-month running average ROC (LB)	12-month running average HHC (LB)	12-month running average Volume (Gal)
Apr-07	2.30	0.00	8.19	2.30	0.00	8.19	16.98	0.00	67.72
May-07	1.40	0.00	10.00	1.40	0.00	10.00	16.61	0.00	77.44
Jun-07	0.84	0.00	6.00	0.84	0.00	6.00	14.52	0.00	70.75
Jul-07	0.00	0.00	0.00	0.00	0.00	0.00	13.68	0.00	64.75
Aug-07	1.71	0.00	8.94	1.71	0.00	8.94	15.39	0.00	73.69
Sep-07	0.84	0.00	6.00	0.84	0.00	6.00	16.23	0.00	79.69
Oct-07	1.40	0.00	10.00	1.40	0.00	10.00	16.23	0.00	79.69
Nov-07	3.17	0.00	11.96	3.17	0.00	11.96	17.94	0.00	89.46
Dec-07	4.66	0.00	8.56	4.66	0	8.56	20.58	0.00	91.84
Jan-08	2.96	0.00	8.78	2.96	0.00	8.78	22.42	0.00	92.62
Feb-08	2.23	0.00	7.69	2.23	0.00	7.69	22.63	0.00	94.12
Mar-08	13.84	0.00	13.78	13.84	0.00	13.78	35.35	0.00	99.90

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
PO0157PC2 - Condition No. 1	Rule 26 Annual NOx and CO Emissions Limits for GE Turbine and Coen Duct Burner (Cogen Unit).

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Monthly calculations of NOx and CO hourly emissions from cogen unit. Hourly records of fuel consumption.

2. Yes — Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method is continuous or intermittent:

   Continuous – As indicated by a continuous monitoring device
   X Intermittent – As indicated by non- continuous periodic monitoring

4. No — During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5. No — During the time period covered by this compliance certification, does the monitoring data indicate any exceedences, if applicable? An *exceedence* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

6. No — During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?

7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedences, or other indication of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.

8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification

04/01/07 to 03/31/08

Attachment to PO0157PC2,Condition1

NOx and CO Emission Calculation per Method in STRMLN0157 NOx, CO, NH3

lb/hr = X * (hourly ppmv@15% O2) * (hourly fuel throughput)
ton/yr = X * (hourly ppmv@15% O2) * (annual fuel throughput) / 2000

where *X = (8,740 dscf/MMBtu) * ([NOx or CO] lb/lb-mole) * (20.9/(20.9-15)) * (lb-mole/387 scf) * 1E-6 * HHV*

HHV =	1,017	btu/cf	(average HHV of fuel analyses over compliance year 2000)
annual throughput =	2,266	MMcf	(from spreadsheet above)
NOx =	46	lb/lb-mole	
CO =	28	lb/lb-mole	

	X	*Concentration** *(ppmv)*	Annual Throughput (MMcf)	Emissions (lbs/hr)	Emissions (ton/yr)	Emission Limit (ton/yr)	
NOx	3.74	*10.86*	2,266	10.83	46.05	50.00	✓
CO	2.28	*33.78*	2,266	20.51	87.20	97.66	✓

* NOx and CO ppmv data from Accurate Environmental Services source test conducted 02/21/08.

Hours of Operation ***TOTAL*** 8,504.20 hr/yr

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment
Form TVPF46/12-24-98 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PO0157PC2 - Condition No. 2	Description: Rule 26 Natural Gas Only.

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Fueled by natural gas only.

2. Yes — Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method is continuous or intermittent:

   Continuous – As indicated by a continuous monitoring device
   X Intermittent – As indicated by non- continuous periodic monitoring

4. No — During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5. No — During the time period covered by this compliance certification, does the monitoring data indicate any exceedences, if applicable? An *exceedence* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

6. No — During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?

7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedences, or other indication of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.

8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification

04/01/07 to 03/31/08

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment
Form TVPF46/12-24-98 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
PO0157PC2 - Condition No. 3	Rule 26 Turbine and Boiler Simultaneous Operation.

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Annual compliance certification and records of operation of the Nebraska boiler, see 74.15N3. The Nebraska boiler did not operate while the cogen unit was operating except during start up and shut down.

2. Yes — Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method is continuous or intermittent:

   X Continuous – As indicated by a continuous monitoring device
   Intermittent – As indicated by non- continuous periodic monitoring

4. No — During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5. No — During the time period covered by this compliance certification, does the monitoring data indicate any exceedences, if applicable? An *exceedence* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

6. No — During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?

7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedences, or other indication of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.

8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification

04/01/07 to 03/31/08

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment
Form TVPF46/12-24-98 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
PO0157PC2 - Condition Nos. 4 & 5	Rule 26 NOx Emission Limits for Nebraska Boiler.

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

CEMS for fuel consumption, NOx, and O2. Daily zero and span drift checks when boiler is in operation. Strip chart recordings on file at facility.

2. Yes — Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method is continuous or intermittent:

   X Continuous – As indicated by a continuous monitoring device
   Intermittent – As indicated by non- continuous periodic monitoring

4. No — During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5. No — During the time period covered by this compliance certification, does the monitoring data indicate any exceedences, if applicable? An *exceedence* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

6. No — During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?

7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedences, or other indication of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.

8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification

04/01/07 to 03/31/08

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
PO0157PC2 - Condition Nos. 6, 7, and 8	Rule 26 Fuel Combustion Requirements for Nebraska Boiler.

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Monthly records of the reason for firing fuel oil. Records of each fuel oil delivery including date and amounts. Obtain sulfur content of fuel from supplier. Fuel sulfur content: ASTM Method D4294-83 or D2622-87. No diesel fuel was burned during the reporting period.

2. Yes — Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method is continuous or intermittent:

   Continuous – As indicated by a continuous monitoring device
   X Intermittent – As indicated by non- continuous periodic monitoring

4. No — During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5. No — During the time period covered by this compliance certification, does the monitoring data indicate any exceedences, if applicable? An *exceedence* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

6. No — During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?

7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedences, or other indication of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.

8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification

04/01/07 to 03/31/08

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
PO0157PC2 - Condition No. 9	Rule 29 Fuel Metering Requirements for Maxon Duct Burner.

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Monitor time and duration of the Maxon Burner's use, and fuel consumption. Fuel use attached to PO0157PC1 – Condition No. 1.

2. Yes — Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method is continuous or intermittent:

   X Continuous – As indicated by a continuous monitoring device
   Intermittent – As indicated by non- continuous periodic monitoring

4. No — During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5. No — During the time period covered by this compliance certification, does the monitoring data indicate any exceedences, if applicable? An *exceedence* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

6. No — During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?

7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedences, or other indication of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.

8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification

04/01/07 to 03/31/08

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment
Form TVPF46/12-24-98 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: 50	Description: Rule 50 – Opacity.

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Stack opacity routinely observed by operator. Observations on January 4, February 20 and 21, 2008, have been formally documented and are attached.

2. Yes — Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method is continuous or intermittent:

Continuous – As indicated by a continuous monitoring device
X Intermittent – As indicated by non- continuous periodic monitoring

4. No — During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5. No — During the time period covered by this compliance certification, does the monitoring data indicate any exceedences, if applicable? An *exceedence* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

6. No — During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?

7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedences, or other indication of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.

8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification

04/01/07 to 03/31/08

Stack Opacity Observation Protocol

Object:	Cogen Stack (ID number 10-AB2588 reporting)
Date of Observation:	02/21/08
Time of Observation:	1:00 PM
Fuel burned:	Natural Gas
Name of the observing person:	S. Fella
Signature	Stephanie Fella
Was Visible Emission Other Than Steam Present ?	No

Object:	Nebraska Boiler (ID number 20 -AB2588 reporting)
Date of Observation:	01/04/08
Time of Observation:	1:40 PM
Fuel burned:	Natural Gas
Name of the observing person:	S. Fella
Signature	Stephanie Fella
Was Visible Emission Other Than Steam Present ?	No

Object:	Paper Forming (ID number 30-AB2588 reporting)
Date of Observation:	02/21/08
Time of Observation:	1:00 PM
Fuel burned:	N/A
Name of the observing person:	S. Fella
Signature	Stephanie Fella
Was Visible Emission Other Than Steam Present ?	No

Object:	Paper Drying; Maxon Burner (ID number 40-AB2588 reporting)
Date of Observation:	02/20/08
Time of Observation:	1:00 PM
Fuel burned:	N/A
Name of the observing person:	S. Fella
Signature	Stephanie Fella
Was Visible Emission Other Than Steam Present ?	No

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: 52	Description: Rule 52 – Particulate Matter Concentration (Grain Loading).

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Not required based on District EPA emission factor analysis.

2. Yes — Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method is continuous or intermittent:

   Continuous – As indicated by a continuous monitoring device
   X Intermittent – As indicated by non- continuous periodic monitoring

4. No — During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5. No — During the time period covered by this compliance certification, does the monitoring data indicate any exceedences, if applicable? An *exceedence* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

6. No — During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?

7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedences, or other indication of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.

8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification

04/01/07 to 03/31/08

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
54.B.1 .	Rule 54.B.1 - Discharge of sulfur compounds calculated as sulfur dioxide (SO2) not to exceed 300 ppmv from any combustion operation.

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Follow monitoring requirements under Rule 64. Compliance with Rule 64 ensures compliance with this rule based on District analysis.

2. Yes — Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method is continuous or intermittent:

   Continuous – As indicated by a continuous monitoring device
   X Intermittent – As indicated by non- continuous periodic monitoring

4. No — During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5. No — During the time period covered by this compliance certification, does the monitoring data indicate any exceedences, if applicable? An *exceedence* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

6. No — During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?

7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedences, or other indication of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.

8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification

04/01/07 to 03/31/08

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
54.B.2	Rule 54.B.2 - Discharge of sulfur dioxide (SO2) shall not exceed an average ground or sea level concentration at any point at or beyond the property line in excess of 0.25 ppmv averaged for 1 hour, or 0.04 ppmv averaged for 24 hours.

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Compliance by use of PUC quality natural gas as discussed in VCAPCD memo dated 5/23/96. (attached)

2. Yes — Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method is continuous or intermittent:

   Continuous – As indicated by a continuous monitoring device
   X Intermittent – As indicated by non- continuous periodic monitoring

4. No — During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5. No — During the time period covered by this compliance certification, does the monitoring data indicate any exceedences, if applicable? An *exceedence* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

6. No — During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?

7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedences, or other indication of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.

8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification

04/01/07 to 03/31/08

VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT
Memorandum

TO: Karl Krause DATE: May 23, 1996

FROM: Terri Thomas

SUBJECT: Rule 54.B.2 Compliance

Per your request, I ran some screening level dispersion modeling tests to determine equipment parameters that would comply with Rule 54.B.2. Rule 54.B.2 limits ground level property line SO_2 concentrations to 0.25 ppm_v for 1 hour and 0.04 ppm_v for 24 hours.

I assume that the most common SO_2 emission source is diesel combustion in IC engines. Therefore, that was the focus of my analysis.

To determine appropriate stack parameters, I reviewed 4 source test reports for diesel ICEs prepared for AB 2588. For screening purposes, the most conservative value was chosen from the test data for each stack parameter. The following summarizes stack data from these reports:

Parameter	# tests reporting parameter value	range of values	screening value
Stack velocity	3	1,812-11,343 ft/min	1,812 ft/min 9.2 m/s
Stack diameter	3	2-6 inches	2 inches 0.05 meters
Stack temperature	4	192-785°F	192°F 362 K
Stack height	0	NA	2 meters

SO_2 emissions were based on 300 ppm_v in the stack, which is the limit in Rule 54.B.1.a. This limit cannot be exceed if the diesel fuel meets the 0.5% sulfur limit in Rule 64.B.2.

Other assumptions used in modeling were that the stack was vertical and has no raincap, and the property line was at least 100 meters from the stack.

Using the parameters and assumptions listed above, screening modeling showed that the limits in Rule 54.B.2 would not be exceeded.

Use of the minimum stack diameter, and thus, the minimum flow rate and emission rate is not the most conservative case. In order to determine the maximum emission rate that could be shown to meet the Rule under the conditions described above, modeling was performed by increasing the emissions and flow rate (to maintain the 300 ppm_v SO_2 stack concentration), but increasing the stack diameter to maintain the minimum velocity. Modeling results are summarized below.

Emission rate (g/s)	Emission rate (lb/hr) and (lb/day)	1 hour max concentration (ppm_v) (limit=0.25)	24 hour max concentration (ppm_v) (limit=0.04)
0.0145	0.12 2.76	0.04	0.01
0.029	0.23 5.52	0.06	0.03
0.058	0.46 11.04	0.11	0.04
0.116	0.92 22.08	0.17	0.07
0.232	1.84 44.15	0.23	0.05

From the above, if SO_2 emissions do not exceed 1.84 lb/hr, the 1-hour limit of Rule 54.B.2 will be met. This is equivalent to burning 26 gallons of diesel at 0.5% sulfur per hour.

If SO_2 emissions do not exceed 11.04 lb/day, the 24-hour limit of Rule 54.B.2 will be met. This is equivalent to burning 155 gallons of diesel at 0.5% sulfur per day.

If the sulfur content of the fuel is lower than 0.5%, the allowable amount of fuel would, of course, be greater.

Let me know if the above information meets your needs. If so, another scenario that is probably common is a nonvertical stack (or stack with raincap). I can develop similar information for this case if you want.

c:\word6\so2comp.doc

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
57.B	Rule 57.B - Shall not discharge into the atmosphere from any fuel burning equipment combustion contaminants exceeding at the point of discharge, of 0.1 grain per cubic foot of gas calculated to 12% of CO2 at standard conditions.

replaced by Attachment 57.1 (01/11/05) GN

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Not required based on District analysis.

2. Yes — Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method is continuous or intermittent:

   Continuous – As indicated by a continuous monitoring device
   X Intermittent – As indicated by non- continuous periodic monitoring

4. No — During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5. No — During the time period covered by this compliance certification, does the monitoring data indicate any exceedences, if applicable? An *exceedence* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

6. No — During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?

7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedences, or other indication of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.

8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification

04/01/07 to 03/31/08

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
57.1	Particulate Matter Emissions from Fuel Burning Equipment

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Compliance as discussed in VCAPCD analysis dated 12/3/97 (attached)

2. Yes — Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method is continuous or intermittent:

   X Continuous – As indicated by a continuous monitoring device
   Intermittent – As indicated by non- continuous periodic monitoring

4. No — During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5. No — During the time period covered by this compliance certification, does the monitoring data indicate any exceedences, if applicable? An *exceedence* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

6. No — During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?

7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedences, or other indication of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.

8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification
04/01/07 to 03/31/08

VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT
Memorandum

TO: Interested Parties DATE: December 3, 1997

FROM: John Harader

SUBJECT: Rule 57.B / AP-42 Emission Factor Comparison

Section B of District Rule 57, "Combustion Contaminants - Specific", limits the combustion contaminant emission concentration from any fuel burning equipment. Combustion contaminants are defined in District Rule 2 as particulate matter discharged into the atmosphere from the burning of any kind of material containing carbon in a free or combined state. The emission concentration limit is 0.1 grain per cubic foot of gas calculated to 12 percent of carbon dioxide at standard conditions (0.1 gr/scf @ 12% CO_2). This limit can be converted to a lb/MMBTU emission factor by the following equation from 40 CFR Part 60, Appendix A, Method 19:

$$E = C F_c (100/\%CO_2)(lb/7000gr)$$

E = lb/MMBTU emission factor
C = Pollutant concentration (lb/DSCF)
F_c = CO_2 F-factor
= 1430 dscf CO_2/MMBTU for liquid fuels
= 1040 dscf CO_2/MMBTU for natural gas

The pollutant concentration, C, and the $\%CO_2$ values can be wet or dry as long as they are consistent. The $\%CO_2$ of 12 may be used in the equation if the pollutant concentration has been corrected to 12% CO_2:

$$C_{@12\%CO2} = C(12/\%CO_2)$$

The Rule 57.B emission limit is a limit at 12% CO_2; therefore the emission rate equation can be written:

$$E = (0.1\ gr/scf)\ F_c\ (100/12)(lb/7000gr)$$

For Natural Gas: E = 0.12 lb PM/MMBTU
For Liquid Fuels: E = 0.17 lb PM/MMBTU

Based on EPA AP-42 emission factors and source test data, all natural gas fired or fuel oil fired boilers, process heaters, and turbines; and natural gas fired or diesel fired engines

operate below this emission factor or emission limit The particulate matter emission factors for these units are:

Natural Gas Fired Units	Rule 57.B Factor = 0.12 lb PM / MMBTU	
Boiler > 100 MMBTU/Hr	3 lb/mmcf	0 00286 lb / MMBTU
Boiler 10 - 100 MMBTU/Hr	13.7 lb/mmcf	0.0131 lb / MMBTU
Boiler < 10 MMBTU/Hr	12 lb/mmcf	0 0114 lb / MMBTU
Turbine		0.0419 lb / MMBTU
Lean Burn Engine		0 046 lb / MMBTU
Rich Burn Engine		0 0007 lb / MMBTU

Fuel Oil or Diesel Fired Units	Rule 57.B Factor = 0 17 lb PM / MMBTU	
Fuel Oil Fired Boiler	2 lb / Mgal	0.014 lb / MMBTU
Fuel Oil Fired Turbine		0 061 lb/ MMBTU
Diesel Engine > 600 HP		0.062 lb/ MMBTU

Compliance with the emission limit for diesel engines < 600 HP has been shown through the conducting of a source test on an engine within Ventura County. This source test was conducted for the purpose of generating an emission factor to be used for Air Toxic "Hot Spots" emission estimations. The measured particulate concentration for this engine was 0.1 gr/dscf at 12 percent CO_2. The engine source test was a Cummins NTA engine rated at 335 horsepower at 2100 rpm. The source test was conducted July 29, 1992.

m:\titlev\rule57.Bcomp

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment
Form TVPF46/12-24-98 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
64.B.1	No person shall burn gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet (g/Hcf) of gaseous fuel (788 ppmb), except for natural gas which is limited to 15 g/Hcf (236 ppmv), calculated as H2S at standard conditions.

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

None for PUC-quality natural gas, propane, or butane. Annual test using SCAQMD Method 307-94 if gas is other than PUC-quality propane or butane.

2. Yes — Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method is continuous or intermittent:

   Continuous – As indicated by a continuous monitoring device
   X Intermittent – As indicated by non- continuous periodic monitoring

4. No — During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5. No — During the time period covered by this compliance certification, does the monitoring data indicate any exceedences, if applicable? An *exceedence* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

6. No — During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?

7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedences, or other indication of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.

8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification

04/01/07 to 03/31/08

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment
Form TVPF46/12-24-98 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
64.B.2	Emissions from combustion of solid or liquid fuels must be less than emissions which would occur form the uncontrolled combustion of such fuels with a sulfur content of 0.5% by weight.

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Fuel supplier's certification or fuel test per each delivery. No solid or liquid fuel burned in stationary sources during compliance period.

2. Yes — Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method is continuous or intermittent:

   Continuous – As indicated by a continuous monitoring device
   X Intermittent – As indicated by non- continuous periodic monitoring

4. No — During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5. No — During the time period covered by this compliance certification, does the monitoring data indicate any exceedences, if applicable? An *exceedence* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

6. No — During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?

7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedences, or other indication of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.

8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification

04/01/07 to 03/31/08

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
68	Requirement that carbon monoxide (CO) emissions not exceed 2,000 ppmv. This rule does not apply to emissions from internal combustion engines.

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Not required based on District EPA emission factor analysis.

2. Yes — Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method is continuous or intermittent:

   Continuous – As indicated by a continuous monitoring device
   X Intermittent – As indicated by non- continuous periodic monitoring

4. No — During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5. No — During the time period covered by this compliance certification, does the monitoring data indicate any exceedences, if applicable? An *exceedence* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

6. No — During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?

7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedences, or other indication of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.

8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification

04/01/07 to 03/31/08

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
74.6	Requirements that minimize the emissions of reactive organic solvents and photochemically reactive solvents.

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Maintain current solvent information. Routine surveillance of solvent cleaning activities. Solvent testing upon request.

2. Yes — Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method is continuous or intermittent:

   Continuous – As indicated by a continuous monitoring device.
   X Intermittent – As indicated by non- continuous periodic monitoring

4. No — During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5. No — During the time period covered by this compliance certification, does the monitoring data indicate any exceedences, if applicable? An *exceedence* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

6. No — During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?

7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedences, or other indication of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.

8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification

04/01/07 to 03/31/08

QSOL™ 300 CLEANING SOLVENT
MATERIAL SAFETY DATA SHEET FOR USA AND CANADA

SECTION 1: PRODUCT AND COMPANY IDENTIFICATION

PRODUCT NAME: QSOL™ 300 CLEANING SOLVENT

SYNONYMS: Not available.

PRODUCT CODE: 6541

PRODUCT USE: Cleaning and degreasing metal parts and cleaning printing equipment. VOC (Volatile Organic Compounds) content is less than 25 grams/liter. Also see SECTION 12: Volatile Organic Compounds. If these products are used in combination with other products, refer to the Material Safety Data Sheet for those products. For use ONLY in Safety-Kleen supplied equipment. Product must never be heated in an oxygen containing environment.

This number is for emergency use only. If you desire non-emergency product information, please call a phone number listed below.

24-HOUR EMERGENCY PHONE NUMBER MEDICAL AND TRANSPORTATION (SPILL):

1-800-468-1760

SUPPLIER: Safety-Kleen Systems, Inc.
5400 Legacy Drive
Cluster II, Building 3
Plano, Texas 75024
USA
1-800-669-5740
www.Safety-Kleen.com

TECHNICAL INFORMATION: 1-800-669-5740 Press 1 then 1, then Extension 7500

MSDS FORM NUMBER: 82836 **ISSUE:** March 30, 2007

ORIGINAL ISSUE: November 29, 2001 **SUPERSEDES:** January 6, 2004

PREPARED BY: Product MSDS Coordinator **APPROVED BY:** MSDS Task Force

SECTION 2: HAZARDS IDENTIFICATION

EMERGENCY OVERVIEW

APPEARANCE
Clear and colorless liquid, odorless.

WARNING!

PHYSICAL HAZARDS
Combustible liquid and vapor.

HEALTH HAZARDS
May be harmful if inhaled.
May irritate the respiratory tract (nose, throat, and lungs), eyes, and skin.
May be harmful if swallowed.
Contains material which may cause central nervous system effects.

ENVIRONMENTAL HAZARDS
No information available for the product.

POTENTIAL HEALTH EFFECTS

INHALATION (BREATHING): *High concentrations of vapor may be harmful if inhaled. High concentrations of* vapor or mist may irritate the respiratory tract (nose, throat, and lungs). High concentrations of vapor or mist may cause nausea, vomiting, headaches, dizziness, loss of coordination, numbness, and other central nervous system effects.

EYES: May cause irritation.

SKIN: May cause irritation.

INGESTION (SWALLOWING): May be harmful if swallowed. May cause throat irritation, nausea, vomiting, and diarrhea. Breathing product into the lungs during ingestion or vomiting may cause lung injury and possible death.

MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE: Individuals with pre-existing respiratory tract (nose, throat, and lungs), central nervous system, liver, eye, and/or skin disorders may have increased susceptibility to the effects of exposure.

CHRONIC: Prolonged or repeated inhalation may cause toxic effects as noted under **INHALATION (BREATHING)**. Prolonged or repeated inhalation or swallowing by rodents showed increased liver weights when exposed to this product. When exposure stopped, liver weights returned to normal. Microscopic evaluation showed no liver damage. Prolonged or repeated eye contact may cause inflammation of the membrane lining the eyelids and covering the eyeball (conjunctivitis). Prolonged or repeated skin contact may cause drying, cracking, redness, itching, and/or swelling (dermatitis).

CANCER INFORMATION: No known carcinogenicity. For more information, see **SECTION 11: CARCINOGENICITY.**

POTENTIAL ENVIRONMENTAL EFFECTS
Not available. Also see **SECTION 12: ECOLOGICAL INFORMATION.**

SECTION 3: COMPOSITION/INFORMATION ON INGREDIENTS

CAS #	Component	Synonyms	Percent
541-02-6	Decamethylcyclopentasiloxane	N.Av.	97.5-100
69430-24-6	Cyclosilanes, dimethyl-	N.Av.	0.1-1, 1-3

SECTION 4: FIRST AID MEASURES

INHALATION (BREATHING): Remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Oxygen should only be administered by qualified personnel. Someone should stay with victim. Get medical attention if breathing difficulty persists.

EYES: If irritation or redness from exposure to vapor develops, move away from exposure into fresh air. Upon contact, immediately flush eyes with plenty of lukewarm water, holding eyelids apart, for 15 minutes. Get medical attention.

SKIN: For skin contact, wash immediately with soap and water for at least 15 minutes while removing contaminated clothing. Wash contaminated clothing before reuse. If irritation persists, get medical attention.

INGESTION (SWALLOWING): Do NOT induce vomiting. Immediately get medical attention. Call 1-800-468-1760 for additional information. If spontaneous vomiting occurs, keep head below hips to avoid breathing the product into the lungs. Never give anything by mouth to an unconscious person.

NOTE TO PHYSICIANS: Treat symptomatically and supportively. Treatment may vary with condition of victim and specifics of incident. Call 1-800-468-1760 for additional information.

SECTION 5: FIRE FIGHTING MEASURES

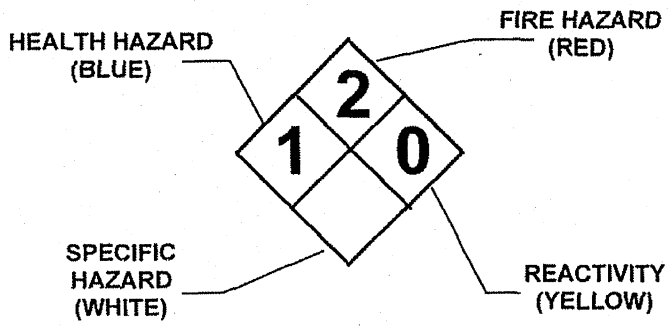
HAZARDOUS COMBUSTION PRODUCTS: Decomposition and combustion materials may be toxic. Burning may produce formaldehyde, silicon dioxide, carbon monoxide and unidentified organic compounds.

CONDITIONS OF FLAMMABILITY: Heat, sparks, or flame.

PROTECTIVE EQUIPMENT FOR FIREFIGHTERS: A positive-pressure, self-contained breathing apparatus (SCBA) and full-body protective equipment are required for fire emergencies.

EXTINGUISHING MEDIA: Carbon dioxide, regular foam, dry chemical, water spray, or water fog.

NFPA 704 HAZARD IDENTIFICATION: This information is intended solely for the use by individuals trained in this system.



FIRE FIGHTING INSTRUCTIONS: Keep storage containers cool with water spray.

FIRE AND EXPLOSION HAZARDS: Vapor explosion hazard indoors, outdoors, or in sewers. Vapors may travel to ignition source and flashback. Vapors will spread along the ground and collect in low or confined areas. Run-off to sewer may create a fire hazard. Heated containers may rupture or be thrown into the air. "Empty" containers may retain residue and can be dangerous. Product is not sensitive to mechanical impact. Product may be sensitive to static discharge, which could result in fire or explosion.

SECTION 6: ACCIDENTAL RELEASE MEASURES

Remove all ignition sources. Do not touch or walk through spilled product. Stop leak if you can do it without risk. Wear protective equipment and provide engineering controls as specified in **SECTION 8: EXPOSURE CONTROLS/PERSONAL PROTECTION**. Isolate hazard area. Keep unnecessary and unprotected personnel from entering. Ventilate area and avoid breathing vapor or mist. A vapor suppressing foam may be used to reduce vapors. Contain spill away from surface water and sewers. Contain spill as a liquid for possible recovery, or sorb with compatible sorbent material and shovel with a clean, sparkproof tool into a sealable container for disposal.

Additionally, for large spills: Water spray may reduce vapor, but may not prevent ignition in closed spaces. Dike far ahead of liquid spill for collection and later disposal.

SECTION 7: HANDLING AND STORAGE

HANDLING: Keep away from heat, sparks, or flame. Where flammable mixtures may be present, equipment safe for such locations should be used. Use clean, sparkproof tools and explosion-proof equipment. When transferring product, metal containers, including trucks and tank cars, should be grounded and bonded. Do not breathe vapor or mist. Use in a well ventilated area. Avoid contact with eyes, skin, clothing, and shoes. Do not smoke while using this product.

SHIPPING AND STORING: Keep container tightly closed when not in use and during transport. Store containers below 85°F (30°C). Store containers in a cool, dry place. Do not pressurize, cut, weld, braze, solder, drill, or grind containers. Keep containers away from heat, flame, sparks, static electricity, or other sources of ignition. Empty product containers may retain product residue and can be dangerous.

See **SECTION 14: TRANSPORTATION INFORMATION** for Packing Group information.

SECTION 8: EXPOSURE CONTROLS/PERSONAL PROTECTION

EXPOSURE GUIDELINES:

Component Exposure Limits

ACGIH, OSHA, and NIOSH have not developed exposure limits for any of this product's components.

ENGINEERING CONTROLS: Provide general ventilation needed to maintain concentration of vapor or mist below applicable exposure limits. Where adequate general ventilation is unavailable, use process enclosures, local exhaust ventilation, or other *engineering controls to control airborne* levels below applicable exposure limits. Where explosive mixtures may be present, equipment safe for such locations should be used. Vapor concentrations should be monitored and controlled in accordance with 29 CFR 1910.1048.

PERSONAL PROTECTIVE EQUIPMENT

RESPIRATORY PROTECTION: Use NIOSH-certified P- or R- series particulate filter and organic vapor cartridges when concentration of vapor or mist exceeds applicable exposure limits. Protection provided by air purifying respirators is limited. Do not use N-rated respirators. Selection and use of respiratory protective equipment should be in accordance in the USA with OSHA General Industry Standard 29 CFR 1910.134; or in Canada with CSA Standard Z94.4.

EYE PROTECTION: Wearing chemical goggles is recommended. Contact lens use is not recommended without eye protection.

SKIN PROTECTION: Where skin contact is likely, wear chemical impervious protective gloves; *use of natural rubber (latex) or equivalent gloves is not recommended.*

To avoid prolonged or repeated contact with product where spills and splashes are likely, wear appropriate chemical-resistant faceshield, boots, apron, whole body suits or other protective clothing.

PERSONAL HYGIENE: Use good personal hygiene. Wash thoroughly with soap and water after handling product and before eating, drinking, or using tobacco products. Clean affected clothing, shoes, and protective equipment before reuse. Discard affected clothing, shoes, and/or protective equipment if they cannot be thoroughly cleaned. Discard leather articles, such as shoes, saturated with this product.

OTHER PROTECTIVE EQUIPMENT: Where spills and splashes are likely, facilities storing or using this product should be equipped with an emergency eyewash and shower, both equipped with clean water, in the immediate work area.

SECTION 9: PHYSICAL AND CHEMICAL PROPERTIES

PHYSICAL STATE, APPEARANCE, AND ODOR:	Clear and colorless liquid, odorless.
ODOR THRESHOLD:	Not available.
MOLECULAR WEIGHT:	370.8
SPECIFIC GRAVITY:	0.95 (water = 1)
DENSITY:	7.9 LB/US gal (950 g/l)
VAPOR DENSITY:	Not available
VAPOR PRESSURE:	1.3 mm Hg @ 68°F (°C) (approximately) 3.1 mm Hg @ 100°F (°C) (approximately)
VOC VAPOR PRESSURE:	<1 mm Hg @ 68°F (°C) (approximately)
BOILING POINT:	410°F (210°C)
FREEZING/MELTING POINT:	-36°F (-38°C) (approximately)
pH:	Not applicable
EVAPORATION RATE:	less than 1 (butyl acetate = 1)
SOLUBILITY IN WATER:	Insoluble
FLASH POINT:	170°F (77°C) Closed Cup (approximate)
FLAMMABLE LIMITS IN AIR:	**LOWER:** Not available **UPPER:** Not available
AUTOIGNITION TEMPERATURE:	Not available
% VOLATILE:	0 WT%; 0 LB/US gal; 0 g/l As per 40 CFR Part 51.100(s). This product has been certified as a Clean Air Solvent, having passed a chemical analysis performed by California's South Coast Air Quality Management District (SCAQMD) Laboratory. It complies with the VOC (Volatile Organic Compounds) requirement of Rule 1171 - Solvent Cleaning Operations.

SECTION 10: STABILITY AND REACTIVITY

STABILITY:	Stable under normal temperatures and pressures.
CONDITIONS TO AVOID:	Avoid heat, sparks, or flame. Avoid contact with incompatible materials.
INCOMPATIBILITY:	Avoid oxidizing agents.
REACTIVITY:	Polymerization is not known to occur under normal temperature and pressures. Not reactive with water.
HAZARDOUS DECOMPOSITION PRODUCTS:	None under normal temperatures and pressures. See also **SECTION 5: HAZARDOUS COMBUSTION PRODUCTS.**

SECTION 11: TOXICOLOGICAL INFORMATION

TOXICITY DATA:

Component Analysis - LD50/LC50

Decamethylcyclopentasiloxane (541-02-6)
Oral LD50 Rat: >64 mL/kg;
Dermal LD50 Rabbit: >16 mL/kg

Cyclosilanes, dimethyl- (69430-24-6)
Oral LD50 Rat: >16 mL/kg;
Dermal LD50 Rabbit: >16 mL/kg

ACUTE EFFECTS: May irritate the respiratory tract (nose, throat, and lungs), eyes, and skin. High concentrations of vapor may be harmful if inhaled. High concentrations of vapor or mist may irritate the respiratory tract (nose, throat, and lungs). This product contains a siloxane compound which may generate formaldehyde vapors when exposed to temperatures exceeding 302°F in the presence of air. Formaldehyde is a known cancer hazard, causes irritation and sensitization of the respiratory system, causes throat irritation and is acutely toxic.

REPEATED DOSE EFFECTS: Based on best current information, there is no known human sensitization associated with this product.

Based on best current information, there is no known mutagenicity associated with this product.

Based on best current information, there is no known reproductive toxicity associated with this product.

Based on best current information, there is no known teratogenicity associated with this product.

CARCINOGENICITY:

Based on best current information, there is no known carcinogenicity as categorized by ACGIH A1 or A2 substances; as categorized by IARC Group 1, Group 2A, or Group 2B agents; or as listed by NTP as either known carcinogens or substances for which there is limited evidence of carcinogenicity in humans or sufficient evidence of carcinogenicity in experimental animals.

This product contains a siloxane compound which may generate formaldehyde vapors when exposed to temperatures exceeding 302°F in the presence of air. *Formaldehyde is a known cancer hazard.*

TARGET ORGAN EFFECTS:

Prolonged or repeated inhalation or swallowing by rodents showed increased liver weights when exposed to this product. When exposure stopped, liver weights returned to normal. Microscopic evaluation showed no liver damage. Prolonged or repeated eye contact may cause inflammation of the membrane lining the eyelids and covering the eyeball (conjunctivitis). Prolonged or repeated skin contact may cause drying, cracking, redness, itching, and/or swelling (dermatitis).

SECTION 12: ECOLOGICAL INFORMATION

ECOTOXICITY:

Not available.
Component Analysis - Ecotoxicity - Aquatic Toxicity
Not available.

PERSISTENCE/DEGRADABILITY:

This product is not expected to persist in the environment.

BIOACCUMULATION/ACCUMULATION:

Product is not expected to bioaccumulate.

MOBILITY IN ENVIRONMENTAL MEDIA:	Product is expected to have high mobility in water and soil.
OTHER ADVERSE EFFECTS:	Not available. Also see **SECTION 12: ECOLOGICAL INFORMATION**.
OCTANOL/WATER PARTITION COEFFICIENT:	Not available
VOLATILE ORGANIC COMPOUNDS:	0 WT%; 0 LB/US gal; 0 g/l As per 40 CFR Part 51.100(s). **VOC Vapor Pressure:** <1 mm Hg @ 68°F This product has been certified as a Clean Air Solvent, having passed a chemical analysis performed by California's South Coast Air Quality Management District (SCAQMD) Laboratory. It complies with the VOC (Volatile Organic Compounds) requirement of Rule 1171 - Solvent Cleaning Operations. This product complies with the VOC requirements of the BAAQMD Regulation 8, Rule 16.

SECTION 13: DISPOSAL CONSIDERATIONS

DISPOSAL:	Dispose in accordance with federal, state, provincial, and local regulations. Regulations may also apply to empty containers. The responsibility for proper waste disposal lies with the owner of the waste. Contact Safety-Kleen regarding proper recycling or disposal.
USEPA WASTE CODE(S):	This product, if discarded, is not expected to be a characteristic or listed hazardous waste. Processing, use, or contamination by the user may change the waste code(s) applicable to the disposal of this product.

SECTION 14: TRANSPORT INFORMATION

DOT:	**Shipping Name:** Combustible liquid, n o.s (Contains: Decamethylcyclopentasiloxane) **UN/NA #:** NA1993 **Hazard Class:** Combustible liquid **Packing Group:** III **Labels(s):** None
TDG:	**Shipping Name:** Not regulated
EMERGENCY RESPONSE GUIDE NUMBER:	128 Reference *North American Emergency Response Guidebook*

SECTION 15: REGULATORY INFORMATION

USA REGULATIONS

SARA SECTIONS 302 AND 304: Based on the ingredients listed in **SECTION 2**, this product does not contain any "extremely hazardous substances" listed pursuant to Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA) *Section 302 or Section 304 as identified in* 40 CFR Part 355, Appendix A and B.

SARA SECTIONS 311 AND 312: This product poses the *following health hazards as defined in* 40 CFR Part 370 and is subject to the requirements of sections 311 and 312 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA):

Immediate (Acute) Health Hazard
Delayed (Chronic) Health Hazard
Fire Hazard

SARA SECTION 313: This product does not contain "toxic" chemicals subject to the requirements of section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA) and 40 CFR Part 372.

CERCLA: Based on the ingredients listed in **SECTION 2**, this product does not contain any "hazardous substances" listed pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) in 40 CFR Part 302, Table 302.4.

TSCA: *All the components of this product are* listed on, or are automatically included as "naturally occurring chemical substances" on, or are exempted from the requirement to be listed on, the TSCA Inventory.

CALIFORNIA: This product does not contain detectable amounts of any chemical known to the State of California to cause cancer.

This product does not contain detectable amounts of any chemical known to the State of California to cause birth defects or other reproductive harm.

CANADIAN REGULATIONS
This product has been classified in accordance with the hazard criteria of the Controlled Products Regulations (CPR) and the MSDS contains all information required by the CPR.

CANADIAN ENVIRONMENTAL PROTECTION ACT (CEPA):	All the components of this product are listed on, or are automatically included as "substance occurring in nature" on, or are exempted from the requirements to be listed on, the Canadian Domestic Substances List (DSL).

SECTION 16. OTHER INFORMATION

REVISION INFORMATION:	Regulatory update, updated to ANSI Z400.1-2004 format. This MSDS has been revised in the following sections: Section 1 (Dates), Section 2 (Composition updated), Section 3 (switched to Emergency Overview, addition of information), Section 4 (Phone Numbers), Section 5 (Fire Fields), Section 8 (Exposure Limits added), Section 11 (Toxicology fields updated), Section 12 (Ecotoxicity Information, fields updated), Section 16 (Revision Information).
LABEL/OTHER INFORMATION:	This product has been certified as a Clean Air Solvent, having passed a chemical analysis performed by California's South Coast Air Quality Management District (SCAQMD) Laboratory. It complies with the VOC (Volatile Organic Compounds) requirement of Rule 1171 - Solvent Cleaning Operations.

User assumes all risks incident to the use of this (these) product(s) To the best of our knowledge, the information contained herein is accurate However, Safety-Kleen assumes no liability whatsoever for the accuracy or completeness of the information contained herein No representations or warranties, either express or implied, or merchantability, fitness for a particular purpose or of any other nature are made hereunder with respect to information or the product to which information refers The data contained on this sheet apply to the product(s) as supplied to the user

©2007 Printed in the USA

MATERIAL SAFETY DATA SHEET

Amax Industrial Products
369-13 East Main Street
East Islip, NY 11730

GENERAL INFORMATION NUMBER: 631-277-6159

REVISION DATE: September 23, 2002
DATE OF ISSUE: February 5, 2003

I - Product Identification

Amax Solvent Cleaner/Degreaser 378 GE

PRODUCT CODE: 0381
CHEMICAL FORMULATION: Citrus based degreaser.
NFPA HAZARD IDENTIFICATION SYSTEM: HEALTH: 1 FLAMMABILITY: 2 REACTIVITY: 0
HAZARD RATING: 4 - Extreme; 3 - High; 2 - Moderate; 1 - Slight; 0 - Insignificant

II - Hazardous Ingredients

Values reported as TWA unless noted

SUBSTANCE	APPROX %	OSHA PEL	ACGIH TLV	EPA 40 CFR: 302	355	372	CAS #
d-Limonene	> 90.0	N/E	N/E	Y	N	N	5989-27-5

Key: PEL: Permissible Exposure Limit TLV: Threshold Limit Value C: Ceiling level STEL: Short Term Exposure Limit
N/A: Not Applicable N/D: Not Determined N/E: Not Established Y: Yes N: No
302: CERCLA List of Hazardous Substances and Reportable Quantities (40 CFR 302.4).
355: SARA TITLE III / List of Extremely Hazardous Substances for Emergency Planning and Notification (40 CFR 355).
372: SARA TITLE III / List of Toxic Chemicals subject to Release Reporting (Community Right to Know) (40 CFR 372)

III - Physical Data

BOILING POINT (°F): 310-332
VAPOR PRESSURE (mm Hg): 2.0
VAPOR DENSITY (AIR = 1): N/D
SOLUBILITY IN WATER: Insoluble
SPECIFIC GRAVITY (WATER = 1): 0.841-0.846
VOC CONTENT (% by weight): > 90.0
EVAPORATION RATE (WATER = 1): > 1.0
pH: N/A
APPEARANCE AND ODOR: Clear, reddish-orange liquid; citrus odor.

IV - Fire and Explosion Hazard Data

FLASH POINT (°F): 122 (TEST METHOD): Closed cup
FLAMMABLE LIMITS IN AIR (VOLUME %) UPPER: 0.7 LOWER: 0.1
EXTINGUISHING MEDIA: Foam, carbon dioxide, dry chemical.
SPECIAL FIRE FIGHTING PROCEDURES: Firefighters should be equipped with full protective gear including self-contained breathing apparatus.
UNUSUAL FIRE AND EXPLOSION HAZARD: Use water spray to cool fire-exposed containers. Solvent vapors may cause flashbacks. Guard against spontaneous combustion of improperly disposed oily rags.

PRODUCT NAME: Amex Solvent Cleaner/Degreaser 378 GE PRODUCT CODE: 0381

V - Reactivity Data

STABILITY: Stable
INCOMPATIBILITY: Strong oxidizing and acidic agents, peroxides, halogens, vinyl chlorides, and iodine pentafluoride
CONDITIONS TO AVOID: Heat, sparks or open flame.
HAZARDOUS DECOMPOSITION PRODUCTS: Thermal decomposition may yield oxides of carbon
HAZARDOUS POLYMERIZATION: Will not occur
CONDITIONS TO AVOID: None

VI - Health Hazard Data

ROUTES OF ENTRY: INHALATION: EYE CONTACT: X SKIN CONTACT: X INGESTION: X
INGREDIENTS THAT ARE CONSIDERED BY OSHA, NTP, IARC TO BE SUSPECTED HUMAN CARCINOGENS: None
EFFECTS OF OVEREXPOSURE
IF IN EYES: Moderate to severe irritation, redness and possible tearing.
IF ON SKIN: Irritation, chapping and dermatitis with prolonged or repeated exposure. Contains a possible sensitizer.
IF SWALLOWED: Nausea, cramps, diarrhea. Small amounts of this product aspirated into the respiratory system during ingestion or vomiting may cause mild to severe pulmonary injury, possibly progressing to death
IF INHALED: Irritation of the respiratory tract, coughing and headache
EMERGENCY AND FIRST AID PROCEDURES
IF IN EYES: Flush eyes and under eyelids with plenty of cool water for at least 15 minutes. If irritation persists, obtain medical attention.
IF ON SKIN: Remove contaminated clothing and launder separately before re-use. Wash with soap and water. If irritation persists, obtain medical attention.
IF SWALLOWED: Call a physician or poison control center immediately. Do not induce vomiting. Rinse mouth with water, then drink one glass of water. Never give anything by mouth to an unconscious person.
IF INHALED: Remove person to fresh air. If irritation persists, obtain medical attention.

VII - Spill or Leak Protection

STEPS TO BE TAKEN IF MATERIAL IS RELEASED OR SPILLED: Ventilate area and remove all sources of ignition. Contain spill. Soak up spilled material with inert absorbent material and place in a properly marked closed container for proper disposal
WASTE DISPOSAL METHOD: Consult local environmental authorities.

VIII - Special Protection Information

RESPIRATORY PROTECTION: Use with adequate ventilation.
VENTILATION LOCAL: Recommended MECHANICAL: Not required
PROTECTIVE GLOVES: Chemical resistant gloves.
EYE PROTECTION: Safety glasses or chemical goggles.
OTHER PROTECTIVE EQUIPMENT: Protective clothing, eye wash and shower station
PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE: Store in a cool, dry place, away from heat or open flame. Keep container tightly closed when not in use.
OTHER PRECAUTIONS: Keep out of reach of children. Do not cut or weld on empty containers as they may contain combustible residue.

IX - Transportation Information (ground transportation only)

DOT PROPER SHIPPING NAME: None
DOT CLASS: None **DOT ID NUMBER:** None **DOT PACKING GROUP:** None

The shipping information listed above applies only to non-bulk (< 119 gallons) containers of this product. This product may have more than one proper shipping name depending on packaging, product properties, & mode of shipment. If any alteration of packaging, product or mode of transportation is further intended, different shipping names and labeling may apply

REVISION DATE: September 23, 2002 Prepared by: PMR DATE OF ISSUE: February 5, 2003

This information contained herein is based on data considered accurate. However, no warranty is expressed or implied regarding the accuracy of this data or the results to be obtained from the use thereof. Amex Industrial Products assumes no responsibility for personal injury or property damage to the vendee, users or third parties caused by the material. Such vendees or users assume all risks associated with the use of this material.

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: 74.11.1	Description: Large Water Heaters and Small Boilers

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Facility has not installed any water heater, boiler, steam generator or process heater with a rated heat input capacity greater than 75,000 BTU/hr and less than or equal to 2 MMBTU/hr since December 31, 1999.

2. Yes — Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method is continuous or intermittent:

   X Continuous – As indicated by a continuous monitoring device
   Intermittent – As indicated by non- continuous periodic monitoring

4. No — During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5. No — During the time period covered by this compliance certification, does the monitoring data indicate any exceedences, if applicable? An *exceedence* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

6. No — During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?

7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedences, or other indication of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.

8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification
04/01/07 to 03/31/08

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
74.22	Natural Gas-Fired, Fan-Type Central Furnaces.

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Maintain furnace identification. Rule only applies to future installation of natural gas-fired, fan-type furnaces.

2. Yes — Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method is continuous or intermittent:

   Continuous – As indicated by a continuous monitoring device
   X Intermittent – As indicated by non- continuous periodic monitoring

4. No — During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5. No — During the time period covered by this compliance certification, does the monitoring data indicate any exceedences, if applicable? An *exceedence* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

6. No — During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?

7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedences, or other indication of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.

8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification

04/01/07 to 03/31/08

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: 74.1	Description: Short-Term Activity – Abrasive Blasting.

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Routine surveillance and visual inspections. CD Lyon Construction, Inc. (PTO 07141) performs abrasive blasting and architectural coating at the Mill.

2. Yes — Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method is continuous or intermittent:

   Continuous – As indicated by a continuous monitoring device
   X Intermittent – As indicated by non- continuous periodic monitoring

4. No — During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5. No — During the time period covered by this compliance certification, does the monitoring data indicate any exceedences, if applicable? An *exceedence* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

6. No — During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?

7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedences, or other indication of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.

8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification

04/01/07 to 03/31/08

Ventura County
Air Pollution
Control District

669 County Square Drive
Ventura, California 93003

tel 805/645-1400
fax 805/645-1444
www.vcapcd.org

Michael Villegas
Air Pollution Control Officer

PERMIT TO OPERATE
Number 07141

Valid October 1, 2007 to September 30, 2008

This Permit Has Been Issued To The Following:

Company Name / Address:

C.D. Lyon Construction Inc.
P.O. Box 1456
Ventura, CA 93002-1456

Facility Name / Address:

C.D. Lyon Construction Inc.
Portable Blasting & Painting
Ventura County, CA

Permission Is Hereby Granted To Operate The Following:

Abrasive Blasting Operation

Architectural Surface Coating Operation

Portable Engines

1 - 80 BHP John Deere Diesel Engine, Model 4239

This Permit Has Been Issued Subject To The Following Conditions:

1. Permitted Emissions

	Tons/Year	Pounds/Hour
Reactive Organics	2.19	2.26
Nitrogen Oxides	0.56	2.63
Particulate Matter	5.66	39.19
Sulfur Oxides	0.01	0.04
Carbon Monoxide	0.12	0.57

2. Annual abrasive usage shall not exceed 144 tons while operating in Ventura County.

   In order to comply with this condition, permittee shall maintain daily records and monthly reports of abrasive usage. Monthly usage shall be totaled and the monthly totals summed for the previous twelve (12) months. Material usage totals for any of these twelve (12) month periods in excess of the above limits shall be considered a violation of this condition. Prior to exceeding the above limit, permittee shall submit an application to modify this condition.

3. Annual fuel consumption in Ventura County for the engine shall not exceed 2,400 gallons of diesel fuel per year.

   In order to comply with this condition, the permittee shall maintain daily and/or site specific records of diesel fuel consumption in Ventura County. These records shall be compiled

into a monthly summary. The monthly fuel records shall be summed for the previous 12 months. Diesel fuel consumption totals for any of these 12 month periods in excess of the specified limit shall be considered a violation of this condition.

Before exceeding this limit, permittee shall submit an application to modify this condition.

4. Annual usage shall not exceed 648 Gal/Yr of coatings with Maximum 3.51 Lbs/Gal ROC, as applied and 288 Gal/Yr of coatings application equipment cleanup material with Maximum 7.09 Lbs/Gal ROC, as applied, while operating in Ventura County.

   In order to comply with this condition, permittee shall maintain daily records and monthly reports of coatings, surface preparation materials, and coatings application equipment cleanup materials. Monthly usage shall be totaled and the monthly totals summed for the previous twelve months. Material usage totals for any of these twelve (12) month periods in excess of the above limit shall be considered a violation of this condition. Prior to exceeding the above limit, permittee shall submit an application to modify this condition.

5. Pursuant to APCD Rule 74.6.B.1, the permittee shall not use any material with an ROC content in excess of 25 grams per liter of material for substrate surface preparation.

6. This permit authorizes abrasive blasting and/or painting of stationary structures and their appurtenances at their permanent sites only.

7. The compressor engine(s) is for portable sandblasting and painting use only. Any request to use the engine for other purposes shall be considered a modification, and shall be subject to APCD Rule 26.

8. The portable diesel engine(s) shall comply with all applicable requirements of the California Air Resources Board's "Airborne Toxic Control Measure For Diesel Particulate Matter From Portable Engines Rated At 50 Horsepower And Greater." This regulation requires, starting January 1, 2010, that all portable in-use diesel-fueled engines shall be certified to meet a federal or California standard for newly manufactured nonroad engines pursuant to 40 CFR Part 89 or Title 13 of the California Code of Regulations (that is, certified to Tier 1, 2, or 3 nonroad engine standards).

9. Pursuant to Section 93116.3(a) of the ATCM for Diesel Particulate Matter from Portable Engines Rated at 50 HP and Greater, only CARB diesel fuel, a verified alternative diesel fuel, or CARB diesel fuel with verified additives shall be used.

10. The reactive organic compound content of the general architectural coatings used shall not exceed 250 grams per liter (2.08 pounds per gallon), computed on a minus water, minus exempt solvent basis as

applied. The reactive organic compound content of the industrial maintenance coatings used shall not exceed 420 grams per liter (3.50 pounds per gallon), computed on a minus water, minus exempt solvent basis as applied. Thinning of the coatings shall not cause the coatings to exceed their applicable standard. All coatings used must comply with APCD Rule 74.2, Architectural Coatings.

11. All ROC containing materials, used or unused, including but not limited to surface coatings, surface preparation materials and cleanup materials shall be stored in closed containers. This condition is applied as Best Available Control Technology (BACT).

12. All abrasive blasting activities shall be conducted in conformance with all applicable provisions of Title 17, California Administrative Code, Subchapter 6 (Abrasive Blasting) and APCD Rule 74.1 (Abrasive Blasting). This includes, but is not limited to, the following permit conditions.

13. Pursuant to Rule 74.1.B.1.a, all abrasive blasting operations shall be conducted within a permanent building except when steel or iron grit/shot is used exclusively, or when the item to be blasted exceeds eight feet in any dimension, or when the surface being blasted is situated at its permanent location or no further away from its permanent location than is necessary to allow the surface to be blasted.

14. Pursuant to APCD Rule 74.1.B.1.c, when the item to be blasted exceeds eight feet in any dimension, or when the surface to be blasted is situated at its permanent location or no further away from its permanent location than is necessary to allow the surface to be blasted, the abrasive blasting operation shall be conducted using wet abrasive blasting, hydroblasting, vacuum blasting or dry blasting with certified abrasives.

15. The discharge into the atmosphere from abrasive blasting operations conducted outside a permanent building shall not be as dark or darker in shade than No. 2 on the Ringlemann Chart or of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described as Ringlemann No. 2. (Note: Ringlemann No. 2 is equivalent to 40% opacity), as required by APCD Rule 74.1.C.1.a.

16. The discharge into the atmosphere from abrasive blasting operations conducted within a permanent building shall not be as dark or darker in shade than No. 1 on the Ringlemann Chart or of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described as Ringlemann No. 1. (Note: Ringlemann No. 1 is equivalent to 20% opacity), as required by APCD Rule 74.1.C.1.b.

17. The permittee shall employ reasonable methods to insure that discharge from the abrasive blasting and/or surface coating work area does not cause a nuisance, pursuant to California Health &

Safety Code Section 41700 and APCD Rule 51 (Nuisance). Such methods may include, but are not limited to, use of shrouding and covering of objects adjacent to the blasting and/or surface coating activity.

18. Pursuant to APCD Rule 74.1.B.4, only abrasives certified in accordance with Section 92350 of the California Code of Regulations shall be used for permissible outdoor blasting. Packages or containers for certified abrasives shall be legibly and permanently labeled with each of the following:

    A) The manufacturer's name or identification trade name;

    B) The grade, weight proportion of components in abrasive blends, brand name of the abrasive, or brand names and grades of components of abrasive blends; and

    C) The statement "ARB certified for permissible dry outdoor blasting."

19. The District shall be notified at least 48 hours prior to conducting abrasive blasting and/or surface coating operations by leaving a message on the District 24-hour message recorder at (805)654-2797 or by faxing a notification to (805)645-1444.

    The notification shall include the following information:

    a) Identification of operator and the Permit to Operate number (No. 7141).

    b) The location (street address and city) and a description of the abrasive blasting and/or surface coating activity.

    c) The expected starting date and duration of the abrasive blasting and/or surface coating activity.

20. The permittee shall record and maintain the following information on each abrasive blasting operation performed in Ventura County. The records shall be compiled into a monthly report. These records shall be maintained for the previous two years and shall be made available to APCD personnel upon request:

    A) The location and a description of the abrasive blasting activities.

    B) The starting and ending dates.

    C) The total hours of actual abrasive blasting activity and the amount of abrasives used.

21. The permittee shall record and maintain the following information on each surface coating operation performed in Ventura County. The records shall be compiled into a monthly report. These records

shall be maintained for the previous two years and shall be made available to APCD personnel upon request:

A) The location and a description of the surface coating activities

B) The starting and ending dates

C) On a daily or per site basis, record usage as follows: the brand name and product or number for each coating, solvent and thinner used; the mix ratio of the components used; the quantity of each material used; the ROC content of the coatings, as applied, computed on a minus water, minus exempt solvent basis; the coating category (e.g., coating, solvent, thinner, etc.); and the method of application.

D) On a daily or per site basis, record usage of spray equipment cleanup solvent used, which includes the following: brand and product name or number of each solvent; the quantity of each solvent used; the ROC content; and the method of application.

If purchase records are used to determine the amount of solvents used, then records and manifest of the amounts of solvents disposed of or sent to a recycler must also be maintained.

22. Portable abrasive blasting and surface coating equipment may be used anywhere in Ventura County.

23. Wipe cleaning operations shall comply with all applicable provisions of APCD Rule 74.6, "Surface Cleaning and Degreasing", including, but not limited to, the following material requirements:

Any materials used for cleanup, including cleanup of application equipment, shall have an ROC composite partial pessure no greater than 33 mm Hg at 20 degrees Celsius and shall have an ROC content no greater than 900 grams per liter of material (Rule 74.6.B.1).

Cleanup is defined as the removal of uncured coating, adhesive or ink from any surface, including coating application equipment, oversprayed surface, and hands. Application equipment includes but is not limited to, spray guns, rollers, and brushes.

This condition does not apply to cleaning activities using Clean Air Solvent, or a solvent with an ROC-content no more than 25 grams per liter as applied (Rule 74.6.E.1.a).

24. Wipe cleaning operations shall comply with all applicable provisions of APCD Rule 74.6, "Surface Cleaning and Degreasing". Accordingly, no person shall perform solvent cleaning unless one of the following cleaning devices or methods is used (Rule 74.6.B.2):

a) Wipe cleaning where solvent is dispensed to wipe cleaning materials from containers that are kept closed to prevent

evaporation, except while dispensing solvent or replenishing the solvent supply;

b) Application of solvent from a hand-held spray bottle, squirt bottle or other closed container with a capacity of one liter or less;

c) Non-atomized solvent flow, dip or flush method where pooling is prevented or drained, and all solvent runoff is collected in a manner that enables solvent recovery or disposal. The collection system shall be kept closed to prevent evaporation except while collecting solvent runoff or emptying the collection system.

If the cleaning method has a solvent capacity more than one gallon, a cold cleaner or remote reservoir cold cleaner meeting the equipment and operation requirements of Rule 74.6 Sections C and D shall be used.

d) A properly used enclosed gun washer or low emission spray gun cleaner.

No person shall allow liquid cleaning solvent to leak from any equipment or container (Rule 74.6.B.3).

25. All ROC-containing solvents shall be stored in non-absorbent, non-leaking containers which shall be kept closed at all times except when filling or emptying (Rule 74.6.B.4.a).

Waste solvent and waste solvent residues shall be disposed of in a manner conforming with Division 20, Chapter 6.5 of the California Health and Safety Code (Rule 74.6.B.4.b).

26. Permittee shall maintain a current material list for at least two (2) years from the date of each record showing each ROC containing material used in solvent cleaning activities. All such records shall be made available to APCD personnel upon request (Rule 74.6.F). The records shall summarize the following information:

a) Solvent name and manufacturer's description.

b) All intended uses of the solvent at the facility, classified as follows:

1) Cleanup, including application equipment cleaning, or

2) Cleaning of electronic components, electrical apparatus components, medical devices, or aerospace components, or

3) Solvent used pursuant to an exemption in Section E of Rule 74.6.C. (specify exemption claimed)

VCAPCD Permit To Operate Number 07141
Issued To C.D. Lyon Construction Inc.
Valid October 1, 2007 to September 30, 2008

c) The ROC content in units of grams of ROC per liter of material (and ROC composite partial pressure in units of mm Hg @ 20C, if applicable) of the solvent.

d) The mix ratio, if the solvent is a mix of materials blended by the operator.

Within 30 days after receipt of this permit, the permittee may petition the Hearing Board to review any new or modified condition (Rule 22).

This permit, or a copy, shall be posted reasonably close to the subject equipment and shall be accessible to inspection personnel (Rule 19). This permit is not transferable from one location to another unless the equipment is specifically listed as being portable (Rule 20).

This Permit to Operate shall not be construed to allow any emission unit to operate in violation of any state or federal emission standard or any rule of the District.

Terri Thomas
Engineering Division

For:

Michael Villegas
Air Pollution Control Officer

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment
Form TVPF46/12-24-98 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: 74.2	Description: Short Term Activity - Architectural Coatings.

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Maintain VOC records applied by personnel. CD Lyon Construction, Inc. (PTO 07141) performs abrasive blasting and architectural coating at the Mill.

2. Yes — Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method is continuous or intermittent:

   Continuous – As indicated by a continuous monitoring device
   X Intermittent – As indicated by non- continuous periodic monitoring

4. No — During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5. No — During the time period covered by this compliance certification, does the monitoring data indicate any exceedences, if applicable? An *exceedence* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

6. No — During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?

7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedences, or other indication of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.

8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification

04/01/07 to 03/31/08

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment
Form TVPF46/12-24-98 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
40CFR61.M	Short Term Activity - National Emission Standard for Asbestos.

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Follow inspection, record keeping, and notification procedures from 40CFR61.145.

2. Yes — Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method is continuous or intermittent:

   Continuous – As indicated by a continuous monitoring device
   X Intermittent – As indicated by non- continuous periodic monitoring

4. No — During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5. No — During the time period covered by this compliance certification, does the monitoring data indicate any exceedences, if applicable? An *exceedence* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

6. No — During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?

7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedences, or other indication of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.

8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification
04/01/07 to 03/31/08

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment
Form TVPF46/12-24-98 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: 40CFR68 RMP	Description: Risk Management Plan.

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Exempt from federal regulations. State plan written and submitted to Oxnard CUPA in 12/2001. Latest update submitted 12/2006.

2. Yes — Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method is continuous or intermittent:

   Continuous – As indicated by a continuous monitoring device
   X Intermittent – As indicated by non- continuous periodic monitoring

4. No — During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5. No — During the time period covered by this compliance certification, does the monitoring data indicate any exceedences, if applicable? An *exceedence* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

6. No — During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?

7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedences, or other indication of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.

8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification

04/01/07 to 03/31/08

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number:	Description:
40CFR82	Protection Of Stratospheric Ozone.

Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable.

Facility did not conduct activities subject to this regulation during compliance year.

2. Yes — Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if this compliance determination method is continuous or intermittent:

   Continuous – As indicated by a continuous monitoring device
   X Intermittent – As indicated by non- continuous periodic monitoring

4. No — During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

5. No — During the time period covered by this compliance certification, does the monitoring data indicate any exceedences, if applicable? An *exceedence* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

6. No — During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?

7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedences, or other indication of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.

8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification
04/01/07 to 03/31/08

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Quantifiable Applicable Requirement or Part 70 Permit Condition Attachment
Form TVPF47/12/21/98

Emission Unit Description:			Pollutant:
Gas Turbine Based Cogeneration Unit			NOx
Measured Emission Rate:	Limited Emission Rate:	Specific Source Test or Monitoring Record Citation	
11.02 ppm @ 15% O2	12 ppm @ 15% O2	Accurate Environmental Test Date: 2/21/2008	

Emission Unit Description:			Pollutant:
Gas Turbine Based Cogeneration Unit			NH3
Measured Emission Rate:	Limited Emission Rate:	Specific Source Test or Monitoring Record Citation	
4.62 ppm @ 15% O2	5.00 ppm @ 15% O2	Accurate Environmental Test Date: 2/21/2008	

Emission Unit Description:			Pollutant:
Gas Turbine Based Cogeneration Unit (Running at 25 MW Output)			NOx
Measured Emission Rate:	Limited Emission Rate:	Specific Source Test or Monitoring Record Citation	
45.06 TPY	50.00 TPY	CEMS Emission Calculation Test Date: Relative accuracy test on 02/21/2008	

Emission Unit Description:			Pollutant:
Gas Turbine Based Cogeneration Unit (Running at 25 MW Output)			CO
Measured Emission Rate:	Limited Emission Rate:	Specific Source Test or Monitoring Record Citation	
48.34 TPY	97.66 TPY	CEMS Emission Calculation Test Date: Relative accuracy test on 02/21/2008	

Emission Unit Description:			Pollutant:
Nebraska Boiler (standby only, natural gas only)			NOx
Measured Emission Rate:	Limited Emission Rate:	Specific Source Test or Monitoring Record Citation:	
52 ppm	74 ppm @ 3% O2	Test Date: WCE 12/22/94	

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Quantifiable Applicable Requirement or Part 70 Permit Condition Attachment
Form TVPF47/12/21/98

Emission Unit Description:			Pollutant:
Nebraska Boiler (standby only, No. 2 fuel oil)			NOx
Measured Emission Rate:	Limited Emission Rate:	Specific Source Test or Monitoring Record Citation:	
NA	67 ppm @ 3% O2	Test Date: Not operated with fuel oil except for tests.	

Emission Unit Description:			Pollutant:
Maxon Duct Burner			NOx
Measured Emission Rate:	Limited Emission Rate:	Specific Source Test or Monitoring Record Citation:	
1.38 TPY	1.90 TPY	Test Date: WCE 8/17/95	

Emission Unit Description:			Pollutant:
Measured Emission Rate:	Limited Emission Rate:	Specific Source Test or Monitoring Record Citation:	

Emission Unit Description:			Pollutant:
Measured Emission Rate:	Limited Emission Rate:	Specific Source Test or Monitoring Record Citation:	

Emission Unit Description:			Pollutant:
Measured Emission Rate:	Limited Emission Rate:	Specific Source Test or Monitoring Record Citation:	