



The P&G Paper Products Co.
800 North Rice Avenue
Oxnard, CA 93030
www.pg.com

February 12, 2010

Mr. Keith Duval
Compliance Division, Manager
Ventura County APCD
669 County Square Drive
Ventura, California 93003

Subject: 2009 Reporting Year Part 70 Compliance Certification

Mr. Duval:

Enclosed is The Procter & Gamble Paper Products Company's Oxnard facility, Part 70 Permit No. 00015 Compliance Certification for the January 1, 2009 through December 31, 2009 reporting period. This reporting period is inclusive of Permit No. 00015 (rev 291) which was effective until February 4, 2009 and renewed Permit No. 00015(rev 351) which was issued on February 5, 2009 and remains in effect until December 31, 2013.

I can be reached at 805-485-8871, x8912 or lim.ks@pg.com should you have any questions about our facilities certification.

Respectfully,

Mr. Kim Lim
Site Environmental Leader

Cc: Mr. Gerardo Rios, Permits, Chief, US EPA Region IX
Ms. Vera Ingenhütt, Plant Manager, P&G
Ms. Kathleen Green, Environmental Systems Leader, P&G

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Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM

Cover Sheet

Form TVPF45/12-24-98 Page 2 of 2

A copy of each compliance certification shall be submitted to EPA Region IX at the following address:

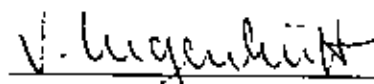
Mr. Gerardo Rios, Chief
Permits Office (AIR-3)
Office of Air Division
EPA Region IX
75 Hawthorne Street
San Francisco, CA 94105

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:  Ms. Vera Ingenhoff | Title: Plant Manager | Date: 02/11/10 |
|---|----------------------|-------------------|

Time Period Covered by Compliance Certification (MM/DD/YY):

PO00015 (rev291) applicable from: 01/01/09 to 2/4/09
PO00015 (rev351) applicable from: 02/05/09 to 12/31/09

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM

Cover Sheet

Form TVPF45/07-21-03 Page 1 of 2

Instructions

This compliance certification cover sheet signed by the responsible official, Form TVPF45, must be submitted annually, on the anniversary date of the Part 70 permit; or on a more frequent schedule, if required by an applicable requirement or permit condition. To complete the compliance certification, you will need to attach the following to this sheet:

1. A completed compliance certification permit form (Form TVPF46) for each applicable requirement or Part 70 permit condition. Be sure to attach to the form any information specifically required to be submitted with the compliance certification by the applicable requirement or Part 70 permit condition. On this form, indicate the method(s) for determining compliance; if you are currently in compliance, as determined by the most recent monitoring measurement or observation; and whether the method(s) used for determining compliance indicate continuous or intermittent compliance during the period of certification. Continuous compliance should be checked if the source is in compliance as determined by all monitoring measurements required by the permit during the certification period. Intermittent compliance should be checked if any of these monitoring measurements, or any other information or data, indicates a failure to meet a term or condition of the permit, including a failure to monitor, report, or collect data as required by the permit. For example, if the permit requires an annual source test to demonstrate compliance and that annual source test indicates compliance, and no pre-test or other information indicated noncompliance during the period, compliance is considered to be continuous for the reporting period. If the answer to Question No. 4, 5 or 6 is "Yes" on compliance certification permit form TVPF46, compliance cannot be considered continuous without some further explanation or documentation.

In addition, for the time period covered by the certification, please identify any excursions or exceedances as indicated by the monitoring data. Also identify any information or data beyond the required monitoring that indicates that you are not in compliance. Note that you may cross reference any previous reports regarding compliance status that have previously been submitted to the District.

2. For each applicable requirement or Part 70 permit condition that requires compliance with a quantifiable emission rate, attach a completed quantifiable applicable requirement or Part 70 permit condition form (TVPF47) to Form TVPF46 for all emission units subject to the requirement or condition. On this form, please indicate the emission units subject to the requirement or condition; the pollutant regulated by the requirement or condition; the most recent measured emission rate, and the limited emission rate, both in units consistent with the requirement or condition; and a specific source test or monitoring record citation including the test date.

In lieu of filling out Forms TVPF46 and/or TVPF47, you may supply all of the necessary information required on the attached forms in your own format, and attach this information to Form TVPF45.

2009 Reporting Year

Annual Title V Compliance Certification

For

The Procter & Gamble Paper Products Company
Oxnard, CA Facility

VCAPCD Permit No. 00015

Contact: Mr. Kim Lim
Site Environmental Leader
805-485-8871, x8912
Lim.ks@pg.com

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2

Permit Section: 1

Stationary Source Descriptions

Compliance Certification Not Applicable –
This Section is for Informational Purposes Only

Permit Section: 2

Permitted Equipment and Applicable Requirements Table

Compliance Certification Not Applicable –
Section Lists Equipment and Applicable Requirements



Permit Section: 3

Permitted Throughput and Consumption Limit Table

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
 Applicable Requirement or Part 70 Permit Condition Attachment
 Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

| | |
|---|---|
| Citation, including Attachment Number and/or Permit Condition Number: Section 3 - Permitted Throughput Limits | Description: List of Throughput Permit Limits for Emissions Units |
|---|---|

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.

Track 12 month rolling totals, based on monthly data for regulated emissions including ROC's. Electronic files and paper copies of tracking sheets are maintained.

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if compliance during the reporting period was continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

4. Yes 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. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* 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."

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

Form TVPF46/12-24-98 Page 2 of 2

6. Yes 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, exceedances, or other indications 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. **Not Applicable**
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. **Not Applicable**

Time Period Covered by Compliance Certification (MM/DD/YY):

PG00015 (rev291) applicable from: 01/01/09 to 2/4/09
PG00015 (rev351) applicable from: 02/05/09 to 12/31/09

Permit Section: 4

Permitted Emissions Table

Compliance Certification Not Applicable –

The permitted emissions in the units of Tons per Year and Pounds per Hour listed in the permitted emissions tables are not directly enforceable as permit conditions. AB2588 Program managed separately per District requirements.

Permit Section: 5

Exempt Equipment List

Compliance Certification Not Applicable –

The equipment list table is for informational purposes only; it is not enforceable.

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
 Applicable Requirement or Part 70 Permit Condition Attachment
 Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

| | |
|---|---|
| Citation, Including Attachment Number and/or Permit Condition Number: Section 6 – Attachment 74.9N7 (11/14/00) Emergency Standby Stationary Internal Combustion Engines | Description: Condition 1 - Engine Emergency or Maintenance Operation <50 hrs/yr Condition 2 - Emergency Engines are equipped with operating, non resettable, elapsed hour meters. Condition 3 - Maintain the following records: Hours of operation for calendar year during maintenance operation Date, time, duration and reason for emergency operation Engine data |
|---|---|

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.

| |
|---|
| Condition 1 – Fire/Emergency and Maintenance hr runtimes tracked in monthly log. Condition 2 – All engines are equipped with a non-resettable hour meter. Condition 3 – Accumulated operational hrs for each applicable engine are totaled for annual compliance. Simplex event logs are kept for date, time, duration and reason for emergency operation. Engine data sheets are maintained |
|---|

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if compliance during the reporting period was continuous or intermittent:
 Continuous - All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

4. Yes 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. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* 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.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment
Form TVPF46/07-21-03 Page 2 of 2

6. Yes 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, exceedances, or other indications 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. **Not Applicable**
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. **Not Applicable**

Time Period Covered by Compliance Certification (MM/DD/YY):

PO00015 (rev291) applicable from: 01/01/09 to 2/4/09
PO00015 (rev351) applicable from: 02/05/09 to 12/31/09

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
 Applicable Requirement or Part 70 Permit Condition Attachment
 Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

| | |
|---|---|
| Citation, Including Attachment Number and/or Permit Condition Number: Section 6 - 74.15 N.1 Boilers, Heater Treaters, Steam Generators, and Process Heaters | Description: Condition 1 – Emissions: NOx < 40 ppmvd, CO < 400 ppmvd Condition 2 – Source Tested every 24 months using ARB Method 100 Condition 3.a-b: Alternate Fuel Use limitations Condition 4 – Startup emissions exemption Condition 5 – Recordkeeping: Alternate Fuels, Biennial Source test report Condition 6 – Flue Gas Recirculation requirements |
|---|---|

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.

| |
|---|
| <p>Condition 1 & 2 - Biennial source test conducted on March 25, 2008. See attached TV47 form. CARB Method 100 was used for CO and NOx.</p> <p>Condition 3 – Only Natural Gas was used for the 2009 calendar year.</p> <p>Condition 4 – <i>Instructional Condition; Certification not applicable.</i></p> <p>Condition 5 – Source Test report furnished to District on May 8, 2008.</p> <p>Condition 6 – Compliance with Section 7, Attachment PO00015PC4 permit requirements.</p> |
|---|

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if compliance during the reporting period was continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

4. Yes 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. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* 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."

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment
Form TVPF46/07-21-03 Page 2 of 2

6. Yes 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, exceedances, or other indications 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. **Not Applicable**
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. See: 2009- Section 6 - 74.15N1 - B301 Source Test Data TVPF47

Time Period Covered by Compliance Certification (MM/DD/YY):

PO00015 (rev291) applicable from: 01/01/09 to 2/4/09
PO00015 (rev351) applicable from: 02/05/09 to 12/31/09

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

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|---|---|---|
| Emission Unit Description: 100 mmBtu/hr Babcock & Wilcox Steam Boiler | | Pollutant: NOx |
| Measured Emission Rate: 27.40 ppm @ 3% O2 | Limited Emission Rate: 40 ppm @ 3% O2 | Specific Source Test or Monitoring Record Citation: Horizon P27-029-FR Test Date: 3/25/08 |

| | | |
|---|--|---|
| Emission Unit Description: 100 mmBtu/hr Babcock & Wilcox Steam Boiler | | Pollutant: CO |
| Measured Emission Rate: 116.0 ppm @ 3% O2 | Limited Emission Rate: 400 ppm @ 3% O2 | Specific Source Test or Monitoring Record Citation: Horizon P27-029-FR Test Date: 3/25/08 |

B-301 Emissions Source Test is due every 24 months

Test Notification Provided On: 3/11/08

Test Date: 3/25/08

Test Report Submitted On: 5/8/08

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

Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

| | |
|---|---|
| Citation, including Attachment Number and/or Permit Condition Number: Section 6 – Attachment 74.19N1(11/11/03) Graphic Arts Operations Without an Emissions Capture and Control System | Description: Condition 1: Only use flexographic inks < 225 g/l Condition 2: Fountain Solution < 80 g/l Condition 3: Cleaning using approved ROC content and composite partial pressure Solvents Condition 4: Usage of Methylene Chloride Prohibited Condition 5.a-d: Use Approved Cleaning Methods Condition 6: Closed Container Storage of Materials with ROC content Condition 7: Proper disposal of ROC Material Waste Condition 8.a-c: Maintain records (monthly) for inks and fountain solution usage Condition 9.a-e: Test Method utilization |
|---|---|

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.

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|---|
| Condition 1 – Chemical Approval Process verifies only <225 g/l ROC content inks used Condition 2 – Facility does not use Fountain Solution in Graphic Arts operations Condition 3 – ROC containing solvents are not used for cleaning. Solvent free, water based cleaning solution is used. Condition 4 – Per written procedures, facility utilizes solvent-free cleaning solutions (water) Condition 5 – Per written procedures, facility utilizes solvent-free cleaning solutions (water) Condition 6 – Visual observation of closed containers used while in storage, and closed piping used for ink conveyance Condition 7 – Facility resources trained to manage waste per CA Title 22, and Federal RCRA waste management requirements Condition 8 – Electronic and hardcopy records maintained for ink usage Condition 9 – Test conducted utilizing specified methods upon District request |
|---|

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 Continuous - All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes 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. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* 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."

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment
Form TVPF46/07-21-03 Page 2 of 2

6. Yes 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, exceedances, or other indications 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. **Not Applicable**
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. **Not Applicable**

Time Period Covered by Compliance Certification (MM/DD/YY):

PO00015 (rev291) applicable from: 01/01/09 to 2/4/09
PO00015 (rev351) applicable from: 02/05/09 to 12/31/09

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM0
 Applicable Requirement or Part 70 Permit Condition Attachment
 Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

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|--|--|
| Citation, Including Attachment Number and/or Permit Condition Number: Section 6 – Attachment 103N5 (02/09/99) Boiler Capacity Factor | Description: Condition 1 – Operate at less than 30% Capacity Factor for CEMs exemption Condition 2 – Install CEMs upon request of District Condition 3 – Monthly fuel records and annual capacity factor Calculation |
|--|--|

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.

| |
|--|
| Condition 1 – Recordkeeping Condition 2 – CEMs installation upon request of District Condition 3 – Monthly Calculation of Annual Capacity Factor – See attached sheet |
|--|

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
 Continuous – All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
4. Yes 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. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* 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.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment
Form TVPF46/07-21-03 Page 2 of 2

6. Yes 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, exceedances, or other indications 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. **Not Applicable**
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. **Not Applicable**

Time Period Covered by Compliance Certification (MM/DD/YY):

PO00015 (rev291) applicable from: 01/01/09 to 2/4/09
PO00015 (rev351) applicable from: 02/05/09 to 12/31/09

Annual Heat Input (AHI):

Higher Heating Value: 1050 BTU/scf
 1050 MMBTU/MMSCF

| Fuel Usage (MMSCF) | B301 |
|-----------------------|--------------|
| Nov-08 | 0.02 |
| Dec-08 | 0.16 |
| Jan-09 | 0.14 |
| Feb-09 | 1.34 |
| Mar-09 | 0.00 |
| Apr-09 | 0.03 |
| May-09 | 2.03 |
| Jun-09 | 0.38 |
| Jul-09 | 0.70 |
| Aug-09 | 2.79 |
| Sep-09 | 4.59 |
| Dec-09 | 0.37 |
| 12 Month Total | 12.53 |

AHI = Fuel Used in 12 Months (MMscf) * Higher Heating Value (MMBTU/MMscf)

AHI = 12.53464 * 1050

AHI = 13,161 MMBTU

Maximum Potential Heat Input (MPHI)

Capacity Factor (CF)

Rated Firing Capacity (RFC): 100 MMBTU/hr Capacity Factor = Ratio of Annual Actual Heat Input to Maximum Potential Heat Input

Maximum Potential Operating Hours (MPOH): 8760 hrs

CF = AHI / MPHI

MPHI = RFC * MPOH

CF = 0.0150244 Ratio

MPHI = 876,000 MMBTU

% CF = 1.5% (%CF)

30% of MPHI (Maximum Allowable): 262800 MMBTU

Maximum Allowable Rolling 12 month Fuel Usage: 250.29 MMSCF

Ventura County Air Pollution Control District
Applicable Requirement or Part 70 Permit Condition Attachment
 Form TVPF46/07-21-03 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

| | |
|--|--|
| Citation, Including Attachment Number and/or Permit Condition Number: | Section 6 – Attachment STAMLN15LM6000-NOx-rev291 LM6000 Gas Turbine Based Cogeneration Unit |
| <p>Description:</p> <p>Condition 1: NOx < 2.5 ppmvd avg. @ 15% O2 over 3 hr. period, Annual Source Test, and CEMs</p> <p>Condition 2: ROC <2.0 ppmvd @ 15% O2 average over 3 consecutive hrs. Operate Oxidation Catalyst & test annually.</p> <p>Condition 3: Emissions Exemption: 12 hr cold startup, 3 hr normal-startup, 2 hr unplanned load changes, and 1 hr shutdown</p> <p>Condition 4: Outlet Ammonia < 20 ppmvd verified annually via source test</p> <p>Condition 5.a-f: Source Test Annually at normal operating load. Test Notification and protocol submitted 15 days in advance with report submitted within 45 days of test to include permit specified parameters</p> <p>Condition 6: PM < 3.08 lbs/MMscf & source test using method five upon District request</p> <p>Condition 7.a-l: Operate and maintain CEMs & record permit specified data</p> <p>Condition 8.a-c: CEMs calibration and maintenance per 40 CFR, part 51, Appendix P, Sections 3.0 through 3.9.5</p> <p>Condition 9: Written Notification of monitored emission standards violations within 96 hours</p> <p>Condition 10.a-d: Permanent CEMs records, to include permit specified data</p> <p>Condition 11: Upon request submit CEMs data to District</p> <p>Condition 12: CEMs data reduced per 40 CFR, part 51, appendix P, paragraphs 5.0 – 5.3.3</p> <p>Condition 13: Records maintained per permit conditions</p> <p>Condition 14.a-b: Turbine Operating hours report & annual source test report</p> | |

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.

| |
|--|
| <p>Condition 1, 2, 4 and 5 – Annual source test conducted on March 24-25, 2009 Test Methods: NOx - EPA Method 20; CO - ARB Method 100; ROC - EPA Method 18; O2 - ARB Method 100; Fuel HV – ASTM Method D 3588-91*; NH3 - BAAQMD Method ST-1B. See TVPF 47. * Note: Method ASTM Method D 1826-88 is no longer performed by laboratory ASTM Method D 3588-91 is equivalent.</p> <p>Condition 2, 7, 10, 11, 13 – Recordkeeping</p> <p>Condition 3 – Exemptions applied as encountered during calendar year</p> <p>Condition 5 – Utilize certified Source Test vendors, use specified test methods, and submit documentation per deadline requirements</p> <p>Condition 6 – Conduct source test for PM emissions using EPA Method 5 upon District Request</p> <p>Condition 8 - Maintenance via operators with assistance from CEM manufacturer</p> <p>Condition 9 – Operational procedures ensure compliance with 96 hour reporting requirement</p> <p>Condition 12 – Data Acquisition System data reduction and recordkeeping per specification</p> <p>Condition 14 – Turbine report submitted semi-annually, source test submitted annually</p> <p>* Permit requires Test Method ASTM D2166-88. Approved Test Plan specified use of, equivalent method ASTM D3588-91, current industry standard for fuel HHV evaluation.</p> |
|--|

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition – See response to question #4
4. Yes 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."
 See attached "2009 – Section 6 – LM6000 CEMS Malfunction Summary"
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* 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." See attached Summary of previously reported LM6000 Non Exempt Excess Emissions and Summary of LM6000 CEMS Malfunctions

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment
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6. Yes 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, exceedances, or other indications 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. **Not Applicable.**
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. **See attached TVPF47**

Time Period Covered by Compliance Certification (MM/DD/YY):

PO00015 (rev291) applicable from: 01/01/09 to 2/4/09
PO00015 (rev351) applicable from: 02/05/09 to 12/31/09

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM

Quantifiable Applicable Requirement or Part 70 Permit Condition Section 6 - Attachment STRMLN15LM6000-NOx-rev291
 Form TVPF47/12-21-98

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|--|--|---|
| Emission Unit Description: LM6000 turbine | | Pollutant: NOx |
| Measured Emission Rate: 1.92 ppm @ 15% O₂ | Limited Emission Rate: 2.5 ppm @ 15% O₂ | Specific Source Test or Monitoring Record Citation: Horizon Test #: P27-032-FR COMP Test Date: March 24-25, 2009 |

| | | |
|---|--|---|
| Emission Unit Description: LM6000 turbine | | Pollutant: CO |
| Measured Emission Rate: 12.37 lbs/MMscf | Limited Emission Rate: 14.11 lbs/MMscf | Specific Source Test or Monitoring Record Citation: Horizon Test #: P27-032-FR COMP Test Date: March 24-25, 2009 |

| | | |
|---|--------------------------------------|---|
| Emission Unit Description: LM6000 turbine | | Pollutant: O₂ |
| Measured Emission Rate: 14.98% | Limited Emission Rate: N/A | Specific Source Test or Monitoring Record Citation: Horizon Test #: P27-032-FR COMP Test Date: March 24-25, 2009 |

| | | |
|---|--|---|
| Emission Unit Description: LM6000 turbine | | Pollutant: ROC |
| Measured Emission Rate: <0.5 ppm @ 15% O₂ | Limited Emission Rate: 2 ppm @ 15% O₂ | Specific Source Test or Monitoring Record Citation: Horizon Test #: P27-032-FR COMP Test Date: March 24-25, 2009 |

| | | |
|---|--------------------------------------|---|
| Emission Unit Description: LM6000 turbine | | Pollutant: Fuel HHV |
| Measured Emission Rate: 419.90 MMBTU/hr | Limited Emission Rate: N/A | Specific Source Test or Monitoring Record Citation: Horizon Test #: P27-032-FR COMP Test Date: March 24-25, 2009 |

| | | |
|--|---|---|
| Emission Unit Description: LM6000 turbine | | Pollutant: NH₃ |
| Measured Emission Rate: 0.44 ppm @ 15% O₂ | Limited Emission Rate: 20 ppm @ 15% O₂ | Specific Source Test or Monitoring Record Citation: Horizon Test #: P27-032-FR COMP Test Date: March 24-25, 2009 |

LM6000 Emission Source Test and RATA are required every 12 months.

Test Notification Provided On: 2/12/09

Test Date: 3/25/09

Test Report Submitted On: 5/5/09

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Summary of LM6000 CEMS Non - Exempt Excess Emissions 2009

**Additional Information for TVPF46 form: Section 6 - STRMLN15LM6000-NOx-rev291 - GE LM6000 Gas Turbine
Based Cogeneration Unit**

During the 2009 calendar year our LM6000 Turbine unit had the following Non Exempt Emissions.

On 4/26/09 the LM6000 had one hour of a non-exempt excess NOx emission which did not result in an exceedance of the turbine's permitted 3-hour emissions limit. This non exempt excess emission was previously reported in a CEMS Quarterly Report.

Summary of LM6000 CEMS Malfunction 2009

Additional Information for TVPF46 form: Section 6 - STRMLN15LM6000-NOx-rev291 - GE LM6000 Gas Turbine
Based Cogeneration Unit

During the 2009 calendar year our LM6000 Turbine unit had the following Malfunctions.

All periods of NO_x, CO, O₂ analyzer calibration malfunction times were reported in Continuous Emissions Monitoring reports submitted: JFM '09 on 4/30/09, AMJ '09 on 7/30/09, JAS '09 on 10/30/09, and OND '09 on 1/30/10.



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Applicable Requirement or Part 70 Permit Condition

| | |
|--|---|
| Citation, Including Attachment Number and/or Permit Condition Number: | Section 6 – Attachment STRMLN15LM2500-NOx,CO-rev291 Section 6 – Attachment STRMLN15LM2500-NOx,CO-rev351 GE LM-2500 Gas Turbine Based Cogeneration Unit NOx and CO Applicable Requirements |
| Description: | |
| Condition 1 – 3 Hour NOx average < 24 ppmvd @ 15% O ₂ while burning Natural Gas Condition 2 – Emissions Exemption: 1 hr for startup & shutdown Condition 3 – Source Test Annually at normal operating load. Test Notification and protocol submitted 15 days in advance with report submitted 45 days after test to include permit specified parameters Condition 4 – Operate and maintain CEMs & record permit specified data Condition 5 – CEMs calibration and maintenance per 40 CFR, part 51, Appendix P, Sections 3.0 through 3.9.6 Condition 6 – Written Notification of emissions violations within 96 hours Condition 7 – Permanent CEMs records, to include permit specified data Condition 8 – Upon request submit CEMs data to District Condition 9 – CEMs data reduced per 40 CFR, part 51, appendix P, paragraphs 5.0 – 5.3.3 Condition 10 – Records maintained per permit conditions Condition 11 – Turbine Operating hours report & annual source test report | |

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.

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| Condition 1, 3 – Annual source test conducted on 5/27/09. Protocol submitted 15 days prior and Results submitted 45 days after the source test. Test Methods – NOx: EPA Method 20, O ₂ : ARB Method 100, CO: ARB Method 100, Fuel HHV: ASTM D3588-91*. Condition 1, 2, 4, 7, 8, 9, 10 – Recordkeeping Condition 5 – Maintenance via operators with assistance from CEMs manufacturer Condition 6 – Operational procedures ensure compliance with 96 hour reporting requirement Condition 11 – Turbine report submitted semi-annually, source test submitted annually <small>* Permit requires Test Method ASTM D2166-93. Approved Test Plan specified use of, equivalent method ASTM D3588-91, current industry standard for fuel HHV evaluation.</small> |
|--|

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
- Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition.
- See response to question #5**
4. Yes 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. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* 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." **See attached Summary of previously reported LM2500 Non Exempt Excess Emissions and Summary of LM2500 CEMS Malfunctions**

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment
Form TVPF46/07-21-03 Page 2 of 2

6. Yes 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, exceedances, or other indications 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. **See response to question #5**
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. **See attached TVPF47**

Time Period Covered by Compliance Certification (MM/DD/YY):

PO00015 (rev291) applicable from: 01/01/09 to 2/4/09
PO00015 (rev351) applicable from: 02/05/09 to 12/31/09

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM

Quantifiable Applicable Requirement for Part 70 Permit Section 6 - Attachment STRMLN15LM2500-NOx,CO-rev351

Form TVPF47/12-21-98

| | | |
|--|--|---|
| Emission Unit Description: LM2500 turbine | | Pollutant: NOx |
| Measured Emission Rate: 21.50 ppm @ 15% O2 | Limited Emission Rate: 24 ppm @ 15% O2 | Specific Source Test or Monitoring Record Citation: Horizon Test #: P27-034-FR COMP Test Date: May 27, 2009 |

| | | |
|--|--|---|
| Emission Unit Description: LM 2500 turbine | | Pollutant: CO |
| Measured Emission Rate: 21.60 pph | Limited Emission Rate: 54.98 pph | Specific Source Test or Monitoring Record Citation: Horizon Test #: P27-034-FR COMP Test Date: May 27, 2009 |

| | | |
|---|--------------------------------------|---|
| Emission Unit Description: LM2500 turbine | | Pollutant: O2 |
| Measured Emission Rate: 14.22% | Limited Emission Rate: N/A | Specific Source Test or Monitoring Record Citation: Horizon Test #: P27-034-FR COMP Test Date: May 27, 2009 |

| | | |
|---|--------------------------------------|---|
| Emission Unit Description: LM2500 turbine | | Pollutant: Heat Rate |
| Measured Emission Rate: 243.10 MMBTU/hr | Limited Emission Rate: N/A | Specific Source Test or Monitoring Record Citation: Horizon Test #: P27-034-FR COMP Test Date: May 27, 2009 |

LM2500 Emission Source Test and RATA are required every 12 months.

Test Notification Provided On: 5/5/09

Test Date: 5/27/09

Test Report Submitted On: 6/26/09

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Summary of LM2500 CEMS Non - Exempt Excess Emissions 2009

**Additional Information for TVPF46 form: Section 6 - STRMLN15LM2500-NOx-rev351 - GE LM2500 Gas Turbine
Based Cogeneration Unit**

During the 2009 calendar year our LM2500 Turbine unit had the following Non Exempt Emissions.

On 2/22/09 the LM2500 had one hour of a non-exempt excess NOx emission which did not result in an exceedance of the turbine's permitted 3-hour emissions limit. This non exempt excess emission was previously reported in a CEMS Quarterly Report.

In addition, Breakdown Reports submitted on 1/02/09 and 2/08/09 reported additional non exempt excess emissions.

Summary of LM2500 CEMS Malfunctions 2009

Additional Information for TVPF46 form: Section 6 - Attachment STRMLN15LM2500-NOx,CO-rev351

During the 2009 calendar year our LM2500 Turbine unit had the following Malfunctions.

All periods of NO_x, CO, O₂ analyzer calibration malfunction times were reported in Continuous Emissions Monitoring reports submitted: JFM '09 on 4/30/09, AMJ '09 on 7/30/09, JAS '09 on 10/30/09, and OND '09 on 1/30/10.

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

| | |
|---|---|
| Citation, Including Attachment Number and/or Permit Condition Number: Section 6 – Attachment STRMLN15-SO₂-rev351 LM6000 and LM2500 Gas Turbine Based Cogeneration Units SO₂ Applicable Requirements - Streamlined | Description: Condition 1 – Gaseous Fuel < 50 grains sulfur per 100 Cu Ft. of fuel Condition 2 – If use PUC fuels used Rule 64 compliance is assumed Condition 3 – All emissions must be < 300 ppm SO ₂ at discharge Condition 4 – Upon Request source test for SO ₂ at discharge points |
|---|---|

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.

Condition 1-3 - Both the LM6000 and LM2500 exclusively used PUC-quality natural gas in 2009.
 Condition 4 – Source Test upon request

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if compliance during the reporting period was continuous or intermittent:
 Continuous - All monitoring measurements show compliance with the Part 70 permit condition
Natural Gas fuel is supplied by Southern California Gas Company, which conforms to CPUC standards.
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

4. Yes 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. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* 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.”

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6. Yes 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, exceedances, or other indications 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. **Not Applicable**
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. **Not Applicable**

Time Period Covered by Compliance Certification (MM/DD/YY):

PO00015 (rev291) applicable from: 01/01/09 to 2/4/09
PO00015 (rev351) applicable from: 02/05/09 to 12/31/09

Ventura County Air Pollution Control District
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Applicable Requirement or Part 70 Permit Condition

| | |
|---|---|
| Citation, Including Attachment Number and/or Permit Condition Number: Section 6 – Attachment NESHAP KK 40 CFR Part 63 Subpart KK Applicable Requirements | Description: Condition 1 – Use < 10 Ton per 12 month rolling period of each HAP Condition 2 – Use < 25 tons total per 12 month rolling period for all HAPs Condition 3 – HAP exclusion for various activities Condition 4 – Considered Area Source if comply with HAP limitations Condition 5 – Maintain monthly records and calculations of HAP materials and their HAP fractions Condition 6 – Provide 40 CFR 63.9(b) Notification |
|---|---|

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.

Conditions 1 – 6: Site has maintained non-major HAP's status, by emitting less than 10 TPY of any one HAP, and less than 25 TPY of all HAP's. HAP emission and mass fraction monthly records required by permit condition are maintained.

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if compliance during the reporting period was continuous or intermittent:

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

4. Yes 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."

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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. **Not Applicable**

Time Period Covered by Compliance Certification (MM/DD/YY):

PO00015 (rev291) applicable from: 01/01/09 to 2/4/09
PO00015 (rev351) applicable from: 02/05/09 to 12/31/09