



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

February 14, 2011

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

Subject: 2010 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, 2010 through December 31, 2010 reporting period.

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  
Mr. William Sims, Plant Manager, P&G  
Ms. Kathleen Green, Environmental Systems Leader, P&G

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# **2010 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



Ventura County  
Air Pollution  
Control District

**ANNUAL COMPLIANCE CERTIFICATION  
SIGNATURE COVER FORM**

A copy of each Annual Compliance Certification shall be submitted to EPA, Region 9, at the following address:


Mr. Gerardo Rios, Chief  
Permits Office (AIR-3)  
Office of Air Division  
EPA Region 9  
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.

<p>Signature and Title of Responsible Official:</p>  <p>Mr. William Sims</p> <p>Title: Oxnard Plant Manager</p>	<p>Date:</p> <p>02-14-2011</p>
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<p>Time Period Covered by Compliance Certification</p> <p>01/01/10 to 12/31/10</p>
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# 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

## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2010 - December 31, 2010**

<b>A. Attachment # or Permit Condition #:</b> <b>Section 3 - Permitted Throughput Limits</b>	<b>D. Frequency of monitoring:</b> Monthly
<b>B. Description: Permitted Throughput Limits</b> List of Throughput Permit Limits for Emissions Units	<b>E. Source test reference method</b>  N/A
<b>C. Method of monitoring:</b> 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	<b>F. Currently in Compliance?</b> Y
	<b>G. Compliance Status:</b> C
	<b>H. *Excursions, exceedances, or other non-compliance:</b> N

# 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.

# **Permit Section: 6**

Specific Applicable Requirements (Attachments)



Ventura County Air  
Pollution Control  
District

## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2010 - December 31, 2010**

<b>A. Attachment # or Permit Condition #:</b> <b>Section 6 – Attachment 74.9N7 (11/14/00)</b>	<b>D. Frequency of monitoring:</b> <b>Monthly</b>
<b>B. Description: Stationary Internal Combustion Engines</b> 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 records for Hours of operation for calendar year during maintenance operation, Date/time/ duration/ and reason for emergency operation, Engine data	<b>E. Source test reference method</b>  <b>N/A</b>
<b>C. Method of monitoring:</b> 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 referenced for date, time, duration and reason for emergency operation, Engine data sheets are maintained	<b>F. Currently in Compliance?</b> <p style="text-align: center;"><b>Y</b></p> <b>G. Compliance Status: C</b>  <b>H. *Excursions, exceedances, or other non-compliance: N</b>

<b>A. Attachment # or Permit Condition #:</b> <b>Section 6 - 74.15 B.1</b>	<b>D. Frequency of monitoring:</b> <b>Biennial</b>
<b>B. Description: Boilers, Heater Treaters, Steam Generators, and Process Heaters</b> 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	<b>E. Source test reference method:</b> <b>Source Test Summary Form 1 of 4</b> <b>ARB Method 100:</b> NOx CO Stack Gas O2
<b>C. Method of monitoring:</b> Condition 1 & 2 - Biennial source test conducted on March 25, 2010. Condition 3 – Only Natural Gas was used for the 2010 calendar year. Condition 4 – Instructional Condition; Certification not applicable. Condition 5 – Source Test report furnished to District on May 8, 2010. Condition 6 – Compliance with Section 7, Attachment PO00015PC4 permit requirements.	<b>F. Currently in Compliance?</b> <p style="text-align: center;"><b>Y</b></p> <b>G. Compliance Status: C</b>  <b>H. *Excursions, exceedances, or other non-compliance: N</b>



**ANNUAL COMPLIANCE CERTIFICATION  
PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2010 - December 31, 2010**

<b>A. Attachment # or Permit Condition #:</b> <b>Section 6 – Attachment 74.19N1(11/11/03)</b>	<b>D. Frequency of monitoring:</b> <b>Monthly</b>
<b>B. Description: Graphic Arts Operations Without an Emissions Capture and Control System</b> 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	<b>E. Source test reference method</b>  <b>N/A</b>
<b>C. Method of monitoring:</b> 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 – 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	<b>F. Currently in Compliance?</b> <b>Y</b> <b>G. Compliance Status: C</b> <b>H. *Excursions, exceedances, or other non-compliance: N</b>

<b>A. Attachment # or Permit Condition #:</b> <b>Section 6 – Attachment 103N5 (02/09/99)</b>	<b>D. Frequency of monitoring:</b> <b>Monthly</b>
<b>B. Description: Boiler Capacity Factor</b> 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	<b>E. Source test reference method</b>  <b>N/A</b>
<b>C. Method of monitoring:</b> 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	<b>F. Currently in Compliance?</b> <b>Y</b> <b>G. Compliance Status: C</b> <b>H. *Excursions, exceedances, or other non-compliance: N</b>



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2010 - December 31, 2010**

<p><b>A. Attachment # or Permit Condition #:</b> <b>Section 6 – Attachment STRMLN15LM6000-NOx-rev291</b></p>	<p><b>D. Frequency of monitoring:</b> <b>Monthly</b></p>
<p><b>B. Description: LM6000 Gas Turbine Based Cogeneration Unit</b>            Condition 1: NOx &lt; 2.5 ppmvd avg. @ 15% O2 over 3 hr. period, Annual Source Test, and CEMs            Condition 2: ROC &lt;2.0 ppmvd @ 15% O2 average over 3 consecutive hrs. Operate Oxidation Catalyst &amp; test annually.            Condition 3: Emissions Exemption: 12 hr cold startup, 3 hr normal-startup, 2 hr unplanned load changes, and 1 hr shutdown            Condition 4: Outlet Ammonia &lt; 20 ppmvd verified annually via source test            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            Condition 6: PM &lt; 3.08 lbs/MMscf &amp; source test using method five upon District request            Condition 7.a-l: Operate and maintain CEMs &amp; record permit specified data            Condition 8.a-c: CEMs calibration and maintenance per 40 CFR, part 51, Appendix P, Sections 3.0 through 3.9.5            Condition 9: Written Notification of monitored emission standards violations within 96 hours            Condition 10.a-d: Permanent CEMs records, to include permit specified data            Condition 11: Upon request submit CEMs data to District            Condition 12: CEMs data reduced per 40 CFR, part 51, appendix P, paragraphs 5.0 – 5.3.3            Condition 13: Records maintained per permit conditions            Condition 14.a-b: Turbine Operating hours report &amp; annual source test report</p>	<p><b>E. Source test reference method</b> <b>Source Test Summary Form 2 of 4</b>             EPA Method 20 -NOx            ARB Method 100 -CO, O2            EPA Method 18 -ROC            ASTM Method D 3588-91 - Fuel HV            BAAQMD Method ST-1B-NH3</p>
<p><b>C. Method of monitoring:</b>            Condition 1, 2, 4 and 5 – Annual source test conducted on March 2-3, 2010            Condition 2, 7, 10, 11, 13 – Recordkeeping            Condition 3 – Exemptions applied as encountered during calendar year            Condition 5 – Utilize certified Source Test vendors, use specified test methods, and submit documentation per deadline requirements            Condition 6 – Conduct source test for PM emissions using EPA Method 5 upon District Request            Condition 8 - Maintenance via operators with assistance from CEM manufacturer            Condition 9 – Operational procedures ensure compliance with 96 hour reporting requirement            Condition 12 – Data Acquisition System data reduction and recordkeeping per specification            Condition 14 – Turbine report submitted semi-annually, source test submitted annually</p>	<p><b>F. Currently in Compliance?</b> <b>Y</b></p> <p><b>G. Compliance Status: I</b></p> <p><b>H. *Excursions, exceedances, or other non-compliance: Y</b></p> <p>See Deviation Summary: page 2 of 2</p>

<p><b>A. Attachment # or Permit Condition #:</b> <b>Section 6 – Attachment STRMLN15LM2500-NOx,CO-rev351</b></p>	<p><b>D. Frequency of monitoring:</b> <b>Monthly</b></p>
<p><b>B. Description: GE LM-2500 Gas Turbine Based Cogeneration Unit NOx and CO Applicable Requirements</b>            Condition 1 – 3 Hour NOx average &lt; 24 ppmvd @ 15% O2 while burning Natural Gas            Condition 2 – Emissions Exemption: 1 hr for startup &amp; 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 &amp; record permit specified data            Condition 5 – CEMs calibration and maintenance per 40 CFR, part 51, Appendix P, Sections 3.0 through 3.9.5            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 &amp; annual source test report</p>	<p><b>E. Source test reference method</b> <b>See Source Test Summary Form 3 of 4</b>             EPA Method 20 -NOx            ARB Method 100 -CO, O2            ASTM Method D 3588-91 - Fuel HV</p>
<p><b>C. Method of monitoring:</b>            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.            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</p>	<p><b>F. Currently in Compliance?</b> <b>Y</b></p> <p><b>G. Compliance Status: I</b></p> <p><b>H. *Excursions, exceedances, or other non-compliance: Y</b></p> <p>See Deviation Summary: page 1 of 2</p>



Ventura County Air  
Pollution Control  
District

## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2010 - December 31, 2010**

<b>A. Attachment # or Permit Condition #:</b> <b>Section 6 – Attachment STRMLN15-SOx-rev351</b>	<b>D. Frequency of monitoring:</b> <b>Monthly</b>
<b>B. Description: LM6000 and LM2500 Gas Turbine Based Cogeneration Units SOx Applicable Requirements -</b> 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 SO2 at discharge Condition 4 – Upon Request source test for SO2 at discharge points	<b>E. Source test reference method</b>  <b>N/A</b>
<b>C. Method of monitoring:</b> Condition 1-3 - Both the LM6000 and LM2500 exclusively used PUC-quality natural gas in 2009. Condition 4 – Source Test upon request	<b>F. Currently in Compliance?</b> <b>Y</b>  <b>G. Compliance Status: C</b>  <b>H. *Excursions, exceedances, or other non-compliance: N</b>

<b>A. Attachment # or Permit Condition #:</b> <b>Section 6 – Attachment NESHAP KK</b>	<b>D. Frequency of monitoring:</b> <b>Monthly</b>
<b>B. Description: 40 CFR Part 63 Subpart KK Applicable Requirements</b> 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	<b>E. Source test reference method</b>  <b>N/A</b>
<b>C. Method of monitoring:</b> Conditions 1 – 6: Site 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.	<b>F. Currently in Compliance?</b> <b>Y</b>  <b>G. Compliance Status: C</b>  <b>H. *Excursions, exceedances, or other non-compliance: N</b>

<b>A. Attachment # or Permit Condition #:</b> <b>Section 6 – Attachment ATCM Engine N1</b>	<b>D. Frequency of monitoring:</b> <b>Monthly</b>
<b>B. Description: ATCM for Stationary Compression Ignition Engines</b> Condition 1.a-e: Use specified approved fuels Condition 2: Monthly log of engine hours of operation Conditions 3.a-e: Maintain fuel purchase records	<b>E. Source test reference method</b>  <b>N/A</b>
<b>C. Method of monitoring:</b> Condition 1.a-e: Use specified approved fuels Condition 2: Monthly log of engine hours of operation Conditions 3.a-e: Maintain fuel purchase records	<b>F. Currently in Compliance?</b> <b>Y</b>  <b>G. Compliance Status: C</b>  <b>H. *Excursions, exceedances, or other non-compliance: N</b>

# **Permit Section: 7**

Permit Specific Conditions (Attachments)



Ventura County Air  
Pollution Control  
District

## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2010 - December 31, 2010**

<b>A. Attachment # or Permit Condition #:</b> <b>Section 7 – Attachment PO00015PC1rev 351</b>	<b>D. Frequency of monitoring:</b> <b>Monthly</b>
<b>B. Description: Throughput &amp; Consumption Limits and Solvent Records</b> Condition 1 – Monthly throughput (emissions) records Condition 2 – Solvent purchase and disposal records	<b>E. Source test reference method</b>  <b>N/A</b>
<b>C. Method of monitoring:</b> Condition 1 – Monthly records of emissions specified in Table 3 throughput column are recorded and available upon request. Condition 2 – Exempt Solvent list maintained and available upon request.	<b>F. Currently in Compliance? Y</b>  <b>G. Compliance Status: C</b>  <b>H. *Excursions, exceedances, or other non-compliance: N</b>

<b>A. Attachment # or Permit Condition #:</b> <b>Section 7 – Attachment PO00015PC2-rev 351</b>	<b>D. Frequency of monitoring:</b> <b>Monthly</b>
<b>B. Description: Combustion Emissions Units- LM6000, LM2500, B&amp;W Steam Boiler, 1X Hot Air, 1X Yankee Furnace, 2X Furnaces</b> Condition 1 – Facility wide TPY emissions limits for Combustion Units Condition 2 – All specified Combustion Units will be fired on Natural Gas (NG) Condition 3 – Maintain records: 12 mo. Rolling average fuel usage and emissions based on factor and CEM units.	<b>E. Source test reference method</b>  <b>N/A</b>
<b>C. Method of monitoring:</b> Condition 1 – Monthly monitoring of emissions records to ensure compliance with facility wide emissions limits. Condition 2 – Facility exclusively utilizes Natural Gas to fire all specified combustion units at facility.	<b>F. Currently in Compliance? Y</b>  <b>G. Compliance Status: C</b>  <b>H. *Excursions, exceedances, or other non-compliance: N</b>





Ventura County Air  
Pollution Control  
District

## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2010 - December 31, 2010**

<b>A. Attachment # or Permit Condition #:</b> <b>Section 7 – Attachment PO00015PC3-rev351</b>	<b>D. Frequency of monitoring:</b> <b>Monthly</b>
<b>B. Description: 2X Papermachine Hot Air Furnace and “Yankee” Hood Furnace Furnaces Requirements</b>  Condition 1 – NOx < 0.08 lb/MMBTU, CO < 0.045 lb/MMBTU Condition 2 – Fuel and air settings locked as specified in permit. Settings recorded every 6 months Condition 3 – Source test using ARB Method 100 for NOx, CO and O2. Notification & Test Protocol to District 15 days in advance. Report within 45 after test. Condition 4 – Screening Analysis with portable analyzer performed every 24 months	<b>E. Source test reference method:</b>  <b>Source Test Form 4 of 4</b>
<b>C. Method of monitoring:</b> Condition 1, 3, 4 - Emissions testing of the 40 MMBtu/hr “Yankee Hood” furnace was completed on 9/14/2010 and consisted of Source Testing which is superior to Analyzer testing. Notifications and results supplied to District as required. The 70 MMBTU/hr Predryer Furnace is due to be tested before 3/13/2013 as specified in permit. Condition 2 – Fuel Linkage setting monitored and recorded every 6 months	<b>F. Currently in Compliance? Y</b>  <b>G. Compliance Status: I</b>  <b>H. *Excursions, exceedances, or other non-compliance: Y</b>  See Deviation Summary: page 2 of 2

<b>A. Attachment # or Permit Condition #:</b> <b>Section 7 – Attachment PO00015PC4 –rev351</b>	<b>D. Frequency of monitoring:</b> <b>Monthly</b>
<b>B. Description: Flue Gas Recirculation (FGR) Requirements for Babcock &amp; Wilcox Steam Boiler</b>  Condition 1.a-b – FGR system settings locked (physically pinned) in place per permit specifications. Parameters to be monitored, measured, and recorded on monthly basis.	<b>E. Source test reference method</b>  <b>N/A</b>
<b>C. Method of monitoring:</b> Monthly monitoring of mechanical linkage of fuel and air damper. Linkages are pinned in place.	<b>F. Currently in Compliance? Y</b>  <b>G. Compliance Status: C</b>  <b>H. *Excursions, exceedances, or other non-compliance: N</b>



Ventura County Air  
Pollution Control  
District

## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2010 - December 31, 2010**

<b>A. Attachment # or Permit Condition #:</b> <b>Section 7 – Attachment PO00015PC5-rev351</b>	<b>D. Frequency of monitoring:</b> <b>Monthly</b>
<b>B. Description: Particulate Matter Emission Requirements 1X Paper Machine, 2X Paper Machine, Wet Lapper and Converting Line Rooms</b> Condition 1: 1X PM < 6.75 lbs/hr, 2X PM < 3.99 lbs/hr, Wet Lapper < 0.10 Condition 2: Daily average of hourly readings of scrubber pressure drop and liquor flow rate for 1X, 2X and wet lapper scrubbers. Condition 3.a-e: Daily Record not required for less than full day operation. Excursions to be corrected expeditiously, meters and gauges maintained per facility plan, and made available upon request. Excursions require summary of corrective actions. Semi annual report of Excursions. Condition 4.a-b: PM emissions < Rule 52 & 53 table limit Condition 5: Compliance with Rule 52 & 53 achieved with compliance with Condition 1 and 2 Condition 6: Converting room emissions shall be re-circulated back into room	<b>E. Source test reference method</b>  <b>N/A</b>
<b>C. Method of monitoring:</b> Condition 1-2, 4-5: 1X, 2X, and Wet Lapper Scrubber operation to ensure Pressure Drop, and Liquor Flow Rate are not less than the permit specified values. Condition 3 –Records of Hourly and Daily operation kept. Excursion correction and summaries documented. Semi annual report submitted. Condition 6 – Converting Room emissions are circulated back into room via duct work maintained by plant personnel.	<b>F. Currently in Compliance? Y</b>  <b>G. Compliance Status: C</b>  <b>H. *Excursions, exceedances, or other non-compliance: N</b>

<b>A. Attachment # or Permit Condition #:</b> <b>Section 7 – Attachment PO00015PC6-rev351</b>	<b>D. Frequency of monitoring:</b> <b>Monthly</b>
<b>B. Description: ROC Emission Requirements Manufacturing Chemicals for Ink and Additive Applications</b> Condition 1 – Inks and additives facility 12 month rolling average ROC limit Condition 2 – Maintain monthly record of ROC emissions for process additives usage	<b>E. Source test reference method</b>  <b>N/A</b>
<b>C. Method of monitoring:</b> Condition 1 – Facility ROC emissions rates are recorded and tracked to ensure 12 month rolling totals maintained below 60 TPY Condition 2 – Maintain monthly usage data for ROC containing chemicals	<b>F. Currently in Compliance? Y</b>  <b>G. Compliance Status: C</b>  <b>H. *Excursions, exceedances, or other non-compliance: N</b>



Ventura County Air  
Pollution Control  
District

## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2010 - December 31, 2010**

<b>A. Attachment # or Permit Condition #:</b> <b>Section 7 – Attachment PO00015PC7-rev291</b>	<b>D. Frequency of monitoring:</b> <b>Monthly</b>
<b>B. Description: Federal PSD Permit Requirements- Cogeneration Turbine (LM-6000), Cogeneration Turbine (LM-2500), Babcock &amp; Wilcox Steam Boiler, 1X Paper Machine Hot Air Furnace, and 1X Papermachine “Yankee” Hood Furnace</b> Condition 1 – If request increase in permitted NOx emissions for combustions sources above 250 TPY, submit PSD application for LM6000 turbine	<b>E. Source test reference method</b>  <b>N/A</b>
<b>C. Method of monitoring:</b> Condition 1 – If request increase in NOx emissions in excess of 250 TPY, will submit PSD application for LM6000 turbine.	<b>F. Currently in Compliance? Y</b>  <b>G. Compliance Status: C</b>  <b>H. *Excursions, exceedances, or other non-compliance: N</b>

<b>A. Attachment # or Permit Condition #:</b> <b>Section 7 – Attachment PO00015PC8</b>	<b>D. Frequency of monitoring:</b> <b>Monthly</b>
<b>B. Description: ERC Certificate No. 1166</b> Condition 1 – All motor vehicle parking and traffic on paved surfaces only. No unpaved areas readily accessible by vehicle. Except for emergencies, construction, maintenance and agricultural use.	<b>E. Source test reference method</b>  <b>N/A</b>
<b>C. Method of monitoring:</b> Condition 1 – Access to unpaved areas is restricted. Signs indicating prohibition for parking, and travel over unpaved areas are posted throughout site. Parking and traffic expectations communicated to facility and enforced by facility personnel	<b>F. Currently in Compliance? Y</b>  <b>G. Compliance Status: C</b>  <b>H. *Excursions, exceedances, or other non-compliance: N</b>

# **Permit Section: 8**

General Applicable Requirements (Attachments)



Ventura County Air  
Pollution Control  
District

## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2010 - December 31, 2010**

<b>A. Attachment # or Permit Condition #:</b> <b>Section 8 – Attachment Rule 50 (04/13/04)</b>	<b>D. Frequency of monitoring:</b> <b>Monthly</b>
<b>B. Description: Opacity</b> Condition 1 – 3 Minute emissions in hour less than 20% Opacity Condition 2 – Routine Surveillance and record of visible emissions Condition 3 – Annual compliance certification, including site survey Condition 4 – EPA Method 9 survey per District request	<b>E. Source test reference method</b>  <p style="text-align: center;"><b>N/A</b></p>
<b>C. Method of monitoring:</b> Condition 1 & 2 – No instances of >20% Opacity nor >No. 1 on the Ringelmann Chart were discovered during periodic surveillance of emissions. Condition 3 – Visible emissions survey conducted on June 16, 2010.	<b>F. Currently in Compliance?</b> <p style="text-align: center;"><b>Y</b></p>
	<b>G. Compliance Status: C</b>
	<b>H. *Excursions, exceedances, or other non-compliance: N</b>

<b>A. Attachment # or Permit Condition #:</b> <b>Section 8 – Attachment 54.B.1</b>	<b>D. Frequency of monitoring:</b> <b>Monthly</b>
<b>B. Description: Sulfur Compounds – Sulfur Emissions from Combustion Operations at Point</b> Condition 1 – Point of Discharge SO <sub>2</sub> concentrations < 300 ppmvd, from combustion operation Condition 2 – Comply with fuel Sulfur content limits per Rule 64. No monitoring required. Condition 3 – Upon District Request determine point of Discharge concentrations of SO <sub>2</sub>	<b>E. Source test reference method</b>  <p style="text-align: center;"><b>N/A</b></p>
<b>C. Method of monitoring:</b> Condition 1 – Compliance with permit condition Attachment P00015PC2. Only PUC-quality natural gas and CARB approved diesel used on site in 2010 Conditions 2 – Fuel Oil Sulfur Content provided by supplier at each delivery. Gaseous sulfur content meeting PUC Quality requirements. Data furnished to district upon request. Condition 3 – Furnish District with data upon request.	<b>F. Currently in Compliance?</b> <p style="text-align: center;"><b>Y</b></p>
	<b>G. Compliance Status: C</b>
	<b>H. *Excursions, exceedances, or other non-compliance: N</b>



Ventura County Air  
Pollution Control  
District

## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2010 - December 31, 2010**

<b>A. Attachment # or Permit Condition #:</b> <b>Section 8 - Attachment 54.B.2</b>	<b>D. Frequency of monitoring:</b> <b>Monthly</b>
<b>B. Description: Sulfur compounds – SO2 Concentrations.</b> Condition 1 – Property Line SO2 concentrations: 1 hr < 0.25 ppmvd, 24 hr < 0.04 ppmvd Condition 2 – Provide fuel or exhaust analysis to District upon request Condition 3a-c – Upon District Request determine ground level concentrations of SO2	<b>E. Source test reference method</b>  <p style="text-align: center;"><b>N/A</b></p>
<b>C. Method of monitoring:</b> Condition 1 - Compliance with permit condition Attachment P00015PC2. Only PUC-quality natural gas, and CARB approved diesel used on site in 2010 Conditions 2 – Fuel Analysis provided by suppliers at request of facility. Exhaust analysis based on emissions factors incorporated into facility AB2588 Health Risk Assessment. Condition 3 – Furnish District with data upon request.	<b>F. Currently in Compliance?</b> <p style="text-align: center;"><b>Y</b></p> <b>G. Compliance Status: C</b>  <b>H. *Excursions, exceedances, or other non-compliance: N</b>

<b>A. Attachment # or Permit Condition #:</b> <b>Section 8 – Attachment 55</b>	<b>D. Frequency of monitoring:</b> <b>Monthly</b>
<b>B. Description: Fugitive Dust</b> Condition 1 – Do not cause or allow fugitive dust such that is visible past the property line. Condition 2 – Do not cause or allow fugitive dust to cause 20% opacity as measured by EPA Method 9 using Rule 55 modifications. Condition 3 – Do not allow “track-out” to extend ≥25ft unless control measures are utilized Condition 4 - Remove all “track-out” at the conclusion of each workday or evening shift Condition 5 - Comply with specific activity requirements for earth moving, bulk material handling, and truck hauling activities Condition 6- Comply with specific record keeping requirements for each type of activity Condition 7 - Annually certify that all applicable source of dust are in compliance or certify that there are no operations, disturbed surface areas, or man made conditions that are subject to Rule 55.	<b>E. Source test reference method</b>  <p style="text-align: center;"><b>N/A</b></p>
<b>C. Method of monitoring:</b> Condition 1-2– Outdoor projects are controlled and monitored such that Conditions 1-2 are met. Condition 3 – Site property is such that the possibility of track out is minimized. For projects where the possibility of track out exists – vehicles are inspected and managed to prevent track out. Condition 4 – When applicable, Track Out is removed at the conclusion of each workday or shift. Condition 5 – Site utilizes procedures and methods for prevent fugitive dust. Condition 6 – When required records are kept. Condition 7 – Ongoing assessment of site activity to ensure Rule 55 compliance.	<b>F. Currently in Compliance?</b> <p style="text-align: center;"><b>Y</b></p> <b>G. Compliance Status: C</b>  <b>H. *Excursions, exceedances, or other non-compliance: N</b>



Ventura County Air  
Pollution Control  
District

## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2010 - December 31, 2010**

<b>A. Attachment # or Permit Condition #:</b> <b>Section 8 – Attachment 57.1 (01/11/05)</b>	<b>D. Frequency of monitoring:</b> <b>Monthly</b>
<b>B. Description: Particulate Matter Emissions from Fuel Burning Equipment</b> Condition 1 – PM shall not exceed 0.12 lbs/MMbtu Condition 2 – Compliance demonstration required upon district request Condition 3 – Periodic monitoring not required. Certify compliance by referring to District Rule 57.B analysis dated 12/3/97	<b>E. Source test reference method</b>  <p style="text-align: center;"><b>N/A</b></p>
<b>C. Method of monitoring:</b> Condition 1 – Satisfy Conditions 2 & 3 of this attachment. Condition 2 – Monitoring not required based on district analysis (Per comments in permit, Table 1.C.3, Condition 57.1) Condition 3 – Periodic monitoring not required. Compliance certified via District analysis of Rule 57.B, dated 12/3/97.	<b>F. Currently in Compliance?</b> <p style="text-align: center;"><b>Y</b></p>
	<b>G. Compliance Status: C</b>
	<b>H. *Excursions, exceedances, or other non-compliance: N</b>

<b>A. Attachment # or Permit Condition #:</b> <b>Section 8 – Attachment 64.B.1 (04/13/99)</b>	<b>D. Frequency of monitoring:</b> <b>Monthly</b>
<b>B. Description: Sulfur Content of Fuels – Gaseous Fuel Requirements</b> Condition 1 – Gaseous Fuel sulfur compounds < 788 ppmvd Condition 2 – Periodic Monitoring not required if using PUC Natural Gas Condition 3 – Analyze fuel if using non PUC quality fuel Condition 4a-b – Landfill or oilfield gaseous fuel usage monitoring	<b>E. Source test reference method</b>  <p style="text-align: center;"><b>N/A</b></p>
<b>C. Method of monitoring:</b> Conditions 1-4: Maintain records showing that only PUC Quality natural gas is used, therefore no other monitoring is required. Facility does not use landfill or oilfield gaseous fuel.	<b>F. Currently in Compliance?</b> <p style="text-align: center;"><b>Y</b></p>
	<b>G. Compliance Status: C</b>
	<b>H. *Excursions, exceedances, or other non-compliance: N</b>



Ventura County Air  
Pollution Control  
District

## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2010 - December 31, 2010**

<b>A. Attachment # or Permit Condition #:</b> <b>Section 8 – Attachment 64.B.2 (04/13/99)</b>	<b>D. Frequency of monitoring:</b> <b>Monthly</b>
<b>B. Description: Sulfur Content of Fuels – Liquid Fuel Requirements</b> Condition 1 – No liquid Fuel usage with sulfur content > 0.5% by weight Condition 2 – If only use ARB quality liquid fuel compliance is assured without monitoring Condition 3 – Requirements for use of non ARB liquid fuels	<b>E. Source test reference method</b>  <p style="text-align: center;"><b>N/A</b></p>
<b>C. Method of monitoring:</b> Conditions 1 & 2 – Maintain records of exclusive use of ARB compliant liquid fuel used on site in 2010– No other monitoring is required. Condition 3 – Monitor per permit requirements if use non ARB quality liquid fuel	<b>F. Currently in Compliance?</b> <p style="text-align: center;"><b>Y</b></p> <b>G. Compliance Status: C</b>
	<b>H. *Excursions, exceedances, or other non-compliance:</b> <b>N</b>

<b>A. Attachment # or Permit Condition #:</b> <b>Section 8 – Attachment 74.11.1</b>	<b>D. Frequency of monitoring:</b> <b>Monthly</b>
<b>B. Description: Large Water Heaters and Small Boilers</b> Condition 1.a-b: Requirements for certified NOx emissions for 75-400 MBTU/hr heaters and boilers. Condition 2.a-b: Requirements for certified NOx emissions for 400-2,000 MBTU/hr heaters and boilers. Condition 3 – Maintain permit specified records for heaters and boilers that are 75-2,000 MBTU/hr Condition 4 – Annual Compliance certification and survey of heaters and boilers that are 75-2,000 MBTU/hr	<b>E. Source test reference method</b>  <p style="text-align: center;"><b>N/A</b></p>
<b>C. Method of monitoring:</b> Conditions 1-4: Facility does not presently utilize Heaters or Boilers that are rated at 75 – 2,000 MBTU/hr, thus facility is not subject to equipment certification, recordkeeping, and annual survey requirements	<b>F. Currently in Compliance?</b> <p style="text-align: center;"><b>Y</b></p> <b>G. Compliance Status: C</b>
	<b>H. *Excursions, exceedances, or other non-compliance:</b> <b>N</b>





Ventura County Air  
Pollution Control  
District

## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2010 - December 31, 2010**

<b>A. Attachment # or Permit Condition #:</b> <b>Section 8 – Attachment 74.22</b>	<b>D. Frequency of monitoring:</b> <b>Monthly</b>
<b>B. Description: Natural Gas-Fired Fan-Type Central Furnaces</b> Condition 1.a-b: New fan type central furnaces require NOx < 40ng per Joule Output Condition 2: Maintain list of fan types with permit specified data Condition 3: Annual survey of fan furnaces	<b>E. Source test reference method</b>  <p style="text-align: center;"><b>N/A</b></p>
<b>C. Method of monitoring:</b> Conditions 1–3: Facility has not previously nor currently operates any Fan-type Central Furnaces on site, thus is not subject to equipment certification, recordkeeping and annual survey requirements.	<b>F. Currently in Compliance?</b> <p style="text-align: center;"><b>Y</b></p>
	<b>G. Compliance Status: C</b>
	<b>H. *Excursions, exceedances, or other non-compliance: N</b>

<b>A. Attachment # or Permit Condition #:</b> <b>Section 6 &amp; 8 – Attachment 74.6 (11/11/03)</b>	<b>D. Frequency of monitoring:</b> <b>Monthly</b>
<b>B. Description: Surface Cleaning and Degreasing</b> Condition 1.a-c: Limitations on use of solvents in surface cleaning. Electronics cleaning solvent < 900 g/l ROC & < 33 mmHg partial pressure. Other cleaning solvents < 25 g/l as applied. Condition 2.a-d: If use solvents > 25 g/l ROC use indicated methods: Wipe cleaning; closed container dispensing of less than 1 liter; flow, dip, or flush with solvent collection; enclosed gun washer. Condition 3: No leaks from solvent containing equipment or containers. Condition 4: No solvents shall be solicited, supplied, sold, or used that would violate Rule 74.6. Condition 5: Use less than one gallon of halogenated solvents per week for cold cleaning. If use maintain records. Condition 6: Solvent stored in non-absorbent containers and closed except for filling or emptying. Condition 7: Dispose of solvents and solvent residues as California Hazardous Waste. Condition 8.a-f: Cold Cleaning equipment requirements, except for non-remote reservoir. Condition 9.a-e: Remote Reservoir equipment requirements. Condition 10.a-g: Cold Cleaner operating requirements. Condition 11.a-h, 12.a-o, 13: Rule 74.6 exemptions. Condition 14.a-d: Solvent Material recordkeeping requirements made available to District upon request. Condition 15: Maintain records and perform routine surveillance of solvent cleaning activities per Conditions 1-14. Upon district Request demonstrate compliance per permit requirements.	<b>E. Source test reference method</b>  <p style="text-align: center;"><b>N/A</b></p>
<b>C. Method of monitoring:</b> Conditions 1–4, 6-7: Compliance for permit conditions pertaining to solvent storage and handling is satisfied via personnel training and observation. Chemical Approval System ensures conformity with solvent ROC content limits. Condition 5: Facility does not use halogenated cold cleaner solvents Conditions 8-10: Cold cleaners are exempt per section 5 of our permit. Condition 11: Exempted Solvents maintained on list per Section 7, PC1.C2 Condition 14: Recordkeeping per permit requirements. Condition 15: Visual surveillance performed routinely. Site uses chemical approval process to confirm that only ROC content acceptable solvents are purchased and used on site.	<b>F. Currently in Compliance?</b> <p style="text-align: center;"><b>Y</b></p>
	<b>G. Compliance Status: C</b>
	<b>H. *Excursions, exceedances, or other non-compliance: N</b>

# **Permit Section: 9**

General Requirements for Short-Term Activities (Attachments)



Ventura County Air  
Pollution Control  
District

## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2010 - December 31, 2010**

<b>A. Attachment # or Permit Condition #:</b> <b>Section 9 – Attachment 74.1 (10/01/02)</b>	<b>D. Frequency of monitoring: Monthly</b>
<b>B. Description: Abrasive Blasting</b> Condition 1.a-c: Abrasive Blasting shall be conducted indoors, using specified methods Condition 2.a-d: For Outdoor blasting use steel or iron shot/grit or utilize specified alternate methods Condition 3 – Adhere to Rule 74.1.B.2 requirements for pavement marking Condition 4 – Stucco and concrete blasting per Rule 74.1.B.3 Condition 5 – Use California approved and labeled materials for abrasive blasting Condition 6 – Comply with visible emissions standard per rule 74.1.C.2 Condition 7.a-e: Routine Surveillance and visual inspection of blasting operations. Surveillance to include permit specified recordkeeping.	<b>E. Source test reference method</b>  N/A
<b>C. Method of monitoring:</b> Condition 1 – Utilize enclosed particulate capture system for indoor abrasive blasting. Condition 2 – Use of approved materials/methods for outdoor blasting directed by written instructions. Conditions 3-4 -Pavement marking, stucco, and concrete not performed on site, however process is in place, via written instructions to adhere to rule 74.1 requirements for abrasive blasting operations. Condition 5 – Use of California approved materials verified by site environmental resources. Condition 6 – Work process for outdoor blasting conforms to visible emission standards. Condition 7 – Records of Abrasive blasting surveillance maintained by Site Environmental Leader. Indoor blasting conducted in sealed cabinet with filtered exhaust, such that visible emissions to atmosphere are not possible.	<b>F. Currently in Compliance?</b> <div style="text-align: center; font-weight: bold;">Y</div> <b>G. Compliance Status: C</b>  <b>H. *Excursions, exceedances, or other non-compliance: N</b>

<b>A. Attachment # or Permit Condition #:</b> <b>Section 9 – Attachment 74.2 (01/01/04)</b>	<b>D. Frequency of monitoring: Monthly</b>
<b>B. Description: Architectural Coatings</b> Condition 1.a-c: VOC Coating content limits, less water and exempt OC's, Flat <100 g/l; Nonflat <150 g/l; Nonflat High Gloss <250 g/l Condition 2 – Specialty coatings shall conform with Rule 74.2 Table of Standards. Industrial Maintenance <250 g/l less water & exempt OC's Condition 3 – Architectural coatings and cleaning materials to remain closed except when in use. Condition 4 – Adhere to Rule 74.2.B.1 thinning requirements Condition 5 – Routine Surveillance of architectural coating operations. Maintain VOC data on coatings used, and submit to district upon request Condition 6 – VOC content and other properties measured per procedures in Rule 74.2.G	<b>E. Source test reference method</b>  N/A
<b>C. Method of monitoring:</b> Condition 1, 2 – All paints used at facility are reviewed for compliance prior to approval for use. Condition 3 – Closure requirements are documented /training provided to all site personnel and contractors. Condition 4 – Paints are used as supplied by vendor. Condition 5 – Visual observations occur routinely. VOC data maintained for each coating via vendor supplied MSDS. Data will be furnished to District upon request. Condition 6 – Architectural coating properties determined using vendor supplied data.	<b>F. Currently in Compliance?</b> <div style="text-align: center; font-weight: bold;">Y</div> <b>G. Compliance Status: C</b>  <b>H. *Excursions, exceedances, or other non-compliance: N</b>



Ventura County Air  
Pollution Control  
District

## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2010 - December 31, 2010**

<b>A. Attachment # or Permit Condition #:</b> <b>Section 9 – Attachment 74.28</b>	<b>D. Frequency of monitoring:</b> Monthly
<b>B. Description: Asphalt Roofing Operations</b> Condition 1 – Kettles shall operate with lids. Lid will not be opened unless temperature is < 150oF Condition 2 – Max Temperatures: Asphalt < 500oF, Coal tar pitch < 400oF Condition 3 – Lid to remained closed, and receiving containers to be covered Condition 4 – Kettle vents to remain closed at all times Condition 5 – Facility will verify Rule 74.28 requirements met during projects	<b>E. Source test reference method</b>  N/A
<b>C. Method of monitoring:</b> Conditions 1-5: Internal administrative procedures. Roofing performed in 2009 used Burmastic Cold Roofing Process	<b>F. Currently in Compliance?</b> <div style="text-align: right;">Y</div> <b>G. Compliance Status:</b> C
	<b>H. *Excursions, exceedances, or other non-compliance:</b> N

<b>A. Attachment # or Permit Condition #:</b> <b>Section 9 - Attachment 40 CFR 61.M</b>	<b>D. Frequency of monitoring:</b> Monthly
<b>B. Description: National Emissions Standards for Asbestos</b> Condition 1 – Comply with 40 CFR part 61, Subpart M Condition 2 – Adhere to 40 CFR part 61.145 requirements for Demolition and Renovation.	<b>E. Source test reference method</b>  N/A
<b>C. Method of monitoring:</b> Condition 1 – Site Asbestos abatement program managed consistent with 40 CFR Part 61, Subpart M. State certified contractors are utilized for ACM demolition and renovation. Adherence with 40 CFR Part 61.145 is mandatory for job approval. Condition 2 – ACM demolition and renovation are observed by site resources to ensure compliance with 40 CFR Part 61.145. Activities involving ACM recorded are filed with Site Environmental Leader. Notification is provided to District prior to ACM renovation or demolition for activities requiring notification.	<b>F. Currently in Compliance?</b> <div style="text-align: right;">Y</div> <b>G. Compliance Status:</b> C
	<b>H. *Excursions, exceedances, or other non-compliance:</b> N



Ventura County Air  
Pollution Control  
District

## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2010 - December 31, 2010**

<b>A. Attachment # or Permit Condition #:</b> <b>Section 10 – District General Part 70 Permit Conditions</b>	<b>D. Frequency of monitoring:</b> Monthly
<b>B. Description: District General Part 70 Permit Conditions</b> Condition 1 – Comply with all federally enforceable conditions, and comply with all applicable requirements already in compliance with. Condition 2 – Comply with new Requirements in a timely manner Condition 3 – Promptly report deviations (within less than 4 hours) Condition 4 – The need to halt / reduce activity is not a defense Condition 5 – Retain all Records for at least 5 years. Condition 6 – All applicable reports submitted to District every 6 months with Responsible Official Certification. Condition 7.a-d: Facilitate permit specified District inspection rights Condition 8 – Permit may be modified, revoked, reopened, reissued or terminated for cause Condition 9.a-d: Permit will be reopened per permit specified reasons Condition 10 – All fees shall be paid on timely basis Condition 11 – Permit does not convey property rights Condition 12 – One invalid term / condition does not invalidate the entire permit Condition 13 – Renewal application must be submitted between 6 to 18 months prior to expiration Condition 14 – Renewal application, and Part 70 requires reports must be certified by a responsible official Condition 15 – Annual Compliance Certification	<b>E. Source test reference method</b>  N/A
<b>C. Method of monitoring:</b> Condition 1-2, 4, 7-9, 11-13: Not applicable - Instructional conditions. Condition 3 – Internal administrative procedures. Condition 5 – Electronic databases and hard copy archives used for 5 year data retention Condition 6 – Reports submitted to district via hand delivery or Certified Mail Condition 10 – Internal Administrative procedures. Records of payments exist. Condition 14-15: Internal Administrative procedures	<b>F. Currently in Compliance?</b>  <b>G. Compliance Status:</b> I  <b>H. *Excursions, exceedances, or other non-compliance:</b>  See Deviation Summaries: page 1 of 2

<b>A. Attachment # or Permit Condition #:</b> <b>Section 10 – Attachment PO General</b>	<b>D. Frequency of monitoring:</b> Monthly
<b>B. Description: General Permit to Operate Conditions</b> Condition 1 – Can petition Hearing Board within 30 days of receiving permit to alter conditions. Condition 2 – Post Permit reasonably close to equipment – Table 2 is sufficient if remainder of permit available elsewhere. Condition 3 – Permit is not transferable to another location. Condition 4 – Permit will be suspended if requested information if not furnished	<b>E. Source test reference method</b>  N/A
<b>C. Method of monitoring:</b> Condition 1 – Reference information only. Condition 2 – Table 2 posted close to equipment and remainder of permit available electronically everywhere in plant. Condition 3 – Permit and sources are not transferred or located in alternate locations. Condition 4 – Information requested by District is furnished within requested time.	<b>F. Currently in Compliance?</b>  Y <b>G. Compliance Status:</b> C  <b>H. *Excursions, exceedances, or other non-compliance:</b> N



Ventura County Air  
Pollution Control  
District

## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2010 - December 31, 2010

<b>A. Attachment # or Permit Condition #:</b> Section 10 – Shield -40CFR 72-78	<b>D. Frequency of monitoring:</b> Monthly
<b>B. Description: Permit Shield – Acid Rain Program</b> Reference Information Only	<b>E. Source test reference method</b> N/A
<b>C. Method of monitoring:</b> Not Applicable - Reference Information only	<b>F. Currently in Compliance?</b> Y
	<b>G. Compliance Status:</b> C
	<b>H. *Excursions, exceedances, or other non-compliance:</b> N

<b>A. Attachment # or Permit Condition #:</b> Section 10 – Shield 60 KKKK -	<b>D. Frequency of monitoring:</b> Monthly
<b>B. Description: Permit Shield – Standards of Performance for Stationary Combustion Turbines</b> Reference Information Only	<b>E. Source test reference method</b> N/A
<b>C. Method of monitoring:</b> Not Applicable - Reference Information only	<b>F. Currently in Compliance?</b> Y
	<b>G. Compliance Status:</b> C
	<b>H. *Excursions, exceedances, or other non-compliance:</b> N

<b>A. Attachment # or Permit Condition #:</b> Section 10 – Shield YYYY	<b>D. Frequency of monitoring:</b> Monthly
<b>B. Description: Permit Shield – NESHAPs</b> Reference Information Only	<b>E. Source test reference method</b> N/A
<b>C. Method of monitoring:</b> Not Applicable - Reference Information only	<b>F. Currently in Compliance?</b> Y
	<b>G. Compliance Status:</b> C
	<b>H. *Excursions, exceedances, or other non-compliance:</b> N

# **Permit Section: 11**

Miscellaneous Federal Program Conditions



Ventura County Air  
Pollution Control  
District

## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2010 - December 31, 2010**

<b>A. Attachment # or Permit Condition #:</b> <b>Section 11 – Attachment 40CFR68</b>	<b>D. Frequency of monitoring: Monthly</b>
<b>B. Description: Accidental Release Prevention and Risk Management Plans</b> Condition 1 – Should facility become subject to 40 CFR Part 68, then must submit Risk Management Plan and provide annual certification	<b>E. Source test reference method</b>  N/A
<b>C. Method of monitoring:</b> Condition 1– Threshold Quantity calculations used to determine applicability of 40 CFR Part 68, in addition to administrative storage quantity restrictions.	<b>F. Currently in Compliance? Y</b>
	<b>G. Compliance Status: C</b>
	<b>H. *Excursions, exceedances, or other non-compliance: N</b>

<b>A. Attachment # or Permit Condition #:</b> <b>Section 11 – Attachment 40CFR82</b>	<b>D. Frequency of monitoring: Monthly</b>
<b>B. Description: Protection of Stratospheric Ozone</b> Condition 1 – Subject to 40 CFR part 82, Subpart B if perform service on motor (fleet) vehicles Condition 2 – Subject to 40 CFR Part 82, Subpart F, if perform maintenance on, services, or dispose of appliances	<b>E. Source test reference method</b>  N/A
<b>C. Method of monitoring:</b> Condition 1– Facility does not maintain or otherwise service fleet vehicles at facility. Not subject to requirements specified in permit condition. Condition 2 – Internal administrative procedures to implement and manage applicable 40 CFR Part 82 requirements.	<b>F. Currently in Compliance? Y</b>
	<b>G. Compliance Status: C</b>
	<b>H. *Excursions, exceedances, or other non-compliance: N</b>



# Permit Section: 12

Part 70 Permit Application Package

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

# Source Tests

Part 70 Permit Application Package



Ventura County  
Air Pollution  
Control District

## ANNUAL COMPLIANCE CERTIFICATION

### SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 01/01/2010 to 12/31/2010

A. Emission Unit Description: <b>B-301 Boiler</b>			B. Pollutant: <b>NOx</b>
C. Measured Emission Rate: <b>24.50 ppm @ 3% O2</b>	D. Limited Emission Rate: <b>40 ppm @ 3% O2</b>	E. Specific Source Test or Monitoring Record Citation: <b>P27-036-FR 301</b>	F. Test Date: <b>March 25, 2010</b>

A. Emission Unit Description: <b>B-301 Boiler</b>			B. Pollutant: <b>CO</b>
C. Measured Emission Rate: <b>11.60 ppm @ 3% O2</b>	D. Limited Emission Rate: <b>400 ppm @ 3% O2</b>	E. Specific Source Test or Monitoring Record Citation: <b>P27-036-FR 301</b>	F. Test Date: <b>March 25, 2010</b>



Ventura County  
Air Pollution  
Control District

## ANNUAL COMPLIANCE CERTIFICATION

### SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 01/01/2010 to 12/31/2010

A. Emission Unit Description: <b>LM6000 turbine</b>			B. Pollutant: <b>NOx</b>
C. Measured Emission Rate: <b>1.76 ppm @ 15% O2</b>	D. Limited Emission Rate: <b>2.5 ppm @ 15% O2</b>	E. Specific Source Test or Monitoring Record Citation: <b>P27-036-FR COMP &amp; RATA</b>	F. Test Date: <b>March 2-3, 2010</b>

A. Emission Unit Description: <b>LM6000 turbine</b>			B. Pollutant: <b>CO</b>
C. Measured Emission Rate: <b>4.87 lb/hr</b>	D. Limited Emission Rate: <b>N/A</b>	E. Specific Source Test or Monitoring Record Citation: <b>P27-036-FR COMP &amp; RATA</b>	F. Test Date: <b>March 2-3, 2010</b>

A. Emission Unit Description: <b>LM6000 turbine</b>			B. Pollutant: <b>O2</b>
C. Measured Emission Rate: <b>15.00%</b>	D. Limited Emission Rate: <b>N/A</b>	E. Specific Source Test or Monitoring Record Citation: <b>P27-036-FR COMP &amp; RATA</b>	F. Test Date: <b>March 2-3, 2010</b>

A. Emission Unit Description: <b>LM6000 turbine</b>			B. Pollutant: <b>Heat Rate</b>
C. Measured Emission Rate: <b>452.80 MMBtu/Hr</b>	D. Limited Emission Rate: <b>N/A</b>	E. Specific Source Test or Monitoring Record Citation: <b>P27-036-FR COMP &amp; RATA</b>	F. Test Date: <b>March 2-3, 2010</b>

A. Emission Unit Description: <b>LM6000 turbine</b>			B. Pollutant: <b>NH3</b>
C. Measured Emission Rate: <b>.45 ppm @ 15% O2</b>	D. Limited Emission Rate: <b>2.0 ppm @ 15% O2</b>	E. Specific Source Test or Monitoring Record Citation: <b>P27-036-FR COMP &amp; RATA</b>	F. Test Date: <b>March 2-3, 2010</b>

A. Emission Unit Description: <b>LM6000 turbine</b>			B. Pollutant: <b>ROC</b>
C. Measured Emission Rate: <b>.30 @ 15% O2</b>	D. Limited Emission Rate: <b>2.0 ppm @ 15% O2</b>	E. Specific Source Test or Monitoring Record Citation: <b>P27-036-FR COMP &amp; RATA</b>	F. Test Date: <b>March 2-3, 2010</b>



Ventura County  
Air Pollution  
Control District

# ANNUAL COMPLIANCE CERTIFICATION

## SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: **01/01/2010 to 12/31/2010**

A. Emission Unit Description: <b>LM2500 turbine</b>			B. Pollutant: <b>NOx</b>
C. Measured Emission Rate: <b>22.00 ppm @ 15% O2</b>	D. Limited Emission Rate: <b>24 ppm @ 15% O2</b>	E. Specific Source Test or Monitoring Record Citation: <b>Horizon Test #: P27-036</b>	F. Test Date: <b>May 14, 2010</b>

A. Emission Unit Description: <b>LM2500 turbine</b>			B. Pollutant: <b>CO</b>
C. Measured Emission Rate: <b>39.00 lb/hr</b>	D. Limited Emission Rate: <b>54.98 lb/hr</b>	E. Specific Source Test or Monitoring Record Citation: <b>Horizon Test #: P27-036</b>	F. Test Date: <b>May 14, 2010</b>

A. Emission Unit Description: <b>LM2500 turbine</b>			B. Pollutant: <b>O2</b>
C. Measured Emission Rate: <b>14.51%</b>	D. Limited Emission Rate: <b>N/A</b>	E. Specific Source Test or Monitoring Record Citation: <b>Horizon Test #: P27-036</b>	F. Test Date: <b>May 14, 2010</b>

A. Emission Unit Description: <b>LM2500 turbine</b>			B. Pollutant: <b>Heat Rate</b>
C. Measured Emission Rate: <b>243.00 MMBtu/Hr</b>	D. Limited Emission Rate: <b>N/A</b>	E. Specific Source Test or Monitoring Record Citation: <b>Horizon Test #: P27-036</b>	F. Test Date: <b>May 14, 2010</b>



Ventura County  
Air Pollution  
Control District

## ANNUAL COMPLIANCE CERTIFICATION

### SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 01/01/2010 to 12/31/2010

A. Emission Unit Description: <b>2X Predryer Hot Air Furnace (70Mmbtu /hr)</b>			B. Pollutant: <b>NOx</b>
C. Measured Emission Rate: <b>0.014 lbs/Mmbtu</b>	D. Limited Emission Rate: <b>0.080 lbs/Mmbtu</b>	E. Specific Source Test or Monitoring Record Citation: <b>P27-025</b>	F. Test Date: <b>September 14<sup>th</sup>, 2006</b>

A. Emission Unit Description: <b>2X Predryer Hot Air Furnace (70Mmbtu /hr)</b>			B. Pollutant: <b>CO</b>
C. Measured Emission Rate: <b>0.002 lbs/Mmbtu</b>	D. Limited Emission Rate: <b>0.045 lbs/Mmbtu</b>	E. Specific Source Test or Monitoring Record Citation: <b>P27-025</b>	F. Test Date: <b>September 14<sup>th</sup>, 2006</b>

A. Emission Unit Description: <b>2X Predryer Hot Air Furnace (70Mmbtu /hr)</b>			B. Pollutant: <b>O2</b>
C. Measured Emission Rate: <b>15.21%</b>	D. Limited Emission Rate: <b>N/A</b>	E. Specific Source Test or Monitoring Record Citation: <b>P27-025</b>	F. Test Date: <b>September 14<sup>th</sup>, 2006</b>

A. Emission Unit Description: <b>2X Yankee Hot Air Furnace (40 Mmbtu/hr)</b>			B. Pollutant: <b>NOx</b>
C. Measured Emission Rate: <b>0.01 lbs/Mmbtu</b>	D. Limited Emission Rate: <b>0.080 lbs/Mmbtu</b>	E. Specific Source Test or Monitoring Record Citation: <b>P27-039-FR</b>	F. Test Date: <b>September 28<sup>th</sup>, 2010</b>

A. Emission Unit Description: <b>2X Yankee Hot Air Furnace (40 Mmbtu/hr)</b>			B. Pollutant: <b>CO</b>
C. Measured Emission Rate: <b>0.011 lbs/Mmbtu</b>	D. Limited Emission Rate: <b>0.045 lbs/Mmbtu</b>	E. Specific Source Test or Monitoring Record Citation: <b>P27-039-FR</b>	F. Test Date: <b>September 28<sup>th</sup>, 2010</b>

A. Emission Unit Description: <b>2X Yankee Hot Air Furnace (40 Mmbtu/hr)</b>			B. Pollutant: <b>O2</b>
C. Measured Emission Rate: <b>14.18%</b>	D. Limited Emission Rate: <b>N/A</b>	E. Specific Source Test or Monitoring Record Citation: <b>P27-039-FR</b>	F. Test Date: <b>September 28<sup>th</sup>, 2010</b>

# Deviations

Part 70 Permit Application Package



Ventura County Air  
Pollution Control  
District

## ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

**Period Covered by Compliance Certification: January 1, 2010 - December 31, 2010**

<b>A. Attachment # or Permit Condition #:</b> Section 6 – Attachment STRMLN15LM2500-NOx,CO- rev351  Condition 5: CEMs calibration and maintenance per 40 CFR, part 51, Appendix P, Sections 3.0 through 3.9.5	<b>B. Equipment description:</b> Deviation specific to NIST standard for NOx Calibration gases as specified in District memo	<b>C. Deviation Period:</b> Date: 1/1/2010-1/19/2010 Begin Time: 1/1/2010 0:00 End Time: 1/19/2010 6:21  <b>When Discovered</b> Date: 3/1/2010 Time: 7:45
<b>D. Parameters monitored:</b> 11/24/09 VCAPCD Memo, Subject: Use of EPA Protocol Gas Components for Nitrogen Oxides Calibration	<b>E. Limit:</b> <p style="text-align: center;">NA</p>	<b>F. Actual:</b> <p style="text-align: center;">NA</p>
<b>G. Probable Cause of Deviation:</b>  The cylinder was put into service prior to new rule effective date		<b>H. Corrective actions taken:</b>  District memo requirement was satisfied on 1st cylinder transition on 1/19/2010.  District staff informed on 3/1/2010 during CEMs OND inspection.

<b>A. Attachment # or Permit Condition #:</b>  Section 6 – Attachment STRMLN15LM2500-NOx,CO- rev351 - Condition 1  Part 70 General Requirements - Condition 3	<b>B. Equipment description:</b> Custom Instrumentation Services Corp. (CISCO) System # 10001940  NOx: Rosemont Analytical, Model 951C CO: Siemens, Model Ultramat 5E O2: Siemens, Model Oxymat 5E	<b>C. Deviation Period:</b> Date: 1/23/2010 Begin Time: 7:00 End Time: 7:50  <b>When Discovered</b> Date: 6/17/2010 Time: 8:30
<b>D. Parameters monitored:</b>  <p style="text-align: center;">NOx ppmvd</p>	<b>E. Limit:</b>  <p style="text-align: center;">&lt; 24 ppmvd avg. @ 15% O2 over 3 hr. period</p>	<b>F. Actual:</b> <u>3hr Average:</u> 08:00 - 28.04 ppmvd @ 15% O2
<b>G. Probable Cause of Deviation:</b>  Section 6: A CEMS manual calibration was initiated in the last 5 minutes of a 25 minute Auto Calibration Sequence causing the CEMs monitor to interpret the zero span phase of the Manual Calibration as lack of NOx and shut off the injection water which created an exceedance.  Part 70: The recorded values on the recordkeeping log were reported on the Qtrly CEMS report as being the result of multiple Man Cals in a single hour and not as an exceedance		<b>H. Corrective actions taken:</b>  Section 6: The initiation of 2nd Manual Calibration caused the system reset and returned control of the water injection system.  Part 70: As required the exceedance was reported to the District upon discovery.





Ventura County Air  
Pollution Control  
District

## ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

**Period Covered by Compliance Certification: January 1, 2010 - December 31, 2010**

<b>A. Attachment # or Permit Condition #:</b> Section 6 – Attachment STRMLN15LM6000-NOx- rev291 - Condition 1	<b>B. Equipment description:</b> 49.9 MW GE Natural Gas Cogeneration Turbine LM-6000/ Comertech Model CM-33 SCR with Ammonia Injection	<b>C. Deviation Period:</b> Date: 1/14/2010 Begin Time: 14:52 End Time: 16:09 <b>When Discovered</b> Date: 1/14/2010 Time: 14:52
<b>D. Parameters monitored:</b>  NOx ppmvd	<b>E. Limit:</b>  < 2.5 ppmvd avg. @ 15% O2 over 3 hr. period	<b>F. Actual:</b> <u>3hr Averages:</u> 15:00 - 2.667 ppmvd @ 15% O2 16:00 - 8.097 ppmvd @ 15% O2 17:00 - 2.589 ppmvd @ 15% O2
<b>G. Probable Cause of Deviation:</b>  Relay output card contact in the Distributive Control Systems (DCS) was found to be failed.	<b>H. Corrective actions taken:</b>  Hardwire jumper between the two points for the output contact was placed on the card to re-establish voltage to the system.	

<b>A. Attachment # or Permit Condition #:</b> Section 7 – Attachment PO00015PC3-rev351 - Condition 1	<b>B. Equipment description:</b> 70 MMBTU/Hr NG Coen CO Lo NOx Burner	<b>C. Deviation Period:</b> Date: 9/7/2010 Begin Time: 19:00 End Time: 9/8/2010 11:00 <b>When Discovered</b> Date: 9/8/2010 Time: 11:00
<b>D. Parameters monitored:</b>  Condition 2 - Monitor fuel and air settings	<b>E. Limit:</b>  0.045 lb/MMBTU CO	<b>F. Actual:</b>  >0.045 lb/MMBTU CO
<b>G. Probable Cause of Deviation:</b>  COEN technician incorrectly calibrated furnace	<b>H. Corrective actions taken:</b>  Emission Source was shutdown until issue was resolved.	