



Ventura County  
Air Pollution  
Control District

## RESPONSIBLE OFFICIAL'S CERTIFICATION FORM

Ventura County APCD Rule 33.9 requires that "any document, including reports, schedule of compliance progress reports and compliance certifications, required by a Part 70 permit shall be certified by a responsible official." Therefore, this form shall be signed by the company's Responsible Official and submitted with all such reports, including, but not limited to semi-annual reports, deviation and emergency reports and any periodic reports required by a Part 70 permit. However, when submitting your Annual Compliance Certifications, please use the form titled Annual Compliance Certification Signature Cover Form.

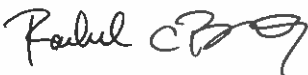
Semi-annual reports, deviations and emergency reports and any periodic reports required by your Part 70 permit should be submitted to:

Ed Swede  
Air Quality Engineer  
Ventura County Air Pollution Control District  
4567 Telephone Road, Second Floor  
Ventura, CA 93003

RECEIVED  
VENTURA COUNTY  
A.P.C.D.  
2023 FEB 13 PM 4:04

### Certification by Responsible Official

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

Signature of Responsible Official:  <small>Please use the Adobe Fill &amp; Sign option to sign (click the 'Sign Here' flag to link to additional instructions)</small>	Date: 2/13/2023
Title of Responsible Official: Plant Manager	
Facility ID: 00015	



Ventura County  
Air Pollution  
Control District

**ANNUAL COMPLIANCE CERTIFICATION  
SIGNATURE COVER FORM**

TV Permit # 00015

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

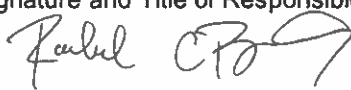
Ms. Roshni Brahmhatt  
Enforcement & Compliance Enforcement Division  
EPA Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

**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.

Signature and Title of Responsible Official:  Title: <u>Plant Manager</u>	Date: <u>2/13/23</u>
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Time Period Covered by Compliance Certification <u>01 / 01 / 22</u> (MM/DD/YY) to <u>12 / 31 / 22</u> (MM/DD/YY)
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# 2022 Reporting Year

## Annual Title V Compliance

For

Procter & Gamble Paper Products Company

Oxnard, California Facility

VCAPCD PERMIT No. 00015

Contact:  
Cindy Stines  
Site Environmental Leader  
805-485-881 X 2408  
[stines.cg@pg.com](mailto:stines.cg@pg.com)

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

February 10, 2023

Mr. Keith Macias  
AQS, Inspector  
Ventura County APCD  
4567 Telephone Road, Second Floor  
Ventura, California 93003

Subject: RY2022 Annual Title V Compliance Certification and Semi-Annual Deviation Report

Mr. Macias:

Enclosed is The Procter & Gamble Paper Products Company's Oxnard facility, Part 70 Permit No. 00015 Compliance Certification for January 1, 2022, through December 31, 2022, reporting period. This submission also constitutes the Semi-Annual Deviation Report for the time period July 1, 2022– Dec 31, 2022.  
There were no deviations during January 1, 2022, to December 31, 2022

I can be reached at 805-485-8871, X 2408 or stines.cg@pg.com should you have any questions about our facilities certification.

Respectfully,

Mrs. Cindy Stines  
Site Environmental Systems Leader

Cc:

Ms. Rachel Buchenroth, Plant Manager, P&G  
Mr. Mario Aguilar, HS&E Leader, P&G  
Ms. Mariah Holcomb, HS&E Leader, P&G  
Ms. Sonja Malek, HS&E Tech Env Eng., P&G

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# **Permit Section: 1**

**T.O.C**

**Permit Revisions Table**

**Permit Summary and Statement of basis. Compliance is not applicable  
to this summary information**

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## **Permit Section: 2**

### **Permitted Equipment and Application Requirements Table**

**This is a summary of requirements**

**Specific and enforceable permit terms and conditions are found in  
other sections of the permit.**

**Compliance is not applicable to this summary information**

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# 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, 2022 - December 31, 2022**

<b>A. Attachment # or Permit Condition #:</b> Section 3 – Permitted Throughput Limits Table 3 (00015-411,431,441)	<b>D. Frequency of monitoring:</b> Monthly
<b>B. Description: Stationary Combustion Engines</b> List of Throughput Permit Limits for Emissions Units	<b>E. Source test reference method</b> N/A
<b>C. Method of monitoring:</b> 12 month rolling totals, based on monthly data for regulated emissions including ROC's are tracked on a monthly basis.	<b>F. Currently in Compliance?</b> YES
	<b>G. Compliance Status:</b> CONTINUOUS
	<b>H. *Excursions, Exceedence, or other non-compliance:</b> NO



# **Permit Section: 4**

## **Permitted Emissions Table**

**This is a summary of requirements**

**Specific and enforceable permit terms and conditions are found in  
other sections of the permit.**

**Compliance Certification is not applicable to this summary  
information**

# **Permit Section: 5**

## **Exempt Equipment List (Insignificant Activities Table)**

**This is a summary of insignificant activities listed in the permit for informational purposes.**

**Compliance Certification is not applicable to this summary information**

# **Permit Section: 6**

**Specific Applicable Requirements (Attachments)**



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## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2022 - December 31, 2022**

<b>A. Attachment # or Permit Condition #:</b> Section 6 - 74.9 N7	<b>D. Frequency of monitoring:</b> <b>Monthly</b>
<b>B. Description: Stationary Combustion Engines</b>  Condition 1 - Emergency or Maintenance Engine Operation <50 hrs/calendar yr  Condition 2- Emergency Engines equipped with operating, non resettable, elapsed hour meters.  Condition 3 - Records for each emergency engine should include: Engine manufacturer, model number, operator identification number and location.  Condition 4 - Report annual hours of maintenance operation to the District annually by Feb 15.	<b>E. Source test reference method</b> <b>N/A</b>
<b>C. Method of monitoring:</b> Condition 1 – Fire/Emergency and Maintenance hr run times tracked in monthly log  Condition 2 – All engines are equipped with a non-resettable hour meter  Condition 3 & 4 - Emergency Diesel Engine Annual Report forms are submitted to the District	<b>F. Currently in Compliance?</b> <b>YES</b> <b>G. Compliance Status:</b> <b>CONTINUOUS</b>  <b>H. *Excursions, Exceedence, or other non-compliance:</b> <b>NO</b>



Ventura County  
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## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2022 - December 31, 2022**

<b>A. Attachment # or Permit Condition #:</b> Section 6 - 74.15 N.1	<b>D. Frequency of monitoring:</b> Biennial
<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 per Section 7	<b>E. Source test reference method:</b> <b>Source Test Summary Form 1 of 4</b>  <b>ARB Method 100:</b> <b>NOx</b> <b>CO</b> <b>Stack Gas O2</b>
<b>C. Method of monitoring:</b> Condition 1 & 2 -3/10/2022 Source Test demonstrated compliance  Condition 3 – Only Natural Gas was used for the 2022 calendar year.  Condition 4 – Instructional Condition; Certification not applicable.  Condition 5 – No alternate fuel utilized. Source Test report furnished to District on time.  Condition 6 – Compliance with applicable Section 7 flue gas recirculation requirements.	<b>F. Currently in Compliance? YES</b>  <b>Continuous</b>  <b>H. *Excursions, Exceedence, or other non-compliance: No</b>



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**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2022 - December 31, 2022**

<p>A. Attachment # or Permit Condition #: Section 6 – Attachment 74.19N1-(6/14/11)</p>	<p>D. Frequency of monitoring: <b>Monthly</b></p>
<p>B. Description: Graphic Arts Operations Without an Emissions Capture and Control System</p> <p>Condition 1: Only use flexographic inks &lt; 225 g/l Condition 2: Fountain Solutions meets specified limits Condition 3: Cleaning using approved ROC content and composite partial pressure Solvents Condition 4: Usage of Methylene Chloride Prohibited Condition 5.a-d: Any solvent cleaning operations must use only 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: <b>Maintain records (monthly) for inks and fountain solution usage</b> Condition 9.a-e: Test Method utilization</p>	<p>E. Source test reference method: <b>N/A</b></p>
<p>C. Method of monitoring: Condition 1 – Chemical Approval Process verifies only &lt;225 g/l ROC content inks are allowed on-site. Condition 2 &amp; 3 – Facility does not use Fountain Solution in Graphic Arts operations; only Solvent free, water based cleaning solution is used. Condition 4 &amp; 5 – <b>Per written procedures, facility utilizes solvent-free cleaning solutions (water).</b> Condition 6 – Visual observation of ROC containing materials in closed containers while in storage. Condition 7 – Facility resources are trained to dispose of 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.</p>	<p>F. Currently in Compliance? <b>YES</b></p> <p>G. Compliance Status: <b>Continuous</b></p> <p>H. *Excursions, Exceedence, or other non-compliance: <b>NO</b></p>



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## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2022 - December 31, 2022**

<p>A. Attachment # or Permit Condition #: Section 6 – Attachment 74.34N2 (12/13/2016)</p>	<p>D. Frequency of monitoring: <b>Monthly</b></p>
<p>B. Description: NOx Reductions from Miscellaneous Sources</p> <p>Condition 1- Perform combustion system maintenance in accordance with manufacturer's written instructions/specifications or according to good engineering practices focused on reliability and emission controls.</p> <p>Condition 2 - Document maintenance activities in a site specific combustion and emission controls systems maintenance plan. The plan must be kept onsite and available to the APCD upon request.</p> <p>Condition 2 - Maintain records of combustion system maintenance and make available to APCD upon request</p>	<p>E. Source test reference method: N/A</p>
<p>C. Method of monitoring: Condition 1 &amp; 2 - Combustion system maintenance was performed for all applicable units in accordance with a site written plan and is available upon request.</p> <p>Condition 3 - Maintenance records including manufacturer's inspection reports for 2022 are on file and available upon request.</p>	<p>F. Currently in Compliance? <b>YES</b></p> <p>G. Compliance Status: <b>CONTINUOUS</b></p> <p>H. *Excursions, Exceedence, or other non-compliance: <b>NO</b></p>



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## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2022 - December 31, 2022**

<b>A. Attachment # or Permit Condition #:</b> Section 6 – Attachment 103N5 (02/09/99)	<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 (CF) for CEMs exemption  Condition 2 – Install CEMs upon request of District  Condition 3 – Maintain monthly fuel consumption records and submit annual capacity factor calculation to demonstrate unit maintains < 30% CF each year.	<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 are documented	<b>F. Currently in Compliance?</b> <b>YES</b>  <b>G. Compliance Status:</b> <b>CONTINUOUS</b>  <b>H. *Excursions, Exceedence, or other non-compliance:</b> <b>NO</b>





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**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2022 - December 31, 2022**

<p><b>A. Attachment # or Permit Condition #:</b> Section 6 – Attachment STRMLN15LM6000-NOx-rev291</p>	<p><b>D. Frequency of monitoring:</b> <b>Monthly</b></p>
<p><b>B. Description: LM6000 Gas Turbine Based Cogeneration Unit</b></p> <p><u>Condition 1, 2, 4, &amp; 6</u> - NOx &lt; 2.5 ppmvd avg. @ 15% O2 over 3 hr. period, Annual Source Test, and CEMs, ROC &lt;2.0 ppmvd @ 15% O2 average over 3 consecutive hrs. Operate Oxidation Catalyst &amp; test annually, Outlet Ammonia &lt; 20 ppmvd verified annually via source test, PM &lt; 3.08 lbs/MMscf &amp; source test using ARB Method 5 upon District request</p> <p><u>Condition 3:</u> Emissions Exemption: 12 hr cold startup, 3 hr normal-startup, 2 hr unplanned load changes, and 1 hr shutdown</p> <p><u>Condition 5.a-f</u> - 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><u>Condition 7.a-l &amp; 8.a-c</u> - Operate and maintain CEMs &amp; record permit specified data, CEMs calibration and maintenance per 40 CFR, part 51, Appendix P, Sections 3.0 through 3.9.5</p> <p><u>Condition 9</u> - Written Notification of monitored emission standards violations within 96 hours</p> <p><u>Condition 10.a-d &amp; 11</u> - Permanent CEMs records, to include permit specified data, Upon request submit CEMs data to District</p> <p><u>Condition 12 &amp; 13</u> - CEMs data reduced per 40 CFR, part 51, appendix P, paragraphs 5.0 – 5.3.3. Records maintained per permit conditions</p> <p><u>Condition 14.a-b</u> - 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></p> <p>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></p> <p>Condition 1, 2, 4, 5, &amp; 6 – Annual source test conducted on February 9, 2022.</p> <p>Condition 2, 7, 10, 11, 13 – Recordkeeping.</p> <p>Condition 3 – Exemptions applied as required throughout the calendar year.</p> <p>Condition 5 – Utilize certified Source Test vendors, use specified test methods, and submit documentation per deadline requirements.</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><b>F. Currently in Compliance?</b> <b>YES</b></p> <p><b>G. Compliance Status:</b> <b>CONTINUOUS</b></p> <p><b>H. *Excursions, Exceedence, or other non-compliance:</b> <b>NO</b></p>



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**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2022 - December 31, 2022**

<p>A. Attachment # or Permit Condition #: Section 6 – Attachment STRMLN15LM2500-NOx,CO-rev 391</p>	<p>D. Frequency of monitoring: <b>Monthly</b></p>
<p>B. Description: GE LM-2500 Gas Turbine Based Cogeneration Unit NOx and CO Applicable Requirements</p> <p>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 within 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>E. Source test reference method <b>See Source Test Summary Form 3 of 4</b></p> <p>EPA Method 20 -NOx ARB Method 100 -CO, O2 ASTM Method D 3588-91 - Fuel HV</p>
<p>C. Method of monitoring:</p> <p>Condition 1, 3 – Annual source test conducted on April 27, 2022 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>F. Currently in Compliance? <b>YES</b></p> <p>G. Compliance Status: <b>CONTINUOUS</b></p> <p>H. *Excursions, Exceedence, or other non-compliance: <b>NO</b></p>



Ventura County  
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**ANNUAL COMPLIANCE CERTIFICATION  
PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2022 - December 31, 2022**

<p>A. Attachment # or Permit Condition #: Section 6 – Attachment STRMLN15-SOx-rev 441</p>	<p>D. Frequency of monitoring: <b>Monthly</b></p>
<p>B. Description: LM6000 and LM2500 Gas Turbine Based Cogeneration Units SOx Applicable Requirements - Streamlined</p> <p>Condition 1 – Gaseous Fuel &lt; 50 grains sulfur per 100 Cu Ft. of fuel</p> <p>Condition 2 – If use PUC fuels used Rule 64 compliance is assumed</p> <p>Condition 3 – All emissions must be &lt; 300 ppm SO2 at discharge</p> <p>Condition 4 – Upon Request source test for SO2 at discharge points</p>	<p>E. Source test reference method <b>N/A</b></p>
<p>C. Method of monitoring:</p> <p>Condition 1-3 - Both the LM6000 and LM2500 exclusively use PUC-quality natural gas.</p> <p>Condition 4 – Source Test upon request</p>	<p>F. Currently in Compliance? <b>YES</b></p> <p>G. Compliance Status: <b>CONTINUOUS</b></p> <p>H. *Excursions, Exceedence, or other non-compliance: <b>NO</b></p>



Ventura County  
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## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2022 - December 31, 2022**

<b>A. Attachment # or Permit Condition #:</b> Section 6 – Attachment NESHAP KK	<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 it complies with HAP limitations  Condition 5 – Maintain monthly records and calculations of HAP materials and their HAP fractions  Condition 6 – Provided 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: In 2022, site maintained non-major HAP status by emitting less than 10 TPY of any one HAP and less than 25 TPY of all HAPs. HAP emission and mass fraction monthly records are maintained as required by permit condition.	<b>F. Currently in Compliance?</b> <b>YES</b>  <b>G. Compliance Status:</b> <b>CONTINUOUS</b>  <b>H. *Excursions, Exceedence, or other non-compliance:</b> <b>NO</b>



Ventura County  
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### ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2022 - December 31, 2022**

A. Attachment # or Permit Condition #: Section 6 – Attachment ATCM Engine N1	D. Frequency of monitoring: <b>Monthly</b>
B. Description: ATCM for Stationary Compression Ignition Engines  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	E. Source test reference method <b>N/A</b>
C. Method of monitoring: Condition 1.a-e: Facility uses only specified approved fuels.  Condition 2: Facility maintains monthly log of engine hours of operation.  Conditions 3.a-e: Facility maintains fuel purchase records.	F. Currently in Compliance? <b>YES</b>  G. Compliance Status: <b>CONTINUOUS</b>  H. *Excursions, Exceedence, or other non-compliance: <b>NO</b>



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## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2022 - December 31, 2022**

<p><b>A. Attachment # or Permit Condition #:</b> Section 6 - Attachment 40CFR63 ZZZZN3</p>	<p><b>D. Frequency of monitoring:</b> <b>Monthly</b></p>
<p><b>B. Description: 40 CFR Part 63 Subpart ZZZZ Applicable Requirements</b></p> <p><u>Condition 1:</u> Meet work practice standards including annual oil and filter changes, air cleaner inspections and belt/hose inspections. Report any delays due to emergency use to APCD.</p> <p><u>Condition 2:</u> Operate and maintain IC engines according to manufacturer's emission related instructions or per site plan to maintain and operate equipment consistent with good air pollution control practices.</p> <p><u>Condition 3:</u> RICE must be equipped with non-resettable hour meter.</p> <p><u>Condition 4:</u> Minimize idle time during startup and minimize startup time to safe engine loading time, not to exceed 30 minutes.</p> <p><u>Condition 5:</u> Limit non-emergency use of engines to no more than 100 hours per calendar year for maintenance and readiness testing and other allowed uses. Within this 100 hour allowance, limit hours for non-emergency non-maintenance/readiness testing (uses outlined in 63.6640 (f) ) to no more than 50 hours per calendar year.</p> <p><u>Condition 6:</u> Maintain records of maintenance conducted on stationary emergency RICE and record hours of operation for emergency use and non-emergency uses to demonstrate compliance with Condition 5.</p> <p><u>Condition 7 &amp; 8:</u> Non applicable condition - the site does not operate RICE for emergency demand response.</p> <p><u>Condition 9:</u> Annually certify that all engines operate in compliance with 40 CFR Part 63 Subpart ZZZZ.</p>	<p><b>E. Source test reference method</b> <b>N/A</b></p>
<p><b>C. Method of monitoring:</b></p> <p><u>Condition 1:</u> Maintain records to demonstrate that annual oil and filter changes, air cleaner inspections and annual belt/hose inspections are completed. Report any delays due to emergency use to APCD.</p> <p><u>Condition 2:</u> Operate and maintain IC engines according to site plans for maintenance and operation consistent with good air pollution control practices.</p> <p><u>Condition 3:</u> RICE are currently equipped with non-resettable hour meters.</p> <p><u>Condition 4:</u> Minimize idle time during startup and minimize startup time to safe engine loading time, not to exceed 30 minutes</p> <p><u>Condition 5:</u> Compliance with hour limitations is demonstrated by records of hours of operation for emergency, non-emergency and non-emergency/non- maintenance or readiness testing use.</p> <p><u>Condition 6:</u> Maintain records of maintenance conducted on stationary emergency RICE and record hours of operation for emergency use and non-emergency uses to demonstrate compliance with Condition 5.</p> <p><u>Conditions 7 &amp; 8:</u> Non-applicable condition - the site does not operate RICE for emergency demand response.</p> <p><u>Condition 9:</u> Annual Subpart ZZZZ compliance certification is satisfied by the ACC</p>	<p><b>F. Currently in Compliance?</b> <b>YES</b></p> <p><b>G. Compliance Status:</b> <b>CONTINUOUS</b></p> <p><b>H. *Excursions, Exceedence, or other non-compliance:</b> <b>NO</b></p>

# **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, 2022 - December 31, 2022**

<b>A. Attachment # or Permit Condition #:</b> Section 7 – Attachment PO00015PC1-rev411, 431, 441	<b>D. Frequency of monitoring: Monthly</b>
<b>B. Description: Throughput &amp; Consumption Limits and Solvent Records</b>  Condition 1 – Maintain Monthly throughput (emissions) records as detailed in Section No. 3 "Permitted Throughput and Consumption Limit Table.  Condition 2 – Maintain a list of all exempt solvents used , a reference to the specific permit exemption status and their ROC content and pounds used per rolling 12 month period.  Condition 3 - Permission to operate a rental boiler that is < 100 MMBTU/hr as an alternative to operating the 100 MMBTU/hr B-301 Boiler for up to 12 months. While in use, PO00015PC2 shall apply and PO00015PC4 shall not apply. The temporary boiler shall be equipped with Low NOx burners to meet the PO00015PC2 emissions limitations for the B-301 Boiler and the permittee shall maintain documentation that the temporary boiler meets the required emission limitations and records of usage of the temporary rental boiler.	<b>E. Source test reference method</b>  N/A
<b>C. Method of monitoring:</b> Condition 1 – Monthly records of emissions specified in Table 3 throughput column are recorded.  Condition 2 – Exempt Solvent list maintained.  Condition 3 - Rental boiler was not used during this reporting period.	<b>F. Currently in Compliance?</b> YES  <b>G. Compliance Status:</b> CONTINUOUS  <b>H. *Excursions, Exceedance, or other non-compliance:</b> NO





Ventura County Air  
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District

**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2022 - December 31, 2022**

<p><b>A. Attachment # or Permit Condition #:</b> Section 7 – Attachment PO00015PC2-rev 411, 431, 441</p>	<p><b>D. Frequency of monitoring:</b> <b>Monthly</b></p>
<p><b>B. Description: Combustion Emissions Units- LM6000, LM2500, B&amp;W Steam Boiler, 1X Hot Air, 1X Yankee Furnace, 2X Furnaces</b></p> <p>Condition 1 – Specifies monitoring requirements and calculations to demonstrate compliance with TPY emissions limits for Combustion Unit group identified in this condition.          Condition 2 – Restricts fuel used in specified combustion units to Natural Gas (NG)          Condition 3 – Maintain records: 12 mo. Rolling average fuel usage and emissions based on Emission Factors and CEM units specified in this condition and condition 1 above.          Condition 4 - The Table 4 CO hourly lb./hour for the LM2500 shall be demonstrated by the annual source test requirement in STRMLIN15LM2500-NOx, CO.          Condition 5 - The Table 4 CO hourly lb./hour for the LM600 shall be demonstrated by the annual source test requirement in STRMLIN15LM6000-NOx.          Condition 6 - Permission to operate a rental boiler that is &lt; 100 MMBTU/hr as an alternative to operating the 100 MMBTU/hr B-301 Boiler for up to 12 months. While in use, PO00015PC2 shall apply and PO00015PC4 shall not apply. The temporary boiler shall be equipped with Low NOx burners to meet the PO00015PC2 emissions limitations for the B-301 Boiler and shall maintain documentation that the temporary boiler meets the B-301 emission limitations and records of usage of the temporary rental boiler.</p>	<p><b>E. Source test reference method</b> <b>N/A</b></p>
<p><b>C. Method of monitoring:</b></p> <p>Condition 1 – Monthly monitoring of emissions records to ensure compliance with combustion emission limits.</p> <p>Condition 2 – Facility exclusively utilized PUC Natural Gas to fire all permitted combustion units at facility.</p> <p>Condition 3 - CEMS data from the turbines is used to maintain 12 month rolling averages for NOx, CO, and NH3. All other 12 month rolling averages are maintained by Emission Factors and fuel use.</p> <p>Condition 4 &amp; 5 - Source Test records demonstrating the Table 4 limits for each turbine was performed and submitted per the STRMLN Requirements for each turbine.</p> <p>Condition 6 - Alternative Operating Scenario was not utilized in RY2022</p>	<p><b>F. Currently in Compliance?</b> <b>YES</b></p> <p><b>G. Compliance Status:</b> <b>CONTINUOUS</b></p> <p><b>H. *Excursions, Exceedance, or other non-compliance:</b> <b>NO</b></p>



Ventura County Air  
Pollution Control  
District

**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2022 - December 31, 2022**

<p><b>A. Attachment # or Permit Condition #:</b></p> <p>Section 7 – Attachment PO00015PC3-rev351</p>	<p><b>D. Frequency of monitoring:</b> Condition 2 - Semi Annual Condition 3 - Permit Term Condition 4 - BI Annual</p>
<p><b>B. Description: 2X Papermachine Hot Air Furnace and "Yankee" Hood Furnace Requirements</b></p> <p>Condition 1 –Emission limitations: NOx &lt; 0.08 lb./MMBTU, CO &lt; 0.045 lb./MMBTU</p> <p>Condition 2 –Fuel and air settings locked in position as specified in permit. Settings recorded every 6 months</p> <p>Condition 3 – Source test the Pre Dryer Hot Air Furnace and Yankee Hot Air Furnace once every 24 months using ARB Method 100 for NOx, CO and O2. Notification &amp; Test Protocol to District 15 days in advance. Report within 45 after test before May 26, 2022 using ARB Method 100 for NOx, CO and O2. Notification &amp; Test Protocol to District 15 days in advance. Report within 45 after test.</p>	<p><b>E. Source test reference method:</b> <b>ARB Method 100:</b> NOx CO Stack Gas O2 See Source Test Form 4 of 4</p>
<p><b>C. Method of monitoring:</b></p> <p>Condition 1 - Both Furnaces demonstrated compliance to the NOx and CO limits per their last Source Test 5/26/20</p> <p>Condition 2 – Fuel Linkage settings for the Yankee and Hot Air Furnaces were monitored in January and July to meet requirement</p> <p>Condition 3 - Condition requirements were met as demonstrated in the most recently submitted Source Test Report.</p>	<p><b>F. Currently in Compliance?</b> <b>YES*</b></p> <p><b>G. Compliance Status:</b> <b>CONTINUOUS</b></p> <p><b>H. *Excursions, exceedances, or other non-compliance:</b> <b>NO</b></p>



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### ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2022 - December 31, 2022**

<b>A. Attachment # or Permit Condition #:</b> Section 11 – Attachment 40 CFR Part 82 (04/10/15)	<b>D. Frequency of monitoring:</b> Monthly
<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	<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, Subpart F requirements.	<b>F. Currently in Compliance?</b> YES <b>G. Compliance Status:</b> CONTINUOUS <b>H. *Excursions, Exceedence, or other non-compliance:</b> NO