VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT
669 County Square Drive
Ventura, CA 93003
805/645-1400

PART 70 PERMIT

Number 01267

Permit Term: July 25, 2014 to March 31, 2019

Company Name / Address:
Trustees of CSU and CSUCI Site Authority
One University Drive
Camarillo, CA 93012

Facility Name / Address:
Trustees of CSU and CSUCI Site Authority
1947 West Potrero Road
Camarillo, CA 93012

Responsible Official:
Ms. Ysabel Trinidad
Vice President
805/437-8878

Title V Contact:
Mr. Jeff Smith
Plant Manager
805/437-3795

The Part 70 permit consists of this page and the tables, attachments and conditions listed in the attached table of contents. The Part 70 permit application is included for reference only and is not a part of the Part 70 permit.

Pursuant to Rule 33.1, the Part 70 permit shall also serve as a permit to operate issued to fulfill the requirements of Rule 10.B.

For:

Terri Thomas
Engineering Division
July 25, 2014

Michael Villegas
Air Pollution Control Officer
PART 70 PERMIT NO. 01267
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Note: The Part 70 permit application is included for reference only and is not a part of the Part 70 permit.
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<thead>
<tr>
<th>Application No.</th>
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| 01267-ADMI     | 01/26/00   | Changed Responsible Official and Title V Contact, revised emission factors / Administrative Part 70 Permit Amendment | • Signature Cover Page  
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<td>01267-211</td>
<td>03/22/12</td>
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<td>01267-221</td>
<td>07/25/14</td>
<td>Permit Reissueance for Period Terminating March 31, 2019</td>
<td>See “Permit Summary and Statement of Basis”</td>
</tr>
</tbody>
</table>
1.b. PERMIT SUMMARY AND STATEMENT OF BASIS

Stationary Source Description

This stationary source is a cogeneration facility which produces electricity for sale to the power grid; and steam and electricity for exportation to the nearby California State University facility. This source has a Standard Industrial Classification (SIC) Code of 4931, Electric and Other Services Combined. The source operates a cogeneration unit which consists of a General Electric LM 2500-33 natural gas-fired turbine that drives a 21.5 MW electrical generator. The stationary source also operates two 31.0 MMBTU/Hr Babcock and Wilcox steam boilers as standby units to provide steam to the California State University facility during periods when the gas turbine is not in operation. The permit also includes a 755 HP emergency standby diesel engine. This stationary source is subject to the Part 70 permit program based upon the potential to emit nitrogen oxides (NOx). The greenhouse gas potential to emit also exceeds the Part 70 permit program threshold.

As discussed in more detail throughout this Permit Summary and Statement of Basis, this permit applies to emissions units that are required to have a permit to operate pursuant to District Rule 10, “Permits Required”, and District Rule 23, “Exemptions from Permit”. These emissions units are listed in Table No. 2 in Section No. 2 of this permit. However, as discussed below, some equipment that is exempt from permit pursuant to District Rule 23, “Exemptions from Permit”, may be subject to District rules such as District Rules 50, “Opacity” and 55, “Fugitive Dust”. This includes “Insignificant Activities” as listed in Section No. 5 of the permit. In addition, “Short Term Activities” as listed in Section No. 9 of the permit are subject to certain rules and regulations. This permit does not regulate or restrict the use of motor vehicles and mobile equipment such as cars, trucks, bulldozers, and forklifts, however, any smoke or dust emissions generated from the use of such equipment is subject to District Rules 50, “Opacity” and 55, “Fugitive Dust”. This permit does not shield the permittee from complying with any Federal, State, or District rule or regulation that is not specifically addressed in the permit or any rule or regulation that may come into effect during the term of the permit.

Stationary Source Emissions

In Ventura County, the Part 70 permit thresholds are 50 tons per year for ROC and NOx and 100 tons per year for PM, SOx, and CO, pursuant to Rule 33.B.2 and Ventura County’s “Serious” nonattainment classification with the federal ozone standard. Ventura County’s nonattainment classification with the federal ozone standard has been in transition and is currently set at “Serious”. As shown in Table No. 4, “Permitted Emissions”, of the permit, none of the permitted emissions exceed these thresholds; however, the nitrogen oxides (NOx) potential to emit, when the emergency engine is included, does exceed the NOx threshold. The purpose of Table No. 4 is to document the permitted emissions of the criteria pollutants ROC, NOx, PM, SOx, and CO for this stationary source. Permitted Emissions of ammonia are also included in Table 4 for the turbine. District Rule 29, “Conditions on Permits”, requires permitted emissions to be included on each Permit to Operate. District Rule 29 requires that annual permitted emissions be based on a 12 calendar month rolling period and be expressed in units of tons per year. Hourly permitted emissions are required to be expressed in units of pounds per hour.
Permitted emissions for a stationary source are required to be determined by aggregating the permitted emissions for each emissions unit at the stationary source.

Criteria pollutant emissions (ROC, NOx, PM, SOx, and CO) result from the combustion of natural gas in the turbine and boiler and the combustion of diesel fuel in the emergency standby engine.

This stationary source is not a major source of federal Hazardous Air Pollutants (HAPs). The source is well below the HAP major source levels of 10 tons per year of a single HAP or 25 tons per year of combined HAPs. The Part 70 Permit re-issuance application includes a summary (in the units of pounds per year and pounds per hour) of pollutants that are subject to the State of California AB2588 Air Toxics “Hot Spot” Program. The goal of the Air Toxics “Hot Spots” Information and Assessment Act of 1987 (California Health and Safety Code Section 44300) is to collect air toxics emission data, to identify facilities having localized adverse health impacts, to ascertain health risks, to notify nearby workers and residents of significant risks, and to reduce significant risks if they exist. Under state law, motor vehicles (on-road and off-road) are not subject to the “Hot Spots” program. This facility has been subject to the “Hot Spots” program since the program’s inception. Based on the quantity of toxic air contaminants released from the facility as determined by source testing, material balance calculations, and other engineering estimates, the potency and toxicity of materials released, and the proximity to sensitive receptors, this facility has been classified at the “intermediate” level. As an intermediate level facility, the stationary source is required to provide a toxics report every four years. The most recent submittal was received in 2014. This report stated that no changes had been made to the facility since the 1992 reporting year in which an extensive toxics report was conducted.

The United States EPA has added greenhouse gases (GHGs) to the list of regulated air pollutants. As of January 2, 2011, EPA has required that GHGs be calculated for each Title V stationary source and included in the Part 70 Permit. EPA has “tailored” the regulations to include GHGs, such that the Title V applicability for the stationary source based on GHGs alone is emissions of 100,000 tons per year of CO₂ equivalent emissions (CO₂e). Greenhouse gases are defined as the aggregate group of six greenhouse gases: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons (by category), perfluorocarbons (by category), and sulfur hexafluoride. CO₂e is the amount of greenhouse gases emitted relative to the global warming potential of each pollutant. An approximate CO₂e potential to emit for this stationary source has been calculated to be 151,440 tons per year. This potential to emit is based on the permitted annual combustion limits listed in Table No. 3 of the permit. The District has used an emission factor of 53.02 kg CO₂/MMBTU natural gas (116.78 lb CO₂/MMBTU natural gas) from the Regulation For The Mandatory Reporting of Greenhouse Gas Emissions, California Code of Regulations, title 17, Subchapter 10, Article 2, sections 95100 to 95133; Appendix A, Table 4. The emission factor is only based on a carbon dioxide (CO₂) emission factor and does not include a nitrous dioxide (N₂O) or methane (CH₄) component. For this purpose, the N₂O and CH₄ components are negligible as compared to the CO₂ emissions. The calculations assume a natural gas heating value of 1,050 BTU per cubic foot and an engine efficiency of 10,000 BTU per BHP-hr. This CO₂e potential to emit does not include insignificant activities or equipment exempt from permit pursuant to Rule 23, “Exemptions From Permit”. Note that the emissions of greenhouse gases
are not subject to Rule 42, "Permit Fees", and are not included in Table No. 4, "Permitted Emissions".

Compliance History

Upon reissuance of this Part 70 permit, the facility was determined to be in compliance with all applicable requirements. For the time period from April 1, 1999 to June 3, 2014, the facility received no Notices of Violation (NOV) from the VCAPCD Compliance Division.

Equipment Description and Applicable Requirements - General

Applicable requirements for this stationary source are listed throughout the permit. The Table of Contents in the front of the permit summarizes the applicable requirements including the equipment specific requirements, the general applicable requirements, and the applicable requirements for short-term activities. Table No. 2 in Section No. 2 of this Permit to Operate details the applicable requirements for specific emissions units at the facility. Permit conditions that enforce these requirements are listed in Section No. 6, "Specific Applicable Requirements" and Section No. 7, "Permit Specific Conditions" of this permit.

In addition to the emission unit specific requirements in Section No. 6 and Section No. 7, there are additional general requirements that may apply to the emissions units listed in this table, or to the stationary source as a whole. Furthermore, some general requirements may apply to emissions units or short-term activities not required to be specifically listed on the permit. These general requirements are contained in the following sections of the Permit: Section No. 8, "General Applicable Requirements"; Section No. 9, "General Requirements for Short-Term Activities"; Section No. 10, "General Permit Conditions"; and Section No. 11, "Miscellaneous Federal Program Conditions". A detailed applicability discussion and additional legal basis for the permit condition(s) is included with each attachment or set of permit conditions.

Equipment Description and Applicable Requirements - Specific

Construction on this facility was initiated in 1986 and therefore the cogeneration unit was subject to the best available control technology requirements of Rule 26, "New Source Review". In addition, the cogeneration unit is subject to Rule 74.23, "Stationary Gas Turbines", and 40 CFR Part 60 Subpart GG, "Standards of Performance for Stationary Gas Turbines". In order to comply with these requirements, the cogeneration unit is controlled by selective catalytic reduction (SCR) and water injection. In addition, the facility operates a continuous emissions monitoring system (CEMS) at the cogeneration unit which continuously monitors control system operating parameters, as well as emissions of NO\textsubscript{x} from the gas turbine. The two 31.0 MMBTU/Hr Babcock and Wilcox steam boilers are equipped with low NO\textsubscript{x} burners to comply with Rule 74.15, "Boilers, Steam Generators, and Process Heaters". The cogeneration unit and boilers are permitted to burn natural gas as the primary fuel and are permitted to burn distillate fuel oil during periods of natural gas curtailment.

The turbine based cogeneration unit is not subject to 40 CFR, Part 60, Subpart KKKK, "Standards of Performance for Stationary Combustion Turbines", because construction of the

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Permit Summary and Statement of Basis (01267-221)
turbine commenced prior to February 18, 2005 and no modification or reconstruction has taken place since that date. The turbine has been permitted with the District since December 28, 1989. No changes have been made to the turbine since it has been permitted with the Title V permit program (April 1, 1999). The permit includes a permit shield for 40 CFR Part 60, Subpart KKKK.

The turbine based cogeneration unit is not subject to 40 CFR, Part 63, Subpart YYYY, “National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines” (Turbine MACT) because the stationary source is not a major source of HAPs (Hazardous Air Pollutants). Also, the turbine is classified in the MACT as an “existing stationary combustion turbine”; and therefore, would not be required to meet the requirements of Subpart YYYY or Subpart A, including the initial notification requirements, even if the facility was a major source of HAPs.

The permit also includes permit shields for the boilers from 40 CFR Part 60, Subpart Dc, “Standards of Performance for Small Industrial – Commercial – Institutional Steam Generating Units”, and 40 CFR Part 63, Subpart JJJJJJ, “National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources”. The Subpart Dc does not apply to the two 31 MMBTU/hr boilers since they were constructed prior to June 9, 1989. The Subpart JJJJJJ does not apply to the two 31 MMBTU/hr boilers because they are natural gas fired units.

The turbine based cogeneration unit is not subject to 40 CFR, Part 64, “Compliance Assurance Monitoring” (CAM). The turbine based cogeneration unit is not subject to CAM because it is already equipped with continuous emission monitors to comply with the NOx emission limits of Rule 26 and Rule 74.23. The two 31.0 MMBTU/Hr Babcock and Wilcox steam boilers are not subject to CAM as they are not equipped with an emission control device to comply with the NOx limits of Rule 26 and Rule 74.15.

The stationary source is not subject to the requirements of 40 CFR Part 68, “List of Regulated Substances and Thresholds for Accidental Release Prevention”. The stationary source does utilize a regulated substance, anhydrous ammonia (NH₃); however, the stored amount is less than the 10,000 pound threshold per 40 CFR Part 68.130.

This stationary source is not by definition an “affected unit” under 40 CFR Part 72 Subpart A, and is therefore not subject to the acid rain program requirements of 40 CFR Parts 72 through 78. In addition, this facility has a permit shield from the individual applicable requirements which have been incorporated into a turbine streamline table. Therefore, demonstrating compliance with the streamlined requirements assures compliance with the individual turbine and duct burner requirements.

This facility also operates a diesel emergency electricity generating engine. The engine is subject to the California Air Toxic Control Measure for Stationary Compression Ignition Engines. The ATCM includes fuel and recordkeeping requirements for emergency diesel engines. The engine is also subject to the maintenance requirements of the federal National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal

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Combustion Engines (RICE MACT). The emergency engine is exempt from Rule 74.9, "Stationary Internal Combustion Engines".

Permit Revisions Summary

The Permit Revisions Table (located in Section No. 1 of the permit) is a list of all permit revisions since Part 70 Permit No. 01267 was initially issued on April 1, 1999. A portion of the permit revisions are described in further detail below. The District’s Engineering Analysis for each application can also be consulted for further details.

Application No. 01267-141: Application No. 01267-141 is for the reissuance of Part 70 Permit No. 01267 for the period April 1, 2004 to March 31, 2009. The following items summarize the changes from the initial Part 70 Permit No. 01267 (April 1, 1999 to March 31, 2004):

- All references to the three boilers located at California State University Channel Islands and previously permitted on VCAPCD Permit No. 00238 have been removed from the permit. The boilers have been permanently shut down. Permit Attachment PO01267PC2 Condition Nos. 2, 8, and 9 have been updated to reflect this change.
- The five-gallon unheated parts cleaner and all compliance requirements (i.e. Rule 74.6.1, "Cold Cleaners") have been removed from the permit.
- A permit attachment detailing the applicable requirements of Rule 74.11.1, "Large Water Heaters and Small Boilers", has been added to the permit.
- The Part 68 Permit Attachment has been updated to reflect that the facility has submitted a federal Risk Management Plan pursuant to section 112(r).
- The following rules have been revised and/or revisions of the rule have been adopted into the State Implementation Plan (SIP) since the initial issuance of the permit:
  a) Rule 54, “Sulfur Compounds”
  b) Rule 57, “Combustion Contaminants – Specific”
  c) Rule 64, “Sulfur Content of Fuels”
  d) Rule 68, “Carbon Monoxide”
  e) Rule 74.1, “Abrasive Blasting”
  f) Rule 74.2, “Architectural Coatings”
  g) Rule 74.6, “Surface Cleaning and Degreasing”
  h) Rule 74.6.1 “Cold Cleaners”
  i) Rule 74.9, “Stationary Internal Combustion Engines”
  j) Rule 74.15.1, “Boilers, Steam Generators, and Process Heaters”
  k) Rule 74.23, “Stationary Gas Turbines”
  l) Rule 103, “Continuous Monitoring Systems”

Application No. 01267-181: Application No. 01267-181 is for the reissuance of Part 70 Permit No. 01267 for the five-year period terminating on March 31, 2014. The following items summarize the changes due to this reissuance application:
Attachment PO01267PC1, Condition No. 2 has been revised to reflect Rule 23 changes regarding solvent use.

Revisions have been made to the Insignificant Activities Table.

The Rule 52 Attachment has been removed from the permit based on the April 13, 2004 revision to the rule which exempted most combustion sources from the rule.

The Rule 68 Attachment has been removed from the permit based on the April 13, 2004 revision to the rule which exempted most combustion sources from the rule.

An attachment for Rule 55, “Fugitive Dust” has been added to the permit.

Permit Shields for 40 CFR Part 60, Subpart KKKK and 40 CFR Part 63, Subpart YYYY have been added to the permit.

The following District rules have been adopted, revised and/or revisions of the rule have been adopted into the State Implementation Plan (SIP) since the April 1, 2004 to March 31, 2009 reissuance:

a) Rule 23, “Exemptions From Permit”
b) Rule 50, “Opacity”
c) Rule 57.1, “Particulate Matter Emissions From Fuel Burning Equipment”
d) Rule 74.6, “Surface Cleaning and Degreasing”
e) Rule 74.9, “Stationary Internal Combustion Engines”
f) Rule 74.29, “Soil Decontamination Operations”
g) California Airborne Toxic Control Measure (ATCM) For Stationary Compression Ignition Engines

Application No. 01267-221: Application No. 01267-221 is for the reissuance of Part 70 Permit No. 01267 for the five-year period terminating on March 31, 2019. The following items summarize the changes due to this reissuance application:

- Attachment 40CFR63ZZZZN3 has been added to Section No. 6 of the permit. As of May 3, 2013, the existing emergency diesel engine has been required to comply with the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT). The NESHAP includes maintenance requirements for the engine.

- The permit attachment for 40 CFR Part 68, “List of Regulated Substances and Thresholds for Accidental Release Prevention”, has been revised to reflect that the stationary source is no longer subject to the requirements of 40 CFR Part 68. The application states that the facility no longer stores ammonia quantities exceeding the Part 68 threshold; and the stationary source has de-registered from the EPA program.

- A permit shield has been added to the permit for 40 CFR Part 63 Subpart JJJJJJJ, “National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources”

- The following rules have been adopted, revised and/or revisions of the rule have been adopted into the State Implementation Plan (SIP) since the previous permit reissuance:
  a) Rule 54, “Sulfur Compounds”
  b) Rule 74.2, “Architectural Coatings”
c) Rule 74.11.1, "Large Water Heaters and Small Boilers"

d) California Airborne Toxic Control Measure (ATCM) For Stationary Compression Ignition Engines
1.c. PERIODIC MONITORING SUMMARY

This periodic monitoring summary is intended to aid the permittee in quickly identifying key monitoring, recordkeeping, and reporting requirements. It is not intended to be used as a “stand alone” monitoring guidance document that completely satisfies the requirements specifically applicable to this facility. The following tables are included in the periodic monitoring summary:

- Table 1.c.1 - Specific Applicable Requirements
- Table 1.c.2 - Permit-Specific Conditions
- Table 1.c.3 - General Applicable Requirements
- Table 1.c.4 - General Requirements for Short-Term Activities

1.c.1. Specific Applicable Requirements

The Specific Applicable Requirements Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 6 of this permit.

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<th>Attachment No./Condition No.</th>
<th>Applicable Rule or Requirement</th>
<th>Monitoring</th>
<th>Recordkeeping</th>
<th>Semi-annual Reports</th>
<th>Test Methods</th>
<th>Comments</th>
</tr>
</thead>
</table>
| 74.9N7                       | Rule 74.9.D.3                  | • Annual compliance certification  
• Records of operating hours and reasons for operation along with applicable engine identification | • Records of operating hours and reasons for operation along with applicable engine identification | None                |             | Rule 74.9 exemption for emergency engines |
| ATCM Engine N2               | ATCM for Stationary Compression Ignition Engines | • Hours of operation records for maintenance and testing  
• Fuel type records | • Hours of operation records for maintenance and testing  
• Fuel type records | None                | None         | Not Federally Enforceable |
| 40CFR63ZZZZN3                | RICE MACT for emergency diesel engines – oil change and inspections | • Maintenance records  
• Annual compliance certification | • Maintenance records  
• Hours of operation records | None                | None         |                     |
| 74.15N1                      | Rule 74.15.B.1                 | • Annual compliance certification  
• Biennial Source Test (NOx, CO) | • Records of source tests  
• Daily records of alternate fuel consumption | None                | • NOx-ARB Method 100  
• CO-ARB Method 100 | These boilers are used only when the gas turbine is not operating |
<table>
<thead>
<tr>
<th>Attachment No./Condition No.</th>
<th>Applicable Rule or Requirement</th>
<th>Monitoring</th>
<th>Recordkeeping</th>
<th>Semi-annual Reports</th>
<th>Test Methods</th>
<th>Comments</th>
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<tr>
<td>STRMLN1267-LM-2500-NOx, NH3</td>
<td>Rules 26, 74.23.B.1, 74.23.B.2, 74.23.B.4, 103.A.4, 40 CFR Part 60 Subpart GG</td>
<td>• Annual Source Test (NOx, O2, NH3, fuel HHV) • Submit test results w/in 45 days of conducting tests • CEMs for fuel consumption, NOx, O2, and control system operating parameters • Report each CEM emission violation w/in 96 hours • Annual compliance certification</td>
<td>• Records of CEMs data • Records of maintenance operations, periodic inspections, and repairs to turbine, air pollution control system, and CEMs • Records of source test reports and any violations or limit exceedances</td>
<td>• Actual annual operating hours or fuel consumption • Annual source test with control system operating parameters</td>
<td>• NOx-EPA Method 20 • O2 - ARB Method 100 • NH3 - BAAQMD Method ST-1B (1/20/82) • Gaseous fuel HHV - ASTM Method D1826-88 • Fuel oil HHV - ASTM Method 240-87</td>
<td>Streamlined Requirements</td>
</tr>
<tr>
<td>STRMLN1267-LM2500-SOx</td>
<td>Rules 26, 54 and 64, 40 CFR Part 60 Subpart GG,</td>
<td>• Annual compliance certification • None for PUC-quality gas • Annual test for non PUC-quality gas (submit with annual compliance certification) • Fuel oil supplier’s certification, or fuel test per each delivery</td>
<td>• Annual fuel gas analysis for non PUC-quality gas • Fuel supplier’s certification, or fuel test per each delivery</td>
<td>None</td>
<td>• Gaseous fuel: SCAQMD Method 307-94 • Fuel oil: ASTM Method D4294-98 or D2622-98 • Exhaust Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A,16B, or SCAQMD Method 307-94, as appropriate</td>
<td>Streamlined Requirements</td>
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1.c.2. Permit-Specific Conditions

The Permit-Specific Conditions Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 7 of this permit.

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<th>Attachment No./Condition No.</th>
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<td>PO1267PC1 Condition No. 1</td>
<td>Rule 26 General Recordkeeping</td>
<td>• Annual compliance certification</td>
<td>• Monthly records</td>
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<td>• Monthly records of throughput and consumption</td>
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<tr>
<td>PO1267PC1 Condition No. 2</td>
<td>Rule 29 Exempt Solvents</td>
<td>• Maintain a list of solvents is use and the solvent’s permit exemption status data</td>
<td>None</td>
<td>None</td>
<td>None</td>
<td>None</td>
</tr>
<tr>
<td>PO1267PC2 Condition No. 1</td>
<td>Rule 26 Combustion Units Annual Mass Emissions Limits</td>
<td>• Turbine CEMs (NOx)</td>
<td>• Monthly records of fuel consumption and emissions</td>
<td>None</td>
<td>None</td>
<td>None</td>
</tr>
<tr>
<td>Condition No. 8</td>
<td></td>
<td>• Monthly records of fuel consumption</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PO1267PC2 Condition No. 2</td>
<td>Rule 26 Fuel Limitations B&amp;W Boilers</td>
<td>• Records of fuel consumption</td>
<td>• Monthly records of fuel consumption</td>
<td>None</td>
<td>• NOx-ARB Method 100</td>
<td>Periodic monitoring required for NOx and CO while burning fuel oil upon District request as B&amp;W Boilers only operate when turbine is not in operation and fire fuel oil only during unlikely event of natural gas curtailment</td>
</tr>
<tr>
<td>Condition No. 8</td>
<td></td>
<td>• Annual compliance certification</td>
<td></td>
<td></td>
<td>• CO-ARB Method 100</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Source test for NOx and CO upon District request</td>
<td></td>
<td></td>
<td>• Fuel sulfur content: ASTM Method D4294-98 or D2622-98</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Records of fuel oil deliveries</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>• Obtain fuel supplier’s certification or test sulfur content of fuel</td>
<td></td>
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</tr>
<tr>
<td></td>
<td></td>
<td>• Annual compliance certification, including fuel sulfur content data</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PO1267PC2 Condition No. 3</td>
<td>Rule 26 Fuel Oil Combustion Requirements B&amp;W Boilers</td>
<td>• Monthly records of fuel consumption</td>
<td></td>
<td>None</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Condition No. 8</td>
<td></td>
<td>• Record of efforts taken to obtain lowest sulfur fuel oil</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Records of fuel oil sulfur content certifications or tests</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PO1267PC2 Condition No. 4</td>
<td>Rule 26 Fuel Metering Requirements B&amp;W Boiler</td>
<td>• Annual compliance certification</td>
<td>None</td>
<td>None</td>
<td>None</td>
<td>None</td>
</tr>
<tr>
<td>PO1267PC2 Condition No. 5</td>
<td>Rules 26 and 74.15 Oxygen Monitoring Requirements B&amp;W Boilers</td>
<td>• Annual compliance certification</td>
<td>None</td>
<td>None</td>
<td>None</td>
<td>Boilers only operate when the turbine is not in operation</td>
</tr>
</tbody>
</table>
### 1.c.2. Permit-Specific Conditions (Continued)

<table>
<thead>
<tr>
<th>Attachment No./Condition No.</th>
<th>Applicable Rule or Requirement</th>
<th>Monitoring</th>
<th>Recordkeeping</th>
<th>Semi-annual Reports</th>
<th>Test Methods</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>PO1267PC2 Condition No. 6</td>
<td>Rule 26 Simultaneous Operation Limits</td>
<td><em>Annual compliance certification</em></td>
<td>None</td>
<td>None</td>
<td>None</td>
<td></td>
</tr>
</tbody>
</table>
| PO1267PC2 Condition No. 7 Condition No. 8 | Rule 26 Natural Gas and Fuel Oil Combustion Requirements Gas Turbine | *Records of fuel consumption*  
*Records of fuel oil deliveries*  
*Obtain fuel supplier's certification or test sulfur content of fuel*  
*Annual compliance certification, including fuel sulfur content data*  
*Notify District within 5 days of burning fuel oil of efforts taken to obtain lowest sulfur fuel oil* | *Monthly records of fuel consumption*  
*Record of efforts taken to obtain lowest sulfur fuel oil*  
*Records of fuel oil sulfur content certifications or tests* | None | Fuel sulfur content: ASTM Method D4294-98 or D2622-98 | |
| PO1267PC2 Condition No. 9    | Rule 29 Notification of Planned Shutdowns | *Notify District Enforcement Section of planned shutdowns by Dec. 31 for next calendar year* | None | None | None | District Enforceable only |
### 1.c.3. General Applicable Requirements

The General Applicable Requirements Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 8 of this permit.

<table>
<thead>
<tr>
<th>Attachment No./Condition No.</th>
<th>Applicable Rule or Requirement</th>
<th>Monitoring</th>
<th>Recordkeeping</th>
<th>Semi-annual Reports</th>
<th>Test Methods</th>
<th>Comments</th>
</tr>
</thead>
</table>
| 50                          | Rule 50                        | • Routine surveillance  
• Visual inspections  
• Annual compliance certification, including a formal survey  
• Opacity readings upon request  
• Notification required for uncorrectable visible emissions | • All occurrences of visible emissions for periods > 3 min in any one hour  
• Annual formal survey of all emissions units | None                | • Opacity - EPA Method 9                                                                                     |                                                                          |
| 54.B.1                      | Rule 54.B.1                    | • Annual compliance certification  
• Follow monitoring requirements under Rule 64  
• Upon request, source test for sulfur compounds at point of discharge | None                                                                                     | None                | • Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD Method 307-91, as appropriate | • Compliance with Rule 64 ensures compliance with this rule based on District analysis |
| 54.B.2                      | Rule 54.B.2                    | • Annual compliance certification  
• Determine ground or sea level concentrations of SO₂, upon request | • Representative fuel analysis or exhaust analysis and compliance demonstration | None                | • SO₂ - BAAQMD Manual of Procedures, Vol. VI, Section 1, Ground Level Monitoring for H₂S and SO₂ |                                                                          |
| 55                          | Rule 55                        | • Annual compliance certification | • Specific activity records as applicable | None                | • EPA Method 9                                                                                      |                                                                          |
| 57.1                        | Rule 57.1                      | • Annual compliance certification | None                                       | None                | None                                                                                                  | • Not required based on District analysis                                                  |
| 64.B.1                      | Rule 64.B.1                    | • Annual compliance certification  
• None for PUC-quality gas, propane, or butane  
• Annual test if gas is other than PUC-quality gas, propane, or butane (submit with annual compliance certification) | • Annual fuel gas analysis if gas is other than PUC-quality gas, propane, or butane | None                | • SCAQMD Method 307-94                                                                   |                                                                          |
### 1.c.3. General Applicable Requirements (Continued)

<table>
<thead>
<tr>
<th>Attachment No./Condition No.</th>
<th>Applicable Rule or Requirement</th>
<th>Monitoring</th>
<th>Recordkeeping</th>
<th>Semi-annual Reports</th>
<th>Test Methods</th>
<th>Comments</th>
</tr>
</thead>
</table>
| 64.B.2                       | Rule 64.B.2                    | •Annual compliance certification  
•Fuel supplier's certification, or fuel test per each delivery  
(submit with annual compliance certification)  
•Routine surveillance of solvent cleaning activities  
•Upon request, solvent testing  
•Measurement of freeboard height and drain hole area for cold cleaners (as applicable) | •Fuel supplier's certification, or fuel test per each delivery | None | •ASTM Method D4294-98 or D2622-98 | |
| 74.6                         | Rule 74.6                      | •Annual compliance certification  
•Maintain current solvent information  
•Routine surveillance of solvent cleaning activities  
•Upon request, solvent testing  
•Measurement of freeboard height and drain hole area for cold cleaners (as applicable) | •Records of current solvent information | None | •ROC content-EPA Test Method 24  
•Identity of solvent components-ASTM E168-67, ASTM E169-87, or ASTM E260-85  
•True vapor pressure or composite partial pressure-ASTM D2879-86 or other methods per Rule 74.6.G.5  
•Initial boiling point-ASTM 1078-78 or published source  
•Spray gun active/passive solvent losses-SCAQMD Method (10-3-89) | |
| 74.11.1                      | Rule 74.11.1                   | •Annual compliance certification  
•Maintain identification records of large water heaters and small boilers | •Records of current information of large water heaters and small boilers | None | None | •Rule only applies to the installation of large water heaters and small boilers |
| 74.22                        | Rule 74.22                     | •Annual compliance certification  
•Maintain furnace identification records | •Records of current furnace information | None | None | •Rule only applies to future installation of natural gas-fired, fan-type furnaces |
1.c.4. General Requirements for Short-Term Activities

The General Requirements for Short-Term Activities Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 9 of this permit.

<table>
<thead>
<tr>
<th>Attachment No./Condition No.</th>
<th>Applicable Rule or Requirement</th>
<th>Monitoring</th>
<th>Recordkeeping</th>
<th>Semi-annual Reports</th>
<th>Test Methods</th>
<th>Comments</th>
</tr>
</thead>
</table>
| 74.1                        | Rule 74.1                      | • Annual compliance certification  
• Routine surveillance and visual inspections of abrasive blasting operation  
• Abrasive blasting records | • Abrasive blasting records | None | • Visible emission evaluation - Section 92400 of CCR |
| 74.2                        | Rule 74.2                      | • Annual compliance certification  
• Routine surveillance  
• Maintain VOC records of coatings used | • Maintain VOC records of coatings used | None | • See Rule 74.2.G |
| 74.4.D                      | Rule 74.4.D                    | • Annual Compliance certification  
• Test ROC content of oil sample being proposed for usage | • Records of oil analyses | None | • ASTM D402 |
| 40CFR61.M                   | 40 CFR Part 61, Subpart M      | • Annual compliance certification  
2. PERMITTED EQUIPMENT AND APPLICABLE REQUIREMENTS TABLE

Purpose

The purpose of this table is to list the emissions units at this stationary source that are permitted to operate pursuant to Rule 10, "Permits Required" and Rule 23, "Exemptions From Permit". The table also provides a list of requirements that are specifically applicable to these emissions units. Permit conditions that enforce these requirements are listed in Section No. 6, "Specific Applicable Requirements" and Section No. 7, "Permit Specific Conditions" of this permit.

In addition to the emission unit specific requirements in Section No. 6 and Section No. 7, there are additional general requirements that may apply to the emissions units listed in this table, or to the stationary source as a whole. Furthermore, some general requirements may apply to emissions units or short-term activities not required to be specifically listed on the permit. These general requirements are contained in the following sections of the Permit: Section No. 8, "General Applicable Requirements"; Section No. 9, "General Requirements for Short-Term Activities"; Section No. 10, "General Permit Conditions"; and Section No. 11, "Miscellaneous Federal Program Conditions".

Equipment Description

This portion of the table provides a brief description of the permitted equipment at this stationary source. Attached to the table is a "Title V Equipment List Description Key" that contains definitions and explanations for some of the standard terminology used in the equipment description.

Applicable Requirements

The applicable requirements portion of the table is a matrix of applicability for the specific requirements that apply to the listed emissions units. The columns are labeled with APCD rule numbers or references to federal requirements. An "X" in the row corresponding to the emissions unit indicates the requirement is specifically applicable to that unit. For cases where a rule has multiple compliance options, a number appears instead of an "X". The number is a code key that corresponds to the "Title V Applicable Requirement Code Key" attached to the table. The code key table contains specific citations for the portions of the rule that are applicable. The code key is also used to identify the permit attachment in Section No. 6, "Specific Applicable Requirements", that contains the associated permit conditions. For example, code key "3" under Rule 74.9 indicates that the emission unit is required to comply with the requirements of Attachment 74.9N3 in Section No. 6.

Permit specific conditions are identified with a "PC" followed by a number in the column labeled "ADD REQ" (additional requirements). A "PC#" in the row corresponding to the emissions unit indicates that the permit specific condition is specifically applicable to that unit. For the purpose
of the Annual Compliance Certification, the owner or operator can identify the conditions that apply within the "PC#". The "PC#" also corresponds to the permit attachment in Section No. 7, "Permit Specific Conditions," that contains the permit specific requirements.
### TABLE NO. 2

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
Permit to Operate No. 01267
Permitted Equipment and Applicable Requirements

<table>
<thead>
<tr>
<th>Equipment</th>
<th>54</th>
<th>64</th>
<th>74.9</th>
<th>74.15</th>
<th>74.22</th>
<th>103</th>
<th>NSPS GG</th>
<th>ATCM for CI Engines</th>
<th>RICE MACT</th>
<th>Additional Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 - 255.7 MMBTU/Hr (HHV) General Electric LM 2500-33</td>
<td>X</td>
<td>X</td>
<td>4</td>
<td>4</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>PC1, PC2</td>
</tr>
<tr>
<td>2 1.5 MW Turbine with a Heat Recovery Boiler, Water Injection</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>and SCR for NOx Control, Natural Gas-Fired with Fuel Oil for Curtailment</td>
<td></td>
<td></td>
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<td></td>
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</tr>
<tr>
<td>Situations</td>
<td></td>
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<td></td>
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<td></td>
<td></td>
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</tr>
<tr>
<td>1 - 31 MMBTU/Hr Babcock &amp; Wilcox Steam Boiler (FM-3029)</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>PC1, PC2</td>
</tr>
<tr>
<td>with a Coen DAF low NOx Burner, Natural Gas-Fired with Fuel Oil for</td>
<td></td>
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</tr>
<tr>
<td>Curtailment Situations</td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 - 31 MMBTU/Hr Babcock &amp; Wilcox Steam Boiler (FM-3030)</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>PC1, PC2</td>
</tr>
<tr>
<td>with a Coen DAF low NOx Burner, Natural Gas-Fired with Fuel Oil for</td>
<td></td>
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<tr>
<td>Curtailment Situations</td>
<td></td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 - 755 HP Detroit Diesel Emergency Standby Engine, (565 KW)</td>
<td>7</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>PC1</td>
</tr>
<tr>
<td>Model 71637305, Serial No. 16VA19578, &quot;Blackstart&quot;</td>
<td></td>
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<td></td>
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<td></td>
</tr>
</tbody>
</table>

Section No. 2

July 25, 2014
PART 70 PERMIT NO. 01267
TITLE V EQUIPMENT LIST DESCRIPTION KEY

The Permitted Equipment and Applicable Requirements Table and this Title V permit contain a number of terms, abbreviations, and acronyms that have been standardized. The following list describes and defines many of the terms in this permit:

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>APCD</td>
<td>Air Pollution Control District</td>
</tr>
<tr>
<td>APCO</td>
<td>Air Pollution Control Officer of the Ventura County APCD</td>
</tr>
<tr>
<td>ARB</td>
<td>The California Air Resources Board</td>
</tr>
<tr>
<td>ASTM</td>
<td>American Standards for Testing Materials</td>
</tr>
<tr>
<td>BACT</td>
<td>Best Available Control Technology</td>
</tr>
<tr>
<td>BHP</td>
<td>The rating of an internal combustion engine as measured in brake horsepower</td>
</tr>
<tr>
<td>CARB</td>
<td>California Air Resources Board</td>
</tr>
<tr>
<td>CFH</td>
<td>Cubic feet per hour</td>
</tr>
<tr>
<td>CFM</td>
<td>Cubic feet per minute</td>
</tr>
<tr>
<td>CFR</td>
<td>Code of Federal Regulations</td>
</tr>
<tr>
<td>CO</td>
<td>Carbon Monoxide</td>
</tr>
<tr>
<td>EPA</td>
<td>Environmental Protection Agency</td>
</tr>
<tr>
<td>FGR</td>
<td>Flue Gas Recirculation – NOx control technology primarily used for boilers</td>
</tr>
<tr>
<td>FO</td>
<td>Fuel Oil</td>
</tr>
<tr>
<td>GE</td>
<td>General Electric</td>
</tr>
<tr>
<td>Gal</td>
<td>Gallon</td>
</tr>
<tr>
<td>HAP</td>
<td>Hazardous Air Pollutant</td>
</tr>
<tr>
<td>Lb ROC/Gal</td>
<td>Pound(s) of ROC per gallon</td>
</tr>
<tr>
<td>MMBTU</td>
<td>The heat input of a combustion device as measured in millions British Thermal Units</td>
</tr>
<tr>
<td>MW</td>
<td>MegaWatt</td>
</tr>
<tr>
<td>NESHAPS</td>
<td>National Emission Standards for Hazardous Air Pollutants</td>
</tr>
<tr>
<td>NH₃</td>
<td>Ammonia</td>
</tr>
</tbody>
</table>

Section No. 2
Equipment List Description Key / Glossary
NG  Natural Gas
NOx  Oxides of Nitrogen
NSPS  New Source Performance Standard
PM  Particulate Matter
ROC  Reactive Organic Compound
SCAQMD  South Coast Air Quality Management District
SCFM  Standard cubic feet per minute
SCR  Selective Catalytic Reduction for NOx control
SIP  State Implementation Plan
SOx  Sulfur Oxides
1,1,1-TCA  Trichloroethane
TV AF  Title V application form
VOC  Volatile Organic Compound
PART 70 PERMIT NO. 01267
TITLE V APPLICABLE REQUIREMENT CODE KEY

Rule 74.9, "Stationary Internal Combustion Engines"
1. Pre-January 1, 2002 emissions limits for rich-burn engines (increments of progress have passed)
2. Pre-January 1, 2002 emissions limits for lean-burn engines (increments of progress have passed)
3. Natural gas-fired rich-burn engines (74.9.B.1 or 74.9.B.2)
4. Natural gas-fired lean-burn engines (74.9.B.1 or 74.9.B.2) with ammonia emission limit, if applicable. (74.9.B.5)
5. Diesel engines. (74.9.B.1 or 74.9.B.2) with ammonia emission limit, if applicable. (74.9.B.5)
6. Exemption from Rule 74.9 for engines operated less than 200 hours per calendar year (74.9.D.2)
7. Exemption from Rule 74.9 for emergency standby engines operated during either an emergency or maintenance operation. (74.9.D.3)
8. Exemption from Rule 74.9 for diesel engines with a permitted capacity factor of less than or equal to 15%. (74.9.D.8)
9. Exemption from Rule 74.9 for diesel engines used to power cranes and welding equipment. (74.9.D.9)
10. Exemption from Rule 74.9 for diesel engines operated on San Nicolas Island. (74.9.D.10)

Rule 74.15, "Boilers, Steam Generators and Process Heaters"
1. NOx and CO emission limits for units with an annual heat input rate greater than or equal to 9,000 MMBTU per calendar year (74.15.B.1)
2. Tuning and fuel metering requirements for units with an annual heat input rate of less than 9,000 MMBTU per calendar year. (74.15.B.2 and 74.15.D.1)

Rule 74.23, "Stationary Gas Turbines"
1. NOx and NH3 emission limit for turbines rated at 0.3 MW to less than 2.9 MW
   (74.23.B.1 and 74.23.B.4) Requirement to monitor operating parameters. (74.23.B.2.a and b)
2. NOx and NH3 emission limit for turbines rated at 2.9 MW to less than 10.0 MW.
   (74.23.B.1 and 74.23.B.4) Requirement to monitor operating parameters. (74.23.B.2.a and b)
3. NOx and NH3 emission limit for turbines rated at 10.0 MW and higher, with SCR, and operated less than 4,000 hr/yr (74.23.B.1 and 74.23.B.4) Requirement to monitor operating parameters. (74.23.B.2.a and b)
4. NOx and NH3 emission limit and CEMS requirement for turbines rated at 10.0 MW and higher, with SCR, and operated more than 4,000 hr/yr (74.23.B.1, 74.23.B.2, and 74.23.B.4)
5. NOx emission limit for turbines rated at 10.0 MW and higher, without SCR, and operated less than 4,000 hr/yr (74.23.B.1) Requirement to monitor operating parameters. (74.23.B.2.a and b)
6. NOx emission limit and CEMS requirement for turbines rated at 10.0 MW and higher, without SCR, and operated more than 4,000 hr/yr (74.23.B.1 and 74.23.B.2)
7. NOx emission limit for turbines rated at 4.0 MW and higher, operated less than 877 hr/yr (74.23.B.1) Requirement to monitor operating parameters. (74.23.B.2.a and b)
8. Exemption from the requirements of 74.23.B, for turbines operated less than 200 hrs per calendar year (74.23.C.1.c)
9. Exemption from the requirements of 74.23.B, for emergency standby units operated during either an emergency or maintenance operation. (74.23.C.1.d)
10. Equipment is currently shut-down and not operating. Upon operation will install non-resettable totalizing hour meter (74.23.D.2). Exempt from the requirements of 74.23.B as long as turbine is operated less than 200 hrs per calendar year (74.23.C.1.c)

Rule 103, "Stack Monitoring"
1. CEM requirements for emission sources required by federal regulations to be equipped with a CEM system (103.A.1)
2. CEM requirements for boilers, steam generators, and process heaters with a heat input capacity of between 40 MMBTU/HR and 250 MMBTU/HR, and a capacity factor of at least 30% (103.A.2)
3. CEM requirements for boilers, steam generators, and process heaters with a heat input capacity of 250 MMBTU/HR or more (103.A.3)
4. CEM requirements for any equipment which emits 2.3 kg/hr (5 lb/hr) or 22.7 kg/day (40 lb/day) or more of any single air contaminant (103.A.4)

Section 93115, Title 17, California Code of Regulations California Airborne Toxic Control Measure For Stationary Compression Ignition (CI) Engines
1. In-use emergency fire pump assembly engines
2. In-use emergency engines operated not more than 20 hours per year for maintenance and testing purposes.
3. Engines operated solely on OCS Platforms.
4. In-use emergency engines operated not more than 50 hours per year for maintenance and testing purposes.
5. Emergency engines installed after January 1, 2005

1. Existing compression ignition and spark ignition engine compliance dates
2. Existing landfill gas engines – area source
3. Existing emergency diesel engines – area source
4. Existing non-emergency diesel engines ≤ 300 HP – area source
5. Existing non-emergency diesel engines 300 HP < X ≤ 500 HP – area source
6. Existing non-emergency diesel engines < 500 HP – area source

Section No. 2 Page: 2
Applicable Requirement Code Key
7. Existing non-emergency spark-ignited remote engine > 500 HP – area source
8. Existing non-emergency diesel engines greater than 300 HP at an area source of HAPs that qualify under the national security exemption
9. Existing emergency spark ignited engines
3. PERMITTED THROUGHPUT AND CONSUMPTION LIMIT TABLE

Purpose

The purpose of this table is to list the emissions units at this stationary source that have limitations on throughput, fuel consumption, raw material usage, hours of operation, or other parameters that limit the potential to emit of the emissions unit. In some cases, the limit on the potential to emit is expressed directly as a set of pollutants and emission limits in tons per year.

These limitations are applied pursuant to Rule 26, "New Source Review" or Rule 29, "Conditions on Permits". Two sets of limits are listed in this table. The "Throughput Permit Limit" is the enforceable limit pursuant to this permit. Permit conditions that enforce these limits are listed in Section No. 7, "Permit Specific Conditions" of this permit.

The "Calculation Throughput" is used only to calculate permitted emissions pursuant to Rule 29, "Conditions on Permits".

Equipment Description

This portion of the table is the same as the equipment description in the "Permitted Equipment and Applicable Requirements Table".

Throughput Permit Limit

The throughput or consumption limit listed in this column of the table is an enforceable limit on the emissions unit's potential to emit. In the column labeled "District (D)/ Federal (F) Enforceable", a "D" or an "F" denotes whether the limit is only enforceable by the District or whether the limit is a federally-enforceable limit. District-enforceable limits are limits applied solely pursuant to Rule 29, "Conditions on Permits". Limits that have been applied pursuant to Rule 26, "New Source Review" are federally enforceable.

The throughput permit limit may apply to a single emissions unit or to a set of emission units. When the limit applies to set of emissions units, the set consists of the emissions unit with which the limit is listed and the emissions units which follow that have an asterisk in the throughput permit limit column.

Pursuant to Rule 26 and Rule 29, the throughput permit limit is an annual limit which is enforceable based on a period of any twelve (12) consecutive calendar months.

Note that when the calculation throughput (discussed below) corresponds to using the emissions unit full time (8760 hours per year) at maximum rated capacity, the throughput permit limit column contains the notation "No Limit". When District emission calculation procedures do not involve throughput or consumption data, both the throughput permit limit and the calculation throughput

<table>
<thead>
<tr>
<th>Equipment Description</th>
<th>Throughput Permit Limit</th>
<th>Calculation Throughput</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
column are left blank.

**Calculation Throughput**

The throughput or consumption limit listed in this column of the table is the throughput used in the District calculation procedures to calculate permitted emissions for the emissions unit. The calculation throughput may apply to a single emissions unit or to a set of emissions units denoted as discussed above. The calculation throughput is not an enforceable permit limit.

**Abbreviations**

The following abbreviations have been used in the "Permitted Throughput and Consumption Limit Table" for the "Throughput Permit Limit" column and for the "Calculation Throughput Limit" column:

- BBL/Yr: barrels per year
- Days/Yr: days per year
- FO: fuel oil or diesel fuel
- Gal/Yr: gallons per year
- Hrs/Day: hours per day
- Hrs/Yr: hours per year
- Lbs/day: pounds per day
- Lbs ROC/Yr: pounds of reactive organic compounds per year
- MBBL/Yr: thousands of barrels per year
- MGal/Yr: thousands of gallons per year
- MMBTU/Yr: million British Thermal Units of heat input per year
- MMCF/Yr: million standard cubic feet of natural gas per year
- MMGal/Yr: million gallons per year
- NG: natural gas
- TPY: tons per year
## Table No. 3

**Ventura County Air Pollution Control District**  
Permit to Operate No. 01267  
Permitted Throughput/Consumption Limits

<table>
<thead>
<tr>
<th>Equipment Description</th>
<th>Throughput/Emission Permit Limit</th>
<th>District (D)/Federal (F) Enforceable</th>
<th>Calculation Throughput</th>
<th>Calculation Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 - 255.7 MMBTU/Hr (HIJV) General Electric LM 2500-33 21.5 MW Turbine with a Heat Recovery Boiler. Water Injection and SCR for NOx Control; Natural Gas-Fired with Fuel Oil for Curtailment Situations</td>
<td>Fuel Oil @ 1,080 hr/yr</td>
<td>F</td>
<td>2,089.4 MMCF/Yr NG</td>
<td>Based on offsets provided &amp; 2,004 Mgal/Yr FO</td>
</tr>
<tr>
<td></td>
<td>ROC</td>
<td>14.88 TPY</td>
<td>F</td>
<td></td>
</tr>
<tr>
<td></td>
<td>NOx</td>
<td>33.38 TPY</td>
<td>F</td>
<td></td>
</tr>
<tr>
<td></td>
<td>PM</td>
<td>8.73 TPY</td>
<td>F</td>
<td></td>
</tr>
<tr>
<td></td>
<td>SOx</td>
<td>25.01 TPY</td>
<td>F</td>
<td></td>
</tr>
<tr>
<td></td>
<td>CO</td>
<td>57.59 TPY</td>
<td>F</td>
<td></td>
</tr>
<tr>
<td>1 - 31 MMBTU/Hr Babcock &amp; Wilcox Steam Boiler (FM-3029) with a Coen DAF low NOx Burner; Natural Gas-Fired with Fuel Oil for Curtailment Situations</td>
<td></td>
<td>F</td>
<td>15.5 MMCF/Yr NG</td>
<td>Included in offset provision stated above</td>
</tr>
<tr>
<td></td>
<td>ROC</td>
<td>*</td>
<td>F</td>
<td></td>
</tr>
<tr>
<td></td>
<td>NOx</td>
<td>*</td>
<td>F</td>
<td></td>
</tr>
<tr>
<td></td>
<td>PM</td>
<td>*</td>
<td>F</td>
<td></td>
</tr>
<tr>
<td></td>
<td>SOx</td>
<td>*</td>
<td>F</td>
<td></td>
</tr>
<tr>
<td></td>
<td>CO</td>
<td>*</td>
<td>F</td>
<td></td>
</tr>
<tr>
<td>1 - 31 MMBTU/Hr Babcock &amp; Wilcox Steam Boiler (FM-3030) with a Coen DAF low NOx Burner; Natural Gas-Fired with Fuel Oil for Curtailment Situations</td>
<td></td>
<td>F</td>
<td>15.5 MMCF/Yr NG</td>
<td></td>
</tr>
<tr>
<td></td>
<td>ROC</td>
<td>*</td>
<td>F</td>
<td></td>
</tr>
<tr>
<td></td>
<td>NOx</td>
<td>*</td>
<td>F</td>
<td></td>
</tr>
<tr>
<td></td>
<td>PM</td>
<td>*</td>
<td>F</td>
<td></td>
</tr>
<tr>
<td></td>
<td>SOx</td>
<td>*</td>
<td>F</td>
<td></td>
</tr>
<tr>
<td></td>
<td>CO</td>
<td>*</td>
<td>F</td>
<td></td>
</tr>
<tr>
<td>1 - 755 HP Detroit Diesel Emergency Standby Engine, (565 KW) Model 71637305, Serial No. 16VA19578, &quot;Blackstart&quot;</td>
<td>20 Hrs/Yr (for maintenance and testing)</td>
<td>D</td>
<td>20 Hrs/Yr</td>
<td></td>
</tr>
</tbody>
</table>

* - Included in Limit or Calculation Throughput Above
4. PERMITTED EMISSIONS TABLE

Purpose

The purpose of this table is to document the permitted emissions for this stationary source. Rule 29, "Conditions on Permits", requires permitted emissions to be included on each Permit to Operate. Rule 29 is not federally enforceable.

The permitted emissions table also characterizes the amount and type of criteria air pollutants emitted by this stationary source.

Rule 29 requires that annual permitted emissions be based on a 12 calendar month rolling period and be expressed in units of tons per year. Hourly permitted emissions are required to be expressed in units of pounds per hour. Permitted emissions for a stationary source are required to be determined by aggregating the permitted emissions for each emissions unit at the stationary source.

In general, permitted emissions are calculated based on throughput or consumption data for an emission unit, specific physical characteristics of the emission unit, and emission factors. The emission factors may be standard published emission factors or they may be derived from source test data or specific emission limits that apply to the emissions unit. In some cases, permitted emissions are expressed directly as a set of pollutants and emission limits in tons per year without reference to any calculation method.

Section No. 3, "Permitted Throughput and Consumption Limit Table", contains information on the throughput and consumption limits that are enforceable at this stationary source. In addition, other sections of this permit contain conditions that act to enforce specific portions of the permitted emissions table.

Equipment Description

This portion of the table is the same as the equipment description in the "Permitted Equipment and Applicable Requirements Table".

Tons Per Year

This column of the table represents the permitted emissions in units of tons per year for ROC (reactive organic compounds), NOx (nitrogen oxides), PM (particulate matter), SOx (sulfur oxides), and CO (carbon monoxide). In some cases, emissions of non-criteria pollutants of interest may also be listed. Pursuant to Rule 29, annual permitted emissions shall be the annual emissions used to determine compliance for issuance of any new or revised permit issued after October 22, 1991. For emissions units for which no new or revised permit has been issued since
October 22, 1991, annual permitted emissions generally reflect actual historical emissions from the emissions unit.

The permitted emissions limit may apply to a single emissions unit or to a set of emission units. When the limit applies to set of emissions units, the set consists of the emissions unit with which the limit is listed and the emissions units which follow that have an asterisk in the pollutant columns.

**Pounds Per Hour**

This column of the table represents the permitted emissions in units of pounds per hour for ROC (reactive organic compounds), NOx (nitrogen oxides), PM (particulate matter), SOx (sulfur oxides), and CO (carbon monoxide). Pursuant to Rule 29, hourly permitted emissions shall be calculated based on the maximum quantity of each air pollutant which may be emitted from the emissions unit during a one hour period, as limited by any applicable rules or permit conditions.

**Hazardous Air Pollutants**

This permit does not provide information that characterizes the emissions of hazardous air pollutants (HAPS) from this facility. This information can be obtained from the reissuance application or the facility's AB-2588, Air Toxics "Hot Spots", Report referenced at the bottom of the "Permitted Emissions Table". For Outer Continental Source (OCS) sources and other sources not subject to AB-2588, HAP emissions information is included in the permit reissuance application and is maintained by the stationary source.
<table>
<thead>
<tr>
<th>Equipment</th>
<th>TONS PER YEAR</th>
<th>POUNDS PER HOUR</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>ROG</strong></td>
<td><strong>NOₓ</strong></td>
<td><strong>PM</strong></td>
</tr>
<tr>
<td>1 - 255.7 MMBTU/Hr (HHV) General Electric LM 2500-33</td>
<td>14.78</td>
<td>33.38</td>
</tr>
<tr>
<td>1 - 21 MW Turbine with a Heat Recovery Boiler; Water Injection and SCR for NOₓ Control; Natural Gas-Fired with Fuel Oil for Curtailment Situations</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 - 31 MMBTU/Hr Babcock &amp; Wilcox Steam Boiler (FM-3029) with a Coen DAF low NOₓ Burner; Natural Gas-Fired with Fuel Oil for Curtailment Situations</td>
<td>0.10</td>
<td>*</td>
</tr>
<tr>
<td>1 - 31 MMBTU/Hr Babcock &amp; Wilcox Steam Boiler (FM-3030) with a Coen DAF low NOₓ Burner; Natural Gas-Fired with Fuel Oil for Curtailment Situations</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 - 755 HP Detroit Diesel Emergency Standby Engine, (565 KW) Model 71637305, Serial No. 16VA19578, &quot;Blackstart&quot;</td>
<td>0.02</td>
<td>0.25</td>
</tr>
</tbody>
</table>

* - Included in Emissions Above

| Total Permitted Emissions | 14.90         | 33.63           | 8.73    | 25.01  | 57.64   | 30.10   | 4.42    | 20.57  | 6.68    | 55.04  | 32.72  | 7.34    |

HAP Emissions Ref.: AB 2588 Air Toxics Report

Reporting Year: 1992

Submit Date: 03/07/94

Section No. 4

July 25, 2014
5. EXEMPT EQUIPMENT LIST

Rule 33.2.A.3 (Part 70 Permits - Application Contents) requires the applicant to provide a list of all emissions units located at the stationary source that are exempt pursuant to Rule 23 based on size or production rate. Pursuant to Rule 33.2.A.3, emissions from insignificant activities do not need to be included in the permit application.

This section of the permit contains a table entitled "Insignificant Activities (Exempt Equipment)". This table is a list of insignificant activities (exempt equipment) at the facility that are exempt from permit based on a size or production rate exemption in Rule 23, "Exemptions From Permit". Insignificant Activity is defined in Rule 33.1 (Part 70 Permits – Definitions). The permittee shall provide calculations, usage records, emission records, and/or operational data as necessary to substantiate an activity as insignificant.

This table is presented for informational purposes only. Any changes to this list are not considered to be permit modifications, nor is the list considered to be enforceable. As detailed in Rule 33.2.A.3, this list is required to be submitted with an application for permit reissuance. The general requirements listed in Section No. 8 of this permit may apply to these insignificant activities.
<table>
<thead>
<tr>
<th>INSIGNIFICANT ACTIVITIES (EXEMPT EMISSION UNITS)</th>
<th>BASIS FOR EXEMPTION (Size/Production Rate)</th>
<th>RULE 23 CITATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 – Waste Oil Aboveground Storage Tank (300 Gallons)</td>
<td>Reactive organic compound liquid with a modified Reid vapor pressure of 0.5 psia or less</td>
<td>23.F.21 (71.2.G.1.a and 71.2.G.1.b)</td>
</tr>
<tr>
<td>3 – Lube Oil Systems (1 – 150 gal, 1 – 160 gal, 1 – 900 gal)</td>
<td>Reactive organic compound liquid with a modified Reid vapor pressure of 0.5 psia or less</td>
<td>23.F.21 (71.2.G.1.a and 71.2.G.1.b)</td>
</tr>
<tr>
<td>1 – Cleaner</td>
<td>Cleaning agents certified by the SCAQMD as Clean Air Solvents</td>
<td>23.F.10.a</td>
</tr>
</tbody>
</table>
6. SPECIFIC APPLICABLE REQUIREMENTS (ATTACHMENTS)

As discussed in Section No. 2, "Permitted Equipment and Applicable Requirements Table", the emissions units at this stationary source listed in the table have requirements that are specifically applicable to them. The applicable requirements are based on the District's prohibitory rules, State of California ATCM’s, federal NSPS (40 CFR Part 60), federal NESHAPS (40 CFR Part 61), and federal NESHAPS/MACT (40 CFR Part 63).

In this section of the permit, the permit conditions that are associated with each specific applicable requirement are listed in an individual attachment. The attachment is identified with the label "Attachment (APCD Rule No. or CFR No.) #" in the lower left corner. Each attachment has an applicability section that describes how and why this attachment applies to the specific emissions unit. The attachment may apply to one or more of the emissions units listed in the Permitted Equipment and Applicable Requirements Table in Section No. 2.
Ventura County Air Pollution Control District
Rule 74.9.D.3 Applicable Requirements
Emergency Standby Stationary Internal Combustion Engines
Operated During Either an Emergency or Maintenance Operation

Rule 74.9, "Stationary Internal Combustion Engines"
Adopted 11/08/05, Federally-Enforceable

Applicability:

This attachment applies to emergency standby stationary internal combustion engines rated at 50 or more horsepower, not subject to the provisions of APCD Rule 74.16, "Oilfield Drilling Operations", and operated during an emergency or maintenance operation. Maintenance operation is limited to 50 hours per calendar year. Pursuant to Rule 74.9.D.3, emergency standby stationary internal combustion engines operated during an emergency or during maintenance operation of no more than 50 hours per calendar year are exempt from all provisions of Rule 74.9.

As detailed in Rule 74.9.I.2 an emergency standby engine is defined as an internal combustion engine used only when normal power line or natural gas service fails, or for the emergency pumping of water for either fire protection or flood relief. An emergency standby engine may not be operated to supplement a primary power source when the load capacity or rating of the primary power source has been either reached or exceeded.

Conditions:

1. Pursuant to Section D.3 of Rule 74.9, an applicable emergency standby stationary internal combustion engine shall only be operated during an emergency or during maintenance operation of not more than 50 hours per calendar year.

   Pursuant to Section I.5 of Rule 74.9, a maintenance operation is defined as the use of an emergency standby engine and fuel system during testing, repair and routine maintenance to verify its readiness for emergency standby use.

2. Pursuant to Section D.3 of Rule 74.9, each emergency standby engine shall be equipped with an operating, non-resettable, elapsed hour meter.

3. Pursuant to Section F.1 of Rule 74.9, the Annual Compliance Certification shall include the following records for each emergency standby engine: Engine manufacturer, model number, operator identification number, and location.
4. Pursuant to Section F.2 of Rule 74.9, the annual engine hours of maintenance operation shall be reported annually. A report shall be provided to the District after every calendar year by February 15.
Ventura County Air Pollution Control District
California Airborne Toxic Control Measure For
Stationary Compression Ignition Engines
In-Use Emergency Engines

Section 93115, Title 17, California Code of Regulations, Airborne Toxic Control Measure
For Stationary Compression Ignition (CI) Engines
Effective 05/19/11

The District is required to implement and enforce the state ATCM. The ATCM is not federally-enforceable.

Applicability:

This attachment describes the requirements of California Airborne Toxic Control Measure
(ATCM) For Stationary Compression Ignition (CI) Engines that apply to in-use emergency
standby stationary diesel-fueled CI engines. An “in-use” engine is an engine that was installed at
a facility prior to January 1, 2005. Pursuant to Section 93115.4(a)(30) “Emergency use” means
providing electrical power during the failure or loss of all or part of normal electrical power
service or normal natural gas supply to the facility: (1) which is caused by any reason other than
the enforcement of a contractual obligation the owner or operator has with a third party or any
other party; and (2) which is demonstrated by the owner or operator to the District satisfaction to
have been beyond the reasonable control of the owner or operator. Pursuant to Section
93115.4(a)(8) CARB Diesel Fuel means any diesel fuel that meets the specifications of vehicular
diesel fuel, as defined in title 13, CCR, sections 2281 and 2282. The Verification Procedure is
defined in Section 93115.4(a)(78).

Conditions:

1. Pursuant to subsection 93115.5(a), as of January 1, 2006, the permittee shall not fuel the
   engine with any fuel unless the fuel is one of the following:

   a. CARB Diesel Fuel, or
   b. An alternative diesel fuel that is:
      1) biodiesel;
      2) a biodiesel blend that does not meet the definition of CARB diesel Fuel
      3) a Fischer-Tropsch fuel; or
      4) an emulsion of water in diesel fuel; or
   c. any alternative diesel fuel that is not identified in section 93115.5(a)(2) and meets
      the requirements of the Verification Procedure; or
   d. an alternative fuel; or
   e. CARB Diesel Fuel used with fuel additives that meets the requirements of the
      Verification Procedure; or
2. Pursuant to Section 93115.6(b)(3), as of January 1, 2006, annual hours of operation for maintenance and testing of the emergency engine(s) shall not exceed 20 hours per year. This limit does not include emergency operation as defined in the ATCM. When not being operated for maintenance or testing, the emergency engine(s) shall only be used for “emergency use” as defined in the ATCM.

In order to comply with this condition, the engine(s) shall be equipped with a non-resetable hour meter and the permittee shall maintain a log that differentiates operation during maintenance and testing from emergency use. These records shall be compiled into a monthly total. The monthly operating hour records shall be summed for the previous 12 months.

3. Pursuant to subsection 93115.10(f)(1), the permittee shall keep records and prepare a monthly summary that shall list and document the nature of use for each of the following:

   a. Emergency use hours of operation;
   b. Maintenance and testing hours of operation;
   c. Type of fuel use in the engines. For engines operated exclusively on CARB Diesel Fuel, the owner or operator shall document the use of CARB Diesel Fuel through the retention of fuel purchase records indicating that the only fuel purchased for supply to an emergency standby engine was CARB Diesel Fuel; or for engines operated on any fuel other than CARB Diesel Fuel, the fuel records demonstrating that the only fuel purchased and added to an emergency standby engine or engines, or to any fuel tank directly attached to an emergency standby engine or engines, meets the requirements of section 93115.5(b).
Ventura County Air Pollution Control District
National Emission Standards for Hazardous Air Pollutants
For Stationary Reciprocating Internal Combustion Engines
Existing Emergency Diesel Engines at an Area Source of HAPs


Applicability:

The NESHAP for Stationary Reciprocating Internal Combustion Engines is applicable to all stationary reciprocating internal combustion engines (RICE) at both major and area sources of hazardous air pollutants. The NESHAP is applicable to both compression ignition (CI – diesel) engines and spark ignition (SI – natural gas, landfill gas, gasoline, propane, etc.) engines. The specific conditions below are for existing emergency diesel engines at an area source. An engine is defined as “existing” if it was constructed before June 12, 2006. A stationary source is defined as an “area source” if it is not a major source of HAP (Hazardous Air Pollutants) emissions; meaning the stationary source does not emit or have the potential to emit any single HAP at a rate of 10 tons or more per year or any combination of HAP at a rate of 25 tons or more per year.

Pursuant to Section 63.6640(f) and Section 63.6675, an “emergency engine” is any engine whose operation is limited to emergency situations and required testing and maintenance. An emergency can be the loss of grid power or the stationary source’s own power production. An emergency engine may also participate in an emergency demand response program under limited circumstances. Stationary RICE used for peak shaving or as part of a financial arrangement to supply power into the grid, or as a part of a non-emergency demand response program are not considered emergency stationary RICE.

Pursuant to Section 63.6595(a)(1), the permittee must comply with the applicable operating requirements on and after May 3, 2013.

Conditions:

1. Pursuant to Section 63.6603(a), Table 2d, the permittee shall comply with the following operating requirements:

   a. Change oil and filter every 500 hours of operation or annually, whichever comes first. An oil analysis program as described in Section 63.6625(i) can be utilized in order to extend the specified oil change requirement.

   b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary.
c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

Pursuant to Table 2d, if an emergency RICE is operating during an emergency and it is not possible to perform the above maintenance or if performing the maintenance would otherwise pose an unacceptable risk under federal, state, or local law, the maintenance can be delayed and should be performed as soon as practicable after the emergency has ended or the unacceptable risk has abated. All such maintenance delays shall be reported to the APCD Compliance Division.

2. Pursuant to Section 63.6625(e) and 63.6640(a), Table 6, the permittee shall operate and maintain the stationary RICE according to the manufacturer’s emission-related written instructions or develop your own plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

3. Pursuant to Section 63.6625(f), the RICE shall be equipped with a non-resettable hour meter.

4. Pursuant to Section 63.6625(h), the permittee shall minimize the engine’s time spent at idle during startup and minimize the engine’s startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

5. Pursuant to Sections 63.6640(f) and 63.6675, the permittee shall operate the emergency RICE in compliance with the following requirements:

a. There is no time limit on the use of emergency stationary RICE in emergency situations. An emergency can be the loss of grid power or the stationary source’s own power production.

b. The use of the engine is limited to 100 hours per calendar year for maintenance checks and readiness testing, emergency demand response, 5% or greater voltage or frequency deviation situations, and up to 50 hours per year for non-emergency situations as detailed in Section 63.6640(f)(4). The 50 hours are to be counted in the 100 hours limit.

c. The emergency stationary RICE may be operated up to 50 hours per calendar year for peak shaving as part of a financial agreement to supply power into the grid, or as part of a non-emergency demand response program, until May 3, 2014. After May 3, 2014, the 50 hours per year for non-emergency situations can be used to supply power as part of a financial agreement if all of the requirements of Section 63.6640(f)(4)(ii) are met. The 50 hours per year limit is to be counted towards the 100 hours per year limit.
6. Pursuant to Sections 63.6655(e) and 63.6655(f), the permittee shall maintain the following records:

   a. Records of maintenance conducted on the stationary emergency RICE.

   b. Records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency, and how many hours are spent for non-emergency operation.

7. Beginning January 1, 2015, if the engine is contractually obligated to be available for more than 15 hours per year for emergency demand response, 5% or greater voltage or frequency deviation situations, or for non-emergency situations as detailed in Section 63.6640(f)(4)(i) the engine must use a diesel fuel that meets the requirements in 40 CFR 80.510(b) for non-road diesel fuel. This fuel is commonly known as ultra low sulfur diesel or ULSD. Any diesel fuel purchased (or otherwise obtained) prior to January 1, 2015 may be used until depleted. (Section 63.6604(b))

8. Beginning January 1, 2015, if the engine is contractually obligated to be available for more than 15 hours per year for emergency demand response, 5% or greater voltage or frequency deviation situations, or for non-emergency situations as detailed in Section 63.6640(f)(4)(i) the permittee is required to compile and submit a report as required by Section 63.6650(h). This report includes, but is not limited to, location information, engine information, hours of operation, and fuel requirement deviations. The first annual report must cover calendar year 2015 and must be submitted no later than March 31, 2016. (Section 63.6650(h))

9. On an annual basis, the permittee shall certify that all engines at this stationary source are operating in compliance with 40 CFR Part 63, Subpart ZZZZ, "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Engines" (RICE MACT).
Ventura County Air Pollution Control District
Rule 74.15.B.1 Applicable Requirements
Boilers, Heater Treaters, Steam Generators, and Process Heaters
NOx and CO Emission Limits
Annual Heat Input ≥ 9,000 MMBTU

Rule 74.15, "Boilers, Steam Generators, and Process Heaters"
Adopted 11/08/94, Federally-Enforceable

Applicability:

This attachment applies to boilers, heater treaters, steam generators and process heaters with a maximum heat input rating of greater than or equal to 5 MMBTU/Hr that have operated with an annual heat input rate of greater than or equal to 9,000 MMBTU during any twelve (12) calendar month rolling period. This attachment also applies to any unit operated with an annual heat input rate of less than 9,000 MMBTU that is equipped with low NOx burners or other such equipment to comply with the NOx and CO requirements of Rule 74.15.B.1. A heat input of 9,000 MMBTU is equivalent to 90,000 therms and equivalent to 8.57 million cubic feet of natural gas at a higher heating value of 1,050 BTU/ cf.

A boiler, steam generator or process heater is any external combustion equipment fired with liquid and/or gaseous fuel. A boiler or a steam generator is further defined as equipment used to produce steam or to heat water. Boiler or steam generator does not include any unfired waste heat recovery boiler that is used to recover sensible heat from the exhaust of any combustion equipment. A process heater is further defined as equipment that transfers heat from combustion gases to water or process streams. Process heater does not include any kiln or oven used for drying, baking, cooking, calcining or vitrifying, or any fuel-fired degreasing or metal finishing equipment. Annual heat input is defined as the actual amount of heat released by fuels burned in a unit during a twelve (12) calendar month rolling period, based on the higher heating value of the fuel. The annual heat input shall be calculated as the sum of the previous 12 monthly fuel use rates multiplied by the higher heating value of the fuel.

Conditions:

1. Pursuant to Rule 74.15.B.1, emissions from an applicable emission unit shall not exceed the following limits:
   a. Oxides of Nitrogen (NOx expressed as NO₂): 40 ppmvd
   b. Carbon Monoxide (CO): 400 ppmvd

These limits shall be referenced at three (3) percent volume stack gas oxygen on a dry basis averaged over 15 consecutive minutes. Compliance with this condition shall be verified every 24 months by source testing.
2. Pursuant to Rule 74.15.B.1, an applicable emission unit shall be source tested not less than once every 24 months (biennially) utilizing the following methods as detailed in Rule 74.15.E:

a. NOx ARB Method 100
b. CO ARB Method 100
c. Stack Gas Oxygen ARB Method 100

Pursuant to Rule 74.15.E.2, emission tests shall be conducted on units in "as-found" operating condition. However, no emission test for Rule 74.15 shall be conducted during start-up, shutdown or under breakdown conditions. Prior to conducting a biennial emissions test, permittee shall notify the District Compliance Division. Written notification, and a source test protocol subject to District approval, shall be received no less than 15 calendar days prior to the test. The emissions test report and results shall be submitted to the District Compliance Division within 45 days after the test.

3. Pursuant to Rule 74.15.C.2, the emission limits of Rule 74.15.B.1 shall not apply to any unit operated on alternate fuel under the following conditions:

a. Alternate fuel is required due to the curtailment of natural gas service to the individual unit by the natural gas supplier. Alternate fuel use in this case shall not exceed the period of natural gas curtailment.

b. Alternate fuel use is required to maintain the alternate fuel system. Alternate fuel use in this case shall not exceed 50 hours per year.

4. Pursuant to Rule 74.15.C.4, the emission limits of Rule 74.15.B.1 shall not apply during the cold startup of an applicable unit. For units with a rated heat input capacity of equal to, or greater than, one hundred (100) million BTUs per hour, the duration of this exemption shall not exceed three (3) hours. For units with a rated heat input capacity of less than one hundred (100) million BTUs per hour, the duration of this exemption shall not exceed one (1) hour.

5. Permittee shall record and maintain the following information:

a. Daily records of alternate fuel consumption as required by Rule 74.15.D.3. Each record shall include the type of fuel, the quantity of fuel, and the duration of the occurrence; and

b. The biennial source test report.

This information shall be submitted to the District upon request.
6. If the emission unit is equipped with an external flue gas recirculation (FGR) system for the control of nitrogen oxides, permittee shall also comply with the FGR monitoring and recordkeeping requirements in the Permit Specific Conditions (Attachments) presented in Section No. 7 of this permit.
Ventura County Air Pollution Control District
GE LM 2500-33 Gas Turbine Based Cogeneration Unit
NO\textsubscript{x} and NH\textsubscript{3} Applicable Requirements
Including Streamlined NO\textsubscript{x} Requirements

Rule 26, “New Source Review”
Conditions applied pursuant to Rule 26 are Federally Enforceable

Rule 74.23, "Stationary Gas Turbines"
Adopted 01/08/02, Federally Enforceable

Rule 103, “Stack Monitoring”
Adopted 02/09/99, Federally Enforceable

40 CFR Part 60, “Standards of Performance for New Stationary Sources” (NSPS)
40 CFR Part 60, Subpart GG, "Standards of Performance for Stationary Gas Turbines"
Federally Enforceable

**Applicability:**

This attachment applies to the nitrogen oxides (NO\textsubscript{x} measured as NO\textsubscript{2}) and ammonia (NH\textsubscript{3}) emissions at the gas turbine based cogeneration unit, consisting of a General Electric LM 2500-33 gas turbine with heat recovery boiler. This attachment describes and streamlines the most stringent requirements of Rule 26, “New Source Review” BACT (Best Available Control Technology) requirements; Rule 74.23, “Stationary Gas Turbines”; Rule 103, “Stack Monitoring”; and 40 CFR Part 60, Subpart GG, “Standards of Performance for Stationary Gas Turbines” (NSPS). The Ventura County APCD has been delegated authority for 40 CFR Part 60 Subpart GG and is considered to be the Administrator.

As shown on the attached table, the Rule 26 BACT NO\textsubscript{x} emission limit is the most stringent in comparison to the Rule 74.23 and NSPS NO\textsubscript{x} emission limits; therefore the Rule 74.23 and NSPS emission limits are subsumed. The monitoring requirements of District Rule 74.23 and 103 are more stringent than the NSPS requirements; therefore the NSPS monitoring, recordkeeping, reporting, and test method requirements are subsumed by the requirements of Rules 74.23 and 103.

Compliance with the terms and conditions of the streamlined NO\textsubscript{x} and NH\textsubscript{3} requirements for the cogeneration unit assures compliance with all individual NO\textsubscript{x} and NH\textsubscript{3} applicable requirements pertaining to the cogeneration unit which have been addressed in the streamline analysis. The attached table details the determination of this permit shield for the cogeneration unit which consists of a General Electric LM 2500-33 natural gas-fired turbine that drives a 21.5 MW electrical generator.

Section No. 6
Attachment STRMLN1267LM2500-NO\textsubscript{x}NH\textsubscript{3}
Conditions:

1. The stack outlet concentration of Nitrogen Oxides (NO\textsubscript{x} expressed as NO\textsubscript{2}) shall not exceed 9 ppmvd, while burning natural gas or fuel oil, referenced at fifteen (15) percent volume stack gas oxygen on a dry basis, and averaged over any three consecutive hours. This is a Rule 26 BACT requirement (Authority to Construct No. 1267-2, January 30, 1986) and is more stringent than Rule 74.23 and 40 CFR Part 60 Subpart GG. Compliance with this condition shall be verified by an annual source test, as specified in Condition No. 5 of this attachment, and by maintaining the continuous emission monitoring and control system operating parameter monitoring, as specified in Condition No. 6 of this attachment.

2. The water injection system and the selective catalytic reduction system shall be operated as necessary to achieve the NO\textsubscript{x} limitations of this permit. The water injection rate and the ammonia injection rate shall be controlled by the gas turbine control system at all times during the operation of the turbine.

3. Pursuant to Rule 74.23.C.1.e, the NO\textsubscript{x} emission limits listed Condition No. 1 above, and the control system requirements provided in Condition No. 2 above, shall not apply to the cogeneration unit during the thermal stabilization period associated with a start-up, planned shutdown, or unplanned load change. These exemption periods shall not exceed one (1) hour. For failed start-ups, each restart shall begin a new exemption period.

4. Pursuant to Rule 74.23.B.4, the stack outlet concentration of ammonia (NH\textsubscript{3}) shall not exceed 20 ppmvd, referenced at fifteen (15) percent volume stack gas oxygen on a dry basis. Compliance with this condition shall be verified by an annual source test, as specified in Condition No. 5 of this attachment.

5. Pursuant to Rule 74.23.B.1, the cogeneration unit shall be source tested not less than once every 12 months (annually) utilizing the following methods:

   a. NO\textsubscript{x} EPA Method 20
   b. Oxygen content ARB Method 100
   c. Gaseous fuel heating value ASTM Method D 1826-88
   d. Fuel oil heating value ASTM Method D 240-87
   e. NH\textsubscript{3} BAAQMD Method ST-1B (Jan. 20, 1982)

The average of three source test runs shall be used to determine compliance. The tests shall be conducted at normal operating load.

Prior to conducting an annual emissions test, permittee shall notify the APCD Compliance Division. Written notification and a source test protocol, subject to District approval, shall be received no less than 15 calendar days prior to the test. The emissions
test report shall indicate the following parameters at normal load: emissions of NOx and 
NH3 in parts per million by volume on a dry basis; parts per million by volume corrected 
to 15% oxygen on a dry basis; pounds per hour; the amount of excess oxygen in percent 
by volume; and the fuel and exhaust flow rates, in standard cubic feet per minute. In 
addition, pursuant to Rule 74.23.B.2, the permittee shall provide documentation, 
including a certified source test, correlating the control system operating parameters to 
the associated measured NOx emissions. This information may be used by the District to 
determine compliance when the continuous emission monitoring system is not operating 
properly. These control system operating parameters include, but are not limited to, the 
water injection rate in pounds per hour and the water to fuel ratio, the ammonia injection 
rate, and the ammonia to NOx mole ratio entering the SCR unit. The test report shall also 
include data to show that the continuous emissions monitors and recorders accurately 
estimate emissions and concentration limits. The test report and results shall be 
submitted to the APCD Compliance Division within 45 days after the test. The testing 
may be performed while burning natural gas only if distillate fuel oil has not been burned 
in the gas turbine since the previous test.

6. Pursuant to Rule 74.23.B.2 and Rule 103.A.4, the permittee shall provide, properly 
install, maintain in good working order, operate, and calibrate, in accordance with 
manufacturers specifications, continuous monitoring systems at the gas turbine to 
continuously monitor, calculate where appropriate, and record the following data and 
control system operating parameters:

   a. Monthly fuel consumption;
   b. The ratio of the amount of water injected into the gas turbine’s combustor to the 
      amount of fuel consumed by the gas turbine;
   c. The ammonia to NOx mole ratio entering the SCR reactor;
   d. The concentration of NOx in ppmvd, corrected to 15% oxygen, in the heat 
      recovery boiler (turbine exhaust stack);
   e. The NOx emissions in tons summed for the previous 12 months; and
   f. The elapsed time of operation.

Pursuant to Rule 74.23.D.1, these records shall be available for inspection by the District 
upon request. The continuous monitoring systems used for measuring the control system 
operating parameters shall be accurate to within plus or minus 5.0 percent.

7. Pursuant to Rule 103.C.4, the continuous emission monitoring system shall be installed, 
calibrated, and maintained in accordance with the specifications in 40 CFR, Part 51, 
Appendix P, Sections 3.0 through 3.9.5. As stated in 40 CFR, Part 51, Appendix P, 
Section 3.1; the continuous monitoring systems shall comply with the following 
Performance Specifications:


As an alternative, as detailed in Rule 103.C.4, the continuous emission monitoring system shall be installed, calibrated, and maintained in accordance with other specifications established by the District.

8. Pursuant to Rule 103.B.1, the permittee shall report any violation of any emission standard with which the gas turbine is required to comply, as indicated by the records of the monitoring device. The report shall be in writing to the District Compliance Division within 96 hours after such occurrence. The District shall, in turn, report the violation to the state within five working days after receiving the report of the violation from the permittee.

9. Pursuant to Rule 103.B.2, the permittee shall maintain permanent continuous emission monitoring records. The records shall be in a form suitable for inspection, shall be made available to the Air Resources Board or the District upon request, and shall include:

a. The date, time and duration of any startup, shutdown or malfunction in the operation of any affected facility.

b. The results of performance testing, evaluations, calibrations, checks, adjustments, and maintenance of any continuous emission monitors that have been installed pursuant to Rule 103.

c. Emission measurements.

10. Pursuant to Rule 103.B.4, the permittee shall, upon written notice from the District Compliance Division, provide a summary of the data obtained from the continuous monitoring systems. The format of the summary shall be approved in writing by the District Compliance Division.

11. Pursuant to Rule 103.B.5, continuous emission monitoring data shall be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods determined to be equivalent by the District, the Air Resources Board, and the Environmental Protection Agency.

12. Permittee shall maintain records of all maintenance operations, periodic inspections, and repairs performed on the gas turbine, air pollution control system, and continuous emissions monitors. Permittee shall also maintain records and copies of all source test reports and any violations on exceedances of the limits shown in the conditions of this Permit to Operate. These records shall be made available for inspection by the District upon request.
13. Pursuant to Rule 74.23.E, the permittee shall submit a report to the District Compliance Division that contains the following information:

   a. Actual fuel consumption or operating hours during the previous twelve (12) months; and
   b. A copy of the required annual source test report and control system operating parameter information.
NO\textsubscript{x} and NH\textsubscript{3} Streamlining Comparison
LM 2500-33 Gas Turbine Based Cogeneration Unit, PO No. 01267
(Most Stringent Requirements Shaded)

<table>
<thead>
<tr>
<th>WORK PRACTICE STDS.</th>
<th>RULE 74.23 AND RULE 103</th>
<th>NSPS SUBPART GG</th>
<th>RULE 26 NSR - BACT</th>
</tr>
</thead>
<tbody>
<tr>
<td>None</td>
<td>None</td>
<td>None</td>
<td>BACT</td>
</tr>
<tr>
<td>NO\textsubscript{X} EMISSION LIMIT</td>
<td>Rule 74.23.B.1</td>
<td></td>
<td>BACT</td>
</tr>
<tr>
<td>Natural Gas with SCR: 9 x E/25 = 12 ppmvd @ 15% O\textsubscript{2}</td>
<td>E = Unit Efficiency = 32</td>
<td>STD = 0.015x (14.4)/Y + F</td>
<td>9 ppmvd @ 15% O\textsubscript{2} (this limit applies to both natural gas and fuel oil)</td>
</tr>
<tr>
<td>Fuel Oil with SCR: 25 x E/25 = 38 ppmvd @ 15% O\textsubscript{2}</td>
<td>E = Unit Efficiency = 38</td>
<td>STD is allowable % NO\textsubscript{x} by vol @ 15% O\textsubscript{2} with no allowances for unit efficiency (Y) or fuel bound nitrogen (F):</td>
<td></td>
</tr>
<tr>
<td>NH\textsubscript{3} EMISSION LIMIT</td>
<td>Rule 74.23.B.4</td>
<td>None</td>
<td>BACT</td>
</tr>
<tr>
<td>20 ppmvd @ 15% O\textsubscript{2}</td>
<td>Rule 74.23</td>
<td></td>
<td>Identical to Rule 74.23</td>
</tr>
<tr>
<td>MONITORING</td>
<td>Source test annually for NO\textsubscript{x}, NH\textsubscript{3} and O\textsubscript{2} content (74.23.B.1);</td>
<td>60.334</td>
<td>BACT</td>
</tr>
<tr>
<td></td>
<td>Monitor NO\textsubscript{x} directly w/ CEM (74.23.B.2.c);</td>
<td>Continuously monitor fuel consumption and ratio of water (steam) to fuel (system accurate to ± 5.0%) (60.334(a));</td>
<td>Identical to Rule 74.23</td>
</tr>
<tr>
<td></td>
<td>Monitor control system operating parameters and elapsed time of operation (74.23.B.2);</td>
<td>Monitor nitrogen content of fuel daily or as approved by Administrator (District is Administrator, and does not give a fuel bound nitrogen allowance in limit) (60.334(b))</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Rule 103</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Monitor NO\textsubscript{x} directly w/ CEM (103.A.4);</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>CEM, maintained per 40 CFR, Part 51, Appendix P, 3.0.3.9.5 &amp; Part 60 Appendix B, Performance Spec 2 (103.C.4)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
**NO\textsubscript{x} and NH\textsubscript{3} Streamlining Comparison (Continued)**  
LM 2500-33 Gas Turbine Based Cogeneration Unit, PO No. 01267  
(Most Stringent Requirements Shaded)

<table>
<thead>
<tr>
<th>RULE 74.23 AND RULE 103</th>
<th>NSPS SUBPART GG</th>
<th>RULE 26 NSR - BACT</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>RECORDKEEPING</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rule 74.23.D.1</td>
<td>60.334(a)</td>
<td>BACT</td>
</tr>
<tr>
<td>Continuous records of monitoring requirements specified above (103.B.2)</td>
<td>Continuous records of the water (or steam) to fuel ratio</td>
<td>Identical to Rule 74.23</td>
</tr>
<tr>
<td>Rule 103</td>
<td>60.7</td>
<td></td>
</tr>
<tr>
<td>NO\textsubscript{x} CEM records, etc., reduce per 40 CFR Part 51</td>
<td>Record startups, shutdowns, and malfunctions of unit and control device (60.7(b))</td>
<td></td>
</tr>
<tr>
<td>Appendix P, 5.0-5.3.3 (103.B.5)</td>
<td>Maintain file of all measurements, etc. (60.7(i))</td>
<td></td>
</tr>
</tbody>
</table>

| **REPORTING**            | NO\textsubscript{x} (60.334(a)(1)) | BACT |
| 74.23.E                  | Report exceedances of the water (steam) to fuel ratio which has been determined to demonstrate compliance with the NO\textsubscript{x} limit | None |
| Actual annual fuel consumption or operating hours | Report exceedances of the fuel bound nitrogen content allowed by the fuel-bound nitrogen allowance used during the performance test |                   |
| Annual source test report | |                   |
| Rule 103                 | |                   |
| Report NO\textsubscript{x} emission limit exceedances to the District within 96 hours (103.B.1) | |                   |
| Provide a summary of the CEM data, upon written request from the District Compliance Division (103.B.4) | |                   |

| **TEST METHODS**         | 60.335(a)(2) | BACT |
| 74.23.E                  | NO\textsubscript{x} - EPA Method 20 | Identical to Rule 74.23 |
| NO\textsubscript{x} - EPA Method 20 | | |
| O\textsubscript{2} content - ARB Method 100 | NO\textsubscript{x} - EPA Method 20 | |
| Gaseous fuel HHV - ASTM Method D 1826-88 | O\textsubscript{2} Content - EPA Method 20 | |
| Fuel oil HHV - ASTM Method D 240-87 | 60.335(a) | |
| NH\textsubscript{3} - BAAQMD Method ST-1B, 1/20/82 | nitrogen content of fuel - a method approved by the Administrator (District) that is accurate to within 5% | |
Ventura County Air Pollution Control District
GE LM 2500-33 Gas Turbine Based Cogeneration Unit
SO$_{x}$, Applicable Requirements - Streamlined
Natural Gas and Distillate Fuel Oil Limits

Rule 26, “New Source Review”
Conditions applied pursuant to Rule 26 are Federally Enforceable

Rule 54, “Sulfur Compounds”
Federally Enforceable, Adopted 06/14/94
District Enforceable Version Adopted 01/14/14

This permit attachment lists the requirements of the January 14, 2014 version of the rule. Compliance with this attachment will ensure compliance with both versions of Rule 54. The permit conditions below, therefore, are federally enforceable. The District-enforceable version of this rule will become federally enforceable when approved by the EPA as part of the SIP.

Rule 64, “Sulfur Content of Fuels”
Adopted 04/13/99, Federally-Enforceable

40 CFR Part 60, “Standards of Performance for New Stationary Sources” (NSPS)
40 CFR Part 60, Subpart GG, "Standards of Performance for Stationary Gas Turbines"
Federally-Enforceable

Applicability:

This attachment applies to the sulfur oxides (SOx measured as SO2) emissions at the gas turbine based cogeneration unit, consisting of a GE LM 2500-33 gas turbine with heat recovery boiler. This attachment describes and streamlines the most stringent sulfur content of fuel and SO$_x$ emissions at the point of discharge requirements of Rule 26, “New Source Review” BACT (Best Available Control Technology) requirements; Rule 54, “Sulfur Compounds”; Rule 64, “Sulfur Content of Fuels”; and 40 CFR Part 60, Subpart GG, “Standards of Performance for Stationary Gas Turbines” (NSPS). The Ventura County APCD has been delegated authority for 40 CFR Part 60 Subpart GG and is considered to be the Administrator.

As detailed in the attached tables, the Rule 64 fuel sulfur content limits for gaseous fuel combustion are the most stringent in comparison to the Rule 26, Rule 54, and NSPS Subpart GG SO$_x$ emission limits and sulfur content limits; and the Rule 26 BACT fuel sulfur content limit for distillate fuel oil is the most stringent in comparison to the Rule 54, Rule 64, and NSPS Subpart GG SO$_x$ emission limits and sulfur content limits. Rule 26, Rule 64, and NSPS Subpart GG require monitoring of the fuel sulfur content at the discretion of the District. Therefore, for gaseous fuels, the Rule 26, the Rule 54, and the NSPS Subpart GG SO$_x$ emission limits,
monitoring, recordkeeping, reporting, and test methods requirements are subsumed by Rule 64; for distillate fuel oil, the Rule 54, the Rule 64, and the NSPS Subpart GG SO\textsubscript{x} emission limits, monitoring, recordkeeping, reporting, and test methods requirements are subsumed by Rule 26.

Compliance with the terms and conditions of the streamlined SO\textsubscript{x} requirements for the cogeneration unit assures compliance with all individual SO\textsubscript{x} applicable requirements pertaining to the cogeneration unit which have been addressed in the streamline analysis. The attached table details the determination of this permit shield for the cogeneration unit which consists of an LM 2500-33 natural gas-fired turbine that drives a 21.5 MW electrical generator.

**Conditions:**

1. Pursuant to Rule 64.B.1, no person shall burn at any time gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel (788 ppmv), calculated as hydrogen sulfide at standard conditions, unless specifically exempted by Rule 64.

2. If only Public Utilities Commission-regulated natural gas, propane, or butane is combusted by the gas turbine, it will be assumed that the permittee is complying with Rule 64 without additional periodic monitoring requirements.

3. If other than Public Utilities Commission-regulated natural gas, propane, or butane is being combusted by the gas turbine, the permittee shall analyze the sulfur content of the fuel on an annual basis using South Coast AQMD Method 307-94 - Determination of Sulfur in a Gaseous Matrix or by ASTM D1072-90 (1994), Standard Test Method for Total Sulfur in Fuel Gases. This annual fuel analysis shall be maintained at the facility and shall be provided to the District with the annual compliance certification.

4. When burning distillate fuel oil in the gas turbine, the fuel oil shall not have a sulfur content in excess of 0.17 percent, by weight. This is a Rule 26 BACT requirement (Authority to Construct No. 1267-2, January 30, 1986) and is more stringent than Rules 54 and 64, and 40 CFR Part 60 Subpart GG.

5. For each distillate fuel oil delivery, the permittee shall record the date and amount delivered, and shall either obtain the fuel supplier's certification, or test the sulfur content of the fuel using ASTM Method D4294-98 or D2622-98, to ensure that compliance with Rule 26 is being maintained. The fuel sulfur content by weight data shall be maintained at the facility and shall be provided with the annual compliance certification.

6. Pursuant to Rule 54, no person shall discharge sulfur compounds, which would exist as a liquid or gas at standard conditions, in excess of 300 ppm by volume from any combustion operation, calculated as sulfur dioxide (SO\textsubscript{2}) by volume, corrected to 15% oxygen, at the point of discharge.

Section No. 6
Attachment STRMLN1267LM2500-SO\textsubscript{x}
In order to comply with Rule 54, permittee shall comply with the fuel sulfur content limits of Rule 64 for natural gas, and Rule 26 for distillate fuel oil. No additional periodic monitoring requirements for Rule 54 are required beyond the periodic monitoring requirements of Rules 64 and 26.

7. Upon District request, sulfur compounds at the point of discharge shall be determined by source testing using EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or South Coast AQMD Test Method 307-91 (Determination of Sulfur in a Gaseous Matrix), as appropriate.
SO\textsubscript{x} Streamlining Comparison
LM 2500-33 Gas Turbine Based Cogeneration Unit, PO No. 01267
Natural Gas Combustion
(Most Stringent Requirements Shaded)

<table>
<thead>
<tr>
<th>WORK PRACTICE STANDARDS</th>
<th>RULE 54</th>
<th>RULE 64</th>
<th>NSPS SUBPART GG</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>None</td>
<td>Rule 64.B.1</td>
<td>60.333(a)</td>
</tr>
<tr>
<td>EMISSION LIMIT</td>
<td>Rule 54.B.1</td>
<td>≤ 300 ppmv</td>
<td>≤ 0.015% vol @ 15% O\textsubscript{2} on a dry basis</td>
</tr>
<tr>
<td></td>
<td>(Equivalent EF = 1612.8 lb SO\textsubscript{X}/mmcf @ 15% O\textsubscript{2})</td>
<td>Sulfur Compounds ≤ 50 grains per 100 ft\textsuperscript{3} (788 ppmv) calculated as H\textsubscript{2}S @ standard conditions</td>
<td>(0.015% vol = 150ppmv)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(Equivalent EF = 1345 lb SO\textsubscript{X}/mmcf)</td>
<td>(Equivalent EF = 806.4 lb SO\textsubscript{X}/mmcf)</td>
</tr>
<tr>
<td>MONITORING</td>
<td>PUC-quality natural gas - None</td>
<td>PUC-quality natural gas - None</td>
<td>60.334(b)</td>
</tr>
<tr>
<td></td>
<td>Non-PUC quality natural gas - Annual analysis of fuel sulfur content</td>
<td>Non-PUC quality natural gas - Annual analysis of fuel sulfur content</td>
<td>PUC-quality natural gas - None, as approved by the District (Administrator)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Non-PUC quality natural gas - Monitor sulfur content of fuel annually, as approved by the District (Administrator)</td>
</tr>
</tbody>
</table>
## SO\textsubscript{x} Streamlining Comparison (Continued)
LM 2500-33 Gas Turbine Based Cogeneration Unit, PO No. 01267
Natural Gas Combustion
(Most Stringent Requirements Shaded)

<table>
<thead>
<tr>
<th>RULE 54</th>
<th>RULE 64</th>
<th>NSPS SUBPART GG</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>RECORDKEEPING</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PUC-quality natural gas - None</td>
<td>PUC-quality natural gas - None, as approved by the District (Administrator)</td>
<td></td>
</tr>
<tr>
<td>Non-PUC quality natural gas - Maintain records of annual fuel analyses</td>
<td>Non-PUC quality natural gas - Maintain records of annual fuel analyses</td>
<td>Non-PUC quality natural gas - Maintain records of annual fuel analyses, as approved by the District (Administrator)</td>
</tr>
<tr>
<td><strong>REPORTING</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Provide fuel records to the District upon request</td>
<td>Provide fuel records to the District upon request</td>
<td>(60.334(c)(2)) Provide fuel records to the District upon request, as approved by the District (Administrator)</td>
</tr>
<tr>
<td><strong>TEST METHODS</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rule 54.D.1</td>
<td>Rule 64.E</td>
<td>60.335(c)(3)</td>
</tr>
<tr>
<td>SO\textsubscript{x} - EPA Methods 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD Method 307-91</td>
<td>Sulfur content of gaseous fuels - SCAQMD Method 307-91</td>
<td>SO\textsubscript{x} - EPA Method 20</td>
</tr>
<tr>
<td></td>
<td></td>
<td>O\textsubscript{2} Content - EPA Method 20</td>
</tr>
<tr>
<td></td>
<td></td>
<td>60.335(d)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Sulfur content of gaseous fuels - ASTM D 1072-80, D 3031-81, D 4084-82, or D 3246-81</td>
</tr>
</tbody>
</table>
SO\(_x\) Streamlining Comparison
LM 2500-33 Gas Turbine Based Cogeneration Unit, PO No. 01267
Fuel Oil Combustion

(Most Stringent Requirements Shaded)

<table>
<thead>
<tr>
<th>WORK PRACTICE STANDARDS</th>
<th>RULE 54</th>
<th>RULE 64</th>
<th>NSPS SUBPART GG</th>
<th>RULE 26 NSR - BACT</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>None</td>
<td>None</td>
<td>None</td>
<td>Fuel shall only be burned during periods of natural gas supply curtailment, periodic fuel distribution system testing, and source testing</td>
</tr>
</tbody>
</table>

| EMISSION LIMIT | Rule 54.B.1  
\(\leq 300\) ppmv  
\((\geq 3)\%\) \(O_2\)  
\((\geq 15\%)\) \(O_2\)  
\(EF = 75.3\) lb \(SO_2/Mgal\)  
\((\geq 15\%)\) \(O_2\)  
\(EF = 228.5\) lb \(SO_2/Mgal\) | Rule 64.B.2  
Sulfur content of fuel: 0.5 \(\%\) \(S\) by wt.  
\((EF = 72.0\) lb \(SO_2/Mgal\)) | 60.333(a)  
\(\leq 0.015\%\) vol @ 15\% \(O_2\), dry basis  
\((0.015\%\) vol = 150ppmv)  
\((EF = 114.2\) lb \(SO_2/Mgal\)) OR  
Rule 60.333(b)  
Sulfur content of fuel = 0.8 \(\%\) \(S\)  
\((EF = 115.2\) lb \(SO_2/Mgal\)) | Sulfur content of fuel: 0.17 \(\%\) \(S\) by wt.  
\((EF = 24.5\) lb \(SO_2/Mgal\)) |

| MONITORING | None specified | For each delivery, obtain fuel supplier’s certification or test for sulfur content. | 60.334(b) Test bulk storage sulfur content on each occasion that fuel is transferred to the storage tank from any other source | For each delivery, obtain date and amount delivered; lab analyses or supplier’s statements of sulfur content; submit summary of efforts taken to obtain the lowest \(\%\) \(S\) |

| RECORDKEEPING | Maintain records of fuel analyses | Maintain records of certifications and fuel analyses | Maintain records of fuel analyses | Maintain records of fuel analyses, and reason for firing fuel oil rather than natural gas |

| REPORTING | Provide fuel sulfur content records to the District upon request | Provide fuel sulfur records to the District upon request and with the annual compliance certification | (60.334(c)(2) Provide fuel sulfur content records to the District upon request | Provide fuel sulfur content records to the District and EPA upon request |

| TEST METHODS | Rule 54.D.1  
\(SO_2\)- EPA Methods 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD Method 307-91 | Rule 64.E.2  
Sulfur content of liquid fuels - ASTM Method D4294-98 or D2622-98 | 60.335(d)  
Sulfur content of liquid fuels - ASTM D 2880-71 | Same as Rule 64.D.2 |
7. PERMIT SPECIFIC CONDITIONS (ATTACHMENTS)

As discussed in Section No. 2, “Permitted Equipment and Applicable Requirements Table”, the emissions units at this stationary source listed in the table have requirements that are specifically applicable to them. The applicable requirements are primarily based on Rule 26, “New Source Review” requirements (e.g., BACT and offset requirements), or Rule 29, “Conditions on Permits” requirements (e.g., throughput recordkeeping requirements, specific requirements that limit emissions, etc.). These requirements are in addition to the specific applicable requirements listed in Section No. 6.

In this section of the permit, the permit conditions that are associated with each specific applicable requirement are listed in an individual attachment. The attachment is identified with the label “Attachment PO (Title V Permit No.) PC#” in the lower left corner. Each attachment has an applicability section that describes how and why this attachment applies to the specific emissions unit. The attachment may apply to one or more of the emissions units listed in the Permitted Equipment and Applicable Requirements Table in Section No. 2.
Ventura County Air Pollution Control District
Additional Permit Requirements

Rule 26, “New Source Review”

Rule 29, “Conditions on Permits”

Conditions applied pursuant to Rule 26 are federally enforceable and conditions applied pursuant to Rule 29 are District enforceable only.

Applicability:

This attachment applies to the entire stationary source. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. In order to comply with the throughput and consumption limits of this permit, the permittee shall maintain monthly records of throughput and consumption as detailed in Section No. 3, “Permitted Throughput and Consumption Limit Table”, of this permit. The monthly records shall be summed for the previous 12 months. Throughput or consumption totals for any of these 12 calendar month rolling periods in excess of the specified limit shall be considered a violation of this permit. This is a general throughput and consumption recordkeeping condition and applies unless another throughput and consumption recordkeeping condition appears in this section of the permit. (Rule 26)

2. Pursuant to Rule 23.F.7, the use of solvents, in addition to the use of coatings, adhesives, lubricants, and sealants, for facility and building maintenance and repair is exempt from permit. However, the use of such materials by contractors for the maintenance and repair of process and industrial equipment is not exempt from permit pursuant to Rule 23.F.7, unless the material is exempted under another specific section of Rule 23. Pursuant to Rule 23.F.6, the use of non-refillable aerosol cans is exempt from permit. Pursuant to Rule 23.F.10, the use of cleaning agents certified by the SCAQMD as Clean Air Solvents (Rule 23.F.10.a) and the use of cleaning agents that contain no more than 25 grams per liter of ROC as used or applied, and no more than 5 percent by weight combined of methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, and chloroform (Rule 23.F.10.b), is also exempt from permit. Pursuant to Rule 23.F.10.d, solvent cleaning where less than 200 pounds each of ROC, methylene chloride, 1,1,1 trichloroethane, and perchloroethylene are lost to the atmosphere during any rolling period of 12 consecutive calendar months is exempt. This permit does not limit the usage of acetone. Acetone is exempt from permit and record keeping requirements, as it is not defined as a reactive organic compound.
In order to substantiate the solvent use exemptions listed above, the permittee shall maintain a list of all exempt solvents used at the stationary source, a reference to the specific permit exemption status, and their ROC content and pounds used per rolling 12 month period, as necessary.

(Rule 29)
Ventura County Air Pollution Control District  
Additional Permit Requirements  
Combustion Emissions Units  

Rule 74.15, “Boilers, Steam Generators, and Process Heaters”  
Adopted 11/08/94, Federally-Enforceable  

Rule 26, “New Source Review”  

Rule 29, “Conditions on Permits”  

Conditions applied pursuant to Rule 26 are federally enforceable and conditions applied pursuant to Rule 29 are District enforceable only.  

Applicability:  

This attachment applies to the combustion units at this stationary source. The combustion units are the one (1) 255.7 MMBTU/Hr GE LM 2500-33 gas turbine, and the two (2) 31.0 MMBTU/Hr Babcock & Wilcox steam boilers. These requirements are in addition to any other specific or general requirements referenced in this permit.  

Conditions:  

1. As stated in Section No. 3 of this permit, “Permitted Throughput and Consumption Limit Table”, the combined annual emissions from the one (1) GE LM 2500-33 gas turbine and the two (2) 31.0 MMBTU/Hr Babcock & Wilcox steam boilers shall not exceed the following limits:  

<table>
<thead>
<tr>
<th>Tons per Year:</th>
<th>ROC</th>
<th>NOx</th>
<th>PM</th>
<th>SOx</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>14.88</td>
<td>33.38</td>
<td>8.73</td>
<td>25.01</td>
<td>57.59</td>
</tr>
</tbody>
</table>

In order to comply with this condition, the permittee shall maintain a rolling twelve month total of ROC, NOx, PM, SOx, and CO emissions from the above units. The permittee shall record the monthly fuel consumption at each of the above units and shall maintain a rolling twelve month record of NOx emissions from the turbine as recorded by the continuous emissions monitoring system (CEM). The monthly fuel consumption records shall be used with the following emission factors to calculate monthly emissions (where no emission factor is given the CEM data is used):
Emission Factors

<table>
<thead>
<tr>
<th></th>
<th>ROC</th>
<th>NOx</th>
<th>PM</th>
<th>SOx</th>
<th>CO</th>
<th>Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>LM 2500-33 Turbine</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Natural Gas:</td>
<td>14.15</td>
<td>CEM</td>
<td>6.10</td>
<td>0.60</td>
<td>52.83</td>
<td>lbs/MMcf</td>
</tr>
<tr>
<td>Fuel Oil:</td>
<td>1.84</td>
<td>CEM</td>
<td>3.10</td>
<td>24.41</td>
<td>4.45</td>
<td>lbs/Mgal</td>
</tr>
<tr>
<td>B &amp; W Boilers:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Natural Gas:</td>
<td>13.45</td>
<td>50.94</td>
<td>7.60</td>
<td>0.60</td>
<td>310.00</td>
<td>lbs/MMcf</td>
</tr>
<tr>
<td>Fuel Oil:</td>
<td>1.60</td>
<td>20.74</td>
<td>2.00</td>
<td>24.41</td>
<td>43.92</td>
<td>lbs/Mgal</td>
</tr>
</tbody>
</table>

The emission factors may be changed at the discretion of the VCAPCD. If the factors are revised, the annual emission limits listed above will be changed accordingly. Combined monthly emissions for the turbine and the boilers shall be summed for the previous twelve months. Emission totals for any of these 12-month periods in excess of the specified limits shall be considered a violation of this condition.

The NOx emission limit of 33.38 tons per year is the initial offset provided for Authority to Construct No. 1267-2, dated January 30, 1986. This offset amount is comprised of 14.03 tons NOx per year provided by the non-operation of the former boilers at the California State University facility (former VCAPCD Permit to Operate No. 00238) and 19.35 tons NOx per year which were granted to the stationary source as Utility Displacement Credits pursuant to California Health and Safety Code Section 41605.

The ROC, PM, SOx, and CO annual emission limits are based on the emission factors listed above and the annual fuel throughputs listed below.

Annual Fuel Throughputs

<p>| | | | | | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>LM 2500-33 Turbine:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2,089.4 MMcf natural gas (8497 Hours) for ROC and CO</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1,823.8 MMcf natural gas (7417 Hours) &amp; 2,004 Mgal fuel oil (1080 Hours) for PM and SOx</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>B &amp; W Boilers:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>15.5 MMcf natural gas (263 Hours)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

This emission limit basis was established with Permit to Operate Application No. 1267-121. (Rule 26)

2. The Babcock and Wilcox steam boilers shall be fired on natural gas. Distillate fuel oil shall only be burned in the Babcock and Wilcox steam boilers during periods of natural gas supply curtailment, periodic fuel distribution system testing, or source testing. (Rule 26)

3. When burning distillate fuel oil in the Babcock and Wilcox steam boilers, the following conditions shall be met:
a. The stack outlet concentration of nitrogen oxides (NOx expressed as NO2) and carbon monoxide (CO) shall not exceed 115 ppmvd and 400 ppmvd, respectively, corrected to 3% oxygen, averaged over 15 minutes. The monitoring, recordkeeping, reporting, and test method requirements for these boilers are included in Attachment 74.15N1 in Section No. 6 of this permit. A source test for NOx and CO while burning distillate fuel oil shall be performed upon District request. (Rule 26 and Rule 74.15)

b. The fuel oil shall have the lowest sulfur content available, and shall not exceed 0.17% by weight. (Rule 26)

This condition is applied as BACT, per Authority to Construct No. 1267-3.

4. The Babcock and Wilcox steam boilers shall be equipped with a means to continuously monitor and record the fuel consumption in each boiler. Such systems shall be accurate to within plus or minus 1 percent, as certified by the manufacturer in writing. (Rule 26)

5. The permittee shall install, operate, and maintain continuous in-stack emissions monitors and recorders to measure and record the amount of excess oxygen in the Babcock and Wilcox steam boiler exhaust stacks. These monitoring systems shall be installed, operated, calibrated, and maintained pursuant to manufacturer’s specifications. (Rule 26 and Rule 74.15)

6. The Babcock and Wilcox steam boilers are to be used for standby service only, and shall be fired to meet the thermal requirements of the California State University facility when the gas turbine is not in operation. Therefore, the steam boilers shall not be operated simultaneously with the gas turbine. This condition shall not apply for a period not to exceed 60 minutes during which a transition is being made between operation of the gas turbine and the steam boilers. (Rule 26)

7. The GE LM-2500-33 gas turbine shall be fired on natural gas. Distillate fuel oil combustion in the gas turbine shall be limited to the following conditions:

a. Fuel oil shall only be burned during periods of natural gas supply curtailment, periodic fuel distribution system testing, or source testing. (Rule 26)

b. Fuel oil use shall be limited to 1,080 hours (45 days) in any 12 month period. (Rule 26)

c. Within five calendar days of each natural gas curtailment period in which fuel oil is burned, the permittee shall provide the District Compliance Division with documentation of efforts to obtain the lowest sulfur content of fuel oil. (Rule 26)
8. The permittee shall maintain the following records:

a. Monthly records of the amount of natural gas and distillate fuel oil consumed by the Babcock and Wilcox steam boilers and the reason for firing distillate fuel oil rather than natural gas. (Rule 26)

b. Monthly records of the amount of natural gas, fuel oil, and ammonia consumed by the gas turbine; and the reason for firing distillate fuel oil rather than natural gas. (Rule 26)

c. Combined monthly and twelve-month rolling records of ROC, NOX, PM, SOX, and CO emissions (in tons) for the GE LM 2500-33 gas turbine and the Babcock and Wilcox steam boilers. The NOX emissions for the LM 2500-33 gas turbine shall be measured by the continuous emission monitoring system. All other annual emission rates shall be calculated by using the monthly fuel records and the emission factors listed in Permit Condition No. 1 above. (Rule 26)

d. For each distillate fuel oil delivery, the permittee shall record the date and amount delivered, and shall either obtain the fuel supplier's certification, or test the sulfur content of the fuel using ASTM Method D4294-98 or D2622-98. Also, a summary of the efforts taken to obtain the lowest sulfur content distillate fuel shall be maintained at the facility. The fuel sulfur content by weight data shall be maintained at the facility and shall be provided with the annual compliance certification. (Rule 26)

These records shall be maintained at the facility and submitted to the District upon request. (Rule 26)

9. The permittee shall notify the District Compliance Division in writing by the 31st day of each December of the date(s) planned for scheduled shutdowns for the next calendar year. (Rule 29)
8. GENERAL APPLICABLE REQUIREMENTS (ATTACHMENTS)

The general applicable requirements are broadly applicable requirements that apply and are enforced in the same manner for all subject emissions units or activities. These requirements can normally be adequately addressed in the permit application with minimal or no reference to any specific emissions unit or activity, provided that the scope of the requirement and the manner of its enforcement are clear. Examples of such requirements include those that apply identically to all emissions units at a facility (e.g., source-wide opacity limits), general housekeeping requirements, and requirements that apply identical emissions limits to small units (e.g., process weight requirements).

As detailed in the Title V Permit Reissuance Application, general applicable requirements that apply to this facility were determined. The permit conditions associated with each generally applicable requirement are listed in an individual attachment. The attachment is identified with the label “Attachment (APCD Rule No.) ___” in the lower left corner of each attachment. Each attachment has an applicability section that describes the emissions units to which the attachment applies. Each attachment may apply to one or more of the emissions units listed in the Applicable Requirements Table of Section No. 2. Note that these general applicable requirements may also apply to emissions units not required to be listed in the permit, such as those that are short-term.
Ventura County Air Pollution Control District
Rule 50 Applicable Requirements
Opacity

Rule 50, "Opacity"
Adopted 04/13/04, Federally-Enforceable

Applicability:

This attachment applies to all emissions units at this stationary source.

Conditions:

1. Pursuant to Rule 50.A, permittee shall not discharge into the atmosphere from any single source whatsoever any air contaminants for a period or periods aggregating more than three (3) minutes in any one (1) hour which are as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, or equivalent to 20% opacity and greater, unless specifically exempted by Rule 50.

2. Permittee shall perform routine surveillance and visual inspections to ensure that compliance with Rule 50 is being maintained. A record shall be kept of any occurrence of visible emissions other than uncombined water greater than zero percent for a period or periods aggregating more than three (3) minutes in any one (1) hour. These records shall include the date, time, and identity of emissions unit. If the visible emissions problem cannot be corrected within 24 hours, permittee shall provide verbal notification to the District within the subsequent 24 hours. These visible emissions records shall be maintained at the facility and submitted to the District upon request.

3. On an annual basis, permittee shall certify that all emissions units at the facility are complying with Rule 50. This annual compliance certification shall include a formal survey identifying the date, time, emissions unit, and verification that there are no visible emissions other than uncombined water greater than zero percent for a period or periods aggregating more than three (3) minutes in any one (1) hour. As an alternative, the annual compliance certification shall include a formal survey identifying the date, time, emissions unit, and verification that there are no visible emissions for a period or periods aggregating more than three (3) minutes in any one (1) hour which are as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, or equivalent to 20% opacity and greater, as determined by a person certified in reading smoke using EPA Method 9, or any other appropriate test method as approved in writing by the District, the California Air Resources Board, and the U.S. Environmental Protection Agency.
4. Upon District request, opacity shall be determined during routine surveillance and during the annual compliance certification by a person certified in reading smoke using EPA Method 9 or a certified, calibrated monitoring system.
Ventura County Air Pollution Control District
Rule 54 Applicable Requirements
Sulfur Compounds - Sulfur Emissions from
Combustion Operations at Point of Discharge

Rule 54, "Sulfur Compounds"
Federally Enforceable Version Adopted 06/14/94
District Enforceable Version Adopted 01/14/14

This permit attachment lists the requirements of the January 14, 2014 version of the rule. Compliance with this attachment will ensure compliance with both versions of Rule 54. The permit conditions below, therefore, are federally enforceable. The District-enforceable version of this rule will become federally enforceable when approved by the EPA as part of the SIP.

Rule 64, "Sulfur Content of Fuels"
Adopted 04/13/99, Federally-Enforceable

Applicability:

This attachment applies to all combustion emissions units at this stationary source that combust gaseous or liquid fuels. This attachment addresses the requirements of Rule 54 for sulfur emissions at the point of discharge. It can be demonstrated that compliance with the fuel sulfur content limits of Rule 64 ensures compliance with the sulfur emission limits of Rule 54.

Conditions:

1. Pursuant to Rule 54.B.1.a, no person shall discharge sulfur compounds from any combustion operation, which would exist as a liquid or gas at standard conditions, in excess of the following limit at the point of discharge:

<table>
<thead>
<tr>
<th>300 ppm by vol, on a dry basis, as sulfur dioxide (SO_2), at 3% oxygen</th>
<th>For sources subject to:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Rule 74.11, “Natural Gas-Fired Water Heaters”</td>
</tr>
<tr>
<td></td>
<td>Rule 74.11.1, “Large Water Heaters and Small Boilers”</td>
</tr>
<tr>
<td></td>
<td>Rule 74.15, “Boilers, Steam Generators, and Process Heaters”</td>
</tr>
<tr>
<td></td>
<td>Rule 74.15.1, “Boilers, Steam Generators, and Process Heaters” (1 to 5 MMBTU)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>300 ppm by vol, on a dry basis, as sulfur dioxide (SO_2), at 15% oxygen</th>
<th>For sources subject to:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Rule 74.9, “Stationary Internal Combustion Engines”</td>
</tr>
<tr>
<td></td>
<td>Rule 74.23, “Stationary Gas Turbines”</td>
</tr>
<tr>
<td></td>
<td>Flares and all other combustion operations</td>
</tr>
</tbody>
</table>
2. In order to comply with Rule 54, permittee shall comply with the fuel sulfur content limits of Rule 64. No additional periodic monitoring requirements for Rule 54 are required beyond the periodic monitoring requirements of Rule 64.

3. Upon District request, sulfur compounds at the point of discharge shall be determined by source testing using EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or South Coast AQMD Test Method 307-91 (Determination of Sulfur in a Gaseous Matrix), as appropriate.
Ventura County Air Pollution Control District
Rule 54 Applicable Requirements
Sulfur Compounds - Sulfur Dioxide Concentration at Ground Level

Rule 54, "Sulfur Compounds"
Federally Enforceable Version Adopted 06/14/94
District Enforceable Version Adopted 01/14/14

This permit attachment lists the requirements of the January 14, 2014 version of the rule. Compliance with this attachment will ensure compliance with both versions of Rule 54. The permit conditions below, therefore, are federally enforceable. The District-enforceable version of this rule will become federally enforceable when approved by the EPA as part of the SIP.

Applicability:

This attachment applies to all emissions units at this stationary source that emit sulfur compounds. This attachment addresses the requirements of Rule 54 for sulfur emissions at ground or sea level at or beyond the property line of the stationary source.

Conditions:

1. Pursuant to Rule 54, no person shall discharge sulfur compounds, which would exist as a liquid or gas at standard conditions, as sulfur dioxide which results in average ground or sea level concentrations at any point at or beyond the property line in excess of 0.25 ppmv averaged over any one hour period, or 0.04 ppmv averaged over any 24 hour period.

2. Pursuant to Rule 54.B.2.a, no person shall discharge sulfur compounds, which would exist as a liquid or gas at standard conditions, as sulfur dioxide which results in ground or sea level concentrations at any point at or beyond the property line such that the 1-hour average design value exceeds 0.075 ppm (Vol).

   a) For purposes of Subsection B.2.a, the design value is derived from the 3-year average of annual 99th percentile daily maximum 1-hour values. At the District's discretion, compliance with the ground or sea level concentration limit in Subsection B.2.a of this rule may be demonstrated using EPA-approved dispersion models or ambient air monitoring. If the District requires ambient air monitoring, the test method(s) listed in Subsection D.2 of this rule must be employed.

   b) To demonstrate compliance using dispersion modeling, the annual 99th percentile daily maximum at each receptor is determined from model results as follows: for each year of meteorological data modeled, select from each day the maximum hourly modeled SO₂ concentration value and sort all these daily maximum hourly values by descending value. The 99th percentile is the 4th highest value for each modeled year. Calculate the average of the 99th percentile values for three
consecutive years of modeling data for each receptor. Compliance is demonstrated if this average value is less than or equal to the design value concentration limit in Subsection B.2.a of this Rule at each receptor.

c) Compliance with the limit in subsection B.2.a may also be demonstrated using EPA-approved screen models. Compliance is demonstrated if the 1-hour SO₂ ground or sea level concentration does not exceed 0.075 ppm (Vol) at or beyond the property line.

d) If ambient air monitoring data is used to demonstrate compliance, the design value must be calculated in accordance with 40 CFR Part 50 Appendix T – Interpretation of the Primary National Ambient Air Quality Standards for Oxides of Sulfur (Sulfur Dioxide).

3. Permittee shall maintain a representative fuel analysis or exhaust analysis, along with modeling data or other demonstration to ensure that compliance with Rule 54 is being maintained. This analysis and compliance demonstration shall be provided to the District upon request.

4. Upon District request, ground or sea level concentrations of SO₂ shall be determined by Bay Area Air Quality Management District Manual of Procedures, Volume VI, Section 1, Ground Level Monitoring for Hydrogen Sulfide and Sulfur Dioxide (July 20, 1994) with the following amendments:

a. The wind direction shall be continuously measured and recorded to within 5 degrees of arc, and wind speed shall be continuously measured and recorded to within 0.25 miles per hour (mph) at wind speeds less than 25 mph and with a threshold no greater than 0.2 mph.


c. The gas standards shall be restandardized against the reference wet chemical method at a minimum of once every 12 months, or be standardized using National Institute of Standards and Technology (NIST) standard gases.
Rule 55, "Fugitive Dust"
Adopted 06/10/08, District-Enforceable

This permit attachment will become federally enforceable when Rule 55 is approved by EPA as part of the SIP.

Applicability:

This attachment applies to any operation, disturbed surface area, or man-made condition at this stationary source that is capable of generating dust. These operations may include bulk material handling, earth-moving, construction, demolition, storage piles, unpaved roads, track-out, or off-field agricultural operations.

All definitions listed in Section H of Rule 55 are applicable to this attachment. The Rule 55 definition section includes the following definitions: “disturbed surface area”, “bulk material”, “earth moving activities”, “construction/demolition activities”, “storage piles”, “paved road”, “track-out”, and “off-field agricultural operations”. All exemptions listed in Section D of Rule 55 are applicable to this attachment.

Conditions:

1. Pursuant to Rule 55.B.1, the permittee shall not cause or allow the emissions of fugitive dust from any applicable source such that the dust remains visible beyond the midpoint (width) of a public street or road adjacent to the property line of the emission source or beyond 50 feet from the property line if there is not an adjacent public street or road.

2. Pursuant to Rule 55.B.2, the Permittee shall not cause or allow the emissions of fugitive dust from any applicable source such that the dust causes 20 percent opacity or greater during each observation and the total duration of such observations (not necessarily consecutive) is a cumulative 3 minutes or more in any one (1) hour. Only opacity readings from a single source shall be included in the cumulative total used to determine compliance. Compliance with the opacity limit shall be determined by using EPA Method 9 with the modifications listed in Section F of Rule 55.

3. Pursuant to Rule 55.B.3, the permittee shall not allow track-out to extend 25 feet or more in length unless at least one of the following three control measures is utilized: track-out area improvement, track-out prevention, or track-out removal. These control measures are detailed in Rule 55.B.3.a.
4. Pursuant to Rule 55.B.3.b, notwithstanding other track-out requirements, all track-out shall be removed at the conclusion of each workday or evening shift subject to the conditions listed in Section 55.B.3.b.

5. Pursuant to Rule 55.C, the permittee shall comply with the specific activity requirements detailed in Section C of Rule 55, for earth-moving, bulk material handling, and truck hauling activities, as applicable.

6. The permittee shall comply with the specific recordkeeping requirements listed in Section E of Rule 55, as applicable.

7. On an annual basis, the permittee shall certify that all applicable sources of dust at this stationary source are operating in compliance with Rule 55. The permittee may also certify annually that there are no operations, disturbed surface areas, or man-made conditions at this stationary source that are subject to Rule 55.
Ventura County Air Pollution Control District
Rule 57.1 Applicable Requirements
Particulate Matter Emissions From Fuel Burning Equipment

Rule 57.1, "Particulate Matter Emissions From Fuel Burning Equipment"
Adopted 01/11/05, Federally-Enforceable

Applicability:
This attachment applies to fuel burning equipment such as boilers, steam generators, process heaters, water heaters, space heaters, flares, and gas turbines. This attachment does not apply to internal combustion engines, jet engine test stands and rocket engine test stands, and rocket propellant testing devices and rocket fuel testing devices. This attachment also does not apply to exhaust gas streams containing particulate matter that was not generated by the combustion of fuel; such exhaust gas streams are subject to Rule 52 and Rule 53.

Conditions:

1. Pursuant to Section B of Rule 57.1, emissions of particulate matter shall not exceed 0.12 pounds per million BTU of fuel input.

   Particulate matter is defined as any material, except uncombined water, that exists in a finely divided form as a liquid or solid at standard conditions. Standard conditions are: a gas temperature of 68 degrees Fahrenheit (20 degrees Celsius) and a gas pressure of 14.7 pounds per square inch (760 mm. Hg) absolute.

2. Upon request of the District Compliance Division, compliance shall be determined by independent source test using CARB Method 5. The total particulate catch shall include the filter catch, probe catch, impinger catch, and the solvent extract, as specified in CARB Method 5. Any other appropriate test method may be used with prior written approval by the District, the California Air Resources Board, and the U.S. Environmental Protection Agency.

3. Periodic monitoring is not necessary to certify compliance with Rule 57.1. To certify compliance, a reference to the Rule 57.B District analysis dated December 3, 1997 is sufficient.
Rule 64, "Sulfur Content of Fuels"
Adopted 04/13/99, Federally-Enforceable

Applicability:

This attachment applies to all combustion emissions units at this stationary source while the emissions units are combusting gaseous fuels. Rule 64 shall not apply to any flare gas combustion, where no useful energy is produced and which is subject to Rule 54, “Sulfur Compounds”.

Conditions:

1. Pursuant to Rule 64, no person shall burn at any time gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel (788 ppmv), calculated as hydrogen sulfide at standard conditions, unless specifically exempted by Rule 64.

2. If only Public Utilities Commission-regulated natural gas, propane, or butane is combusted at this facility, it will be assumed that the permittee is complying with Rule 64 without additional periodic monitoring requirements. Any person claiming this exemption shall maintain records sufficient to substantiate the use of these fuels.

3. If other than Public Utilities Commission-regulated natural gas, propane, or butane is being combusted, the permittee shall analyze the sulfur content of the fuel on an annual basis using South Coast AQMD Method 307-94 - Determination of Sulfur in a Gaseous Matrix or by ASTM D1072-90 (1994), Standard Test Method for Total Sulfur in Fuel Gases.

Alternatively, when measuring the sulfur content of landfill or oilfield gaseous fuel, permittee may use the colorimetric method ASTM D 4810-88 (Reapproved 1994) or the ASTM D4084-94 (Lead Acetate Reaction Rate Method) and may assume that the hydrogen sulfide content of the fuel gas adequately represents the total sulfur content. However, if the sulfur content as measured by ASTM D4810-88 or ASTM D4084-94 equals or exceeds 200 ppmv, then only South Coast AQMD Method 307-94 or ASTM D1072-90 (1994) shall be used to determine compliance.

The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis may be used subject to the verification of the dilution ratio.
Permittee may use the colorimetric method ASTM D 4810-88 (Reapproved 1994) for the measurement of the sulfur content of gaseous fuels other than landfill or oilfield gas only if written approval has been granted by the District and by US EPA.

4. Monitoring of the sulfur content of landfill or oilfield gaseous fuel by the permittee shall be at least quarterly if any of the following conditions apply:

a. Any sulfur measurement exceeds 394 ppmv, calculated as hydrogen sulfide at standard conditions.

b. A stationary source is new.

c. The permittee has not reported historical measurements of hydrogen sulfide of the landfill or oilfield gaseous fuel performed within the previous three years in writing to the District for a stationary source.

An operator may have the sulfur content of landfill or oilfield gaseous fuel monitored annually only, instead of quarterly, by satisfying the following provisions:

a. During four consecutive calendar quarters, each sulfur content measurement shall not exceed 394 ppmv, calculated as hydrogen sulfide at standard conditions, and

b. Submit a written request to the District for a reduction in monitoring frequency. This request shall contain backup documentation including monitoring reports that document the above provision. Requests for a reduction in monitoring frequency are not effective until written approval by the District is received by the operator.

This annual fuel analysis, and the quarterly analyses if applicable, shall be maintained at the facility and a copy of the annual analysis shall be provided to the District with the annual compliance certification.
Rule 64, "Sulfur Content of Fuels"
Adopted 04/13/99, Federally-Enforceable

Applicability:

This attachment applies to all combustion emissions units at this stationary source while the emissions units are combusting liquid fuels. This attachment does not apply to any combustion emission unit with sulfur emission controls.

Conditions:

1. Pursuant to Rule 64, no person shall burn any liquid fuels with a sulfur content in excess of 0.5 percent, by weight, unless specifically exempted by Rule 64.

2. If only ARB-quality reformulated gasoline or ARB-certified diesel fuel is combusted at this facility, it will be assumed that the permittee is complying with Rule 64 without additional periodic monitoring requirements. Any person claiming this exemption shall maintain records sufficient to substantiate the use of these fuels.

3. If other than ARB-quality reformulated gasoline or ARB-certified diesel fuel is being combusted, for each liquid fuel delivery permittee shall either obtain the fuel supplier’s certification, or shall test the sulfur content of the fuel using ASTM Method D4294-98 or D2622-98, to ensure that compliance with Rule 64 is being maintained. For liquid fuels, operators of electric power generation units may use the sampling and analysis methods prescribed in Code of Federal Regulations 40CFR Part 75 Appendix D.2.2. The fuel supplier’s certification may be provided once for each purchase lot, if records are kept of the purchase lot number of each delivery.

The fuel sulfur content by weight data shall be maintained at the facility and shall be provided with the annual compliance certification.
Rule 74.6, "Surface Cleaning and Degreasing"
Adopted 11/11/03, Federally-Enforceable

Applicability:

This attachment applies to all solvent cleaning activities at this stationary source, except those activities listed in Condition No. 11 that are exempt pursuant to Section E of Rule 74.6. This attachment does not apply to substrate surface preparation regulated by other APCD surface coating, adhesive, ink, resin, and solvent rules. “Solvent” is defined as any ROC-containing liquid used to perform solvent cleaning. “Solvent cleaning” is defined as the use of organic solvent to remove loosely held uncured adhesives, uncured inks, uncured coatings, uncured resins, and other contaminants which include, but are not limited to, dirt, soil, lubricants, coolant, moisture, grease, and fingerprints, from parts, tools, machinery, equipment, and general work areas.

This attachment also contains requirements, pursuant to Rule 74.6, for cold cleaners. A cold cleaner is defined in Rule 74.6 as any batch operated equipment designed to contain liquid solvent that is operated below the solvent’s boiling point to carry out solvent cleaning operations. A specific type of cold cleaner is a “remote reservoir cold cleaner” which is a device in which solvent is moved through a sink-like work area for cleaning parts and drains immediately, without forming a pool, through a single drain hole less than 100 square centimeters (15.5 square inches) in area into an enclosed container that is not accessible for soaking parts. The freeboard height for remote reservoir cold cleaners is the distance from the top of the solvent drain to the top of the tank.

This attachment does not apply to solvent cleaning where an emission control system is used pursuant to Rule 74.6.B.5 or where an alternative cleaning system is used pursuant to Rule 74.6.B.6. Pursuant to APCD Rule 23.F.7, solvents used by the permittee for facility, ground, and building maintenance and repair are exempt from the requirement to have a permit. However, unless exempted by Rule 74.6.E, such solvents are required to comply with Rule 74.6.

Conditions:

1. Pursuant to Rule 74.6.B.1, no person shall perform solvent cleaning using solvent that exceeds the following limits:

   a. Solvents used for application equipment cleanup, and all other cleanup of uncured coatings, adhesives, inks, or resins, shall not exceed an ROC content of 900 grams per liter and an ROC composite partial pressure of 33 mmHg at 20°C, as applied.
b. Solvents used for cleaning of electronic components, electrical apparatus components, medical devices, or aerospace components shall not exceed an ROC content of 900 grams per liter and an ROC composite partial pressure of 33 mmHg at 20° C, as applied.

c. Solvents used for cleaning for purposes other than those listed in (a) and (b) above shall not exceed an ROC content of 25 grams per liter, as applied.

2. Pursuant to Rule 74.6.B.2, no person shall perform solvent cleaning using a solvent with an ROC content greater than 25 grams per liter unless one of the following cleaning devices or methods is used:

a. Wipe cleaning where solvent is dispensed to wipe cleaning materials from containers that are kept closed to prevent evaporation, except while dispensing solvent or replenishing the solvent supply;

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

   If the cleaning method has a solvent capacity more than one gallon, a cold cleaner or remote reservoir cold cleaner meeting the equipment and operating requirements of Condition Nos. 8, 9, and 10 of this attachment (Sections C and D of Rule 74.6) shall be used to comply with this requirement.

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

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

3. Pursuant to Rule 74.6.B.3.a, no person shall allow liquid cleaning solvent to leak from any equipment or container.

4. Pursuant to Rule 74.6.B.3.b, no person shall specify, solicit, supply, or require any cleaning solvent or solvent cleaning equipment intended for uses governed by Rule 74.6 if such use would violate Rule 74.6. This prohibition applies to all written and oral contracts under which solvent cleaning operations subject to Rule 74.6 are to be conducted at any location in Ventura County.

5. Pursuant to Rule 74.6.B.3.c, no person shall use more than one gallon per week of
solvents containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, or chloroform, or any combination of these solvents, in a total concentration greater than 5 percent by weight, for cold cleaning except in a cold cleaner operated in accordance with National Emission Standards for Halogenated Solvent Cleaning, 40 CFR Parts 9 and 63, Subpart T, Sections 63.460 through 63.469 (Degreasing MACT Standards). Any person that uses the above solvent in quantities less than one gallon per week shall maintain records of the volume and formulation of such solvent on an as-used basis (recording use each day such material is used). Records shall be saved for at least five (5) years from the date of each record and shall be made available to District personnel upon request.

6. Pursuant to Rule 74.6.B.4.a, all ROC-containing solvents shall be stored in non-absorbent, non-leaking containers that shall be kept closed at all times except when filling or emptying.

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

8. Pursuant to Rule 74.6.C.1, all cold cleaners, except remote reservoir cold cleaners, shall be equipped with the following devices:

a. A drying rack suspended above the solvent, or other facility for draining cleaned parts such that the drained solvent is returned to the cleaner.

b. A cover that prevents the solvent from evaporating when not processing work in the cleaner. If high volatility solvent is used, the cover must be a sliding, rolling, or guillotine (bi-parting) type that is designed to easily open and close, or it must be designed to be easily operated with one hand. A high volatility solvent is an unheated solvent with an ROC composite partial pressure of greater than 2 mmHg @ 20°C.

c. A freeboard height of at least 6 inches (15.2 centimeters), if low volatility solvent is used. A low volatility solvent is an unheated solvent with an ROC composite partial pressure of 2 mmHg or less @ 20°C.

d. At least one of the following control devices, if high volatility solvent is used:

1. A freeboard height such that the freeboard ratio is at least 0.75.
2. A water cover if the solvent is insoluble in and heavier than water.

e. A permanent conspicuous mark locating the maximum allowable solvent level that conforms with the applicable freeboard height requirement in Condition No. 8.c or 8.d.1.
f. A permanent conspicuous label or sign summarizing the applicable operating requirements appropriate for cold cleaning operations.

9. Pursuant to Rule 74.6.C.2, remote reservoir cold cleaners shall be equipped with the following devices:
   a. A permanent conspicuous label or sign summarizing the applicable operating requirements appropriate for cold cleaning operations.
   b. A sink-like work area that is sloped sufficiently towards the drain to preclude pooling of solvent.
   c. A single drain hole, less than 100 square centimeters (15.5 square inches) in area, for the solvent to flow from the sink into the enclosed reservoir.
   d. A freeboard height of at least 6 inches (15.2 centimeters).
   e. A cover for the drain when no work is being processed in the cleaner and high volatility solvent is used. If low volatility solvent is used, a cover is not required.

10. Pursuant to Rule 74.6.D, any person who operates a cold cleaner shall conform to the following operating requirements:
   a. The operator shall drain cleaned parts of all solvent until dripping ceases to ensure that the drained solvent is returned to the cleaner.
   b. Solvent agitation, where necessary, shall be achieved using pump recirculation, a mixer, or ultrasonics. Air agitation shall not be used.
   c. If a solvent flow is utilized, only a solid fluid stream (not a fine, atomized, or shower type spray) shall be used.
   d. The pressure of the solvent flow system shall be such that liquid solvent does not splash outside the container.
   e. No person shall remove or open any required device designed to cover the solvent unless work is being processed in the cleaner or maintenance is being performed on the cleaner.
   f. The cleaning equipment and emission control equipment shall be operated and maintained in proper working order.
   g. The cleaning of porous or absorbent materials such as cloth, leather, wood, or rope is prohibited. This provision shall not apply to paper gaskets or paper filters.

11. Pursuant to Rule 74.6.E.1, Rule 74.6 (all requirements of this permit attachment) shall not
apply to:

a. Cleaning activities using Clean Air Solvent, or a solvent with an ROC-content no more than 25 grams per liter as applied. A “Clean Air Solvent” is a solvent certified by the South Coast Air Quality Management District as a Clean Air Solvent.

b. The use of up to 160 fluid ounces of non-refillable aerosol cleaning products per day, per facility.

c. Janitorial cleaning including graffiti removal.

d. Cleaning carried out in vapor degreasers or motion picture film cleaning equipment.

e. Any cleaning device or mechanism regulated by National Emission Standards for Halogenated Solvent Cleaning, 40 CFR Parts 9 and 63, Subpart T, Sections 63.460 through 63.469 (Degreasing MACT Standards).

f. Cleaning operations subject to any of the following rules:

   Rule 74.3, Paper, Fabric and Film Coating Operations  
   Rule 74.5.1, Petroleum Solvent Dry Cleaning  
   Rule 74.5.2, Synthetic Solvent Dry Cleaning  
   Rule 74.19, Graphic Arts Operations  
   Rule 74.19.1, Screen Printing Operations  
   Rule 74.21, Semiconductor Manufacturing

   g. Stripping of cured coating (e.g.; stripping), cured adhesive (e.g.; debonding, unglueing), cured ink, or cured resin.

   h. The use of solvent for purposes other than solvent cleaning activities.

12. Pursuant to Rule 74.6.E.2, Rule 74.6.B.1 (Condition No. 1 of this attachment) shall not apply to:

   a. Cleaning operations required to comply with any ROC content and/or composite vapor pressure limit in any of the following rules:

   Rule 74.12, Surface Coating of Metal Parts and Products  
   Rule 74.13, Aerospace Assembly and Component Manufacturing Operations  
   Rule 74.14, Polyester Resin Material Operations  
   Rule 74.18, Motor Vehicle and Mobile Equipment Coating Operations  
   Rule 74.20, Adhesives and Sealants  
   Rule 74.24, Marine Coating Operations
Rule 74.24.1, Pleasure Craft Coating Operations  
Rule 74.30, Wood Products Coatings

b. Cleaning of ultraviolet lamps used to cure ultraviolet inks coatings, adhesives or resins.

c. Cleaning of solar cells, laser hardware, scientific instruments, or high-precision optics.

d. Cleaning conducted in laboratory tests and analyses including quality assurance/quality control applications, or bench scale or short-term (less than 2 years) research and development programs.

e. Removal of elemental sodium from the inside of pipes and lines.

f. Cleaning of mold release compounds from molds.

g. Cleaning of tools used to cut or abrade cured magnetic oxide coatings.

h. Cleaning of aerospace assembly and subassembly surfaces that are exposed to strong oxidizers or reducers such as nitrogen tetroxide, liquid oxygen or hydrazine.

i. Cleaning of paper gaskets.

j. Cleaning of clutch assemblies where rubber is bonded to metal by means of an adhesive.

k. Cleaning of hydraulic actuating fluid from filters and filter housings.

l. Removal of explosive materials and constituents from equipment associated with manufacturing, testing or developing explosives.

m. Manufacturing cleaning of nuts and bolts designed for automotive racing applications, in a cold cleaner complying with Sections C and D of Rule 74.6 using solvent with an ROC content no more than 900 grams per liter and a ROC composite partial pressure no more than 5 mm Hg @ 20C.

n. Cleaning of precision-lapped mechanical seals in pumps that handle liquefied gasses, in a cold cleaner complying with Sections C and D of Rule 74.6 using solvent with an ROC content no more than 900 grams per liter and a ROC composite partial pressure no more than 5 mm Hg @ 20C.

o. Facilitywide use of less than 1 gallon per week of non-compliant solvent where compliant solvents are not available. Any person claiming this exemption shall
maintain records of the volume and formulation of non-compliant solvent used on an as-used basis (recording use each day such material is used). Records shall be saved for at least five (5) years from the date of each record and shall be made available to District personnel upon request.

13. Pursuant to Rule 74.6.E.3, Rule 74.6 Sections B.1 and B.2 (Condition Nos. 1 and 2 of this attachment) shall not apply to aircraft engine gas path cleaning or stationary gas turbine gas path cleaning using solvent with an ROC content of 200 g/l or less, as applied.

14. Pursuant to Rule 74.6.F, the permittee shall maintain a current material list showing each ROC containing material used in solvent cleaning activities. The list shall summarize the following information:

a. Solvent name and manufacturer's description.

b. All intended uses of the solvent at the facility, classified as follows:
   1. Cleanup, including application equipment cleaning, or
   2. Cleaning of electronic components, electrical apparatus components, medical devices, or aerospace components, or
   3. Solvent used pursuant to an exemption in Rule 74.6.E (specify the exemption claimed).

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

d. If the solvent is a mix of materials blended by the operator, a record of the mix ratio.

This information shall be made available to District personnel upon request.

15. Permittee shall maintain the above records and perform routine surveillance of the applicable solvent cleaning activities to ensure that compliance with Rule 74.6 is being maintained. Upon request of the District, compliance with Rule 74.6 shall be determined using the following methods:

a. Pursuant to Rule 74.6.G.1, the ROC content of materials shall be determined by EPA Test Method 24 (40 CFR Part 60, Appendix A).

b. Pursuant to Rule 74.6.G.4, the identity of components in solvents shall be determined using manufacturer's formulation data or by using ASTM E168-67, ASTM E169-87, or ASTM E260-85.

d. Pursuant to Rule 74.6.G.6, the active and passive solvent losses from spray gun cleaning systems shall be determined using South Coast Air Quality Management District's "General Test Method for Determining Solvent Losses from Spray Gun Cleaning Systems" dated October 3, 1989. The test solvent for this determination shall be any lacquer thinner with a minimum vapor pressure of 105 mm Hg at 20°C. The minimum test temperature shall be 15°C.

e. Pursuant to Rule 74.6.G.7, initial boiling point of solvent shall be determined by ASTM 1078-78 or by using a published source such as listed in Rule 74.6.G.5.
Ventura County Air Pollution Control District
Rule 74.11.1 Applicable Requirements
Rule 74.11.1, Large Water Heaters and Small Boilers

Rule 74.11.1, "Large Water Heaters and Small Boilers"
Adopted 09/14/99, Federally Enforceable

Applicability:
This attachment applies to all natural gas-fired water heaters, boilers, steam generators or process heaters (units) with a rated heat input capacity greater than or equal to 75,000 BTU/hr and less than 1,000,000 BTU/hr at this stationary source installed after January 1, 2013 and to the future installation of any such unit at this stationary source. Note that units rated less than 1,000,000 BTU/hr are exempt from District permit requirements pursuant to Rule 23.C.1.

Conditions:

1. Pursuant to Rule 74.11.1.B.2, no person shall sell, offer for sale, or install in Ventura County any new unit with a rated heat input capacity of greater than or equal to 75,000 BTU/hr and less than or equal to 400,000 BTU/hr that does not meet the following criteria:

   a. Oxides of nitrogen emissions shall not exceed 14 nanograms per joule of heat output (32.5 pounds per billion BTU), or 20 parts per million, and

   b. The unit is certified in accordance with Rule 74.11.1.C.

The oxides of nitrogen emission standard required above (Condition No. 1.a) does not apply to units specifically designed to heat swimming pools, hot tubs, or spas. For such units, oxides of nitrogen emissions shall not exceed 40 nanograms per joule of heat output (93 pounds per billion BTU), or 55 parts per million.

2. Pursuant to Rule 74.11.1.B.4, no person shall sell, offer for sale, or install in Ventura County any new unit with a rated heat input capacity of greater than 400,000 BTU/hr and less than or equal to 1,000,000 BTU/hr that does not meet the following criteria:

   a. Oxides of nitrogen emissions shall not exceed 20 parts per million and carbon monoxide emissions shall not exceed 400 parts per million, and

   b. The unit is certified in accordance with Rule 74.11.1.C.

3. The permittee shall maintain a listing of manufacturer, brand name, model number, heat input rating, and installation date for each water heater, boiler, steam generator and
process heater, with a rated heat input capacity greater than or equal to 75,000 BTU/hr and less than 1,000,000 BTU/hr, at this stationary source. Permittee shall submit these identification records for all of these units to the District upon request.

4. On an annual basis, the permittee shall certify that all water heaters, boilers, steam generators and process heaters, with a rated heat input capacity greater than or equal to 75,000 BTU/hr and less than 1,000,000 BTU/hr, at this stationary source are complying with Rule 74.11.1. This annual certification shall include a formal survey identifying each unit and documentation of certification status (pursuant to Rule 74.11.1.C), as required.
Ventura County Air Pollution Control District
Rule 74.22 Applicable Requirements
Rule 74.22, Natural Gas-Fired Fan-Type Central Furnaces

Rule 74.22, "Natural Gas-Fired Fan-Type Central Furnaces"
Adopted 11/09/93, Federally-Enforceable

Applicability:

This attachment applies to all natural gas-fired, fan-type central furnaces at this stationary source installed after May 31, 1994 and to the future installation of any natural gas-fired, fan-type central furnaces at this stationary source. A fan-type central furnace is a self contained space heater providing for circulation of heated air at pressures other than atmospheric through ducts of more than 10 inches in length that has a rated heat input capacity of less than 175,000 BTU per hour and, for combination heating and cooling units, a rated cooling capacity of less than 65,000 BTU per hour. Natural gas-fired, fan-type central furnaces installed in manufactured housing (mobile homes) are exempt from Rule 74.22.

Conditions:

1. Pursuant to Rule 74.22.B, no person shall install, after May 31, 1994, any natural gas-fired fan-type central furnace:
   a. with NOx (oxides of nitrogen) emissions in excess of 40 nanograms per joule of heat output. (74.22.B.1)
   b. unless it is certified and identified in accordance with Section C of Rule 74.22. (74.22.B.2)

2. Permittee shall maintain a listing of manufacturer, brand name, model number, and heat input rating for each natural gas-fired fan-type central furnace at this stationary source. Permittee shall submit these identification records for all of these furnaces to the District upon request.

3. On an annual basis, permittee shall certify that all natural gas-fired fan-type central furnaces at this stationary source are complying with Rule 74.22. This annual certification shall include a formal survey identifying each natural gas-fired fan-type central furnace; whether it was installed before or after May 31, 1994; and for those furnaces installed after May 31, 1994, information indicating that the certification is contained on the furnace nameplate, or that the furnace is included on a District-provided list of certified furnaces.

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9. GENERAL REQUIREMENTS FOR SHORT-TERM ACTIVITIES (ATTACHMENTS)

The general requirements for short-term activities are broadly applicable requirements that apply to temporary activities at the facility (e.g., abrasive blasting, architectural coatings, degassing operations, etc.). These are activities occurring infrequently and for a short duration. Requirements for short-term activities can normally be adequately addressed in the permit application with minimal or no reference to any specific emissions unit, provided that the scope of the requirement and the manner of its enforcement are clear.

As detailed in the Title V Permit Reissuance Application, general applicable requirements for short-term activities that apply to this facility were determined. The permit conditions associated with each requirement for a short-term activity are listed in an individual attachment. The attachment is identified with the label “Attachment (APCD Rule No. ) ____” or “Attachment 40CFR61.M” in the lower left corner of each attachment.
Ventura County Air Pollution Control District
Rule 74.1 Applicable Requirements
Abrasive Blasting

Rule 74.1, "Abrasive Blasting"
Adopted 11/12/91, Federally-Enforceable

Applicability:

This attachment applies to short term activities involving any abrasive blasting operation conducted at this facility. Abrasive blasting is the operation of cleaning or preparing a surface by forcibly propelling a stream of abrasive material against that surface. Abrasive materials subject to Rule 74.1 include, but are not limited to, sand, slag, steel shot, garnet or walnut shells.

Conditions:

1. Pursuant to Rule 74.1.B.1.a, all abrasive blasting operations shall be conducted within a permanent building, except for abrasive blasting operations conducted under one or more of the following conditions as detailed in Rule 74.1.B.1.b:
   a. Steel or iron shot/grit is used exclusively
   b. The item to be blasted exceeds eight feet in any dimension
   c. The surface being blasted is situated at its permanent location or no further away from its permanent location than is necessary to allow the surface to be blasted

2. Pursuant to Rule 74.1.B.1.c, any abrasive blasting that is allowed to be conducted outside of a permanent building, and is not exclusively using steel or iron shot/grit, must use one of the following:
   a. Wet abrasive blasting
   b. Hydroblasting
   c. Vacuum blasting
   d. Dry blasting with California ARB certified abrasives

3. Abrasive blasting for pavement marking shall comply with the requirements of Rule 74.1.B.2.
4. Abrasive blasting of stucco and concrete shall comply with the requirements of Rule 74.1.B.3.

5. Packages or containers for abrasives certified in accordance with Section 92530 of the California Code of Regulations used for permissible outdoor blasting shall comply with the labeling requirements of Rule 74.1.B.4.

6. Abrasive blasting operations shall comply with the visible emission standards of Rule 74.1.C.1 and the nuisance prohibition of Rule 74.1.C.2. The visible emission evaluation of abrasive blasting operations shall be conducted in accordance with Section 92400 of the California Code of Regulations.

7. Permittee shall perform routine surveillance and visual inspections of the abrasive blasting operation to ensure that compliance with Rule 74.1 is being maintained. This routine surveillance shall include assuring that operation and equipment requirements are being met, and that there are no opacity violations.

In addition, for each abrasive blasting operation conducted at the facility, permittee shall maintain records of the following information:

a. Date of operation

b. Type of abrasive blasting media used

c. Identity, size, and location of item blasted

d. Whether operation was conducted inside or outside a permanent building

e. California ARB certifications for abrasives used

These records shall be maintained at the facility and submitted to the District upon request.
Ventura County Air Pollution Control District
Rule 74.2 Applicable Requirements
Architectural Coatings

Rule 74.2, "Architectural Coatings"
Adopted 01/12/10, Federally-Enforceable

Applicability:

This attachment applies to short term activities involving any person who supplies, sells, offers for sale, applies or solicits the application of any architectural coating at this stationary source. An architectural coating is a coating to be applied to stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs. Coatings applied in shop applications or to nonstationary structures, such as airplanes, ships, boats, railcars and automobiles, are not considered to be architectural coatings for the purposes of this rule, nor are adhesives.

This attachment and Rule 74.2 do not apply to architectural coatings that are sold in a container with a volume of one liter (1.057 quart) or less and do not apply to any aerosol coating product.

Conditions:

1. Pursuant to Rule 74.2.B.1, the volatile organic compound (VOC) content of architectural coatings shall not exceed the following standards, as found in Table 2 of Rule 74.2.B.1, unless specifically exempted by Rule 74.2:
   a. The VOC content of flat coatings shall not exceed 50 grams per liter of coating.
   b. The VOC content of nonflat coatings shall not exceed 100 grams per liter of coating.
   c. The VOC content of nonflat-high gloss coatings shall not exceed 150 grams per liter of coating.

   Limits are expressed as VOC Regulatory (unless otherwise specified in Rule 74.2) thinned to the manufacturer’s maximum recommendation, excluding colorant added to the tint bases. VOC Regulatory is defined in Rule 74.2.

2. Pursuant to Rule 74.2.B.1, the VOC content of specialty architectural coatings shall not exceed the VOC limits in the Table of Standards in Rule 74.2, unless specifically exempted by Rule 74.2.

   Specifically, the VOC content of industrial maintenance coatings shall not exceed 250 grams per liter of coating.
Limits are expressed as VOC Regulatory (unless otherwise specified in Rule 74.2) thinned to the manufacturer’s maximum recommendation, excluding colorant added to the tint bases. VOC Regulatory is defined in Rule 74.2.

3. Pursuant to Rule 74.2.B.4, all architectural coating containers used to apply the contents therein to a surface directly from the container by pouring, siphoning, brushing, rolling, padding, ragging or other means, shall be closed when not in use. These architectural coating containers include, but are not limited to, drums, buckets, cans, pails, trays or other application containers. Containers of any VOC-containing materials used for thinning and cleanup shall also be closed when not in use.

4. Pursuant to Rule 74.2.B.5, no person who applies or solicits the application of any architectural coating shall apply or solicit the application of any coating that is thinned to exceed the applicable VOC limit specified in the Tables in Subsection B.1.

5. Permittee shall perform routine surveillance of the architectural coating operation to ensure that compliance with Rule 74.2 is being maintained. Permittee shall specify the usage of compliant coatings and shall maintain VOC records of coatings used at the stationary source. This information shall be submitted to the District upon request.

6. The VOC content of architectural coatings, along with other specified physical and chemical properties, shall be measured using the testing procedures in Rule 74.2.G.
Ventura County Air Pollution Control District
Rule 74.4.D Applicable Requirements
Cutback Asphalt - Road Oils

Rule 74.4, "Cutback Asphalt"
Adopted 07/05/83, Federally-Enforceable

Applicability:

This attachment applies to short term activities involving the application of road oils for road, highway or street paving and maintenance. For the purpose of Rule 74.4, road oil shall be synonymous with slow cure asphalt.

Conditions:

1. Pursuant to Rule 74.4.D, road oils used for highway or street paving or maintenance applications shall contain no more than 0.5 percent of organic compounds which boil at less than 500°F as determined by ASTM D402.

2. Permittee shall sample and test oil being proposed for usage in order to ensure that compliance with Rule 74.4.D is being maintained. Permittee shall maintain records of oil analyses at the facility and submit these records to the District upon request.
Ventura County Air Pollution Control District
40 CFR Part 61, Subpart M Applicable Requirements
National Emission Standard for Asbestos

40 CFR Part 61, Subpart M, "National Emission Standard for Asbestos"
Federally-Enforceable

Applicability:

This attachment applies to short term activities conducted at this facility pertaining to procedures for asbestos demolition or renovation activities as detailed in 40 CFR Part 61.145.

As defined in 40 CFR Part 61.141, asbestos means the asbestiform varieties of serpentinite (chrysotile), riebeckite (crocidolite), cummingtonite-grunerite, anthophyllite, and actinolite-tremolite. Renovation means altering a facility or one or more facility components in any way, including the stripping or removal of regulated asbestos containing material (RACM) from a facility component. Operations in which load-supporting structural members are wrecked or taken out are demolitions.

Conditions:

1. Permittee shall insure compliance with 40 CFR Part 61 Subpart M, "National Emission Standard for Asbestos". The owner or operator of a demolition or renovation activity, as defined in 40 CFR Part 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR Part 61.145, "Standards for Demolition and Renovation".

2. During times when asbestos renovation or demolition are underway at the facility, permittee shall ensure that all applicable requirements of 40 CFR Part 61.145 are met.
10. GENERAL PERMIT CONDITIONS

This section contains general Part 70 permit conditions and general APCD permit to operate conditions. The general Part 70 permit conditions are associated with general federal requirements that apply to all Title V facilities. These conditions are based on APCD Rules 8, 30, 32, and 33, and 40 CFR Part 70.

The general permit to operate conditions are associated with general District requirements that apply to all operating Title V facilities. These conditions are based on APCD Rules 19, 20, 22, and 27.
1. The permittee shall comply with all federally-enforceable conditions of the Part 70 permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of an application for reissuance of the permit. (40 CFR 70.6(a)(6)(i), APCD Rule 33.3.B.1)

2. The permittee shall continue to comply with all the applicable requirements with which the company has certified that it is already in compliance. The permittee shall comply in a timely manner with applicable requirements that become effective during the permit term of this permit.

3. The permittee shall promptly report deviations from Part 70 permit requirements, including those attributable to upset conditions as defined in the Part 70 permit, the probable cause of the deviations, and any corrective actions or preventive measures taken. Promptly is defined as no later than four (4) hours after its detection by such owner or operator, or his agents or employees. (40 CFR 70.6(a)(3)(iii)(B), APCD Rule 33.3.A.3, APCD Rule 32.B.1)

4. The need to halt or reduce activity is not a defense. It shall not be a defense for a permittee in an enforcement action that it would be necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Part 70 permit. (40 CFR 70.6(a)(6)(ii), APCD Rule 33.3.B.2)

5. All required records, monitoring data, and support information shall be maintained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 permit. All applicable reports shall be submitted to the District every 6 months and shall be certified by a responsible official. Such reports shall identify any deviations from Part 70 permit conditions. (40 CFR 70.6(a)(3)(ii)(B), 40 CFR 70.6(a)(3)(iii)(A), APCD Rule 33.3.A.3)

6. The permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 permit or to determine compliance with the Part 70 permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the Part 70 permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator of the EPA along with a claim of confidentiality. (40 CFR 70.6(a)(6)(v), APCD Rule 33.3.B.5)
7. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the District or an authorized representative to perform the following:

a. Enter upon the permittee’s premises where a Part 70 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the Part 70 permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the Part 70 permit;

c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the Part 70 permit; and

d. As authorized by the federal Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the Part 70 permit or applicable requirements.

(40 CFR 70.6(c)(2), APCD Rule 8, APCD Rule 33.3.B.7)

8. The Part 70 permit may be modified, revoked, reopened, reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (40 CFR 70.6(a)(6)(iii), APCD Rule 33.3.B.3)

9. A Part 70 permit shall be reopened under the following conditions:

a. Additional applicable requirements under the federal Clean Air Act become applicable to the facility with a remaining Part 70 permit term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the Part 70 permit is due to expire, unless the original Part 70 permit or any of its terms and conditions has been extended pursuant to APCD Rule 33.6.D;

b. Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator of the EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 permit;
c. The District or EPA determines that the Part 70 permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 permit; or

d. The Administrator of the EPA or the District determines that the Part 70 permit must be revised or revoked to assure compliance with the applicable requirements.

(40 CFR 70.7(f), APCD Rule 33.8.A)

10. All fees required by District Regulation III, Fees, shall be paid on a timely basis as requested by the District. Notwithstanding the term of the Part 70 permit, if the permittee fails to pay the annual renewal fees required pursuant to APCD Rule 42.H within the time period specified in APCD Rule 30, the Part 70 permit will be void. (40 CFR 70.6(a)(7), APCD Rule 30, APCD Rule 33.3.B.6)

11. The Part 70 permit does not convey any property rights of any sort, or any exclusive privilege. (40 CFR 70.6(a)(6)(iv), APCD Rule 33.3.B.4)

12. The provisions of this Part 70 permit shall be severable, and in the event of any challenge to any portion of the permit, or if any portion is held invalid, the remaining permit conditions shall remain valid and in force. (40 CFR 70.6(a)(5), APCD Rule 33.3.B.8)

13. An application for reissuance of this Part 70 Permit shall be submitted no more than 18 months prior to the expiration date and no less than 6 months prior to the expiration date as stated on this permit. The application shall be subject to the same procedural requirements, including those for public participation and EPA review, that apply to initial Part 70 permit issuance. (40 CFR 70.5(a)(1)(iii), 40 CFR 70.7(c)(1)(i), APCD Rule 33.6.B)

14. Any Part 70 application and any document, including reports, schedule of compliance progress reports, and compliance certification, required by this Part 70 permit shall be certified by a responsible official. The certification shall state that, based on information and belief formed after a reasonable inquiry, the statements and information in the document are true, accurate, and complete (40 CFR 70.5(d), APCD Rule 33.9.C)

15. Permittee shall submit a certification of compliance with all applicable requirements and all Part 70 permit conditions. A compliance certification shall be submitted with any Part 70 permit application and annually, on the anniversary date of the Part 70 permit, or on a more frequent schedule if required by an applicable requirement or permit condition.

This compliance certification shall identify each applicable requirement or condition of the Part 70 permit, the compliance status of the stationary source, whether the compliance
was continuous or intermittent since the last certification, and the method(s) used to
determine compliance. In addition, the certification shall indicate the stationary source's
compliance status with any applicable enhanced monitoring and compliance certification
requirement of the federal Clean Air Act. A copy of each compliance certification shall
be submitted to EPA Region IX. (40 CFR 70.5(c)(9), 40 CFR 70.6(c)(5), APCD Rule
33.3.A.9, APCD Rule 33.9.B)
Ventura County Air Pollution Control District
General Permit to Operate Conditions

1. Within 30 days after receipt of a permit to operate, the permittee may petition the Hearing Board, in writing, to review any new or modified condition on the permit. (APCD Rule 22)

2. This permit to operate, or a copy, shall be posted reasonably close to the subject equipment and shall be readily accessible to inspection personnel from the District. Posting a copy of the “Permitted Equipment and Applicable Requirements Table” contained in Section No. 2 will fulfill this requirement if the entire permit to operate is readily available at another location at the stationary source. (APCD Rule 19)

3. This permit to operate is not transferable from one location to another unless the equipment is specifically listed as being portable. (APCD Rule 20)

4. If, within a reasonable amount of time, any permittee refuses to furnish information requested by the District, the District may suspend this permit to operate. The permittee will be informed, in writing, of the permit suspension and the reasons for the suspension. (APCD Rule 27)
11. MISCELLANEOUS FEDERAL PROGRAM CONDITIONS

This section contains miscellaneous federal program conditions that are not emission unit-specific or short-term. These federal requirements are broadly applicable requirements that apply and are enforced in the same manner for all subject emissions units or short-term activities. Permit conditions associated with these miscellaneous federal program requirements are listed in an individual attachments. The attachment is identified with the label “Attachment 40CFR(Part No.) ___” in the lower left corner of each attachment.
40 CFR Part 68, "List of Regulated Substances and Thresholds for Accidental Release Prevention"
Federally-Enforceable

Applicability:

This attachment applies to regulated substances that are contained in a process at this stationary source and that exceed the threshold quantity, as presented in 40 CFR Part 68.130. This regulation addresses the requirements of section 112(r) of the federal Clean Air Act as amended. Specifically, this attachment applies to a facility that has stated that a federal Risk Management Plan pursuant to section 112(r) is currently not required, but where flexibility is desired to preclude a permit reopening should 40 CFR Part 68 become an applicable requirement. This stationary source does utilize a regulated substance, anhydrous ammonia (NH₃); however, the application states that the stored amount is less than the 10,000 pound threshold.

Conditions:

1. Should the stationary source, as defined in 40 CFR Part 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in Part 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 CFR Part 70.
Ventura County Air Pollution Control District
40 CFR Part 82 Applicable Requirements
Protection of Stratospheric Ozone

40 CFR Part 82, "Protection of Stratospheric Ozone"
40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners"
40 CFR Part 82, Subpart F, "Recycling and Emissions Reduction"
Federally-Enforceable

Applicability:

This attachment applies to activities conducted at this facility that involve producing, importing, exporting, or consuming of the specified controlled substances described under 40 CFR Part 82.4. Specifically, this attachment includes the requirements of 40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners", and 40 CFR Part 82, Subpart F, "Recycling and Emissions Reduction".

As defined in 40 CFR 82.30, 40 CFR Part 82, Subpart B applies to any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner.

As defined in 40 CFR Part 82.150, 40 CFR Part 82, Subpart F applies to any person servicing, maintaining or repairing appliances, except for motor vehicle air conditioners. This subpart also applies to persons disposing of appliances, including motor vehicle air conditioners. An appliance is any device which uses a class I or class II substance as a refrigerant and which is used for household or commercial purposes, including any air conditioner, refrigerator, chiller, or freezer.

Conditions:

1. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners".

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
2. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee is subject to all of the applicable requirements as specified in 40 CFR Part 82, Subpart F, "Recycling and Emissions Reduction".
40 CFR Part 60, Subpart Dc, “Standards of Performance for Small Industrial - Commercial - Institutional Steam Generating Units”

**Permit Shield:**

The New Source Performance Standard listed above has been reviewed; and it has been determined that it is not applicable to this stationary source. The following discussion details the determination of this permit shield for the two 31 MMBTU/Hr Babcock and Wilcox Steam Boilers. The units burn natural gas as the primary fuel and burn fuel oil only during periods when natural gas is not available due to curtailment.

40 CFR Part 60, Subpart Dc is applicable to steam generating units for which construction, modification, or reconstruction was commenced after June 9, 1989; and that have a maximum design heat input capacity of 29 megawatts (100 million BTU/Hr) or less, but greater than or equal to 2.9 megawatts (10 million BTU/Hr). Since construction of these two (2) 31 MMBTU/Hr boilers commenced prior to June 9, 1989; and since the units have not undergone any reconstruction or modifications, as defined in the New Source Performance Standards, Subpart Dc of 40 CFR Part 60 is not applicable to this stationary source.
Ventura County Air Pollution Control District
Permit Shield – Standards of Performance for Stationary Combustion Turbines
40 CFR Part 60, Subpart KKKK


**Permit Shield:**

The requirements of 40 CFR Part 60, Subpart KKKK, “Standards of Performance for Stationary Combustion Turbines” have been reviewed; and it has been determined that this federal regulation is not applicable to this stationary source. The following discussion details the determination of this permit shield for the GE LM 2500-33 Turbine.

**Discussion:**

40 CFR Part 60, Subpart KKKK, is applicable to stationary combustion turbines with a heat input at peak load equal to or greater than 10 MMBTU/hr which commenced construction, modification, or reconstruction after February 18, 2005. The GE LM 2500-33 Turbine is rated at 255.7 MMBTU/hr; however, it was constructed prior to February 18, 2005. The turbine has been a part of Part 70 Permit No. 01267 since it was initially issued on April 1, 1999. The unit has been permitted with the District since December 28, 1989. Construction of the turbine was initiated in 1986.
Ventura County Air Pollution Control District
Permit Shield – National Emission Standards for Hazardous Air Pollutants
40 CFR Part 63, Subpart YYYYY


Permit Shield:

The requirements of 40 CFR Part 63, Subpart YYYYY, “National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines” have been reviewed; and it has been determined that this federal regulation is not applicable to this stationary source. The following discussion details the determination of this permit shield for the GE LM 2500-33 Turbine.

Discussion:

40 CFR Part 63, Subpart YYYYY, is applicable to stationary combustion turbines that operate at a major source of HAP (Hazardous Air Pollutant) emissions. A stationary source is a major source of HAP emissions when the HAP emissions exceed thresholds of 10 tons per year of a single HAP or 25 tons per year of combined HAPs. Emissions at this stationary source do not exceed these HAP thresholds; therefore, the stationary source is not a major source of HAP emissions. The HAP emissions for the stationary source are shown in the Reissuance Application.
Ventura County Air Pollution Control District
Permit Shield
National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources


Permit Shield:

The requirements of 40 CFR Part 63, Subpart JJJJJJ, “National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources” have been reviewed; and it has been determined that the boilers at this stationary source are not subject to this federal regulation. The following discussion details the determination of this permit shield for the two (2) 31 MMBTU/hr Babcock & Wilcox Steam Boilers. The units are fired on natural gas with Fuel Oil as a standby fuel.

Discussion:

Section 63.1195(e) of 40 CFR Part 63, Subpart JJJJJJ, states that gas-fired boilers are not subject to Subpart JJJJJJ. Gas-fired boilers are defined in the subpart as any boiler that burns gaseous fuels not combined with any solid fuels and burns liquid fuels only during periods of gas curtailment, gas supply interruption, startups, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year (Section 63.11237). The use of the two (2) 31 MMBTU/hr Babcock & Wilcox Steam Boilers meet this definition as used at this stationary source.
Ventura County Air Pollution Control District  
Permit Shield - Acid Rain Program  
40 CFR Parts 72 - 78

40 CFR Part 72, “Permits Regulation”

40 CFR Part 73, “Sulfur Dioxide Allowance System”

40 CFR Part 74, “Sulfur Dioxide Opt-Ins”

40 CFR Part 75, “Continuous Emission Monitoring”


40 CFR Part 77, “Excess Emissions”


**Permit Shield:**

The Acid Rain Program requirements listed above have been reviewed; and it has been determined that they are not applicable to the LM 2500-33 natural gas-fired turbine at this stationary source. The following discussion details the determination of this permit shield for the LM 2500-33 natural gas-fired turbine that drives a 21.5 MW electrical generator.

Pursuant to 40 CFR Part 72.6(b)(1), a simple combustion turbine that commenced operation before November 15, 1990 is not an affected unit subject to the requirements of the Acid Rain Program. A simple combustion turbine is a unit that is a rotary engine driven by a gas under pressure that is created by the combustion of any fuel. This term includes combined cycle units without auxiliary firing. A combined cycle unit captures the hot air exiting the turbine through a heat recovery steam generator or a waste heat boiler. Since the LM 2500-33 turbine is a simple combustion turbine that commenced operation before November 15, 1990, it is not subject to the Acid Rain Program.

This permit shield shall remain in effect as long as: (1) no physical modification is made to the LM 2500-33 gas turbine that would make it an affected unit, and (2) the applicability requirements of the Acid Rain Program do not change such that the turbine becomes an affected unit.
12. PART 70 PERMIT APPLICATION PACKAGE

The Part 70 permit application, which was submitted by this facility, is included in this section for reference only and is not a part of the Part 70 permit.

During the processing of the permit application, additional information was submitted by the facility in response to District requests. This additional information is included with the application. If the applicant was asked to replace a page or a portion of the application, the original submittal is stamped "REPLACED" and the replacement page or section is placed in front of the original. The applicant and District correspondence for the Part 70 permit application is located in the District permit file for this stationary source.