

February 14, 2008

Mr. Keith Duvall
Ventura County Air Pollution Control District
669 County Square Drive
Ventura, CA 93003

**PART 70 ANNUAL COMPLIANCE CERTIFICATION REPORT
VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT PERMIT
NO. 01399 – OXNARD LANDFILLS**

Enclosed is the Part 70 Compliance Certification Report for the Oxnard Landfills.

Please call me at 805-658-4617 if you have any questions.

Jason Siegert /dd

JASON SIEGERT – ENVIRONMENTAL ANALYST

Pc/Enc.

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM

Cover Sheet

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

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


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

Confidentiality

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

Certification by Responsible Official

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

Signature and Title of Responsible Official:  Title: <i>Director of operations</i>	Date: <i>2-13-08</i>
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Time Period Covered by Compliance Certification:

1 / 1 / 2007 (MM/DD/YY) to *12 / 31 / 2007* (MM/DD/YY)

1. 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.a - Specific Applicable Requirements
- Table 1.b - Permit-Specific Conditions
- Table 1.c - General Applicable Requirements
- Table 1.d - General Requirements for Short-Term Activities

1a. 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.

Attachment No./Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
74.17.1N3	Rule 74.17.1	<ul style="list-style-type: none"> • Annual compliance certification • Monitor landfill gas flow rate to off-site engines • Monitor flare gas flow rate and flare temperature • Monitor wells and collection header (temperature, pressure, nitrogen, oxygen) • Monitor methane concentration at the surface of the landfill • Source test flare every 2 years (NMOC, NOx, and CO) 	<ul style="list-style-type: none"> • Records of waste in place and annual waste acceptance rate • Records of landfill gas flow rate to off-site engines • Records of flare testing • Records of flare temperature and landfill gas flow to the flare • Records of existing wells, newly installed wells, and planned wells • Records of methane concentration at the landfill surface • Records of asbestos-containing or non-degradable waste • Records of exceedances 	<ul style="list-style-type: none"> • Reports of exceedances • Reports of new wells 	<ul style="list-style-type: none"> • NMOC-EPA Test Method 25 or 18 • NOx - EPA Method 7 • CO - EPA Method 10 • Calorific value - ASTM Method D1826-77 • O2 - EPA Method 3A • Exhaust Flow - F Factor EPA Method 19 • Surface Methane - EPA Method 21 	

Ib. 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.

Attachment No./Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
PO1399PC1 - Condition No. 1	Rule 26 General Recordkeeping	<ul style="list-style-type: none"> Annual compliance certification Monthly records of throughput and consumption 	<ul style="list-style-type: none"> Monthly records of throughput and consumption 	None	None	
PO1399PC1 - Condition No. 2	Rule 29 Solvent Recordkeeping	<ul style="list-style-type: none"> Monthly records of solvent purchase and usage 	<ul style="list-style-type: none"> Records of solvent purchase and usage 	None	None	District enforceable only
PO1399PC2 - Condition No. 1	Rule 26 Annual Flare Combustion Limit	<ul style="list-style-type: none"> Annual compliance certification Landfill gas flow rate and heating value 	<ul style="list-style-type: none"> Landfill gas flow rate and heating value 	None	None	
PO1399PC2 - Condition No. 2	Rule 26 Flare BACT Limits	<ul style="list-style-type: none"> Annual compliance certification Flare temperature Testing every 2 years (ROC, NOx) 	<ul style="list-style-type: none"> Records of flare temperature Records of source tests 	None	<ul style="list-style-type: none"> ROC-EPA Test Method 25 or 18 NOx - EPA Method 7 	
PO1399PC2 - Condition No. 3	Rule 52	<ul style="list-style-type: none"> Annual compliance certification 	<ul style="list-style-type: none"> None 	None	None	Not required based on District EPA emission factor analysis
PO1399PC2 - Condition No. 4	Rule 54	<ul style="list-style-type: none"> Annual compliance certification Source test every 4 years Modeling upon request 	<ul style="list-style-type: none"> Records of source tests 	None	<ul style="list-style-type: none"> Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD Method 307-94, as appropriate 	
PO1399PC2 - Condition No. 5	Rule 57.1	<ul style="list-style-type: none"> Annual compliance certification 	<ul style="list-style-type: none"> None 	None	None	Not required based on District EPA emission factor analysis
PO1399PC2 - Condition No. 6	Rule 26 Flare Equipment Requirements	<ul style="list-style-type: none"> Annual compliance certification 	<ul style="list-style-type: none"> None 	None	None	

1b. Permit-Specific Conditions (Continued)

PO1399PC2 - Condition No. 7	Rule 26 Calibration Requirements	<ul style="list-style-type: none"> • Annual compliance certification • Calibration records 	<ul style="list-style-type: none"> • Records of calibration and function checks 	None	None	
PO1399PC2 - Condition No. 8	Rule 26 Landfill Gas Control Requirements During Maintenance	<ul style="list-style-type: none"> • Annual compliance certification • Written notification requirements • Reporting requirements 	<ul style="list-style-type: none"> • Records of maintenance activities 	None	None	
PO1399PC2 - Condition Nos. 9 and 10	Rule 51 Toxics Testing and HRA Requirements	<ul style="list-style-type: none"> • Source testing 	<ul style="list-style-type: none"> • Records of source tests 	None	APCD approved test protocol	District enforceable only

1c. 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.

Attachment No./Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
50	Rule 50	<ul style="list-style-type: none"> • Routine surveillance • Visual inspections • Annual compliance certification, including a formal survey • Opacity readings upon request • Notification required for uncorrectable visible emissions • Annual compliance certification 	<ul style="list-style-type: none"> • All occurrences of visible emissions for periods > 3min in any one hour • Annual formal survey of all emissions units 	None	<ul style="list-style-type: none"> • Opacity - EPA Method 9 	
52	Rule 52	<ul style="list-style-type: none"> • Annual compliance certification 	None	None	None	<ul style="list-style-type: none"> • Not required based on District EPA emission factor analysis
54.B.1	Rule 54.B.1	<ul style="list-style-type: none"> • Annual compliance certification • Follow monitoring requirements under Rule 64 • Upon request, source test for sulfur compounds at point of discharge 	None	None	<ul style="list-style-type: none"> • Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD Method 307-94, as appropriate 	<ul style="list-style-type: none"> • Compliance with Rule 64 ensures compliance with this rule based on District analysis
54.B.2	Rule 54.B.2	<ul style="list-style-type: none"> • Annual compliance certification • Determine ground or sea level concentrations of SO₂ upon request 	<ul style="list-style-type: none"> • Representative fuel analysis or exhaust analysis and compliance demonstration 	None	<ul style="list-style-type: none"> • SO₂ - BAAQMD Manual of Procedures, Vol. VI, Section 1, Ground Level Monitoring for H₂S and SO₂ 	
57.1	Rule 57.1	<ul style="list-style-type: none"> • Annual compliance certification 	None	None	None	<ul style="list-style-type: none"> • Not required based on District analysis
64.B.1	Rule 64.B.1	<ul style="list-style-type: none"> • 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) 	<ul style="list-style-type: none"> • Annual fuel gas analysis if gas is other than PUC-quality gas, propane, or butane 	None	<ul style="list-style-type: none"> • SCAQMD Method 307-94 	

Ic. General Applicable Requirements (Continued)

Attachment No./Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
64.B-2	Rule 64.B.2	<ul style="list-style-type: none"> Annual compliance certification Fuel supplier's certification, or fuel test per each delivery (submit with annual compliance certification) 	<ul style="list-style-type: none"> Fuel supplier's certification, or fuel test per each delivery 	None	<ul style="list-style-type: none"> ASTM Method D4294-83 or D2622-87 	
74.6(2003)	Rule 74.6	<ul style="list-style-type: none"> Annual compliance certification Maintain current solvent information Routine surveillance of solvent cleaning activities Upon request, solvent testing 	<ul style="list-style-type: none"> Records of current solvent information 	None	<ul style="list-style-type: 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	<ul style="list-style-type: none"> Annual compliance certification Maintain identification records of large water heaters and small boilers 	<ul style="list-style-type: none"> Records of current information of large water heaters and small boilers 	None	None	<ul style="list-style-type: none"> Rule only applies to future installation of large water heaters and small boilers
74.22	Rule 74.22	<ul style="list-style-type: none"> Annual compliance certification Maintain furnace identification records 	<ul style="list-style-type: none"> Records of current furnace information 	None	None	<ul style="list-style-type: none"> Rule only applies to future installation of natural gas-fired, fan-type furnaces

Id. 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.

Attachment No./Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
74.1	Rule 74.1	<ul style="list-style-type: none"> Annual compliance certification Routine surveillance and visual inspections of abrasive blasting operation Abrasive blasting records Annual compliance certification Routine surveillance Maintain VOC records of coatings used 	<ul style="list-style-type: none"> Abrasive blasting records 	None	<ul style="list-style-type: none"> Visible emission evaluation- Section 92400 of CCR 	
74.2	Rule 74.2	<ul style="list-style-type: none"> Annual compliance certification Routine surveillance Maintain VOC records of coatings used 	<ul style="list-style-type: none"> Maintain VOC records of coatings used 	None	<ul style="list-style-type: none"> Rule 74.2.G 	
74.4.D	Rule 74.4.D	<ul style="list-style-type: none"> Annual compliance certification Test ROC content of oil sample being proposed for usage 	<ul style="list-style-type: none"> Records of oil analyses 	None	<ul style="list-style-type: none"> ASTM D402 	
74.28	Rule 74.28	<ul style="list-style-type: none"> Annual compliance certification Visual inspection to ensure proper vapor control during roofing kettle operation 	None	None	None	
74.29	Rule 74.29	<ul style="list-style-type: none"> Annual compliance certification Weekly measurements of in-situ soil bioventing or bioremediation Weekly measurements of soil aeration Date and quantity of soil aerated Routine surveillance Notification required for excavation 	<ul style="list-style-type: none"> Weekly measurements of soil decontamination operation vapor concentration Date and quantity of soil aerated 	None	<ul style="list-style-type: none"> Vapor concentration- EPA Method 21 WL % of contaminant in soil-EPA Method 8015B 	
40CFR.61M	40 CFR Part 61, Subpart M	<ul style="list-style-type: none"> Annual compliance certification See 40 CFR Part 61.145 for inspection procedures 	<ul style="list-style-type: none"> See 40 CFR Part 61.145 for recordkeeping procedures 	<ul style="list-style-type: none"> See 40 CFR Part 61.145 for notification procedures 	<ul style="list-style-type: none"> See 40 CFR Part 61.145 for test methods 	

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Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
 Applicable Requirement or Part 70 Permit Condition Attachment
 Form TVPF46/12-24-98 Page 1 of 3

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Part 70 Permit No. 01399 Condition No. 74.17.1N3	Description: Rule 74.17.1 - Municipal Solid Waste Landfills.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

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

Gas at wellhead, Temperature, Gas Pressure, Oxygen Concentration - Monthly

Flare Testing – Biennial

Flare Temperature and Flow – Continuous

Existing wells, newly installed wells, planned wells – as needed

Methane testing at well surface – Quarterly – Portable Organic Vapor Analyzer

System bypass- not installed

No periods when gas system was not operating in excess of five days.

Report of installation and location of new wells or collection system expansion - no new wells were installed in 2007. Due to the construction of a golf course on the Coastal Landfill, modifications were made to the laterals and wells. No new wells were installed.

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

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

Continuous - As indicated by a continuous monitoring device

Intermittent - As indicated by non-continuous periodic monitoring

Ventura County Air Pollution Control District COMPLIANCE
CERTIFICATION PERMIT FORM

Applicable Requirement or Part 70 Permit Condition Attachment

FormTVPF46/12-24-98 Page 2 of 3

4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

Ventura County Air Pollution Control District COMPLIANCE
CERTIFICATION PERMIT FORM

Applicable Requirement or Part 70 Permit Condition Attachment

FormTVPF46/12-24-98 Page 3 of 3

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/07 to 12/31/07

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

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PO1399PC1 - CONDITION No. 1 Rule 26	Description: The annual amount of landfill gas combusted in the flare shall not exceed 711,00 million BTU's (MMBTU) per year Landfill gas may be burned in either flare or in both flares simultaneously.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

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

0 MMBTU was consumed in the flare during 2007. The limit established for the flare is 711,000 MMBTU's. Gas consumption is recorded by a totalizer. This facility is in compliance.

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

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

Continuous - As indicated by a continuous monitoring device

Intermittent - As indicated by non-continuous periodic monitoring

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

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

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

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
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01/01/07 to 12/31/07

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

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PO1399PC1 - CONDITION No. 2 Rule 29	Description: Monthly records of solvent purchase
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

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

Only non-refillable aerosol solvents are used in 14 ounce or less size containers. These are purchased one can at a time as needed. Less than five pounds of material was used during 2007.

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

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

Continuous - As indicated by a continuous monitoring device

Intermittent - As indicated by non-continuous periodic monitoring

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

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

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment
FormTVPF46/12-24-98 Page 2 of 2

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/07 to 12/31/07

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

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PO1399PC2 - CONDITION No. 1 Rule 26	Description: The annual amount of landfill gas combusted in the flare shall not exceed 711,00 million BTU's (MMBTU) per year Landfill gas may be burned in either flare or in both flares simultaneously.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

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

0 MMBTU was consumed in the flare during 2007. The limit established for the flare is 711,000 MMBTU's. This facility is in compliance.

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

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

Continuous - As indicated by a continuous monitoring device

Intermittent - As indicated by non-continuous periodic monitoring

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

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

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

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PO1399PC2 - Condition No.2 Rule 26	Description: Flare Temperature Recorder, ROC, NOX monitoring
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

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

The Flare is equipped with a temperature recording device.

ROC and NOX are source tested every two years – See attached Summary of Results most recent Source tests November 16, 2006.

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

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

Continuous - As indicated by a continuous monitoring device

Intermittent - As indicated by non-continuous periodic monitoring

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

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

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

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/07 to 12/31/07

5.0 SUMMARY OF RESULTS (Continued)

TABLE 5-2
GENERAL RESULTS
VRSD- Coastal Flares
Flare #2
November 16, 2006

Parameter	INLET				EXHAUST			
	First Run	Second Run	Third Run	Average	First Run	Second Run	Third Run	Average
O ₂ , %	7.65	7.57	7.78	7.67	11.31	11.48	11.81	11.53
CO ₂ , %	20.3	20.3	20.0	20.2	8.22	8.06	7.70	7.99
N ₂ , %	43.4	42.9	43.8	43.4	80.5	80.5	80.5	80.5
H ₂ O, %	5.9	7.8	5.7	6.47	8.00	4.73	7.63	6.79
Flow Rate, wscfm	1,484.6	1,487.7	1,477.7	1,483.3	9,976	9,704	9,865	9,849
Flow Rate, dscfm	1,397.0	1,371.7	1,393.5	1387	8,911	9,178	9,246	9,112
Temperature, °F	125.0	125.0	124.0	124.7	1,474	1,454	1,459	1,462
Btu/scf	275	277	272	275				
MIM Btu/Hr	24.50	24.73	24.12	24.45				
NO _x :								
ppm					9.26	10.09	9.40	9.58
ppm @ 3% O ₂					17.3	19.2	18.5	18.3
lb/hr (as NO ₂)					0.59	0.66	0.62	0.62
lb/MM Btu (as NO ₂)					0.024	0.027	0.026	0.026
CO: ⁽¹⁾								
ppm					20.0	20.0	20.0	20.0
ppm @ 3% O ₂					37.3	38.0	39.4	38.2
lb/hr					0.775	0.798	0.804	0.792
lb/MM Btu					0.032	0.032	0.033	0.032
Hydrocarbons:								
CH ₄ , ppm	210,000	269,000	268,000	249,000	< 1	< 1	< 1	< 1
Ethane, ppm	7.59	5.92	7.19	6.90	< 1	< 1	< 1	< 1
TGNMIO, ppm (as CH ₄)	660	849	873	794	< 16.8	< 5.86	< 4.21	< 8.96
TGNMIO, lb/hr (as CH ₄)	2.29	2.89	3.02	2.73	< 0.37	< 0.13	< 0.10	< 0.20
TGNMIO, ppm (as hexane)	110.0	141.5	145.5	132.3	< 2.80	< 0.98	< 0.70	< 1.49
TGNMIO, ppm @ 3% O ₂ (as hexane)	148.6	190.0	198.5	179.0	< 5.22	< 1.86	< 1.38	< 2.82
TGNMIO, lb/hr (as hexane)	2.05	2.59	2.71	2.45	< 0.33	< 0.12	< 0.09	< 0.18
Destruction Eff. %					> 83.76	> 95.38	> 96.46	> 91.87
Sulfur Compounds:								
H ₂ S, ppm	4.00	3.18	3.04	3.41				
Carbonyl Sulfide, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Methyl Mercaptan, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Ethyl Mercaptan, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Dimethyl Sulfide, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Carbon Disulfide, ppm	< 0.1	< 0.1	< 0.1	< 0.1				
isopropyl mercaptan, ppm	< 0.1	< 0.1	< 0.1	< 0.1				
n-propyl mercaptan, ppm	< 0.1	< 0.1	< 0.1	< 0.1				
Dimethyl Disulfide, ppm	< 0.1	< 0.1	< 0.1	< 0.1				
Total Sulfur Compounds,								
Total Reduced Sulfur Inlet, ppm	4.00	3.18	3.04	3.41				
SO _x Exhaust, lb/hr (as SO ₂)					0.056	0.043	0.042	0.047

The exhaust volume flow values are based on EPA Method 19.

⁽¹⁾ CO ppm values were set to 10% of the selected range (0-200 ppm).

5.0 SUMMARY OF RESULTS

TABLE 5-1
SUMMARY OF TEST RESULTS
VRSD- Coastal Flares
Flare #2
November 16, 2006

PARAMETER	INLET	EXHAUST	PERMIT LIMIT
O ₂ , %	7.67	11.53	
CO ₂ , %	20.20	7.99	
N ₂ , %	43.35	80.47	
H ₂ O, %	6.47	6.79	
Flow Rate, wscfm	1483.3	9,849	
Flow Rate, dscfm	1387.4	9,112	<1,500 Inlet
Temperature, °F	125	1,462.2	1400
Btu/scf	274.7		
MMBtu/Hr	24.45		
NO _x :			
ppm		9.6	
ppm @ 3% O ₂		18.3	
lb/hr (as NO ₂)		0.62	2.43
lb/day (as NO ₂)		15.0	
lb/MMBtu (as NO ₂)		0.026	0.06 Rule 74.17.1
lb/MMCF (as NO ₂)		7.49	
CO: ⁽¹⁾			
ppm		20.0	
ppm @ 3% O ₂		38.2	
lb/hr		0.79	8.10
lb/day		19.0	
lb/MMBtu		0.032	0.2 Rule 74.17.1
lb/MMCF		9.51	
Hydrocarbons:			
CH ₄ , ppm	249,000	< 1.00	
TGNMO, ppm (as CH ₄)	794	< 8.96	
TGNMO, lb/hr (as CH ₄)	2.7	< 0.20	1.59
TGNMO, lb/MMBtu (as CH ₄)	-	< 0.008	
TGNMO, lb/day (as CH ₄)	65.6	< 4.82	
TGNMO, ppm (as hexane)		< 1.49	
TGNMO, ppm @ 3% O ₂ (as hexane)		< 2.82	20
TGNMO, lb/hr (as hexane)		< 0.18	
Destruction Eff. %		> 91.87	
lb/MMCF		< 2.16	
Total Sulfur Compounds,			
Total Reduced Sulfur Inlet, ppm	3.41		
SO _x Exhaust, lb/hr (as SO ₂) ⁽¹⁾		0.05	0.41
SO _x Exhaust, lb/day (as SO ₂) ⁽¹⁾		1.13	
lb/MMCF		0.56	

Notes:

The results in this table are the averages of all measurements.

⁽¹⁾ CO ppm values were set to 10% of the selected range (0-200 ppm).

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

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PO1399PC2 - Condition No.3	Description: Rule 52, Particulate Matter – Concentration (Grain Loading)
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

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

Periodic Monitoring is not necessary to certify compliance with Rule 52. EPA particulate matter emission factors for landfill gas flares indicate that each flare will comply with Rule 52. To certify compliance, a reference to EPA emission factors is sufficient. Also see attached memo; Rule 52/AP-42 Emission Factor Comparison, from John Harader, 12/8/1997.

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

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

Continuous - As indicated by a continuous monitoring device

Intermittent - As indicated by non-continuous periodic monitoring

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

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

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

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/07 to 12/31/07

VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT

Memorandum

TO: Interested Parties

DATE: December 8, 1997

FROM: John Harader

SUBJECT: Rule 52 / AP-42 Emission Factor Comparison

District Rule 52, "Particulate Matter - Concentration (Grain Loading)", limits the concentration (or grain loading) of particulate matter. As shown on the attached copy of Rule 52, the limit is in units of Grains per Cubic Foot of Dry Gas at Standard Conditions and varies with the volume discharged (exhaust) in units of cubic feet per minute calculated at standard conditions.

In order to compare the Rule 52 emission limits to EPA AP-42 emission factors for combustion equipment, the exhaust flow rates (dcfm) listed in the rule can be converted to the fuel input rate or the horsepower input. Also the emission concentration limit of grains per dcf can be converted to pounds particulate matter emitted per fuel throughput. The attached tables (Nos. 1 - 4) state the assumptions and equations used in the conversion of the Rule 52 table. Standard F-factors (as found in 40 CFR, Part 60, Appendix A, Method 19) and Higher Heating Values were used. Typical stack oxygen percentages of three percent for external combustion, fifteen percent for diesel engines and lean burn natural gas engines, and one percent for rich burn natural gas engines were used in the conversion equations. The comparison has been done for boilers and process heaters fired on natural gas (Table 1) and Fuel Oil (Table 3) and engines fired on natural gas (Table 2) and diesel (Table 4).

For each table, the first set of columns shows the conversion of the Rule 52 exhaust flow rates (dcfm) to fuel input rates (MMBTU/Hr) for the external combustion units or the equivalent horsepower input for the engines. The second set of columns shows the conversion of the grains per dscf concentration limit to a pounds particulate matter per fuel throughput limit. The third set of columns lists the EPA AP-42 emission factors and asks if the AP-42 emission factor is less than the emission factor generated from Rule 52.

The EPA AP-42 emission factors are less than the emission limits imposed by Rule 52 for all fuel input rates of boilers and process heaters on either natural gas or fuel oil; for all rich burn natural gas engines; for lean burn engines up to 387,590 BHP; and for diesel engines up to 146,970 BHP. Natural gas engines greater than 387,590 BHP and Diesel engines greater than 146,970 BHP are uncommon; and the District does not have any engines of these sizes on permit. Therefore, the EPA AP-42 particulate matter

emission factors, which are used for District Permitted Emission calculations, are less than the limits imposed by Rule 52 for boilers, process heaters, and engines: Rule 52 does not apply to steam generators or gas turbines.

m:\titlev\rule52comp

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

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PO1339PC2 Condition No. 4	Description: Rule 54, Sulfur Compounds
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

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

Bi-annual source monitoring is attached in the Summary of Test Results, November 16, 2006.

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

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

Continuous - As indicated by a continuous monitoring device

Intermittent - As indicated by non-continuous periodic monitoring

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

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

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment
FormTVPF46/12-24-98 Page 2 of 2

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/07 to 12/31/07

5.0 SUMMARY OF RESULTS (Continued)

TABLE 5-2
GENERAL RESULTS
VRSD- Coastal Flares
Flare #2
November 16, 2006

Parameter	INLET				EXHAUST			
	First Run	Second Run	Third Run	Average	First Run	Second Run	Third Run	Average
O ₂ , %	7.65	7.57	7.78	7.67	11.31	11.48	11.81	11.53
CO ₂ , %	20.3	20.3	20.0	20.2	8.22	8.06	7.70	7.99
N ₂ , %	43.4	42.9	43.8	43.4	80.5	80.5	80.5	80.5
H ₂ O, %	5.9	7.8	5.7	6.47	8.00	4.73	7.63	6.79
Flow Rate, wscfm	1,484.6	1,487.7	1,477.7	1,483.3	9,976	9,704	9,865	9,849
Flow Rate, dscfm	1,397.0	1,371.7	1,393.5	1387	8,911	9,178	9,246	9,112
Temperature, °F	125.0	125.0	124.0	124.7	1,474	1,454	1,459	1,462
Btu/scf	275	277	272	275				
MilBtu/Hr	24.50	24.73	24.12	24.45				
NO _x :								
ppm					9.26	10.09	9.40	9.58
ppm @ 3% O ₂					17.3	19.2	18.5	18.3
lb/hr (as NO ₂)					0.59	0.66	0.62	0.62
lb/MM Btu (as NO ₂)					0.024	0.027	0.026	0.026
CO: ⁽¹⁾								
ppm					20.0	20.0	20.0	20.0
ppm @ 3% O ₂					37.3	38.0	39.4	38.2
lb/hr					0.775	0.798	0.804	0.792
lb/MM Btu					0.032	0.032	0.033	0.032
Hydrocarbons:								
CH ₄ , ppm	210,000	269,000	268,000	249,000	< 1	< 1	< 1	< 1
Ethane, ppm	7.59	5.92	7.19	6.90	< 1	< 1	< 1	< 1
TGNMO, ppm (as CH ₄)	660	849	873	794	< 16.8	< 5.86	< 4.21	< 8.96
TGNMO, lb/hr (as CH ₄)	2.29	2.89	3.02	2.73	< 0.37	< 0.13	< 0.10	< 0.20
TGNMO, ppm (as hexane)	110.0	141.5	145.5	132.3	< 2.80	< 0.98	< 0.70	< 1.49
TGNMO, ppm @ 3% O ₂ (as hexane)	148.6	190.0	198.5	179.0	< 5.22	< 1.86	< 1.38	< 2.82
TGNMO, lb/hr (as hexane)	2.05	2.59	2.71	2.45	< 0.33	< 0.12	< 0.09	< 0.18
Destruction Eff. %					> 83.76	> 95.38	> 96.46	> 91.87
Sulfur Compounds:								
H ₂ S, ppm	4.00	3.18	3.04	3.41				
Carbonyl Sulfide, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Methyl Mercaptan, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Ethyl Mercaptan, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Dimethyl Sulfide, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Carbon Disulfide, ppm	< 0.1	< 0.1	< 0.1	< 0.1				
isopropyl mercaptan, ppm	< 0.1	< 0.1	< 0.1	< 0.1				
n-propyl mercaptan, ppm	< 0.1	< 0.1	< 0.1	< 0.1				
Dimethyl Disulfide, ppm	< 0.1	< 0.1	< 0.1	< 0.1				
Total Sulfur Compounds,								
Total Reduced Sulfur Inlet, ppm	4.00	3.18	3.04	3.41				
SO _x Exhaust, lb/hr (as SO ₂)					0.056	0.043	0.042	0.047

The exhaust volume flow values are based on EPA Method 19.

(1) CO ppm values were set to 10% of the selected range (0-200 ppm).

5.0 SUMMARY OF RESULTS

TABLE 5-1
SUMMARY OF TEST RESULTS
VRSD- Coastal Flares
Flare #2
November 16, 2006

PARAMETER	INLET	EXHAUST	PERMIT LIMIT
O ₂ , %	7.67	11.53	
CO ₂ , %	20.20	7.99	
N ₂ , %	43.35	80.47	
H ₂ O, %	6.47	6.79	
Flow Rate, wscfm	1483.3	9,849	
Flow Rate, dscfm	1387.4	9,112	<1,500 Inlet
Temperature, °F	125	1,462.2	1400
Btu/scf	274.7		
MMBtu/Hr	24.45		
NO _x :			
ppm			
ppm @ 3% O ₂		9.6	
lb/hr (as NO ₂)		18.3	
lb/day (as NO ₂)		0.62	2.43
lb/MMBtu (as NO ₂)		15.0	
lb/MMCF (as NO ₂)		0.026	0.06 Rule 74.17.1
		7.49	
CO: ⁽¹⁾			
ppm			
ppm @ 3% O ₂		20.0	
lb/hr		38.2	
lb/day		0.79	8.10
lb/MMBtu		19.0	
lb/MMCF		0.032	0.2 Rule 74.17.1
		9.51	
Hydrocarbons:			
CH ₄ , ppm	249,000	< 1.00	
TGNMO, ppm (as CH ₄)	794	< 8.96	
TGNMO, lb/hr (as CH ₄)	2.7	< 0.20	1.59
TGNMO, lb/MMBtu (as CH ₄)	-	< 0.008	
TGNMO, lb/day (as CH ₄)	65.6	< 4.82	
TGNMO, ppm (as hexane)		< 1.49	
TGNMO, ppm @ 3% O ₂ (as hexane)		< 2.82	20
TGNMO, lb/hr (as hexane)		< 0.18	
Destruction Eff. %		> 91.87	
lb/MMCF		< 2.16	
Total Sulfur Compounds,			
Total Reduced Sulfur Inlet, ppm	3.41		
SO _x Exhaust, lb/hr (as SO ₂) ⁽¹⁾		0.05	0.41
SO _x Exhaust, lb/day (as SO ₂) ⁽¹⁾		1.13	
lb/MMCF		0.56	

Notes:

The results in this table are the averages of all measurements.

⁽¹⁾ CO ppm values were set to 10% of the selected range (0-200 ppm).

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

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PO1399PC2 Condition No. 5	Description: Rule 57.1, Combustion Contaminates- Specific Fuel Burning Equipment.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

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

Periodic Monitoring is not necessary to certify compliance with Rule 57.1, District analysis of Rule 57.1 compliance based on EPA emission factors.

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

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

Continuous - As indicated by a continuous monitoring device

Intermittent - As indicated by non-continuous periodic monitoring

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

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

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

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/07 to 12/31/07

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

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PO1399PC2 – Condition No. 6	Description: Rule 26, Carbon Monoxide.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

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

Bi-annual flare testing conducted on November 16, 2006. Results attached.

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

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

Continuous - As indicated by a continuous monitoring device

Intermittent - As indicated by non-continuous periodic monitoring

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

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

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment
FormTVPF46/12-24-98 Page 2 of 2

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/07 to 12/31/07

5.0 SUMMARY OF RESULTS (Continued)

TABLE 5-2
GENERAL RESULTS
VRSD- Coastal Flares
Flare #2
November 16, 2006

Parameter	INLET				EXHAUST			
	First Run	Second Run	Third Run	Average	First Run	Second Run	Third Run	Average
O ₂ , %	7.65	7.57	7.78	7.67	11.31	11.48	11.81	11.53
CO ₂ , %	20.3	20.3	20.0	20.2	8.22	8.06	7.70	7.99
N ₂ , %	43.4	42.9	43.8	43.4	80.5	80.5	80.5	80.5
H ₂ O, %	5.9	7.8	5.7	6.47	8.00	4.73	7.63	6.79
Flow Rate, wscfm	1,484.6	1,487.7	1,477.7	1,483.3	9,976	9,704	9,865	9,849
Flow Rate, dscfm	1,397.0	1,371.7	1,393.5	1387	8,911	9,178	9,246	9,112
Temperature, °F	125.0	125.0	124.0	124.7	1,474	1,454	1,459	1,462
Btu/sec	275	277	272	275				
MMBtu/Hr	24.50	24.73	24.12	24.45				
NO _x :								
ppm					9.26	10.09	9.40	9.58
ppm @ 3% O ₂					17.3	19.2	18.5	18.3
lb/hr (as NO ₂)					0.59	0.66	0.62	0.62
lb/MM Btu (as NO ₂)					0.024	0.027	0.026	0.026
CO: ⁽¹⁾								
ppm					20.0	20.0	20.0	20.0
ppm @ 3% O ₂					37.3	38.0	39.4	38.2
lb/hr					0.775	0.798	0.804	0.792
lb/MM Btu					0.032	0.032	0.033	0.032
Hydrocarbons:								
CH ₄ , ppm	210,000	269,000	268,000	249,000	< 1	< 1	< 1	< 1
Ethane, ppm	7.59	5.92	7.19	6.90	< 1	< 1	< 1	< 1
TGNMIO, ppm (as CH ₄)	660	849	873	794	< 16.8	< 5.86	< 4.21	< 8.96
TGNMIO, lb/hr (as CH ₄)	3.29	2.89	3.02	2.73	< 0.37	< 0.13	< 0.10	< 0.20
TGNMIO, ppm (as hexane)	110.0	141.5	145.5	132.3	< 2.80	< 0.98	< 0.70	< 1.49
TGNMIO, ppm @ 3% O ₂ (as hexane)	148.6	190.0	198.5	179.0	< 5.22	< 1.86	< 1.38	< 2.82
TGNMIO, lb/hr (as hexane)	2.05	2.59	2.71	2.45	< 0.33	< 0.12	< 0.09	< 0.18
Destruction Eff. %					> 83.76	> 95.38	> 96.46	> 91.87
Sulfur Compounds:								
H ₂ S, ppm	4.00	3.18	3.04	3.41				
Carbonyl Sulfide, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Methyl Mercaptan, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Ethyl Mercaptan, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Dimethyl Sulfide, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Carbon Disulfide, ppm	< 0.1	< 0.1	< 0.1	< 0.1				
Isopropyl mercaptan, ppm	< 0.1	< 0.1	< 0.1	< 0.1				
n-propyl mercaptan, ppm	< 0.1	< 0.1	< 0.1	< 0.1				
Dimethyl Disulfide, ppm	< 0.1	< 0.1	< 0.1	< 0.1				
Total Sulfur Compounds,								
Total Reduced Sulfur Inlet, ppm	4.00	3.18	3.04	3.41				
SO _x Exhaust, lb/hr (as SO ₂)					0.056	0.043	0.042	0.047

The exhaust volume flow values are based on EPA Method 19.

⁽¹⁾ CO ppm values were set to 10% of the selected range (0-200 ppm).

5.0 SUMMARY OF RESULTS

TABLE 5-1
SUMMARY OF TEST RESULTS
VRSD- Coastal Flares
Flare #2
November 16, 2006

PARAMETER	INLET	EXHAUST	PERMIT LIMIT
O ₂ , %	7.67	11.53	
CO ₂ , %	20.20	7.99	
N ₂ , %	43.35	80.47	
H ₂ O, %	6.47	6.79	
Flow Rate, wscfm	1483.3	9,849	
Flow Rate, dscfm	1387.4	9,112	<1,500 Inlet
Temperature, °F	125	1,462.2	1400
Btu/scf	274.7		
MMBtu/Hr	24.45		
NO _x :			
ppm		9.6	
ppm @ 3% O ₂		18.3	
lb/hr (as NO ₂)		0.62	2.43
lb/day (as NO ₂)		15.0	
lb/MMBtu (as NO ₂)		0.026	0.06 Rule 74.17.1
lb/MMCF (as NO ₂)		7.49	
CO: ⁽¹⁾			
ppm		20.0	
ppm @ 3% O ₂		38.2	
lb/hr		0.79	8.10
lb/day		19.0	
lb/MMBtu		0.032	0.2 Rule 74.17.1
lb/MMCF		9.51	
Hydrocarbons:			
CH ₄ , ppm	249,000	< 1.00	
TGNMO, ppm (as CH ₄)	794	< 8.96	
TGNMO, lb/hr (as CH ₄)	2.7	< 0.20	1.59
TGNMO, lb/MMBtu (as CH ₄)	-	< 0.008	
TGNMO, lb/day (as CH ₄)	65.6	< 4.82	
TGNMO, ppm (as hexane)		< 1.49	
TGNMO, ppm @ 3% O ₂ (as hexane)		< 2.82	20
TGNMO, lb/hr (as hexane)		< 0.18	
Destruction Eff. %		> 91.87	
lb/MMCF		< 2.16	
Total Sulfur Compounds,			
Total Reduced Sulfur Inlet, ppm	3.41		
SO _x Exhaust, lb/hr (as SO ₂) ⁽¹⁾		0.05	0.41
SO _x Exhaust, lb/day (as SO ₂) ⁽¹⁾		1.13	
lb/MMCF		0.56	

Notes:

The results in this table are the averages of all measurements.

⁽¹⁾ CO ppm values were set to 10% of the selected range (0-200 ppm).

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

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number
and/or Permit Condition Number:

PO1399PC2 - Condition No. 7

Description: Rule 26, BACT. New Source Review.

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

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

Each flare shall be equipped with controllers that monitor for flame failure. This flame failure shall initiate isolation of the landfill gas supply line from the flare and the atmosphere by closing the isolation valve. Upon closing of the isolation valve, an alarm shall be activated to notify the operator of a system malfunction. In addition, the system shall be designed to automatically relight the flare should a flame failure occur. Upon the relighting of the flare, the isolation valve shall reopen to continue destruction of the landfill gas. Rule 26. These systems are in place and are operating. Annual calibration and function checks were conducted during the source tests November 16, 2006. See 2006 Compliance Source Test Report Solid Waste Field Operations Coastal Landfill on file with the VCAPCD.

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

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

Continuous - As indicated by a continuous monitoring device

Intermittent - As indicated by non-continuous periodic monitoring

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

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment
FormTVPF46/12-24-98 Page 2 of 2

5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."
6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/07 to 12/31/07

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

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number
and/or Permit Condition Number:

PO1399PC2 - Condition No. 8

Description: Rule 26 Landfill Gas Control During Maintenance

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

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

At no time during this reporting period was there a period that exceeded eight hours where all of the gas could not be consumed in the engines or the flares.

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

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

Continuous - As indicated by a continuous monitoring device

Intermittent - As indicated by non-continuous periodic monitoring

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

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

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

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/07 to 12/31/07

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

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: PO1399PC2 – Condition Nos. 9 & 10	Description: Condition Nos. 9 & 10, Rule 51 - Toxics Testing
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

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

Bi-Annual source testing was conducted November 16, 2006. Summary of results is attached. The complete report is on file with the VCAPCD.

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

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

Continuous - As indicated by a continuous monitoring device

Intermittent - As indicated by non-continuous periodic monitoring

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

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

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment
FormTVPF46/12-24-98 Page 2 of 2

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/07 to 12/31/07

5.0 SUMMARY OF RESULTS (Continued)

TABLE 5-2
GENERAL RESULTS
VRSD- Coastal Flares
Flare #2
November 16, 2006

Parameter	INLET				EXHAUST			
	First Run	Second Run	Third Run	Average	First Run	Second Run	Third Run	Average
O ₂ , %	7.65	7.57	7.78	7.67	11.31	11.48	11.81	11.53
CO ₂ , %	20.3	20.3	20.0	20.2	8.22	8.06	7.70	7.99
N ₂ , %	43.4	42.9	43.8	43.4	80.5	80.5	80.5	80.5
H ₂ O, %	5.9	7.8	5.7	6.47	8.00	4.73	7.63	6.79
Flow Rate, wscfm	1,484.6	1,487.7	1,477.7	1,483.3	9,976	9,704	9,865	9,849
Flow Rate, dscfm	1,397.0	1,371.7	1,393.5	1387	8,911	9,178	9,246	9,112
Temperature, °F	123.0	125.0	124.0	124.7	1,474	1,454	1,459	1,462
Btu/scf	275	277	272	275				
MMBtu/Hr	24.50	24.73	24.12	24.45				
NO _x :								
ppm					9.26	10.09	9.40	9.38
ppm @ 3% O ₂					17.3	19.2	18.5	18.3
lb/hr (as NO ₂)					0.59	0.66	0.62	0.62
lb/MM Btu (as NO ₂)					0.024	0.027	0.026	0.026
CO: ⁽¹⁾								
ppm					20.0	20.0	20.0	20.0
ppm @ 3% O ₂					37.3	38.0	39.4	38.2
lb/hr					0.775	0.798	0.804	0.792
lb/MM Btu					0.032	0.032	0.033	0.032
Hydrocarbons:								
CH ₄ , ppm	210,000	269,000	268,000	249,000	< 1	< 1	< 1	< 1
Ethane, ppm	7.59	5.92	7.19	6.90	< 1	< 1	< 1	< 1
TGNMO, ppm (as CH ₄)	660	849	873	794	< 16.8	< 5.86	< 4.21	< 8.96
TGNMO, lb/hr (as CH ₄)	2.29	2.89	3.02	2.73	< 0.37	< 0.13	< 0.10	< 0.20
TGNMO, ppm (as hexane)	110.0	141.5	145.5	132.3	< 2.80	< 0.98	< 0.70	< 1.49
TGNMO, ppm @ 3% O ₂ (as hexane)	148.6	190.0	198.5	179.0	< 5.22	< 1.86	< 1.38	< 2.82
TGNMO, lb/hr (as hexane)	2.05	2.59	2.71	2.45	< 0.33	< 0.12	< 0.09	< 0.18
Destruction Eff. %					> 83.76	> 95.38	> 96.46	> 91.87
Sulfur Compounds:								
H ₂ S, ppm	4.00	3.18	3.04	3.41				
Carbonyl Sulfide, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Methyl Mercaptan, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Ethyl Mercaptan, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Dimethyl Sulfide, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Carbon Disulfide, ppm	< 0.1	< 0.1	< 0.1	< 0.1				
isopropyl mercaptan, ppm	< 0.1	< 0.1	< 0.1	< 0.1				
n-propyl mercaptan, ppm	< 0.1	< 0.1	< 0.1	< 0.1				
Dimethyl Disulfide, ppm	< 0.1	< 0.1	< 0.1	< 0.1				
Total Sulfur Compounds,								
Total Reduced Sulfur Inter, ppm	4.00	3.18	3.04	3.41				
SO _x Exhaust, lb/hr (as SO ₂)					0.056	0.043	0.042	0.047

The exhaust volume flow values are based on EPA Method 19.

⁽¹⁾ CO ppm values were set to 10% of the selected range (0-200 ppm).

5.0 SUMMARY OF RESULTS

TABLE 5-1
SUMMARY OF TEST RESULTS
VRSD- Coastal Flares
Flare #2
November 16, 2006

PARAMETER	INLET	EXHAUST	PERMIT LIMIT
O ₂ , %	7.67	11.53	
CO ₂ , %	20.20	7.99	
N ₂ , %	43.35	80.47	
H ₂ O, %	6.47	6.79	
Flow Rate, wscfm	1483.3	9,849	
Flow Rate, dscfm	1387.4	9,112	<1,500 Inlet
Temperature, °F	125	1,462.2	1400
Btu/scf	274.7		
MMBtu/Hr	24.45		
NO _x :			
ppm		9.6	
ppm @ 3% O ₂		18.3	
lb/hr (as NO ₂)		0.62	2.43
lb/day (as NO ₂)		15.0	
lb/MMBtu (as NO ₂)		0.026	0.06 Rule 74.17.1
lb/MMCF (as NO ₂)		7.49	
CO: ⁽¹⁾			
ppm		20.0	
ppm @ 3% O ₂		38.2	
lb/hr		0.79	8.10
lb/day		19.0	
lb/MMBtu		0.032	0.2 Rule 74.17.1
lb/MMCF		9.51	
Hydrocarbons:			
CH ₄ , ppm	249,000	< 1.00	
TGNMO, ppm (as CH ₄)	794	< 8.96	
TGNMO, lb/hr (as CH ₄)	2.7	< 0.20	1.59
TGNMO, lb/MM Btu (as CH ₄)	-	< 0.008	
TGNMO, lb/day (as CH ₄)	65.6	< 4.82	
TGNMO, ppm (as hexane)		< 1.49	
TGNMO, ppm @ 3% O ₂ (as hexane)		< 2.82	20
TGNMO, lb/hr (as hexane)		< 0.18	
Destruction Eff. %		> 91.87	
lb/MMCF		< 2.16	
Total Sulfur Compounds,			
Total Reduced Sulfur Inlet, ppm	3.41		
SO _x Exhaust, lb/hr (as SO ₂) ⁽¹⁾		0.05	0.41
SO _x Exhaust, lb/day (as SO ₂) ⁽¹⁾		1.13	
lb/MMCF		0.56	

Notes:

The results in this table are the averages of all measurements.

⁽¹⁾ CO ppm values were set to 10% of the selected range (0-200 ppm).

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

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Condition 50	Description: Rule 50, Opacity
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

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

Visual inspection of flare and routine inspections. Flares were not used during 2007, unable to perform VCAPCD Rule 50 Opacity Annual Compliance Survey.

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

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

Continuous - As indicated by a continuous monitoring device

Intermittent - As indicated by non-continuous periodic monitoring

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

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

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

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/07 to 12/31/07

Ventura County Air Pollution Control District COMPLIANCE
CERTIFICATION PERMIT FORM

Applicable Requirement or Part 70 Permit Condition Attachment
Form TVPF46/12-24-98 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number
and/or Permit Condition Number:

Condition 52

Description: Rule 52, Particulate Matter – Concentration (Grain Loading)

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

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

Period Monitoring is not necessary to certify compliance with Rule 52. EPA particulate matter emission factors for landfill gas flares indicate that each flare will comply with Rule 52. To certify compliance, a reference to EPA emission factors is sufficient. Also see attached memo; Rule 52/AP-42 Emission Factor Comparison, from John Harader, 12/8/1997.

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if this compliance determination method is continuous or intermittent:
 Continuous - As indicated by a continuous monitoring device
 Intermittent - As indicated by non-continuous periodic monitoring
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

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

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/07 to 12/31/07

VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT

Memorandum

TO: Interested Parties

DATE: December 8, 1997

FROM: John Harader

SUBJECT: Rule 52 / AP-42 Emission Factor Comparison

District Rule 52, "Particulate Matter - Concentration (Grain Loading)", limits the concentration (or grain loading) of particulate matter. As shown on the attached copy of Rule 52, the limit is in units of Grains per Cubic Foot of Dry Gas at Standard Conditions and varies with the volume discharged (exhaust) in units of cubic feet per minute calculated at standard conditions.

In order to compare the Rule 52 emission limits to EPA AP-42 emission factors for combustion equipment, the exhaust flow rates (dcfm) listed in the rule can be converted to the fuel input rate or the horsepower input. Also the emission concentration limit of grains per dcf can be converted to pounds particulate matter emitted per fuel throughput. The attached tables (Nos. 1 - 4) state the assumptions and equations used in the conversion of the Rule 52 table. Standard F-factors (as found in 40 CFR, Part 60, Appendix A, Method 19) and Higher Heating Values were used. Typical stack oxygen percentages of three percent for external combustion, fifteen percent for diesel engines and lean burn natural gas engines, and one percent for rich burn natural gas engines were used in the conversion equations. The comparison has been done for boilers and process heaters fired on natural gas (Table 1) and Fuel Oil (Table 3) and engines fired on natural gas (Table 2) and diesel (Table 4).

For each table, the first set of columns shows the conversion of the Rule 52 exhaust flow rates (dcfm) to fuel input rates (MMBTU/Hr) for the external combustion units or the equivalent horsepower input for the engines. The second set of columns shows the conversion of the grains per dscf concentration limit to a pounds particulate matter per fuel throughput limit. The third set of columns lists the EPA AP-42 emission factors and asks if the AP-42 emission factor is less than the emission factor generated from Rule 52.

The EPA AP-42 emission factors are less than the emission limits imposed by Rule 52 for all fuel input rates of boilers and process heaters on either natural gas or fuel oil; for all rich burn natural gas engines; for lean burn engines up to 387,590 BHP; and for diesel engines up to 146,970 BHP. Natural gas engines greater than 387,590 BHP and Diesel engines greater than 146,970 BHP are uncommon; and the District does not have any engines of these sizes on permit. Therefore, the EPA AP-42 particulate matter

emission factors, which are used for District Permitted Emission calculations, are less than the limits imposed by Rule 52 for boilers, process heaters, and engines. Rule 52 does not apply to steam generators or gas turbines.

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

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Condition 54.B.1	Description: Rule 54.B.1, Sulfur Compounds
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

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

Compliance with rule 64 ensures compliance with this rule based on District analysis. See attached APCD district memos Rule 54, Sulfur compounds 12/9/1997, SOX Rule Comparison for Combustion of Gaseous Fuel 12/2/97.

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

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

Continuous - As indicated by a continuous monitoring device

Intermittent - As indicated by non-continuous periodic monitoring

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

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

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment
FormTVPF46/12-24-98 Page 2 of 2

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/07 to 12/31/07

SO_x RULE COMPARISON FOR COMBUSTION OF LIQUID FUELS

RULE 54.B.1

SO_x EXHAUST ≤ 300 ppm CALCULATED AT SO₂

DIESEL FUEL, 15% O₂

$$\left(\frac{9220 \text{ DSC:F}}{\text{MMBTU}}\right) \left(\frac{64 \text{ lb SO}_2}{\text{lb mole}}\right) \left(\frac{\text{lb mole}}{387 \text{ CF}}\right) \left(\frac{20.9}{20.9-15}\right) \left(\frac{300 \text{ ppm}}{10^6}\right) \left(\frac{141 \text{ MMBTU}}{\text{MGAL}}\right) = \boxed{228.5 \frac{\text{lb SO}_x}{\text{MGAL}}}$$

$$\text{@ } 32\% \text{ O}_2 = \boxed{75.3 \frac{\text{lb SO}_x}{\text{MGAL}}}$$

RULE 6.4.B.2

SOLID OR LIQUID FUEL SHALL NOT EXCEED
A SULFUR CONTENT OF 0.5 PERCENT, by wt.



FUEL OIL DENSITY ⇒ 7.2 lb/gal

$$\left(\frac{7.2 \text{ lb FUEL}}{\text{GAL}}\right) \left(\frac{0.5 \text{ lbs}}{100 \text{ lb FUEL}}\right) \left(\frac{\text{mole S}}{32 \text{ lbs}}\right) \left(\frac{\text{mole SO}_2}{\text{mole S}}\right) \left(\frac{64 \text{ lb SO}_2}{\text{mole SO}_2}\right) \left(\frac{1000 \text{ GAL}}{\text{MGAL}}\right) = \boxed{72.0 \frac{\text{lb SO}_2}{\text{MGAL}}}$$



To: Keith

From: Kerby Z.

RE: Rule 54.B.2

Keith,

The Title V "Attachment 54.B.2" was not necessarily intended to require full scale modeling to demonstrate compliance. We did distribute the attached memo "Rule 54.B.2 Compliance" dated May 23, 1996 to help out permit holders.

Except for someone like Pacific Custom Materials, this applies ~~only~~ to combustion equipment like engines, boilers, and turbines. At a bare minimum, they should be able to have the sulfur content of the fuel available; and some material balance calculations or source test info showing ppmv in exhaust stack.

Gas fired equipment burning PVC gas should not be a problem. For diesel fired equipment, info like stack height and property line info should be available to compare to District memo.

See me to discuss further,

Tuks,
Kerby Z.

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

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Condition 54.B.2	Description: Rule 54.B.2, Sulfur Dioxide
---	--

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

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

Pursuant to Rule 54.B.2, emissions of sulfur compounds, calculated as sulfur dioxide (SO₂), shall not result 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. According to the memo (attached) from Terri Thomas, 5/23/1996, Subject Rule 54.B.2 Compliance, this facility is in compliance for SO₂. From the table an emission rate of 0.23 lb/hr would produce a 1-hour maximum concentration of 0.06 ppmv and a 24-hour maximum concentration of 0.03, 100 meters from the stack. Our source test (attached) showed an exhaust value for SO₂ of 0.05 lb/hour. This would put the flare below the limits.

See attached source test, 11/16/2006 and VCAPCD memorandum 12/9/1997 from John Hararader, Sox Rule Comparison for combustion, Rule 54 and Rule 64.

1. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if this compliance determination method is continuous or intermittent:
 - Continuous - As indicated by a continuous monitoring device
 - Intermittent - As indicated by non-continuous periodic monitoring
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."

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

5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."
6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/07 to 12/31/07

VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT
Memorandum

TO: Karl Krause

DATE: May 23, 1996

FROM: Terri Thomas / /

SUBJECT: Rule 54.B.2 Compliance

Per your request, I ran some screening level dispersion modeling tests to determine equipment parameters that would comply with Rule 54.B.2. Rule 54.B.2 limits ground level property line SO₂ concentrations to 0.25 ppm_v for 1 hour and 0.04 ppm_v for 24 hours.

I assume that the most common SO₂ emission source is diesel combustion in IC engines. Therefore, that was the focus of my analysis.

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

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

SO₂ emissions were based on 300 ppm_v in the stack, which is the limit in Rule 54.B.1.a. This limit cannot be exceeded if the diesel fuel meets the 0.5% sulfur limit in Rule 64.B.2.

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

5.0 SUMMARY OF RESULTS (Continued)

TABLE 5-2
GENERAL RESULTS
VRSD- Coastal Flares
Flare #2
November 16, 2006

Parameter	INLET				EXHAUST			
	First Run	Second Run	Third Run	Average	First Run	Second Run	Third Run	Average
O ₂ , %	7.65	7.57	7.78	7.67	11.31	11.48	11.81	11.53
CO ₂ , %	20.3	20.3	20.0	20.2	8.22	8.06	7.70	7.99
N ₂ , %	43.4	42.9	43.8	43.4	80.5	80.5	80.5	80.5
H ₂ O, %	5.9	7.8	5.7	6.47	8.00	4.73	7.63	6.79
Flow Rate, wscfm	1,484.6	1,487.7	1,477.7	1,483.3	9,976	9,704	9,865	9,849
Flow Rate, dscfm	1,397.0	1,371.7	1,393.5	1387	8,911	9,178	9,246	9,112
Temperature, °F	125.0	125.0	124.0	124.7	1,474	1,454	1,459	1,462
Btu/scf	275	277	272	275				
MMBtu/Hr	24.50	24.73	24.12	24.45				
NO _x :								
ppm					9.26	10.09	9.40	9.58
ppm @ 3% O ₂					17.3	19.2	18.5	18.3
lb/hr (as NO ₂)					0.59	0.66	0.62	0.62
lb/MM Btu (as NO ₂)					0.024	0.027	0.026	0.026
CO: ⁽¹⁾								
ppm					20.0	20.0	20.0	20.0
ppm @ 3% O ₂					37.3	38.0	39.4	38.2
lb/hr					0.775	0.798	0.804	0.792
lb/MM Btu					0.032	0.032	0.033	0.032
Hydrocarbons:								
CH ₄ , ppm	210,000	269,000	268,000	249,000	< 1	< 1	< 1	< 1
Ethane, ppm	7.59	5.92	7.19	6.90	< 1	< 1	< 1	< 1
TGNMIO, ppm (as CH ₄)	660	849	873	794	< 16.8	< 5.86	< 4.21	< 8.96
TGNMIO, lb/hr (as CH ₄)	2.29	2.89	3.02	2.73	< 0.37	< 0.13	< 0.10	< 0.20
TGNMIO, ppm (as hexane)	110.0	141.5	145.5	132.3	< 2.80	< 0.98	< 0.70	< 1.49
TGNMIO, ppm @ 3% O ₂ (as hexane)	148.6	190.0	198.5	179.0	< 5.22	< 1.86	< 1.38	< 2.82
TGNMIO, lb/hr (as hexane)	2.05	2.59	2.71	2.45	< 0.33	< 0.12	< 0.09	< 0.18
Destruction Eff. %					> 83.76	> 95.38	> 96.46	> 91.87
Sulfur Compounds:								
H ₂ S, ppm	4.00	3.18	3.04	3.41				
Carbonyl Sulfide, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Methyl Mercaptan, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Ethyl Mercaptan, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Dimethyl Sulfide, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Carbon Disulfide, ppm	< 0.1	< 0.1	< 0.1	< 0.1				
Isopropyl mercaptan, ppm	< 0.1	< 0.1	< 0.1	< 0.1				
n-propyl mercaptan, ppm	< 0.1	< 0.1	< 0.1	< 0.1				
Dimethyl Disulfide, ppm	< 0.1	< 0.1	< 0.1	< 0.1				
Total Sulfur Compounds,								
Total Reduced Sulfur Inlet, ppm	4.00	3.18	3.04	3.41				
SO _x Exhaust, lb/hr (as SO ₂)					0.056	0.043	0.042	0.047

The exhaust volume flow values are based on EPA Method 19.

⁽¹⁾ CO ppm values were set to 10% of the selected range (0-200 ppm).

5.0 SUMMARY OF RESULTS

TABLE 5-1
SUMMARY OF TEST RESULTS
VRSD- Coastal Flares
Flare #2
November 16, 2006

PARAMETER	INLET	EXHAUST	PERMIT LIMIT
O ₂ , %	7.67	11.53	
CO ₂ , %	20.20	7.99	
N ₂ , %	43.35	80.47	
H ₂ O, %	6.47	6.79	
Flow Rate, wscfm	1483.3	9,849	
Flow Rate, dscfm	1387.4	9,112	<1,500 Inlet
Temperature, °F	125	1,462.2	1400
Btu/scf	274.7		
MMBtu/Hr	24.45		
NO _x :			
ppm		9.6	
ppm @ 3% O ₂		18.3	
lb/hr (as NO ₂)		0.62	2.43
lb/day (as NO ₂)		15.0	
lb/MMBtu (as NO ₂)		0.026	0.06 Rule 74.17.1
lb/MMCF (as NO ₂)		7.49	
CO: ⁽¹⁾			
ppm		20.0	
ppm @ 3% O ₂		38.2	
lb/hr		0.79	8.10
lb/day		19.0	
lb/MMBtu		0.032	0.2 Rule 74.17.1
lb/MMCF		9.51	
Hydrocarbons:			
CH ₄ , ppm	249,000	< 1.00	
TGNMO, ppm (as CH ₄)	794	< 8.96	
TGNMO, lb/hr (as CH ₄)	2.7	< 0.20	1.59
TGNMO, lb/MM Btu (as CH ₄)	-	< 0.008	
TGNMO, lb/day (as CH ₄)	65.6	< 4.82	
TGNMO, ppm (as hexane)		< 1.49	
TGNMO, ppm @ 3% O ₂ (as hexane)		< 2.82	20
TGNMO, lb/hr (as hexane)		< 0.18	
Destruction Eff. %		> 91.87	
lb/MMCF		< 2.16	
Total Sulfur Compounds,			
Total Reduced Sulfur Inlet, ppm	3.41		
SO _x Exhaust, lb/hr (as SO ₂) ⁽¹⁾		0.05	0.41
SO _x Exhaust, lb/day (as SO ₂) ⁽¹⁾		1.13	
lb/MMCF		0.56	

Notes:

The results in this table are the averages of all measurements.

⁽¹⁾ CO ppm values were set to 10% of the selected range (0-200 ppm).

VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT

Memorandum

TO: Interested Parties

DATE: December 8, 1997

FROM: John Harader

SUBJECT: Rule 52 / AP-42 Emission Factor Comparison

District Rule 52, "Particulate Matter - Concentration (Grain Loading)", limits the concentration (or grain loading) of particulate matter. As shown on the attached copy of Rule 52, the limit is in units of Grains per Cubic Foot of Dry Gas at Standard Conditions and varies with the volume discharged (exhaust) in units of cubic feet per minute calculated at standard conditions.

In order to compare the Rule 52 emission limits to EPA AP-42 emission factors for combustion equipment, the exhaust flow rates (dcfm) listed in the rule can be converted to the fuel input rate or the horsepower input. Also the emission concentration limit of grains per dcf can be converted to pounds particulate matter emitted per fuel throughput. The attached tables (Nos. 1 - 4) state the assumptions and equations used in the conversion of the Rule 52 table. Standard F-factors (as found in 40 CFR, Part 60, Appendix A, Method 19) and Higher Heating Values were used. Typical stack oxygen percentages of three percent for external combustion, fifteen percent for diesel engines and lean burn natural gas engines, and one percent for rich burn natural gas engines were used in the conversion equations. The comparison has been done for boilers and process heaters fired on natural gas (Table 1) and Fuel Oil (Table 3) and engines fired on natural gas (Table 2) and diesel (Table 4).

For each table, the first set of columns shows the conversion of the Rule 52 exhaust flow rates (dcfm) to fuel input rates (MMBTU/Hr) for the external combustion units or the equivalent horsepower input for the engines. The second set of columns shows the conversion of the grains per dscf concentration limit to a pounds particulate matter per fuel throughput limit. The third set of columns lists the EPA AP-42 emission factors and asks if the AP-42 emission factor is less than the emission factor generated from Rule 52.

The EPA AP-42 emission factors are less than the emission limits imposed by Rule 52 for all fuel input rates of boilers and process heaters on either natural gas or fuel oil; for all rich burn natural gas engines; for lean burn engines up to 387,590 BHP; and for diesel engines up to 146,970 BHP. Natural gas engines greater than 387,590 BHP and Diesel engines greater than 146,970 BHP are uncommon; and the District does not have any engines of these sizes on permit. Therefore, the EPA AP-42 particulate matter

emission factors, which are used for District Permitted Emission calculations, are less than the limits imposed by Rule 52 for boilers, process heaters, and engines. Rule 52 does not apply to steam generators or gas turbines.

m:\titlev\rule52comp

SO_x RULE COMPARISON FOR COMBUSTION OF LIQUID FUELS

RULE 54.B.1

SO_x EXHAUST ≤ 300 ppm CALCULATED AT SO₂

DIESEL FUEL, 15% O₂

$$\left(\frac{9220 \text{ DSC-F}}{\text{MMBTU}}\right) \left(\frac{64 \text{ lb SO}_2}{\text{lb mole}}\right) \left(\frac{\text{lb mole}}{387 \text{ CF}}\right) \left(\frac{20.9}{20.9-15}\right) \left(\frac{300 \text{ ppm}}{10^6}\right) \left(\frac{141 \text{ MMBTU}}{\text{MGAL}}\right) = \boxed{228.5 \frac{\text{lb SO}_2}{\text{MGAL}}}$$

$$\text{@ } 32\% \text{ O}_2 = \boxed{75.3 \frac{\text{lb SO}_2}{\text{MGAL}}}$$

RULE 64.B.2

SOLID OR LIQUID FUEL SHALL NOT EXCEED
A SULFUR CONTENT OF 0.5 PERCENT, BY WT.



FUEL OIL DENSITY ⇒ 7.2 lb/gal

$$\left(\frac{7.2 \text{ lb FUEL}}{\text{GAL}}\right) \left(\frac{0.5 \text{ lbs}}{100 \text{ lb FUEL}}\right) \left(\frac{\text{mole S}}{32 \text{ lbs}}\right) \left(\frac{\text{mole SO}_2}{\text{mole S}}\right) \left(\frac{64 \text{ lb SO}_2}{\text{mole SO}_2}\right) \left(\frac{1000 \text{ GAL}}{\text{MGAL}}\right) = \boxed{72.0 \frac{\text{lb SO}_2}{\text{MGAL}}}$$

TU: Keith

FROM: Kerby Z.

RE: Rule 54.B.2

Keith,

The Title V "Attachment 54.B.2" was not necessarily intended to require full scale modeling to demonstrate compliance. We did distribute the attached memo "Rule 54.B.2 Compliance" dated May 23, 1996 to help out permit holders.

Except for someone like Pacific Custom Materials, this applies ~~only~~ to combustion equipment like engines, boilers, and turbines. At a bare minimum, they should be able to have the sulfur content of the fuel available; and some material balance calculations or source test info showing ppmv in exhaust stack.

Gas fired equipment burning PVC gas should not be a problem. For diesel fired equipment, info like stack height and property line info should be available to compare to District memo.

See me to discuss further,

Tuks,
Kerby Z.

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

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Condition 57.1	Description: Rule 57.1, Particulate Matter Emissions From Fuel Burning Equipment.
---	---

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

1. Please indicate the method(s) that you use for determining compliance. Indicate the frequency of monitoring and indicate the source test reference method, if applicable. Particulate matter shall not exceed 0.12 pounds per MMBTU of fuel input.

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.

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if this compliance determination method is continuous or intermittent:
 Continuous - As indicated by a continuous monitoring device
 Intermittent - As indicated by non-continuous periodic monitoring
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment
FormTVPF46/12-24-98 Page 2 of 2

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/07 to 12/31/07

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

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Condition 64.B.1	Description: Rule 64.B.1
---	--------------------------

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

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

Bi-annual source monitoring – see attached source test of 11/16/06.

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

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

Continuous - As indicated by a continuous monitoring device

Intermittent - As indicated by non-continuous periodic monitoring

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

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

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

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/07 to 12/31/07

5.0 SUMMARY OF RESULTS (Continued)

TABLE 5-2
GENERAL RESULTS
VRSD- Constal Flares
Flare #2
November 16, 2006

Parameter	INLET				EXHAUST			
	First Run	Second Run	Third Run	Average	First Run	Second Run	Third Run	Average
O ₂ , %	7.65	7.57	7.78	7.67	11.31	11.48	11.81	11.53
CO ₂ , %	20.3	20.3	20.0	20.2	8.22	8.06	7.70	7.99
N ₂ , %	43.4	42.9	43.8	43.4	80.5	80.5	80.5	80.5
H ₂ O, %	5.9	7.8	5.7	6.47	8.00	4.73	7.63	6.79
Flow Rate, wscfm	1,484.6	1,487.7	1,477.7	1,483.3	9,976	9,704	9,865	9,849
Flow Rate, dscfm	1,397.0	1,371.7	1,393.5	1387	8,911	9,178	9,246	9,112
Temperature, °F	125.0	125.0	124.0	124.7	1,474	1,454	1,459	1,462
Btu/scf	275	277	272	275				
MMBtu/Hr	24.50	24.73	24.12	24.45				
NO _x :								
ppm					9.26	10.09	9.40	9.38
ppm @ 3% O ₂					17.3	19.2	18.5	18.3
lb/hr (as NO ₂)					0.59	0.66	0.62	0.62
lb/MM Btu (as NO ₂)					0.024	0.027	0.026	0.026
CO: ⁽¹⁾								
ppm					20.0	20.0	20.0	20.0
ppm @ 3% O ₂					37.3	38.0	39.4	38.2
lb/hr					0.775	0.798	0.804	0.792
lb/MM Btu					0.032	0.032	0.033	0.032
Hydrocarbons:								
CH ₄ , ppm	210,000	269,000	268,000	249,000	< 1	< 1	< 1	< 1
Ethane, ppm	7.59	5.92	7.19	6.90	< 1	< 1	< 1	< 1
TGNMO, ppm (as CH ₄)	660	849	873	794	< 16.8	< 5.86	< 4.21	< 8.96
TGNMO, lb/hr (as CH ₄)	2.29	2.89	3.02	2.73	< 0.37	< 0.13	< 0.10	< 0.20
TGNMO, ppm (as hexane)	110.0	141.5	145.5	132.3	< 2.80	< 0.98	< 0.70	< 1.49
TGNMO, ppm @ 3% O ₂ (as hexane)	148.6	190.0	198.5	179.0	< 5.22	< 1.86	< 1.38	< 2.82
TGNMO, lb/hr (as hexane)	2.05	2.59	2.71	2.45	< 0.33	< 0.12	< 0.09	< 0.18
Destruction Eff. %					> 83.76	> 95.38	> 96.46	> 91.87
Sulfur Compounds:								
H ₂ S, ppm	4.00	3.18	3.04	3.41				
Carbonyl Sulfide, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Methyl Mercaptan, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Ethyl Mercaptan, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Dimethyl Sulfide, ppm	< 0.2	< 0.2	< 0.2	< 0.2				
Carbon Disulfide, ppm	< 0.1	< 0.1	< 0.1	< 0.1				
Isopropyl mercaptan, ppm	< 0.1	< 0.1	< 0.1	< 0.1				
n-propyl mercaptan, ppm	< 0.1	< 0.1	< 0.1	< 0.1				
Dimethyl Disulfide, ppm	< 0.1	< 0.1	< 0.1	< 0.1				
Total Sulfur Compounds,								
Total Reduced Sulfur Inlet, ppm	4.00	3.18	3.04	3.41				
SO _x Exhaust, lb/hr (as SO ₂)					0.056	0.043	0.042	0.047

The exhaust volume flow values are based on EPA Method 19.

⁽¹⁾ CO ppm values were set to 10% of the selected range (0-200 ppm).

5.0 SUMMARY OF RESULTS

TABLE 5-1
SUMMARY OF TEST RESULTS
VRSD- Coastal Flares
Flare #2
November 16, 2006

PARAMETER	INLET	EXHAUST	PERMIT LIMIT
O ₂ , %	7.67	11.53	
CO ₂ , %	20.20	7.99	
N ₂ , %	43.35	80.47	
H ₂ O, %	6.47	6.79	
Flow Rate, wscfm	1483.3	9,849	
Flow Rate, dscfm	1387.4	9,112	<1,500 Inlet
Temperature, °F	125	1,462.2	1400
Btu/scf	274.7		
MMBtu/Hr	24.45		
NO _x :			
ppm		9.6	
ppm @ 3% O ₂		18.3	
lb/hr (as NO ₂)		0.62	2.43
lb/day (as NO ₂)		15.0	
lb/MMBtu (as NO ₂)		0.026	0.06 Rule 74.17.1
lb/MMCF (as NO ₂)		7.49	
CO: ⁽¹⁾			
ppm		20.0	
ppm @ 3% O ₂		38.2	
lb/hr		0.79	8.10
lb/day		19.0	
lb/MMBtu		0.032	0.2 Rule 74.17.1
lb/MMCF		9.51	
Hydrocarbons:			
CH ₄ , ppm	249,000	< 1.00	
TGNMO, ppm (as CH ₄)	794	< 8.96	
TGNMO, lb/hr (as CH ₄)	2.7	< 0.20	1.59
TGNMO, lb/MM Btu (as CH ₄)	-	< 0.008	
TGNMO, lb/day (as CH ₄)	65.6	< 4.82	
TGNMO, ppm (as hexane)		< 1.49	
TGNMO, ppm @ 3% O ₂ (as hexane)		< 2.82	20
TGNMO, lb/hr (as hexane)		< 0.18	
Destruction Eff. %		> 91.87	
lb/MMCF		< 2.16	
Total Sulfur Compounds,			
Total Reduced Sulfur Inlet, ppm	3.41		
SO _x Exhaust, lb/hr (as SO ₂) ⁽¹⁾		0.05	0.41
SO _x Exhaust, lb/day (as SO ₂) ⁽¹⁾		1.13	
lb/MMCF		0.56	

Notes:

The results in this table are the averages of all measurements.

⁽¹⁾ CO ppm values were set to 10% of the selected range (0-200 ppm).

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

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Condition 64.B.2	Description: Rule 64.B.2, Fuel Supplier's Certification
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

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

Only California ARB certified fuels, gasoline and Diesel, with a sulfur content of less than 0.5% are consumed. Fuel supplier's certification is supplied by the fuel manufacturer.

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

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

Continuous - As indicated by a continuous monitoring device

Intermittent - As indicated by non-continuous periodic monitoring

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

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

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment
FormTVPF46/12-24-98 Page 2 of 2

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

See attached fuel standards for supplied gasoline and diesel.

Time Period Covered by Compliance Certification:

01/01/07 to 12/31/07

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

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Condition 74.6	Description: Rule 74.6 - Surface cleaning and Degreasing.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

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

Only minor maintenance cleaning activities using solvents, which are purchased in and applied from manufacture – distributor labeled containers, of one liter or less in volume are used. Less than 5 pounds of solvent was used in 2007.

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

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

Continuous - As indicated by a continuous monitoring device

Intermittent - As indicated by non-continuous periodic monitoring

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

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

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

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/07 to 12/31/07

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

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Condition 74.11.1	Description: Rule 74.11.1, Large Water Heaters and Small Boilers.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

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

At this time there are no Large Water Heaters or Small Boilers at this location that fall under this rule.

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

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

Continuous - As indicated by a continuous monitoring device

Intermittent - As indicated by non-continuous periodic monitoring

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

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

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

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/07 to 12/31/07

Ventura County Air Pollution Control District COMPLIANCE
CERTIFICATION PERMIT FORM

Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/12-24-98 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number
and/or Permit Condition Number:

Condition 74.22

Description: Rule 74.22, Natural Gas-Fired Fan –Type Furnaces

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

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

At this time there are no Natural Gas-Fired Fan-Type Furnaces at this location that fall under this rule.

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

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

Continuous - As indicated by a continuous monitoring device

Intermittent - As indicated by non-continuous periodic monitoring

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

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

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment
FormTVPF46/12-24-98 Page 2 of 2

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/07 to 12/31/07

4Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment
Form TVPF46/12-24-98 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Rule 74.1	Description: Rule 74.1 - Abrasive Blasting.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

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

No abrasive blasting was conducted in 2007.

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

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

Continuous - As indicated by a continuous monitoring device

Intermittent - As indicated by non-continuous periodic monitoring

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

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

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

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/07 to 12/31/07

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

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Condition 74.2	Description: Rule 74.2 - Architectural Coatings.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

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

Only coatings that are in compliance with rule 74.2 are used at this site.

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

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

Continuous - As indicated by a continuous monitoring device

Intermittent - As indicated by non-continuous periodic monitoring

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

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

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

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/07 to 12/31/07

4Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
 Applicable Requirement or Part 70 Permit Condition Attachment
 Form TVPF46/12-24-98 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Condition 74.4.D	Description: Rule 74.4.D - Cut Back Asphalt.
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

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

Road oils were not applied during 2007.

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

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

Continuous - As indicated by a continuous monitoring device

Intermittent - As indicated by non-continuous periodic monitoring

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

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

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment
FormTVPF46/12-24-98 Page 2 of 2

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/07 to 12/31/07

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

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Condition 74.28	Description: Rule 74.28 - Asphalt Roofing operations
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

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

Asphalt roofing operations were not conducted during 2007.

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if this compliance determination method is continuous or intermittent:
 - Continuous - As indicated by a continuous monitoring device
 - Intermittent - As indicated by non-continuous periodic monitoring
4. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as "a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring."
5. Yes No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as "a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring."

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
Applicable Requirement or Part 70 Permit Condition Attachment
FormTVPF46/12-24-98 Page 2 of 2

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/07 to 12/31/07

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

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Condition 74.29	Description: Rule 74.29 - Soil Decontamination Operations.
--	--

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

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

Soil decontamination operations were not conducted during 2007.

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

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

Continuous - As indicated by a continuous monitoring device

Intermittent - As indicated by non-continuous periodic monitoring

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

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

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

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/07 to 12/31/07

Ventura County Air Pollution Control District COMPLIANCE
CERTIFICATION PERMIT FORM

Applicable Requirement or Part 70 Permit Condition Attachment

Form TVPF46/12-24-98 Page 1 of 2

Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: 40CFR Part 61, Subpart M	Description: 40CFR.61.M - Part 61.145 National Emission Standard for Asbestos
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

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

Renovation or demolition of asbestos containing materials was not conducted during 2007.

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

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

Continuous - As indicated by a continuous monitoring device

Intermittent - As indicated by non-continuous periodic monitoring

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

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

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

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/07 to 12/31/07