



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

February 13, 2009

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

Subject: 2008 Reporting Year Part 70 Compliance Certification

Mr. Duval:

Enclosed is The Procter & Gamble Paper Products Company's Oxnard facility, Part 70 Permit No. 00015 Compliance Certification for the January 1, 2008 through December 31, 2008 reporting period.

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

Respectfully,

Mr. Kim Lim  
Site Environmental Leader

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

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Ventura County Air Pollution Control District  
**COMPLIANCE CERTIFICATION PERMIT FORM**

Cover Sheet

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

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

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

**Confidentiality**

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

**Certification by Responsible Official**

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

Signature and Title of Responsible Official:  <u>Vera Ingenhütt</u> Title: Plant Manager Ms. Vera Ingenhütt	Date:  02113109
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Time Period Covered by Compliance Certification (MM/DD/YY):  01/01/08 to 12/31/08
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# **2008 Reporting Year**

## **Annual Title V Compliance Certification**

For

The Procter & Gamble Paper Products Company  
Oxnard, CA Facility

VCAPCD Permit No. 00015

Contact:

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

# Permit Section: 1

Stationary Source Descriptions

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

# Permit Section: 2

Permitted Equipment and Applicable Requirements Table

Compliance Certification Not Applicable –  
Section Lists Equipment and Applicable Requirements

# **Permit Section: 3**

Permitted Throughput and Consumption Limit Table

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

**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number:  <b>Section 3 - Permitted Throughput Limits</b>	Description:  <b>List of Throughput Permit Limits for Emissions Units</b>
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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.

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

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

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

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

01/01/08 to 12/31/08



# Permit Section: 4

Permitted Emissions Table

**Compliance Certification Not Applicable –**

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

# Permit Section: 5

Exempt Equipment List

Compliance Certification Not Applicable –

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

# **Permit Section: 6**

Specific Applicable Requirements (Attachments)

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

Citation, Including Attachment Number and/or Permit Condition Number: <b>Section 6 – Attachment 74.9N7</b> Emergency Standby Stationary Internal Combustion Engines	Description: <b>Condition 1</b> - Engine Emergency or Maintenance Operation <50 hrs/yr <b>Condition 2</b> - Maintain the following records: Hours of operation for calendar year during maintenance operation; Date, time, duration and reason for emergency operation, and engine data.
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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.

<p><b>Condition 1</b> – Fire pump run hours and cause of run time kept in monthly tracking log.</p> <p><b>Condition 2</b> – Monthly tracked hrs for each applicable engine are totaled for annual compliance. Security Guard logs are kept for date, time, duration and reason for emergency operation. Engine data sheets are maintained.</p>
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2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

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

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

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

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

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

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

01/01/08 to 12/31/08

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: <b>Section 6 - 74.15 N.1 (1/1/04)</b> <b>Boilers, Steam Generators, and Process Heaters</b>	Description: <b>Condition 1</b> – Emissions: NOx < 40 ppmvd, CO < 400 ppmvd <b>Condition 2</b> – Source Tested every 24 months using ARB Method 100 <b>Condition 3.a-b:</b> Alternate Fuel Use limitations <b>Condition 4</b> – Startup emissions exemption <b>Condition 5</b> – Recordkeeping: Alternate Fuels, Biennial Source test report <b>Condition 6</b> – Flue Gas Recirculation requirements
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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.

**Condition 1 & 2** - Biennial source test conducted on March 25, 2008. See attached TV47 form. CARB Method 100 was used for CO and NOx.  
**Condition 3** – Alternative Fuel not used - Only ARB Natural Gas utilized in 2008.  
**Condition 4** – Instructional Condition. Certification not applicable.  
**Condition 5** – Source Test report furnished to District on May 8, 2008.  
**Condition 6** – Compliance with Section 7, Attachment PO00015PC4 permit requirements.

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

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

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

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

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

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6.  Yes  No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District. **Not Applicable**
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment. **See 2008 - Section 6 - 74.15N1 (1-1-04) - B301 Source Test Data TVPF47**

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

01/01/08 to 12/31/08

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

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

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

Required every 24 months

Test Notification Provided On: 3/11/08

Test Date: 3/25/08

Test Report Submitted On: 5/8/08



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 Applicable Requirement or Part 70 Permit Condition Attachment  
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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number:  <b>Section 6 – Attachment 74.19N1(12/19/03)                  Graphic Arts Operations Without an Emissions Capture and Control System</b>	Description: <b>Condition 1:</b> Only use flexographic inks < 225 g/l <b>Condition 2:</b> Fountain Solution < 80 g/l <b>Condition 3:</b> Cleaning using approved ROC content and composite partial pressure Solvents <b>Condition 4:</b> Usage of Methylene Chloride Prohibited <b>Condition 5.a-d:</b> Use Approved Cleaning Methods <b>Condition 6:</b> Closed Container Storage of Materials with ROC content <b>Condition 7:</b> Proper disposal of ROC Material Waste <b>Condition 8.a-c:</b> Maintain records (monthly) for inks and fountain solution usage <b>Condition 9.a-e:</b> Test Method utilization
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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.

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

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

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

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

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

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

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

01/01/08 to 12/31/08

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

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: <b>Section 6 – Attachment 103N5 (01/01/04)</b> <b>Boiler Capacity Factor</b>	Description: <b>Condition 1</b> – Operate at less than 30% Capacity Factor for CEMs exemption <b>Condition 2</b> – Install CEMs upon request of District <b>Condition 3</b> – Monthly fuel records and annual capacity factor Calculation
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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.

- 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.

<b>Condition 1</b> – Recordkeeping <b>Condition 2</b> – CEMs installation upon request of District <b>Condition 3</b> – Monthly Calculation of Annual Capacity Factor – See attached sheet
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- Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
- Please indicate if compliance during the reporting period was continuous or intermittent:
  - Continuous – All monitoring measurements show compliance with the Part 70 permit condition
  - Intermittent – One or more measurements indicate a failure to meet the Part 70 permit condition
- 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.”
- 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  
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7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District. **Not Applicable**
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment. **Not Applicable**

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

01/01/08 to 12/31/08

Capacity Factor: Babcock & Wilcox Boiler - 2008 12 month rolling  
 The Procter & Gamble Paper Products Company, Title V Permit 00015

Fuel Usage	B301 (MMSCF)
Jan-08	6.10
Feb-08	0.11
Mar-08	0.36
Apr-08	9.31
May-08	5.95
Jun-08	0.07
Jul-08	2.24
Aug-08	0.45
Sep-08	2.46
Oct-08	5.69
Nov-08	0.02
Dec-08	0.16
12 Month Total	32.91

Annual Heat Input (AHI):

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

AHI = Fuel Used in 12 Months (MMscf) \* Higher Heating Value (MMBTU/MMscf)  
 AHI = 32.91117 \* 1050  
 AHI = 34,557 MMBTU

Maximum Potential Heat Input (MPHI)

Capacity Factor (CF)

Rated Firing Capacity (RFC): 100 MMBTU/hr

Capacity Factor = Ratio of Annual Actual Heat Input to Maximum Potential Heat Input

Maximum Potential Operating Hours (MPOH): 8784 hrs

CF = AHI / MPHI

MPHI = RFC \* MPOH

CF = 0.039340538 Ratio

MPHI = 878,400 MMBTU

% CF = 3.9% (%CF)

30% of MPHI (Maximum Allowable): 263,520 MMBTU

Maximum Allowable Rolling 12 month Fuel Usage: 250.97 MMSCF

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number:	<b>Section 6 – Attachment STRMLN15LM6000-NOx-rev291 LM6000 Gas Turbine Based Cogeneration Unit</b>
<p><b>Description:</b></p> <p>Condition 1: NOx &lt; 2.5 ppmvd avg. @ 15% O2 over 3 hr. period, Annual Source Test, and CEMs</p> <p>Condition 2: ROC &lt;2.0 ppmvd @ 15% O2 average over 3 consecutive hrs. Operate Oxidation Catalyst &amp; test annually.</p> <p>Condition 3: Emissions Exemption: 12 hr cold startup, 3 hr normal-startup, 2 hr unplanned load changes, and 1 hr shutdown</p> <p>Condition 4: Outlet Ammonia &lt; 20 ppmvd verified annually via source test</p> <p>Condition 5.a-f: Source Test Annually at normal operating load. Test Notification and protocol submitted 15 days in advance with report submitted within 45 days of test to include permit specified parameters</p> <p>Condition 6: PM &lt; 3.08 lbs/MMscf &amp; source test using method five upon District request</p> <p>Condition 7.a-l: Operate and maintain CEMs &amp; record permit specified data</p> <p>Condition 8.a-c: CEMs calibration and maintenance per 40 CFR, part 51, Appendix P, Sections 3.0 through 3.9.5</p> <p>Condition 9: Written Notification of monitored emission standards violations within 96 hours</p> <p>Condition 10.a-d: Permanent CEMs records, to include permit specified data</p> <p>Condition 11: Upon request submit CEMs data to District</p> <p>Condition 12: CEMs data reduced per 40 CFR, part 51, appendix P, paragraphs 5.0 – 5.3.3</p> <p>Condition 13: Records maintained per permit conditions</p> <p>Condition 14.a-b: Turbine Operating hours report &amp; annual source test report</p>	

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

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

<p><b>Condition 1, 2, 4 and 5</b> – Annual source test conducted on March 3-4, 2008 Test Methods: NOx - EPA Method 20; CO - ARB Method 100; ROC - EPA Method 18; O2 - ARB Method 100; Fuel HV – ASTM Method D 3588-91*; NH3 - BAAQMD Method ST-1B. See TVPF 47. * Note: Method ASTM Method D 1826-88 is no longer performed by laboratory ASTM Method D 3588-91 is equivalent.</p> <p><b>Condition 2, 7, 10, 11, 13</b> – Recordkeeping</p> <p><b>Condition 3</b> – Exemptions applied as encountered during calendar year</p> <p><b>Condition 5</b> – Utilize certified Source Test vendors, use specified test methods, and submit documentation per deadline requirements</p> <p><b>Condition 6</b> – Conduct source test for PM emissions using EPA Method 5 upon District Request</p> <p><b>Condition 8</b> - Maintenance via operators with assistance from CEM manufacturer</p> <p><b>Condition 9</b> – Operational procedures ensure compliance with 96 hour reporting requirement</p> <p><b>Condition 12</b> – Data Acquisition System data reduction and recordkeeping per specification</p> <p><b>Condition 14</b> – Turbine report submitted semi-annually, source test submitted annually</p> <p>* Permit requires Test Method ASTM D2166-88. Approved Test Plan specified use of, equivalent method ASTM D3588-91, current industry standard for fuel HHV evaluation.</p>
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2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

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

Continuous - All monitoring measurements show compliance with the Part 70 permit condition

Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition – **See response to question #4**

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

**See attached “2008 – Section 6 – LM6000 CEMS Malfunction Summary”**

5.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.” **See attached “2008 – Section 6 – LM6000 Non-Exempt Excess Emissions”**

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8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment. **See attached TVPF47**

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

01/01/08 to 12/31/08

Ventura County Air Pollution Control District  
**COMPLIANCE CERTIFICATION PERMIT FORM**

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

Emission Unit Description: <b>LM6000 turbine</b>		Pollutant: <b>NOx</b>
Measured Emission Rate: <b>1.78 ppm @ 15% O<sub>2</sub></b>	Limited Emission Rate: <b>2.5 ppm @ 15% O<sub>2</sub></b>	Specific Source Test or Monitoring Record Citation: <b>Horizon</b> <b>Test #: P27-028-FR COMP</b> Test Date: <b>March 3-4, 2008</b>

Emission Unit Description: <b>LM6000 turbine</b>		Pollutant: <b>CO</b>
Measured Emission Rate: <b>10.49 lbs/MMscf</b>	Limited Emission Rate: <b>14.11 lbs/MMscf</b>	Specific Source Test or Monitoring Record Citation: <b>Horizon</b> <b>Test #: P27-028-FR COMP</b> Test Date: <b>March 3-4, 2008</b>

Emission Unit Description: <b>LM6000 turbine</b>		Pollutant: <b>O<sub>2</sub></b>
Measured Emission Rate: <b>15.05%</b>	Limited Emission Rate: <b>N/A</b>	Specific Source Test or Monitoring Record Citation: <b>Horizon</b> <b>Test #: P27-028-FR COMP</b> Test Date: <b>March 3-4, 2008</b>

Emission Unit Description: <b>LM6000 turbine</b>		Pollutant: <b>ROC</b>
Measured Emission Rate: <b>&lt;0.5 ppm @ 15% O<sub>2</sub></b>	Limited Emission Rate: <b>2 ppm @ 15% O<sub>2</sub></b>	Specific Source Test or Monitoring Record Citation: <b>Horizon</b> <b>Test #: P27-028-FR COMP</b> Test Date: <b>March 3-4, 2008</b>

Emission Unit Description: <b>LM6000 turbine</b>		Pollutant: <b>Fuel HHV</b>
Measured Emission Rate: <b>418.4 MMBTU/hr</b>	Limited Emission Rate: <b>N/A</b>	Specific Source Test or Monitoring Record Citation: <b>Horizon</b> <b>Test #: P27-028-FR COMP</b> Test Date: <b>March 3-4, 2008</b>

Emission Unit Description: <b>LM6000 turbine</b>		Pollutant: <b>NH<sub>3</sub></b>
Measured Emission Rate: <b>0.34 ppm @ 15% O<sub>2</sub></b>	Limited Emission Rate: <b>20 ppm @ 15% O<sub>2</sub></b>	Specific Source Test or Monitoring Record Citation: <b>Horizon</b> <b>Test #: P27-028-FR COMP</b> Test Date: <b>March 3-4, 2008</b>

LM6000 emissions' testing is required every 12 months.

Test Notification Provided On: 2/08/08

Test Date: 3/3/08

Test Report Submitted On: 4/18/08



## Summary of LM6000 CEMS Malfunction 2008

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

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### During the 2008 calendar year our LM6000 Turbine unit had the following Malfunctions.

The LM6000 turbine CMS system experienced brief periods of malfunction time on 3/10/08, 3/12/08, and 3/17/08. All Malfunction time was reported on the JFM CEMS Quarterly Report, submitted on 4/18/08

The following is an excerpt from that report:

The Continuous Monitoring System (CMS) was sporadically down for repairs/upgrades following a time change event on 3/10 between 08:00-09:00. As a result, process parameter data is missing for the following hours:

<u>03/10</u>	<u>3/12</u>	<u>3/17</u>
09:00-10:00	08:00-09:00	09:00-10:00
10:00-11:00	15:00-16:00	
12:00-13:00		
13:00-14:00		
14:00-15:00		
15:00-16:00		
16:00-17:00		

CEMS strip-charts were functioning normally and are available to demonstrate compliance with the permissible emission limits for NOx and CO during the periods in which CMS data is not available. Additionally, there was representative data collected during both hours noted on 3/12; CMS records exist between 08:40-08:59 and 15:31-15:59.

There were also brief periods of exempt NOx, CO, O2 analyzer malfunction time as reported in Continuous Emissions Monitoring reports submitted: AMJ '08 on 7/21/08, JAS '08 on 10/30/08, and OND'08 on 1/30/09.

## **Summary of LM6000 CEMS Non - Exempt Excess Emissions 2008**

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

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**During the 2008 calendar year our LM6000 Turbine unit had the following Non Exempt Emissions.**

On 2/13/08 the LM6000 had two hours of non-exempt excess NOx emissions which did not result in an exceedance of the turbine's permitted 3-hour emissions limit. These non exempt excess emissions were previously reported in a CEMS Quarterly Report.

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number:	Section 6 – Attachment STRMLN15LM2500-NOx,CO-rev281 <b>GE LM-2500 Gas Turbine Based Cogeneration Unit                  NOx and CO Applicable Requirements</b>
Description: Condition 1 – 3 Hour NOx average < 24 ppmvd @ 15% O <sub>2</sub> while burning Natural Gas Condition 2 – Emissions Exemption: 1 hr for startup & shutdown Condition 3 – Source Test Annually at normal operating load. Test Notification and protocol submitted 15 days in advance with report submitted 45 days after test to include permit specified parameters Condition 4 – Operate and maintain CEMs & record permit specified data Condition 5 – CEMs calibration and maintenance per 40 CFR, part 51, Appendix P, Sections 3.0 through 3.9.5 Condition 6 – Written Notification of emissions violations within 96 hours Condition 7 – Permanent CEMs records, to include permit specified data Condition 8 – Upon request submit CEMs data to District Condition 9 – CEMs data reduced per 40 CFR, part 51, appendix P, paragraphs 5.0 – 5.3.3 Condition 10 – Records maintained per permit conditions Condition 11 – Turbine Operating hours report & annual source test report	

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

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

<p><b>Condition 1, 3</b> – Annual source test conducted on 5/29/08. Protocol submitted 15 days prior and Results submitted 45 days after the source test. Test Methods – NOx: EPA Method 20, O<sub>2</sub>: ARB Method 100, CO: ARB Method 100, Fuel HHV: ASTM D3588-91*.  <b>Condition 1, 2, 4, 7, 8, 9, 10</b> – Recordkeeping  <b>Condition 5</b> – Maintenance via operators with assistance from CEMs manufacturer  <b>Condition 6</b> – Operational procedures ensure compliance with 96 hour reporting requirement  <b>Condition 11</b> – Turbine report submitted semi-annually, source test submitted annually                  * Permit requires Test Method ASTM D2166-88. Approved Test Plan specified use of, equivalent method ASTM D3588-91, current industry standard for fuel HHV evaluation.</p>
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2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

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

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

**See response to question #4**

4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.” **See attached Summary of LM2500 Permit Condition and Summary of LM2500 CEMS Malfunctions**

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

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6.  Yes  No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District. **See attached Summary of LM2500 Permit Condition**
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment. **See attached TVPF47**

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

01/01/08 to 12/31/08

## **Summary of LM2500 Permit Condition 2008**

**Additional Information for TVPF46 form: Section 6 - Attachment STRMLN15LM2500-NOx,CO-rev281**

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**During the 2008 calendar year our LM2500 Turbine unit had the following condition.**

Source Test results were submitted to the District after the required date.

## **Summary of LM2500 CEMS Malfunctions 2008**

**Additional Information for TVPF46 form: Section 6 - Attachment STRMLN15LM2500-NOx,CO-rev281**

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**During the 2008 calendar year our LM2500 Turbine unit had the following Malfunctions.**

There were brief periods of NO<sub>x</sub>, CO, O<sub>2</sub> analyzer calibration malfunction time, as reported in Continuous Emissions Monitoring reports submitted: AMJ '08 on 7/21/08 and JAS '08 on 10/30/08.

Ventura County Air Pollution Control District  
**COMPLIANCE CERTIFICATION PERMIT FORM**

Quantifiable Applicable Requirement for Part 70 Permit **Section 6 - Attachment STRMLN15LM2500-NOx,CO-rev281**

Form TVPF47/12-21-98

Emission Unit Description: <b>LM2500 turbine</b>		Pollutant: <b>NOx</b>
Measured Emission Rate: <b>22.4 ppm @ 15% O2</b>	Limited Emission Rate: <b>24 ppm @ 15% O2</b>	Specific Source Test or Monitoring Record Citation: <b>Horizon Test #: P27-030-FR COMP</b> Test Date: <b>May 29, 2008</b>

Emission Unit Description: <b>LM 2500 turbine</b>		Pollutant: <b>CO</b>
Measured Emission Rate: <b>30.70 pph</b>	Limited Emission Rate: <b>54.98 pph</b>	Specific Source Test or Monitoring Record Citation: <b>Horizon Test #: P27-030-FR COMP</b> Test Date: <b>May 29, 2008</b>

Emission Unit Description: <b>LM2500 turbine</b>		Pollutant: <b>O2</b>
Measured Emission Rate: <b>14.56%</b>	Limited Emission Rate: <b>N/A</b>	Specific Source Test or Monitoring Record Citation: <b>Horizon Test #: P27-030-FR COMP</b> Test Date: <b>May 29, 2008</b>

Emission Unit Description: <b>LM2500 turbine</b>		Pollutant: <b>Heat Rate</b>
Measured Emission Rate: <b>234.2 MMBTU/hr</b>	Limited Emission Rate: <b>N/A</b>	Specific Source Test or Monitoring Record Citation: <b>Horizon Test #: P27-030-FR COMP</b> Test Date: <b>May 29, 2008</b>

LM2500 emissions testing is required every 12 months.

Test Notification Provided On: 5/8/08

Test Date: 5/29/08

Test Report Submitted On: 7/21/08

The dates indicated above are applicable to the RATA; completed concurrent with this Source Test.

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

Citation, Including Attachment Number and/or Permit Condition Number: <b>Section 6 – Attachment STRMLN15-SO<sub>x</sub>-rev291</b>  <b>LM6000 and LM2500 Gas Turbine Based Cogeneration Units SO<sub>x</sub> Applicable Requirements - Streamlined</b>	Description: Condition 1 – Gaseous Fuel < 50 grains sulfur per 100 Cu Ft. of fuel Condition 2 – If use PUC fuels used Rule 64 compliance is assumed Condition 3 – Sulfur content analysis required if not using PUC fuels Condition 4 – Burning fuel with .5% sulfur prohibited Condition 5 – If use ARB Diesel Rule 64 Compliance is assumed Condition 6 – Sulfur content analysis and recordkeeping required if not using ARB Diesel Condition 7 – All emissions must be < 300 ppm SO <sub>2</sub> at discharge Condition 8 – Upon Request source test for SO <sub>2</sub> at discharge points Condition 9 – Max yearly fuel oil usage limitation on LM2500 turbine
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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.

**Condition 1, 2, 3, 4, 7, 9** - Both the LM6000 and LM2500 exclusively used PUC-quality natural gas in 2008.  
**Condition 5, 6, 7, 9** – LM2500 & LM6000 turbines did not use liquid fuel in 2008.  
**Condition 8** – Source Test upon request

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

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

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

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



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

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

01/01/08 to 12/31/08

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**Applicable Requirement or Part 70 Permit Condition**

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

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

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

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

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

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

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

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

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

01/01/08 to 12/31/08

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number:  <b>Section 6 – Attachment ATCM Engine N1          CA ATCM for Stationary Compression Ignition Engines</b>	Description:  Condition 1.a-e: Use specified approved fuels Condition 2: Monthly log of engine hours of operation Conditions 3.a-e: Maintain fuel purchase records
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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.

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

**Condition 1:** Only CARB Red Fuel Oil #2 (Diesel) used for Fire Pump Compression Ignition Engines  
**Condition 2:** Monthly log of Emergency Fire Pump Hours of operation maintained  
**Condition 3:** Required data provided in fuel supplier invoice, and maintained for each delivery

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

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

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

- 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.”

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

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

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

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# **Permit Section: 7**

Permit Specific Conditions (Attachments)

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: <b>Section 7 – Attachment PO0015PC1</b>  <b>Throughput &amp; Consumption Limits</b>	Description:  <b>Condition 1 – Monthly throughput (emissions) records</b> <b>Condition 2 – Solvent purchase and disposal records</b>
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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.

<b>Condition 1 –</b>	Monthly records of emissions specified in Table 3 throughput column are recorded and available upon request.
<b>Condition 2 –</b>	Record of vendor solvent delivery & removal are maintained – Proper disposal verified via hazardous waste manifest recordkeeping

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

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

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

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

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

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

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

01/01/08 to 12/31/08



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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: <b>Section 7 – Attachment PO0015PC2-rev291</b>  <b>Combustion Emissions Units:</b> LM6000, LM2500, B&W Steam Boiler, 1X Hot Air, 1X Yankee Furnace, 2X Furnaces	Description: <b>Condition 1</b> – Facility wide TPY emissions limits for Combustion Units <b>Condition 2</b> – LM6000 Turbine will only be fired on Natural Gas (NG) <b>Condition 3</b> – LM2500 Turbine shall only burn Fuel Oil (FO) when no NG is available. <b>Condition 4</b> – B&W Steam Boiler shall use NG, FO < 50 hrs per yr. <b>Condition 5</b> – 1X Hot Air Furnace shall use, FO < 50 hrs per yr. <b>Condition 6</b> – 1X Yankee Furnace shall use NG or LPG only <b>Condition 7</b> – 2X furnaces shall use only NG <b>Condition 8</b> – Fuel oil sulfur content shall be < 0.05% by weight <b>Condition 9</b> – Maintain records: 12 mo. Rolling average fuel usage and emissions based on factor and CEM units.
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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.

<p><b>Condition 1</b> – Monthly monitoring of emissions records to ensure compliance with facility wide emissions limits.  <b>Condition 2-8:</b> Facility exclusively utilizes Natural Gas to fire all attachment specified combustion units at facility. No Fuel Oil used in 2008.  <b>Condition 9</b> – Monthly records of fuel usage. Emission factors are used for ROC, PM, and SOx. CEMS data is used on the LM6000 &amp; LM2500 to monitor and track CO and NOx emissions.</p>
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2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

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

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

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

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

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

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

01/01/08 to 12/31/08

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number:  <b>Section 7 – Attachment PO0015PC3                  2X Papermachine Hot Air Furnace and                  “Yankee” Hood Furnace Furnaces                  Requirements</b>	Description: <b>Condition 1</b> – NOx < 0.08 lb/MMBTU, CO < 0.045 lb/MMBTU <b>Condition 2</b> – Fuel and air settings locked as specified in permit. Settings recorded every 6 months <b>Condition 3</b> – Source test using ARB Method 100 for NOx, CO and O2. Notification & Test Protocol to District 15 days in advance. Report within 45 after test. <b>Condition 4</b> – Screening Analysis with portable analyzer performed every 24 months
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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.

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

**Condition 1, 3, 4** - Emissions testing of the 40 mmBtu/hr “Yankee Hood” furnace consisted of Source Testing, superior to and equivalent to Analyzer testing was completed on **9/16/08**. The Yankee furnace was in compliance with permit limits. Notifications and results supplied to District as required. 2X Furnace Source Testing TVPF47 is attached.

**Condition 2** – Fuel Linkage setting monitored and recorded every 6 months

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

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

- 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.”

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

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

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

01/01/08 to 12/31/08

PO00015 Ventura County Air Pollution Control District  
**COMPLIANCE CERTIFICATION PERMIT FORM**

Quantifiable Applicable Requirement for Part 70 Permit Section 7 Attachment PO00015PC3

Form TVPF47/12-21-98

Emission Unit Description: <b>2X Yankee "Hood" Furnace (40 mmBTU/hr)</b>		Pollutant: <b>NOx</b>
Measured Emission Rate: <b>0.011 lbs/mmBtu</b>	Limited Emission Rate: <b>0.08 lbs/mmBtu</b>	Specific Source Test or Monitoring Record Citation: <b>Horizon P27-031-FR</b> Test Date: <b>9/16/08</b>

Emission Unit Description: <b>2X Yankee "Hood" Furnace (40 mmBTU/hr)</b>		Pollutant: <b>CO</b>
Measured Emission Rate: <b>0.012 lbs/mmBtu</b>	Limited Emission Rate: <b>0.045 lbs/mmBtu</b>	Specific Source Test or Monitoring Record Citation: <b>Horizon P27-031-FR</b> Test Date: <b>9/16/08</b>

"Yankee Hood" Furnace emissions testing is required every 24 months.

Test Notification provided on: 7/29/08

Test Date on: 9/16/08

Test Report submitted on: 10/30/08

Emission Unit Description: <b>2X Hot Air Furnace (70 mmBTU/hr)</b>		Pollutant: <b>NOx</b>
Measured Emission Rate: <b>0.014lbs/mmBtu</b>	Limited Emission Rate: <b>0.08 lbs/mmBtu</b>	Specific Source Test or Monitoring Record Citation: <b>Horizon P27-025-FR</b> Test Date: <b>9/14/06</b>

Emission Unit Description: <b>2X Hot Air (PreDryer)Furnace (70 mmBTU/hr)</b>		Pollutant: <b>CO</b>
Measured Emission Rate: <b>0.002 lbs/mmBtu</b>	Limited Emission Rate: <b>0.045 lbs/mmBtu</b>	Specific Source Test or Monitoring Record Citation: <b>Horizon P27-025-FR</b> Test Date: <b>9/14/06</b>

Hot Air Furnace emissions testing is required once prior to 12/31/08.

Test Notification for Both Furnaces Provided On: 9/7/06

Test Date: 9/14/06

Test Report Submitted On: 10/26/06

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: <b>Section 7 – Attachment PO0015PC4                  Flue Gas Recirculation (FGR)                  Requirements                  Babcock &amp; Wilcox Steam Boiler</b>	Description:  <b>Condition 1.a-b – FGR system settings locked (physically pinned) in place per permit specifications. Parameters to be monitored, measured, and recorded on monthly basis.</b>
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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.

**Condition 1 – Monthly monitoring of mechanical linkage of fuel and air damper. Linkages are pinned in place.**

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

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

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

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

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

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

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

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number:	<b>Section 7 – Attachment PO0015PC5 Particulate Matter Emission Requirements 1X Paper Machine, 2X Paper Machine, Wet Lapper and Converting Line Rooms</b>
Description: Particulate Matter Emissions Requirements. <b>Condition 1:</b> 1X PM < 6.75 lbs/hr, 2X PM < 3.99 lbs/hr, Wet Lapper < 0.10 <b>Condition 2:</b> Daily average of hourly readings of scrubber pressure drop and liquor flow rate for 1X, 2X and wet lapper scrubbers. <b>Condition 3.a-e:</b> Daily Record not required for less than full day operation. Excursions to be corrected expeditiously, meters and gauges maintained per facility plan, and made available upon request. Excursions require summary of corrective actions. Semi annual report of Excursions. <b>Condition 4.a-b:</b> PM emissions < Rule 52 & 53 table limit <b>Condition 5:</b> Compliance with Rule 52 & 53 achieved with compliance with Condition 1 and 2 <b>Condition 6:</b> Converting room emissions shall be re-circulated back into room	

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

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

<p><b>Condition 1-2, 4-5:</b> 1X, 2X, and Wet Lapper Scrubber operation to ensure Pressure Drop, and Liquor Flow Rate are not less than the permit specified values.</p> <p><b>Condition 3</b> –Records of Hourly and Daily operation kept. Excursion correction and summaries documented. Semi annual report submitted.</p> <p><b>Condition 6</b> – Converting Room emissions are circulated back into room via duct work maintained by plant personnel.</p>
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2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

3. Please indicate if compliance during the reporting period was continuous or intermittent:  
 Continuous - All monitoring measurements show compliance with the Part 70 permit condition  
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition  
**See Response to question #4 below**

4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.” **See Attached Summary of 1X Dry End Excursion 2008**

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



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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered “yes” to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District. **See Attached Summary of 1X Dry End Excursion 2008**
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment. **Not Applicable**

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

01/01/08 to 12/31/08

## **Summary of 1X Dry End Excursion 2008**

**Additional Information for TVPF46 form: Attachment PO0015PC5 Particulate Matter Emission Requirements  
1X Paper Machine, 2X Paper Machine, Wet Lapper and Converting Line Rooms**

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**During the 2008 calendar year our 1X Dry End Venturi Scrubber had the following  
Excursion reported to VCAPCD on 10/17/08:**

Records from 9/10/08 indicate that the differential pressure daily average was 25.63 versus the permitted level of 25.70. There are no indications that PM was exhausted to the atmosphere during this incident.

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: <b>Section 7 – Attachment PO0015PC6</b> <b>ROC Emission Requirements</b> Manufacturing Chemicals for Ink and Additive Applications	Description: <b>Condition 1</b> – Inks and additives facility 12 month rolling average ROC limit <b>Condition 2</b> – Maintain monthly record of ROC emissions for process additives usage
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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.

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

**Condition 1** – Facility ROC emissions rates are recorded and tracked to ensure 12 month rolling totals maintained below 60 TPY  
**Condition 2** – Maintain monthly usage data for ROC containing chemicals

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

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

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

- 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.”

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

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

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

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: <b>Section 7 – Attachment PO0015PC7-rev291                  Federal PSD Permit Requirements                  Cogeneration Turbine (LM-6000), Cogeneration Turbine (LM-2500)                  Babcock &amp; Wilcox Steam Boiler, 1X Paper Machine Hot Air Furnace, and 1X Papermachine “Yankee” Hood Furnace</b>	Description: <b>Condition 1 – If request increase in permitted NOx emissions for combustions sources above 250 TPY, submit PSD application for LM6000 turbine</b>
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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.

**Condition 1 – If request increase in NOx emissions in excess of 250 TPY, will submit PSD application for LM6000 turbine.**

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

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

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

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

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

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

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

01/01/08 to 12/31/08

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: <b>Section 7 – Attachment PO0015PC8          ERC Certificate No. 1166</b>	Description: <b>Condition 1</b> – All motor vehicle parking and traffic on paved surfaces only. No unpaved areas readily accessible by vehicle. Except for emergencies, construction, maintenance and agricultural use.
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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.

**Condition 1** – Access to unpaved areas is restricted. Signs indicating prohibition for parking, and travel over unpaved areas are posted throughout site. Parking and traffic expectations communicated to facility and enforced by facility personnel.

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

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

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

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# **Permit Section: 8**

General Applicable Requirements (Attachments)

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: <b>Section 8 – Attachment Rule 50 Opacity</b>	Description: <b>Condition 1</b> – 3 Minute emissions in hour less than 20% Opacity <b>Condition 2</b> – Routine Surveillance and record of visible emissions <b>Condition 3</b> – Annual compliance certification, including site survey <b>Condition 4</b> – EPA Method 9 survey per District request
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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.

<p><b>Condition 1 &amp; 2</b> – Periodic surveillance of emissions is performed by site personnel.</p> <p><b>Condition 3</b> – Visible emissions survey conducted on July 29, 2008; the survey revealed that the facility had zero percent visible emissions, other than uncombined water.</p> <p><b>Condition 4</b> – Perform survey per District's request</p>
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2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

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

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

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

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

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

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

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: <b>Section 8 – Attachment 52 (10/01/02) Particulate Matter - Concentration</b>	Description: <b>Condition 1</b> – PM emissions less than table in Rule 52 <b>Condition 2</b> – Periodic Monitoring not required. Certify compliance with reference to District Rule 52 analysis
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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.

**Condition 1 & 2** – Compliance demonstration is based on District’s analysis of Rule 52 compliance based on EPA emissions factor analysis.

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

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

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

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

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

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

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

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number:  <b>Section 8 – Attachment 54.B.1 (07/13/00)                  Sulfur Compounds – Sulfur Emissions                  from Combustion Operations at Point of                  Discharge</b>	Description: Condition 1 – Point of Discharge SO2 concentrations < 300 ppmv, from combustion operation Condition 2 – Comply with fuel Sulfur content limits per Rule 64. No monitoring required. Condition 3 – Upon District Request determine point of Discharge concentrations of SO2
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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.

<p><b>Condition 1</b> – Compliance with permit condition Attachment P00015PC2. Only PUC-quality natural gas and CARB approved diesel used on site in 2008.</p> <p><b>Conditions 2</b> – Fuel Oil Sulfur Content provided by supplier at each delivery. Gaseous sulfur content meeting PUC Quality requirements. Data furnished to district upon request.</p> <p><b>Condition 3</b> – Furnish District with data upon request.</p>
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2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

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

Continuous - All monitoring measurements show compliance with the Part 70 permit condition  
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition  
**Natural Gas fuel is supplied by Southern California Gas Company, which conforms to CPUC standards. Liquid Fuel (red #2 diesel) provided by Silvas Oil Company or Dewitt Petroleum which conforms to ARB sulfur content requirements.**

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

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

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

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number:  <b>Section 8 - 54.B.2 Sulfur compounds – SO2 Concentrations.</b>	Description: <b>Condition 1</b> – Property Line SO2 concentrations: 1 hr < 0.25 ppmv, 24 hr < 0.04 ppmv <b>Condition 2</b> – Provide fuel or exhaust analysis to District upon request <b>Condition 3a-c</b> – Upon District Request determine ground level concentrations of SO2
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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.

<p><b>Condition 1</b> - Compliance with permit condition Attachment P00015PC2. Only PUC-quality natural gas, and CARB approved diesel used on site in 2008.</p> <p><b>Conditions 2</b> – Fuel Analysis provided by suppliers at request of facility. Exhaust analysis based on emissions factors incorporated into facility AB2588 Health Risk Assessment. Data furnished to district upon request.</p> <p><b>Condition 3</b> – Furnish District with data upon request.</p>
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2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

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

- Continuous - All monitoring measurements show compliance with the Part 70 permit condition
  - Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition
- Natural Gas fuel is supplied by Southern California Gas Company, which conforms to CPUC standards. Liquid Fuel (red #2 diesel) provided by Silvas Oil Company and Dewitt Petroleum, which conforms to ARB sulfur content requirements. AB2588 update submitted to District on 11/20/07.**

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

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



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

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: <b>Section 8 – Attachment 57.B (10/01/01)</b> <b>Combustion Contaminants – Specific – Fuel Burning Equipment</b>	Description: <b>Condition 1</b> – Combustions contaminants at discharge < 0.1 grain / ft <sup>3</sup> @ 12% CO <sub>2</sub> <b>Condition 2</b> – Periodic Monitoring is not necessary to comply with Rule 57.B. Reference to district analysis and source test is sufficient.
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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.

**Condition 1** – Satisfy Condition 2 requirements below.  
**Condition 2** – Monitoring not required based on district analysis (Per comments in permit, Table 1.C.3)

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

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

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

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

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

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

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: <b>Section 8 – Attachment 57.1 (01/11/05)</b> <b>Particulate Matter Emissions from Fuel Burning Equipment</b>	Description: <b>Condition 1</b> – PM shall not exceed 0.12 lbs/mmBTU <b>Condition 2</b> – Compliance demonstration required upon district request <b>Condition 3</b> – Periodic monitoring not required. Certify compliance by referring to District Rule 57.B analysis dated 12/3/97
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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.

- 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.

<b>Condition 1</b> – Satisfy Conditions 2 & 3 of this attachment. <b>Condition 2</b> – Monitoring not required based on district analysis (Per comments in permit, Table 1.C.3, Condition 57.1) <b>Condition 3</b> – Periodic monitoring not required. Compliance certified via District analysis of Rule 57.B, dated 12/3/97.
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- Yes  No      Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

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

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

- 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.”

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

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

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: <b>Section 8 – Attachment 64.B.1 (04/13/99)</b> <b>Sulfur Content of Fuels – Gaseous Fuel Requirements</b>	Description: <b>Condition 1</b> – Gaseous Fuel sulfur compounds < 788 ppmv <b>Condition 2</b> – Periodic Monitoring not required if using PUC Natural Gas <b>Condition 3</b> – Analyze fuel if using non PUC quality fuel <b>Condition 4a-b</b> – Landfill or oilfield gaseous fuel usage 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.

**Conditions 1-4:** Maintain records showing that only PUC Quality natural gas is used, therefore no other monitoring is required. Facility does not use landfill or oilfield gaseous fuel.

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

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

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

**Supplier Assurance: Southern California Gas Company – Rule 30 Requirements: All Pipeline Natural Gas Conforms to CPUC General Order No. 58A.**

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

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

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

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: <b>Section 8 – Attachment 64.B.2 (04/13/99)</b> <b>Sulfur Content of Fuels – Liquid Fuel Requirements</b>	Description: <b>Condition 1</b> – No liquid Fuel usage with sulfur content > 0.5% by weight <b>Condition 2</b> – If only use ARB quality liquid fuel compliance is assured without monitoring <b>Condition 3</b> – Requirements for use of non ARB liquid fuels
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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.

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

**Conditions 1 & 2** – Maintain records of exclusive use of ARB compliant liquid fuel used on site in 2008 – No other monitoring is required.

**Condition 3** – Monitor per permit requirements if use non ARB quality liquid fuel

- Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
- Please indicate if compliance during the reporting period was continuous or intermittent:
  - Continuous - All monitoring measurements show compliance with the Part 70 permit condition
  - Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition

**Supplier Assurance: Silvas Oil Company Inc and Dewitt Petroleum, – CARB diesel certification provided at each delivery on invoice.**
- 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.”
- Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”



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

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

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: <b>Section 8 – Attachment 68 (10/01/01)</b> <b>Rule 68 Applicable Requirements Carbon Monoxide</b>	Description: <b>Condition 1</b> – CO discharge concentration < 2,000 ppmvd <b>Condition 2</b> – Periodic Monitoring not required – To certify compliance make reference to District rule 68 analysis.
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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.

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

**Condition 1** – See Condition 2 compliance determination method below.  
**Condition 2** – Compliance per District’s analysis of Rule 68 based on EPA emission factors.

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

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

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

- 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.”

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

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

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

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number:	<b>Section 6 &amp; 8 – Attachment 74.6 (2003) Surface Cleaning and Degreasing</b>
Description: <b>Condition 1.a-c:</b> Limitations on use of solvents in surface cleaning. Electronics cleaning solvent < 900 g/l ROC & < 33 mmHg partial pressure. Other cleaning solvents < 25 g/l as applied. <b>Condition 2.a-d:</b> If use solvents > 25 g/l ROC use indicated methods: Wipe cleaning; closed container dispensing of less than 1 liter; flow, dip, or flush with solvent collection; enclosed gun washer. <b>Condition 3:</b> No leaks from solvent containing equipment or containers. <b>Condition 4:</b> No solvents shall be solicited, supplied, sold, or used that would violate Rule 74.6. <b>Condition 5:</b> Use less than one gallon of halogenated solvents per week for cold cleaning. If use maintain records. <b>Condition 6:</b> Solvent stored in non-absorbent containers and closed except for filling or emptying. <b>Condition 7:</b> Dispose of solvents and solvent residues as California Hazardous Waste. <b>Condition 8.a-f:</b> Cold Cleaning equipment requirements, except for non-remote reservoir. <b>Condition 9.a-e:</b> Remote Reservoir equipment requirements. <b>Condition 10.a-g:</b> Cold Cleaner operating requirements. <b>Condition 11.a-h, 12.a-o, 13:</b> Rule 74.6 exemptions. <b>Condition 14.a-d:</b> Solvent Material recordkeeping requirements made available to District upon request. <b>Condition 15:</b> Maintain records and perform routine surveillance of solvent cleaning activities per Conditions 1-14. Upon district Request demonstrate compliance per permit requirements.	

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

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

<b>Conditions 1–4, 6-7:</b>	Compliance for permit conditions pertaining to solvent storage and handling is satisfied via personnel training and observation. Chemical Approval System ensures conformity with solvent ROC content limits.
<b>Condition 5:</b>	Facility does not use halogenated cold cleaner solvents
<b>Conditions 8-10:</b>	Cold cleaners are exempt per section 5 of our permit (Only exempt solutions used).
<b>Condition 11:</b>	Informational only compliance not required
<b>Condition 14:</b>	Recordkeeping per permit requirements.
<b>Condition 15:</b>	Visual surveillance performed routinely. Site uses chemical approval process to confirm that only ROC content acceptable solvents are purchased and used on 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 compliance during the reporting period was continuous or intermittent:  
 Continuous - All monitoring measurements show compliance with the Part 70 permit condition  
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition
4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

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

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: <b>Section 8 – Attachment 74.11.1</b> <b>Rule 74.11.1 Large Water Heaters and Small Boilers</b>	Description: <b>Condition 1.a-b:</b> Requirements for certified NO <sub>x</sub> emissions for 75-400 MBTU/hr heaters and boilers. <b>Condition 2.a-b:</b> Requirements for certified NO <sub>x</sub> emissions for 400-2,000 MBTU/hr heaters and boilers. <b>Condition 3 –</b> Maintain permit specified records for heaters and boilers that are 75-2,000 MBTU/hr <b>Condition 4 –</b> Annual Compliance certification and survey of heaters and boilers that are 75-2,000 MBTU/hr
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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.

**Conditions 1-4:** Facility does not presently utilize Heaters or Boilers that are rated at 75 – 2,000 MBTU/hr, thus facility is not subject to equipment certification, recordkeeping, and annual survey requirements.

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

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

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

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

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

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

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

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: <b>Section 8 – Attachment 74.22                  Natural Gas-Fired Fan-Type Central Furnaces</b>	Description: <b>Condition 1.a-b:</b> New fan type central furnaces require NOx < 40ng per Joule Output <b>Condition 2:</b> Maintain list of fan types with permit specified data <b>Condition 3:</b> Annual survey of fan furnaces
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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.

**Conditions 1–3:** Facility has not previously nor currently operates any Fan-type Central Furnaces on site, thus is not subject to equipment certification, recordkeeping and annual survey requirements.

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

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

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

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

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



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

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

01/01/08 to 12/31/08

# **Permit Section: 9**

General Requirements for Short-Term Activities (Attachments)

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

Citation, Including Attachment Number and/or Permit Condition Number:  <b>Section 9 – Attachment 74.1 (10/01/02)                  Abrasive Blasting</b>	Description: <b>Condition 1.a-c:</b> Abrasive Blasting shall be conducted indoors, using specified methods <b>Condition 2.a-d:</b> For Outdoor blasting use steel or iron shot/grit or must utilize permit specified alternate methods <b>Condition 3 –</b> Adhere to Rule 74.1.B.2 requirements for pavement marking <b>Condition 4 –</b> Stucco and concrete blasting per Rule 74.1.B.3 <b>Condition 5 –</b> Use California approved and labeled materials for abrasive blasting <b>Condition 6 –</b> Comply with visible emissions standard per rule 74.1.C.2 <b>Condition 7.a-e:</b> Routine Surveillance and visual inspection of blasting operations. Surveillance to include permit specified recordkeeping.
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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.

<b>Condition 1 –</b>	Utilize enclosed particulate capture system for indoor abrasive blasting.
<b>Condition 2 –</b>	Use of approved materials and methods for outdoor blasting directed by written instructions.
<b>Conditions 3–4:</b>	Pavement marking, stucco, and concrete not performed on site, however process is in place, via written instructions to adhere to rule 74.1 requirements for abrasive blasting operations.
<b>Condition 5 –</b>	Use of California approved materials verified by site environmental resources.
<b>Condition 6 –</b>	Work process for outdoor blasting conforms to visible emission standards.
<b>Condition 7 –</b>	Records of Abrasive blasting surveillance maintained by Site Facilities Manager and Site Environmental Leader. Indoor blasting conducted in sealed cabinet with filtered exhaust, such that visible emissions are to atmosphere not possible.

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

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

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

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

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

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

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

01/01/08 to 12/31/08

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number:  <b>Section 9 – Attachment 74.2 (01/01/04)                  Architectural Coatings</b>	Description: <b>Condition 1.a-c:</b> VOC Coating content limits, less water and exempt OC's, Flat <100 g/l; Nonflat <150 g/l; Nonflat High Gloss <250 g/l <b>Condition 2</b> – Specialty coatings shall conform with Rule 74.2 Table of Standards. Industrial Maintenance <250 g/l less water & exempt OC's <b>Condition 3</b> – Architectural coatings and cleaning materials to remain closed except when in use. <b>Condition 4</b> – Adhere to Rule 74.2.B.1 thinning requirements <b>Condition 5</b> – Routine Surveillance of architectural coating operations. Maintain VOC data on coatings used, and submit to district upon request <b>Condition 6</b> – VOC content and other properties measured per procedures in Rule 74.2.G
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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.

<p><b>Condition 1, 2</b> – All paints used at facility are reviewed for compliant VOC content prior to approval for use.</p> <p><b>Condition 3</b> – Closure requirements are documented and training provided to all site personnel and contractors.</p> <p><b>Condition 4</b> – Paints are used as supplied by vendor.</p> <p><b>Condition 5</b> – Visual observations occur routinely. VOC data maintained for each coating via vendor supplied MSDS. Data will be furnished to District upon request.</p> <p><b>Condition 6</b> – Architectural coating properties determined using vendor supplied data.</p>
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2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

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

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

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

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

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

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number:  <b>Section 9 – Attachment 74.28          Asphalt Roofing Operations</b>	Description: <b>Condition 1</b> – Kettles shall operate with lids. Lid will not be opened unless temperature is < 150°F <b>Condition 2</b> – Max Temperatures: Asphalt < 500°F, Coal tar pitch < 400°F <b>Condition 3</b> – Lid to remained closed, and receiving containers to be covered <b>Condition 4</b> – Kettle vents to remain closed at all times <b>Condition 5</b> – Facility will verify Rule 74.28 requirements met during
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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.

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

**Conditions 1-5:** Internal administrative procedures. No asphalt roofing operations conducted at facility in 2007.

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

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

- 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.”

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

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

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

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: <b>Section 9 - Attachment 40 CFR 61.M          National Emissions standards for          Asbestos</b>	Description: <b>Condition 1</b> – Comply with 40 CFR part 61, Subpart M <b>Condition 2</b> – Adhere to 40 CFR part 61.145 requirements for Demolition and Renovation.
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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.

<p><b>Condition 1</b> – Site Asbestos abatement program managed consistent with 40 CFR Part 61, Subpart M. State certified contractors are utilized for ACM demolition and renovation. Adherence with 40 CFR Part 61.145 is mandatory for job approval.</p> <p><b>Condition 2</b> – ACM demolition and renovation are observed by site resources to ensure compliance with 40 CFR Part 61.145. Activities involving ACM recorded are filed with Site Environmental Leader. Notification is provided to District prior to ACM renovation or demolition for activities requiring notification.</p>
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2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

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

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

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

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

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

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

01/01/08 to 12/31/08

# **Permit Section: 10**

General Permit Conditions

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number:  <b>Section 10 – District General Part 70 Permit Conditions</b>	Description: <b>Condition 1</b> – Comply with all federally enforceable conditions, and comply with all applicable requirements already in compliance with. <b>Condition 2</b> – Comply with new Requirements in a timely manner <b>Condition 3</b> – Promptly report deviations (within less than 4 hours) <b>Condition 4</b> – The need to halt / reduce activity is not a defense <b>Condition 5</b> – Retain all Records for at least 5 years. <b>Condition 6</b> – All applicable reports submitted to District every 6 months with Responsible Official Certification. <b>Condition 7.a-d:</b> Facilitate permit specified District inspection rights <b>Condition 8</b> – Permit may be modified, revoked, reopened, reissued or terminated for cause <b>Condition 9.a-d:</b> Permit will be reopened per permit specified reasons <b>Condition 10</b> – All fees shall be paid on timely basis <b>Condition 11</b> – Permit does not convey property rights <b>Condition 12</b> – One invalid term / condition does not invalidate the entire permit <b>Condition 13</b> – Renewal application must be submitted between 6 to 18 months prior to expiration <b>Condition 14</b> – Renewal application, and Part 70 requires reports must be certified by a responsible official <b>Condition 15</b> – Annual Compliance 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.

**Condition 1-2, 4, 7-9, 11-13:** Not applicable - Instructional conditions.  
**Condition 3** – Internal administrative procedures.  
**Condition 5** – Electronic databases and hard copy archives used for 5 year data retention  
**Condition 6** – Reports submitted to district via hand delivery or Certified Mail  
**Condition 10** – Internal Administrative procedures. Records of timely fee payment.  
**Condition 14-15:** Internal Administrative procedures.

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if compliance during the reporting period was continuous or intermittent:
  - Continuous - All monitoring measurements show compliance with the Part 70 permit condition
  - Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition –  
**Condition 5: Certain fuel delivery related records for Fire Suppression pumps #4 & #5 are no longer available prior to August 26<sup>th</sup>, 2005. Per Section 6 – ATCM Engine N1 –fuel delivery records for the current year are complete.**  
**Condition 10: Application fee was submitted after the permit renewal application was submitted.**
4.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any excursions, if applicable? An *excursion* is defined as “a departure from an indicator or surrogate parameter range established for monitoring under the applicable requirement or Part 70 permit condition, consistent with any averaging period specified for averaging the results of the monitoring.”
5.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.”

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

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

01/01/08 to 12/31/08

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number:  <b>Section 10 – Attachment PO General                  General Permit to Operate Conditions</b>	Description: <b>Condition 1 –</b> Can petition Hearing Board within 30 days of receiving permit to alter conditions. <b>Condition 2 –</b> Post Permit reasonably close to equipment – Table 2 is sufficient if remainder of permit available elsewhere. <b>Condition 3 –</b> Permit is not transferable to another location. <b>Condition 4 –</b> Permit will be suspended if requested information if not furnished
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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.

<p><b>Condition 1 –</b> Reference Information only.  <b>Condition 2 –</b> Table 2 posted close to equipment and remainder of permit available electronically everywhere in plant.  <b>Condition 3 –</b> Permit and sources are not transferred or located in alternate locations.  <b>Condition 4 –</b> Information requested by District is furnished within requested time.</p>
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2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

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

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

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

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

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

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

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number: <b>Section 10 –          Permit Shield – Acid Rain Program</b>	Description: <b>Reference Information Only -</b>
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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.

**Not Applicable - Reference Information only**

2. Yes No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above? **Not Applicable**

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

Continuous - All monitoring measurements show compliance with the Part 70 permit condition  
 Intermittent - One or more measurements indicate a failure to meet the Part 70 permit condition  
**Not Applicable**

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.” **Not Applicable**

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.” **Not Applicable**



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

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

01/01/08 to 12/31/08

# **Permit Section: 11**

Miscellaneous Federal Program Conditions

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**Applicable Requirement or Part 70 Permit Condition**

Citation, Including Attachment Number and/or Permit Condition Number:  <b>Section 11 – Attachment 40CFR68 (10/01/02)                  Accidental Release Prevention and Risk Management Plans</b>	Description: <b>Condition 1</b> – Should facility become subject to 40 CFR Part 68, then must submit Risk Management Plan and provide annual 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.

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

**Condition 1**– Threshold Quantity calculations used to determine applicability of 40 CFR Part 68, in addition to administrative storage quantity restrictions.

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

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

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

- 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.”

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

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

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

01/01/08 to 12/31/08

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

Citation, Including Attachment Number and/or Permit Condition Number: <b>Section 11 – Attachment 40CFR82 (10/01/02) Protection of Stratospheric Ozone</b>	Description: <b>Condition 1</b> – Subject to 40 CFR part 82, Subpart B if perform service on motor (fleet) vehicles <b>Condition 2</b> – Subject to 40 CFR Part 82, Subpart F, if perform maintenance on, services, or dispose of appliances
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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.

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

<p><b>Condition 1</b>– Facility does not maintain or otherwise service fleet vehicles at facility. Not subject to requirements specified in permit condition.</p> <p><b>Condition 2</b> – Internal administrative procedures to implement and manage applicable 40 CFR Part 82 requirements.</p>
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- Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?

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

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

- 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.”

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

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

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

01/01/08 to 12/31/08

# **Permit Section: 12**

Part 70 Permit Application Package

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