



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

February 12, 2010

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

Subject: 2009 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, 2009 through December 31, 2009 reporting period. This reporting period is inclusive of Permit No. 00015 (rev 291) which was effective until February 4, 2009 and renewed Permit No. 00015(rev 351) which was issued on February 5, 2009 and remains in effect until December 31, 2013.

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 Ingenhütt, 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:

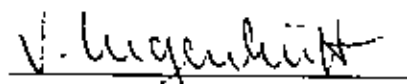
Mr. Gerardo Rios, Chief
Permits Office (AIR-3)
Office of Air Division
EPA Region IX
75 Hawthorne Street
San Francisco, CA 94105

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:  Ms. Vera Ingenhoff Title: Plant Manager	Date: 02/11/10
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Time Period Covered by Compliance Certification (MM/DD/YY):

PO00015 (rev291) applicable from: 01/01/09 to 2/4/09
PO00015 (rev351) applicable from: 02/05/09 to 12/31/09

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM

Cover Sheet

Form TVPF45/07-21-03 Page 1 of 2

Instructions

This compliance certification cover sheet signed by the responsible official, Form TVPF45, must be submitted annually, on the anniversary date of the Part 70 permit; or on a more frequent schedule, if required by an applicable requirement or permit condition. To complete the compliance certification, you will need to attach the following to this sheet:

1. A completed compliance certification permit form (Form TVPF46) for each applicable requirement or Part 70 permit condition. Be sure to attach to the form any information specifically required to be submitted with the compliance certification by the applicable requirement or Part 70 permit condition. On this form, indicate the method(s) for determining compliance; if you are currently in compliance, as determined by the most recent monitoring measurement or observation; and whether the method(s) used for determining compliance indicate continuous or intermittent compliance during the period of certification. Continuous compliance should be checked if the source is in compliance as determined by all monitoring measurements required by the permit during the certification period. Intermittent compliance should be checked if any of these monitoring measurements, or any other information or data, indicates a failure to meet a term or condition of the permit, including a failure to monitor, report, or collect data as required by the permit. For example, if the permit requires an annual source test to demonstrate compliance and that annual source test indicates compliance, and no pre-test or other information indicated noncompliance during the period, compliance is considered to be continuous for the reporting period. If the answer to Question No. 4, 5 or 6 is "Yes" on compliance certification permit form TVPF46, compliance cannot be considered continuous without some further explanation or documentation.

In addition, for the time period covered by the certification, please identify any excursions or exceedances as indicated by the monitoring data. Also identify any information or data beyond the required monitoring that indicates that you are not in compliance. Note that you may cross reference any previous reports regarding compliance status that have previously been submitted to the District.

2. For each applicable requirement or Part 70 permit condition that requires compliance with a quantifiable emission rate, attach a completed quantifiable applicable requirement or Part 70 permit condition form (TVPF47) to Form TVPF46 for all emission units subject to the requirement or condition. On this form, please indicate the emission units subject to the requirement or condition; the pollutant regulated by the requirement or condition; the most recent measured emission rate, and the limited emission rate, both in units consistent with the requirement or condition; and a specific source test or monitoring record citation including the test date.

In lieu of filling out Forms TVPF46 and/or TVPF47, you may supply all of the necessary information required on the attached forms in your own format, and attach this information to Form TVPF45.

2009 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

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Permit Section: 1

Stationary Source Descriptions

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

Permit Section: 2

Permitted Equipment and Applicable Requirements Table

Compliance Certification Not Applicable –
Section Lists Equipment and Applicable Requirements



Permit Section: 3

Permitted Throughput and Consumption Limit Table

Ventura County Air Pollution Control District
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: Section 3 - Permitted Throughput Limits	Description: List of Throughput Permit Limits for Emissions 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.

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."

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

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

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

PG00015 (rev291) applicable from: 01/01/09 to 2/4/09
PG00015 (rev351) applicable from: 02/05/09 to 12/31/09

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.

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: Section 6 – Attachment 74.9N7 (11/14/00) Emergency Standby Stationary Internal Combustion Engines	Description: Condition 1 - Engine Emergency or Maintenance Operation <50 hrs/yr Condition 2 - Emergency Engines are equipped with operating, non resettable, elapsed hour meters. Condition 3 - Maintain the following records: Hours of operation for calendar year during maintenance operation Date, time, duration and reason for emergency operation 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.

Condition 1 – Fire/Emergency and Maintenance hr runtimes tracked in monthly log.
 Condition 2 – All engines are equipped with a non-resettable hour meter.
 Condition 3 – Accumulated operational hrs for each applicable engine are totaled for annual compliance. Simplex event logs are kept for date, time, duration and reason for emergency operation. Engine data 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.”

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

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District. **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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PO00015 (rev351) applicable from: 02/05/09 to 12/31/09

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: Section 6 - 74.15 N.1 Boilers, Heater Treaters, Steam Generators, and Process Heaters	Description: Condition 1 - Emissions: NOx < 40 ppmvd, CO < 400 ppmvd Condition 2 - Source Tested every 24 months using ARB Method 100 Condition 3.a-b: Alternate Fuel Use limitations Condition 4 - Startup emissions exemption Condition 5 - Recordkeeping: Alternate Fuels, Biennial Source test report Condition 6 - Flue Gas Recirculation requirements
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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 - Only Natural Gas was used for the 2009 calendar year. 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."

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

6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances of excursions, exceedances, or other indications of non-compliance during the certification period. Attach all relevant information to this form. You may reference deviation reports, by date and subject, previously submitted to the District. **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: 2009- Section 6 - 74.15N1 - B301 Source Test Data TVPF47

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

PO00015 (rev291) applicable from: 01/01/09 to 2/4/09
PO00015 (rev351) applicable from: 02/05/09 to 12/31/09

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

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

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

B-301 Emissions Source Test is due 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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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: Section 6 – Attachment 74.19N1(11/11/03) Graphic Arts Operations Without an Emissions Capture and Control System	Description: Condition 1: Only use flexographic inks < 225 g/l Condition 2: Fountain Solution < 80 g/l Condition 3: Cleaning using approved ROC content and composite partial pressure Solvents Condition 4: Usage of Methylene Chloride Prohibited Condition 5.a-d: Use Approved Cleaning Methods Condition 6: Closed Container Storage of Materials with ROC content Condition 7: Proper disposal of ROC Material Waste Condition 8.a-c: Maintain records (monthly) for inks and fountain solution usage Condition 9.a-e: Test Method utilization
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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."

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

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

PO00015 (rev291) applicable from: 01/01/09 to 2/4/09
PO00015 (rev351) applicable from: 02/05/09 to 12/31/09

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM0
 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: Section 6 – Attachment 103N5 (02/09/99) Boiler Capacity Factor	Description: Condition 1 – Operate at less than 30% Capacity Factor for CEMs exemption Condition 2 – Install CEMs upon request of District Condition 3 – Monthly fuel records and annual capacity factor Calculation
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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 – Recordkeeping Condition 2 – CEMs installation upon request of District Condition 3 – Monthly Calculation of Annual Capacity Factor – See attached sheet
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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.”

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

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

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

Fuel Usage (MMSCF)	B301
Nov-08	0.02
Dec-08	0.16
Jan-09	0.14
Feb-09	1.34
Mar-09	0.00
Apr-09	0.03
May-09	2.03
Jun-09	0.38
Jul-09	0.70
Aug-09	2.79
Sep-09	4.59
Dec-09	0.37
12 Month Total	12.53

AHI = Fuel Used in 12 Months (MMscf) * Higher Heating Value (MMBTU/MMscf)

AHI = 12.53464 * 1050

AHI = 13,161 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): 8760 hrs

CF = AHI / MPHI

MPHI = RFC * MPOH

CF = 0.0150244 Ratio

MPHI = 876,000 MMBTU

% CF = 1.5% (%CF)

30% of MPHI (Maximum Allowable): 262800 MMBTU

Maximum Allowable Rolling 12 month Fuel Usage: 250.29 MMSCF

Ventura County Air Pollution Control District
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:	Section 6 – Attachment STAMLN15LM6000-NOx-rev291 LM6000 Gas Turbine Based Cogeneration Unit
<p>Description:</p> <p>Condition 1: NOx < 2.5 ppmvd avg. @ 15% O2 over 3 hr. period, Annual Source Test, and CEMs</p> <p>Condition 2: ROC < 2.0 ppmvd @ 15% O2 average over 3 consecutive hrs. Operate Oxidation Catalyst & 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 < 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 < 3.08 lbs/MMscf & source test using method five upon District request</p> <p>Condition 7.a-l: Operate and maintain CEMs & 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 & 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>Condition 1, 2, 4 and 5 – Annual source test conducted on March 24-25, 2009 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>Condition 2, 7, 10, 11, 13 – Recordkeeping</p> <p>Condition 3 – Exemptions applied as encountered during calendar year</p> <p>Condition 5 – Utilize certified Source Test vendors, use specified test methods, and submit documentation per deadline requirements</p> <p>Condition 6 – Conduct source test for PM emissions using EPA Method 5 upon District Request</p> <p>Condition 8 - Maintenance via operators with assistance from CEM manufacturer</p> <p>Condition 9 – Operational procedures ensure compliance with 96 hour reporting requirement</p> <p>Condition 12 – Data Acquisition System data reduction and recordkeeping per specification</p> <p>Condition 14 – Turbine report submitted semi-annually, source test submitted annually</p> <p>* 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>

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 “2009 – 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 Summary of previously reported LM6000 Non Exempt Excess Emissions and Summary of LM6000 CEMS Malfunctions

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

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

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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: LM6000 turbine		Pollutant: NOx
Measured Emission Rate: 1.92 ppm @ 15% O₂	Limited Emission Rate: 2.5 ppm @ 15% O₂	Specific Source Test or Monitoring Record Citation: Horizon Test #: P27-032-FR COMP Test Date: March 24-25, 2009

Emission Unit Description: LM6000 turbine		Pollutant: CO
Measured Emission Rate: 12.37 lbs/MMscf	Limited Emission Rate: 14.11 lbs/MMscf	Specific Source Test or Monitoring Record Citation: Horizon Test #: P27-032-FR COMP Test Date: March 24-25, 2009

Emission Unit Description: LM6000 turbine		Pollutant: O₂
Measured Emission Rate: 14.98%	Limited Emission Rate: N/A	Specific Source Test or Monitoring Record Citation: Horizon Test #: P27-032-FR COMP Test Date: March 24-25, 2009

Emission Unit Description: LM6000 turbine		Pollutant: ROC
Measured Emission Rate: <0.5 ppm @ 15% O₂	Limited Emission Rate: 2 ppm @ 15% O₂	Specific Source Test or Monitoring Record Citation: Horizon Test #: P27-032-FR COMP Test Date: March 24-25, 2009

Emission Unit Description: LM6000 turbine		Pollutant: Fuel HHV
Measured Emission Rate: 419.90 MMBTU/hr	Limited Emission Rate: N/A	Specific Source Test or Monitoring Record Citation: Horizon Test #: P27-032-FR COMP Test Date: March 24-25, 2009

Emission Unit Description: LM6000 turbine		Pollutant: NH₃
Measured Emission Rate: 0.44 ppm @ 15% O₂	Limited Emission Rate: 20 ppm @ 15% O₂	Specific Source Test or Monitoring Record Citation: Horizon Test #: P27-032-FR COMP Test Date: March 24-25, 2009

LM6000 Emission Source Test and RATA are required every 12 months.

Test Notification Provided On: 2/12/09

Test Date: 3/25/09

Test Report Submitted On: 5/5/09

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Summary of LM6000 CEMS Non - Exempt Excess Emissions 2009

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

During the 2009 calendar year our LM6000 Turbine unit had the following Non Exempt Emissions.

On 4/26/09 the LM6000 had one hour of a non-exempt excess NOx emission which did not result in an exceedance of the turbine's permitted 3-hour emissions limit. This non exempt excess emission was previously reported in a CEMS Quarterly Report.

Summary of LM6000 CEMS Malfunction 2009

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

During the 2009 calendar year our LM6000 Turbine unit had the following Malfunctions.

All periods of NO_x, CO, O₂ analyzer calibration malfunction times were reported in Continuous Emissions Monitoring reports submitted: JFM '09 on 4/30/09, AMJ '09 on 7/30/09, JAS '09 on 10/30/09, and OND '09 on 1/30/10.



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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-rev291 Section 6 – Attachment STRMLN15LM2500-NOx,CO-rev351 GE LM-2500 Gas Turbine Based Cogeneration Unit NOx and CO Applicable Requirements
Description: Condition 1 – 3 Hour NOx average < 24 ppmvd @ 15% O ₂ 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 3.9.6 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.

Condition 1, 3 – Annual source test conducted on 5/27/09. Protocol submitted 15 days prior and Results submitted 45 days after the source test. Test Methods – NOx: EPA Method 20, O ₂ : ARB Method 100, CO: ARB Method 100, Fuel HHV: ASTM D3588-91*. Condition 1, 2, 4, 7, 8, 9, 10 – Recordkeeping Condition 5 – Maintenance via operators with assistance from CEMs manufacturer Condition 6 – Operational procedures ensure compliance with 96 hour reporting requirement Condition 11 – Turbine report submitted semi-annually, source test submitted annually <small>* Permit requires Test Method ASTM D2166-93. Approved Test Plan specified use of, equivalent method ASTM D3588-91, current industry standard for fuel HHV evaluation.</small>
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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 #5**
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." **See attached Summary of previously reported LM2500 Non Exempt Excess Emissions and Summary of LM2500 CEMS Malfunctions**

Ventura County Air Pollution Control District
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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 response to question #5**
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):

PO00015 (rev291) applicable from: 01/01/09 to 2/4/09
PO00015 (rev351) applicable from: 02/05/09 to 12/31/09

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM

Quantifiable Applicable Requirement for Part 70 Permit Section 6 - Attachment STRMLN15LM2500-NOx,CO-rev351

Form TVPF47/12-21-98

Emission Unit Description: LM2500 turbine		Pollutant: NOx
Measured Emission Rate: 21.50 ppm @ 15% O2	Limited Emission Rate: 24 ppm @ 15% O2	Specific Source Test or Monitoring Record Citation: Horizon Test #: P27-034-FR COMP Test Date: May 27, 2009

Emission Unit Description: LM 2500 turbine		Pollutant: CO
Measured Emission Rate: 21.60 pph	Limited Emission Rate: 54.98 pph	Specific Source Test or Monitoring Record Citation: Horizon Test #: P27-034-FR COMP Test Date: May 27, 2009

Emission Unit Description: LM2500 turbine		Pollutant: O2
Measured Emission Rate: 14.22%	Limited Emission Rate: N/A	Specific Source Test or Monitoring Record Citation: Horizon Test #: P27-034-FR COMP Test Date: May 27, 2009

Emission Unit Description: LM2500 turbine		Pollutant: Heat Rate
Measured Emission Rate: 243.10 MMBTU/hr	Limited Emission Rate: N/A	Specific Source Test or Monitoring Record Citation: Horizon Test #: P27-034-FR COMP Test Date: May 27, 2009

LM2500 Emission Source Test and RATA are required every 12 months.

Test Notification Provided On: 5/5/09

Test Date: 5/27/09

Test Report Submitted On: 6/26/09

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Summary of LM2500 CEMS Non - Exempt Excess Emissions 2009

**Additional Information for TVPF46 form: Section 6 - STRMLN15LM2500-NOx-rev351 - GE LM2500 Gas Turbine
Based Cogeneration Unit**

During the 2009 calendar year our LM2500 Turbine unit had the following Non Exempt Emissions.

On 2/22/09 the LM2500 had one hour of a non-exempt excess NOx emission which did not result in an exceedance of the turbine's permitted 3-hour emissions limit. This non exempt excess emission was previously reported in a CEMS Quarterly Report.

In addition, Breakdown Reports submitted on 1/02/09 and 2/08/09 reported additional non exempt excess emissions.

Summary of LM2500 CEMS Malfunctions 2009

Additional Information for TVPF46 form: Section 6 - Attachment STRMLN15LM2500-NOx,CO-rev351

During the 2009 calendar year our LM2500 Turbine unit had the following Malfunctions.

All periods of NO_x, CO, O₂ analyzer calibration malfunction times were reported in Continuous Emissions Monitoring reports submitted: JFM '09 on 4/30/09, AMJ '09 on 7/30/09, JAS '09 on 10/30/09, and OND '09 on 1/30/10.

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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

<p>Citation, Including Attachment Number and/or Permit Condition Number: Section 6 – Attachment STRMLN15-SO₂-rev351</p> <p>LM6000 and LM2500 Gas Turbine Based Cogeneration Units SO₂ Applicable Requirements - Streamlined</p>	<p>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 – All emissions must be < 300 ppm SO₂ at discharge Condition 4 – Upon Request source test for SO₂ at discharge points</p>
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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 1-3 - Both the LM6000 and LM2500 exclusively used PUC-quality natural gas in 2009.
Condition 4 – 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):

PO00015 (rev291) applicable from: 01/01/09 to 2/4/09
PO00015 (rev351) applicable from: 02/05/09 to 12/31/09

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Section 6 – Attachment NESHAP KK 40 CFR Part 63 Subpart KK Applicable Requirements	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):

PO00015 (rev291) applicable from: 01/01/09 to 2/4/09
PO00015 (rev351) applicable from: 02/05/09 to 12/31/09

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Section 6 – Attachment ATCM Engine N1 ATCM for Stationary Compression Ignition Engines	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.

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: 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

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):

PO00015 (rev291) applicable from: 01/01/09 to 2/4/09
PO00015 (rev351) applicable from: 02/05/09 to 12/31/09

Permit Section: 7

Permit Specific Conditions (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: Section 7 - Attachment P000015PC1rev 351 Throughput & Consumption Limits and Solvent Records	Description: Condition 1 - Monthly throughput (emissions) records Condition 2 - Solvent purchase and disposal 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.

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 records of emissions specified in Table 3 throughput column are recorded and available upon request.
Condition 2 -	Exempt Solvent list maintained and available upon request.

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):

PO00015 (rev291) applicable from: 01/01/09 to 2/4/09
PO00015 (rev351) applicable from: 02/05/09 to 12/31/09

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Applicable Requirement or Part 70 Permit Condition

<p>Citation, Including Attachment Number and/or Permit Condition Number: Section 7 – Attachment PO00015PC2-rev 351</p> <p>Combustion Emissions Units: LM6000, LM2500, B&W Steam Boiler, 1X Hot Air, 1X Yankee Furnace, 2X Furnaces</p>	<p>Description: Condition 1 – Facility wide TPY emissions limits for Combustion Units Condition 2 – All specified Combustion Units will be fired on Natural Gas (NG) Condition 3 – Maintain records: 12 mo. Rolling average fuel usage and emissions based on factor and CEM units.</p>
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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 permits 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>Condition 1 – Monthly monitoring of emissions records to ensure compliance with facility wide emissions limits. Condition 2 – Facility exclusively utilizes Natural Gas to fire all specified combustion units at facility. Condition 3 – Monthly records of fuel usage. Emission factors are used for ROC, PM, and SOx. CEMS data is used on the LM6000 & 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):

PO00015 (rev291) applicable from: 01/01/09 to 2/4/09
PO00015 (rev351) applicable from: 02/05/09 to 12/31/09

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Section 7 – Attachment P000015PC3-rev351 2X Papermachine Hot Air Furnace and “Yankee” Hood Furnace Furnaces Requirements	Description: Condition 1 – NOx < 0.08 lb/MMBTU, CO < 0.045 lb/MMBTU Condition 2 – Fuel and air settings locked as specified in permit. Settings recorded every 6 months Condition 3 – Source test using ARB Method 100 for NOx, CO and O2. Notification & Test Protocol to District 15 days in advance. Report within 45 after test. Condition 4 – Screening Analysis with portable analyzer performed every 24 months
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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, 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

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 attached TVPF47**

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

PO00015 (rev291) applicable from: 01/01/09 to 2/4/09
PO00015 (rev351) applicable from: 02/05/09 to 12/31/09

PO00015Ventura 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: 2X Yankee "Hood" Furnace (40 mmBTU/hr)		Pollutant: NOx
Measured Emission Rate: 0.011 lbs/mmBtu	Limited Emission Rate: 0.08 lbs/mmBtu	Specific Source Test or Monitoring Record Citation: Horizon P27-031-FR Test Date: 9/16/08

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

"Yankee Hood" Furnace emissions testing is required every 24 months. The next source test is due before 9/30/2010.

Test Notification provided on: 7/29/08

Test Date on: 9/16/08

Test Report submitted on: 10/30/08

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

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

Hot Air Furnace emissions testing is required once per permit term. The next source test is due prior to March 31st 2013:

Test Notification for provided on: 9/7/06

Test Date: 9/14/06

Test Report Submitted On: 10/26/06

1)

2)

3)

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

Citation, Including Attachment Number and/or Permit Condition Number: Section 7 – Attachment P000015PCA – rev351 Flue Gas Recirculation (FGR) Requirements Babcock & Wilcox Steam Boiler	Description: 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.
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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.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
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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):

PO00015 (rev291) applicable from: 01/01/09 to 2/4/09
PO00015 (rev351) applicable from: 02/05/09 to 12/31/09

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number:	Section 7 – Attachment P000015PCS-rev351 Particulate Matter Emission Requirements 1X Paper Machine, 2X Paper Machine, Wet Lapper and Converting Line Rooms
Description: Particulate Matter Emissions Requirements. Condition 1: 1X PM < 6.75 lbs/hr, 2X PM < 3.99 lbs/hr, Wet Lapper < 0.10 Condition 2: Daily average of hourly readings of scrubber pressure drop and liquor flow rate for 1X, 2X and wet lapper scrubbers. Condition 3.a-e: Daily Record not required for less than full day operation. Excursions to be corrected expeditiously, meters and gauges maintained per facility plan, and made available upon request. Excursions require summary of corrective actions. Semi annual report of Excursions. Condition 4.a-b: PM emissions < Rule 52 & 53 table limit Condition 5: Compliance with Rule 52 & 53 achieved with compliance with Condition 1 and 2 Condition 6: Converting room emissions shall be re-circulated back into room	

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>Condition 1-2, 4-5: 1X, 2X, and Wet Lapper Scrubber operation to ensure Pressure Drop, and Liquor Flow Rate are not less than the permit specified values.</p> <p>Condition 3 –Records of Hourly and Daily operation kept. Excursion correction and summaries documented. Semi annual report submitted.</p> <p>Condition 6 – Converting Room emissions are circulated back into room via duct work maintained by plant personnel.</p>

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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Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
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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):

PO00015 (rev291) applicable from: 01/01/09 to 2/4/09
PO00015 (rev351) applicable from: 02/05/09 to 12/31/09

1)

2)

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

Citation, Including Attachment Number and/or Permit Condition Number: Section 7 – Attachment P000015PC6-rev351 ROC Emission Requirements Manufacturing Chemicals for Ink and Additive Applications	Description: Condition 1 – Inks and additives facility 12 month rolling average ROC limit Condition 2 – 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?
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Time Period Covered by Compliance Certification (MM/DD/YY):

PO00015 (rev291) applicable from: 01/01/09 to 2/4/09
PO00015 (rev351) applicable from: 02/05/09 to 12/31/09

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: Section 7 – Attachment PO00015PC7-rev291 Federal PSD Permit Requirements Cogeneration Turbine (LM-6000), Cogeneration Turbine (LM-2500) Babcock & Wilcox Steam Boiler, 1X Paper Machine Hot Air Furnace, and 1X Papermachine “Yankee” Hood Furnace	Description: Condition 1 – If request increase in permitted NOx emissions for combustions sources above 250 TPY, submit PSD application for LM6000 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 – 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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Time Period Covered by Compliance Certification (MM/DD/YY):

PC00015 (rev291) applicable from: 01/01/09 to 2/4/09
PC00015 (rev351) applicable from: 02/05/09 to 12/31/09

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Section 7 – Attachment P000015PC8 ERC Certificate No. 1166	Description: Condition 1 – All motor vehicle parking and traffic on paved surfaces only. No unpaved areas readily accessible by vehicle. Except for emergencies, construction, maintenance and agricultural use.
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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.”
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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. **Not Applicable**

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

PO00015 (rev291) applicable from: 01/01/09 to 2/4/09
PO00015 (rev351) applicable from: 02/05/09 to 12/31/09

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: Section 8 – Attachment Rule 50 (04/13/04) Opacity	Description: Condition 1 – 3 Minute emissions in hour less than 20% Opacity Condition 2 – Routine Surveillance and record of visible emissions Condition 3 – Annual compliance certification, including site survey Condition 4 – EPA Method 9 survey per District request
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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 – No instances of >20% Opacity nor >No. 1 on the Ringelmann Chart were discovered during periodic surveillance of emissions by VEE certified person in 2009. Condition 3 – Visible emissions survey conducted on August 15, 2009; Survey performed by certified VEE. Certification # 19390- 7/29/09 Condition 4 – Per District request.
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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):

PO00015 (rev291) applicable from: 01/01/09 to 2/4/09
PO00015 (rev351) applicable from: 02/05/09 to 12/31/09

Opacity Survey
Procter & Gamble Oxnard Plant

VCAPCO Part 70 Permit, Attachment 50 Compliance Document

Conducted On:
Conducted By:

Date: August 15, 2009
Kathleen Green

Time: 9:45 am
Signature: [Signature]

Permit Emission Points
Drawing - PG-3419820

Visible Emissions Certification # 19890
Most Recent Certification Date 7/29/09

Stack	Stack Height (ft)	Stack Dia (sq ft)	Emissions Unit	Emission Description	Stack Position	Visible Emissions?
S-1	62	2.10	Washer Wet Lapper	PM	When Fan motor on	NO
S-2	84	12.67	Cogen 2/LM6000 Turbine	Thermal Output with NOx, CO, SOx, PM, ROC, NH3	Damper closed when 2X is running	NO
S-3	27	4.40	B-302 Steam Boiler	Thermal Output with NOx, CO, SOx, PM, ROC	FGR closed during SU (1hr) only - 100% Exhaust - otherwise partial exhaust	NO

Stack S-4 is not a physical stack but represents the totals stacks from 1X process stacks 4A-4E

S-4A	56	4.72	1X PreDryer	Thermal Output with NOx, CO, SOx, PM, ROC HAF + Burners DR Cogen + Burners	Open when 1X running	Water plane - NO
S-4B	-	-	Furnace Cooling	Hot Air Release from shell cooling	Open	Water - NO
S-4C	-	-	HRB	Thermal Output, NOx, CO, SOx, PM, ROC	Normally Closed	NO
S-4D	50	9.63	Cogen 1/LM7500 Turbine	Thermal Output, NOx, CO, SOx, PM, ROC	Damper closed when 1X running	NO
S-4E	-	-	W/WL Broke Pulper vent	PM	Open vent	NO
S-5	-	-	1X Scrubber	PM	When Fan motor on	NO
S-6	-	-	2X Scrubber	PM	When Fan motor on	NO

Stack S-7 is not physical stack but represents the totals stacks from 2X NOTE - PreDryer Exhaust is the emission from the YHAF (after drying)

S-7A	74	12.22	2X PreDryer Exhaust (YHAF Stack)	Thermal Output with NOx, CO, SOx, PM, ROC, NH3 LM6000 + HAF + PD	Normally Open	NO
S-7B	-	-	Exhaust Diversion (PDF Stack)	Thermal Output with NOx, CO, SOx, PM, ROC, NH3	Normally Closed	NO
S-7C	-	-	2X Vacuum Stack	PM	Open Vent	Water plane
S-7D	-	-	2X Wet End (Foamer)	PM	Open Vent	Water plane
S-7E	-	-	2X Broke Pulper Vent	PM	Open Vent	NO
1			Fire Pump #1	CARB Fuel Combustion	Open vent	Replaced with Electric Pump
2			Fire Pump #2	CARB Fuel Combustion	Open vent	NO
3			Fire Pump #3	CARB Fuel Combustion	Open vent	NO
4			Fire Pump #4	CARB Fuel Combustion	Open vent	NO
5			Fire Pump #5	CARB Fuel Combustion	Open vent	NO

RDC Emission points

			BOILING Compressor Yard		RDC	N/A
			Parts Cleaner - Parking		RDC	N/A
			Parts Cleaner - Cvtg		RDC	N/A
			Parts Cleaner - Truck Shop		RDC	N/A
			Ink Room		RDC	N/A

Any Other Visible Emissions? NO

Atmospheric Conditions: Sunny - slight breeze (0.8 mph) - clear

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

Citation, Including Attachment Number and/or Permit Condition Number: Section 8 – Attachment 54.B.1 Sulfur Compounds – Sulfur Emissions from Combustion Operations at Point of Discharge	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.

Condition 1 – Compliance with permit condition Attachment P00015PC2. Only PUC-quality natural gas and CARB approved diesel used on site in 2009 Conditions 2 – Fuel Oil Sulfur Content provided by supplier at each delivery. Gaseous sulfur content meeting PUC Quality requirements. Data furnished to district upon request. Condition 3 – Furnish District with data upon request.

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 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."

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
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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):

PG00015 (rev291) applicable from: 01/01/09 to 2/4/09
PG00015 (rev351) applicable from: 02/05/09 to 12/31/09

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

Citation, including Attachment Number and/or Permit Condition Number: Section 8 - 54.B.2 Sulfur compounds - SO2 Concentrations.	Description: Condition 1 - Property Line SO2 concentrations: 1 hr < 0.25 ppmv, 24 hr < 0.04 ppmv Condition 2 - Provide fuel or exhaust analysis to District upon request Condition 3a-c - 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.

Condition 1 - Compliance with permit condition Attachment P00015PC2. Only PUC-quality natural gas, and CARB approved diesel used on site in 2009
Conditions 2 - 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.
Condition 3 - Furnish District with data 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
 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 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**

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

PO00015 (rev291) applicable from: 01/01/09 to 2/4/09
PO00015 (rev351) applicable from: 02/05/09 to 12/31/09

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number:	Section 8 – Attachment 55, Fugitive Dust
Description: Condition 1 – Do not cause or allow fugitive dust such that is visible past the property line. Condition 2 – Do not cause or allow fugitive dust to cause 20% opacity as measured by EPA Method 9 using Rule 55 modifications. Condition 3 – Do not allow "track-out" to extend ≥ 25 ft unless control measures are utilized Condition 4 - Remove all "track-out" at the conclusion of each workday or evening shift Condition 5 - Comply with specific activity requirements for earth moving, bulk material handling, and truck hauling activities Condition 6 - Comply with specific record keeping requirements for each type of activity Condition 7 - Annually certify that all applicable source of dust are in compliance or certify that there are no operations, disturbed surface areas, or man made conditions that are subject to Rule 55.	

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- Outdoor projects are controlled and monitored such that Conditions 1-2 are met. Condition 3 – Site property is such that the possibility of track out is minimized. For projects where the possibility of track out exists - vehicles are inspected and managed to prevent track out. Condition 4 – When applicable, Track Out is removed at the conclusion of each workday or shift. Condition 5 – Site utilizes procedures and methods for prevent fugitive dust. Condition 6 – When required records are kept. Condition 7 – Ongoing assessment of site activity to ensure Rule 55 compliance.

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.

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

02/05/09 to 12/31/09

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Section 8 – Attachment 57.1 (01/11/05) Particulate Matter Emissions from Fuel Burning Equipment	Description: Condition 1 – PM shall not exceed 0.12 lbs/mmBTU Condition 2 – Compliance demonstration required upon district request Condition 3 – Periodic monitoring not required. Certify compliance by referring to District Rule 57.B analysis dated 12/3/97
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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 Conditions 2 & 3 of this attachment. Condition 2 – Monitoring not required based on district analysis (Per comments in permit, Table 1.C.3, Condition 57.1) Condition 3 – Periodic monitoring not required. Compliance certified via District analysis of Rule 57.B, dated 12/3/97.
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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):

PO00015 (rev291) applicable from: 01/01/09 to 2/4/09
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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Section 8 – Attachment 64.B.1 (04/13/99) Sulfur Content of Fuels – Gaseous Fuel Requirements	Description: Condition 1 – Gaseous Fuel sulfur compounds < 788 ppmv Condition 2 – Periodic Monitoring not required if using PUC Natural Gas Condition 3 – Analyze fuel if using non PUC quality fuel Condition 4a-b – Landfill or oilfield gaseous fuel usage monitoring
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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?
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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. **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: Section 8 – Attachment 64.B.2 (04/13/99) Sulfur Content of Fuels – Liquid Fuel Requirements	Description: Condition 1 – No liquid Fuel usage with sulfur content > 0.5% by weight Condition 2 – If only use ARB quality liquid fuel compliance is assured without monitoring Condition 3 – Requirements for use of non ARB liquid fuels
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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 2009– 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: CARB diesel certification provided with fuel purchase record.**

- 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:	Section 6 & 8 – Attachment 74.6 (11/11/03) Surface Cleaning and Degreasing
Description: Condition 1.a-c: Limitations on use of solvents in surface cleaning. Electronics cleaning solvent < 900 g/l ROC & < 33 mmHg partial pressure. Other cleaning solvents < 25 g/l as applied. Condition 2.a-d: If use solvents > 25 g/l ROC use indicated methods: Wipe cleaning; closed container dispensing of less than 1 liter; flow, dip, or flush with solvent collection; enclosed gun washer. Condition 3: No leaks from solvent containing equipment or containers. Condition 4: No solvents shall be solicited, supplied, sold, or used that would violate Rule 74.6. Condition 5: Use less than one gallon of halogenated solvents per week for cold cleaning. If use maintain records. Condition 6: Solvent stored in non-absorbent containers and closed except for filling or emptying. Condition 7: Dispose of solvents and solvent residues as California Hazardous Waste. Condition 8.a-f: Cold Cleaning equipment requirements, except for non-remote reservoir. Condition 9.a-e: Remote Reservoir equipment requirements. Condition 10.a-g: Cold Cleaner operating requirements. Condition 11.a-h, 12.a-o, 13: Rule 74.6 exemptions. Condition 14.a-d: Solvent Material recordkeeping requirements made available to District upon request. Condition 15: Maintain records and perform routine surveillance of solvent cleaning activities per Conditions 1-14. Upon district Request demonstrate compliance per permit requirements.	

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, 6-7:	Compliance for permit conditions pertaining to solvent storage and handling is satisfied via personnel training and observation. Chemical Approval System ensures conformity with solvent ROC content limits.
Condition 5:	Facility does not use halogenated cold cleaner solvents
Conditions 8-10:	Cold cleaners are exempt per section 5 of our permit.
Condition 11:	Exempted Solvents maintained on list per Section 7, PC1.C2
Condition 14:	Recordkeeping per permit requirements.
Condition 15:	Visual surveillance performed routinely. Site uses chemical approval process to confirm that only ROC content acceptable solvents are purchased and used on site.

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):

PO00015 (rev291) applicable from: 01/01/09 to 2/4/09
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Applicable Requirement or Part 70 Permit Condition

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

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Applicable Requirement or Part 70 Permit Condition

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

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Permit Section: 9

General Requirements for Short-Term Activities (Attachments)

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Section 9 – Attachment 74.1 (10/01/02) Abrasive Blasting	Description: Condition 1.a-c: Abrasive Blasting shall be conducted indoors, using specified methods Condition 2.a-d: For Outdoor blasting use steel or iron shot/grit or must utilize permit specified alternate methods Condition 3 – Adhere to Rule 74.1.B.2 requirements for pavement marking Condition 4 – Stucco and concrete blasting per Rule 74.1.B.3 Condition 5 – Use California approved and labeled materials for abrasive blasting Condition 6 – Comply with visible emissions standard per rule 74.1.C.2 Condition 7.a-e: Routine Surveillance and visual inspection of blasting operations. Surveillance to include permit specified recordkeeping.
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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 – Condition 2 – Conditions 3–4: Condition 5 – Condition 6 – Condition 7 –	Utilize enclosed particulate capture system for indoor abrasive blasting. Use of approved materials and methods for outdoor blasting directed by written instructions. 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. Use of California approved materials verified by site environmental resources. Work process for outdoor blasting conforms to visible emission standards. Records of Abrasive blasting surveillance maintained by Site Environmental Leader. Indoor blasting conducted in sealed cabinet with filtered exhaust, such that visible emissions to atmosphere are not possible.
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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**
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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Section 9 – Attachment 74.2 (01/01/04) Architectural Coatings	Description: Condition 1.a-c: VOC Coating content limits, less water and exempt OC's, Flat <100 g/l; Nonflat <150 g/l; Nonflat High Gloss <250 g/l Condition 2 – Specialty coatings shall conform with Rule 74.2 Table of Standards. Industrial Maintenance <250 g/l less water & exempt OC's Condition 3 – Architectural coatings and cleaning materials to remain closed except when in use. Condition 4 – Adhere to Rule 74.2.B.1 thinning requirements Condition 5 – Routine Surveillance of architectural coating operations. Maintain VOC data on coatings used, and submit to district upon request Condition 6 – VOC content and other properties measured per procedures in Rule 74.2.G
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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>Condition 1, 2 – All paints used at facility are reviewed for compliant VOC content prior to approval for use.</p> <p>Condition 3 – Closure requirements are documented and training provided to all site personnel and contractors.</p> <p>Condition 4 – Paints are used as supplied by vendor.</p> <p>Condition 5 – Visual observations occur routinely. VOC data maintained for each coating via vendor supplied MSDS. Data will be furnished to District upon request.</p> <p>Condition 6 – Architectural coating properties determined using vendor supplied data.</p>

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):

PO00015 (rev291) applicable from: 01/01/09 to 2/4/09
PO00015 (rev351) applicable from: 02/05/09 to 12/31/09

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Section 9 – Attachment 74.28 Asphalt Roofing Operations	Description: Condition 1 – Kettles shall operate with lids. Lid will not be opened unless temperature is < 150°F Condition 2 – Max Temperatures: Asphalt < 500°F, Coal tar pitch < 400°F Condition 3 – Lid to remained closed, and receiving containers to be covered Condition 4 – Kettle vents to remain closed at all times Condition 5 – Facility will verify Rule 74.28 requirements met during projects
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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. Roofing performed in 2009 used Burmastic Cold Roofing Process

- 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):

PO00015 (rev291) applicable from: 01/01/09 to 2/4/09
PO00015 (rev351) applicable from: 02/05/09 to 12/31/09

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Section 9 - Attachment 40 CFR 61.M National Emissions standards for Asbestos	Description: Condition 1 – Comply with 40 CFR part 61, Subpart M Condition 2 – 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.

Condition 1 – Site Asbestos abatement program managed consistent with 40 CFR Part 61, Subpart M. State certified contractors are utilized for ACM demolition and renovation. Adherence with 40 CFR Part 61.145 is mandatory for job approval. Condition 2 – ACM demolition and renovation are observed by site resources to ensure compliance with 40 CFR Part 61.145. Activities involving ACM recorded are filed with Site Environmental Leader. Notification is provided to District prior to ACM renovation or demolition for activities requiring notification.

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):

PO00015 (rev291) applicable from: 01/01/09 to 2/4/09
PO00015 (rev351) applicable from: 02/05/09 to 12/31/09

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: Section 10 - District General Part 70 Permit Conditions	Description: Condition 1 – Comply with all federally enforceable conditions, and comply with all applicable requirements already in compliance with. Condition 2 – Comply with new Requirements in a timely manner Condition 3 – Promptly report deviations (within less than 4 hours) Condition 4 – The need to halt / reduce activity is not a defense Condition 5 – Retain all Records for at least 5 years. Condition 6 – All applicable reports submitted to District every 6 months with Responsible Official Certification. Condition 7.a-d: Facilitate permit specified District inspection rights Condition 8 – Permit may be modified, revoked, reopened, reissued or terminated for cause Condition 9.a-d: Permit will be reopened per permit specified reasons Condition 10 – All fees shall be paid on timely basis Condition 11 – Permit does not convey property rights Condition 12 – One invalid term / condition does not invalidate the entire permit Condition 13 – Renewal application must be submitted between 6 to 18 months prior to expiration Condition 14 – Renewal application, and Part 70 requires reports must be certified by a responsible official Condition 15 – Annual Compliance Certification
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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 payments exist.
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 10: VCAPCD Staff review fee per letter to District on 10/2/09

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):

PO00015 (rev291) applicable from: 01/01/09 to 2/4/09
PO00015 (rev351) applicable from: 02/05/09 to 12/31/09

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Section 10 – Attachment PD General General Permit to Operate Conditions	Description: Condition 1 – Can petition Hearing Board within 30 days of receiving permit to alter conditions. Condition 2 – Post Permit reasonably close to equipment – Table 2 is sufficient if remainder of permit available elsewhere. Condition 3 – Permit is not transferable to another location. Condition 4 – Permit will be suspended if requested information if not furnished
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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 – Reference Information only. Condition 2 – Table 2 posted close to equipment and remainder of permit available electronically everywhere in plant. Condition 3 – Permit and sources are not transferred or located in alternate locations. Condition 4 – Information requested by District is furnished within requested time.
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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):

PO00015 (rev291) applicable from: 01/01/09 to 2/4/09
PO00015 (rev351) applicable from: 02/05/09 to 12/31/09

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Section 10 – Shield -40CFR 72-78 Permit Shield – Acid Rain Program	Description: Reference Information Only -
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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):

PO00015 (rev291) applicable from: 01/01/09 to 2/4/09
PO00015 (rev351) applicable from: 02/05/09 to 12/31/09

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Section 10 – Shield 60 KKKK - Permit Shield – Standards of Performance for Stationary Combustion Turbine	Description: Reference Information Only -
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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):

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Section 10 - Shield YYY Permit Shield - NESHAPs	Description: Reference Information Only -
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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):

02/05/09 to 12/31/09

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: Section 11 – Attachment 40CFR68 Accidental Release Prevention and Risk Management Plans	Description: Condition 1 – 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.

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

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):

PO00015 (rev291) applicable from: 01/01/09 to 2/4/09
PO00015 (rev351) applicable from: 02/05/09 to 12/31/09

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Applicable Requirement or Part 70 Permit Condition

Citation, Including Attachment Number and/or Permit Condition Number: Section 11 – Attachment 40CFR82 Protection of Stratospheric Ozone	Description: Condition 1 – Subject to 40 CFR part 82, Subpart B if perform service on motor (fleet) vehicles Condition 2 – Subject to 40 CFR Part 82, Subpart F, if perform maintenance on, services, or dispose of appliances
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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– Facility does not maintain or otherwise service fleet vehicles at facility. Not subject to requirements specified in permit condition.

Condition 2 – Internal administrative procedures to implement and manage applicable 40 CFR Part 82 requirements.

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):

PO00015 (rev291) applicable from: 01/01/09 to 2/4/09
PO00015 (rev351) applicable from: 02/05/09 to 12/31/09

Permit Section: 12

Part 70 Permit Application Package

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

