

# VENTURA REGIONAL SANITATION DISTRICT

1001 PARTRIDGE DRIVE, SUITE 150 • VENTURA, CA 93003-0704



February 11, 2010

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

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

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

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

A handwritten signature in cursive script that reads 'Sally Coleman'.

SALLY COLEMAN – DIRECTOR OF OPERATIONS

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VENTURA COUNTY  
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Ventura County Air Pollution Control District  
COMPLIANCE CERTIFICATION PERMIT FORM

Cover Sheet

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

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

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

**Confidentiality**

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

**Certification by Responsible Official**

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

|   |                             |
|---|-----------------------------|
| Signature and Title of Responsible Official:<br><br><i>Jenny Coleman</i> Title: <i>Director of operations</i> | Date:<br><br><i>2-10-10</i> |
|---|-----------------------------|

Time Period Covered by Compliance Certification:  
01 / 01 / 09 (MM/DD/YY) to 12 / 31 / 09 (MM/DD/YY)

I.c. PERIODIC MONITORING SUMMARY

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

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

1.c.1. Specific Applicable Requirements

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

| Attachment No./Condition No. | Applicable Rule or Requirement | Monitoring   | Recordkeeping  | Semi-annual Reports  | Test Methods  | Comments |
|------------------------------|--------------------------------|--|--|--|---|----------|
| 74.17.IN3                    | Rule 74.17.1                   | <ul style="list-style-type: none"> <li>• Annual compliance certification</li> <li>• Monitor landfill gas flow rate to off-site engines</li> <li>• Monitor flare gas flow rate and flare temperature</li> <li>• Monitor wells and collection header (temperature, pressure, nitrogen, oxygen)</li> <li>• Monitor methane concentration at the surface of the landfill</li> <li>• Source test flare every 2 years (NMOC, NOx, and CO)</li> </ul> | <ul style="list-style-type: none"> <li>• Records of waste in place and annual waste acceptance rate</li> <li>• Records of landfill gas flow rate to off-site engines</li> <li>• Records of flare testing</li> <li>• Records of flare temperature and landfill gas flow to the flare</li> <li>• Records of existing wells, newly installed wells, and planned wells</li> <li>• Records of methane concentration at the landfill surface</li> <li>• Records of asbestos-containing or non-degradable waste</li> <li>• Records of exceedances</li> <li>• Records of SSM plan</li> </ul> | <ul style="list-style-type: none"> <li>• Reports of exceedances</li> <li>• Reports of new wells</li> </ul> | <ul style="list-style-type: none"> <li>• NMOC-EPA Test Method 25 or 18</li> <li>• NOx - EPA Method 7</li> <li>• CO - EPA Method 10</li> <li>• Calorific value - ASTM Method D1826-77</li> <li>• O2 - EPA Method 3A</li> <li>• Exhaust Flow - F Factor EPA Method 19</li> <li>• Surface Methane - EPA Method 21</li> </ul> |          |
| 40CFR63AAAA                  | 40 CFR Part 63, Subpart AAAAA  | <ul style="list-style-type: none"> <li>• Annual compliance certification</li> <li>• Comply with 40 CFR Part 60, Subpart Cc</li> <li>• Develop a startup, shutdown, malfunction (SSM) plan</li> </ul>   |  | <ul style="list-style-type: none"> <li>• SSM plan reports</li> </ul>                                       |   |          |

1.c.2. Permit-Specific Conditions

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

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



1.c.2. Permit-Specific Conditions (Continued)

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

1.c.2. General Applicable Requirements

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

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

1.c.3. General Applicable Requirements (Continued)

| Attachment No./Condition No. | Applicable Rule or Requirement | Monitoring  | Recordkeeping   | Semi-annual Reports | Test Methods  | Comments  |
|------------------------------|--------------------------------|---|---|---------------------|---|---|
| 64.B.2                       | Rule 64.B.2                    | <ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Fuel supplier's certification, or fuel test per each delivery (submit with annual compliance certification)</li> </ul>                              | <ul style="list-style-type: none"> <li>Fuel supplier's certification, or fuel test per each delivery</li> </ul>           | None                | <ul style="list-style-type: none"> <li>ASTM Method D4294-83 or D2622-87</li> </ul>  |   |
| 74.6                         | Rule 74.6                      | <ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Maintain current solvent information</li> <li>Routine surveillance of solvent cleaning activities</li> <li>Upon request, solvent testing</li> </ul> | <ul style="list-style-type: none"> <li>Records of current solvent information</li> </ul>                                  | None                | <ul style="list-style-type: none"> <li>ROC content-EPA Test Method 24</li> <li>Identity of solvent components-ASTM E168-67, ASTM E169-87, or ASTM E260-85.</li> <li>True vapor pressure or composite partial pressure -ASTM D2879-86 or other methods per Rule 74.6.G.5</li> <li>Initial boiling point-ASTM 1078-78 or published source</li> <li>Spray gun active/passive solvent losses-SCAOMD Method (10-3-89)</li> </ul> |   |
| 74.11.1                      | Rule 74.11.1                   | <ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Maintain identification records of large water heaters and small boilers</li> </ul>   | <ul style="list-style-type: none"> <li>Records of current information of large water heaters and small boilers</li> </ul> | None                | None  | <ul style="list-style-type: none"> <li>Rule only applies to future installation of large water heaters and small boilers</li> </ul> |
| 74.22                        | Rule 74.22                     | <ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Maintain furnace identification records</li> </ul>  | <ul style="list-style-type: none"> <li>Records of current furnace information</li> </ul>                                  | None                | None  | <ul style="list-style-type: none"> <li>Rule only applies to future installation of natural gas-fired, fan-type furnaces</li> </ul>  |

1.c.4. General Requirements for Short-Term Activities

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

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

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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:<br><br>Condition No. 74.17.1N3 | Description: Rule 74.17.1 – Municipal Solid Waste Landfills. |
|--|--|

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

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

Gas at wellhead, Temperature, Gas Pressure, Oxygen Concentration - Monthly  
 Flare Testing – Biennial or as required.

Flare Temperature and Flow – Continuous

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

Methane testing at well surface – Quarterly – Portable Organic Vapor Analyzer  
 System bypass - not installed

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

Report of installation and location of new wells or collection system expansion - new collection system lines were installed on the Santa Clara Landfill portion of the system in December 2009. (Map attached)

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

3. Please indicate if 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.”

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

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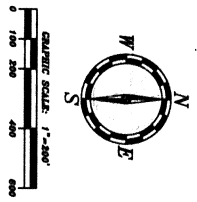
5.  Yes  No During the time period covered by this compliance certification, does the monitoring data indicate any exceedances, if applicable? An *exceedance* is defined as “a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates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

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09



- LEGEND**
- ◆ LIFT WELL LOCATION (MARKETED)
  - ABOVE GROUND LIFT HEADER
  - BURIED LIFT HEADER
  - COMPRESSED AIR/COMPONENT T LINES (TO AND FROM BUMP)
  - COMPONENT BUMP WITH VALVE
  - CEMENT ACCESS VAULT
  - BUTTERFLY VALVE WITH ACCESS VAULT
  - ⊕ SPIN IN/OUT COMPONENTS
  - MAJOR CONTOUR
  - MINOR CONTOUR
  - PROPERTY LINE
  - CHUTE PATH



|                                      |  |   |
|--------------------------------------|--|---|
| TITLE<br>PROJECT<br>DATE<br>SHEET OF | <p><b>SANTA CLARA LANDFILL<br/>GAS COLLECTION SYSTEM<br/>"AS BUILT"</b></p> <p>Topography dated March 24, 2008</p> | <p><b>VENTURA REGIONAL SANITATION DISTRICT</b><br/>         1001 Partridge Drive, Suite 150<br/>         Ventura, California 93003-5562</p> |
|--------------------------------------|--|---|

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

|   |   |
|---|---|
| Citation, Including Attachment Number and/or Permit Condition Number: | Description: 40CFR Part 63, Subpart AAAA. |
| Condition No. 40CFR63AAAA   |   |

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.

A Start-up, Shutdown, Malfunction Plan was revised and implemented during 2009. Compliance with 40CFR Part 60, Subpart Cc was maintained during 2009.

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

Time Period Covered by Compliance Certification:

01/01/09 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:<br><br>PO1399PC1 – Condition No. 1<br>Rule 26 | Description:<br>The annual amount of landfill gas combusted in the flare shall not exceed 711,000 million BTUs (MMBTU) per year. Landfill gas may be burned in either flare or in both flares simultaneously. |
|---|---|

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.

4,418 MMBTU was consumed in Flare #2 during 2009. The limit established for the flare is 350,000 MMBTU's. Gas consumption is recorded by a totalizer. This facility is in compliance.

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

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

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09

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**Applicable Requirement or Part 70 Permit Condition**

|   |   |
|---|---|
| Citation, Including Attachment Number and/or Permit Condition Number:<br><br>PO1399PC1 – Condition No. 2<br>Rule 29 | Description: Monthly records of solvent purchase. |
|---|---|

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

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

Only non-refillable aerosol solvents are used in 14 ounce or less size containers. These are purchased one can at a time as needed. Less than five pounds of material was used during 2009.

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

Time Period Covered by Compliance Certification:

01/01/09 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:<br><br>PO1399PC2 – Condition No. 1<br>Rule 26 | Description:<br>The annual amount of landfill gas combusted in the flare shall not exceed 711,000 million BTUs (MMBTU) per year. Landfill gas may be burned in either flare or in both flares simultaneously. |
|---|---|

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.

4,418 MMBTU was consumed in Flare #2 during 2009. The limit established for the flare is 350,000 MMBTU's. Gas consumption is recorded by a totalizer. This facility is in compliance.

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

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

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09

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**Applicable Requirement or Part 70 Permit Condition**

|   |  |
|---|--|
| Citation, Including Attachment Number and/or Permit Condition Number:<br><br>PO1399PC2 – Condition No. 2<br><br>Rule 29 | Description: The two 40.5 MMBTU/hr Sur-Lite flares shall not be operated simultaneously. Landfill gas combustion records required by Condition No.1 shall be used to demonstrate compliance with this condition. |
|---|--|

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.

4,418 MMBTU was consumed in Flare #2 during 2009. The two 40.5 Sur-Lite flares were not operated simultaneously. This facility is in compliance.

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

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

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09

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**Applicable Requirement or Part 70 Permit Condition**

|   |                                 |
|---|---------------------------------|
| Citation, Including Attachment Number and/or Permit Condition Number:<br><br>PO1399PC2 – Condition No. 3<br><br>Rule 26 | Description: Flare BACT Limits. |
|---|---------------------------------|

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

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

The Flares are equipped with a temperature recording device. 4,418 MMBTU was consumed in Flare #2 during 2009. Source Test monitoring is attached in the Summary of Test Results, November 16, 2006.

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

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

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09

5.0 SUMMARY OF RESULTS

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

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

Notes:

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

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

## 5.0 SUMMARY OF RESULTS (Continued)

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

| Parameter  | INLET     |            |           |         | EXHAUST   |            |           |         |
|--|-----------|------------|-----------|---------|-----------|------------|-----------|---------|
|  | First Run | Second Run | Third Run | Average | First Run | Second Run | Third Run | Average |
| O <sub>2</sub> , %                                   | 7.65      | 7.57       | 7.78      | 7.67    | 11.31     | 11.48      | 11.81     | 11.53   |
| CO <sub>2</sub> , %                                  | 20.3      | 20.3       | 20.0      | 20.2    | 8.22      | 8.06       | 7.70      | 7.99    |
| N <sub>2</sub> , %                                   | 43.4      | 42.9       | 43.8      | 43.4    | 80.5      | 80.5       | 80.5      | 80.5    |
| H <sub>2</sub> O, %                                  | 5.9       | 7.8        | 5.7       | 6.47    | 8.00      | 4.73       | 7.63      | 6.79    |
| Flow Rate, wscfm                                     | 1,484.6   | 1,487.7    | 1,477.7   | 1,483.3 | 9,976     | 9,704      | 9,865     | 9,849   |
| Flow Rate, dscfm                                     | 1,397.0   | 1,371.7    | 1,393.5   | 1387    | 3,911     | 9,178      | 9,246     | 9,112   |
| Temperature, °F                                      | 123.0     | 125.0      | 124.0     | 124.7   | 1,474     | 1,454      | 1,459     | 1,462   |
| Btu/scf  | 275       | 277        | 273       | 275     |           |            |           |         |
| MMBtu/Hr   | 24.50     | 24.73      | 24.12     | 24.45   |           |            |           |         |
| NO <sub>x</sub> :                                    |           |            |           |         |           |            |           |         |
| ppm  |           |            |           |         |           |            |           |         |
| ppm @ 3% O <sub>2</sub>                              |           |            |           |         | 9.26      | 10.09      | 9.40      | 9.58    |
| lb/hr (as NO <sub>x</sub> )                          |           |            |           |         | 17.3      | 19.2       | 18.5      | 18.3    |
| lb/MM Btu (as NO <sub>x</sub> )                      |           |            |           |         | 0.59      | 0.66       | 0.62      | 0.62    |
|  |           |            |           |         | 0.024     | 0.027      | 0.026     | 0.026   |
| CO <sub>1</sub> <sup>(1)</sup>                       |           |            |           |         |           |            |           |         |
| ppm  |           |            |           |         |           |            |           |         |
| ppm @ 3% O <sub>2</sub>                              |           |            |           |         | 20.0      | 20.0       | 20.0      | 20.0    |
| lb/hr  |           |            |           |         | 37.3      | 38.0       | 39.4      | 38.2    |
| lb/MM Btu  |           |            |           |         | 0.775     | 0.798      | 0.804     | 0.792   |
|  |           |            |           |         | 0.032     | 0.032      | 0.033     | 0.032   |
| Hydrocarbons:  |           |            |           |         |           |            |           |         |
| CH <sub>4</sub> , ppm                                | 310,000   | 269,000    | 268,000   | 249,000 | < 1       | < 1        | < 1       | < 1     |
| Ethane, ppm  | 7.59      | 5.92       | 7.19      | 6.90    | < 1       | < 1        | < 1       | < 1     |
| TGNMIO, ppm (as CH <sub>4</sub> )                    | 660       | 849        | 873       | 794     | < 16.8    | < 5.86     | < 4.21    | < 8.96  |
| TGNMIO, lb/hr (as CH <sub>4</sub> )                  | 2.29      | 2.89       | 3.02      | 2.73    | < 0.37    | < 0.13     | < 0.10    | < 0.20  |
| TGNMIO, ppm (as hexane)                              | 110.0     | 141.5      | 145.5     | 132.3   | < 2.80    | < 0.98     | < 0.70    | < 1.49  |
| TGNMIO, ppm @ 3% O <sub>2</sub> (as hexane)          | 148.6     | 190.0      | 198.5     | 179.0   | < 5.22    | < 1.86     | < 1.38    | < 2.82  |
| TGNMIO, lb/hr (as hexane)                            | 2.05      | 2.59       | 2.71      | 2.45    | < 0.33    | < 0.12     | < 0.09    | < 0.18  |
| Destruction Eff, %                                   |           |            |           |         | > 83.76   | > 95.38    | > 96.46   | > 91.87 |
| Sulfur Compounds:                                    |           |            |           |         |           |            |           |         |
| H <sub>2</sub> S, ppm                                | 4.00      | 3.18       | 3.04      | 3.41    |           |            |           |         |
| Carbonyl Sulfide, ppm                                | < 0.2     | < 0.2      | < 0.2     | < 0.2   |           |            |           |         |
| Methyl Mercaptan, ppm                                | < 0.2     | < 0.2      | < 0.2     | < 0.2   |           |            |           |         |
| Ethyl Mercaptan, ppm                                 | < 0.2     | < 0.2      | < 0.2     | < 0.2   |           |            |           |         |
| Dimethyl Sulfide, ppm                                | < 0.2     | < 0.2      | < 0.2     | < 0.2   |           |            |           |         |
| Carbon Disulfide, ppm                                | < 0.1     | < 0.1      | < 0.1     | < 0.1   |           |            |           |         |
| isopropyl mercaptan, ppm                             | < 0.1     | < 0.1      | < 0.1     | < 0.1   |           |            |           |         |
| n-propyl mercaptan, ppm                              | < 0.1     | < 0.1      | < 0.1     | < 0.1   |           |            |           |         |
| Dimethyl Disulfide, ppm                              | < 0.1     | < 0.1      | < 0.1     | < 0.1   |           |            |           |         |
| Total Sulfur Compounds,                              |           |            |           |         |           |            |           |         |
| Total Reduced Sulfur Inlet, ppm                      | 4.00      | 3.18       | 3.04      | 3.41    |           |            |           |         |
| SO <sub>x</sub> Exhaust, lb/hr (as SO <sub>2</sub> ) |           |            |           |         | 0.036     | 0.043      | 0.042     | 0.047   |

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

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

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**Applicable Requirement or Part 70 Permit Condition**

|   |  |
|---|--|
| Citation, including Attachment Number and/or Permit Condition Number: | Description: Rule 54, Sulfur Compounds |
| PO1339PC2<br>Condition No. 4  |  |

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.

Source Test monitoring for Flare #2 is attached in the Summary of Test Results, November 16, 2006.

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if 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.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09

5.0 SUMMARY OF RESULTS

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

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

Notes:

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

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



5.0 SUMMARY OF RESULTS (Continued)

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

| Parameter  | INLET     |            |           |         | EXHAUST   |            |           |         |
|--|-----------|------------|-----------|---------|-----------|------------|-----------|---------|
|  | First Run | Second Run | Third Run | Average | First Run | Second Run | Third Run | Average |
| O <sub>2</sub> , %                                   | 7.65      | 7.57       | 7.78      | 7.67    | 11.31     | 11.48      | 11.81     | 11.53   |
| CO <sub>2</sub> , %                                  | 20.3      | 20.3       | 20.0      | 20.2    | 8.22      | 8.06       | 7.70      | 7.99    |
| N <sub>2</sub> , %                                   | 43.4      | 42.9       | 43.8      | 43.4    | 80.5      | 80.5       | 80.5      | 80.5    |
| H <sub>2</sub> O, %                                  | 5.9       | 7.8        | 5.7       | 6.47    | 8.00      | 4.73       | 7.63      | 6.79    |
| Flow Rate, wscfm                                     | 1,484.6   | 1,187.7    | 1,477.7   | 1,483.3 | 9,976     | 9,704      | 9,865     | 9,849   |
| Flow Rate, dscfm                                     | 1,397.0   | 1,371.7    | 1,393.5   | 1387    | 3,911     | 9,178      | 9,246     | 9,112   |
| Temperature, °F                                      | 123.0     | 125.0      | 124.0     | 124.7   | 1,474     | 1,454      | 1,459     | 1,462   |
| Btu/scf  | 275       | 277        | 273       | 275     |           |            |           |         |
| MMBtu/Hr   | 24.50     | 24.73      | 24.12     | 24.45   |           |            |           |         |
| NO <sub>x</sub> :                                    |           |            |           |         |           |            |           |         |
| ppm  |           |            |           |         |           |            |           |         |
| ppm @ 3% O <sub>2</sub>                              |           |            |           |         | 9.26      | 10.09      | 9.40      | 9.58    |
| lb/hr (as NO <sub>x</sub> )                          |           |            |           |         | 17.3      | 19.2       | 18.5      | 18.3    |
| lb/MM Btu (as NO <sub>x</sub> )                      |           |            |           |         | 0.59      | 0.66       | 0.62      | 0.62    |
|  |           |            |           |         | 0.024     | 0.027      | 0.026     | 0.026   |
| CO <sub>1</sub> <sup>(1)</sup>                       |           |            |           |         |           |            |           |         |
| ppm  |           |            |           |         |           |            |           |         |
| ppm @ 3% O <sub>2</sub>                              |           |            |           |         | 20.0      | 20.0       | 20.0      | 20.0    |
| lb/hr  |           |            |           |         | 37.3      | 38.0       | 39.4      | 38.2    |
| lb/MM Btu  |           |            |           |         | 0.775     | 0.798      | 0.804     | 0.792   |
|  |           |            |           |         | 0.032     | 0.032      | 0.033     | 0.032   |
| Hydrocarbons:  |           |            |           |         |           |            |           |         |
| CH <sub>4</sub> , ppm                                | 210,000   | 269,000    | 268,000   | 249,000 | < 1       | < 1        | < 1       | < 1     |
| Ethane, ppm  | 7.59      | 5.92       | 7.19      | 6.90    | < 1       | < 1        | < 1       | < 1     |
| TGNMIO, ppm (as CH <sub>4</sub> )                    | 660       | 849        | 873       | 794     | < 16.8    | < 5.86     | < 4.21    | < 8.96  |
| TGNMIO, lb/hr (as CH <sub>4</sub> )                  | 2.29      | 2.89       | 3.02      | 2.73    | < 0.37    | < 0.13     | < 0.10    | < 0.20  |
| TGNMIO, ppm (as hexane)                              | 110.0     | 141.5      | 145.5     | 132.3   | < 2.80    | < 0.98     | < 0.70    | < 1.49  |
| TGNMIO, ppm @ 3% O <sub>2</sub> (as hexane)          | 148.6     | 190.0      | 198.5     | 179.0   | < 5.22    | < 1.86     | < 1.38    | < 2.82  |
| TGNMIO, lb/hr (as hexane)                            | 2.05      | 2.59       | 2.71      | 2.45    | < 0.33    | < 0.12     | < 0.09    | < 0.18  |
| Destruction Eff. %                                   |           |            |           |         | > 83.76   | > 95.38    | > 96.46   | > 91.87 |
| Sulfur Compounds:                                    |           |            |           |         |           |            |           |         |
| H <sub>2</sub> S, ppm                                | 4.00      | 3.18       | 3.04      | 3.41    |           |            |           |         |
| Carbonyl Sulfide, ppm                                | < 0.2     | < 0.2      | < 0.2     | < 0.2   |           |            |           |         |
| Methyl Mercaptan, ppm                                | < 0.2     | < 0.2      | < 0.2     | < 0.2   |           |            |           |         |
| Ethyl Mercaptan, ppm                                 | < 0.2     | < 0.2      | < 0.2     | < 0.2   |           |            |           |         |
| Dimethyl Sulfide, ppm                                | < 0.2     | < 0.2      | < 0.2     | < 0.2   |           |            |           |         |
| Carbon Disulfide, ppm                                | < 0.1     | < 0.1      | < 0.1     | < 0.1   |           |            |           |         |
| Isopropyl mercaptan, ppm                             | < 0.1     | < 0.1      | < 0.1     | < 0.1   |           |            |           |         |
| n-propyl mercaptan, ppm                              | < 0.1     | < 0.1      | < 0.1     | < 0.1   |           |            |           |         |
| Dimethyl Disulfide, ppm                              | < 0.1     | < 0.1      | < 0.1     | < 0.1   |           |            |           |         |
| Total Sulfur Compounds,                              |           |            |           |         |           |            |           |         |
| Total Reduced Sulfur Inlet, ppm                      | 4.00      | 3.18       | 3.04      | 3.41    |           |            |           |         |
| SO <sub>x</sub> Exhaust, lb/hr (as SO <sub>2</sub> ) |           |            |           |         | 0.036     | 0.043      | 0.042     | 0.047   |

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

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

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**Applicable Requirement or Part 70 Permit Condition**

|   |  |
|---|--|
| Citation, Including Attachment Number and/or Permit Condition Number:<br><br>PO1399PC2 – Condition No. 5<br>Rule 57.1 | Description: <b>Rule 57.1, Particulate Matter Emissions from Fuel Burning Equipment.</b> |
|---|--|

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

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

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

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

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

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09

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**Applicable Requirement or Part 70 Permit Condition**

|   |  |
|---|--|
| Citation, Including Attachment Number and/or Permit Condition Number:<br><br>PO1399PC2 – Condition No. 6<br><br>Rule 26 | Description: <b>Rule 26, Flare Equipment Requirements.</b> |
|---|--|

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

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

Each flare shall be equipped with controllers that monitor for flame failure. This flame failure shall initiate isolation of the landfill gas supply line from the flare and the atmosphere by closing the isolation valve. Upon closing of the isolation valve, an alarm shall be activated to notify the operator of a system malfunction. In addition, the system shall be designed to automatically relight the flare should a flame failure occur. Upon the relighting of the flare, the isolation valve shall reopen to continue destruction of the landfill gas.

These systems are in place and are operating. Function checks were conducted on December 17, 2009.

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

Time Period Covered by Compliance Certification:

01/01/09 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:<br><br>PO1399PC2 – Condition No. 7<br><br>Rule 26 | Description: <b>Calibration Requirements.</b> |
|---|---|

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.

Function checks were performed monthly in 2009. Flare #2 was operated for calibration of the control and recording of inlet gas flow and exhaust temperature of the flares.

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

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

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09

# **FCI** FLUID COMPONENTS INTERNATIONAL LLC

## FIELD SERVICE REPORT 2494

**REPORT DATE:** 12/23/2009

**SERVICE DATE(S):** 12/21/2009

**FIELD ENGINEER** Ransom Thompson

**CUSTOMER:** Ventura Regional Sanitation District  
**ADDRESS:** Coastal LF, 405 W. Gonzales Rd.

**CONTACT:** David Gooding  
**PHONE:** 805 207-2207

**FCI REPRESENTATIVE:** Ponton Industries, Ralph Pettifer  
**PHONE:** 714 348-9073 **FAX:** 714 348-9083

**FCI MODEL #s GF90**

**WARRANTY SERVICE**

**NON-WARRANTY SERVICE**

### PROJECT SUMMARY

Ventura Regional Sanitation District is responsible for operation of a collection of landfills in Oxnard that share a common flare. The landfills flare through a GF90. VRSD employee David Gooding requested FCI to verify calibration of the flare meter as it has not been recently tested.

### REASON FOR FIELD SERVICE

Biannual verification of calibration.

### SERVICE PERFORMED

**INSTRUMENT DESCRIPTION:** GF90, SN. 181922

#### AS FOUND STATUS:

|                               |          |                       |
|-------------------------------|----------|-----------------------|
| <b>Sensor Element</b>         | Verified |                       |
| <b>Transmitter</b>            | Verified |                       |
| <b>Wiring</b>                 | Verified |                       |
| <b>Calibration</b>            | Verified | 0-3000 SCFM, 9.489"ID |
| <b>Process / Installation</b> | Verified | Side mount            |
| <b>Other</b>                  | Verified |                       |



*CORRECTIVE ACTION: Found K enabled and set to 1.35 or 35% boost in reading, reset to 1.0 and traversed line. As left k = 0.987. Meter certified calibrated by FCI 12/21/2009.*

|  |
|--|
| <b>AS LEFT CONDITION / CONCLUSIONS / RECOMMENDATIONS</b> |
|--|

Meter left in normal operation, with K factor enabled and set for 1.3% cut in reading. Customer wishes verification to coincide with any other service visits in the general area.

# OTHER INFORMATION

SN181992 90% open valve

date:12/21/09

| Traverse Point # | Distance into pipe Inches | HDeltaP         |                 | VDeltaP         |                 | Temp Deg F  | Press Psia   | SCFM           |
|------------------|---------------------------|-----------------|-----------------|-----------------|-----------------|---|--------------|----------------|
|                  |                           | Inches of Water | Sq Root Delta P | Inches of Water | Sq Root Delta P |   |              |                |
| 1                | 0.31                      | 0.550           | 0.742           | 0.350           | 0.592           | 1350  | 14.72        | 1120.00        |
| 2                | 1.00                      | 0.600           | 0.775           | 0.550           | 0.742           |   |              |                |
| 3                | 1.84                      | 0.620           | 0.787           | 0.550           | 0.742           | These readings taken immediately before and after traverse readings are recorded. |              |                |
| 4                | 3.06                      | 0.600           | 0.775           | 0.550           | 0.742           |   |              |                |
| 5                | 6.42                      | 0.500           | 0.707           | 0.550           | 0.742           |   |              |                |
| 6                | 7.68                      | 0.500           | 0.707           | 0.500           | 0.707           |   |              |                |
| 7                | 8.49                      | 0.450           | 0.671           | 0.500           | 0.707           |   |              |                |
| 8                | 9.18                      | 0.400           | 0.632           | 0.500           | 0.707           | 1310  |              | 1140.00        |
|                  |                           | <b>0.53</b>     | <b>0.72</b>     | <b>0.51</b>     | <b>0.71</b>     | <b>1330</b>   | <b>14.72</b> | <b>1130.00</b> |

**Stack Data:**  
 Line Size (inches) 9.489  
 Average Sq Rt. Delta P. 0.72  
 Pitot K Factor: 0.86  
 Molecular Weight: 28.1570  
 Kp 85.49  
 Absolute Temperature, Deg R 592.69  
 Pipe Area, Sq ft 0.4911  
 Absolute Pressure, Inches of Hg: 29.98  
 Density, LBM/Cubic FT: 0.0650

**Traverse results:**  
 Velocity, ft/sec 44.19  
 ACFM 1301.98  
**SFPS 39.55**  
 SCFM 1165.41  
 LBM/HR 4545.79

Meter K factor = 1.0313  
 As Found Meter K factor = 1.00  
 New K = 1.08

SN181992 50%open valve

date:12/21/09

| Traverse Point # | Distance into pipe Inches | HDelta P        |                  | VDelta P        |                  | Temp Deg F | Press. Psia | SCFM   |
|------------------|---------------------------|-----------------|------------------|-----------------|------------------|------------|-------------|--------|
|                  |                           | Inches of Water | Sq. Root Delta P | Inches of Water | Sq. Root Delta P |            |             |        |
| 1                | 0.31                      | 0.300           | 0.548            | 0.270           | 0.520            | 135.0      | 14.71       | 917.00 |
| 2                | 1.00                      | 0.350           | 0.592            | 0.280           | 0.529            |            |             |        |
| 3                | 1.84                      | 0.360           | 0.600            | 0.300           | 0.548            |            |             |        |
| 4                | 3.06                      | 0.350           | 0.592            | 0.300           | 0.548            |            |             |        |
| 5                | 6.42                      | 0.300           | 0.548            | 0.350           | 0.592            |            |             |        |
| 6                | 7.68                      | 0.320           | 0.566            | 0.350           | 0.592            |            |             |        |
| 7                | 8.49                      | 0.300           | 0.548            | 0.350           | 0.592            |            |             |        |
| 8                | 9.18                      | 0.270           | 0.520            | 0.350           | 0.592            | 131.0      |             | 917.00 |
|                  |                           | 0.32            | 0.56             | 0.32            | 0.56             | 133.0      | 14.71       | 917.00 |

Stack Data:

Line Size:(inches) 9.489  
 Average Sq.Rt. Delta P: 0.56  
 Pitot K Factor: 0.86  
 Molecular Weight: 28.1570  
 Kp: 85.49  
 Absolute Temperature, Deg R: 592.69  
 Pipe Area, Sq. ft: 0.4911  
 Absolute Pressure, Inches of Hg: 29.95  
 Density, LBM/Cubic FT: 0.0650

Traverse results:

Velocity, ft/sec: 34.75  
 ACFM: 1024.06  
**SFPS: 31.09**  
 SCFM: 915.97  
 LBM/HR: 3572.83

Meter K factor = 0.9989  
 As Found Meter K factor = 1.00  
 New K = 1.00

SN181992 25%open valve

date:12/21/09

| Traverse Point # | Distance into pipe Inches | HDelta P        |                  | VDelta P        |                  | Temp Deg F | Press. Psia | SCFM   |
|------------------|---------------------------|-----------------|------------------|-----------------|------------------|------------|-------------|--------|
|                  |                           | Inches of Water | Sq. Root Delta P | Inches of Water | Sq. Root Delta P |            |             |        |
| 1                | 0.31                      | 0.055           | 0.235            | 0.060           | 0.245            | 135.0      | 14.71       | 507.00 |
| 2                | 1.00                      | 0.056           | 0.238            | 0.055           | 0.232            |            |             |        |
| 3                | 1.84                      | 0.094           | 0.307            | 0.100           | 0.316            |            |             |        |
| 4                | 3.06                      | 0.095           | 0.308            | 0.110           | 0.332            |            |             |        |
| 5                | 6.42                      | 0.100           | 0.316            | 0.110           | 0.332            |            |             |        |
| 6                | 7.68                      | 0.120           | 0.346            | 0.110           | 0.332            |            |             |        |
| 7                | 8.49                      | 0.125           | 0.354            | 0.115           | 0.339            |            |             |        |
| 8                | 9.18                      | 0.125           | 0.354            | 0.130           | 0.361            | 135.0      |             | 500.00 |
|                  |                           | 0.10            | 0.31             | 0.10            | 0.32             | 135.0      | 14.71       | 518.50 |

Stack Data:

Line Size:(inches) 9.489  
 Average Sq.Rt. Delta P: 0.32  
 Pitot K Factor: 0.86  
 Molecular Weight: 28.3300  
 Kp: 85.49  
 Absolute Temperature, Deg R: 594.69  
 Pipe Area, Sq. ft: 0.4911  
 Absolute Pressure, Inches of Hg: 29.95  
 Density, LBM/Cubic FT: 0.0733

Traverse results:

Velocity, ft/sec: 19.46  
 ACFM: 573.51  
**SFPS: 17.35**  
 SCFM: 511.24  
 LBM/HR: 2248.43

Meter K factor = 0.9860  
 As Found Meter K factor = 1.00  
 New K = 0.99

|   |          |
|---|----------|
| <b>Purchase Order # for Field Service</b> | PO000253 |
| <b>Serial Number(s)</b>                   | 181992   |
| <b>Shop Order Number(s)</b>               | C002754  |
| <b>Field Notebook Number</b>              | CS118    |
| <b>Total Hours on Job Site</b>            | 4        |

**COPY TO:**

|                   |                               |
|-------------------|-------------------------------|
| Jay Hosfield      | Customer Service Manager, FCI |
| Glen Fishman      | Director of Marketing, FCI    |
| Steve Cox         | Regional Sales Manager, FCI   |
| Ponton Industries | Local FCI Representative      |
|                   |                               |
|                   |                               |

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**Applicable Requirement or Part 70 Permit Condition**

|   |  |
|---|--|
| Citation, Including Attachment Number and/or Permit Condition Number:<br><br>PO1399PC2 – Condition No. 8<br><br>Rule 26 | Description: Landfill Gas Control Requirements During Maintenance. |
|---|--|

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

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

There were no instances of maintenance shutdown during this reporting period that exceeded eight hours where all of the gas could not be consumed in the engines or the flares.

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

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

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09

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**Applicable Requirement or Part 70 Permit Condition**

|  |   |
|--|---|
| Citation, Including Attachment Number and/or Permit Condition Number:<br><br>PO1399PC2 – Condition No. 9 & 10<br><br>Rule 51 | Description: Condition Nos. 9 & 10, Rule 51 - Toxics testing of both flares every 1000 hours, but not less than 10 years and not more than 4 years. |
|--|---|

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.

Source testing for Flare #2 was conducted November 16, 2006. The complete report is on file with the VCAPCD. Flare #1 was source tested for Toxics in 2000.

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

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09



5.0 SUMMARY OF RESULTS

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

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

Notes:

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

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

## 5.0 SUMMARY OF RESULTS (Continued)

TABLE 5-1  
GENERAL RESULTS  
VRSD- Coastal Flares  
Flare #2  
November 16, 2006

| Parameter  | INLET     |            |           |         | EXHAUST   |            |           |         |
|--|-----------|------------|-----------|---------|-----------|------------|-----------|---------|
|  | First Run | Second Run | Third Run | Average | First Run | Second Run | Third Run | Average |
| O <sub>2</sub> , %                                   | 7.65      | 7.57       | 7.78      | 7.67    | 11.31     | 11.48      | 11.81     | 11.53   |
| CO <sub>2</sub> , %                                  | 20.3      | 20.3       | 20.0      | 20.2    | 8.22      | 8.06       | 7.70      | 7.99    |
| N <sub>2</sub> , %                                   | 43.4      | 42.9       | 43.8      | 43.4    | 80.5      | 80.5       | 80.5      | 80.5    |
| H <sub>2</sub> O, %                                  | 5.9       | 7.8        | 5.7       | 6.47    | 8.00      | 4.73       | 7.63      | 6.79    |
| Flow Rate, wscfm                                     | 1,484.6   | 1,487.7    | 1,477.7   | 1,483.3 | 9,976     | 9,704      | 9,865     | 9,849   |
| Flow Rate, dscfm                                     | 1,397.0   | 1,371.7    | 1,393.5   | 1387    | 3,911     | 9,178      | 9,246     | 9,112   |
| Temperature, °F                                      | 123.0     | 125.0      | 124.0     | 124.7   | 1,474     | 1,454      | 1,459     | 1,462   |
| Dtu/scf  | 275       | 277        | 273       | 275     |           |            |           |         |
| MMBtu/hr   | 24.50     | 24.73      | 24.12     | 24.45   |           |            |           |         |
| <b>NO<sub>x</sub>:</b>                               |           |            |           |         |           |            |           |         |
| ppm  |           |            |           |         |           |            |           |         |
| ppm @ 3% O <sub>2</sub>                              |           |            |           |         | 9.26      | 10.09      | 9.40      | 9.58    |
| lb/hr (as NO <sub>x</sub> )                          |           |            |           |         | 17.3      | 19.2       | 18.5      | 18.3    |
| lb/MM Btu (as NO <sub>x</sub> )                      |           |            |           |         | 0.59      | 0.66       | 0.62      | 0.62    |
|  |           |            |           |         | 0.024     | 0.027      | 0.026     | 0.026   |
| <b>CO: <sup>(1)</sup></b>                            |           |            |           |         |           |            |           |         |
| ppm  |           |            |           |         |           |            |           |         |
| ppm @ 3% O <sub>2</sub>                              |           |            |           |         | 20.0      | 20.0       | 20.0      | 20.0    |
| lb/hr  |           |            |           |         | 37.3      | 38.0       | 39.4      | 38.2    |
| lb/MM Btu  |           |            |           |         | 0.775     | 0.798      | 0.804     | 0.792   |
|  |           |            |           |         | 0.032     | 0.032      | 0.033     | 0.032   |
| <b>Hydrocarbons:</b>                                 |           |            |           |         |           |            |           |         |
| CH <sub>4</sub> , ppm                                | 210,000   | 269,000    | 268,000   | 249,000 | < 1       | < 1        | < 1       | < 1     |
| Ethane, ppm  | 7.59      | 5.92       | 7.19      | 6.90    | < 1       | < 1        | < 1       | < 1     |
| TGNMIO, ppm (as CH <sub>4</sub> )                    | 660       | 849        | 873       | 794     | < 16.8    | < 5.86     | < 4.21    | < 8.96  |
| TGNMIO, lb/hr (as CH <sub>4</sub> )                  | 2.29      | 2.89       | 3.02      | 2.73    | < 0.37    | < 0.13     | < 0.10    | < 0.20  |
| TGNMIO, ppm (as hexane)                              | 110.0     | 141.5      | 145.5     | 132.3   | < 2.80    | < 0.98     | < 0.70    | < 1.49  |
| TGNMIO, ppm @ 3% O <sub>2</sub> (as hexane)          | 148.6     | 190.0      | 198.5     | 179.0   | < 5.22    | < 1.86     | < 1.38    | < 2.82  |
| TGNMIO, lb/hr (as hexane)                            | 2.05      | 2.59       | 2.71      | 2.45    | < 0.33    | < 0.12     | < 0.09    | < 0.18  |
| Destruction Eff. %                                   |           |            |           |         | > 83.76   | > 95.38    | > 96.46   | > 91.87 |
| <b>Sulfur Compounds:</b>                             |           |            |           |         |           |            |           |         |
| H <sub>2</sub> S, ppm                                | 4.00      | 3.18       | 3.04      | 3.41    |           |            |           |         |
| Carbonyl Sulfide, ppm                                | < 0.2     | < 0.2      | < 0.2     | < 0.2   |           |            |           |         |
| Methyl Mercaptan, ppm                                | < 0.2     | < 0.2      | < 0.2     | < 0.2   |           |            |           |         |
| Ethyl Mercaptan, ppm                                 | < 0.2     | < 0.2      | < 0.2     | < 0.2   |           |            |           |         |
| Dimethyl Sulfide, ppm                                | < 0.2     | < 0.2      | < 0.2     | < 0.2   |           |            |           |         |
| Carbon Disulfide, ppm                                | < 0.1     | < 0.1      | < 0.1     | < 0.1   |           |            |           |         |
| Isopropyl mercaptan, ppm                             | < 0.1     | < 0.1      | < 0.1     | < 0.1   |           |            |           |         |
| n-propyl mercaptan, ppm                              | < 0.1     | < 0.1      | < 0.1     | < 0.1   |           |            |           |         |
| Dimethyl Disulfide, ppm                              | < 0.1     | < 0.1      | < 0.1     | < 0.1   |           |            |           |         |
| Total Sulfur Compounds,                              |           |            |           |         |           |            |           |         |
| Total Reduced Sulfur Inlet, ppm                      | 4.00      | 3.18       | 3.04      | 3.41    |           |            |           |         |
| SO <sub>x</sub> Exhaust, lb/hr (as SO <sub>2</sub> ) |           |            |           |         | 0.056     | 0.043      | 0.042     | 0.047   |

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

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

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:<br><br>Condition No. 50 | Description: Rule 50, Opacity. |
|---|--------------------------------|

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.

Flare #1 was not operated in 2009 and Flare #2 was operated for 290.5 hours in 2009. The VCAPCD Rule 50 Opacity Annual Compliance Survey was performed on December 21, 2009 (See attached).

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

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

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09

**VCAPCD Rule 50, Opacity  
Annual Compliance Survey**

Survey Information:

By: Jason Siegert  
Date: December 21, 2009  
Time: 9:30 AM to 10:00 AM  
Emissions Unit: Oxnard Landfills Flare #2

Verification: On the above date I observed no visible emissions (including uncombined water) greater than zero percent for a period or periods aggregating more than three (3) minutes during the time observed (0.5 hour).



JASON SIEGERT – SOURCE CONTROL INSPECTOR

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:<br><br>Condition No. 54.B.1 | Description: Rule 54.B.1, Sulfur Compounds. |
|---|---|

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

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

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

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

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

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09

**VENTURA COUNTY  
AIR POLLUTION CONTROL DISTRICT**  
Memorandum

TO: Interested Parties

DATE: December 9, 1997

FROM: John Harader

SUBJECT: SOx Rule Comparison for combustion  
Rule 54, "Sulfur Compounds"  
Rule 64, "Sulfur Content of Fuels"

The District rules that directly limit SOx emissions from combustion emissions are Rules 54 and 64. Rule 54.B.1 limits sulfur dioxide emission concentrations at the point of discharge and Rule 64.B limits the sulfur compound content of the combustion fuel.

Rule 54.B.1 limits SOx emissions from any combustion operation at the point of discharge to 300 ppm by volume calculated as SO<sub>2</sub>. The natural gas emission factor that results in 300 ppmv SOx is 532 lb SOx per mmcf natural gas. This was calculated with an assumption of 3 percent oxygen. The diesel fuel emission factor that results in 300 ppmv SOx is 229 lb SOx per thousand gallons fuel at 15 percent oxygen, and 75 lb SOx per thousand gallons fuel at 3 percent oxygen.

Rule 64.B.1 limits the sulfur compound content of gaseous fuel. The limit for PUC natural gas is 15 grains sulfur compounds calculated as hydrogen sulfide per 100 cubic feet gas (or 236 ppmv). This fuel limit reduces to an emission factor of 40.3 lb SOx per mmcf natural gas. The fuel limit for gaseous fuel other than PUC natural gas is 50 grains sulfur compounds (calculated as H<sub>2</sub>S) per 100 cubic feet gas (or 788 ppmv). This fuel limit reduces to an emission factor of 134.5 lb SOx per mmcf natural gas.

Rule 64.B.2 limits the sulfur compound content of solid or liquid fuels to 0.5 percent by weight. This fuel limit reduces to an emission factor of 72 lb SOx per thousand gallons diesel fuel.

Therefore, the SOx rules for combustion, in the order of the most stringent are:

Gaseous fuel

| Rule                | Limit                | Natural gas emission factor, lb/mmcf |
|---------------------|----------------------|--------------------------------------|
| 64.B.1, PUC gas     | 15 grains S / 100 cf | 40.3                                 |
| 64.B.1, non-PUC gas | 50 grains S / 100 cf | 134.5                                |
| 54.B.1              | 300 ppmv             | 531.6 (@ 3% O <sub>2</sub> )         |



Liquid fuel

| Rule   | Limit         | Diesel fuel emission factor, lb/Mgal |
|--------|---------------|--------------------------------------|
| 64.B.2 | 0.5 % S by wt | 72.0                                 |
| 54.B.1 | 300 ppmv      | 75.3 (@ 3% O2)                       |
| 54.B.1 | 300 ppmv      | 228.5 (@ 15% O2)                     |

m:\title\soxrules

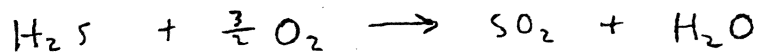
SO<sub>x</sub> RULE COMPARISON FOR COMBUSTION OF GASEOUS FUELRULE 54.B.1SO<sub>x</sub> EXHAUST ≤ 300 ppm v CALCULATED AS SO<sub>2</sub>

$$\left(8740 \frac{\text{DSCF}}{\text{MMBTU}}\right) \left(\frac{64 \text{ lb SO}_2}{\text{lb mole}}\right) \left(\frac{\text{lb mole}}{387 \text{ CF}}\right) \left(\frac{20.9}{20.9-15}\right) \left(\frac{300 \text{ ppm}}{10^6}\right) \left(\frac{1050 \text{ MMBTU}}{\text{MMCF}}\right) = 1612.8 \frac{\text{lb SO}_x}{\text{MMCF}}$$

$$\text{at } P_0 O_2 \Rightarrow \boxed{531.6 \frac{\text{lb SO}_x}{\text{MMCF}}}$$

RULE 64.B.1PUC NATURAL GAS SULFUR CONTENT SHALL NOT EXCEED 15 GRAINS / 100 CF (236 ppmv) CALCULATED AS H<sub>2</sub>S.

$$\left(\frac{15 \text{ GRAINS}}{100 \text{ CF}}\right) \left(\frac{\text{lb}}{7000 \text{ GRAINS}}\right) \left(\frac{1 \times 10^6 \text{ CF}}{\text{MMCF}}\right) = 21.43 \text{ lb H}_2\text{S} / \text{MMCF}$$



$$\left(\frac{21.43 \text{ lb H}_2\text{S}}{\text{MMCF}}\right) \left(\frac{\text{lb mole H}_2\text{S}}{34 \text{ lb H}_2\text{S}}\right) \left(\frac{\text{lb mole SO}_2}{\text{lb mole H}_2\text{S}}\right) \left(\frac{64 \text{ lb SO}_2}{\text{lb mole SO}_2}\right) = \boxed{40.3 \frac{\text{lb SO}_x}{\text{MMCF}}}$$

GASEOUS FUEL THAT IS NOT PUC NATURAL GAS SHALL NOT EXCEED A SULFUR CONTENT OF 50 GRAINS / 100 CF (788 ppmv) CALCULATED AS H<sub>2</sub>S.

USING SAME CALCULATION METHOD AS ABOVE ⇒

$$\boxed{134.5 \frac{\text{lb SO}_x}{\text{MMCF}}}$$

JH 12/2/97



SO<sub>x</sub> RULE COMPARISON FOR COMBUSTION OF LIQUID FUELSRULE 54.B.1SO<sub>x</sub> EXHAUST ≤ 300ppm CALCULATED AT SO<sub>2</sub>DIESEL FUEL, 15% O<sub>2</sub>

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

$$@ 39 \text{ O}_2 = \boxed{75.3 \frac{\text{lb SO}_2}{\text{MGAL}}}$$

RULE 64.B.2SOLID OR LIQUID FUEL SHALL NOT EXCEED  
A SULFUR CONTENT OF 0.5 PERCENT, by wt.

FUEL OIL DENSITY ⇒ 7.2 lb/gal

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

JH 12/1/97

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:<br><br>Condition No. 54.B.2 | Description: Rule 54.B.2, Sulfur Dioxide. |
|---|---|

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

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

Pursuant to Rule 54.B.2, emissions of sulfur compounds, calculated as sulfur dioxide (SO<sub>2</sub>), shall not result in average ground or sea level concentrations at any point at or beyond the property line in excess of 0.25 ppmv averaged over any one hour period, or 0.04 ppmv averaged over any 24 hour period. According to the memo (attached) from Terri Thomas, 5/23/1996, Subject Rule 54.B.2 Compliance, this facility is in compliance for SO<sub>2</sub>. From the table an emission rate of 0.23 lb/hr would produce a 1-hour maximum concentration of 0.06 ppmv and a 24-hour maximum concentration of 0.03, 100 meters from the stack. Our source test (attached) showed an exhaust value for SO<sub>2</sub> of 0.05 lb/hour. This would put the flare below the limits.

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

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

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09

5.0 SUMMARY OF RESULTS

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

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

Notes:

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

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

5.0 SUMMARY OF RESULTS (Continued)

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

| Parameter  | INLET     |            |           |         | EXHAUST   |            |           |         |
|--|-----------|------------|-----------|---------|-----------|------------|-----------|---------|
|  | First Run | Second Run | Third Run | Average | First Run | Second Run | Third Run | Average |
| O <sub>2</sub> , %                                   | 7.65      | 7.57       | 7.78      | 7.67    | 11.31     | 11.48      | 11.81     | 11.53   |
| CO <sub>2</sub> , %                                  | 20.3      | 20.3       | 20.0      | 20.2    | 8.22      | 8.06       | 7.70      | 7.99    |
| N <sub>2</sub> , %                                   | 43.4      | 42.9       | 43.8      | 43.4    | 80.5      | 80.5       | 80.5      | 80.5    |
| H <sub>2</sub> O, %                                  | 5.9       | 7.8        | 5.7       | 6.47    | 8.00      | 4.73       | 7.63      | 6.79    |
| Flow Rate, wscfm                                     | 1,484.6   | 1,187.7    | 1,477.7   | 1,433.3 | 9,976     | 9,704      | 9,865     | 9,849   |
| Flow Rate, dscfm                                     | 1,397.0   | 1,371.7    | 1,393.5   | 1387    | 8,911     | 9,178      | 9,246     | 9,112   |
| Temperature, °F                                      | 123.0     | 125.0      | 124.0     | 124.7   | 1,474     | 1,454      | 1,459     | 1,462   |
| Btu/scf  | 275       | 277        | 273       | 275     |           |            |           |         |
| MMBtu/Hr   | 24.50     | 24.73      | 24.12     | 24.45   |           |            |           |         |
| NO <sub>x</sub> :                                    |           |            |           |         |           |            |           |         |
| ppm  |           |            |           |         |           |            |           |         |
| ppm @ 3% O <sub>2</sub>                              |           |            |           |         | 9.26      | 10.09      | 9.40      | 9.58    |
| lb/hr (as NO <sub>x</sub> )                          |           |            |           |         | 17.3      | 19.2       | 18.5      | 18.3    |
| lb/MM Btu (as NO <sub>x</sub> )                      |           |            |           |         | 0.39      | 0.66       | 0.62      | 0.62    |
|  |           |            |           |         | 0.024     | 0.027      | 0.026     | 0.026   |
| CO: <sup>(1)</sup>                                   |           |            |           |         |           |            |           |         |
| ppm  |           |            |           |         |           |            |           |         |
| ppm @ 3% O <sub>2</sub>                              |           |            |           |         | 20.0      | 20.0       | 20.0      | 20.0    |
| lb/hr  |           |            |           |         | 37.3      | 38.0       | 39.4      | 38.2    |
| lb/MM Btu  |           |            |           |         | 0.775     | 0.798      | 0.804     | 0.792   |
|  |           |            |           |         | 0.032     | 0.032      | 0.033     | 0.032   |
| Hydrocarbons:  |           |            |           |         |           |            |           |         |
| CH <sub>4</sub> , ppm                                | 310,000   | 269,000    | 268,000   | 249,000 | < 1       | < 1        | < 1       | < 1     |
| Ethane, ppm  | 7.59      | 5.92       | 7.19      | 6.90    | < 1       | < 1        | < 1       | < 1     |
| TGNMIO, ppm (as CH <sub>4</sub> )                    | 660       | 849        | 873       | 794     | < 16.8    | < 5.86     | < 4.21    | < 8.96  |
| TGNMIO, lb/hr (as CH <sub>4</sub> )                  | 2.29      | 2.89       | 3.02      | 2.73    | < 0.37    | < 0.13     | < 0.10    | < 0.20  |
| TGNMIO, ppm (as hexane)                              | 110.0     | 141.5      | 145.5     | 132.3   | < 2.80    | < 0.98     | < 0.70    | < 1.49  |
| TGNMIO, ppm @ 3% O <sub>2</sub> (as hexane)          | 148.6     | 190.0      | 198.5     | 179.0   | < 5.22    | < 1.86     | < 1.38    | < 2.82  |
| TGNMIO, lb/hr (as hexane)                            | 2.05      | 2.59       | 2.71      | 2.45    | < 0.33    | < 0.12     | < 0.09    | < 0.18  |
| Destruction Eff. %                                   |           |            |           |         | > 83.76   | > 95.38    | > 96.46   | > 91.87 |
| Sulfur Compounds:                                    |           |            |           |         |           |            |           |         |
| H <sub>2</sub> S, ppm                                | 4.00      | 3.18       | 3.04      | 3.41    |           |            |           |         |
| Carbonyl Sulfide, ppm                                | < 0.2     | < 0.2      | < 0.2     | < 0.2   |           |            |           |         |
| Methyl Mercaptan, ppm                                | < 0.2     | < 0.2      | < 0.2     | < 0.2   |           |            |           |         |
| Ethyl Mercaptan, ppm                                 | < 0.2     | < 0.2      | < 0.2     | < 0.2   |           |            |           |         |
| Dimethyl Sulfide, ppm                                | < 0.2     | < 0.2      | < 0.2     | < 0.2   |           |            |           |         |
| Carbon Disulfide, ppm                                | < 0.1     | < 0.1      | < 0.1     | < 0.1   |           |            |           |         |
| Isopropyl mercaptan, ppm                             | < 0.1     | < 0.1      | < 0.1     | < 0.1   |           |            |           |         |
| n-propyl mercaptan, ppm                              | < 0.1     | < 0.1      | < 0.1     | < 0.1   |           |            |           |         |
| Dimethyl Disulfide, ppm                              | < 0.1     | < 0.1      | < 0.1     | < 0.1   |           |            |           |         |
| Total Sulfur Compounds,                              |           |            |           |         |           |            |           |         |
| Total Reduced Sulfur Inlet, ppm                      | 4.00      | 3.18       | 3.04      | 3.41    |           |            |           |         |
| SO <sub>x</sub> Exhaust, lb/hr (as SO <sub>2</sub> ) |           |            |           |         | 0.056     | 0.043      | 0.042     | 0.047   |

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

<sup>(1)</sup> CO ppm values were set to 10% of the selected range (0-300 ppm).

**VENTURA COUNTY  
AIR POLLUTION CONTROL DISTRICT**  
Memorandum

TO: Interested Parties

DATE: December 9, 1997

FROM: John Harader

SUBJECT: SOx Rule Comparison for combustion  
Rule 54, "Sulfur Compounds"  
Rule 64, "Sulfur Content of Fuels"

The District rules that directly limit SOx emissions from combustion emissions are Rules 54 and 64. Rule 54.B.1 limits sulfur dioxide emission concentrations at the point of discharge and Rule 64.B limits the sulfur compound content of the combustion fuel.

Rule 54.B.1 limits SOx emissions from any combustion operation at the point of discharge to 300 ppm by volume calculated as SO<sub>2</sub>. The natural gas emission factor that results in 300 ppmv SOx is 532 lb SOx per mmcf natural gas. This was calculated with an assumption of 3 percent oxygen. The diesel fuel emission factor that results in 300 ppmv SOx is 229 lb SOx per thousand gallons fuel at 15 percent oxygen, and 75 lb SOx per thousand gallons fuel at 3 percent oxygen.

Rule 64.B.1 limits the sulfur compound content of gaseous fuel. The limit for PUC natural gas is 15 grains sulfur compounds calculated as hydrogen sulfide per 100 cubic feet gas (or 236 ppmv). This fuel limit reduces to an emission factor of 40.3 lb SOx per mmcf natural gas. The fuel limit for gaseous fuel other than PUC natural gas is 50 grains sulfur compounds (calculated as H<sub>2</sub>S) per 100 cubic feet gas (or 788 ppmv). This fuel limit reduces to an emission factor of 134.5 lb SOx per mmcf natural gas.

Rule 64.B.2 limits the sulfur compound content of solid or liquid fuels to 0.5 percent by weight. This fuel limit reduces to an emission factor of 72 lb SOx per thousand gallons diesel fuel.

Therefore, the SOx rules for combustion, in the order of the most stringent are:

Gaseous fuel

| Rule                | Limit                | Natural gas emission factor, lb/mmcf |
|---------------------|----------------------|--------------------------------------|
| 64.B.1, PUC gas     | 15 grains S / 100 cf | 40.3                                 |
| 64.B.1, non-PUC gas | 50 grains S / 100 cf | 134.5                                |
| 54.B.1              | 300 ppmv             | 531.6 (@ 3% O <sub>2</sub> )         |



Liquid fuel

| Rule   | Limit         | Diesel fuel emission factor, lb/Mgal |
|--------|---------------|--------------------------------------|
| 64.B.2 | 0.5 % S by wt | 72.0                                 |
| 54.B.1 | 300 ppmv      | 75.3 (@ 3% O2)                       |
| 54.B.1 | 300 ppmv      | 228.5 (@ 15% O2)                     |

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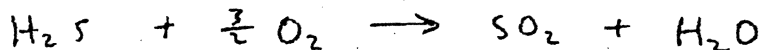
SO<sub>x</sub> RULE COMPARISON FOR COMBUSTION OF GASEOUS FUELRULE 54.B.1SO<sub>x</sub> EXHAUST ≤ 300 ppmv CALCULATED AS SO<sub>2</sub>

$$\left( \frac{8740 \text{ DSCF}}{\text{MMBTU}} \right) \left( \frac{64 \text{ lb SO}_2}{\text{lb mole}} \right) \left( \frac{\text{lb mole}}{387 \text{ CF}} \right) \left( \frac{20.9}{20.9-15} \right) \left( \frac{300 \text{ ppm}}{10^6} \right) \left( \frac{1050 \text{ MMBTU}}{\text{MMCF}} \right) = 1612.8 \frac{\text{lb SO}_x}{\text{MMCF}}$$

$$\text{@ } 7\% \text{ O}_2 \Rightarrow \boxed{531.6 \frac{\text{lb SO}_x}{\text{MMCF}}}$$

RULE 64.B.1PUC NATURAL GAS SULFUR CONTENT SHALL NOT EXCEED 15 GRAINS / 100 CF (236 ppmv) CALCULATED AS H<sub>2</sub>S.

$$\left( \frac{15 \text{ GRAINS}}{100 \text{ CF}} \right) \left( \frac{\text{lb}}{7000 \text{ GRAINS}} \right) \left( \frac{1 \times 10^6 \text{ CF}}{\text{MMCF}} \right) = 21.43 \text{ lb H}_2\text{S} / \text{MMCF}$$



$$\left( \frac{21.43 \text{ lb H}_2\text{S}}{\text{MMCF}} \right) \left( \frac{\text{lb mole H}_2\text{S}}{34 \text{ lb H}_2\text{S}} \right) \left( \frac{\text{lb mole SO}_2}{\text{lb mole H}_2\text{S}} \right) \left( \frac{64 \text{ lb SO}_2}{\text{lb mole SO}_2} \right) = \boxed{40.3 \frac{\text{lb SO}_x}{\text{MMCF}}}$$

GASEOUS FUEL THAT IS NOT PUC NATURAL GAS SHALL NOT EXCEED A SULFUR CONTENT OF 50 GRAINS / 100 CF (788 ppmv) CALCULATED AS H<sub>2</sub>S.

USING SAME CALCULATION METHOD AS ABOVE ⇒

$$\boxed{134.5 \frac{\text{lb SO}_x}{\text{MMCF}}}$$

JH 12/2/97



SO<sub>x</sub> RULE COMPARISON FOR COMBUSTION OF LIQUID FUELSRULE 54.B.1SO<sub>x</sub> EXHAUST ≤ 300 ppm CALCULATED AT SO<sub>2</sub>DIESEL FUEL, 15% O<sub>2</sub>

$$\left(\frac{9220 \text{ DSCF}}{\text{MMBTU}}\right) \left(\frac{64 \text{ lb SO}_2}{\text{lb mole}}\right) \left(\frac{\text{lb mole}}{357 \text{ CF}}\right) \left(\frac{20.9}{20.9-15}\right) \left(\frac{300 \text{ ppm}}{10^6}\right) \left(\frac{141 \text{ MMBTU}}{\text{MGAL}}\right) = \boxed{228.5 \frac{\text{lb SO}_2}{\text{MGAL}}}$$

$$@ 39 \text{ O}_2 = \boxed{75.3 \frac{\text{lb SO}_2}{\text{MGAL}}}$$

RULE 64.B.2SOLID OR LIQUID FUEL SHALL NOT EXCEED  
A SULFUR CONTENT OF 0.5 PERCENT, BY WT.

FUEL OIL DENSITY ⇒ 7.2 lb/gal

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

JH 12/2/97

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:<br><br>Condition No. 57.1 | Description: Rule 57.1, Particulate Matter Emissions From Fuel Burning Equipment. |
|---|---|

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

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

Periodic monitoring is not necessary to certify compliance with Rule 57.1. To certify compliance, a reference to the Rule 57.B District analysis dated December 3, 1997 is sufficient.

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

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

Time Period Covered by Compliance Certification:

01/01/09 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:<br><br>Condition No. 64.B.1 | Description: Rule 64.B.1 |
|---|--------------------------|

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

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

Source Test monitoring – see attached last required source test of 11/16/06.

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if 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
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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.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09

5.0 SUMMARY OF RESULTS

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

| PARAMETER  | INLET   | EXHAUST | PERMIT LIMIT      |
|--|---------|---------|-------------------|
| O <sub>2</sub> , %   | 7.67    |         |                   |
| CO <sub>2</sub> , %  | 20.20   | 11.53   |                   |
| N <sub>2</sub> , %   | 43.35   | 7.99    |                   |
| H <sub>2</sub> O, %  | 6.47    | 80.47   |                   |
| Flow Rate, wscfm   | 1483.3  | 6.79    |                   |
| Flow Rate, dscfm   | 1387.4  | 9,849   |                   |
| Temperature, °F  | 125     | 9,112   | <1,500 Inlet      |
| Btu/scf  | 274.7   | 1,462.2 | 1400              |
| MM Btu/Hr  | 24.45   |         |                   |
| NO <sub>x</sub> :  |         |         |                   |
| ppm  |         |         |                   |
| ppm @ 3% O <sub>2</sub>  |         | 9.6     |                   |
| lb/hr (as NO <sub>2</sub> )  |         | 18.3    |                   |
| lb/day (as NO <sub>2</sub> )   |         | 0.62    | 2.43              |
| lb/MM Btu (as NO <sub>2</sub> )                                      |         | 15.0    |                   |
| lb/MM CF (as NO <sub>2</sub> )                                       |         | 0.026   | 0.06 Rule 74.17.1 |
|  |         | 7.49    |                   |
| CO: <sup>(1)</sup>   |         |         |                   |
| ppm  |         |         |                   |
| ppm @ 3% O <sub>2</sub>  |         | 20.0    |                   |
| lb/hr  |         | 38.2    |                   |
| lb/day   |         | 0.79    | 8.10              |
| lb/MM Btu  |         | 19.0    |                   |
| lb/MM CF   |         | 0.032   | 0.2 Rule 74.17.1  |
|  |         | 9.51    |                   |
| Hydrocarbons:  |         |         |                   |
| CH <sub>4</sub> , ppm  | 249,000 |         |                   |
| TGNMO, ppm (as CH <sub>4</sub> )                                     | 794     | < 1.00  |                   |
| TGNMO, lb/hr (as CH <sub>4</sub> )                                   | 2.7     | < 8.96  |                   |
| TGNMO, lb/MM Btu (as CH <sub>4</sub> )                               | -       | < 0.20  | 1.59              |
| TGNMO, lb/day (as CH <sub>4</sub> )                                  | 65.6    | < 0.008 |                   |
| TGNMO, ppm (as hexane)   |         | < 4.82  |                   |
| TGNMO, ppm @ 3% O <sub>2</sub> (as hexane)                           |         | < 1.49  |                   |
| TGNMO, lb/hr (as hexane)   |         | < 2.82  | 20                |
| Destruction Eff. %   |         | > 0.18  |                   |
| lb/MM CF   |         | > 91.87 |                   |
|  |         | < 2.16  |                   |
| Total Sulfur Compounds,  |         |         |                   |
| Total Reduced Sulfur Inlet, ppm                                      | 3.41    |         |                   |
| SO <sub>x</sub> Exhaust, lb/hr (as SO <sub>2</sub> ) <sup>(1)</sup>  |         | 0.03    | 0.41              |
| SO <sub>x</sub> Exhaust, lb/day (as SO <sub>2</sub> ) <sup>(1)</sup> |         | 1.13    |                   |
| lb/MM CF   |         | 0.56    |                   |

Notes:

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

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



5.0 SUMMARY OF RESULTS (Continued)

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

| Parameter  | INLET     |            |           |         | EXHAUST   |            |           |         |
|--|-----------|------------|-----------|---------|-----------|------------|-----------|---------|
|  | First Run | Second Run | Third Run | Average | First Run | Second Run | Third Run | Average |
| O <sub>2</sub> , %                                   | 7.63      | 7.57       | 7.78      | 7.67    | 11.31     | 11.48      | 11.81     | 11.53   |
| CO <sub>2</sub> , %                                  | 20.3      | 20.3       | 20.0      | 20.2    | 8.22      | 8.06       | 7.70      | 7.99    |
| N <sub>2</sub> , %                                   | 43.4      | 42.9       | 43.8      | 43.4    | 80.5      | 80.5       | 80.5      | 80.5    |
| H <sub>2</sub> O, %                                  | 5.9       | 7.8        | 5.7       | 6.47    | 8.00      | 4.73       | 7.63      | 6.79    |
| Flow Rate, wscfm                                     | 1,484.6   | 1,487.7    | 1,477.7   | 1,483.3 | 9,976     | 9,704      | 9,865     | 9,849   |
| Flow Rate, dscfm                                     | 1,397.0   | 1,371.7    | 1,393.5   | 1,387   | 8,911     | 9,178      | 9,246     | 9,112   |
| Temperature, °F                                      | 125.0     | 125.0      | 124.0     | 124.7   | 1,474     | 1,454      | 1,459     | 1,462   |
| Btu/scf  | 275       | 277        | 273       | 275     |           |            |           |         |
| MMBtu/Hr   | 24.50     | 24.73      | 24.12     | 24.45   |           |            |           |         |
| <b>NO<sub>x</sub>:</b>                               |           |            |           |         |           |            |           |         |
| ppm  |           |            |           |         |           |            |           |         |
| ppm @ 3% O <sub>2</sub>                              |           |            |           |         | 9.26      | 10.09      | 9.40      | 9.58    |
| lb/hr (as NO <sub>2</sub> )                          |           |            |           |         | 17.3      | 19.2       | 18.5      | 18.3    |
| lb/MM Btu (as NO <sub>2</sub> )                      |           |            |           |         | 0.39      | 0.66       | 0.62      | 0.62    |
|  |           |            |           |         | 0.024     | 0.027      | 0.026     | 0.026   |
| <b>CO: <sup>III</sup></b>                            |           |            |           |         |           |            |           |         |
| ppm  |           |            |           |         |           |            |           |         |
| ppm @ 3% O <sub>2</sub>                              |           |            |           |         | 20.0      | 20.0       | 20.0      | 20.0    |
| lb/hr  |           |            |           |         | 37.3      | 38.0       | 39.4      | 38.2    |
| lb/MM Btu  |           |            |           |         | 0.775     | 0.798      | 0.804     | 0.792   |
|  |           |            |           |         | 0.032     | 0.032      | 0.033     | 0.032   |
| <b>Hydrocarbons:</b>                                 |           |            |           |         |           |            |           |         |
| CH <sub>4</sub> , ppm                                | 210,000   | 269,000    | 268,000   | 249,000 | < 1       | < 1        | < 1       | < 1     |
| Ethane, ppm  | 7.59      | 5.92       | 7.19      | 6.90    | < 1       | < 1        | < 1       | < 1     |
| TGNM10, ppm (as CH <sub>4</sub> )                    | 660       | 849        | 873       | 794     | < 16.8    | < 5.86     | < 4.21    | < 8.96  |
| TGNM10, lb/hr (as CH <sub>4</sub> )                  | 3.29      | 2.89       | 3.02      | 2.73    | < 0.37    | < 0.13     | < 0.10    | < 0.20  |
| TGNM10, ppm (as hexane)                              | 110.0     | 141.5      | 145.5     | 132.3   | < 2.80    | < 0.98     | < 0.70    | < 1.49  |
| TGNM10, ppm @ 3% O <sub>2</sub> (as hexane)          | 148.6     | 190.0      | 198.5     | 179.0   | < 5.22    | < 1.86     | < 1.38    | < 2.82  |
| TGNM10, lb/hr (as hexane)                            | 2.05      | 2.59       | 2.71      | 2.45    | < 0.33    | < 0.12     | < 0.09    | < 0.18  |
| Destruction Eff. %                                   |           |            |           |         | > 83.76   | > 95.38    | > 96.46   | > 91.37 |
| <b>Sulfur Compounds:</b>                             |           |            |           |         |           |            |           |         |
| H <sub>2</sub> S, ppm                                | 4.00      | 3.18       | 3.04      | 3.41    |           |            |           |         |
| Carbonyl Sulfide, ppm                                | < 0.2     | < 0.2      | < 0.2     | < 0.2   |           |            |           |         |
| Methyl Mercaptan, ppm                                | < 0.2     | < 0.2      | < 0.2     | < 0.2   |           |            |           |         |
| Ethyl Mercaptan, ppm                                 | < 0.2     | < 0.2      | < 0.2     | < 0.2   |           |            |           |         |
| Dimethyl Sulfide, ppm                                | < 0.2     | < 0.2      | < 0.2     | < 0.2   |           |            |           |         |
| Carbon Disulfide, ppm                                | < 0.1     | < 0.1      | < 0.1     | < 0.1   |           |            |           |         |
| Isopropyl mercaptan, ppm                             | < 0.1     | < 0.1      | < 0.1     | < 0.1   |           |            |           |         |
| n-propyl mercaptan, ppm                              | < 0.1     | < 0.1      | < 0.1     | < 0.1   |           |            |           |         |
| Dimethyl Disulfide, ppm                              | < 0.1     | < 0.1      | < 0.1     | < 0.1   |           |            |           |         |
| Total Sulfur Compounds,                              |           |            |           |         |           |            |           |         |
| Total Reduced Sulfur Inlet, ppm                      | 4.00      | 3.18       | 3.04      | 3.41    |           |            |           |         |
| SO <sub>x</sub> Exhaust, lb/hr (as SO <sub>2</sub> ) |           |            |           |         | 0.056     | 0.043      | 0.042     | 0.047   |

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

<sup>III</sup> CO ppm values were set to 10% of the selected range (0-200 ppm).

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**Applicable Requirement or Part 70 Permit Condition**

|   |  |
|---|--|
| Citation, Including Attachment Number and/or Permit Condition Number:<br><br>Condition No. 64.B.2 | Description: Rule 64.B.2, Fuel Supplier's Certification. |
|---|--|

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

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

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

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

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

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09

From: GIL2 User To: LA - Montebello

Date: 2/8/2010 Time: 5:46:32 AM

Page 1 of 1

02/05/2010 17:46 FAX 1 310 615 3478 CHEVRON ES QCD LAB + CPL HOUSTON @ 001/001



**CHEVRON PRODUCTS COMPANY  
EL SEGUNDO**

**DFZUSNSUW-10  
Chevron Special ULSD2 (S10) (Winter)**

**Certificate of Analysis**

Sampled: 2/5/2010 07:00:00  
Batch Finished: 2/5/2010 17:36:30  
Report Generated: 2/5/2010 17:36:44

Predictive Model Number: N/A  
Batch No: DSLCAKE\_2010\_00797  
Vessel: TANK952  
Samples: 1076231

|       |         |                                |             |        |                            |
|-------|---------|--------------------------------|-------------|--------|----------------------------|
| D4052 | UPPER   | API                            | Degrees API | 35.9   | MIN 30.0                   |
| D4052 | LOWER   | API                            | Degrees API | 35.9   | MIN 30.0                   |
| D1500 | UPPER   | ASTM Color                     |             | <+0.5  | REPORT                     |
| D1500 | LOWER   | ASTM Color                     |             | <+0.5  | REPORT                     |
| D4176 | UPPER   | Appearance/Condition           |             | PASS   | PASS,B/C                   |
| D4176 | LOWER   | Appearance/Condition           |             | PASS   | PASS,B/C                   |
| D7039 | UPPER   | Sulfur by XOS                  | ppm         | 10     | MAX 10.0                   |
| D7039 | MIDDLE  | Sulfur by XOS                  | ppm         | 9      | MAX 10.0                   |
| D7039 | LOWER   | Sulfur by XOS                  | ppm         | 8      | MAX 10.0                   |
| D86   | AVERAGE | Initial Boiling Point          | °F          | 160    | REPORT                     |
| D86   | AVERAGE | 10%                            | °F          | 420    | REPORT                     |
| D86   | AVERAGE | 50%                            | °F          | 530    | REPORT                     |
| D86   | AVERAGE | 90%                            | °F          | 618    | 540 - 640                  |
| D86   | AVERAGE | Final Boiling Point            | °F          | 646    | REPORT                     |
| D86   | AVERAGE | Recovery                       | vol %       | 98.1   | REPORT                     |
| D86   | AVERAGE | Residue                        | vol %       | 1.4    | REPORT                     |
| D86   | AVERAGE | Loss                           | vol %       | 0.3    | REPORT                     |
| D93   | AVERAGE | Pensky-Martens Flash           | °F          | 160    | MIN 131                    |
| D130  | AVERAGE | Cu Strip Rating@122F@3hr       |             | 1B     | 1A,1B,2A,2B,2C,2D,2E,3A,3B |
| D445  | AVERAGE | Kinematic Viscosity @40C(Auto) | cSt         | 3.095  | 1.90 - 4.10                |
| D5949 | AVERAGE | Pour Point                     | °F          | +0     | MAX +20                    |
| D5773 | AVERAGE | Cloud Point, Automatic         | °F          | +3     | MAX +24                    |
| D6890 | AVERAGE | Derived Cetane Number          |             | 50.10  | MIN 49.6                   |
| D5186 | AVERAGE | Total Aromatics                | weight %    | 22.6   | MAX 23.6                   |
| D6186 | AVERAGE | Polynuclear Aromatics          | weight %    | 2.8    | MAX 4.7                    |
| D4629 | AVERAGE | Nitrogen                       | weight %    | 0.0008 | MAX 0.0715                 |

I certify that above material meets prescribed requirements.

Anthony Sopys 2/8/2010 17:36:59  
Company Representative Date/Time

Comments:

JMJ 2/6/2010 80-975 3-8", 80-161 21-8"  
DAV 2/6 80-162 21-8", 84-162 8NSF

ATTENTION Jason S.

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:<br><br>Condition No. 74.6 | Description: Rule 74.6 - Surface cleaning and Degreasing. |
|---|---|

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

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

Only minor maintenance cleaning activities using solvents, which are purchased in and applied from manufacture – distributor labeled containers, of one liter or less in volume are used. Less than 5 pounds of solvent was used in 2009.

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.
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:

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**Applicable Requirement or Part 70 Permit Condition**

|  |   |
|--|---|
| Citation, Including Attachment Number and/or Permit Condition Number:<br><br>Condition No. 74.11.1 | Description: Rule 74.11.1, Large Water Heaters and Small Boilers. |
|--|---|

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

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

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

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if 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.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

Time Period Covered by Compliance Certification:

01/01/09 to 12/31/09



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**Applicable Requirement or Part 70 Permit Condition**

|  |  |
|--|--|
| Citation, Including Attachment Number and/or Permit Condition Number:<br><br>Condition No. 74.22 | Description: Rule 74.22, Natural Gas-Fired Fan -Type Furnaces. |
|--|--|

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

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

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

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

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

Time Period Covered by Compliance Certification:

- 01/01/09 to 12/31/09

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**Applicable Requirement or Part 70 Permit Condition**

|   |   |
|---|---|
| Citation, Including Attachment Number and/or Permit Condition Number:<br><br>Condition No. 74.1 | Description: Rule 74.1 – Abrasive Blasting. |
|---|---|

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

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

No abrasive blasting was conducted in 2009.

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

Time Period Covered by Compliance Certification:

01/01/09 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:<br><br>Condition No. 74.2 | Description: Rule 74.2 – Architectural Coatings. |
|---|--|

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

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

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

2.  Yes  No Are you currently in compliance as indicated by the most recent monitoring measurement or observation as described above?
3. Please indicate if 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.
8. If this applicable requirement or Part 70 permit condition requires a source test to demonstrate compliance with a quantifiable emission rate, attach a summary of the most recent source test to this form; or complete and attach Form TVPF47, the quantifiable applicable requirement or Part 70 permit condition attachment.

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**Applicable Requirement or Part 70 Permit Condition**

|   |  |
|---|--|
| Citation, Including Attachment Number and/or Permit Condition Number:<br><br>Condition No. 74.4.D | Description: Rule 74.4.D – Cut Back Asphalt. |
|---|--|

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

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

No road oils were applied in 2009.

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

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**Applicable Requirement or Part 70 Permit Condition**

|  |   |
|--|---|
| Citation, Including Attachment Number and/or Permit Condition Number:<br><br>Condition No. 74.28 | Description: Rule 74.28 – Asphalt Roofing Operations. |
|--|---|

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

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

Asphalt roofing operations were not conducted during 2009.

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

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**Applicable Requirement or Part 70 Permit Condition**

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|--|--|
| Citation, Including Attachment Number and/or Permit Condition Number:<br><br>Condition No. 74.29 | Description: Rule 74.29 – Soil Decontamination Operations. |
|--|--|

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

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

Soil decontamination operations were not conducted during 2009.

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

|   |   |
|---|---|
| Citation, Including Attachment Number and/or Permit Condition Number:<br><br>40CFR Part 61, Subpart M | Description: 40CFR.61.M - Part 61.145 National Emission Standard for Asbestos |
|---|---|

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

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

Renovation or demolition of asbestos containing materials was not conducted during 2009.

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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01 / 01 / 09 to 12 / 31 / 09