

5936 PERKINS ROAD
OXNARD, CA 93033

T (805) 988-3881
F (805) 488-5186

May 13, 2010

Mr. Keith Duval
Supervisor, Enforcement
Ventura County APCD
669 County Square Drive
Ventura, CA 93003

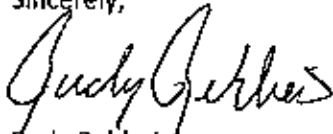
Re: International Paper – Hueneme Mill
2009-2010 Annual Title V Certification Package (PTO 0157)

Dear Mr. Duval:

Enclosed, please find a binder containing the 2009-2010 Title V Certification Forms and related documentation for the International Paper – Hueneme Mill. Supporting documentation is filed directly following the TVAF46 form for the applicable requirement.

If you have any questions, please feel free to contact Robyn Lebrilla at 805.271.7284.

Sincerely,



Kudy Rehbein
International Paper, Hueneme Mill

enc: 2009-2010 Annual Title V Compliance Certification Binder

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VENTURA COUNTY
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Annual Title V Compliance Certification
International Paper – Hueneme Mill
May 15, 2010

Section 1 TVPF45 – Cover Sheet

Section 2 TVPF46 – Applicable Requirement or Part 70 Permit Attachments

| Requirement ID | Description |
|------------------------------|--|
| 6.a. 74.15N3-0157 | Boilers, Steam Generators, and Process Heaters – Exemption for Emergency Standby Units. |
| 6.b. 103N4-0157 | Stack Monitoring |
| 6.c. STRMLN157- NOx, CO, NH3 | Gas Turbine Based Cogeneration Unit; NOx, CO, and NH3 Applicable Requirements – NOx Streamlined. |
| 6.d. STRMLN157-SOx | Gas Turbine Based Cogeneration Unit; SOx Applicable Requirements – Streamlined. |
| 7.a. PO0157PC1 | General Recordkeeping Requirements. |
| 7.b. PO0157PC1 | Solvent Cleaning Additional Requirements. |
| 7.c. PO0157PC2 | Turbine NOx and CO Emissions Limits. |
| 7.d. PO0157PC2 | Turbine and Duct Burner Natural Gas Only Requirement. |
| 7.e. PO0157PC2 | Nebraska Boiler and Turbine Simultaneous Operation Limits. |
| 7.f. PO0157PC2 | Nebraska Boiler NOx Emissions Limits. |
| 7.g. PO0157PC2 | Nebraska Boiler NOx and Oxygen Continuous Monitoring Requirements. |
| 7.h. PO0157PC2 | Nebraska Boiler Fuel Oil Limitations. |
| 7.i. PO0157PC2 | Recordkeeping Requirements for the Nebraska Boiler Fuel Oil Limitations. |
| 7.j. PO0157PC2 | Recordkeeping Requirements for the Maxon Duct Burner. |
| 8.a. Rule 50 | Opacity. |
| 8.b. Rule 54.B.1 | Sulfur Compounds – SOx at Point of Discharge. |
| 8.c. Rule 54.B.2 | Sulfur Compounds – SOx at or Beyond Property Line. |
| 8.d. Rule 57.1 | Particulate Matter Emissions From Fuel Burning Equipment. |
| 8.e. Rule 64.B.1 | Sulfur Content of Fuels – Gaseous Fuel Requirements. |
| 8.f. Rule 64.B.2 | Sulfur Content of Fuels – Liquid Fuel Requirements. |

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| Requirement ID | Description |
|-------------------------------|---|
| 8.g. Rule 74.6 | Surface Cleaning and Degreasing, 11/11/03 revision. |
| 8.h. Rule 74.11.1 | Large Water Heaters and Small Boilers. |
| 8.i. Rule 74.22 | Natural Gas-Fired, Fan Type Central Furnaces. |
| 8.x. Rule 52 | Particulate Matter Concentration (Grain Loading) |
| 8.x. Rule 68 | Carbon Monoxide |
| 9.a. Rule 74.1 | Abrasive Blasting. |
| 9.b. Rule 74.2 | Architectural Coatings. |
| 9.c. 40CFR61.M | 40 CFR 61 Subpart M – Asbestos NESHAPS. |
| 10.a. Part 70 General | Part 70 Permit General Conditions. |
| 10.b. PO General | Permit to Operate General Conditions. |
| 10.c.1. SHIELD-D, Da, Db, Dc) | Part 70 Permit Shield – 40 CFR Part 60, Subparts D, Da, Db, and Dc. |
| 10.c.2. SHIELD-40CFR72-78 | Part 70 Permit Shield – 40 CFR Parts 72 – 78. |
| 11.a. 40CFR68RMP-157 | Accidental Release Prevention and Risk Management Plans. |
| 11.b. 40CFR82 | 40 CFR 82 – Protection of Stratospheric Ozone |

Section 3 TVPF47 – Quantifiable Applicable Requirement or Part 70 Permit Condition Attachment



Ventura County
Air Pollution
Control District

**ANNUAL COMPLIANCE CERTIFICATION
SIGNATURE COVER FORM**

A copy of each Annual Compliance Certification shall be submitted to EPA, Region 9, at the following address:

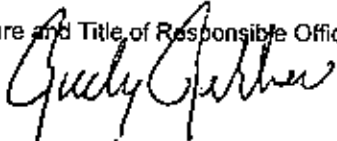
Mr. Gerardo Rios, Chief
Permits Office (AIR-3)
Office of Air Division
EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105

Confidentiality

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

Certification by Responsible Official

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

| | |
|---|--------------------|
| Signature and Title of Responsible Official:  Title: Mill Manager | Date: 5/13/2010 |
|---|--------------------|

| |
|---|
| Time Period Covered by Compliance Certification <u>04</u> / <u>01</u> / <u>2009</u> (MM/DD/YY) to <u>03</u> / <u>31</u> / <u>2010</u> (MM/DD/YY) |
|---|

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: 6.a. 74.15N3-0157 | Description: Rule 74.15.C.3. Boilers, Steam Generators, and Process Heaters -Exemption for Emergency Standby Units |
|--|---|

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.

Unit operated zero hours which is less than 10 days (240 hr).
Therefore, no tune-up was performed.

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:

04 / 01 / 2009 (MM/DD/YY) to 03 / 31 / 2010 (MM/DD/YY)

Attachment to 6.a. 74.15N3-0157

| Condition No. | Response |
|---------------|--|
| 1 | Pursuant to Rule 74.15.C.3, Rule 74.15.B.1 requirement do not apply because the unit only operated during breakdowns which were reported under Rule 32. |
| 2 | When combined with emissions from the Cogen units(s), emissions do not exceed 50 tons of NOx per year and 97.66 tons of CO per year (see table below). |
| 3 | Tuning requirements do not apply because the unit operated less than ten (10) days per calendar year. |
| 4 | Tuning requirements do not apply because the unit operated less than ten (10) days per calendar year. |
| 5 | Records of hours of operation and resulting emissions are presented in the table below. No boiler tune-up reports are available for the compliance year. |

| Month-Year | Monthly | | Rolling 12-Months | | Emissions | | | | | | | | |
|--------------|-------------------|----------------|-------------------|----------------|---------------------|------------------------------|-----------|----------------------------|-----------|----------------------------|-----------|------------------------------|-----------|
| | Natural Gas (scf) | Uptime (hours) | Natural Gas (scf) | Uptime (hours) | Capacity Factor (%) | Nebaska Emissions NOx (tons) | CO (tons) | Cogen Emissions NOx (tons) | CO (tons) | Total Emissions NOx (tons) | CO (tons) | Rolling 12 Months NOx (tons) | CO (tons) |
| April-08 | 21,455 | 2.8 | 21,455 | 2.80 | 0.002% | 0.0134 | 0.00168 | 3.83 | 4.01 | 3.84 | 4.01 | 3.84 | 4.01 |
| May-08 | 76,373 | 2.58 | 97,828 | 5.38 | 0.011% | 0.0124 | 0.00155 | 3.89 | 3.94 | 3.90 | 3.94 | 7.75 | 7.95 |
| June-08 | 0 | 0 | 97,828 | 5.38 | 0.011% | 0 | 0 | 3.82 | 3.61 | 3.82 | 3.61 | 11.57 | 11.66 |
| July-08 | 0 | 0 | 97,828 | 5.38 | 0.011% | 0 | 0 | 3.89 | 3.43 | 3.89 | 3.43 | 15.46 | 14.99 |
| August-08 | 0 | 0 | 97,828 | 5.38 | 0.011% | 0 | 0 | 4.03 | 3.21 | 4.03 | 3.21 | 19.49 | 18.20 |
| September-08 | 0 | 0 | 97,828 | 5.38 | 0.011% | 0 | 0 | 3.80 | 3.00 | 3.80 | 3.00 | 23.29 | 21.20 |
| October-08 | 0 | 0 | 97,828 | 5.38 | 0.011% | 0 | 0 | 3.66 | 3.65 | 3.66 | 3.65 | 26.66 | 24.95 |
| November-08 | 0 | 0 | 97,828 | 5.38 | 0.011% | 0 | 0 | 2.21 | 2.20 | 2.21 | 2.20 | 29.16 | 27.05 |
| December-08 | 0 | 0 | 97,828 | 5.38 | 0.011% | 0 | 0 | 0.82 | 0.97 | 0.82 | 0.97 | 28.98 | 28.92 |
| January-09 | 0 | 0 | 97,828 | 5.38 | 0.011% | 0 | 0 | 2.49 | 2.63 | 2.49 | 2.63 | 32.47 | 30.65 |
| February-09 | 0 | 0 | 97,828 | 5.38 | 0.011% | 0 | 0 | 2.34 | 2.38 | 2.34 | 2.38 | 34.81 | 33.03 |
| March-09 | 0 | 0 | 97,828 | 5.38 | 0.011% | 0 | 0 | 2.28 | 2.77 | 2.26 | 2.77 | 37.07 | 35.80 |
| April-09 | 0 | 0 | 76,373 | 2.58 | 0.009% | 0 | 0 | 2.65 | 2.73 | 2.65 | 2.73 | 35.87 | 34.52 |
| May-09 | 0 | 0 | 0 | 0 | 0% | 0 | 0 | 2.94 | 2.95 | 2.94 | 2.95 | 34.91 | 33.53 |
| June-09 | 0 | 0 | 0 | 0 | 0% | 0 | 0 | 2.87 | 2.62 | 2.87 | 2.62 | 33.96 | 32.54 |
| July-09 | 0 | 0 | 0 | 0 | 0% | 0 | 0 | 2.90 | 2.50 | 2.90 | 2.50 | 32.97 | 31.61 |
| August-09 | 0 | 0 | 0 | 0 | 0% | 0 | 0 | 2.85 | 2.56 | 2.85 | 2.56 | 31.59 | 30.96 |
| September-09 | 0 | 0 | 0 | 0 | 0% | 0 | 0 | 2.89 | 2.34 | 2.89 | 2.34 | 30.48 | 30.30 |
| October-09 | 0 | 0 | 0 | 0 | 0% | 0 | 0 | 2.75 | 2.23 | 2.75 | 2.23 | 29.57 | 28.88 |
| November-09 | 0 | 0 | 0 | 0 | 0% | 0 | 0 | 2.79 | 2.76 | 2.79 | 2.76 | 30.15 | 29.44 |
| December-09 | 0 | 0 | 0 | 0 | 0% | 0 | 0 | 3.42 | 3.35 | 3.42 | 3.35 | 32.75 | 31.82 |
| January-10 | 0 | 0 | 0 | 0 | 0% | 0 | 0 | 3.92 | 4.11 | 3.92 | 4.11 | 34.18 | 33.30 |
| February-10 | 0 | 0 | 0 | 0 | 0% | 0 | 0 | 3.45 | 4.53 | 3.45 | 4.53 | 35.29 | 35.45 |
| March-10 | 0 | 0 | 0 | 0 | 0% | 0 | 0 | 3.57 | 5.08 | 3.57 | 5.08 | 36.50 | 37.76 |
| Maximums: | 0 | 0.00 | 76,373 | 2.58 | 0.009% | 0 | 0 | 3.92 | 5.08 | 3.92 | 5.08 | 36.50 | 37.76 |

Sample Calculation:

$$\text{Capacity Factor} = \frac{\text{Annual Fuel Usage} \cdot \text{HHV natural gas} / (\text{Equipment rating} \cdot \text{Hours/year})}{\text{Capacity Factor} = (10 \text{ MMcf/yr}) \cdot (1,030 \text{ BTU/scf}) / ((108 \text{ MMBtu/hr}) \cdot (8,760 \text{ hr/yr}))}$$

$$\text{Capacity Factor} = \frac{1.09\%}{1.09\%}$$

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Applicable Requirement or Part 70 Permit Condition

| | |
|--|--|
| Citation, including Attachment Number and/or Permit Condition Number: 6.b. 103NS-0157 | Description: Rule 103. Stack Monitoring - Nebraska Boiler |
|--|--|

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.

Maximum rolling 12-month capacity factor is 0.0%. Thus, the unit remains exempt from Rule 103.A.2. Monthly fuel consumption and capacity factor calculations are attached to the TVPF46 form for requirement 6.a. 74.15N3-0157.

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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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: | Description: |
|---|--|
| 6.c. STRMLN157-NOx, CO, NH3 | Gas Turbine Based Cogeneration Unit; NOx, CO, and NH3 Applicable Requirements - NOx Streamlined |

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 re-scheduled to later date with APCD approval (see attached letter).
CEM data for other operating parameters is maintained on-site.
Sampling for NOx, CO & O2 - EPA Method 20 and CARB Method 100, NH3 - BAAQMD Method ST-1B,
HHV of gaseous fuel - ASTM Method D1826-88, HHV of fuel oil - ASTM Method 240-87.

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
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Ventura County
Air Pollution
Control District

669 County Square Drive
Ventura, California 93003

tel 805/645-1400
fax 805/645-1444
www.vcapcd.org

Michael Villegas
Air Pollution Control Officer

December 2, 2009

Rudy Rehbein, Plant Manager
International Paper, Hueneme Mill
P. O. Box 519
Port Hueneme, CA 93044

Subject: Scheduling of Turbine Annual Source Test

Dear Mr. Rehbein:

The Ventura County APCD has reviewed your request to return the schedule of the annual source test on the turbine back to its original source test month. We found that International Paper's source test was conducted in May starting in 1999, and has moved forward a month periodically since that time. Therefore, we will agree to allow International Paper to schedule its annual source test in April of each year.

Thank you for your cooperation in this matter. If you have any questions, please contact air quality engineer Lyle Olson at 805/645-1413.

Sincerely,

A handwritten signature in black ink, appearing to read "Keith Duval".

Keith Duval
Deputy Air Pollution Control Officer

✓ c. Victor Kumpera, Technical Department Superintendent, International Paper, Hueneme Mill

IPSTDELAY

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: 6.d. STRMLN157-SOx | Description: Gas Turbine Based Cogeneration Unit, SOx Applicable Requirements -Streamlined |
|---|--|

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.

Facility burns PUC quality gas only. Annual source test for non-PUC quality gas, none for PUC quality gas. Gaseous Fuel: SCAQMD Method 307-94; Exhaust Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD Method 307-94, as appropriate.

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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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: | Description: |
|---|------------------------------------|
| 7.a. P00157PC1 | General Recordkeeping Requirements |

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

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

Monthly records of throughput and consumption are attached to the TVPF 46 forms for requirements 7.b. P00157PC1 (solvents) and 7.c. P00157PC2 (fuels).

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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Applicable Requirement or Part 70 Permit Condition

| | |
|--|--|
| Citation, Including Attachment Number and/or Permit Condition Number: 7.5. 2000157PC1 | Description: Solvent Cleaning Additional Requirements |
|--|--|

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

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

Monthly records of solvent purchase and usage are 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.”

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

Form TVPF46/07-21-03 Page 2 of 2

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

04 / 01 / 2009 (MM/DD/YY) to 03 / 31 / 2010 (MM/DD/YY)

Attachment to 7.b. P00157PC1

| Material Name: Container size (gal): VOC content (lb/gal): HHC content (lb/gal): | CRC14005-Natural Degreaser | | Power Back | | Amax Solvent Degreaser (378 GE) | | Electron LVC Aerosol (replaces Amax 378E) | | Mobil Grease XTG | | Mobilgrease XHP 222 | |
|---|----------------------------|----------|------------------|----------|---------------------------------|----------|---|----------|------------------|----------|---------------------|----------|
| | (containers /mo) | (gal/yr) | (containers /mo) | (gal/yr) | (containers /mo) | (gal/yr) | (containers /mo) | (gal/yr) | (containers /mo) | (gal/yr) | (containers /mo) | (gal/yr) |
| May-08 | 0 | - | 2.5 | - | 0 | - | - | - | 0 | - | 0 | - |
| Jun-08 | 0 | - | 6 | - | 6 | - | - | - | 0 | - | 0 | - |
| Jul-08 | 0 | - | 9 | - | 6 | - | - | - | 0 | - | 0 | - |
| Aug-08 | 0 | - | 0 | - | 0 | - | - | - | 0 | - | 0 | - |
| Sep-08 | 0 | - | 7.5 | - | 5 | - | - | - | 0 | - | 0 | - |
| Oct-08 | 0 | - | 7 | - | 3 | - | - | - | 0 | - | 0 | - |
| Nov-08 | 24 | - | 15 | - | 1 | - | - | - | 2 | - | 0 | - |
| Dec-08 | 0 | - | 15 | - | 1 | - | - | - | 0 | - | 0 | - |
| Jan-09 | 0 | - | 5 | - | 2 | - | - | - | 0 | - | 0 | - |
| Feb-09 | 0 | - | 5 | - | 3 | - | - | - | 0 | - | 0 | - |
| Mar-09 | 0 | - | 5 | - | 7 | - | - | - | 0 | - | 0 | - |
| Apr-09 | 0 | 3 | 85 | 3.2 | 0 | 3.2 | 0 | 0 | 0 | 0.34 | 0 | 0 |
| May-09 | 0 | 3 | 88 | 3.2 | 0 | 3.2 | 0 | 0 | 1 | 0.43 | 1 | 0.086 |
| Jun-09 | 0 | 3 | 100 | 2.8 | 2 | 2.8 | 0 | 0 | 0 | 0.43 | 0 | 0.086 |
| Jul-09 | 0 | 3 | 91 | 2.3 | 0 | 2.3 | 0 | 0 | 0 | 0.43 | 0 | 0.086 |
| Aug-09 | 0 | 3 | 103 | 1.8 | 0 | 1.8 | 0 | 0 | 0 | 0.43 | 0 | 0.086 |
| Sep-09 | 0 | 3 | 9 | 1.5 | 0 | 1.5 | 0 | 0 | 0 | 0.43 | 0 | 0.086 |
| Oct-09 | 0 | 3 | 96 | 1.4 | - | 1.4 | 0 | 0.42 | 0 | 0.43 | 0 | 0.086 |
| Nov-09 | 24 | 3 | 89 | 1.3 | - | 1.3 | 0 | 0.42 | 0 | 0.26 | 0 | 0.086 |
| Dec-09 | 0 | 3 | 79 | 1.1 | - | 1.1 | 0 | 0.42 | 0 | 0.26 | 0 | 0.086 |
| Jan-10 | 0 | 3 | 74 | 0.8 | - | 0.8 | 0 | 1.13 | 0 | 0.26 | 0 | 0.086 |
| Feb-10 | 0 | 3 | 69 | 0.2 | - | 0.2 | 5 | 1.69 | 1 | 0.17 | 0 | 0.086 |
| Mar-10 | 0 | 3 | 64 | 0.2 | - | 0.2 | 4 | 1.69 | 0 | 0.17 | 0 | 0.086 |
| Rolling 12-Month Maximums | 24 | 3 | 18 | 3.2 | 2 | 3.2 | 5 | 1.69 | 1 | 0.43 | 1 | 0.086 |
| ROG Emissions (tons/yr): | 0.010 | | 0.007 | | 0.010 | | 0.001 | | 0 | | 0 | |
| HHC Emissions (tons/yr): | 0 | | 0 | | 0 | | 0 | | 0 | | 0 | |

* lb/gal VOC and HHC contents are calculated on a less water and exempt compounds basis.

Material Safety Data Sheet

ELECTRON LVC Aerosol Low VOC Degreasing Solvent

Rev. 05/01/2008

2177-A Flintstone Drive
Tucker, GA 30084
www.ecolink.com
email: info@ecolink.com
800/886-8240 or
770/621-8240 (9-5 EST)

EMERGENCY NUMBERS
Call Infotrac
800/535-5053 (24 HOURS)

Section I: Product Identification

Product name: ELECTRON LVC Aerosol
Synonym: Proprietary Blend
Molecular Formula: Proprietary Blend

The "Plain English" Section

Material Safety Data Sheets can be confusing. Federal law requires us to print a great deal of technical information, which probably won't help the non-scientist. ECOLINK includes this "PLAIN ENGLISH" section, written to address the questions and concerns of the average person. If you have additional health, safety or product questions, don't hesitate to call us at 800/886-8240.

Health Hazards: ELECTRON LVC is an industrial chemical. We call it "environmentally preferred" because it is intended to replace products that are more hazardous, (HCFC-141b, trichloroethylene, MEK, etc.). This does not mean that ELECTRON LVC is completely harmless. It is strong enough to remove tough industrial soils, so it can irritate your skin. We suggest you wear gloves, and avoid extended exposure to unprotected skin. Do not get it in your eyes, or breath large amounts of the vapor, (it will dry out your nasal passages). Used on a rag or from a spray bottle, the product will not produce fumes in any great quantity, (do not spray ELECTRON LVC under high pressure without adequate ventilation). For more exposure and first aid information, refer to MSDS Sections II, VI.

Flashpoint: ELECTRON LVC's flashpoint is 109° F. This represents the temperature that the liquid must be before it emits fumes that may ignite. If ELECTRON LVC is used on rags, the rags can ignite if exposed to an open flame because the solvent is "wicked" onto the cloth. Be sure to dispose of rags in an airtight container specifically designed to prevent spontaneous combustion. Don't use ELECTRON LVC or any other combustible solvent around welding or any other hot work area.

Disposal: Because ELECTRON LVC's flashpoint is below 140°F, it is considered a hazardous waste product, (ignitable). If you spill ELECTRON LVC, notify the proper environmental people at your company ASAP. Once ELECTRON LVC is contaminated with whatever you are cleaning, the resulting mixture may fall under an additional hazardous classification, depending on whether or not the material you are cleaning is hazardous. If you are not sure how to dispose of the used ELECTRON LVC give us a call and we will help you make the right decision.

Section II: Hazardous Components

| | |
|----------------|---|
| Chemical Name | Parachlorobenzotrifluoride |
| CAS No. | 98-56-6 |
| Approx. wt. % | 85-95% |
| Exposure Limit | ACGIH TLV: Not Established OSHA PEL: Not Established 25 ppm TWA: Supplier |

| | |
|----------------|-----------------|
| Chemical Name | d-Limonene |
| CAS No. | 5989-27-5 |
| Approx. wt. % | 5-10% |
| Exposure Limit | Not Established |

| | |
|---------------|---|
| Chemical Name | Carbon Dioxide |
| CAS No. | 124-38-9 |
| Approx. wt. % | <5% |
| Exposure | ACGIH-TLV – 5000 ppm OSHA-PEL – 5000 ppm |

RCRA REGULATED: Yes (Refer to Sec. VIII)

CERCLA (superfund): N/A

ALL MATERIALS IN PRODUCT ARE TSCA LISTED.

| | |
|--------------------|------------|
| DOT Regulated: | No |
| DOT Haz. Class: | N/A |
| DOT Shipping Name: | N/A |
| DOT Number: | Not Listed |

Section III: Physical Data

| | |
|-----------------------------|---|
| Appearance & Odor: | Clear, colorless liquid with sweet naphthalenic odor. |
| Boiling Range: | 280-320°F |
| Evaporation Rate (nBuAc=1): | Approx. 0.8 |
| Solubility In Water: | Nil |
| Specific Gravity: | 1.258 |
| VOC Content: | 98 gmv/l |
| Vapor Density (AIR=1): | >5.0 |
| Vapor Pressure (mm Hg.): | 5.1 @ 20°C (liquid) |

Section IV: Fire and Explosion Hazard Data

Flash Point (Method):

Bulk Liquid (TCC) 109°F

Flammable Limits:

LEL Approx. 1
UEL Approx 10

Autoignition temperature Unknown

Extinguishing Media:

Regular foam, water fog, carbon dioxide, dry chemical, class B.

Special Fire Fighting Procedures:

Keep fire exposed containers cool with water. Fire fighters should wear self-contained breathing apparatus with a full facepiece operated in the positive pressure demand mode with appropriate gear and chemical resistant personal protective equipment.

Unusual Fire & Explosion Hazards:

Vapors are heavier than air and may travel along the ground or be moved by ventilation and ignited by heat, pilot lights, other flames and ignition sources at locations distant from material handling point. Contents under pressure. Do not store at temperatures exceeding 120 F or in direct sunlight.

Section V: Reactivity Data

Stability: Stable

Conditions to Avoid:

Sources of ignition such as sparks, hot spots, welding, flames and cigarettes. Ignition/flash may result if concentration of product is in the flammable range (See Section IV for LEL and UEL values).

Incompatibility (materials to avoid):

If mixed with strong oxidizers and or acids there is the possibility of a dangerous chemical reaction.

Hazardous Decomposition:

May form carbon dioxide and carbon monoxide.

Hazardous Polymerization:

Will Not Occur.

Section VI: Health Hazard Data

Primary routes of exposure:

Oral, Inhalation, and Skin

Ingestion:

Swallowing large amounts may be harmful by causing gastrointestinal irritation.

Inhalation:

Breathing large amounts may be harmful, by causing nose, throat, and respiratory tract irritation.

Eyes:

Irritant. Liquid contact will irritate eyes and may cause stinging, tearing, and redness.

Skin or Contact:

May cause mild irritation or redness and burning, skin defatting.

First Aid:

Ingestion:

Do not induce vomiting. If conscious, give 1 or 2 glasses of water. Seek medical attention immediately. Caution: aspiration into lungs can cause chemical pneumonia which may be fatal.

Inhalation:

Remove to fresh air; if breathing is difficult give oxygen. Keep person warm and quiet. Seek medical attention.

Eyes:

Irrigate immediately with water for at least 15 minutes. Get medical attention if irritation persists.

Skin:

Wash with soap and water. Thoroughly clean contaminated clothes and shoes before re-use. If symptoms persist, seek medical attention.

Carcinogen:

NTP – Not Listed
IARC Monographs – None
OSHA REGS – Not Regulated

Section VII: Precautions for Safe Handling

HMIS Information:

Health – 2 / Reactivity – 0
Flammability – 2 Personal Protection – C

HMIS Definition:

0 – Minimal 1 – Slight 2 – Moderate 3 – Serious 4 – Extreme
"7" in the Health Category denotes material does not target any major organs.

Eye Protection:

Safety glasses and splash protection required.

Protective Gloves:

Chemical resistant such as Butyl, Nitrile, Teflon

Respiratory Protection:

If exposure limits are exceeded, respiratory protection such as NIOSH certified organic vapor mask.

Ventilation: Good general ventilation (typically 10 air changes per hour) should be used. If applicable use process enclosures, local exhaust, or other engineering controls to maintain levels below exposure limits.

Other Protective Clothing: Not required under normal use.

Work Practices: Wash hands before eating, drinking, or smoking.

Section VIII: Control Measures

Absorb liquid on vermiculite, floor absorbent, or other absorbent material and transfer to hood. Eliminate all ignition sources, (flares, flames including pilot lights, electrical sparks). Prevent from entering drains, sewers, streams, etc. If runoff occurs, notify authorities as required. Pump or vacuum transfer spilled product to clean containers for recovery. Transfer contaminated absorbent, soil and other materials to containers for disposal.

Waste Disposal Method: ELECTRON LVC liquid is to be disposed of according to local, state, and federal

regulations. Please call us if you need additional disposal information.

Under RCRA the liquid concentrate is considered a hazardous waste due to the flash point. The EPA hazardous waste number is D001.

Precautions To Be Taken In Handling & Storing: Since empty containers retain product residues, all hazard precautions given in the data sheet must be observed. All metal pails or drums should be grounded and/or bonded when material is transferred. Any use of this product in elevated temperature processes should be thoroughly evaluated to establish and maintain safe operating conditions. Sudden release of hot organic chemical vapors or mists from process equipment operating at elevated temperature may result in ignition.

Other Precautions: Keep this and all chemicals out of the reach of children.

Section IX: Part Number and Packaging

| <u>Product Name</u> | <u>Part No.</u> | <u>Packaging</u> |
|---------------------|-----------------|---------------------|
| ELECTRON LVC | 1181-18 | 12 x 18 oz aerosols |

DISCLAIMER: Ecolink, Inc. believes the information contained herein is accurate. However, Ecolink makes no warranty, expressed or implied, regarding the accuracy of this data or the results to be obtained by the use thereof. Ecolink, Inc. assumes no responsibility for injury from the use of the product described herein.

END OF MSDS

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: 7.c. PQ00157PC2 | Description: Turbine NOx and CO Emissions 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.

Monthly calculations based upon NOx and CO hourly emissions from Cogen unit are attached. Hourly records are maintained on-site. Emissions exceedances were reported to APCD in letters dated August 28 and October 2 which are also 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.”

Ventura County Air Pollution Control District
COMPLIANCE CERTIFICATION PERMIT FORM
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:

04 / 01 / 2009 (MM/DD/YY) to 03 / 31 / 2010 (MM/DD/YY)

Attachment to T.C. P000157P-CZ

GAS USE AND EMISSIONS BY MONTH

| DATE | GAS TURBINE | | | COEN DUCT BURNER | | | MAXON BURNER | | | CEMS | | | | | |
|---|------------------|-----|--------------------------|------------------|------------------|--------------------------|---------------|------------------|--------------------------|-----------|----------------------------|--------------------|------------------------------|--------------------|------------------------------|
| | Monthly (therms) | HHV | Rolling 12-month (MMBtu) | Monthly (scf) | Monthly (therms) | Rolling 12-month (MMBtu) | Monthly (scf) | Monthly (therms) | Rolling 12-month (MMBtu) | NOx (lbs) | Rolling 12-month NOx (lbs) | Monthly NOx (tons) | Rolling 12-Months NOx (tons) | Monthly NOx (tons) | Rolling 12-Months NOx (tons) |
| Apr-08 | 1,950,809 | - | 31,332 | 3,035,020 | 3 | 4,008 | 387,472 | 0.4 | 0.018 | 0.03 | 3.83 | 4.0 | 3.8 | 4.0 | 3.8 |
| May-08 | 2,016,704 | - | 368 | 2,105,476 | 5 | 1,103 | 1,069,131 | 1.5 | 0.050 | 0.07 | 3.94 | 8.0 | 3.9 | 8.0 | 3.9 |
| Jun-08 | 1,997,284 | - | 368 | 1,681,772 | 7 | 3,421 | 3,305,231 | 4.8 | 0.154 | 0.22 | 3.61 | 11.8 | 3.6 | 11.8 | 3.6 |
| Jul-08 | 2,029,837 | - | 777 | 1,805,389 | 8 | 4,474 | 4,275,757 | 6.2 | 0.097 | 0.24 | 3.43 | 15.0 | 3.4 | 15.0 | 3.4 |
| Aug-08 | 2,113,324 | - | 982 | 1,931,515 | 9 | 5,934 | 5,478,114 | 5.8 | 0.077 | 0.27 | 3.21 | 18.2 | 3.2 | 18.2 | 3.2 |
| Sep-08 | 1,996,249 | - | 1,176 | 1,909,880 | 9 | 12,164 | 11,783,302 | 6.9 | 0.056 | 0.32 | 3.00 | 21.2 | 3.0 | 21.2 | 3.0 |
| Oct-08 | 1,936,622 | - | 1,364 | 2,222,224 | 12 | 9,907 | 9,448,114 | 7.4 | 0.027 | 0.35 | 3.05 | 24.9 | 3.0 | 24.9 | 3.0 |
| Nov-08 | 1,277,802 | - | 1,488 | 1,709,523 | 14 | 6,907 | 6,906,617 | 8.2 | 0.031 | 0.38 | 2.30 | 27.1 | 2.3 | 27.1 | 2.3 |
| Dec-08 | 422,427 | - | 1,578 | 1,200,081 | 15 | 84 | 81,337 | 8.2 | 0.000 | 0.38 | 2.30 | 28.0 | 2.3 | 28.0 | 2.3 |
| Jan-09 | 1,259,504 | - | 1,651 | 3,128,703 | 18 | 48,065 | 44,817,4 | 8.8 | 0.021 | 0.40 | 2.63 | 30.7 | 2.6 | 30.7 | 2.6 |
| Feb-09 | 1,216,232 | - | 1,769 | 1,878,782 | 20 | 20 | 18,37 | 8.6 | 0.000 | 0.40 | 2.39 | 35.0 | 2.4 | 35.0 | 2.4 |
| Mar-09 | 1,483,877 | - | 1,881 | 1,705,959 | 22 | 26 | 25,18 | 8.6 | 0.000 | 0.40 | 2.77 | 35.8 | 2.8 | 35.8 | 2.8 |
| Apr-09 | 1,359,622 | - | 1,881 | 1,705,959 | 22 | 26 | 25,18 | 8.6 | 0.000 | 0.40 | 2.77 | 35.8 | 2.8 | 35.8 | 2.8 |
| May-09 | 1,434,822 | - | 1,881 | 1,705,959 | 22 | 26 | 25,18 | 8.6 | 0.000 | 0.40 | 2.77 | 35.8 | 2.8 | 35.8 | 2.8 |
| Jun-09 | 1,391,067 | - | 1,765 | 2,470,538 | 21 | 50,56 | 2,060,218 | 8.0 | 0.014 | 0.37 | 2.45 | 32.7 | 2.4 | 32.7 | 2.4 |
| Jul-09 | 1,313,627,954 | - | 1,705 | 1,878,782 | 21 | 11,941 | 11,665,37 | 5.8 | 0.054 | 0.27 | 2.07 | 32.5 | 2.0 | 32.5 | 2.0 |
| Aug-09 | 1,464,474 | - | 1,552 | 1,168,108,499 | 22 | 5,889 | 5,889,142 | 6.0 | 0.027 | 0.28 | 2.50 | 31.6 | 2.5 | 31.6 | 2.5 |
| Sep-09 | 1,303,951 | - | 1,572 | 1,451,1 | 22 | 2,006 | 2,000,004 | 5.8 | 0.009 | 0.26 | 2.66 | 31.0 | 2.6 | 31.0 | 2.6 |
| Oct-09 | 1,340,191 | - | 1,508 | 1,484,195 | 23 | 10,55 | 10,186 | 4.5 | 0.005 | 0.21 | 2.34 | 26.9 | 2.3 | 26.9 | 2.3 |
| Nov-09 | 1,411,674 | - | 1,455 | 1,404,1 | 21 | 14,53 | 14,074,9 | 4.1 | 0.007 | 0.19 | 2.20 | 28.6 | 2.2 | 28.6 | 2.2 |
| Dec-09 | 1,395,623 | - | 1,013 | 1,371,273 | 22 | 30,98 | 29,903 | 3.7 | 0.014 | 0.17 | 2.76 | 29.4 | 2.7 | 29.4 | 2.7 |
| Jan-10 | 1,733,233 | - | 1,947 | 1,654,788 | 19 | 28,839 | 27,944,411 | 4.1 | 0.018 | 0.18 | 3.36 | 31.8 | 3.3 | 31.8 | 3.3 |
| Feb-10 | 1,982,986 | - | 1,662 | 1,912,08,829 | 23 | 3,006 | 4,717,113 | 4.1 | 0.018 | 0.18 | 4.11 | 35.2 | 4.1 | 35.2 | 4.1 |
| Mar-10 | 1,750,783 | - | 1,716 | 3,382,3,483,014 | 25 | 13,303 | 12,934,41 | 5.3 | 0.053 | 0.25 | 4.53 | 35.5 | 4.5 | 35.5 | 4.5 |
| Max. Rolling 12 Months | 1,864,739 | - | 1,803 | 4,684,163 | 28 | 27,191 | 21,882,95 | 7.5 | 0.109 | 0.35 | 5.08 | 37.8 | 5.0 | 37.8 | 5.0 |
| Exceeds Permit Limit? | | | 2,987 | | | 854 | | 94.3 | | 1.00 | | 97.68 | 10.0 | | |
| Excess Emissions (Max. Rolling 12 Months) | | | -1024 | | | -826 | | -27.8 | | -1.49 | | -59.00 | -13.40 | | |
| Excess Emissions (Compliance Year) | | | -903 | | | -832 | | -27.9 | | -1.50 | | -61.86 | -12.96 | | |

*CEMS data columns calculate monthly emissions by summing the pounds per hour emissions for every hour during the month that the turbine was operating, including start-ups, shut-downs, and upsets. The CEMS uses the following methodology to estimate emissions as presented in this condition of the permit.

$$lb/hr = X * (hourly ppmv @ 15\% O_2) * (hourly fuel throughput)$$

$$lb/yr = X * (hourly ppmv @ 15\% O_2) * (annual fuel throughput) / 2000$$

$$X = (8.740 \text{ scf/MMBtu}) * ((NOx \text{ or } CO) \text{ (lb/mole)} * (20.9 / (20.9 - \%O_2))) * (lb-mole/387 \text{ scf}) * (E - 6) * HHV$$

where
 HHV = average HHV of fuel analysis over compliance year
 annual throughput = (from spreadsheet above)
 NOx = 40 lb/lb-mole
 CO = 28 lb/lb-mole

| X | Concentration (ppmv) | Max. Rolling 12-Months Throughput (MMBtu) | Emissions (lb/yr) | Emission Limits (lb/yr) | Excess Emissions |
|-----|----------------------|---|-------------------|-------------------------|------------------|
| NOx | 3.80 | 17.70 | 1,823 | 50.00 | NO |
| CO | 2.31 | 21.60 | 1,823 | 97.66 | NO |

*NOx and CO ppmv data from AIRS source last conducted 02/10/09.

Max. Rolling 12-Months Hours of Operation 6,927.10 hr/yr

5936 PERKINS ROAD
OXNARD, CA 93033

T (805) 986-3881
F (805) 488-5186

October 2, 2009

Lyle Olson
County of Ventura
Air Pollution Control District
669 County Square Drive, Second Floor
Ventura, CA 93003

Subject: Breakdown report - Steam Injection valve failed

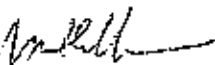
Dear Mr. Olson:

This letter is a follow up on a call made to the VCAPCD Breakdown Center Hotline on October 1, 2009 by Robyn Lebrilla at approximately 12:40 PM.

On October 1, 2009 at about 10:45 AM, the E&I Technician noticed that the turbine NOx emission was above the 12 ppm limit. He then notified the E&I Supervisor & the Environmental Engineer. Review of operational data showed low steam injection flow. Maintenance crew then checked the steam injection valve for NOx emission control, and found out that it was stuck open at 25%. This issue was corrected at about 11:45 AM by shutting down the steam injection and enabling it back again. To avoid future occurrences, the steam injection valve will be replaced.

This incident resulted to an excess NOx emission of about 23 lbs using the the 3-hour NOx running average of 19.75 ppm from 10:00 AM to 1:00 PM. The Dally Emission Sheets, PI trend, DCS Trends, Environmental Incident Report and Cogen Reports have been provided for your review. If you have any questions or require additional information, please call at (805) 271-7284.

Sincerely,



Robyn Lebrilla
Environmental Engineer

5936 PERKINS ROAD
OXNARD, CA 93033

T (805) 988-3881
F (805) 488-5186

August 28, 2009

Lyle Olson
County of Ventura
Air Pollution Control District
669 County Square Drive, Second Floor
Ventura, CA 93003

Subject: Excess NOx emissions due to ammonia valve control issue

Dear Mr. Olson:

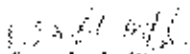
This letter is a follow up on a call made to the VCAPCD Breakdown Center Hotline on August 27, 2009 by Robyn Lebrilla at approximately 6:40 AM.

On August 26, 2009 at 11:37 PM, the turbine tripped due to low level on HP boiler. The turbine was powering up at 12:20 AM on August 27, 2009. However, at 12:28 AM the 52U breaker opened up which severed the connection between the mill and the power grid. It took the mill 32 minutes (12:28 AM to 1:00 AM) to close the breaker, at which point the mill started powering up. During the turbine power up, at about 2:45 AM, it was found out that the ammonia valve for NOx emission control did not engage. Operator manually opened the ammonia valve, and then afterwards put the valve into its normal operating mode.

This breakdown resulted to NOx excess emissions. Since the mill had unplanned load change at 12:28 PM, excess NOx emission was calculated starting at 2:28 PM (after the 2-hour unplanned load change exemption).

The total calculated excess emissions of NOx was 7.70 lbs using the 3-hour NOx running average of 14.43 ppm from 2:28 AM to 5:28 AM. The Daily Emission Sheets, PI trend, DCS Trends, and Cogen Reports have been provided for your review. If you have any questions or require additional information, please call at (805) 271-7284.

Sincerely,


Robyn Lebrilla
Environmental Engineer

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: 7.d. PO00157PC2 | Description: Turbine and Duct Burner Natural Gas Only Requirement |
|--|--|

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.

Fueled by natural gas only.

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: 7.e. 9000157PC2 | Description: Nebraska Boiler and Turbine Simultaneous Operation 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.

Annual compliance certification and records of operation of the Nebraska boiler (see 6.a. 74.15N3). The Nebraska boiler did not operate during compliance year.

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: 7.f. P000157PC2 | Description: Nebraska Boiler NOx Emission 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.

CEMS for fuel consumption, NOx, and O2. Daily zero and span drift checks when boiler is in operation. Strip chart recordings on file at facility.

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: 7.g. PG001S7PC2 | Description: |
|--|--|
| | Nebraska Boiler NOx and Oxygen Continuous Monitoring Requirements |

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

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

CEMS for fuel consumption, NOx, and O2. Daily zero and span drift checks when boiler is in operation.

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: 7.h. P000157PC2 | Description: Nebraska Boiler Fuel Oil Limitations |
|--|--|

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 diesel fuel was burned during the reporting period. Monthly records of the reason for firing fuel oil. Records of each fuel oil delivery including date and amounts. Obtain sulfur content of fuel from supplier. Fuel sulfur content: ASTM Method D4294-83 or D2622-87.

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: 7.i. 2000157PC2 | Description: Recordkeeping Requirements for the Nebraska Boiler Fuel Oil Limitations |
|--|---|

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 fuel oil was burned during the compliance year. Monthly records of the reason for firing fuel oil. Records of each fuel oil delivery including date and amounts. Obtain sulfur content of fuel from supplier. Fuel sulfur content: ASTM Method D4294-83 or D2622-87.

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: | Description: |
|---|--|
| 7. j. 9000157PC2 | Recordkeeping Requirements for the Maxon Duct Burner |

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.

Monitor time and duration of the Maxon Burner's use, and fuel consumption.
Fuel use attached to 6.a. 900157PC1.

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: 8.a. Rule 50 | Description: 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.

Stack opacity routinely observed by operator.
 Observations on 6/24/2009, 9/25/2009, 12/30/2009 and 3/10/2010 have been formally documented and are 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.”

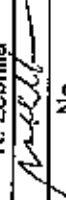
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6. Yes No During the time period covered by this compliance certification, do you have any other information or data that indicates that you are not in compliance?
7. If you answered "yes" to Question Nos. 4, 5, or 6 above, please identify all instances 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.

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Stack Opacity Observation Protocol

| | |
|---|---|
| Object: | Cogen Stack |
| Date of Observation: | 03/10/10 |
| Time of Observation: | 1:30 PM |
| Fuel burned: | Natural Gas |
| Name of the observing person: | R. Lebrilla |
| Signature |  |
| Was Visible Emission Other Than Steam Present ? | No |
| | |
| Object: | Nebraska Boiler |
| Date of Observation: | n/a |
| Time of Observation: | n/a |
| Fuel burned: | n/a |
| Name of the observing person: | n/a |
| Signature | n/a |
| Was Visible Emission Other Than Steam Present ? | n/a |

| | |
|---|---|
| Object: | Paper Forming |
| Date of Observation: | 03/10/10 |
| Time of Observation: | 1:30 PM |
| Fuel burned: | N/A |
| Name of the observing person: | R. Lebrilla |
| Signature |  |
| Was Visible Emission Other Than Steam Present ? | No |

| | |
|---|---|
| Object: | Paper Drying: Maxon Burner |
| Date of Observation: | 03/10/10 |
| Time of Observation: | 1:30 PM |
| Fuel burned: | N/A |
| Name of the observing person: | R. Lebrilla |
| Signature |  |
| Was Visible Emission Other Than Steam Present ? | No |


Stack Opacity Observation Protocol

| | |
|--|--------------------|
| Object: | Cogen Stack |
| Date of Observation: | 12/24/09 |
| Time of Observation: | 1:00 PM |
| Fuel burned: | Natural Gas |
| Name of the observing person: | R. Lebrilla |
| Signature | <i>R. Lebrilla</i> |
| Was Visible Emission Other Than Steam Present ? | No |
| Object: | Nebraska Boiler |
| Date of Observation: | n/a |
| Time of Observation: | n/a |
| Fuel burned: | n/a |
| Name of the observing person: | n/a |
| Signature | n/a |
| Was Visible Emission Other Than Steam Present ? | n/a |


| | |
|--|--------------------|
| Object: | Paper Forming |
| Date of Observation: | 12/24/09 |
| Time of Observation: | 1:00 PM |
| Fuel burned: | N/A |
| Name of the observing person: | R. Lebrilla |
| Signature | <i>R. Lebrilla</i> |
| Was Visible Emission Other Than Steam Present ? | No |


| | |
|--|----------------------------|
| Object: | Paper Drying: Maxon Burner |
| Date of Observation: | 12/24/09 |
| Time of Observation: | 1:00 PM |
| Fuel burned: | N/A |
| Name of the observing person: | R. Lebrilla |
| Signature | <i>R. Lebrilla</i> |
| Was Visible Emission Other Than Steam Present ? | No |

Stack Opacity Observation Protocol

| | |
|--|---|
| Object: | Cogen Stack |
| Date of Observation: | 09/25/09 |
| Time of Observation: | 10:30 AM |
| Fuel burned: | Natural Gas |
| Name of the observing person: | R. Lebrilla |
| Signature |  |
| Was Visible Emission Other Than Steam Present ? | No |

| | |
|--|-----------------|
| Object: | Nebraska Boiler |
| Date of Observation: | n/a |
| Time of Observation: | n/a |
| Fuel burned: | n/a |
| Name of the observing person: | n/a |
| Signature | n/a |
| Was Visible Emission Other Than Steam Present ? | n/a |

| | |
|--|---|
| Object: | Paper Forming |
| Date of Observation: | 09/25/09 |
| Time of Observation: | 10:30 AM |
| Fuel burned: | N/A |
| Name of the observing person: | R. Lebrilla |
| Signature |  |
| Was Visible Emission Other Than Steam Present ? | No |

| | |
|--|---|
| Object: | Paper Drying: Maxon Burner |
| Date of Observation: | 09/25/09 |
| Time of Observation: | 10:30 AM |
| Fuel burned: | N/A |
| Name of the observing person: | R. Lebrilla |
| Signature |  |
| Was Visible Emission Other Than Steam Present ? | No |

Stack Opacity Observation Protocol

| | |
|---|--------------------|
| Object: | Cogen Stack |
| Date of Observation: | 06/24/09 |
| Time of Observation: | 10:00 AM |
| Fuel burned: | Natural Gas |
| Name of the observing person: | R. Lebrilla |
| Signature | <i>R. Lebrilla</i> |
| Was Visible Emission Other Than Steam Present ? | No |
| Object: | Nebraska Boiler |
| Date of Observation: | n/a |
| Time of Observation: | n/a |
| Fuel burned: | n/a |
| Name of the observing person: | n/a |
| Signature | n/a |
| Was Visible Emission Other Than Steam Present ? | n/a |

| | |
|---|--------------------|
| Object: | Paper Forming |
| Date of Observation: | 06/24/09 |
| Time of Observation: | 10:00 AM |
| Fuel burned: | N/A |
| Name of the observing person: | R. Lebrilla |
| Signature | <i>R. Lebrilla</i> |
| Was Visible Emission Other Than Steam Present ? | No |

| | |
|---|----------------------------|
| Object: | Paper Drying; Maxon Burner |
| Date of Observation: | 06/24/09 |
| Time of Observation: | 10:00 AM |
| Fuel burned: | N/A |
| Name of the observing person: | R. Lebrilla |
| Signature | <i>R. Lebrilla</i> |
| Was Visible Emission Other Than Steam Present ? | No |

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COMPLIANCE CERTIFICATION PERMIT FORM
 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: 8.b. Rule 54.B.1 | Description: Sulfur Compounds - SOx at Point of Discharge |
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

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

Follow monitoring requirements under Rule 64.
 Compliance with Rule 64 ensures compliance with this rule based on District analysis.

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

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

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

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

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

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

04 / 01 / 2009 (MM/DD/YY) to 03 / 31 / 2010 (MM/DD/YY)

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Applicable Requirement or Part 70 Permit Condition

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|---|---|
| Citation, including Attachment Number and/or Permit Condition Number: 8.c. Rule 54.B.2 | Description: Sulfur Compounds - SO _x at or Beyond Property Line |
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Attach to this form any information specifically required to be submitted with the compliance certification in the applicable requirement or Part 70 permit condition.

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

Compliance by use of PUC quality natural gas as discussed in VCAPCD memo dated 5/23/96 (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."