

Ventura County Air Pollution Control District

**Compliance Certification
Permit Form
Title V**

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VENTURA COUNTY
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A.P.C.D.

EF Oxnard LLC
Oxnard Energy Facility
November 8, 2010



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


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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.

<p>Signature and Title of Responsible Official:</p> <p>Title: General Manager </p>	<p>Date:</p> <p>11-8-10</p>
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<p>Time Period Covered by Compliance Certification</p> <p><u>10</u> / <u>01</u> / <u>09</u> (MM/DD/YY) to <u>09</u> / <u>30</u> / <u>10</u> (MM/DD/YY)</p>
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ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 10 / 01 / 09 (MM/DD/YY) to 09 / 30 / 10 (MM/DD/YY)

A. Attachment # or Permit Condition #: STRMLN214-NOx,CO,NH3	B. Equipment description: Gas Turbine GE LM6000 PC SPRINT	C. Deviation Period: Date & Time Begin: <u>June 9, 2010 1630</u> End: <u>June 9, 2010 1700</u> When Discovered: Date & Time <u>June 9, 2010 1630</u>
D. Parameters monitored: PPM NOx @ 15% O2	E. Limit: 2.0ppmvd NOx @ 15% O2 averaged over 1 clock hour	F. Actual: 6.9ppm NOx @15% O2
G. Probable Cause of Deviation: Automatic control system error causes ammonia flow to cease to the SCR injection grid. The ammonia gas solenoid valve had shut due to an erroneous momentary loss of indicated dilution air flow.		H. Corrective actions taken: Operator regained ammonia gas flow to the SCR injection grid to suppress NOx. The control system was optimized to prevent further spurious events. A filtered time constant of 60 seconds was added to the dilution air flow input signal. This effectively improves the quality of the signal.

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: Date & Time Begin: _____ End: _____ When Discovered: Date & Time _____
D. Parameters monitored:	E. Limit:	F. Actual:
G. Probable Cause of Deviation:		H. Corrective actions taken:

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: Date & Time Begin: _____ End: _____ When Discovered: Date & Time _____
D. Parameters monitored:	E. Limit:	F. Actual:
G. Probable Cause of Deviation:		H. Corrective actions taken:



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ANNUAL COMPLIANCE CERTIFICATION

SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 10 / 01 / 09 (MM/DD/YY) to 09 / 30 / 10 (MM/DD/YY)

A. Emission Unit Description: Gas Turbine GE LM6000 PC SPRINT			B. Pollutant: NOx
C. Measured Emission Rate: 1.3ppm @15% O2	D. Limited Emission Rate: 2.0ppm @ 15%O2	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 06/08/10

A. Emission Unit Description: Gas Turbine GE LM6000 PC SPRINT			B. Pollutant: NOx
C. Measured Emission Rate: 2.39 lb/hr	D. Limited Emission Rate: 41.44 lb/hr	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 06/08/10

A. Emission Unit Description: Gas Turbine GE LM6000 PC SPRINT			B. Pollutant: CO
C. Measured Emission Rate: 5.0ppm @ 15% O2	D. Limited Emission Rate: 24ppm @ 15%O2	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 06/08/10

A. Emission Unit Description: Gas Turbine GE LM6000 PC SPRINT			B. Pollutant: CO
C. Measured Emission Rate: 5.44 lb/hr	D. Limited Emission Rate: 24.21 lb/hr	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 06/08/10

A. Emission Unit Description: Gas Turbine GE LM6000 PC SPRINT			B. Pollutant: NH3
C. Measured Emission Rate: 0.3ppm @ 15%O2	D. Limited Emission Rate: 5.0ppm @ 15%O2	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 06/08/10



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A. Emission Unit Description: Gas Turbine GE LM6000 PC SPRINT			B. Pollutant: NH3
C. Measured Emission Rate: 0.20 lb/hr	D. Limited Emission Rate: 3.06 lb/hr	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 06/08/10

A. Emission Unit Description: Gas Turbine GE LM6000 PC SPRINT			B. Pollutant: ROC
C. Measured Emission Rate: <0.4ppm @ 15%O2	D. Limited Emission Rate: 2.0ppm @ 15%O2	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 06/08/10

A. Emission Unit Description: Gas Turbine GE LM6000 PC SPRINT			B. Pollutant: ROC
C. Measured Emission Rate: <0.22 lb/hr	D. Limited Emission Rate: 1.15 lb/hr	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 06/08/10

A. Emission Unit Description: Gas Turbine GE LM6000 PC SPRINT			B. Pollutant: SO2
C. Measured Emission Rate: 0.12 lb/hr	D. Limited Emission Rate: 0.26 lb/hr	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 06/08/10

A. Emission Unit Description:			B. Pollutant:
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test or	F. Test Date:



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Period Covered by Compliance Certification: 10 / 01 / 09 (MM/DD/YY) to 09 / 30 / 10 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: STRMLN214-NOx, CO, NH3</p>	<p>D. Frequency of monitoring: Annual source test, CEMS, Annual Compliance Certification</p>
<p>B. Description: Gas Turbine emission limits for NOx, CO, NH3</p> <p>LM5000 Gas Turbine removed 2/28/10 OLD LIMITS NOx – 23.94 Tons per year, 150 lbs/hr, 4.1 ppm w/out duct burner, 4.6 ppm with duct burner. CO - 105.96 Tons per year, 48.48 lb/hr. NH3- 42.4 Tons per year, 13.13 lbs/hr.</p> <p>LM6000 Gas Turbine Installed 4/1/10 NEW LIMITS NOx-14.62 Tons per year. 41.44 lbs/hr, 2.0ppm. CO-98.42 Tons per year, 24.21 lbs/hr, 24ppm, NH3-12.44 Tons per year, 3.06 lbs/hr, 5.0ppm.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p> <p>NOx EPA mtd 20; CO ARB Mtd 100; ROC EPA Mtd 25 or 18; O2 ARB Mtd 100; NH3 BAAQMD Mtd ST-1B</p>
<p>C. Method of monitoring: Annual Source test, CEMS for Nox, CO, O2 & control system operating parameters, procedures, maintenance log, quarterly CEMS reports to District. See attached Source Test Summary Form.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>I</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>Y</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: STRMLN214-SOx</p>	<p>D. Frequency of monitoring: Annual Source Test, Annual Compliance Certification</p>
<p>B. Description: Sulfur Content of Fuels</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: We only burn PUC quality natural gas. Annual source testing. See attached Annual Source Testing Form</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PO0214PC1 - Condition No. 1</p>	<p>D. Frequency of monitoring: Daily Meter Readings, CEMS calculates fuel use, Monthly CEMS Reports</p>
<p>B. Description: General Record Keeping for Fuel Limits</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Daily meter readings are incorporated into monthly production management records. CEMS calculates fuel use to date. SoCal Gas system contains historical usage in daily or monthly formats and provides 12 month historical usage on each month's bills. For this reporting period the duct burner consumed 0 MMSCF. The LM5000 gas turbine consumed 650.6 MMSCF from 10/1/09 to 02/28/10. The new LM6000 consumed 606.6 MMSCF from 4/1/10 to 9/30/10. A total of 1257.2 MMSCF was consumed during the reporting period.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: PO0214PC1-Condition No. 2</p>	<p>D. Frequency of monitoring: None</p>
<p>B. Description: Natural Gas Only for Gas Turbine</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Gas Turbine can only operate on Natural Gas, no other fuel is available.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PO0214PC1-Condition No.3</p>	<p>D. Frequency of monitoring: None</p>
<p>B. Description: Solvent Record Keeping</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Only aerosol solvents are used and those are purchased in containers of 1 liter or less. Pursuant to Rule 23.F.11 aerosol solvents are exempt from this permit</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PO0214PC1-Condition No. 4</p>	<p>D. Frequency of monitoring: Daily and monthly</p>
<p>B. Description: Emissions from the Gas Turbine Based Cogeneration Unit shall not exceed the following limits: OLD LM 5000, 190 lbs/day NOx, 23.94 tons/year NOx, 105.96 tons/year CO. NEW LM 6000, 14.62 tons/year NOx, 98.42 tons/year CO</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: CEMS records daily emissions of both CO and NOx. Daily or 12 month totals for NOx are compared to applicable limits for compliance. The LM5000 produced a total of 8.313 tons CO from 10/01/09 to 02/28/10. The LM 6000 produced a total of 4.372 tons CO from 04/01/10 to 09/30/10. A total of 12.685 tons CO rolling total were produced during this certification period. The LM5000 produced 5.061 tons NOx from 10/01/09 to 02/28/10. The LM6000 produced 2.130 tons NOx from 04/01/10 to 09/30/10. 7.191 tons NOx rolling total were produced during the certification period.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



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Period Covered by Compliance Certification: 10 / 01 / 09 (MM/DD/YY) to 09 / 30 / 10 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Rule 50</p>	<p>D. Frequency of monitoring: Annual Compliance Certification,</p> <p>Observation made on 06/08/10</p>
<p>B. Description: Opacity</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Per EPA Method 9</p>
<p>C. Method of monitoring: Certified observer conducted the survey. Highest opacity reading was indicated to be 0, as indicated on the Visible Emission Observation Form contained within the June 6, 2010 Source Test.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 54.B.1</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Sulfur compounds in excess of 300ppm</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Compliance attained through use of PUC quality natural gas. Compliance with Rule 64 ensures compliance with this rule based on District analysis.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 54.B.2</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Sulfur content of fuel used.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Gas Turbine only uses PUC quality natural gas. Diesel fuel for emergency fire pump uses CARB Ultra Low Sulfur content fuel.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>



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A. Attachment # or Permit Condition #: Rule 57.1	D. Frequency of monitoring: Annual Compliance Certification
B. Description: Combustion Contaminants – Specific – Fuel Burning Equipment	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Not required base upon District analysis	F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: Rule 64.B.1	D. Frequency of monitoring: Annual Compliance Certification
B. Description: Sulfur Content of Fuels – Gaseous Fuel Requirement	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Compliance attained through use of PUC quality natural gas as the only fuel used in Gas Turbine.	F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: Rule 64.B.2	D. Frequency of monitoring: Annual Compliance Certification
B. Description: Sulfur content of fuel used.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Liquid fuel is combusted only in the emergency fire pump. Please see the attached invoice indicating CARB Ultra Low Sulfur Dyed Diesel.	F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form



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Period Covered by Compliance Certification: 10 / 01 / 09 (MM/DD/YY) to 09 / 30 / 10 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Rule 74.1</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Abrasive Blasting</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Should sandblasting be necessary we will perform routine surveillance and visual inspections during abrasive blasting operations. We will also keep records from the contractor indicating the type of abrasive used.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p><i>*If yes, attach Deviation Summary Form</i></p>

<p>A. Attachment # or Permit Condition #: Rule 74.2</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Architectural Coatings</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Routine surveillance of application process. Purchase of compliant coating products. Maintain VOC records of coatings used.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p><i>*If yes, attach Deviation Summary Form</i></p>

<p>A. Attachment # or Permit Condition #: Rule 74.4.D</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Cutback Asphalt-Road Oils. Shall contain no more than 0.5% of organic compounds which boil at less than 500 F as determined by ASTM D402</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable ASTM D402</p>
<p>C. Method of monitoring: Request and retain certification from paving vendor whenever paving or patching work is performed on our 1.6 acre parcel. In March of 2010 asphalt repair work adjacent to the gas turbine crane pad was performed. Approximately 13.9 tons (191.7ft3) of 3/8" asphalt was used.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p><i>*If yes, attach Deviation Summary Form</i></p>



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Period Covered by Compliance Certification: 10 / 01 / 09 (MM/DD/YY) to 09 / 30 / 10 (MM/DD/YY)

A. Attachment # or Permit Condition #: Rule 74.6	D. Frequency of monitoring: Annual Compliance Certification
B. Description: Surface Cleaning and Degreasing	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: All solvents used are aerosol solvents in less than 1-liter containers and therefore are exempt from Rule 74.6	F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: Rule 74.11.1	D. Frequency of monitoring: Annual Compliance Certification
B. Description: Large Water Heaters and Small Boilers	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: No large water heaters or small boilers are on site.	F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: Rule 74.22	D. Frequency of monitoring: Annual Compliance Certification
B. Description: Future installation of natural gas-fired, fan-type furnaces.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Applies to future installations only. No natural gas fired furnaces are on site.	F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form



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<p>A. Attachment # or Permit Condition #: 74.9N7 Rule 74.9.D.3</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Emergency Standby Fire Pump Engine, used for fire suppression. Annual testing hours and fuel type records.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: The Emergency Standby Engine, 121 BHP Caterpillar Diesel Fired, used for emergency fire suppression was tested weekly for 20 minutes per test run. The annual engine testing hours are 17.6 hours. Rule allows 50 hours per year testing. Liquid fuel for emergency fire pump engine uses ultra low sulfur content fuel.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: ATCM Engine N1</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Hours of operation for maintenance and testing of Emergency Standby Fire Pump Engine</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Weekly the Emergency Standby Fire Pump Engine is tested. The engine is operated for approximately 20 during the testing. The engine is equipped with a non-resettable hour meter. The hours are logged before and after the test run and documented in the Weekly Safety Checklist. The annual engine testing hours are 17.6 hours. Liquid fuel for emergency fire pump engine uses ultra low sulfur content fuel.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 55</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>Description: Fugitive Dust</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: There are no operations, disturbed surface areas, or man-made conditions at this stationary source that are subject to Rule 55. This facility is paved with asphalt or concrete.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: 40 CFR.61.M</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: National Emission Standard for Asbestos, Asbestos Demolition or Renovation</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Facility was built in 1990 using no asbestos materials, therefore no monitoring or recordkeeping is required.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 40 CFR Part 68, Risk Management Plans</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Lists of Regulated Substances & Thresholds for Accidental Release Prevention</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: June 21, 1999, EF Oxnard, Inc. filed an RMP with the Oxnard CUPA. The RMP contained a hazard assessment; and accidental release prevention program; an emergency response program; a 5 year accident history & a certification statement. On Dec. 27, 1999, EF Oxnard, Inc. held a public meeting to discuss the Offsite Consequence Analysis. The FBI was notified that the public meeting was held, by certified letter dated Jan. 4, 2000. The most recent RMP 5 year update was submitted on Jun. 21, 2009 to Oxnard CUPA, The current Hazardous Waste and Hazardous Materials Management Regulatory Program Permit # 02-0030 dated Aug. 1, 2010.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 40 CFR Part 82</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>Description: Protection of Stratospheric Ozone</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: No motor vehicle repairs are done at the facility. The company truck is serviced by authorized repair centers. No maintenance on, or service of, repair of, or disposal of appliances is done at this facility.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 10 / 01 / 09 (MM/DD/YY) to 09 / 30 / 10 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 40 CFR Parts 72 - 78</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Permit Shield - Acid Rain Program "Sulfur Dioxide Allowance System" "Sulfur Dioxide Opt-Ins" "Continuous Emission Monitoring"</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Pursuant to 40 CFR Pt 72.6(b)(5), a qualifying facility (QF) is not an affected unit subject to the requirements of the Acid Rain Program if it has, as of Nov. 15, 1990, one or more QF power purchase commitments to sell at least 15% of its total planned net output capacity; & consists of one or more units designated by the owner or operator with a total installed net output capacity not exceeding 130% of the total planned net output capacity. Since this cogeneration unit is a QF and sells greater than 15% of the total planned net output capacity through qualifying power purchase commitments, and has a total installed net output capacity that does not exceed 130% of the total planned net output capacity, it is not subject to the Acid Rain Program.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #:</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description:</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring:</p>	<p>F. Currently in Compliance? (Y or N): <u> </u></p> <p>G. Compliance Status? (C or I): <u> </u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u> </u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #:</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>C.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C.</p>	<p>F. Currently in Compliance? (Y or N): <u> </u></p> <p>G. Compliance Status? (C or I): <u> </u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u> </u></p> <p>*If yes, attach Deviation Summary Form</p>

**Capital Power
Corporation**



EF Oxnard LLC
660 Diaz Avenue
Oxnard, CA. 93030
Ph. (805)386-6375 Fax. (805) 486-6598

November 8, 2010

Mr. Lyle Olson
Ventura County Air Pollution Control District
669 County Square Drive
Ventura, CA 93003

RE; Semi-Annual Fuel Use Report

Dear Lyle:

This letter will constitute the semi-annual report submitted as required by the District.

1. The gas turbine is a General Electric LM6000, located at 550 Diaz Avenue, Oxnard, CA.
2. Fuel usage for the 12 months ending September 30, 2010 was 1,235,406.8 mmbtu.
The turbine was in operation for 3126 hours for the 12 months ending September 30, 2010.
3. The annual air test was performed on June 8, 2010.

Please contact me if you have any questions.

Sincerely,

Dave Sweigart
General Manager

DS*pa VCAPCD Olson 11-08-10