



Vintage Production California LLC

A subsidiary of Occidental Petroleum Corporation 

270 Quail Court, Suite 201
Santa Paula, California 93060
Phone 805.525.8008, Fax 805.525.7372

February 9, 2012

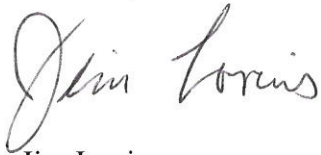
Mr. Gerardo Rios, Chief
Permits Office (AIR-3)
Office of Air Division
EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105

Dear Mr. Rios,

The purpose of this correspondence is to transmit to your office the enclosed Annual Title V report for the Tenby facility, Title V PTO 00012. Vintage Production California LLC purchased the facility on December 29, 2011. The report is based the information available to Vintage after closure of the sale.

Should you have any further questions or require additional information please contact me at (805) 933-5661.

Sincerely,



Jim Lovins
HES Consultant
Vintage Production California LLC

RECEIVED
VENTURA COUNTY
12 FEB 10 PM 1:12
A.P.C.D.



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION SIGNATURE COVER FORM

A copy of each Annual Compliance Certification shall be submitted to Ventura County APCD, at the following address:

Mr. Dan Searcy, Manager Enforcement
Ventura County Air Pollution Control District
669 County Square Drive
Ventura, CA 93003

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: VPC S. Operations Lead Title: <i>William E. Searcy</i>	Date:
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Time Period Covered by Compliance Certification __01__ / __01__ / __2011__ (MM/DD/YY) to 12 / __31__ / __2011__ (MM/DD/YY)



Ventura County
Air Pollution
Control District

**ANNUAL COMPLIANCE CERTIFICATION
SIGNATURE COVER FORM**

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Permits Office (AIR-3)
Office of Air Division
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San Francisco, CA 94105

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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><i>VPC S. Operations Lead</i></p> <p>Title: <i>William E. Lweeney</i></p>	<p>Date:</p>
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<p>Time Period Covered by Compliance Certification</p> <p>__01__ / __01__ / __2011__ (MM/DD/YY) to __12/ __31__ / __2011__ (MM/DD/YY)</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 11 (MM/DD/YY) to 12/31/2011 (MM/DD/YY)

<p>A. Attachment # or Permit Condition w 71.1 N1</p>	<p>D. Frequency of monitoring: Quarterly and Daily Visual Inspection</p>
<p>B. Description: RULE 71.1.8.1a Tanks Equipped with Vapor Recovery RULE 74.10 Other Tank Components Subject to the Leak Requirements of Rule 74.10. Applies to all tanks at this stationary source equipped with vapor recovery.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Quarterly Inspections for proper operation of Gas Compressors, Relief Valves, Hatches, Tank Vapor Recovery System, pressure Regulators, and Other Tank Components. Annual Verification That Tanks are Equipped with Vapor Recovery. Verbal Notice of Maintenance Activities. 7410 Inspections and Records. This serves as notification that tanks are equipped with vapor recovery. This facility complies with 71.1.B.1a</p>	<p>F. Currently in Compliance? (Y or N): Y</p>
	<p>G. Compliance Status? (C or I): C</p>
	<p>H. *Excursions, exceedances, or other non-compliance? (Y or N): N</p>
	<p>'If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #. 71.3N4</p>	<p>D. Frequency of monitoring: Routine Surveillance During Loading Operations to ensure Compliance with 71.3</p>
<p>B. Description: Rules 71.71.3. B.2.& I. ROC Liquid Loading facilities Transfer of Reactive Organic Compound liquids. Specifically, this attachment Applies to loading facilities equipped with a bottom-loaded vapor recovery System and equipped with a District approved alternative primary and secondary overflow protection system.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Annual Compliance Certification. Routine Surveillance During Loading Operations to ensure Compliance with 71.3 Annually Monitor and Record at-least one complete loading operation utilizing an appropriate analyzer. A Bacharach TLV is used for monitoring. .</p>	<p>F. Currently in Compliance? (Y or N): Y</p>
	<p>G. Compliance Status? (C or I): C</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 #: 71.3N6</p>	<p>D. Frequency of monitoring: Routine Surveillance During Loading Operations to ensure Compliance with 71.3.E.1</p>
<p>B. Description: RULE S 71.3.E.1 ROC Liquid Loading Facilities Low Vapor Pressure Exemption. Applies to Asphalt Loading Racks Only.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Annual Compliance Certification. Routine Surveillance During Loading Operations to ensure Compliance with 71.3.E.1 Annually determine if the modified Reid Vapor Pressure of all products at these loading facilities is less than 0.5 psia</p>	<p>F. Currently in Compliance?(Y or N): Y</p>
	<p>G. Compliance Status? (C or 1): C</p>
	<p>H. *Excursions, exceedances, or other non-compliance? (Y or N): N</p>
	<p>If yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: _01 / _01 / _11 (MM/DDIYY) to _12/31/2011 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 74.9N7</p> <p>B. Description: Rule 74.9N7 Stationary Internal Combustion Engines.</p>	<p>D. Frequency of monitoring:</p> <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Exemption from Rule 74.9 for emergency standby engines operated either during an emergency or maintenance operations.</p>	<p>F. Currently in Compliance? (Y or N): Y</p> <p>G. Compliance Status? (Cori): C</p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): N</p> <p>•11 yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: 74.15.N1</p> <p>B. Description: RULE 74.15.8.1 Boilers, Steam generators and Process Heaters with a maximum heat input rating greater than or equal to 5 MMBTU/Hr. Nox and CO Emission Limits. Applies to steam generators no. 0,1,2,3,4, and 5. Boiler #7 and the Natco crude oil process heater (Retort).</p>	<p>0. Frequency of monitoring: .Daily records of alternate fuel consumption. (No alternate fuel was burned in 2010)</p> <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: See Attachments CARB Method 1-100</p>
<p>C. Method of monitoring: Annual Compliance Certification. Biennial Source Testing</p>	<p>F. Currently in Compliance? (Y or N): Y</p> <p>G. Compliance Status? (C or i): C</p> <p>H.*Excursions, exceedances, or other non-compliance? (Y or N): N</p> <p>if yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: 74.15.II1</p> <p>B. Description: Rule 74.15.1.B.1 Boilers, Steam Generators and Process Heaters with a maximum heat input rating greater than or equal to 1 MMBTU/hr. and less than 5 MMBTUThr. Nox and CO Emission Limits. Applies to Asphalt Heaters PI and 12001.</p>	<p>D. Frequency of monitoring: Daily records of alternate fuel consumption. (No alternate fuel was burned in 2010)</p> <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Attachments CARB Method 1-100</p>
<p>C. Method of monitoring: Annual Compliance Certification. Biennial Source Testing. Daily records of alternate fuel consumption. (No alternate fuel was burned in 2011) See attachment for source testing records.</p>	<p>F. Currently in Compliance? (Y or N): Y</p> <p>G. Compliance Status? (Cori): C</p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): Y</p> <p>*If yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 01 / 01 / 11 (MM/DD/YY) to 12 / 31 / 11 (MM/DD/YY)

A. Attachment # or Permit Condition #: <p style="text-align: center;">74.15.1N1</p>	B. Equipment description: <p style="text-align: center;">NATCO Oil Heater</p>	C. Deviation Period: Date & Time Begin: July 6, 2011 End: When Discovered: Date & Time July 6, 2011
D. Parameters monitored:	E. Limit:	F. Actual:
G. Probable Cause of Deviation: Failure to source test within 24 months		H. Corrective actions taken: <p style="text-align: center;">Source test scheduled and completed . Results dated July 21, 2011</p>

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:



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION

SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: __01__ / __01__ / __11__ (MM/DD/YY) to __12__ / __31__ / __12__ (MM/DD/YY)

A. Emission Unit Description: NATCO Oil Heater			B. Pollutant: NOx
C. Measured Emission Rate: 11.6 ppm	D. Limited Emission Rate: 34 ppm	E. Specific Source Test or Monitoring Record Citation:	F. Test Date: Report date: 7/21/11

A. Emission Unit Description: NATCO Oil Heater			B. Pollutant: CO
C. Measured Emission Rate: 23.4 ppm	D. Limited Emission Rate: 400 ppm	E. Specific Source Test or Monitoring Record Citation:	F. Test Date: J Report date: 7/21/11

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

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

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

Table 2-1
Summary of Results
Tenby Inc
Retort
July 21, 2011

Run	1	Emission Limit
Oxygen, %	8.75 /	
Carbon Dioxide, %	7.00 /	
Flow Rate, dscfm	2,727 /	
Oxides of Nitrogen,		
ppm	11.6 /	
ppm @ 3% O ₂	17.1 /	34
lb/hr	0.227 /	
Carbon Monoxide,		
ppm	23.4 /	
ppm @ 3% O ₂	34.5 /	400
lb/hr	0.279 /	
Operating Parameters,		
Load, %	54.6 /	
Heat Rate, MMbtu/hr	10.9 /	



Ventura County
Air Pollution
Control District

669 County Square Drive 2nd Flr.
Ventura CA 93003

Tel: 805/645-1400
Fax: 805/645-1444

NOTICE OF VIOLATION

No. 22626

Name: TENBY, INCORPORATED Date: July 6, 2011
 Address: P.O. Box 258 City/Zip: Oxnard 93032
 Inspection Address: 3450 E Fifth Street P.O./ID#: 00012
 City/Zip: Oxnard Phone: (805) 487-4798

You are hereby notified that a VIOLATION of RULE 74.15.B.1 of the Rules and Regulations of the Ventura County Air Pollution Control District, SECTION - of the California Health and Safety Code, SECTION - of the California Code of Regulations, was committed on July 6, 2011 by: failing to source test the combustion motor oil heater which 24 months of the previous test conducted on 5/11/2009. See attached notice to test dated 4/11/11

Pursuant to Section 42400 of the Health and Safety Code of the State of California, any person who violates any Order, Rule, or Regulation of the State Board or of an Air Pollution Control District is guilty of a MISDEMEANOR. Every day during any portion of which such violation occurs constitutes a separate offense.

ADVISE THIS DISTRICT, IN WRITING, WITHIN TEN (10) DAYS, OF THE CORRECTIVE ACTION TAKEN TO RESOLVE THIS VIOLATION. YOUR RESPONSE DOES NOT PRECLUDE THE POSSIBILITY OF FURTHER LEGAL ACTION.

Issued by (Signature) Lyle Olson Sector 11 Date 7/6/11 Time 1027

SIGNING THIS NOTICE ACKNOWLEDGES RECEIPT OF THIS NOTICE. IT IS NOT AN ADMISSION OF GUILT.

Issued To (please print) MURLEY CHASE Title (please print) CEO

Signature of Person Receiving Notice CERTIFIED MAIL Title _____ Date _____

Follow-up Action: _____

Disposition: _____

White-Office Copy Yellow-Field Copy Pink-Site Copy
C Dick Nali, Plant Superintendent, Tenby, Incorporated



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

July 28, 2011

TENBY, INC.
P.O. BOX 258
OXNARD, CA. 93032

Attention: Mr. DICK NALI

Regarding: VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
NOTICE OF VIOLATION

Notice Number	22626
Date of Violation	05/11/2011
Location of Violation	3450 E.5 th St., Oxnard
Rule and Section Violated	74.15.B.1
Permit to Operate Number	0012

This letter is in reference to the above Notice of Violation. The District would like to resolve this matter without the burden of litigation. This letter contains an offer of settlement based upon the District's policy for the settlement of violations.

Although California Health and Safety Code Section 42402 specifies civil penalties of up to \$10,000 per day for each day of violation, the reduced monetary amount of the District's offer specified below is derived from a schedule of penalties. This schedule of penalties takes into account the severity of the violation, the frequency of past violations and any corrective action taken by the violator.

I am authorized to offer to settle this matter based on the information available.

1. Payment of a mutual settlement penalty in the sum of ~~\$1,000.00~~ 500.⁰⁰
2. Submission of a written statement indicating proof of correction and present compliance unless previously submitted.
3. Release of the alleged violator from any and all claims for civil penalties which could arise out of any incident referenced in the above Notice(s) of violation.
4. Settlement shall not constitute an admission of violation conduct in any administrative or judicial proceeding.

If you are interested in settling this case without further legal proceedings, submit a statement of corrective action/compliance and a check in the amount of **\$1,000.00**, payable to the Ventura County Air Pollution Control District at 669 County Square Dr., 2nd Floor, Ventura, CA 93003, by **August 15, 2011**. Upon receipt of said amount, **TENBY, INC.** shall be released from liability under the terms as set forth above.

This letter constitutes an offer of settlement. If you wish to meet with District personnel to discuss this settlement, please contact me at 805/ 645-1446. We will discuss any information that you consider to be related to the settlement of this violation.

Thank you for your cooperation in bringing this matter to a close.

Sincerely,


Barry Mamaghany
Mutual Settlement Officer

Attachment: Copy of NOV 22626



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

Permit No. 00176

April 1, 2011

Morley Chase, CEO
Tenby, Incorporated
P. O. Box 258
Oxnard, CA 93032

RE: PROCESS HEATER TEST NOTICE

Permit No.: 00012

Location: 3450 E Fifth Street, Oxnard

Your company's Permit to Operate requires certain combustion equipment to be tested every 24 months. According to our records, the following equipment is due for 24-month source testing in the month of May 2011:

20 MMBTU/hr Natco oil heater

Test Protocol and Scheduling

You must submit a source test protocol before the test is conducted. Written approval of the protocol must be granted before conducting the test. If you will be using a previously submitted protocol, please tell us the date of the previous protocol. Most of the test protocols are prepared and submitted by the testing contractor.

Please notify us 15 days before the scheduled test date. Also, please contact us two (2) working days before the scheduled test date to confirm the test date, so we can arrange to observe the test. A report of the source test results must be submitted within 45 days of the date of the test.

Fees

The District charges fees for observing source tests and for the review of test reports. See District Rule 47 for an explanation of the fees we charge.

Questions?

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

The District cannot grant an extension beyond the 24-month anniversary date. If you are unable to test during this month, please contact Lyle Olson to discuss your options.

c. Dick Nali, Plant Superintendent, Tenby, Incorporated

ST00012



ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 01 / 01 / 11 (MM/DD/YY) to 12/31/2011 (MM/DD/YY)

A. Emission Unit Description: 20 MMBTU/HR NG STEAM GENERATOR #(0)			B. Pollutant: NOX
C. Measured Emission Rate: 32 ppmv at 3% O ₂	D. Limited Emission Rate: 40 ppmv at 3% O ₂	E. Specific Source Test or Monitoring Record Citation: Laboratory Report # 210-078	F. Test Date: June 22,2010

A. Emission Unit Description: 20 MMBTU/HR NG STEAM GENERATOR #(0)			B. Pollutant: CO
C. Measured Emission Rate: 0.2 ppmv at 3% O ₂	D. Limited Emission Rate: 400 ppmv at 3% O ₂	E. Specific Source Test or Monitoring Record Citation: Laboratory Report # 210-078	F. Test Date: June 22,2010

A. Emission Unit Description: 20 MMBTU/HR. NG STEAM GENERATOR #(1)			B. Pollutant: NOX
C. Measured Emission Rate: 35.4 ppmv at 3% O ₂	D. Limited Emission Rate: 40 ppmv at 3% O ₂	E. Specific Source Test or Monitoring Record Citation: Laboratory Report # 209-140	F. Test Date: July 6, 2011

A. Emission Unit Description: 20 MNIBTU/HR NG STEAM GENERATOR #(1)			B. Pollutant: CO
C. Measured Emission Rate: 0.4 ppmv at 3% O ₂	D. Limited Emission Rate: 400 ppmv at 3% O ₂	E. Specific Source Test or Monitoring Record Citation: Laboratory Report # 209-140	F. Test Date: July 6, 2011

A. Emission Unit Description: 20 MMBTU/HR NG STEAM GENERATOR #(2)			B. Pollutant: NOX
C. Measured Emission Rate: 26.9 ppmv at 3% O ₂	D. Limited Emission Rate: 40 ppmv at 3% O ₂	E. Specific Source Test or Monitoring Record Citation: Laboratory Report # 210-142	F. Test Date: November 19,2010

ANNUAL COMPLIANCE CERTIFICATION

SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 01 / 01 / 2011 (MM/DD/YY) to 12/31/2011 (MM/DD/YY)

A. Emission Unit Description: 20 MMBTU/HR NG STEAM GENERATOR #(2)			B. Pollutant: CO
C. Measured Emission Rate: 0.9 ppmv at 3% O ₂	Laboratory D. Limited Emission Rate: 400 ppmv at 3% O ₂	E. Specific Source Test or Monitoring Record Citation: Report # 210-142	F. Test Date: November 19, 2010

A. Emission Unit Description: 20 MMBTU/HR NG STEAM GENERATOR #(3) Unit was not operated in 2010			B. Pollutant: NOX
C. Measured Emission Rate: 27 ppmv at 3% O ₂	D. Limited Emission Rate: 40 ppmv at 3% O ₂	E. Specific Source Test or Monitoring Record Citation: Laboratory Report 4 296-077	F. Test Date: June 17, 1996

A. Emission Unit Description: 20 MMBTU/HR NG STEAM GENERATOR #(3) Unit was not operated in 2010	B. Pollutant: CO		
C. Measured Emission Rate: < 2 ppmv at 3% O ₂	D. Limited Emission Rate: 400 ppmv at 3% O ₂	E. Specific Source Test or Monitoring Record Citation: Laboratory Report # 296-077	F. Test Date: June 17, 1996

A. Emission Unit Description: 20 MMBTU/HR NG STEAM GENERATOR #(4)			B. Pollutant: NOX
C. Measured Emission Rate: 28.8 ppmv at 3% O ₂	D. Limited Emission Rate: 40 ppmv at 3% O ₂	E. Specific Source Test or Monitoring Record Citation: Laboratory Report # 210-033	F. Test Date: March 26, 2010

A. Emission Unit Description: 20 MMBTU/HR NG STEAM GENERATOR #(4)			B. Pollutant: CO
C. Measured Emission Rate: 1.3 ppmv at 3% O ₂	D. Limited Emission Rate: 400 ppmv at 3% O ₂	E. Specific Source Test or Monitoring Record Citation: Laboratory Report # 210-033	F. Test Date: March 26, 2010



ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 01 / 01 / 2011 (MM/DDNY) to 12/31/2011 (MM/DD/YY)

A. Emission Unit Description: 20 MMBTU/HR NG CRUDE OIL PROCESS HEATER (RETORT)			B. Pollutant: CO
C. Measured Emission Rate: 1 ppmv at 3% O ₂	D. Limited Emission Rate: 400 ppmv at 3% O ₂	E. Specific Source Test or Monitoring Record Citation: Laboratory Report # 209-057	F. Test Date: May 11,2009

A. Emission Unit Description: 4.9 MMBTU/HR ASPHALT HEATER (12001)			B. Pollutant: NOX
C. Measured Emission Rate: 3.8 ppmv at 3% O ₂	D. Limited Emission Rate: 30 ppmv at 3% O ₂	E. Specific Source Test or Monitoring Record Citation: Laboratory Report # 209-197	F. Test Date: November 13,2009

A. Emission Unit Description: 4.9 MMBTU/HR ASPHALT HEATER (12001)			B. Pollutant: CO
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C. Measured Emission Rate: 193 ppmv at 3% O ₂	D. Limited Emission Rate: 400 ppmv at 3% O ₂	E. Specific Source Test or Monitoring Record Citation: Laboratory Report # 209-197	F. Test Date: November 13,2009
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A. Emission Unit Description: 4.9 MMBTU/HR ASPHALT HEATER (P1)			B. Pollutant: NOX
C. Measured Emission Rate: 12.2 ppmv at 3% O ₂	D. Limited Emission Rate: 30 ppmv at 3% O ₂	E. Specific Source Test or Monitoring Record Citation: Laboratory Report # 209-197	F. Test Date: November 13, 2009

A. Emission Unit Description: 4.9 MMBTU/HR ASPHALT HEATER (P1)			B. Pollutant: CO
C. Measured Emission Rate: 69 ppmv at 3% O ₂	D. Limited Emission Rate: 400 ppmv at 3% O ₂	E. Specific Source Test or Monitoring Record Citation: Laboratory Report # 209-197	F. Test Date: November 13,2009



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Period Covered by Compliance Certification: _01 / _01 / _11(MM/DD/YY) to 12/31/2011 (MM/DD/YY)

<p>A Attachment # or Permit Condition #: 74.15.1N4</p>	<p>D. Frequency of monitoring: Routine Surveillance to ensure</p>
<p>B. Description: RULE 74.15.1 D.1 and 74.15.B.1 or 2 Equipment currently shut down and not operating. Applies to Asphalt Heaters 506 and Shell 1 and 2. Boilers 1 ,4,5,6,and Stand-by Boilers at 3500 tank Farm.</p>	<p>equipment currently shut down and not operating</p>
<p>C. Method of monitoring: . Annual Compliance Certification. None of the equipment listed in the Description were operated in 2010.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
	<p>F. Currently in Compliance? (Y or N): Y</p>
	<p>G. Compliance Status? (C or I):</p>
	<p>H. Excursions, exceedances, or other non-compliance? (Y or N): N</p>
	<p>if yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: ATCM Engine Ni</p>	<p>D. Frequency of monitoring: A monthly log is maintained on hours of operation to comply with the requirements of NEPA 25.</p>
<p>B. Description: Section 93115, Title 17, California Code of Regulations, Airborne Toxic Control Measure for Stationary Compression Ignition (CI) Engines. Standby Diesel Engine for Emergency Fire Pump.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Fuel use is documented through the retention of records for fuel purchased. Information on this Standby Diesel Engine due to the District by July 1,2005 has been provided.</p>	<p>F. Currently in Compliance? (Y or N): _Y_</p>
	<p>G. Compliance Status? (C or I): C</p>
	<p>H. *Excursions, exceedances, or other non-compliance? (Y or N): N</p>
	<p>if yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: ATCM Engine N2</p>	<p>D. Frequency of monitoring: The records are compiled into a monthly total and summed for the previous 12 months.</p>
<p>B. Description: Section 93115, Title 17, California Code of Regulations, Airborne Toxic Control Measure for Stationary Compression Ignition (CI) Engines. Standby Diesel Engine for Emergency Electric Power.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Engine is equipped with a non-resettable hour meter. A log is maintained that differentiates operation during maintenance and testing from emergency use. Fuel use is documented through the retention of records for fuel purchased. Information on this Standby Diesel Engine due to the District by July 1, 2005 has been provided.</p>	<p>F. Currently in Compliance? (Y or N): Y</p>
	<p>G. Compliance Status? (C or I): C</p>
	<p>H. 'Excursions, exceedances, or other non-compliance? (Y or N): N</p>
	<p>if yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: _01 / _01 / _11(MM/DD/YY) to _12/31/2011 (MM/DD/YY)

<p>A. Attachment # or Permit Condition*: P00012PCI Condition No. I throughputs and consumption.</p> <p>B. Description: Rule 26, "New Source Review" Rule 29, "Conditions on Permit" Throughput and Consumption Limits.</p>	<p>D. Frequency of monitoring: Monthly records are maintained for t</p> <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Annual Compliance Certification.</p>	<p>F. Currently in Compliance? (Y or N): Y</p> <p>G. Compliance Status? (Cori): C</p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): N</p> <p>•If yes, attach Deviation Summary Form</p>

<p>A Attachment # or Permit Condition*: P00012PC1 Condition No. 2</p> <p>B. Description: Rule 26, "New Source Review" Rule 29, "Conditions on Permit" Throughput and Consumption Limits. These Limits are based on the fugitive emissions from 70 Oil Wells.</p>	<p>D. Frequency of monitoring: Annual Compliance Certification.</p> <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Monthly records are maintained for throughputs and consumption. No new Oil Wells were drilled in 2011.</p>	<p>F. Currently in Compliance? (Y or N): Y</p> <p>G. Compliance Status? (Cori): C</p> <p>H. •Excursions, exceedances, or other non-compliance? (Y or N): N</p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #. P00012PC I Condition No. 3 C e r t i f i c a t i o n .</p> <p>B. Description: Rule 29, Solvent Record keeping.</p>	<p>D. Frequency of monitoring: Annual Compliance</p> <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Monthly records are maintained for solvent usage and purchase.</p>	<p>F. Currently in Compliance? (Y or N): <u> </u>Y<u> </u></p> <p>G. Compliance Status? (C or 1): C</p> <p>H. •Excursions, exceedances, or other non-compliance? (Y or N): N</p> <p>if yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 11 (MM/DD/YY) to 12/31/2011 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: P00012PC2</p>	<p>D. Frequency of monitoring: Annual Compliance Certification.</p>
<p>B. Description: Rule 64 Sulfur Content of Fuels. Nitrite solution vessel operation All produced gas and casing gas is processed through the nitrite solution gas sweetening system. The produced or casing gas shall not be burned as fuel in the Boilers, Steam Generators, or process Heaters in excess of 236 ppm or the equivalent of 15 grams per cubic feet.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable AQMD method 307-94 Determination of Sulfur in a Gaseous Matrix</p>
<p>C. Method of monitoring: Weekly test the hydrogen sulfide content of the gases downstream of the nitrite vessels or buffer vessels using detector tube method. Annually analyze the sulfur content of this fuel gas.</p>	<p>F. Currently in Compliance? (Y or N): <u> </u>Y<u> </u> G. Compliance Status? (Cori): C</p>
	<p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u> </u>N<u> </u> if yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: P000 1 2PC3</p>	<p>D. Frequency of monitoring: Annual Compliance Certification. Monitor, Measure and record Operating parameters on a monthly basis.</p>
<p>B. Description: Rule 26 new Source Review Rule 74.15 Boiler, Steam Generators, and Process Heaters. Specific Requirements for the 20 MMBTU/Hr. Erie City Boiler. Nox shall not exceed 36 ppm corrected to 3% oxygen. The flue gas recirculation valve opening shall be set at or above 45% and an excess oxygen rate between 0.5 and 3%.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. CARB Method 1-100</p>
<p>C. Method of monitoring: Biennial Source Testing. Maintain the external flue gas recirculating system and excess oxygen rate. The flue gas recirculation valve was set at or above 30% and the excess oxygen rate was maintained between 0.5 and 3.0%</p>	<p>F. Currently in Compliance? (Y or N): <u> </u>Y<u> </u> G. Compliance Status? (C or I): C</p>
	<p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u> </u>N<u> </u> if yes, attach Deviation Summary Form</p>

<p>A Attachment # or Permit Condition #: P00012PC4</p>	<p>D. Frequency of monitoring: Annual Compliance Certification. Monitor, Measure and record operating parameters on a monthly basis.</p>
<p>B. Description: Rule 26 new Source Review Rule 74.15 Boiler, Steam Generators, and Process Heaters. Specific Requirements for the 20 MMBTU/Hr. Natco crude oil process heater. Nox shall not exceed 34 ppm corrected to 3% oxygen. The flue gas recirculation valve opening shall be set at or above 50% and an excess oxygen rate between 0.5 and 2.5%.</p>	<p>E. Source test reference method, if applicable_ Attach Source Test Summary Form, if applicable. CARB Method 1-100</p>
<p>C. Method of monitoring: Maintain the external flue gas recirculating system and excess oxygen rate. The flue gas recirculation valve was set at or above 50% and the excess oxygen rate was maintained between 0.5 and 2.5%</p>	<p>F. Currently in Compliance? (Y or N): <u> </u>Y<u> </u> G. Compliance Status? (C or I): C</p>
	<p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u> </u>N<u> </u> if yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: _01 / _01_ / 2011_ (MM/DD/YY) to _12/31/2011_ (MM/DD/YY)

A. Emission Unit Description: 20 MMBTU/HR NG STEAM GENERATOR #(5)			B. Pollutant: NOX
C. Measured Emission Rate: 32 ppmv at 3% O ₂	D. Limited Emission Rate: 40 ppmv at 3% O ₂	E. Specific Source Test or Monitoring Record Citation: Laboratory Report # 210-078	F. Test Date: June 22,2010

A. Emission Unit Description: 20 MMBTU/HR NG STEAM GENERATOR #(5)			B. Pollutant: CO
C. Measured Emission Rate: 0.2 ppmv at 3% O ₂	D. Limited Emission Rate: 400 ppmv at 3% O ₂	E. Specific Source Test or Monitoring Record Citation: Laboratory Report # 210-078	F. Test Date: June 22,2010

A. Emission Unit Description: 20 MMBTU/HR NG ERIE CITY BOILER #7			B. Pollutant: NOX
C. Measured Emission Rate: 35.4 ppmv at 3% O ₂	D. Limited Emission Rate: 40 ppmv at 3% O ₂	E. Specific Source Test or Monitoring Record Citation: Laboratory Report # 209-140	F. Test Date: August 7,2009

A. Emission Unit Description: 20 MMBTU/HR NG ERIE CITY BOILER #7			B. Pollutant: CO
C. Measured Emission Rate: 0.4 ppmv at 3% O ₂	D. Limited Emission Rate: 400 ppmv at 3% O ₂	E. Specific Source Test or Monitoring Record Citation: Laboratory Report # 209-140	F. Test Date: August 7,2009

A. Emission Unit Description: 20 MMBTU/HR NG CRUDE OIL PROCESS HEATER (RETORT)			B. Pollutant: NOX
C. Measured Emission Rate: 26.9 ppmv at 3% O ₂	D. Limited Emission Rate: 40 ppmv at 3% O ₂	E. Specific Source Test or Monitoring Record Citation: Laboratory Report # 210-142	F. Test Date: November 19,2010

ANNUAL COMPLIANCE CERTIFICATION

SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: _01_ / _01_ / 2011_ (MM/DD/YY) to _12/31/2011_ (MM/DD/YY)

A. Emission Unit Description: 20 MMBTU/HR NG CRUDE OIL PROCESS HEATER (RETORT)			B. Pollutant: CO
C. Measured Emission Rate: 1 ppmv at 3% O ₂	D. Limited Emission Rate: 400 ppmv at 3% O ₂	E. Specific Source Test or Monitoring Record Citation: Laboratory Report # 209-057	F. Test Date: May 11, 2009

A. Emission Unit Description: 4.9 MMBTU/HR ASPHALT HEATER (12001)			B. Pollutant: NOX
C. Measured Emission Rate: 3.8 ppmv at 3% O ₂	D. Limited Emission Rate: 30 ppmv at 3% O ₂	E. Specific Source Test or Monitoring Record Citation: Laboratory Report # 209-197	F. Test Date: November 13, 2009

A. Emission Unit Description: 4.9 MMBTU/HR ASPHALT HEATER (12001)			B. Pollutant: CO
C. Measured Emission Rate: 193 ppmv at 3% O ₂	D. Limited Emission Rate: 400 ppmv at 3% O ₂	E. Specific Source Test or Monitoring Record Citation: Laboratory Report # 209-197	F. Test Date: November 13, 2009

A. Emission Unit Description: 4.9 MMBTU/HR ASPHALT HEATER (PI)			B. Pollutant: NOX
C. Measured Emission Rate: 12.2 ppmv at 3% O ₂	D. Limited Emission Rate: 30 ppmv at 3% O ₂	E. Specific Source Test or Monitoring Record Citation: Laboratory Report # 209-197	F. Test Date: November 13, 2009

A. Emission Unit Description: 4.9 MMBTU/HR ASPHALT HEATER (PI)			B. Pollutant: CO
C. Measured Emission Rate: 69 ppmv at 3% O ₂	D. Limited Emission Rate: 400 ppmv at 3% O ₂	E. Specific Source Test or Monitoring Record Citation: Laboratory Report # 209-197	F. Test Date: November 13, 2009



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: _01 / _01_ / _11 (MM/DD/YY) to 12/31/2011 (MM/DD/YY)

<p>A Attachment # or Permit Condition #: P00012PC5 Cond.# 1,4,5,6,and7.</p> <p>B. Description: Steam Generators 3,4 and 5. RULE 26 New Source Review. RULE 29 Conditions on Permits. RULE 74.15 Boilers, Steam Generators, and Process Heaters. Burning of fuel oil in Steam Generators 3,4,and5 at a maximum rate of 118.2 gallons per hour during mandatory gas curtailment. Sulfur and Nitrogen concentration limits. Emission limits and FGR settings See Attachment 75.15N1 for additional requirements.</p> <p>C. Method of monitoring: Monitor burning of fuel oil during natural gas curtailment for generators 3,4,and5. Obtain approval prior to burning fuel at a higher rate during curtailment by source testing. Fuel oil burned shall be limited to a sulfur content not to exceed 0.25% by weight and a nitrogen content not to exceed 0.25% by weight. Maintain fuel records. Maintain a dedicated fuel meter on each generator. Maintain FGR settings as follows: No.3 at 45% No.4 at 40% No.5 at 60%. All at excess oxygen rates between 0.5 and 2.5%. Flue gas recirculation valves were maintained as indicated above or as indicated by the latest source test and oxygen settings were maintained between 0.5 and 2.5% No fuel oil was burned in 2010</p>	<p>D. Frequency of monitoring: Annual Compliance Certification.</p> <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. CARB Method 1-100</p> <p>F. Currently in Compliance? (Y or N): Y</p> <p>G. Compliance Status? (C or I): C</p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): N</p> <p>• if yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: P00012PC5 Cond# 2,5,6 and 7.</p> <p>B. Description: RULE 26 new Source Review. RULE 29 Conditions on Permits. RULE 74.15 Steam Generator No. 0. Emission Limits and FGR Settings. See Attachment 74.15N1 for additional requirements. Fuel burned during commercial operation limited to utility natural gas.</p> <p>C. Method of monitoring: Obtain approval prior to burning fuel oil by source testing. Maintain a dedicated totalizing fuel meter. Routine surveillance to maintain FGR settings at 20% or more and excess oxygen rates between 0.5 and 2.5%. Maintain monthly records of FGR and excess oxygen control settings. Biennial source testing while burning natural gas. Monitor and record amount of fuel burned. No fuel oil was burned in 2010. FGR valve opening was maintained at or above 20% and excess oxygen trim controller setting was maintained between 0.5 and 2.5%</p>	<p>D. Frequency of monitoring: Annual Compliance Certification.</p> <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable. CARB Method 1-100</p> <p>F. Currently In Compliance?(Y or N): Y</p> <p>G. Compliance Status? (C or I): C</p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): N</p> <p>If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: P00012PC5 Condition #s 3,5,6and 7.</p> <p>B. Description: RULE 26 New Source Review. RULE 29 Conditions on Permits. RULE 74.15 Boilers, Steam Generators, and Process Heaters. Emission Limits, FGR Settings, and burning of fuel oil in Steam Generators 1 and 2.</p> <p>C. Method of monitoring: Monthly records of FGR and excess oxygen control settings. Records of Emission Source Tests. Source test prior to burning fuel oil during periods of curtailment. Source test (NOx,CO) while burning fuel oil during periods other than curtailment. Biennial source testing while burning natural gas. Amount of fuel consumed. Test Methods NOx — ARB Method 100. CO_ Arb Method 100. No fuel oil was burned in 2010. FGR was maintained at or above 16% on #1 and 55% on #2. Oxygen trim control was maintained between 0.5 and 2.5%.</p>	<p>D. Frequency of monitoring: Annual Compliance Certification.</p> <p>E. Source test reference method, If applicable. Attach Source Test Summary Form, if applicable. CARB Method 1-100</p> <p>F. Currently in Compliance? Y:</p> <p>G. Compliance Status? (C or I): C</p> <p>1-1. *Excursions, exceedances, or other non-compliance? (Y or N): N</p> <p>*Iras, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 01 / 01 / 2011_ (MM/DD/YY) to 12/31/2011 _ (MM/DD/YY)

A. Emission Unit Description: 20 MMBTU/HR NG STEAM GENERATOR #(2)			B. Pollutant: CO
C. Measured Emission Rate: 0.9 ppmv at 3% O ₂	D. Limited Emission Rate: 400 ppmv at 3% O ₂	E. Specific Source Test or Monitoring Record Citation: Laboratory Report # 210-142	F. Test Date: November 19,2010

A. Emission Unit Description: 20 MMBTU/HR NG STEAM GENERATOR #(3) Unit was not operated in 2010			B. Pollutant: NOX
C. Measured Emission Rate: 27 ppmv at 3% O ₂	D. Limited Emission Rate: 40 ppmv at 3% O ₂	E. Specific Source Test or Monitoring Record Citation: Laboratory Report # 296-077	F. Test Date: June 17,1996

A. Emission Unit Description: 20 MMBTU/HR NG STEAM GENERATOR #(3) Unit was not operated in 2010			B. Pollutant: CO
C. Measured Emission Rate: < 2 ppmv at 3% O ₂	D. Limited Emission Rate: 400 ppmv at 3% O ₂	E. Specific Source Test or Monitoring Record Citation: Laboratory Report # 296-077	F. Test Date: June 17,1996

A. Emission Unit Description: 20 MMBTU/HR NG STEAM GENERATOR #(4)			B. Pollutant: NOX
C. Measured Emission Rate: 28.8 ppmv at 3% O ₂	D. Limited Emission Rate: 40 ppmv at 3% O ₂	E. Specific Source Test or Monitoring Record Citation: Laboratory Report # 210-033	F. Test Date: March 26,2010

A. Emission Unit Description: 20 MMBTU/HR NG STEAM GENERATOR #(4)			B. Pollutant: CO
C. Measured Emission Rate: 1.3 ppmv at 3% O ₂	D. Limited Emission Rate: 400 ppmv at 3% O ₂	E. Specific Source Test or Monitoring Record Citation: Laboratory Report # 210-033	F. Test Date: March 26,2010



ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 01 / 01_ / 2011_ (MM/DD/YY) to 12/31/2011 _ (MM/DD/YY)

A. Emission Unit Description: 20 MMBTU/HR NG STEAM GENERATOR #(0)			B. Pollutant: NOX
C. Measured Emission Rate: 32 ppmv at 3% O ₂	D. Limited Emission Rate: 40 ppmv at 3% O ₂	E. Specific Source Test or Monitoring Record Citation: Laboratory Report # 210-078	F. Test Date: June 22,2010

A. Emission Unit Description: 20 MMBTU/HR NG STEAM GENERATOR #(0)			B. Pollutant: CO
C. Measured Emission Rate: 0.2 ppmv at 3% O ₂	D. Limited Emission Rate: 400 ppmv at 3% O ₂	E. Specific Source Test or Monitoring Record Citation: Laboratory Report # 210-078	F. Test Date: June 22,2010

A. Emission Unit Description: 20 MMBTU/HR NG STEAM GENERATOR #(1)			B. Pollutant: NOX
C. Measured Emission Rate: 35.4 ppmv at 3% O ₂	D. Limited Emission Rate: 40 ppmv at 3% O ₂	E. Specific Source Test or Monitoring Record Citation: Laboratory Report # 209-140	F. Test Date: August 7,2009

A. Emission Unit Description: 20 MMBTU/HR NG STEAM GENERATOR #(1)			B. Pollutant CO
C. Measured Emission Rate: 0.4 ppmv at 3% O ₂	D. Limited Emission Rate: 400 ppmv at 3% O ₂	E. Specific Source Test or Monitoring Record Citation: Laboratory Report # 209-140	F. Test Date: August 7,2009

A. Emission Unit Description: 20 MMBTU/HR NG STEAM GENERATOR #(2)			B. Pollutant: NOX
C. Measured Emission Rate: 26.9 ppmv at 3% O ₂	D. Limited Emission Rate: 40 ppmv at 3% O ₂	E. Specific Source Test or Monitoring Record Citation: Laboratory Report # 210-142	F. Test Date: November 19,2010



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01/1/11 (MM/DD/YY) to 12/31/2011 (MM/DD/YY)

A Attachment # or Permit Condition #: P00012PC6 B. Description: p r o p e r t y . RULE 51 Nuisance Asphalt Loading Racks Odor Control.	D. Frequency of monitoring: Routine surveillance to ensure the vapor collection and scrubbing system is operating
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Routine surveillance to ensure the vapor collection and scrubbing system is operating properly.	F. Currently in Compliance? (Y or N): Y
	G. Compliance Status? (Cori): C
	H. *Excursions, exceedances, or other non-compliance? (Y or N): N if yes, attach Deviation Summary Form

A Attachment # or Permit Condition #: P00012PC7 B. Description: RULE 26 and 71.0 Crude Oil and Gas Oil loading Rack vapor Control. Applies to crude oil loading racks at C-1, C-2, C-3, 2005, and 2006 area, and gas oil loading racks at 1501-1503 area.	D. Frequency of monitoring: Routine surveillance to ensure that the vapor collection and scrubbing system is operating properly
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Annual Compliance Certification including monitoring one complete loading operation for leaks and proper operation of the loading equipment and delivery vessel vapor recovery and overflow protection systems. Maintain records of annual inspections of the loading operations. Racks were inspected using a Bacharach TLV Analyzer and we are in compliance with this rule.	F. Currently in Compliance? (Y or N): Y
	G. Compliance Status? (C or I): C
	H. *Excursions, exceedances, or other non-compliance? (Y or N): N If yes, attach Deviation Summary Form

A Attachment # or Permit Condition #: P00012PC8 8. Description: RULE 29 Out of Service Emission Units.	D. Frequency of monitoring: Annual
	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable
C. Method of monitoring: Annual Compliance Certification to ensure that emissions unit is shut down and not being operated.	F. Currently in Compliance? (Y or N): Y
	G. Compliance Status? (C or I): C
	1-1, *Excursions, exceedances, or other non-compliance? (Y or N): N "If yes, attach Deviation Summary Form



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: _01 / _01_ / _11 (MM/DD/YY) to _12/31/2011 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 50</p>	<p>D. Frequency of monitoring: Routine Surveillance and visual inspections.</p>
<p>B. Description: RULE 50 Opacity. Applies to all emission units at this source.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Annual Compliance Certification including a survey of all emission units. Opacity Readings upon request.</p>	<p>F. Currently in Compliance? (Y or N): Y</p> <p>G. Compliance Status? (C or I): C</p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): N</p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #54.B.1 applies to all units that emit sulfur Compounds.</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: RULE 54.B.1 Sulfur Compounds. RULE 64 Sulfur content of fuels. Shall not discharge sulfur compounds in excess of 300 ppm from any combustion operation or 500 ppm from any other operation.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Maintain a representative fuel analysis or exhaust analysis. This analysis provided to District upon request. Upon district request, source test for sulfur compounds at point of discharge. Annual Compliance Certification</p>	<p>F. Currently in Compliance? (Y or N): Y G</p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): N</p> <p>if yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #.54.B.2</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: RULE 54.3.2 Sulfur Compounds. Sulfur dioxide Concentration at ground or Sea Level at or beyond the property line.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Annual Compliance Certification Maintain a representative fuel analysis or exhaust analysis, Along with modeling data. Determine ground or sea level concentrations upon request.</p>	<p>F. Currently in Compliance? (Y or N): Y</p> <p>G. Compliance Status? (Corl):C</p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): _N_</p> <p>*If yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 11 (MM/DD/YY) to 12/31/2011 (MM/DD/YY)

<p>A Attachment # or Permit Condition #: 57.1</p> <p>B. Description: RULE 57.1 Combustion Contaminates. Applies to all combustion emission units at this facility.</p>	<p>D. Frequency of monitoring: Routine surveillance to assure that equipment is fired on natural gas only. Annual Compliance Certification</p> <p>E. Source test reference method, If applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Reference the District Analysis for Rule 57.1 Compliance based on EPA Emission Factors is sufficient.</p>	<p>F. Currently in Compliance? (Y or N): Y</p> <p>G. Compliance Status? (Cori): C</p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): N</p> <p style="text-align: center;">if yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: 64_13.1</p> <p>B. Description: RULE 64.B.1 Sulfur Content of Fuels — Gaseous Fuel Requirements.</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p> <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Analyze the sulfur content of fuel other than PUC quality natural gas using AQMD Method 307-94. (Submit with annual compliance certification)</p>	<p>F. Currently in Compliance? (Y or N): Y</p> <p>G. Compliance Status? (Cori): C</p> <p>H. •Excursions, exceedances, or other non-compliance? (Y or N): N</p> <p style="text-align: center;">*If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: 64.B.2</p> <p>B. Description: RULE 64.B.2 Sulfur Content of Fuels — Solid or Liquid Fuel Requirements. Applies to all combustion units at this stationary source while burning solid or liquid fuel.</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p> <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Obtain fuel suppliers certification or test the sulfur content using ASTM Method D4294-83 or D2622-87 No Solid or Liquid Fuel was burned in 2011</p>	<p>F. Currently in Compliance? (Y or N): Y</p> <p>G. Compliance Status? (Cori): C</p> <p>I-I. *Excursions, exceedances, or other non-compliance? (Y or N): N</p> <p style="text-align: center;">if yes, attach Deviation Summary Form</p>



Environmental and Analytical Services-Since 1994
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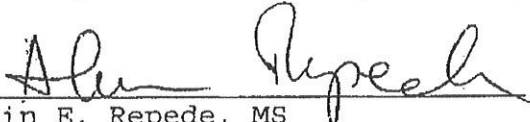
Prepared for: Tenby, Inc.
P.O. Box 254
Oxnard, CA
Attn: Dick

Report Date: February 17, 2011
Laboratory Number: 110468
Project Name: N/A
Sampled by: Client

On February 16, 2011, Capco Analytical Services, Inc. (CAS), received two(2) samples to be analyzed. The samples were identified and assigned the laboratory ID numbers listed below:

<u>SAMPLE DESCRIPTION</u>	<u>CAS LAB NUMBER ID</u>
C-1	110468-01
T-1	110468-02

By my signature below, I certify that the results contained in this laboratory report comply with applicable standards for certification by the California Department of Public Health's Environmental Laboratories Accreditation Program (ELAP), both technically and for completeness, and that, based on my inquiry of the person or persons directly responsible for performing the analyses, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.


Alin E. Repede, MS
Director - Analytical Operations

If you have any further questions or concerns, please contact me at your convenience.

This report consists of 2 pages excluding the cover letter and the Chain of Custody.

This report shall not be reproduced except in full without the written approval of CAS. The test results reported represent only the item being tested and may not represent the entire material from which the sample was taken.

Client:	TENBY INC.	Date Sampled:	02/16/11
CAS lab NO. :	110468-02	Date Received:	02/16/11
Sample ID:	T-1	Date Analyzed:	02/16/11
Sample Matrix:	Gas	Analyst:	PF

**Total Reduced Sulfur
ASTM METHOD D6228**

Constituents	Results ppm (v/v)	DF	MDL ppm (v/v)
Hydrogen Sulfide	ND	1	0.50
Carbonyl Sulfide	1.83	1	0.50
Methyl Mercaptan	34.60	5	2.50
Ethyl Mercaptan	17.40	2	1.00
Carbon Disulfide	0.00	1	0.50
Dimethyl Sulfide	2.8	1	0.50
Total Reduced Sulfur (Estimate)	57.57		0.50

DF: DILUTION FACTOR
MDL: METHOD DETECTION LIMIT
ND: NOT DETECTED

Client:	TENBY INC.	Date Sampled:	02/16/11
CAS lab NO. :	110468-01	Date Received:	02/16/11
Sample ID:	C-1	Date Analyzed:	02/16/11
Sample Matrix:	Gas	Analyst:	PF

Total Reduced Sulfur
ASTM METHOD D6228

Constituents	Results ppm (v/v)	DF	MDL ppm (v/v)
Hydrogen Sulfide	36.30	5	2.50
Carbonyl Sulfide	1.06	1	0.50
Methyl Mercaptan	17.60	2	1.00
Ethyl Mercaptan	19.14	2	1.00
Carbon Disulfide	0.00	1	0.50
Dimethyl Sulfide	5.3	1	0.50
Total Reduced Sulfur (Estimate)	82.30		2.50

DF: DILUTION FACTOR
MDL: METHOD DETECTION LIMIT
ND: NOT DETECTED

CAPCO ANALYTICAL SERVICES

1536 Eastman Avenue, Suite B
 Ventura, CA 93003
 (805) 644-1095 Fax 644-9947
 www.capcoenv.com

CHAIN OF CUSTODY RECORD

PROJ. NO. _____ PROJECT NAME _____

SAMPLERS: (Signature) _____

CONTAINER TYPES
 A = AMBER B = BRASS G = GLASS
 P = PLASTIC V = VOA VIAL O = OTHER

SAMPLE NO.	DATE SAMPLED	TIME SAMPLED	Q/C	Q/B	SAMPLE IDENTIFICATION	MATRIX			CONTAINER #	CONTAINER TYPE	REMARKS
						WATER	SOIL	SUDGE/OTHER			
1	2/10/11	9am			C-1						
2	2/11/11	9am			F-1						

ANALYSIS
 Total Sulfur
 1110468

REPORT
 Company _____
 Address _____
 Phone 427-0069 Contact Dick
 Email _____

BILL TO:
 Company Tenby Inc
 Address A.O. Box 258
 Phone 910-8799 Contact John
 P.O.# _____

The undersigned hereby acknowledges having received a copy of the Fee Schedule/General Information and Conditions, the provisions of which are a part of this agreement.

Relinquished by: (Signature) _____ Date/Time 2-10-11 12:55p
 Received by: (Signature) _____

Relinquished by: (Signature) _____ Date/Time _____
 Received by: (Signature) _____

CHECK ONE BOX:
 DISPOSE SAMPLES
 RETURN SAMPLES

TURN AROUND TIME
 STANDARD OTHER _____
 24 HOURS
 48 HOURS
 72 HOURS



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 11 (lt/IM/DD/YY) to 12/31/2011 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 71.4.B.1</p>	<p>D. Frequency of monitoring: Annual Compliance Certification.</p>
<p>B. Description: RULE 71.4.B.1 First Stage Sump Prohibition..</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 first stage sumps at this facility.</p>	<p>F. Currently in Compliance? (Y or N): Y</p> <p>G. Compliance Status? (C or I): C</p> <p>H. 'Excursions, exceedances, or other non-compliance? (Y or N): N</p> <p>If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 71.4.B.3</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: RULE 71.4.B.3 Well Cellar Storage Prohibition. Applies to any well cellar at this stationary source. Prohibits the storage of crude oil or petroleum material in a well cellar.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Routine surveillance and visual inspection of all well cellars to assure compliance. Maintain records of crude oil storage during well workovers or equipment maintenance. Submit records to District upon request. We don't store crude oil in well cellars except during workovers or maintenance activities.</p>	<p>F. currently in Compliance?(Y or N): Y</p> <p>G. Compliance Status? (Coil): C</p> <p>H. 'Excursions, exceedances, or other non-compliance? (Y or N): N</p> <p>if yes, attach Deviation Summary Form</p>

<p>A Attachment # or Permit Condition #: 74.6</p>	<p>D. Frequency of monitoring: Annual Compliance Certification.</p>
<p>B. Description: RULE 74.6 Surface Cleaning and Degreasing. Applies to all solvent cleaning activities at this stationary source.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Maintain records of current solvent information. Routine surveillance of the applicable solvent cleaning activities. Maintain records of ROC content of solvents used. We are in compliance with Rule 74.6.</p>	<p>F. Currently in Compliance? (Y or N): Y</p> <p>G. Compliance Status? (Cori): C</p> <p>H. "Excursions, exceedances, or other non-compliance? (Y or N): N</p> <p>if yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 01 / 01 / 11 (MM/DD/YY) to 12/31/2011 (MM/DD/YY)

<p>A. Attachment # or Permit Condition # 74.10</p>	<p>D. Frequency of monitoring: Routine surveillance of applicable components to assure</p>
<p>B. Description: RULE 74.10 Applicable Requirements Components at Crude Oil Production and Processing Facilities.</p>	<p>compliance with Rule 74.10 Weekly and Quarterly inspections as required by Rule 74.10</p>
<p>C. Method of monitoring: Inspect gaseous leaks using EPA Method 21. Maintain records of inspections and leak detection.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>F. Currently in Compliance? (Y or N): <u>Y</u></p>	<p>G. Compliance Status? (Cori): <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 #: 74.22</p>	<p>D. Frequency of monitoring: Annual Compliance Certification.</p>
<p>B. Description: RULE 74.22 Natural Gas Fired Fan-Type Central Furnaces.</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 Natural Gas Fired Fan-Type Central Furnaces at this Stationary Source that are applicable to Rule 74.22</p>	<p>F. Currently in Compliance?(Y or N): <u>Y</u></p>
<p>G. Compliance Status? (Cori): <u>c</u></p>	<p>1-1.*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 #: 74.1</p>	<p>D. Frequency of monitoring: Annual Compliance Certification.</p>
<p>B. Description: RULE 74.1 Abrasive Blasting.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Annual Compliance Certification. Routine Surveillance and Visual inspections of abrasive blasting operations to assure compliance. Maintain abrasive blasting records. (No abrasive blasting was done in 2010).</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p>
<p>G. Compliance Status? <u>u</u> (Cori): <u>C</u></p>	<p>I-I.*Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *if yes, attach Deviation Summary Form</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: _01 / _01 / _11 (MM/DD/YY) to _12/31/2011 (MM/DD/YY)

<p>A. Attachment # or Permit Condition*: 74.2</p>	<p>D. Frequency of monitoring: Annual Compliance Certification.</p>
<p>B. Description: RULE 74.2 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 the architectural coating operations to assure compliance. Maintain records of VOC content of coatings used.</p>	<p>F. Currently in Compliance? (Y or N): Y</p>
	<p>G. Compliance Status? (C or I): C</p>
	<p>H. *Excursions, exceedances, or other non-compliance? ("Y or N): N</p>
	<p>If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition # 74.4.D</p>	<p>D. Frequency of monitoring: Annual Compliance Certification.</p>
<p>B. Description: RULE 74.4.D Cut Back Asphalt — Road Oils.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Test ROC content of oil sample being prepared for usage. Maintain records of oil analysis. (No cutback asphalt or road oils were used at this facility for 2010)</p>	<p>F. Currently in Compliance?</p>
	<p>G. Compliance Status? (C or C</p>
	<p>H. *Excursions, exceedances, or other non-compliance? (Y or N): N</p>
	<p>If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #:</p>	<p>D. Frequency of monitoring:</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): Y</p>
	<p>G. Compliance Status? (C ori):C</p>
	<p>H. *Excursions, exceedances, or other non-compliance? (Y or N): N</p>
	<p>If yes, attach Deviation Summary Form</p>