



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

February 12, 2015

Mr. Dan Searcy
Compliance Division, Manager
Ventura County APCD
669 County Square Drive
Ventura, California 93003

Subject: 2014 Annual Title V Compliance Certification and Semi Annual Deviation Report

Mr. Searcy:

Enclosed is The Procter & Gamble Paper Products Company's Oxnard facility, Part 70 Permit No. 00015 Compliance Certification for the January 1, 2014 through December 31, 2014 reporting period. This submission also constitutes the Semi Annual Deviation Report for the time period July 1, 2014 – Dec 31, 2014.

I can be reached at 805-485-8871, x8966 or aguilar.m@pg.com should you have any questions about our facilities certification.

Respectfully,

Mr. Mario Aguilar
HS&E Leader

Cc: Mr. Gerardo Rios, Permits, Chief, US EPA Region IX
Ms. Kara Roeder, Plant Manager, P&G
Ms. Kathleen Green, Environmental Systems Leader, P&G

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A.P.C.D.

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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 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: <i>Kara Poeder</i> Title: <i>P+G Oxnard Plant Manager</i>	Date: <i>2/12/15</i>
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Time Period Covered by Compliance Certification <i>01 / 01 / 14</i> (MM/DD/YY) to <i>12 / 31 / 14</i> (MM/DD/YY)

2014 Reporting Year

Annual Title V Compliance Certification

For

The Procter & Gamble Paper Products Company
Oxnard, CA Facility

VCAPCD Permit No. 00015

Contact:

Mario Aguilar
HS&E Leader
805-485-8871
aguilar.m@pg.com

Permit Section: 1

T.O.C
Permit Revisions Table
Permit Summary and Statement of Basis

This section contains a descriptive summary and statement of basis. Compliance Certification is not applicable to this summary information

Permit Section: 2

Permitted Equipment and Applicable Requirements Table

This is a summary of requirements. Specific and enforceable permit terms and conditions are found in other sections of the permit. Compliance Certification is not applicable to this summary information.

Permit Section: 3

Permitted Throughput and Consumption Limit Table



Ventura County Air
Pollution Control
District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2014 - April 16, 2014

A. Attachment # or Permit Condition #: Section 3 – Permitted Throughput Limits Table 3 (00015-411,431,441)	D. Frequency of monitoring: Monthly
B. Description: Stationary Combustion Engines List of Throughput Permit Limits for Emissions Units	E. Source test reference method N/A
C. Method of monitoring: 12 month rolling totals, based on monthly data for regulated emissions including ROC's are tracked on a monthly basis.	F. Currently in Compliance? YES
	G. Compliance Status: CONTINUOUS
	H. *Excursions, Exceedence, or other non-compliance: NO



Ventura County Air
Pollution Control
District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: April 17, 2014 - December 31, 2014

A. Attachment # or Permit Condition #: Section 3 – Permitted Throughput Limits Table 3 (00015-411,431,441)	D. Frequency of monitoring: Monthly
B. Description: Stationary Combustion Engines List of Throughput Permit Limits for Emissions Units	E. Source test reference method N/A
C. Method of monitoring: 12 month rolling totals, based on monthly data for regulated emissions including ROC's are tracked on a monthly basis.	F. Currently in Compliance? YES
	G. Compliance Status: CONTINUOUS
	H. *Excursions, Exceedence, or other non-compliance: NO

Permit Section: 4

Permitted Emissions Table

This is a summary of requirements. Specific and enforceable permit terms and conditions are found in other sections of the permit. Compliance Certification is not applicable to this summary information.

Permit Section: 5

Exempt Equipment List (Insignificant Activities Table)

This is a summary of insignificant activities listed in the permit for informational purposes. Compliance Certification is not applicable to this section.

Permit Section: 6

Specific Applicable Requirements (Attachments)



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1 - April 16, 2014

A. Attachment # or Permit Condition #: Section 6 – Attachment 74.6 (11/11/03)	D. Frequency of monitoring:
B. Description: Surface Cleaning and Degreasing See Section 8 Rule 74.6	E. Source test reference method
C. Method of monitoring: See Section 8 Rule 74.6	F. Currently in Compliance?
	G. Compliance Status:
	H. *Excursions, Exceedence, or other non-compliance:



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: April 17 - December 31, 2014

<p>A. Attachment # or Permit Condition #: Section 6 – Attachment 74.6 (11/11/03)</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description: Surface Cleaning and Degreasing See Section 8 Rule 74.6</p>	<p>E. Source test reference method</p>
<p>C. Method of monitoring: See Section 8 Rule 74.6</p>	<p>F. Currently in Compliance?</p> <p>G. Compliance Status:</p> <p>H. *Excursions, Exceedence, or other non-compliance:</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1 - April 16, 2014

<p>A. Attachment # or Permit Condition #: Section 6 – Attachment 74.9N7 (11/08/05)</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Stationary Combustion Engines</p> <p>Condition 1 - Emergency or Maintenance Engine Operation <50 hrs/calendar yr</p> <p>Condition 2- Emergency Engines equipped with operating, non resettable, elapsed hour meters.</p> <p>Condition 3 - Records for each emergency engine should include: Engine manufacturer, model number, operator identification number and location.</p> <p>Condition 4 - Report annual hours of maintenance operation to the District annually by Feb 15.</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1 – Fire/Emergency and Maintenance hr runtimes tracked in monthly log</p> <p>Condition 2 – All engines are equipped with a non-resettable hour meter</p> <p>Condition 3 & 4 - Emergency Diesel Engine Annual Report forms are submitted to the District</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status:</p> <p>CONTINUOUS</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: April 17 - December 31, 2014

<p>A. Attachment # or Permit Condition #: Section 6 – Attachment 74.9N7 (11/08/05)</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Stationary Combustion Engines</p> <p>Condition 1 - Emergency or Maintenance Engine Operation <50 hrs/calendar yr</p> <p>Condition 2- Emergency Engines equipped with operating, non resettable, elapsed hour meters.</p> <p>Condition 3 - Records for each emergency engine should include: Engine manufacturer, model number, operator identification number and location.</p> <p>Condition 4 - Report annual hours of maintenance operation to the District annually by Feb 15.</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1 – Fire/Emergency and Maintenance hr runtimes tracked in monthly log</p> <p>Condition 2 – All engines are equipped with a non-resettable hour meter</p> <p>Condition 3 & 4 - Emergency Diesel Engine Annual Report forms are submitted to the District</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status:</p> <p>CONTINUOUS</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1 - April 16, 2014

<p>A. Attachment # or Permit Condition #: Section 6 - 74.15 N.1</p>	<p>D. Frequency of monitoring: Biennial</p>
<p>B. Description: Boilers, Heater Treaters, Steam Generators, and Process Heaters</p> <p>Condition 1 – Emissions: NOx < 40 ppmvd, CO < 400 ppmvd</p> <p>Condition 2 – Source Tested every 24 months using ARB Method 100</p> <p>Condition 3.a-b: Alternate Fuel Use limitations</p> <p>Condition 4 – Startup emissions exemption</p> <p>Condition 5 – Recordkeeping: Alternate Fuels, Biennial Source test report</p> <p>Condition 6 – Flue Gas Recirculation requirements per Section 7</p>	<p>E. Source test reference method: Source Test Summary Form 1 of 4</p> <p><u>ARB Method 100:</u> NOx CO Stack Gas O2</p>
<p>C. Method of monitoring: Condition 1 & 2 -3/13/2014 Source Test demonstrated compliance</p> <p>Condition 3 – Only Natural Gas was used for the 2014 calendar year.</p> <p>Condition 4 – Instructional Condition; Certification not applicable.</p> <p>Condition 5 – No alternate fuel utilized. Source Test report furnished to District on time.</p> <p>Condition 6 – Compliance with applicable Section 7 flue gas recirculation requirements.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: April 17 - December 31, 2014

<p>A. Attachment # or Permit Condition #: Section 6 - 74.15 N.1</p>	<p>D. Frequency of monitoring: Biennial</p>
<p>B. Description: Boilers, Heater Treaters, Steam Generators, and Process Heaters</p> <p>Condition 1 – Emissions: NO_x < 40 ppmvd, CO < 400 ppmvd</p> <p>Condition 2 – Source Tested every 24 months using ARB Method 100</p> <p>Condition 3.a-b: Alternate Fuel Use limitations</p> <p>Condition 4 – Startup emissions exemption</p> <p>Condition 5 – Recordkeeping: Alternate Fuels, Biennial Source test report</p> <p>Condition 6 – Flue Gas Recirculation requirements per Section 7</p>	<p>E. Source test reference method: Source Test Summary Form 1 of 4</p> <p><u>ARB Method 100:</u> NO_x CO Stack Gas O₂</p>
<p>C. Method of monitoring: Condition 1 & 2 -3/13/2014 Source Test demonstrated compliance</p> <p>Condition 3 – Only Natural Gas was used for the 2014 calendar year.</p> <p>Condition 4 – Instructional Condition; Certification not applicable.</p> <p>Condition 5 – No alternate fuel utilized. Source Test report furnished to District on time.</p> <p>Condition 6 – Compliance with applicable Section 7 flue gas recirculation requirements.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p>



Period Covered by Compliance Certification: January 1 - April 16, 2014

<p>A. Attachment # or Permit Condition #: Section 6 – Attachment 74.19N1(11/11/03)</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Graphic Arts Operations Without an Emissions Capture and Control System</p> <p>Condition 1: Only use flexographic inks < 225 g/l Condition 2: Fountain Solutions meets specified limits Condition 3: Cleaning using approved ROC content and composite partial pressure Solvents Condition 4: Usage of Methylene Chloride Prohibited Condition 5.a-d: Any solvent cleaning operations must use only approved cleaning methods Condition 6: Closed Container Storage of Materials with ROC content Condition 7: Proper disposal of ROC Material Waste Condition 8.a-c: Maintain records (monthly) for inks and fountain solution usage Condition 9.a-e: Test Method utilization</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1 – Chemical Approval Process verifies only <225 g/l ROC content inks used Condition 2 & 3 – Facility does not use Fountain Solution in Graphic Arts operations, Solvent free, water based cleaning solution is used. Condition 4&5 – Per written procedures, facility utilizes solvent-free cleaning solutions (water) Condition 6 – Visual observation of ROC containing materials in closed containers while in storage. Condition 7 – Facility resources are trained to dispose waste per CA Title 22, and Federal RCRA waste management requirements Condition 8 – Electronic and hardcopy records maintained for ink usage Condition 9 – Test conducted utilizing specified methods upon District request</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



Period Covered by Compliance Certification: April 17 - December 31, 2014

<p>A. Attachment # or Permit Condition #: Section 6 – Attachment 74.19N1-(6/14/11)</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Graphic Arts Operations Without an Emissions Capture and Control System</p> <p>Condition 1: Only use flexographic inks < 225 g/l Condition 2: Fountain Solutions meets specified limits Condition 3: Cleaning using approved ROC content and composite partial pressure Solvents Condition 4: Usage of Methylene Chloride Prohibited Condition 5.a-d: Any solvent cleaning operations must use only approved cleaning methods Condition 6: Closed Container Storage of Materials with ROC content Condition 7: Proper disposal of ROC Material Waste Condition 8.a-c: Maintain records (monthly) for inks and fountain solution usage Condition 9.a-e: Test Method utilization</p>	<p>E. Source test reference method N/A</p>
<p>C. Method of monitoring: Condition 1 – Chemical Approval Process verifies only <225 g/l ROC content inks used Condition 2 & 3 – Facility does not use Fountain Solution in Graphic Arts operations, Solvent free, water based cleaning solution is used. Condition 4&5 – Per written procedures, facility utilizes solvent-free cleaning solutions (water) Condition 6 – Visual observation of ROC containing materials in closed containers while in storage. Condition 7 – Facility resources are trained to dispose waste per CA Title 22, and Federal RCRA waste management requirements Condition 8 – Electronic and hardcopy records maintained for ink usage Condition 9 – Test conducted utilizing specified methods upon District request</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1 - April 16, 2014

<p>A. Attachment # or Permit Condition #: Section 6 – Attachment 103N5 (02/09/99)</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Boiler Capacity Factor</p> <p>Condition 1 – Operate at less than 30% Capacity Factor (CF) for CEMs exemption</p> <p>Condition 2 – Install CEMs upon request of District</p> <p>Condition 3 – Maintain monthly fuel consumption records and submit annual capacity factor calculation to demonstrate unit maintains < 30% CF each year.</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1 – Operate at less than 30% Capacity Factor for CEMs exemption</p> <p>Condition 2 – Install CEMs upon request of District</p> <p>Condition 3 – Monthly fuel records and annual capacity factor calculation</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: April 17 - December 31, 2014

<p>A. Attachment # or Permit Condition #: Section 6 – Attachment 103N5 (02/09/99)</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Boiler Capacity Factor</p> <p>Condition 1 – Operate at less than 30% Capacity Factor (CF) for CEMs exemption</p> <p>Condition 2 – Install CEMs upon request of District</p> <p>Condition 3 – Maintain monthly fuel consumption records and submit annual capacity factor calculation to demonstrate unit maintains < 30% CF each year.</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1 – Operate at less than 30% Capacity Factor for CEMs exemption</p> <p>Condition 2 – Install CEMs upon request of District</p> <p>Condition 3 – Monthly fuel records and annual capacity factor calculation</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1 - April 16, 2014

<p>A. Attachment # or Permit Condition #: Section 6 – Attachment STRMLN15LM6000-NOx-rev291</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: LM6000 Gas Turbine Based Cogeneration Unit</p> <p>Condition 1, 2, 4, & 6 NOx < 2.5 ppmvd avg. @ 15% O2 over 3 hr. period, Annual Source Test, and CEMs, ROC <2.0 ppmvd @ 15% O2 average over 3 consecutive hrs. Operate Oxidation Catalyst & test annually, Outlet Ammonia < 20 ppmvd verified annually via source test, PM < 3.08 lbs/MMscf & source test using ARB Method 5 upon District request</p> <p>Condition 3: Emissions Exemption: 12 hr cold startup, 3 hr normal-startup, 2 hr unplanned load changes, and 1 hr shutdown</p> <p>Condition 5.a-f: Source Test Annually at normal operating load. Test Notification and protocol submitted 15 days in advance with report submitted within 45 days of test to include permit specified parameters</p> <p>Condition 7.a-l & 8.a-c : Operate and maintain CEMs & record permit specified data, CEMs calibration and maintenance per 40 CFR, part 51, Appendix P, Sections 3.0 through 3.9.5</p> <p>Condition 9: Written Notification of monitored emission standards violations within 96 hours</p> <p>Condition 10.a-d & 11: Permanent CEMs records, to include permit specified data, Upon request submit CEMs data to District</p> <p>Condition 12 & 13: CEMs data reduced per 40 CFR, part 51, appendix P, paragraphs 5.0 – 5.3.3. Records maintained per permit conditions</p> <p>Condition 14.a-b: Turbine Operating hours report & annual source test report</p>	<p>E. Source test reference method</p> <p>Source Test Summary Form 2 of 4</p> <p>EPA Method 20 -NOx ARB Method 100 -CO, O2 EPA Method 18 -ROC ASTM Method D 3588-91 -Fuel HV BAAQMD Method ST-1B-NH3</p>
<p>C. Method of monitoring:</p> <p>Condition 1, 2, 4, 5, & 6 – Annual source test conducted on March 10, 2014</p> <p>Condition 2, 7, 10, 11, 13 – Recordkeeping</p> <p>Condition 3 – Exemptions applied as encountered during calendar year</p> <p>Condition 5 – Utilize certified Source Test vendors, use specified test methods, and submit documentation per deadline requirements</p> <p>Condition 8 - Maintenance via operators with assistance from CEM manufacturer</p> <p>Condition 9 – Operational procedures ensure compliance with 96 hour reporting requirement</p> <p>Condition 12 – Data Acquisition System data reduction and recordkeeping per specification</p> <p>Condition 14 – Turbine report submitted semi-annually, source test submitted annually</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



Period Covered by Compliance Certification: April 17 - December 31, 2014

<p>A. Attachment # or Permit Condition #: Section 6 – Attachment STRMLN15LM6000-NOx-rev291</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: LM6000 Gas Turbine Based Cogeneration Unit</p> <p>Condition 1, 2, 4, & 6 NOx < 2.5 ppmvd avg. @ 15% O2 over 3 hr. period, Annual Source Test, and CEMs, ROC <2.0 ppmvd @ 15% O2 average over 3 consecutive hrs. Operate Oxidation Catalyst & test annually, Outlet Ammonia < 20 ppmvd verified annually via source test, PM < 3.08 lbs/MMscf & source test using ARB Method 5 upon District request</p> <p>Condition 3: Emissions Exemption: 12 hr cold startup, 3 hr normal-startup, 2 hr unplanned load changes, and 1 hr shutdown</p> <p>Condition 5.a-f: Source Test Annually at normal operating load. Test Notification and protocol submitted 15 days in advance with report submitted within 45 days of test to include permit specified parameters</p> <p>Condition 7.a-l & 8.a-c : Operate and maintain CEMs & record permit specified data, CEMs calibration and maintenance per 40 CFR, part 51, Appendix P, Sections 3.0 through 3.9.5</p> <p>Condition 9: Written Notification of monitored emission standards violations within 96 hours</p> <p>Condition 10.a-d & 11: Permanent CEMs records, to include permit specified data, Upon request submit CEMs data to District</p> <p>Condition 12 & 13: CEMs data reduced per 40 CFR, part 51, appendix P, paragraphs 5.0 – 5.3.3. Records maintained per permit conditions</p> <p>Condition 14.a-b: Turbine Operating hours report & annual source test report</p>	<p>E. Source test reference method</p> <p>Source Test Summary Form 2 of 4</p> <p>EPA Method 20 -NOx ARB Method 100 -CO, O2 EPA Method 18 -ROC ASTM Method D 3588-91 -Fuel HV BAAQMD Method ST-1B-NH3</p>
<p>C. Method of monitoring:</p> <p>Condition 1, 2, 4, 5, & 6 – Annual source test conducted on March 10, 2014</p> <p>Condition 2, 7, 10, 11, 13 – Recordkeeping</p> <p>Condition 3 – Exemptions applied as encountered during calendar year</p> <p>Condition 5 – Utilize certified Source Test vendors, use specified test methods, and submit documentation per deadline requirements</p> <p>Condition 8 - Maintenance via operators with assistance from CEM manufacturer</p> <p>Condition 9 – Operational procedures ensure compliance with 96 hour reporting requirement</p> <p>Condition 12 – Data Acquisition System data reduction and recordkeeping per specification</p> <p>Condition 14 – Turbine report submitted semi-annually, source test submitted annually</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: INTERMITTENT</p> <p>H. *Excursions, Exceedence, or other non-compliance: YES</p>



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1 - April 16, 2014

<p>A. Attachment # or Permit Condition #: Section 6 – Attachment STRMLN15LM2500-NOx,CO-rev 391</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: GE LM-2500 Gas Turbine Based Cogeneration Unit NOx and CO Applicable R</p> <p>Condition 1 – 3 Hour NOx average < 24 ppmvd @ 15% O2 while burning Natural Gas Condition 2 – Emissions Exemption: 1 hr for startup & shutdown Condition 3 – Source Test Annually at normal operating load. Test Notification and protocol submitted 15 days in advance with report submitted 45 days after test to include permit specified parameters Condition 4 – Operate and maintain CEMs & record permit specified data Condition 5 – CEMs calibration and maintenance per 40 CFR, part 51, Appendix P, Sections 3.0 through 3.9.5 Condition 6 – Written Notification of emissions violations within 96 hours Condition 7 – Permanent CEMs records, to include permit specified data Condition 8 – Upon request submit CEMs data to District Condition 9 – CEMs data reduced per 40 CFR, part 51, appendix P, paragraphs 5.0 – 5.3.3 Condition 10 – Records maintained per permit conditions Condition 11 – Turbine Operating hours report & annual source test report</p>	<p>E. Source test reference method</p> <p>See Source Test Summary Form 3 of 4</p> <p>EPA Method 20 -NOx ARB Method 100 -CO, O2 ASTM Method D 3588-91 -Fuel HV</p>
<p>C. Method of monitoring:</p> <p>Condition 1, 3 – Annual source performed on May 12, 2014 Condition 1, 2, 4, 7, 8, 9, 10 – Recordkeeping Condition 5 – Maintenance via operators with assistance from CEMs manufacturer Condition 6 – Operational procedures ensure compliance with 96 hour reporting requirement Condition 11 – Turbine report submitted semi-annually, source test submitted annually</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: April 17 - December 31, 2014

<p>A. Attachment # or Permit Condition #: Section 6 – Attachment STRMLN15LM2500-NOx,CO-rev 391</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: GE LM-2500 Gas Turbine Based Cogeneration Unit NOx and CO Applicable Requirements</p> <p>Condition 1 – 3 Hour NOx average < 24 ppmvd @ 15% O2 while burning Natural Gas Condition 2 – Emissions Exemption: 1 hr for startup & shutdown Condition 3 – Source Test Annually at normal operating load. Test Notification and protocol submitted 15 days in advance with report submitted 45 days after test to include permit specified parameters Condition 4 – Operate and maintain CEMs & record permit specified data Condition 5 – CEMs calibration and maintenance per 40 CFR, part 51, Appendix P, Sections 3.0 through 3.9.5 Condition 6 – Written Notification of emissions violations within 96 hours Condition 7 – Permanent CEMs records, to include permit specified data Condition 8 – Upon request submit CEMs data to District Condition 9 – CEMs data reduced per 40 CFR, part 51, appendix P, paragraphs 5.0 – 5.3.3 Condition 10 – Records maintained per permit conditions Condition 11 – Turbine Operating hours report & annual source test report</p>	<p>E. Source test reference method</p> <p>See Source Test Summary Form 3 of 4</p> <p>EPA Method 20 -NOx ARB Method 100 -CO, O2 ASTM Method D 3588-91 -Fuel HV</p>
<p>C. Method of monitoring:</p> <p>Condition 1, 3 – Annual source performed on May 12, 2014 Condition 1, 2, 4, 7, 8, 9, 10 – Recordkeeping Condition 5 – Maintenance via operators with assistance from CEMs manufacturer Condition 6 – Operational procedures ensure compliance with 96 hour reporting requirement Condition 11 – Turbine report submitted semi-annually, source test submitted annually</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>

**Period Covered by Compliance Certification: January 1 - April 16, 2014**

A. Attachment # or Permit Condition #: Section 6 – Attachment STRMLN15-SOx-rev 351	D. Frequency of monitoring: Monthly
B. Description: LM6000 and LM2500 Gas Turbine Based Cogeneration Units SOx Applicable Condition 1 – Gaseous Fuel < 50 grains sulfur per 100 Cu Ft. of fuel Condition 2 – If use PUC fuels used Rule 64 compliance is assumed Condition 3 – All emissions must be < 300 ppm SO2 at discharge Condition 4 – Upon Request source test for SO2 at discharge points	E. Source test reference method N/A
C. Method of monitoring: Condition 1-3 - Both the LM6000 and LM2500 exclusively use PUC-quality natural gas. Condition 4 – Source Test upon request	F. Currently in Compliance? YES G. Compliance Status: CONTINUOUS H. *Excursions, Exceedence, or other non-compliance: NO



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: April 17 - December 31, 2014

<p>A. Attachment # or Permit Condition #: Section 6 – Attachment STRMLN15-SOx-rev 441</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: LM6000 and LM2500 Gas Turbine Based Cogeneration Units SOx Applicable Requirements - Streamlined</p> <p>Condition 1 – Gaseous Fuel < 50 grains sulfur per 100 Cu Ft. of fuel</p> <p>Condition 2 – If use PUC fuels used Rule 64 compliance is assumed</p> <p>Condition 3 – All emissions must be < 300 ppm SO2 at discharge</p> <p>Condition 4 – Upon Request source test for SO2 at discharge points</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1-3 - Both the LM6000 and LM2500 exclusively use PUC-quality natural gas.</p> <p>Condition 4 – Source Test upon request</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status:</p> <p>CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>

**Period Covered by Compliance Certification: January 1 - April 16, 2014**

A. Attachment # or Permit Condition #: Section 6 – Attachment NESHAP KK	D. Frequency of monitoring: Monthly
B. Description: 40 CFR Part 63 Subpart KK Applicable Requirements Condition 1 – Use < 10 Ton per 12 month rolling period of each HAP Condition 2 – Use < 25 tons total per 12 month rolling period for all HAPs Condition 3 – HAP exclusion for various activities Condition 4 – Considered Area Source if comply with HAP limitations Condition 5 – Maintain monthly records and calculations of HAP materials and their HAP fractions Condition 6 – Provided 40 CFR 63.9(b) Notification	E. Source test reference method N/A
C. Method of monitoring: Conditions 1 – 6: Site maintained non-major HAP's status, by emitting less than 10 TPY of any one HAP, and less than 25 TPY of all HAP's. HAP emission and mass fraction monthly records required by permit condition are maintained.	F. Currently in Compliance? YES G. Compliance Status: CONTINUOUS H. *Excursions, Exceedence, or other non-compliance: NO



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: April 17 - December 31, 2014

<p>A. Attachment # or Permit Condition #: Section 6 – Attachment NESHAP KK</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: 40 CFR Part 63 Subpart KK Applicable Requirements</p> <p>Condition 1 – Use < 10 Ton per 12 month rolling period of each HAP</p> <p>Condition 2 – Use < 25 tons total per 12 month rolling period for all HAPs</p> <p>Condition 3 – HAP exclusion for various activities</p> <p>Condition 4 – Considered Area Source if comply with HAP limitations</p> <p>Condition 5 – Maintain monthly records and calculations of HAP materials and their HAP fractions</p> <p>Condition 6 – Provided 40 CFR 63.9(b) Notification</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring: Conditions 1 – 6: Site maintained non-major HAP's status, by emitting less than 10 TPY of any one HAP, and less than 25 TPY of all HAP's. HAP emission and mass fraction monthly records required by permit condition are maintained.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



Period Covered by Compliance Certification: January 1 - April 16, 2014

<p>A. Attachment # or Permit Condition #: Section 6 – Attachment ATCM Engine N1</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: ATCM for Stationary Compression Ignition Engines</p> <p>Condition 1.a-e: Use specified approved fuels</p> <p>Condition 2: Monthly log of engine hours of operation</p> <p>Conditions 3.a-e: Maintain fuel purchase records</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1.a-e: Use specified approved fuels</p> <p>Condition 2: Monthly log of engine hours of operation</p> <p>Conditions 3.a-e: Maintain fuel purchase records</p>	<p>F. Currently in Compliance? YES</p>
	<p>G. Compliance Status:</p> <p>CONTINUOUS</p>
	<p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: April 17 - December 31, 2014

A. Attachment # or Permit Condition #: Section 6 – Attachment ATCM Engine N1	D. Frequency of monitoring: Monthly
B. Description: ATCM for Stationary Compression Ignition Engines Condition 1.a-e: Use specified approved fuels Condition 2: Monthly log of engine hours of operation Conditions 3.a-e: Maintain fuel purchase records	E. Source test reference method N/A
C. Method of monitoring: Condition 1.a-e: Use specified approved fuels Condition 2: Monthly log of engine hours of operation Conditions 3.a-e: Maintain fuel purchase records	F. Currently in Compliance? YES
	G. Compliance Status: CONTINUOUS
	H. *Excursions, Exceedence, or other non-compliance: NO



Period Covered by Compliance Certification: January 1 - April 16, 2014

<p>A. Attachment # or Permit Condition #: Section 6 - Attachment 63 ZZZZ added as part of permit amendment 00015-381</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: 40 CFR Part 63 Subpart ZZZZ Applicable Requirements</p> <p>Condition 1 - Comply with 40 CFR 63 Subpart ZZZZ for CI RICE beginning May 3, 2013. The site does not operate any SI RICE.</p> <p>Condition 2 - Meet requirements for new, modified or reconstructed RICE if any are installed. (The site does not have any new, modified or reconstructed units.)</p> <p>Condition 3 - Annually certify all engines at site meet RICE MACT requirements.</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1 - Site records hours of operation for emergency and maintenance purposes using a non-resettable hour meter and demonstrates compliance with work practice standards.</p> <p>Condition 2 is not applicable.</p> <p>Condition 3 is satisfied by submitting an Annual Emergency Diesel Engine form for each applicable unit.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status:</p> <p>CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



Ventura County
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ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: April 17 - December 31, 2014

<p>A. Attachment # or Permit Condition #: Section 6 - Attachment 40CFR63 ZZZZ3</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: 40 CFR Part 63 Subpart ZZZZ Applicable Requirements</p> <p>Condition 1: Meet work practice standards including annual oil and filter changes, air cleaner inspections and belt/hose inspections. Report any delays due to emergency use to APCD. Condition 2: Operate and maintain IC engines according to manufacturer's emission related instructions or per site plan to maintain and operate equipment consistent with good air pollution control practices. Condition 3: RICE must be equipped with non-resettable hour meter. Condition 4: Minimize idle time during startup and minimize startup time to safe engine loading time, not to exceed 30 minutes. Condition 5: Limit non-emergency use of engines to no more than 100 hours per calendar year for maintenance and readiness testing and other allowed uses. Within this 100 hour allowance, limit hours for non-emergency non-maintenance/readiness testing (uses outlined in 63.6640 (f)) to no more than 50 hours per calendar year. Condition 6: Maintain records of maintenance conducted on stationary emergency RICE and record hours of operation for emergency use and non-emergency uses to demonstrate compliance with Condition 5. Condition 7 & 8: Non applicable condition - the site does not operate RICE for emergency demand response. Condition 9: Annually certify that all engines operate in compliance with 40 CFR Part 63 Subpart ZZZZ.</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1 -Maintain records to demonstrate that annual oil and filter changes, air cleaner inspections and annual belt/hose inspections are completed. Report any delays due to emergency use to APCD. Condition 2 - Operate and maintain IC engines according to site plans for maintenance and operation consistent with good air pollution control practices. Condition 3 - RICE are currently equipped with non-resettable hour meters. Condition 4 - Minimize idle time during startup and minimize startup time to safe engine loading time, not to exceed 30 minutes Condition 5 - Compliance with hour limitations is demonstrated by records of hours of operation for emergency, non-emergency and non-emergency/non- maintenance or readiness testing use. Condition 6 - Maintain records of maintenance conducted on stationary emergency RICE and record hours of operation for emergency use and non-emergency uses to demonstrate compliance with Condition 5. Condition 7 & 8 Non applicable condition - the site does not operate RICE for emergency demand response. Condition 9 - Annual Subpart ZZZZ compliance certification is satisfied by submitting Annual Emergency Diesel Engine form for each applicable unit.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>

Permit Section: 7

Permit Specific Conditions (Attachments)



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1 - April 16, 2014

<p>A. Attachment # or Permit Condition #: Section 7 – Attachment PO00015PC1rev 351</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Throughput & Consumption Limits and Solvent Records</p> <p>Condition 1 – Maintain Monthly throughput (emissions) records as detailed in Section No. 3 "Permitted Throughput and Consumption Limit Table.</p> <p>Condition 2 – Maintain a list of all exempt solvents used , a reference to the specific permit exemption status and their ROC content and points used per rolling 12 month period.</p> <p>Condition 3 - Permission to operate a rental boiler that is < 100 MMBTU/hr as an alternative to operating the 100 MMBTU/hr B-301 Boiler for up to 12 months. While in use, PO00015PC2 shall apply and PO00015PC4 shall not apply. The temporary boiler shall be equipped with Low NOx burners to meet the PO00015PC2 emissions limitations for the B-301 Boiler and the permittee shall maintain documentation that the temporary boiler meets the required emission limitations and records of usage of the temporary rental boiler.</p>	<p>E. Source test reference method N/A</p>
<p>C. Method of monitoring: Condition 1 – Monthly records of emissions specified in Table 3 throughput column are recorded.</p> <p>Condition 2 – Exempt Solvent list maintained.</p> <p>Condition 3 - Rental Boiler meeting Condition 3 requirements were met in January and February.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: April 17 - December 31, 2014

<p>A. Attachment # or Permit Condition #: Section 7 – Attachment PO00015PC1-rev411, 431, 441</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Throughput & Consumption Limits and Solvent Records</p> <p>Condition 1 – Maintain Monthly throughput (emissions) records as detailed in Section No. 3 "Permitted Throughput and Consumption Limit Table.</p> <p>Condition 2 – Maintain a list of all exempt solvents used , a reference to the specific permit exemption status and their ROC content and points used per rolling 12 month period.</p> <p>Condition 3 - Permission to operate a rental boiler that is < 100 MMBTU/hr as an alternative to operating the 100 MMBTU/hr B-301 Boiler for up to 12 months. While in use, PO00015PC2 shall apply and PO00015PC4 shall not apply. The temporary boiler shall be equipped with Low NOx burners to meet the PO00015PC2 emissions limitations for the B-301 Boiler and the permittee shall maintain documentation that the temporary boiler meets the required emission limitations and records of usage of the temporary rental boiler.</p>	<p>E. Source test reference method N/A</p>
<p>C. Method of monitoring: Condition 1 – Monthly records of emissions specified in Table 3 throughput column are recorded. Condition 2 – Exempt Solvent list maintained. Condition 3 - Rental boiler was not used during this reporting period.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1 - April 16, 2014

<p>A. Attachment # or Permit Condition #: Section 7 – Attachment PO00015PC2-rev 381, as amended in Temporary Permits 00015-431 and 00015-114</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Combustion Emissions Units- LM6000, LM2500, B&W Steam Boiler, 1X Hot Air, 1X Yankee Furnace, 2X Furnaces</p> <p>Condition 1 – Specifies monitoring requirements and calculations to demonstrate compliance with TPY emissions limits for Combustion Unit group identified in this condition.</p> <p>Condition 2 – Restricts fuel used in specified combustion units to Natural Gas (NG)</p> <p>Condition 3 – Maintain records: 12 mo. Rolling average fuel usage and emissions based on Emission Factors and CEM units specified in this condition and condition 1 above.</p> <p>INFORMATIONAL - Increased CO hourly limit and emission factor for the LM2500 pursuant to application # 00015-381</p> <p>INFORMATIONAL - Increased CO hourly limit and emission factor for the LM6000 pursuant to application # 00015-431 and Agency letter dated July 8, 2013. Emissions from use of Temporary Boiler operated pursuant to Temporary PTO No. 00015-114 are included in tracked emissions.</p>	<p>E. Source test reference method N/A</p>
<p>C. Method of monitoring: Condition 1 – Monthly monitoring of emissions records to ensure compliance with facility wide emissions limits.</p> <p>Condition 2 – Facility exclusively utilizes Natural Gas to fire all specified combustion units at facility.</p> <p>Condition 3 - CEMS data from the turbines is used to maintain 12 month rolling averages for NOx, CO, and NH3. All other 12 month rolling averages are maintained by Emission Factors and fuel use.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



Period Covered by Compliance Certification: April 17 - December 31, 2014

<p>A. Attachment # or Permit Condition #: Section 7 – Attachment PO00015PC2-rev 411, 431, 441</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Combustion Emissions Units- LM6000, LM2500, B&W Steam Boiler, 1X Hot Air, 1X Yankee Furnace, 2X Furnaces</p> <p>Condition 1 – Specifies monitoring requirements and calculations to demonstrate compliance with TPY emissions limits for Combustion Unit group identified in this condition.</p> <p>Condition 2 – Restricts fuel used in specified combustion units to Natural Gas (NG)</p> <p>Condition 3 – Maintain records: 12 mo. Rolling average fuel usage and emissions based on Emission Factors and CEM units specified in this condition and condition 1 above.</p> <p>Condition 4 - The Table 4 CO hourly lb/hour for the LM2500 shall be demonstrated by the annual source test requirement in STRMLIN15LM2500-NOx, CO.</p> <p>Condition 5 - The The Table 4 CO hourly lb/hour for the LM600 shall be demonstrated by the annual source test requirement in STRMLIN15LM6000-NOx.</p> <p>Condition 6 - Permission to operate a rental boiler that is < 100 MMBTU/hr as an alternative to operating the 100 MMBTU/hr B-301 Boiler for up to 12 months. While in use, PO00015PC2 shall apply and PO00015PC4 shall not apply. The temporary boiler shall be equipped with Low NOx burners to meet the PO00015PC2 emissions limitations for the B-301 Boiler and shall maintain documentation that the temporary boiler meets the B-301 emission limitations and records of usage of the temporary rental boiler.</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1 – Monthly monitoring of emissions records to ensure compliance with combustion emission limits.</p> <p>Condition 2 – Facility exclusively utilized Natural Gas to fire all specified combustion units at facility.</p> <p>Condition 3 - CEMS data from the turbines is used to maintain 12 month rolling averages for NOx, CO, and NH3. All other 12 month rolling averages are maintained by Emission Factors and fuel use.</p> <p>Condition 4 & 5 - Source Test records demonstrating the Table 4 limits for each turbine was performed and submitted per the STRMLN Requirements for each turbine.</p> <p>Condition 6 - Emissions generated from fuel usage in the rental boiler and the B-301 Boiler are included in the condition 1 required monitoring. Rental boiler specified and guaranteed to meet NOx and CO emission limits specified in permit.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1 - April 16, 2014

<p>A. Attachment # or Permit Condition #: Section 7 – Attachment PO00015PC3-rev351</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: 2X Papermachine Hot Air Condition 1 –Emission limitations: NOx < 0.08 lb./MMBTU, CO < 0.045 lb./MMBTU Condition 2 –Fuel and air settings locked in position as specified in permit. Settings recorded every 6 months Condition 3 – Source test the Predryer Furnace before March 31, 2013 using ARB Method 100 for NOx, CO and O2. Notification & Test Protocol to District 15 days in advance. Report within 45 after test. Condition 4 – Perform a Screening Analysis with portable analyzer or perform a Source Test on the Yankee Hot Air Furnace once every 24 months using ARB Method 100 for NOx, CO and O2. Notification & Test Protocol to District 15 days in advance. Report within 45 after test.</p>	<p>E. Source test reference method: F. Currently in Compliance? YES G. Compliance Status: CONTINUOUS</p>
<p>C. Method of monitoring: Condition 1 - Both Furnaces demonstrated compliance to the NOx and CO limits per their last Source Test Condition 2 – Fuel Linkage settings are secured in position. Verification was performed in March and October Condition 3 - Condition requirements were met as demonstrated on 9-26-2012, before the March 31, 2013 due date. Condition 4 - Compliance was demonstrated by a stack test conducted on 9-10-14 using the approved alternate compliance demonstration method (rather than portable analyzer).</p>	<p>F. Currently in Compliance? YES G. Compliance Status: CONTINUOUS H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: April 17 - December 31, 2014

<p>A. Attachment # or Permit Condition #: Section 7 – Attachment PO00015PC3-rev351</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: 2X Papermachine Hot Air Condition 1 –Emission limitations: NOx < 0.08 lb./MMBTU, CO < 0.045 lb./MMBTU Condition 2 –Fuel and air settings locked in position as specified in permit. Settings recorded every 6 months Condition 3 – Source test the Predryer Furnace before March 31, 2018 using ARB Method 100 for NOx, CO and O2. Notification & Test Protocol to District 15 days in advance. Report within 45 after test. Condition 4 – Perform a Screening Analysis with portable analyzer or perform a Source Test on the Yankee Hot Air Furnace once every 24 months using ARB Method 100 for NOx, CO and O2. Notification & Test Protocol to District 15 days in advance. Report within 45 after test.</p>	<p>E. Source test reference method: F. Currently in Compliance? YES G. Compliance Status: CONTINUOUS</p>
<p>C. Method of monitoring: Condition 1 - Both Furnaces demonstrated compliance to the NOx and CO limits per their last Source Test Condition 2 – Fuel Linkage settings are secured in position. Verification was performed in March and October Condition 3 - Condition requirements were met as demonstrated on 9-26-2012, before the March 31, 2013 due date. Condition 4 - Compliance was demonstrated by a stack test conducted on 9-10-14 using the approved alternate compliance demonstration method (rather than portable analyzer).</p>	<p>F. Currently in Compliance? YES G. Compliance Status: CONTINUOUS H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1 - April 16, 2014

<p>A. Attachment # or Permit Condition #: Section 7 – Attachment PO00015PC4 –rev351</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Flue Gas Recirculation (FGR) Requirements for Babcock & Wilcox Steam Boiler (does not apply to temporary boilers allowed by PO00015PC.C3) Condition 1.a-b – FGR system settings locked (physically pinned) in place per permit specifications. Parameters to be monitored, measured, and recorded on monthly basis.</p>	<p>E. Source test reference method N/A</p>
<p>C. Method of monitoring: Condition 1.a-b Monthly monitoring of mechanical linkage of fuel and air damper. Linkages are pinned in place. B-301 Boiler was returned to service in February. Compliance was demonstrated by performing a source test meeting the requirements in Attachment 74.15N1 on 3/13/2014.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: April 17 - December 31, 2014

<p>A. Attachment # or Permit Condition #: Section 7 – Attachment PO00015PC4 –rev 411, 431, 441</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Flue Gas Recirculation (FGR) Requirements for Babcock & Wilcox Steam Boiler Condition 1.a-b – FGR system settings locked (physically pinned) in place per permit specifications. Parameters to be monitored, measured, and recorded on monthly basis.</p>	<p>E. Source test reference method N/A</p>
<p>C. Method of monitoring: Condition 1.a-b Monthly monitoring of mechanical linkage of fuel and air damper. Linkages are pinned in place. Compliance was demonstrated by performing a source test meeting the requirements in Attachment 74.15N1 on 3/13/2014.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



Period Covered by Compliance Certification: January 1 - April 16, 2014

<p>A. Attachment # or Permit Condition #: Section 7 – Attachment PO00015PC5-rev351</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Particulate Matter Emission Requirements 1X Paper Machine, 2X Paper Machine, Wet Lapper and Converting Line Rooms</p> <p>Condition 1: Emission Limitations: 1X PM < 6.75 lbs/hr., 2X PM < 3.99 lbs/hr., Wet Lapper < 0.10</p> <p>Condition 2: To demonstrate compliance with emission limitations, daily average of hourly readings of scrubber pressure drop and liquor flow rate for 1X, 2X and wet lapper scrubbers shall be recorded and maintained no less than the values specified in this condition.</p> <p>Condition 3.a-e: Daily Record not required for less than full day operation. Excursions to be corrected expeditiously, meters and gauges maintained per facility plan, and made available upon request. Excursions require summary of corrective actions. Semi annual report of Excursions.</p> <p>Condition 4.a-b: PM emissions must meet limitations specified in Rules 52 and 53 (table limits in each rule)</p> <p>Condition 5: Compliance with Rule 52 & 53 achieved with compliance with Condition 1 and 2</p> <p>Condition 6: Converting room emissions shall be re-circulated back into room</p>	<p>E. Source test reference method N/A</p>
<p>C. Method of monitoring: Condition 1-2, 4-5: 1X, 2X, and Wet Lapper Scrubber operation to ensure Pressure Drop, and Liquor Flow Rate are not less than the permit specified values.</p> <p>Condition 3 –Records of Hourly and Daily operation kept. Permittee will respond to any excursion as specified in the permit and will document and submit corrective action in the Semi Annual Report as required by the permit.</p> <p>Condition 6 – Converting Room emissions are circulated back into room via equipment listed in the Section 5 Insignificant Activities List.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



Period Covered by Compliance Certification: April 17 - December 31, 2014

<p>A. Attachment # or Permit Condition #: Section 7 – Attachment PO00015PC5-rev 441</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Particulate Matter Emission Requirements 1X Paper Machine, 2X Paper Machine, Wet Lapper and Converting Line Rooms</p> <p>Condition 1: Emission Limitations: 1X PM < 6.75 lbs/hr., 2X PM < 3.99 lbs/hr., Wet Lapper < 0.10</p> <p>Condition 2: To demonstrate compliance with emission limitations, daily average of hourly readings of scrubber pressure drop and liquor flow rate for 1X, 2X and wet lapper scrubbers shall be recorded and maintained no less than the values specified in this condition.</p> <p>Condition 3.a-e: Daily Record not required for less than full day operation. Excursions to be corrected expeditiously, meters and gauges maintained per facility plan, and made available upon request. Excursions require summary of corrective actions. Semi annual report of Excursions.</p> <p>Condition 4.a-b: PM emissions must meet limitations specified in Rules 52 and 53 (table limits in each rule)</p> <p>Condition 5: Compliance with Rule 52 & 53 achieved with compliance with Condition 1 and 2</p> <p>Condition 6: Converting room emissions shall be re-circulated back into room</p>	<p>E. Source test reference method N/A</p>
<p>C. Method of monitoring: Condition 1-2, 4-5: 1X, 2X, and Wet Lapper Scrubber operation to ensure Pressure Drop, and Liquor Flow Rate are not less than the permit specified values.</p> <p>Condition 3 –Records of Hourly and Daily operation kept. Permittee will respond to any excursion as specified in the permit and will document and submit corrective action in the Semi Annual Report as required by the permit.</p> <p>Condition 6 – Converting Room emissions are circulated back into room via equipment listed in the Section 5 Insignificant Activities List.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1 - April 16, 2014

<p>A. Attachment # or Permit Condition #: Section 7 – Attachment PO00015PC6-rev351</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: ROC Emission Requirements Manufacturing Chemicals for Ink and Additive Applications</p> <p>Condition 1 – ROC Emission limit for manufacturing chemicals used in inks and additives for producing, converting, and packaging toilet tissue and paper towels shall not exceed 60 tons per year in any 12 month period.</p> <p>Condition 2 – Maintain monthly records of ROC emissions from manufacturing chemicals used in inks and additives for producing, converting and packaging toilet tissue and paper towels and demonstrate compliance based on 12-month rolling average emissions.</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1 – Facility ROC emissions rates are recorded and tracked to ensure 12 month rolling totals maintained below 60 TPY</p> <p>Condition 2 – Maintain monthly usage data for ROC containing manufacturing chemicals</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: April 17 - December 31, 2014

<p>A. Attachment # or Permit Condition #: Section 7 – Attachment PO00015PC6-rev351</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: ROC Emission Requirements Manufacturing Chemicals for Ink and Additive Applications</p> <p>Condition 1 – ROC Emission limit for manufacturing chemicals used in inks and additives for producing, converting, and packaging toilet tissue and paper towels shall not exceed 60 tons per year in any 12 month period.</p> <p>Condition 2 – Maintain monthly records of ROC emissions from manufacturing chemicals used in inks and additives for producing, converting and packaging toilet tissue and paper towels and demonstrate compliance based on 12-month rolling average emissions.</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1 – Facility ROC emissions rates are recorded and tracked to ensure 12 month rolling totals maintained below 60 TPY</p> <p>Condition 2 – Maintain monthly usage data for ROC containing manufacturing chemicals</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1 - April 16, 2014

<p>A. Attachment # or Permit Condition #: Section 7 – Attachment PO00015PC7-rev391</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Federal PSD Permit Requirements- Cogeneration Turbine (LM-6000), Cogeneration Turbine (LM-2500), Babcock & Wilcox Steam Boiler, 1X Paper Machine Hot Air Furnace, and 1X Papermachine “Yankee” Hood Furnace</p> <p>Condition 1 – If request increase in permitted NOx emissions for specified combustion sources above 250 TPY, submit PSD application for LM6000 turbine</p>	<p>E. Source test reference method N/A</p>
<p>C. Method of monitoring: Condition 1 – If request increase in NOx emissions in excess of 250 TPY, will submit PSD application for LM6000 turbine.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: April 17 - December 31, 2014

A. Attachment # or Permit Condition #: Section 7 – Attachment PO00015PC7-rev391	D. Frequency of monitoring: Monthly
B. Description: Federal PSD Permit Requirements- Cogeneration Turbine (LM-6000), Cogeneration Turbine (LM-2500), Babcock & Wilcox Steam Boiler, 1X Paper Machine Hot Air Furnace, and 1X Papermachine "Yankee" Hood Furnace Condition 1 – If request increase in permitted NOx emissions for specified combustion sources above 250 TPY, submit PSD application for LM6000 turbine	E. Source test reference method N/A
C. Method of monitoring: Condition 1 – If request increase in NOx emissions in excess of 250 TPY, will submit PSD application for LM6000 turbine.	F. Currently in Compliance? YES G. Compliance Status: CONTINUOUS H. *Excursions, Exceedence, or other non-compliance: NO



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1 - April 16, 2014

<p>A. Attachment # or Permit Condition #: Section 7 – Attachment PO00015PC8</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: ERC Certificate No. 1166</p> <p>Condition 1 –All motor vehicle parking and traffic on paved surfaces only. No unpaved areas readily accessible by vehicle. Except for emergencies, construction, maintenance, and agricultural use.</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring: Condition 1 – Access to pave areas is restricted. Signs indicating prohibition for parking and travel over unpaved areas are posted through out the site. Parking and traffic expectations are communicated and enforced by facility personnel.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: April 17 - December 31, 2014

A. Attachment # or Permit Condition #: Section 7 – Attachment PO00015PC8	D. Frequency of monitoring: Monthly
B. Description: ERC Certificate No. 1166 Condition 1 –All motor vehicle parking and traffic on paved surfaces only. No unpaved areas readily accessible by vehicle. Except for emergencies, construction, maintenance, and agricultural use.	E. Source test reference method N/A
C. Method of monitoring: Condition 1 – Access to paved areas is restricted. Signs indicating prohibition for parking and travel over unpaved areas are posted throughout the site. Parking and traffic expectations are communicated and enforced by facility personnel.	F. Currently in Compliance? YES
	G. Compliance Status: CONTINUOUS
	H. *Excursions, Exceedence, or other non-compliance: NO

Permit Section: 8

General Applicable Requirements (Attachments)



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1 - April 16, 2014

<p>A. Attachment # or Permit Condition #: Section 8 – Attachment Rule 50 (04/13/04)</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Opacity</p> <p>Condition 1 – 3 Minute emissions in hour less than 20% Opacity</p> <p>Condition 2 – Routine Surveillance and record of visible emissions other than uncombined water</p> <p>Condition 3 – Annual compliance certification, including site survey</p> <p>Condition 4 – EPA Method 9 survey per District request</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1 & 2 – No visible emissions were observed in 2014</p> <p>Condition 3 - Opacity Survey completed on July 22, 2014</p> <p>Condition 4 - Perform EPA Method 9 survey upon District request</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: April 17 - December 31, 2014

<p>A. Attachment # or Permit Condition #: Section 8 – Attachment Rule 50 (04/13/04)</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Opacity Condition 1 – 3 Minute emissions in hour less than 20% Opacity Condition 2 – Routine Surveillance and record of visible emissions other than uncombined water Condition 3 – Annual compliance certification, including site survey Condition 4 – EPA Method 9 survey per District request</p>	<p>E. Source test reference method N/A</p>
<p>C. Method of monitoring: Condition 1 & 2 – No visible emissions were observed in 2014 Condition 3 - Opacity Survey completed on July 22, 2014 Condition 4 - Perform EPA Method 9 survey upon District request</p>	<p>F. Currently in Compliance? YES G. Compliance Status: CONTINUOUS H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1 - April 16, 2014

<p>A. Attachment # or Permit Condition #: Section 8 – Attachment 54.B.1 (01/14/14) <i>DISREGARD like you did Rule 50?</i></p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Sulfur Compounds – Sulfur Emissions from Combustion Operations at Point of Discharge</p> <p>Condition 1 – Point of Discharge SO₂ concentrations < 300 ppmvd, from combustion operations</p> <p>Condition 2 – Comply with fuel Sulfur content limits per Rule 64. No monitoring required.</p> <p>Condition 3 – Upon District Request determine point of Discharge concentrations of SO₂</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1 – Compliance with permit condition Attachment P00015PC2. Only PUC-quality natural gas and CARB approved diesel used on site in 2014</p> <p>Conditions 2 – Fuel Oil Sulfur Content provided by supplier at each delivery. Gaseous sulfur content meeting PUC Quality requirements. Data furnished to district upon request.</p> <p>Condition 3 – Furnish District with data upon request.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: April 17 - December 31, 2014

A. Attachment # or Permit Condition #: Section 8 – Attachment 54.B.1 (01/14/14)	D. Frequency of monitoring: Monthly
B. Description: Sulfur Compounds – Sulfur Emissions from Combustion Operations at Point of Discharge Condition 1 – Point of Discharge SO ₂ concentrations < 300 ppmvd (corrected to 3% oxygen for boilers and 15% oxygen for turbines), from combustion operations specified. Condition 2 – Comply with fuel Sulfur content limits per Rule 64. No monitoring required. Condition 3 – Upon District Request determine point of Discharge concentrations of SO ₂	E. Source test reference method N/A
C. Method of monitoring: Condition 1 – Compliance with permit condition Attachment P00015PC2. Only PUC-quality natural gas and CARB approved diesel used on site in 2014 Conditions 2 – Fuel Oil Sulfur Content provided by supplier at each delivery. Gaseous sulfur content meeting PUC Quality requirements. Data furnished to district upon request. Condition 3 – Furnish District with data upon request.	F. Currently in Compliance? YES G. Compliance Status: CONTINUOUS H. *Excursions, Exceedence, or other non-compliance: NO



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1 - April 16, 2014

<p>A. Attachment # or Permit Condition #: Section 8 - Attachment 54.B.2</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Sulfur compounds – SO₂ Concentrations.</p> <p>Condition 1 – Property Line SO₂ concentrations: 1 hr. < 0.25 ppmvd, 24 hr. < 0.04 ppmvd</p> <p>Condition 2 – Provide fuel or exhaust analysis along with modeling data or other demonstration to District upon request</p> <p>Condition 3a-c – Upon District Request determine ground level concentrations of SO₂</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1 - Compliance with permit condition Attachment P00015PC2. Only PUC-quality natural gas, and CARB approved diesel used on site in 2014</p> <p>Conditions 2 – Fuel Analysis provided by suppliers at request of facility. Exhaust analysis based on emissions factors incorporated into facility AB2588 Health Risk Assessment.</p> <p>Condition 3 – Furnish District with data upon request.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: April 17 - December 31, 2014

<p>A. Attachment # or Permit Condition #: Section 8 - Attachment 54.B.2 (01/14/14)</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Sulfur compounds – SO₂ Concentrations.</p> <p>Condition 1 – Property Line SO₂ concentrations: 1 hr. < 0.25 ppmvd, 24 hr. < 0.04 ppmvd</p> <p>Condition 2 - Property line 1 hour sulfur dioxide limit of 0.075 ppm</p> <p>Condition 3 – Provide fuel or exhaust analysis along with modeling data or other demonstration to District upon request</p> <p>Condition 4a-c – Upon District Request determine ground level concentrations of SO₂</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1 - Compliance with permit condition Attachment P00015PC2. Only PUC-quality natural gas, and CARB approved diesel used on site in 2014</p> <p>Conditions 2 – If the District requires ambient air monitoring, test methods specified will be employed.</p> <p>Conditions 3 - Fuel Analysis provided by suppliers at request of facility. Exhaust analysis based on emissions factors incorporated into facility AB2588 Health Risk Assessment.</p> <p>Condition 4– Furnish District with data upon request.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1 - April 16, 2014

<p>A. Attachment # or Permit Condition #: Section 8 – Attachment 55 (06/10/08)</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Fugitive Dust</p> <p>Condition 1 – Do not cause or allow fugitive dust such that is visible past the property line.</p> <p>Condition 2 – Do not cause or allow fugitive dust to cause 20% opacity as measured by EPA Method 9 using Rule 55 modifications.</p> <p>Condition 3 – Do not allow “track-out” to extend ≥25ft unless control measures are utilized</p> <p>Condition 4 - Remove all “track-out” at the conclusion of each workday or evening shift</p> <p>Condition 5 - Comply with specific activity requirements for earth moving, bulk material handling, and truck hauling activities</p> <p>Condition 6- Comply with specific record keeping requirements for each type of activity</p> <p>Condition 7 - Annually certify that all applicable source of dust are in compliance or certify that there are no operations, disturbed surface areas, or man made conditions that are subject to Rule 55.</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1-2– Routine activities do not result in fugitive dust causing visible emissions beyond specified boundaries. Outdoor projects are controlled and monitored such that Conditions `1-2 are met.</p> <p>Condition 3 – Site property is such that the possibility of track out is minimized. For projects where the possibility of track out exists – vehicles are inspected and managed to prevent track out.</p> <p>Condition 4 – When applicable, Track Out is removed at the conclusion of each workday or shift.</p> <p>Condition 5 – Site utilizes procedures and methods for prevent fugitive dust.</p> <p>Condition 6 – When required records are kept.</p> <p>Condition 7 – Ongoing assessment of site activity to ensure Rule 55 compliance.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: April 17 - December 31, 2014

<p>A. Attachment # or Permit Condition #: Section 8 – Attachment 55 (06/10/08)</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Fugitive Dust</p> <p>Condition 1 – Do not cause or allow fugitive dust such that is visible past the property line.</p> <p>Condition 2 – Do not cause of allow fugitive dust to cause 20% opacity as measured by EPA Method 9 using Rule 55 modifications.</p> <p>Condition 3 – Do not allow “track-out” to extend ≥25ft unless control measures are utilized</p> <p>Condition 4 - Remove all “track-out” at the conclusion of each workday or evening shift</p> <p>Condition 5 - Comply with specific activity requirements for earth moving, bulk material handling, and truck hauling activities</p> <p>Condition 6- Comply with specific record keeping requirements for each type of activity</p> <p>Condition 7 - Annually certify that all applicable source of dust are in compliance or certify that there are no operations, disturbed surface areas, or man made conditions that are subject to Rule 55.</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1-2– Routine activities do not result in fugitive dust causing visible emissions beyond specified boundaries. Outdoor projects are controlled and monitored such that Conditions `1-2 are met.</p> <p>Condition 3 – Site property is such that the possibility of track out is minimized. For projects where the possibility of track out exists – vehicles are inspected and managed to prevent track out.</p> <p>Condition 4 – When applicable, Track Out is removed at the conclusion of each workday or shift.</p> <p>Condition 5 – Site utilizes procedures and methods for prevent fugitive dust.</p> <p>Condition 6 – When required records are kept.</p> <p>Condition 7 – Ongoing assessment of site activity to ensure Rule 55 compliance.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1 - April 16, 2014

<p>A. Attachment # or Permit Condition #: Section 8 – Attachment 57.1 (01/11/05)</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Particulate Matter Emissions from Fuel Burning Equipment</p> <p>Condition 1 – PM shall not exceed 0.12 lbs/Mmbtu</p> <p>Condition 2 – Compliance demonstration required upon district request</p> <p>Condition 3 – Periodic monitoring not required. Certify compliance by referring to District Rule 57.B analysis dated 12/3/97</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring: Condition 1 – Satisfy Conditions 2 &3 of this attachment.</p> <p>Condition 2 – Monitoring not required based on district analysis (Per comments in permit, Table 1.C.3, Condition 57.1)</p> <p>Condition 3 – Periodic monitoring not required. Compliance certified via District analysis of Rule 57.B, dated 12/3/97.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: April 17 - December 31, 2014

<p>A. Attachment # or Permit Condition #: Section 8 – Attachment 57.1 (01/11/05)</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Particulate Matter Emissions from Fuel Burning Equipment</p> <p>Condition 1 – PM shall not exceed 0.12 lbs/Mmbtu</p> <p>Condition 2 – Compliance demonstration required upon district request</p> <p>Condition 3 – Periodic monitoring not required. Certify compliance by referring to District Rule 57.B analysis dated 12/3/97</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1 – Satisfy Conditions 2 &3 of this attachment.</p> <p>Condition 2 – Monitoring not required based on district analysis (Per comments in permit, Table 1.C.3, Condition 57.1)</p> <p>Condition 3 – Periodic monitoring not required. Compliance certified via District analysis of Rule 57.B, dated 12/3/97.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1 - April 16, 2014

<p>A. Attachment # or Permit Condition #: Section 8 – Attachment 64.B.1 (04/13/99)</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Sulfur Content of Fuels – Gaseous Fuel Requirements</p> <p>Condition 1 – Gaseous Fuel sulfur compounds < 788 ppmvd</p> <p>Condition 2 – Periodic Monitoring not required if using PUC Natural Gas</p> <p>Condition 3 – Analyze fuel if using non PUC quality fuel</p> <p>Condition 4a-b – Monitoring required if landfill or oilfield gaseous fuel is used</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring: Conditions 1-4: Maintain records showing that only PUC Quality natural gas is used, therefore no other monitoring is required. Facility does not use landfill or oilfield gaseous fuel.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: April 17 - December 31, 2014

<p>A. Attachment # or Permit Condition #: Section 8 – Attachment 64.B.1 (04/13/99)</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Sulfur Content of Fuels – Gaseous Fuel Requirements</p> <p>Condition 1 – Gaseous Fuel sulfur compounds < 788 ppmvd</p> <p>Condition 2 – Periodic Monitoring not required if using PUC Natural Gas</p> <p>Condition 3 – Analyze fuel if using non PUC quality fuel</p> <p>Condition 4a-b – Monitoring required if landfill or oilfield gaseous fuel is used</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring: Conditions 1-4: Maintain records showing that only PUC Quality natural gas is used, therefore no other monitoring is required. Facility does not use landfill or oilfield gaseous fuel.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1 - April 16, 2014

<p>A. Attachment # or Permit Condition #: Section 8 – Attachment 64.B.2 (04/13/99)</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Sulfur Content of Fuels – Liquid Fuel Requirements</p> <p>Condition 1 – No liquid Fuel usage with sulfur content > 0.5% by weight</p> <p>Condition 2 – If only use ARB quality liquid fuel compliance is assured without monitoring</p> <p>Condition 3 – Requirements for use of non ARB liquid fuels</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring:</p> <p>Conditions 1 & 2 – Maintain records of exclusive use of ARB compliant liquid fuel used on site in 2014– No other monitoring is required.</p> <p>Condition 3 – Monitor per permit requirements if use non ARB quality liquid fuel</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: April 17 - December 31, 2014

<p>A. Attachment # or Permit Condition #: Section 8 – Attachment 64.B.2 (04/13/99)</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Sulfur Content of Fuels – Liquid Fuel Requirements</p> <p>Condition 1 – No liquid Fuel usage with sulfur content > 0.5% by weight</p> <p>Condition 2 – If only use ARB quality liquid fuel compliance is assured without monitoring</p> <p>Condition 3 – Requirements for use of non ARB liquid fuels</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring:</p> <p>Conditions 1 & 2 – Maintain records of exclusive use of ARB compliant liquid fuel used on site in 2014– No other monitoring is required.</p> <p>Condition 3 – Monitor per permit requirements if use non ARB quality liquid fuel</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1 - April 16, 2014

<p>A. Attachment # or Permit Condition #:</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>Section 8 – Attachment 74.6 (11/11/03)</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>B. Description: Surface Cleaning and Degreasing</p> <p>Condition 1.a-c: Limitations on use of solvents in surface cleaning. Solvents used for equipment cleanup and other cleanup of uncured coatings, adhesives, inks or resins and used for cleaning of electronic components shall not exceed < 900 g/l ROC & < 33 mmHg partial pressure. Cleaning solvents used for other purposes shall not exceed 25 g/l as applied. Condition 2.a-d: If use solvents > 25 g/l ROC are used, one of the specified cleaning methods must be employed. Specified methods include wipe cleaning; non-atomized solvent flow, dip, or flush with solvent collection and solvent capacity of less than 1 liter (unless cleaning equipment stated in conditions 8-10 are used), or solvent application from hand held spray or squirt bottle with a capacity of less than one liter; or use of enclosed gun washer. Condition 3: No liquid cleaning solvent leaks from equipment or containers. Condition 4: No solvents shall be solicited, supplied, sold, or used that would violate Rule 74.6. Condition 5: Use less than one gallon of halogenated solvents per week for cold cleaning. If use maintain records. Condition 6: Solvent stored in non-absorbent containers and closed except for filling or emptying. Condition 7: Dispose of solvents and solvent residues as specified in California Hazardous Waste Code. Condition 8.a-f: Cold Cleaning equipment requirements, except for remote reservoir cold cleaners. Condition 9.a-e: Remote Reservoir cold cleaner equipment requirements. Condition 10.a-g: Cold Cleaner operating requirements. Condition 11.a-h: Rule 74.6 exemptions Condition 12.a-o: Condition 1 exemptions Condition 13: Condition 1 and 2 exemptions Condition 14.a-d: Solvent Material recordkeeping requirements. Upon district request, make information available to district personnel Condition 15: Maintain records and perform routine surveillance of solvent cleaning activities</p>	
<p>C. Method of monitoring:</p> <p>Conditions 1–4, 6-7: Compliance for permit conditions pertaining to solvent storage and handling is satisfied via personnel training and observation. Chemical Approval System ensures conformity with solvent ROC content limits.</p> <p>Condition 5: Facility does not use halogenated cold cleaner solvents</p> <p>Conditions 8-10: Cold cleaners are exempt per section 5 of our permit.</p> <p>Condition 11: Exempted Solvents including Cold Cleaner Solvent is maintained on list per Section 7, PC1.C2</p> <p>Condition 14: Recordkeeping per permit requirements.</p> <p>Condition 15: Visual surveillance performed routinely. Site uses chemical approval process to confirm that only ROC content acceptable solvents are purchased and used on site.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



Period Covered by Compliance Certification: April 17 - December 31, 2014

<p>A. Attachment # or Permit Condition #:</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>Section 8 – Attachment 74.6 (11/11/03)</p>	<p>E. Source test reference method</p>
<p>B. Description: Surface Cleaning and Degreasing</p>	<p>N/A</p>
<p>Condition 1.a-c: Limitations on use of solvents in surface cleaning. Solvents used for equipment cleanup and other cleanup of uncured coatings, adhesives, inks or resins and used for cleaning of electronic components shall not exceed < 900 g/l ROC & < 33 mmHg partial pressure. Cleaning solvents used for other purposes shall not exceed 25 g/l as applied. Condition 2.a-d: If use solvents > 25 g/l ROC are used, one of the specified cleaning methods must be employed. Specified methods include wipe cleaning; non-atomized solvent flow, dip, or flush with solvent collection and solvent capacity of less than 1 liter (unless cleaning equipment stated in conditions 8-10 are used), or solvent application from hand held spray or squirt bottle with a capacity of less than one liter; or use of enclosed gun washer. Condition 3: No liquid cleaning solvent leaks from equipment or containers. Condition 4: No solvents shall be solicited, supplied, sold, or used that would violate Rule 74.6. Condition 5: Use less than one gallon of halogenated solvents per week for cold cleaning. If use maintain records. Condition 6: Solvent stored in non-absorbent containers and closed except for filling or emptying. Condition 7: Dispose of solvents and solvent residues as specified in California Hazardous Waste Code. Condition 8.a-f: Cold Cleaning equipment requirements, except for remote reservoir cold cleaners. Condition 9.a-e: Remote Reservoir cold cleaner equipment requirements. Condition 10.a-g: Cold Cleaner operating requirements. Condition 11.a-h: Rule 74.6 exemptions Condition 12.a-o: Condition 1 exemptions Condition 13: Condition 1 and 2 exemptions Condition 14.a-d: Solvent Material recordkeeping requirements. Upon district request, make information available to district personnel Condition 15: Maintain records and perform routine surveillance of solvent cleaning activities</p>	<p>F. Currently in Compliance? YES</p>
<p>C. Method of monitoring: Conditions 1–4, 6-7: Compliance for permit conditions pertaining to solvent storage and handling is satisfied via personnel training and observation. Chemical Approval System ensures conformity with solvent ROC content limits.</p>	<p>G. Compliance Status: CONTINUOUS</p>
<p>Condition 5: Facility does not use halogenated cold cleaner solvents</p>	<p>H. *Excursions, Exceedence, or other non-compliance: NO</p>
<p>Conditions 8-10: Cold cleaners are exempt per section 5 of our permit.</p>	
<p>Condition 11: Exempted Solvents including Cold Cleaner Solvent is maintained on list per Section 7, PC1.C2</p>	
<p>Condition 14: Recordkeeping per permit requirements.</p> <p>Condition 15: Visual surveillance performed routinely. Site uses chemical approval process to confirm that only ROC content acceptable solvents are purchased and used on site.</p>	



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1 - April 16, 2014

<p>A. Attachment # or Permit Condition #: Section 8 – Attachment 74.11.1</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Large Water Heaters and Small Boilers</p> <p>Condition 1.a-b: Requirements for NOx emissions and certified boilers and heaters for new small units (75-400 MBTU/hr)</p> <p>Condition 2.a-b: Requirements for NOx emissions and certified boilers and heaters for new large units (400-2,000 MBTU/hr)</p> <p>Condition 3 – Maintain permit design records for heaters and boilers that are 75-2,000 MBTU/hr.</p> <p>Condition 4 – Annual Compliance certification and survey of heaters and boilers that are 75-2,000 MBTU/hr.</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring: Conditions 1-4: Facility has not installed any new heaters or boilers after December 21, 2000 that would be subject to these requirements.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: April 17 - December 31, 2014

<p>A. Attachment # or Permit Condition #: Section 8 – Attachment 74.11.1 (9/11/12)</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Large Water Heaters and Small Boilers</p> <p>Condition 1.a-b: Requirements for new small boilers and heaters (75-400 MBTU/hr) installed after January 1, 2013 but before January 1, 2014</p> <p>Condition 2.a-b: New units installed after January 1, 2014 which are ≥ 75 MBTU/hr and ≤ 400 MBTU/hr must meet specified NOx limits and be-certified in accordance with Rule 74.11.1.C.</p> <p>Condition 3 a-b: New units installed after January 1, 2013 ≥ 400 MBTU/hr and $< 1,000$ MBTU/hr must meet specified NOx limits and be certified in accordance with Rule 74.11.1.C.</p> <p>Condition 4 – Maintain a list-of manufacturer, brand name, model #, heat input rating, and installation date for each applicable unit. Submit upon request.</p> <p>Condition 5 - Certify annually and include a formal survey identifying each unit and documentation of certification status.</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring: Conditions 1-5: Facility does not presently utilize Heaters or Boilers that are rated at 75 – 1,000 MBTU/hr., thus facility is not subject to equipment certification, recordkeeping, and annual survey requirements</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1 - April 16, 2014

<p>A. Attachment # or Permit Condition #: Section 8 – Attachment 74.22</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Natural Gas-Fired Fan-Type Central Furnaces</p> <p>Condition 1.a-b: New fan type central furnaces require NOx < 40ng per Joule Output</p> <p>Condition 2: Maintain list of fan types with permit specified data</p> <p>Condition 3: Annual survey of fan furnaces</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring: Conditions 1–3: Facility has not installed nor does the site currently operate any natural gas-fired Fan-type Central Furnaces on site. Thus, the rule is not applicable at the facility.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: April 17 - December 31, 2014

<p>A. Attachment # or Permit Condition #: Section 8 – Attachment 74.22</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Natural Gas-Fired Fan-Type Central Furnaces</p> <p>Condition 1.a-b: New fan type central furnaces require NOx < 40ng per Joule Output</p> <p>Condition 2: Maintain list of fan types with permit specified data</p> <p>Condition 3: Annual survey of fan furnaces</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring: Conditions 1–3: Facility has not installed nor does the site currently operate any natural gas-fired Fan-type Central Furnaces on site. Thus, the rule is not applicable at the facility.</p>	<p>F. Currently in Compliance? YES</p>
	<p>G. Compliance Status: CONTINUOUS</p>
	<p>H. *Excursions, Exceedence, or other non-compliance: NO</p>

Permit Section: 9-11

General Requirements for Short-Term Activities (Attachments)

General Permit Conditions

Miscellaneous Federal Program Conditions



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1 - April 16, 2014

<p>A. Attachment # or Permit Condition #: Section 9 – Attachment 74.1</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Abrasive Blasting</p> <p>Condition 1.a-c: Abrasive Blasting shall be conducted indoors, using specified methods</p> <p>Condition 2.a-d: For Outdoor blasting use steel or iron shot/grit or utilize specified alternate methods</p> <p>Condition 3 – Adhere to Rule 74.1.B.2 requirements for pavement marking</p> <p>Condition 4 – Stucco and concrete blasting per Rule 74.1.B.3</p> <p>Condition 5 – Use California approved and labeled materials for abrasive blasting</p> <p>Condition 6 – Comply with visible emissions standard per rule 74.1.C.2</p> <p>Condition 7.a-e: Routine Surveillance and visual inspection of blasting operations. Surveillance to include permit specified recordkeeping.</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring: Conditions 1-7: No applicable Abrasive Blasting occurred in 2014</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: April 17 - December 31, 2014

<p>A. Attachment # or Permit Condition #: Section 9 – Attachment 74.1</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Abrasive Blasting</p> <p>Condition 1.a-c: Abrasive Blasting shall be conducted indoors, using specified methods</p> <p>Condition 2.a-d: For Outdoor blasting use steel or iron shot/grit or utilize specified alternate methods</p> <p>Condition 3 – Adhere to Rule 74.1.B.2 requirements for pavement marking</p> <p>Condition 4 – Stucco and concrete blasting per Rule 74.1.B.3</p> <p>Condition 5 – Use California approved and labeled materials for abrasive blasting</p> <p>Condition 6 – Comply with visible emissions standard per rule 74.1.C.2</p> <p>Condition 7.a-e: Routine Surveillance and visual inspection of blasting operations. Surveillance to include permit specified recordkeeping.</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring: Conditions 1-7: No applicable Abrasive Blasting occurred in 2014</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1 - April 16, 2014

<p>A. Attachment # or Permit Condition #: Section 9 – Attachment 74.2 (01/12/10)</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Architectural Coatings</p> <p>Condition 1.a-c: VOC Coating content limits, less water and exempt OC's, Flat <100 g/l; Nonflat <150 g/l; Nonflat High Gloss <250 g/l</p> <p>Condition 2 – Specialty coatings shall conform with Rule 74.2 Table of Standards. Industrial Maintenance <250 g/l less water & exempt OC's</p> <p>Condition 3 – Architectural coatings and cleaning materials to remain closed except when in use.</p> <p>Condition 4 – Adhere to Rule 74.2.B.1 thinning requirements</p> <p>Condition 5 – Routine Surveillance of architectural coating operations. Maintain VOC data on coatings used, and submit to district upon request</p> <p>Condition 6 – VOC content and other properties measured per procedures in Rule 74.2.G</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1, 2 – All paints used at facility are reviewed for compliance prior to approval for use.</p> <p>Condition 3 – Closure requirements are documented /training provided to all site personnel and contractors.</p> <p>Condition 4 – Paints are used as supplied by vendor.</p> <p>Condition 5 – Visual observations occur routinely. VOC data maintained for each coating via vendor supplied MSDS. Data will be furnished to District upon request.</p> <p>Condition 6 – Architectural coating properties determined using vendor supplied data.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: April 17 - December 31, 2014

<p>A. Attachment # or Permit Condition #: Section 9 – Attachment 74.2 (01/12/10)</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Architectural Coatings</p> <p>Condition 1.a-c: VOC Coating content limits, less water and exempt OC's, Flat <100 g/l; Nonflat <150 g/l; Nonflat High Gloss <250 g/l</p> <p>Condition 2 – Specialty coatings shall conform with Rule 74.2 Table of Standards. Industrial Maintenance <250 g/l less water & exempt OC's</p> <p>Condition 3 – Architectural coatings and cleaning materials to remain closed except when in use.</p> <p>Condition 4 – Adhere to Rule 74.2.B.1 thinning requirements</p> <p>Condition 5 – Routine Surveillance of architectural coating operations. Maintain VOC data on coatings used, and submit to district upon request</p> <p>Condition 6 – VOC content and other properties measured per procedures in Rule 74.2.G</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1, 2 – All paints used at facility are reviewed for compliance prior to approval for use.</p> <p>Condition 3 – Closure requirements are documented /training provided to all site personnel and contractors.</p> <p>Condition 4 – Paints are used as supplied by vendor.</p> <p>Condition 5 – Visual observations occur routinely. VOC data maintained for each coating via vendor supplied MSDS. Data will be furnished to District upon request.</p> <p>Condition 6 – Architectural coating properties determined using vendor supplied data.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1 - April 16, 2014

<p>A. Attachment # or Permit Condition #: Section 9 – Attachment 74.28</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Asphalt Roofing Operations</p> <p>Condition 1 – Kettles shall operate with lids. Lid will not be opened unless temperature is < 150oF</p> <p>Condition 2 – Max Temperatures: Asphalt < 500oF, Coal tar pitch < 400oF</p> <p>Condition 3 – Lid to remained closed, and receiving containers to be covered</p> <p>Condition 4 – Kettle vents to remain closed at all times</p> <p>Condition 5 – Facility will verify Rule 74.28 requirements met during projects</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring: Conditions 1-5: Internal administrative procedures. No applicable roofing occurred in 2014</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: April 17 - December 31, 2014

<p>A. Attachment # or Permit Condition #: Section 9 – Attachment 74.28</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Asphalt Roofing Operations</p> <p>Condition 1 – Kettles shall operate with lids. Lid will not be opened unless temperature is < 150oF</p> <p>Condition 2 – Max Temperatures: Asphalt < 500oF, Coal tar pitch < 400oF</p> <p>Condition 3 – Lid to remained closed, and receiving containers to be covered</p> <p>Condition 4 – Kettle vents to remain closed at all times</p> <p>Condition 5 – Facility will verify Rule 74.28 requirements met during projects</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring: Conditions 1-5: Internal administrative procedures. No applicable roofing occurred in 2014</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1 - April 16, 2014

<p>A. Attachment # or Permit Condition #: Section 9 - Attachment 40 CFR 61.M</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: National Emissions Standards for Asbestos Condition 1 – Comply with 40 CFR part 61, Subpart M Condition 2 – Adhere to 40 CFR part 61.145 requirements for Demolition and Renovation.</p>	<p>E. Source test reference method N/A</p>
<p>C. Method of monitoring: Condition 1 – Site Asbestos abatement program managed consistent with 40 CFR Part 61, Subpart M. State certified contractors are utilized for ACM demolition and renovation. Adherence with 40 CFR Part 61.145 is mandatory for job approval. Condition 2 – ACM demolition and renovation are observed by site resources to ensure compliance with 40 CFR Part 61.145. Activities involving ACM recorded are filed with Site Environmental Leader. Notification is provided to District prior to ACM renovation or demolition for activities requiring notification. No applicable activities occurred during 2014.</p>	<p>F. Currently in Compliance? YES G. Compliance Status: CONTINUOUS H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: April 17 - December 31, 2014

<p>A. Attachment # or Permit Condition #: Section 9 - Attachment 40 CFR 61.M</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: National Emissions Standards for Asbestos Condition 1 – Comply with 40 CFR part 61, Subpart M Condition 2 – Adhere to 40 CFR part 61.145 requirements for Demolition and Renovation.</p>	<p>E. Source test reference method N/A</p>
<p>C. Method of monitoring: Condition 1 – Site Asbestos abatement program managed consistent with 40 CFR Part 61, Subpart M. State certified contractors are utilized for ACM demolition and renovation. Adherence with 40 CFR Part 61.145 is mandatory for job approval. Condition 2 – ACM demolition and renovation are observed by site resources to ensure compliance with 40 CFR Part 61.145. Activities involving ACM recorded are filed with Site Environmental Leader. Notification is provided to District prior to ACM renovation or demolition for activities requiring notification. No applicable activities occurred during 2014.</p>	<p>F. Currently in Compliance? YES G. Compliance Status: CONTINUOUS H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1 - April 16, 2014

<p>A. Attachment # or Permit Condition #: Section 10 – District General Part 70 Permit Conditions</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: District General Part 70 Permit Conditions</p> <p>Condition 1 – Comply with all federally enforceable conditions, and all applicable requirements specified in the permit</p> <p>Condition 2 – Comply with new applicable requirements that become effective during the permit terms in a timely manner</p> <p>Condition 3 – Promptly report deviations within 4 hours of detection</p> <p>Condition 4 – The need to halt / reduce activity is not a defense against enforcement action</p> <p>Condition 5 – Retain all required records, monitoring data and support information for at least 5 years</p> <p>Condition 6 – Provide requested information to District in a timely manner</p> <p>Condition 7.a-d: Facilitate permit specified District inspection rights</p> <p>Condition 8 – Permit may be modified, revoked, reopened, reissued or terminated for cause</p> <p>Condition 9.a-d: Permit will be reopened per permit specified reasons</p> <p>Condition 10 – All fees shall be paid on timely basis</p> <p>Condition 11 – Permit does not convey property rights</p> <p>Condition 12 – One invalid term / condition does not invalidate the entire permit</p> <p>Condition 13 – Renewal application must be submitted between 6 to 18 months prior to expiration</p> <p>Condition 14 – Part 70 requires all applications, reports or other data that must be submitted per the Title V permit to be certified by the responsible official.</p> <p>Condition 15 – Annual Part 70 Compliance Certification</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1, All deviations from Title V requirements are reported as required.</p> <p>Condition 2, 4, 7-9, 11-12: Not applicable - Instructional conditions.</p> <p>Condition 3 – Internal administrative procedures.</p> <p>Condition 5 – Electronic databases and hard copy archives used for 5 year data retention</p> <p>Condition 6 – Reports submitted to district</p> <p>Condition 10 – Internal Administrative procedures. Records of payments exist.</p> <p>Condition 13 -15: Internal Administrative procedures</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: INTERMITTENT</p> <p>H. *Excursions, Exceedence, or other non-compliance: YES</p> <p>See Deviation</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: April 17 - December 31, 2014

<p>A. Attachment # or Permit Condition #: Section 10 – District General Part 70 Permit Conditions</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: District General Part 70 Permit Conditions</p> <p>Condition 1 – Comply with all federally enforceable conditions, and all applicable requirements specified in the permit</p> <p>Condition 2 – Comply with new applicable requirements that become effective during the permit terms in a timely manner</p> <p>Condition 3 – Promptly report deviations within 4 hours of detection</p> <p>Condition 4 – The need to halt / reduce activity is not a defense against enforcement action</p> <p>Condition 5 – Retain all required records, monitoring data and support information for at least 5 years</p> <p>Condition 6 – Provide requested information to District in a timely manner</p> <p>Condition 7.a-d: Facilitate permit specified District inspection rights</p> <p>Condition 8 – Permit may be modified, revoked, reopened, reissued or terminated for cause</p> <p>Condition 9.a-d: Permit will be reopened per permit specified reasons</p> <p>Condition 10 – All fees shall be paid on timely basis</p> <p>Condition 11 – Permit does not convey property rights</p> <p>Condition 12 – One invalid term / condition does not invalidate the entire permit</p> <p>Condition 13 – Renewal application must be submitted between 6 to 18 months prior to expiration</p> <p>Condition 14 – Part 70 requires all applications, reports or other data that must be submitted per the Title V permit to be certified by the responsible official.</p> <p>Condition 15 – Annual Part 70 Compliance Certification</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1, All deviations from Title V requirements are reported as required.</p> <p>Condition 2, 4, 7-9, 11-12: Not applicable - Instructional conditions.</p> <p>Condition 3 – Internal administrative procedures.</p> <p>Condition 5 – Electronic databases and hard copy archives used for 5 year data retention</p> <p>Condition 6 – Reports submitted to district</p> <p>Condition 10 – Internal Administrative procedures. Records of payments exist.</p> <p>Condition 13 -15: Internal Administrative procedures</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: INTERMITTENT</p> <p>H. *Excursions, Exceedence, or other non-compliance: YES</p> <p>See Deviation</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1 - April 16, 2014

<p>A. Attachment # or Permit Condition #: Section 10 – Attachment PO General</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: General Permit to Operate Conditions</p> <p>Condition 1 – Can petition Hearing Board within 30 days of receiving permit to alter conditions.</p> <p>Condition 2 – Post Permit reasonably close to equipment – Table 2 is sufficient if remainder of permit available elsewhere.</p> <p>Condition 3 – Permit is not transferable to another location.</p> <p>Condition 4 – Permit may be suspended if requested information is not furnished</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1 – Reference Information only.</p> <p>Condition 2 – Table 2 posted close to equipment and remainder of permit available electronically everywhere in plant.</p> <p>Condition 3 – Permit and sources are not transferred or located in alternate locations.</p> <p>Condition 4 – Information requested by District is furnished within requested time.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: April 17 - December 31, 2014

<p>A. Attachment # or Permit Condition #: Section 10 – Attachment PO General</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: General Permit to Operate Conditions</p> <p>Condition 1 – Can petition Hearing Board within 30 days of receiving permit to alter conditions.</p> <p>Condition 2 – Post Permit reasonably close to equipment – Table 2 is sufficient if remainder of permit available elsewhere.</p> <p>Condition 3 – Permit is not transferable to another location.</p> <p>Condition 4 – Permit may be suspended if requested information is not furnished</p>	<p>E. Source test reference method</p> <p>N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1 – Reference Information only.</p> <p>Condition 2 – Table 2 posted close to equipment and remainder of permit available electronically everywhere in plant.</p> <p>Condition 3 – Permit and sources are not transferred or located in alternate locations.</p> <p>Condition 4 – Information requested by District is furnished within requested time.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1 - April 16, 2014

A. Attachment # or Permit Condition #: Section 10 – Shield -40CFR 72-78 rev 391	D. Frequency of monitoring: Monthly
B. Description: Permit Shield – Acid Rain Reference Information Only	E. Source test reference method
C. Method of monitoring: Not Applicable - Reference Information only	F. Currently in Compliance? YES G. Compliance Status: CONTINUOUS H. *Excursions, Exceedence, or other non-compliance: NO

A. Attachment # or Permit Condition #: Section 10 – Shield 60KKKK	D. Frequency of monitoring: Monthly
B. Description: Permit Shield – Standards of Performance for Stationary Combustion Turbines Reference Information Only	E. Source test reference method N/A
C. Method of monitoring: Not Applicable - Reference Information only	F. Currently in Compliance? YES G. Compliance Status: CONTINUOUS H. *Excursions, Exceedence, or other non-compliance: NO

A. Attachment # or Permit Condition #: Section 10 – Shield 63YYYY	D. Frequency of monitoring: Monthly
B. Description: Permit Shield – NESHAPs Reference Information Only	E. Source test reference method
C. Method of monitoring: Not Applicable - Reference Information only	F. Currently in Compliance? YES G. Compliance Status: CONTINUOUS H. *Excursions, Exceedence, or other non-compliance: NO



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: April 17 - December 31, 2014

A. Attachment # or Permit Condition #: Section 10 – Shield -40CFR 72-78 rev 391	D. Frequency of monitoring: Monthly
B. Description: Permit Shield – Acid Rain Reference Information Only	E. Source test reference method
C. Method of monitoring: Not Applicable - Reference Information only	F. Currently in Compliance? YES G. Compliance Status: CONTINUOUS H. *Excursions, Exceedence, or other non-compliance: NO

A. Attachment # or Permit Condition #: Section 10 – Shield 60KKKK	D. Frequency of monitoring: Monthly
B. Description: Permit Shield – Standards of Performance for Stationary Combustion Turbines Reference Information Only	E. Source test reference method N/A
C. Method of monitoring: Not Applicable - Reference Information only	F. Currently in Compliance? YES G. Compliance Status: CONTINUOUS H. *Excursions, Exceedence, or other non-compliance: NO

A. Attachment # or Permit Condition #: Section 10 – Shield 63YYYY	D. Frequency of monitoring: Monthly
B. Description: Permit Shield – NESHAP For Reference Information Only	E. Source test reference method
C. Method of monitoring: Not Applicable - Reference Information only	F. Currently in Compliance? YES G. Compliance Status: CONTINUOUS H. *Excursions, Exceedence, or other non-compliance: NO



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: April 17 - December 31, 2014

<p>A. Attachment # or Permit Condition #: Section 10 – Shield 60 IIII</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Permit Shield – Stationary Compression Ignition Internal Combustion Engines Reference Information Only</p>	<p>E. Source test reference method</p>
<p>C. Method of monitoring: Not Applicable - Reference Information only</p>	<p>F. Currently in Compliance? YES G. Compliance Status: CONTINUOUS H. *Excursions, Exceedence, or other non-compliance: NO</p>

<p>A. Attachment # or Permit Condition #: Section 10 – Shield 63DDDDDD</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Permit Shield – NESHAP For Industrial, Commercial, and Institutional Boilers and Process Heaters Reference Information Only</p>	<p>E. Source test reference method N/A</p>
<p>C. Method of monitoring: Not Applicable - Reference Information only</p>	<p>F. Currently in Compliance? YES G. Compliance Status: CONTINUOUS H. *Excursions, Exceedence, or other non-compliance: NO</p>

<p>A. Attachment # or Permit Condition #: Section 10 – Shield 63JJJJJ</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Permit Shield – NESHAP For Industrial, Commercial, and Insitutional Boiler Area Sources Reference Information Only</p>	<p>E. Source test reference method</p>
<p>C. Method of monitoring: Not Applicable - Reference Information only</p>	<p>F. Currently in Compliance? YES G. Compliance Status: CONTINUOUS H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1 - April 16, 2014

<p>A. Attachment # or Permit Condition #: Section 11 – Attachment 40 CFR Part 68</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Accidental Release Prevention and Risk Management Plans Condition 1 – Should facility become subject to 40 CFR Part 68, then must submit Risk Management Plan and provide annual certification</p>	<p>E. Source test reference method N/A</p>
<p>C. Method of monitoring: Condition 1– Threshold Quantity calculations used to determine applicability of 40 CFR Part 68, in addition to administrative storage quantity restrictions.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: April 17 - December 31, 2014

<p>A. Attachment # or Permit Condition #: Section 11 – Attachment 40 CFR Part 68</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Accidental Release Prevention and Risk Management Plans Condition 1 – Should facility become subject to 40 CFR Part 68, then must submit Risk Management Plan and provide annual certification</p>	<p>E. Source test reference method N/A</p>
<p>C. Method of monitoring: Condition 1– Threshold Quantity calculations used to determine applicability of 40 CFR Part 68, in addition to administrative storage quantity restrictions.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1 - April 16, 2014

<p>A. Attachment # or Permit Condition #: Section 11 – Attachment 40 CFR Part 82</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Protection of Stratospheric Ozone Condition 1 – Subject to 40 CFR part 82, Subpart B if perform service on motor (fleet) vehicles Condition 2 – Subject to 40 CFR Part 82, Subpart F, if perform maintenance on, services, or dispose of appliances which use class I or class II substances as refrigerants</p>	<p>E. Source test reference method N/A</p>
<p>C. Method of monitoring: Condition 1– Facility does not maintain or otherwise service fleet vehicles at facility. Not subject to requirements specified in permit condition. Condition 2 – Internal administrative procedures to implement and manage applicable 40 CFR Part 82, Subpart F requirements.</p>	<p>F. Currently in Compliance? YES G. Compliance Status: CONTINUOUS H. *Excursions, Exceedence, or other non-compliance: NO</p>

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: April 17 - December 31, 2014

<p>A. Attachment # or Permit Condition #: Section 11 – Attachment 40 CFR Part 82</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Protection of Stratospheric Ozone Condition 1 – Subject to 40 CFR part 82, Subpart B if perform service on motor (fleet) vehicles Condition 2 – Subject to 40 CFR Part 82, Subpart F, if perform maintenance on, services, or dispose of appliances which use class I or class II substances as refrigerants</p>	<p>E. Source test reference method N/A</p>
<p>C. Method of monitoring: Condition 1– Facility does not maintain or otherwise service fleet vehicles at facility. Not subject to requirements specified in permit condition. Condition 2 – Internal administrative procedures to implement and manage applicable 40 CFR Part 82, Subpart F requirements.</p>	<p>F. Currently in Compliance? YES G. Compliance Status: CONTINUOUS H. *Excursions, Exceedence, or other non-compliance: NO</p>

Source Tests



Ventura County Air
Pollution Control
District

ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: January 1, 2014- April 16, 2014

A. Emission Unit Description: B-301 Boiler			B. Pollutant NOx
C. Measured Emission Rate: 27.30 ppm @3% O2	D. Limited Emission Rate: 40 ppm @ 3% O2	E. Specific Source Test: P27-062-FR-B301	F. Test Date 3/13/2014

A. Emission Unit Description: B-301 Boiler			B. Pollutant CO
C. Measured Emission Rate: 66.60 ppm @ 3% O2	D. Limited Emission Rate: 400 ppm @ 3% O2	E. Specific Source Test: P27-062-FR-B301	F. Test Date 3/13/2014



Ventura County Air
Pollution Control
District

ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: January 1, 2014- April 16, 2014

A. Emission Unit Description: LM6000 Turbine			B. Pollutant NOx
C. Measured Emission Rate: 2.33 ppm @ 15% O2	D. Limited Emission Rate: 2.5 ppm @ 15% O2	E. Specific Source Test: P27-062-FR-COMP	F. Test Date 3/10/2014

A. Emission Unit Description: LM6000 Turbine			B. Pollutant CO
C. Measured Emission Rate: 6.46 lb/hour	D. Limited Emission Rate: 10.20 lb/hour	E. Specific Source Test: P27-060-FR COMP	F. Test Date 3/10/2014

A. Emission Unit Description: LM6000 Turbine			B. Pollutant O2
C. Measured Emission Rate: 14.63 %	D. Limited Emission Rate: N/A	E. Specific Source Test: P27-062-FR-COMP	F. Test Date 3/10/2014

A. Emission Unit Description: LM6000 Turbine			B. Pollutant Heat Rate
C. Measured Emission Rate: 430.90 MMBtu/hour	D. Limited Emission Rate: N/A	E. Specific Source Test: P27-062-FR-COMP	F. Test Date 3/10/2014

A. Emission Unit Description: LM6000 Turbine			B. Pollutant NH3
C. Measured Emission Rate: 0.98 ppm @ 15% O2	D. Limited Emission Rate: 20 ppm @ 15% O2	E. Specific Source Test: P27-062-FR-COMP	F. Test Date 3/10/2014

A. Emission Unit Description: LM6000 Turbine			B. Pollutant ROC
C. Measured Emission Rate: <.033 ppm @ 3% O2	D. Limited Emission Rate: 2.0 ppm @ 3% O2	E. Specific Source Test: P27-062-FR-COMP	F. Test Date 3/10/2014



Ventura County Air
Pollution Control
District

ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: April 17, 2014- December 31, 2014

A. Emission Unit Description: LM2500 Turbine			B. Pollutant NOx
C. Measured Emission Rate: 20.70 ppm @ 15% O2	D. Limited Emission Rate: 24 ppm @ 15% O2	E. Specific Source Test: P27-062-FRB-COMP	F. Test Date 5/12/2014

A. Emission Unit Description: LM2500Turbine			B. Pollutant CO
C. Measured Emission Rate: 19.50 lb/hour	D. Limited Emission Rate: 180.13 lb/hour	E. Specific Source Test: P27-062-FRB-COMP	F. Test Date 5/12/2014

A. Emission Unit Description: LM2500 Turbine			B. Pollutant O2
C. Measured Emission Rate: 14.30 %	D. Limited Emission Rate: N/A	E. Specific Source Test: P27-062-FRB-COMP	F. Test Date 5/12/2014

A. Emission Unit Description: LM2500 Turbine			B. Pollutant Heat Rate
C. Measured Emission Rate: 236.00 MMbtu/hour	D. Limited Emission Rate: N/A	E. Specific Source Test: P27-062-FRB-COMP	F. Test Date 5/12/2014



ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: April 17, 2014- December 31, 2014

A. Emission Unit Description: 2X Predryer Hot Air Furnace (70 Mmbtu/hour)			B. Pollutant NOx
C. Measured Emission Rate: 0.0135 lb/Mmbtu	D. Limited Emission Rate: 0.080 lb/Mmbtu	E. Specific Source Test: P27-055-FR	F. Test Date 9/26/2012

A. Emission Unit Description: 2X Predryer Hot Air Furnace (70 Mmbtu/hour)			B. Pollutant CO
C. Measured Emission Rate: 0.0157 lb/Mmbtu	D. Limited Emission Rate: 0.045 lb/Mmbtu	E. Specific Source Test: P27-055-FR	F. Test Date 9/26/2012

A. Emission Unit Description: 2X Predryer Hot Air Furnace (70 Mmbtu/hour)			B. Pollutant O2
C. Measured Emission Rate: 14.91 %	D. Limited Emission Rate: N/A	E. Specific Source Test: P27-055-FR	F. Test Date 9/26/2012

A. Emission Unit Description: 2X Yankee Hot Air Furnace (40 Mmbtu/hour)			B. Pollutant NOx
C. Measured Emission Rate: 0.0117 lb/Mmbtu	D. Limited Emission Rate: 0.080 lb/Mmbtu	E. Specific Source Test: P27-062-FR	F. Test Date 9/10/2014

A. Emission Unit Description: 2X Yankee Hot Air Furnace (40 Mmbtu/hour)			B. Pollutant CO
C. Measured Emission Rate: 0.013 lb/Mmbtu	D. Limited Emission Rate: 0.045 lb/Mmbtu	E. Specific Source Test: P27-062-FR	F. Test Date 9/10/2014

A. Emission Unit Description: 2X Yankee Hot Air Furnace (40 Mmbtu/hour)			B. Pollutant O2
C. Measured Emission Rate: 14.35 %	D. Limited Emission Rate: N/A	E. Specific Source Test: P27-062-FR	F. Test Date 9/10/2014

Deviations



DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 01/01/2014 to 12/31/2014

A. Attachment # or Permit Condition #: Attachment STRMLN15LM6000- NOx, rev291, Condition 1 / Rule 103 B.1	B. Equipment description: 49.9 MW GE Natural Gas Cogeneration Turbine LM-6000	C. Deviation Period: Date: 4/27/2014 Time Begin: 05:58 Time End: 06:18 When Discovered: Date: 4/28/2014 Time: 07:08
D. Parameters monitored: NOx 3 hour average ppmvd @ 15% O2	E. Limit: 2.5 ppmvd @ 15% O2	F. Actual: < 3.5 ppmvd @ 15% O2 for three 3 hour averages
G. Probable Cause of Deviation After the automatic calibration sequence, the CEMS unit was not placed in the Outlet mode which prevented the NH3 injection system from controlling NOx emissions properly.		H. Corrective actions taken: CEMS was placed in Outlet mode eight minutes later and NOx emissions stabilized and returned to below permit limits within the next ten minutes. Additional incident analysis and corrective action information was provided in our letter to the District, dated May 16, 2014.

A. Attachment # or Permit Condition #: Section 10 – District General Part 70 Permit Conditions, Condition 10	B. Equipment description: Administrative item – delay of District fees. Source Test Observation Fee – paid on 08/21 rather than invoice date of 7/14.	C. Deviation Period: Date: See Section B Time Begin: Time End: When Discovered: Date: Time:
D. Parameters monitored: N/A	E. Limit: N/A	F. Actual: N/A
G. Probable Cause of Deviation Administrative delay		H. Corrective actions taken: Payments were promptly submitted as described above. Internal administrative procedures were updated to prevent recurrence.



DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 01/01/2014 to 12/31/2014

A. Attachment # or Permit Condition #: Section 10 – District General Part 70 Permit Conditions, Condition 1 Comply with all federally enforceable conditions and applicable requirements.	B. Equipment description: See deviations listed above for the reporting period.	C. Deviation Period: Date: See above deviation summaries. Time Begin: Time End: When Discovered: Date: Time:
D. Parameters monitored: See above deviation summaries.	E. Limit: See above deviation summaries.	F. Actual: See above deviation summaries.
G. Probable Cause of Deviation See above deviation summaries.		H. Corrective actions taken: See above deviation summaries.



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

February 12, 2015

Mr. Dan Searcy
Compliance Division, Manager
Ventura County APCD
669 County Square Drive
Ventura, California 93003

Subject: Additional Documents in Support of Part 70 Compliance Certification for Report Year 2014

Mr. Searcy:

Enclosed are additional documents in support of The Procter & Gamble Paper Products Company's Oxnard facility, Part 70 Permit No. 00015 Compliance Certification for the January 1, 2014 through December 31, 2014 reporting period. If you have any questions concerning these documents or would like supplemental information not included with submission, please contact me at your earliest convenience.

I can be reached at 805-485-8871, x3103 or green.km@pg.com should you have any questions about this certification.

Respectfully,

Ms. Kathleen Green
Site Environmental Leader

Cc: Mr. Gerardo Rios, Permits, Chief, US EPA Region IX
Ms. Kara Roeder, Plant Manager, P&G
Mr. Mario Aguilar, Site HS&E Manager, P&G
Ms. Chris Cote

15 FEB 13 AM 4:43
A.P.O.U.

Monthly Throughput
 P000015, Section 7, Attachment P000015PCI (see Section 3)

Month	Combustion						Papermaking						Converting						Month	Facility Wide Total Emissions					
	ROC (tons)	NOx (tons)	PM (tons)	SOx (tons)	CO (tons)	NH3 (tons)	ROC (tons)	NOx (tons)	PM (tons)	SOx (tons)	CO (tons)	NH3 (tons)	ROC (tons)	NOx (tons)	PM (tons)	SOx (tons)	CO (tons)	NH3 (tons)		ROC (tons)	NOx (tons)	PM (tons)	SOx (tons)	CO (tons)	NH3 (tons)
Jan-14	1.27	8.95	1.49	0.15	9.65	0.61	3.51	--	--	--	--	--	0.33	--	--	--	--	--	5.12	8.95	1.49	0.15	9.65	0.61	
Feb-14	1.21	8.93	1.46	0.13	9.59	0.43	3.05	--	--	--	--	--	0.27	--	--	--	--	--	4.53	8.93	1.46	0.13	9.59	0.43	
Mar-14	1.32	9.51	1.56	0.15	9.70	0.54	2.98	--	--	--	--	--	0.28	--	--	--	--	--	4.59	9.51	1.56	0.15	9.70	0.54	
Apr-14	1.26	8.65	1.48	0.15	8.27	0.70	3.49	--	--	--	--	--	0.24	--	--	--	--	--	5.00	8.65	1.48	0.15	8.27	0.70	
May-14	1.18	7.60	1.37	0.14	7.68	0.54	2.42	--	--	--	--	--	0.14	--	--	--	--	--	3.73	7.60	1.37	0.14	7.68	0.54	
Jun-14	1.27	8.25	1.47	0.15	8.33	0.55	3.95	--	--	--	--	--	0.32	--	--	--	--	--	5.54	8.25	1.47	0.15	8.33	0.55	
Jul-14	1.29	8.03	1.49	0.15	7.64	0.57	3.55	--	--	--	--	--	0.27	--	--	--	--	--	5.12	8.03	1.49	0.15	7.64	0.57	
Aug-14	1.25	7.98	1.44	0.15	7.45	0.58	2.64	--	--	--	--	--	0.40	--	--	--	--	--	4.29	7.98	1.44	0.15	7.45	0.58	
Sep-14	1.24	7.57	1.42	0.14	7.04	0.55	3.15	--	--	--	--	--	0.38	--	--	--	--	--	4.76	7.57	1.42	0.14	7.04	0.55	
Oct-14	0.86	6.51	0.93	0.12	6.17	0.48	2.44	--	--	--	--	--	0.23	--	--	--	--	--	3.53	6.51	0.93	0.12	6.17	0.48	
Nov-14	1.13	8.40	1.26	0.14	8.16	0.47	2.88	--	--	--	--	--	0.16	--	--	--	--	--	4.19	8.40	1.26	0.14	8.16	0.47	
Dec-14	1.34	10.39	1.51	0.15	9.33	0.48	3.33	--	--	--	--	--	0.28	--	--	--	--	--	4.95	10.39	1.51	0.15	9.33	0.48	
12 Mo Total Tons	14.6	100.8	16.9	1.7	99.0	6.5	37.4						3.3						55.3	100.8	16.9	1.7	99.0	6.5	
																				16.82	132.88	68.3	2.03	284.93	54.19

The Procter & Gamble Paper Products Company -- Oxnard Plant

Current Actual in Tons versus Permit Limit

Permit Limit

NOTE: Usage between April 2013 and February 2014 is on Rental Boiler.

Fuel Usage	B301 (MMSCF)
Jan-14	0.50
Feb-14	6.43
Mar-14	3.10
Apr-14	1.13
May-14	0.82
Jun-14	0.23
Jul-14	0.06
Aug-14	0.52
Sep-14	0.14
Oct-14	7.89
Nov-14	7.82
Dec-14	1.56
12 Month Total	30.18

Annual Heat Input (AHI):

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

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

AHI = 30.1830354416511 * 1050

AHI = 31,692 MMBTU

Maximum Potential Heat Input (MPHI)

Capacity Factor (CF)

Rated Firing Capacity (RFC): 100 MMBTU/hr

Capacity Factor = Ratio of Annual Actual Heat Input to

Maximum Potential Heat Input

Maximum Potential Operating Hours (MPOH): 8760 hrs

CF = AHI / MPHI

MPHI = RFC * MPOH

CF = 0.0361783 Ratio

MPHI = 876,000 MMBTU

% CF = 3.6% (%CF)

30% of MPHI (Maximum Allowable): 262800 MMBTU

Maximum Allowable Rolling 12 month Fuel Usage: 250.29 MMSCF

**EMERGENCY DIESEL ENGINE
2014 ANNUAL REPORT FORM**

Reporting Period: January 1 through December 31, 2014

Report Due Date: February 15, 2014

Your APCD Permit to Operate requires your facility to submit reports of the annual hours of operation and/or maintenance and testing, and emergency use for each diesel emergency engine. If the annual operating hours, excluding emergency operation, exceed the specified annual permit limit, please include an explanation. Please Note: California Health and Safety Code 42304 requires the holder of an APCD Permit to Operate to furnish the information requested by the APCD within a reasonable time or the APCD may suspend the Permit to Operate.

Facility Name:	Procter & Gamble Paper Products	Permit No: 00015	
Facility Address:	800 North Rice Avenue	Facility Contact: Mario Aguilar	
City:	Oxnard, CA 93030	Phone: 805-484-8871 X 8966	
420 BHP	<p>Caterpillar Diesel-Fired Emergency Standby Engine, Model 3406, Serial No 61808444, ID: Utility Yard Pump #2, used for fire suppression Caterpillar Diesel-Fired Emergency Standby Engine, Model 3406, Serial No 61808444, ID: Utility Yard Pump, PG-2, used for fire suppression</p>		
Are the details listed above correct? If no, please make corrections.		Yes	No X
Reporting Requirements for Calendar 2014			
	Date of Reading		Meter Reading
First of 2014:	01/06/2014	First of 2014:	651.3
End of 2014:	01/07/2015	End of 2014:	678.2
Total annual hours for: Maintenance & Testing:			23.8
Hours of Emergency use:			3.2
Total Hours of operation:			27.0
Has the engine listed above exceeded the permit limit for maintenance and testing? NO If yes, please explain here or attach additional pages:			
Signature of person supplying the information: "I certify that the above information is correct."			
Signature:	<i>Kara Roeder</i>	Title: Plant Manager	
Print Name:	Kara Roeder	Date: <i>2/12/15</i>	
Phone #:	805 485-8871 X 8924	Email: roeder.kc@pg.com	
Send report to:	Barry Mamaghany or Ms. Chris Cote Ventura County Air Pollution Control	Barry: (805) 645-1446 barry@vcapcd.org	
District	669 County Square Drive, Second Floor Ventura, CA 93003	Chris: (805) 645-1442 chrisc@vcapcd.org	
		Fax: (805) 645-1444	
		Form#: 00015-50	

**EMERGENCY DIESEL ENGINE
2014 ANNUAL REPORT FORM**

Reporting Period: January 1 through December 31, 2014

Report Due Date: February 15, 2014

Your APCD Permit to Operate requires your facility to submit reports of the annual hours of operation and/or maintenance and testing, and emergency use for each diesel emergency engine. If the annual operating hours, excluding emergency operation, exceed the specified annual permit limit, please include an explanation. Please Note: California Health and Safety Code 42304 requires the holder of an APCD Permit to Operate to furnish the information requested by the APCD within a reasonable time or the APCD may suspend the Permit to Operate.

Facility Name:	Procter & Gamble Paper Products	Permit No: 00015	
Facility Address:	800 North Rice Avenue	Facility Contact: Mario Aguilar	
City:	Oxnard, CA 93030	Phone: 805-484-8871 X 8966	
420 BHP	Caterpillar Diesel-Fired Emergency Standby Engine, Model 3406, ID: Utility Yard Pump #3, used for fire suppression Caterpillar Diesel-Fired Emergency Standby Engine, Model 3406, Serial No 6TB10913, ID: Utility Yard Pump, PG-3, used for fire suppression		
Are the details listed above correct? If no, please make corrections.		Yes	No X
Reporting Requirements for Calendar 2014			
	Date of Reading		Meter Reading
First of 2014:	01/06/2014	First of 2014:	693.9
End of 2014:	01/07/2015	End of 2014:	719.0
Total annual hours for: Maintenance & Testing:			23.3
Hours of Emergency use:			1.8
Total Hours of operation:			25.1
Has the engine listed above exceeded the permit limit for maintenance and testing? NO If yes, please explain here or attach additional pages:			
Signature of person supplying the information: "I certify that the above information is correct."			
Signature:	<i>Kara Roeder</i>	Title: Plant Manager	
Print Name: Kara Roeder		Date: <i>2/12/15</i>	
Phone #: 805 485-8871 X 8924		Email: roeder.kc@pg.com	
Send report to: Barry Mamaghany or Ms. Chris Cote Ventura County Air Pollution Control		Barry: (805) 645-1446 barry@vcapcd.org	
District		Chris: (805) 645-1442 chrisc@vcapcd.org	
Floor	669 County Square Drive, Second	Fax: (805) 645-1444	
	Ventura, CA 93003	Form#: 00015-50	

**EMERGENCY DIESEL ENGINE
2014 ANNUAL REPORT FORM**

Reporting Period: January 1 through December 31, 2014
Report Due Date: February 15, 2015

Your APCD Permit to Operate requires your facility to submit reports of the annual hours of operation and/or maintenance and testing, and emergency use for each diesel emergency engine. If the annual operating hours, excluding emergency operation, exceed the specified annual permit limit, please include an explanation. Please Note: California Health and Safety Code 42304 requires the holder of an APCD Permit To Operate to furnish the information requested by the APCD within a reasonable time or the APCD may suspend the Permit to Operate.

Facility Name:	Procter & Gamble Paper Products	Permit No: 00015	
Facility Address:	800 North Rice Avenue	Facility Contact: Mario Aguilar	
City:	Oxnard, CA 93030	Phone: 805-484-8871 X 8966	
210 BHP	Clarke Detroit Diesel Allison, Inc. Diesel-Fired Emergency Engine, Model JU6HUF50, Serial No. PE6068T185639, I.D: Warehouse Pump #2, used for fire suppression. Clarke Detroit Diesel Allison, Inc. Diesel-Fired Emergency Engine, Model JU6HUF50, Serial No. PE6068T185639, I.D: Warehouse Pump, PG-4, used for fire suppression.		
Are the details listed above correct? If no, please make corrections.		Yes	No <input checked="" type="checkbox"/>
Reporting Requirements for Calendar 2014			
	Date of Reading		Meter Reading
First of 2014:	01/06/2014	First of 2014:	258.6
End of 2014:	01/07/2015	End of 2014:	284.4
Total annual hours for: Maintenance & Testing:			25.8
Hours of Emergency use:			0
Total Hours of operation:			25.8
Has the engine listed above exceeded the permit limit for maintenance and testing? NO If yes, please explain here or attach additional pages:			
Signature of person supplying the information: "I certify that the above information is correct."			
Signature: <i>Kara Roeder</i>		Title: Plant Manager	
Print Name: Kara Roeder		Date: <i>2/12/15</i>	
Phone #: 805 485-8871 X 8924		Email: roeder.kc@pg.com	
Send report to: Barry Mamaghany or Ms. Chris Cote Ventura County Air Pollution Control		Barry: (805) 645-1446 barry@vcapcd.org	
District		Chris: (805) 645-1442 chrisc@vcapcd.org	
669 County Square Drive, Second		Fax: (805) 645-1444	
Floor		Form#: 00015-50	
Ventura, CA 93003			

**EMERGENCY DIESEL ENGINE
2014 ANNUAL REPORT FORM**

Reporting Period: January 1 through December 31, 2014

Report Due Date: February 15, 2014

Your APCD Permit to Operate requires your facility to submit reports of the annual hours of operation and/or maintenance and testing, and emergency use for each diesel emergency engine. If the annual operating hours, excluding emergency operation, exceed the specified annual permit limit, please include an explanation. Please Note: California Health and Safety Code 42304 requires the holder of an APCD Permit to Operate to furnish the information requested by the APCD within a reasonable time or the APCD may suspend the Permit to Operate.

Facility Name:	Procter & Gamble Paper Products	Permit No: 00015	
Facility Address:	800 North Rice Avenue	Facility Contact: Mario Aguilar	
City:	Oxnard, CA 93030	Phone: 805-484-8871 X 8966	
210 BHP	Clarke Detroit Diesel Allison, Inc. Diesel-Fired Emergency Engine, Model JU6HUF50 L1211H, Serial No. PE6068T157094, I.D: Warehouse Pump #2, used for fire suppression. Clarke Detroit Diesel Allison, Inc. Diesel-Fired Emergency Engine, Model JU6HUF50 L1211H, Serial No. PE6068T157094, I.D: Warehouse Pump, PG-5, used for fire suppression.		
Are the details listed above correct? If no, please make corrections.		Yes	X
Reporting Requirements for Calendar 2014			
	Date of Reading		Meter Reading
First of 2014:	01/06/2014	First of 2014:	271.0
End of 2014:	01/07/2015	End of 2014:	294.7
Total annual hours for: Maintenance & Testing:			23.7
Hours of Emergency use:			0
Total Hours of operation:			23.7
Has the engine listed above exceeded the permit limit for maintenance and testing? NO If yes, please explain here or attach additional pages:			
Signature of person supplying the information: "I certify that the above information is correct."			
Signature: <i>Kara Roeder</i>		Title: Plant Manager	
Print Name: Kara Roeder		Date: <i>2/12/15</i>	
Phone #: 805 485-8871 X 8924		Email: roeder.kc@pg.com	
Send report to: Barry Mamaghany or Ms. Chris Cote Ventura County Air Pollution Control		Barry: (805) 645-1446 barry@vcapcd.org	
District		Chris: (805) 645-1442 chrisc@vcapcd.org	
669 County Square Drive, Second		Fax: (805) 645-1444	
Floor		Form#: 00015-50	
Ventura, CA 93003			

Opacity Annual Formal Survey
Procter & Gamble Oxnard Plant

VCAPCD Part 7D Permit, Attachment 50 Compliance Document

Conducted On Date: 7/23/14 Time: 16:30
 Conducted By: Kathleen Green Signature: Kathleen Green
 Visible Emissions Certification #: 19390
 Most Recent Certification Date: 7/22/14

Permit Emission Points
Drawing - PG-3419820

Stack	Stack Hgt (ft)	Stack Dia (sq ft)	Emissions Unit	Emission Description	Stack Position	Visible Emissions other than Uncombined Water N - if there are no visible emissions for ≥ 3minutes Y - if there are visible emissions > 20% or No. 1 Ringelmann for ≥ 3minutes
S-1	62	2.10	Washer Wet Lapper	PM	When Fan motor on	N
S-2	84	12.67	Cogen 2/LM6000 Turbine	Thermal Output with NOx, CO, SOx, PM, ROC, NH3	Damper closed when 2X is running	N
S-3	27	4.40	B-301 Steam Boiler	Thermal Output with NOx, CO, SOx, PM, ROC	FGR closed during SU (2hr) only - 100% Exhaust - otherwise partial exhaust	N
Stack S-4 is not a physical stack but represents the totals stacks from 1X process stacks 4A-4E						
S-4A	56	4.72	1X PreDryer	Thermal Output with NOx, CO, SOx, PM, ROC MAF + Burners OR Cogen + Burners	Open when 1X running	N
S-4B	-	-	Furnace Cooling	Hot Air Release from shell cooling	Open	N
S-4C	-	-	HRB	Thermal Output, NOx, CO, SOx, PM, ROC	Normally Closed	N
S-4D	50	9.63	Cogen 1/LM2500 Turbine	Thermal Output, NOx, CO, SOx, PM, ROC	Damper closed when 1X running	N
S-4E	-	-	W/WL Brake Pulver vent	PM	Open vent	N
S-5	-	-	1X Scrubber	PM	When Fan motor on	N
S-6	-	-	2X Scrubber	PM	When Fan motor on	N
Stack S-7 is not physical stack but represents the totals stacks from 2X NOTE - PreDryer Exhaust is the emission from the YHAF (after drying)						
S-7A	74	12.22	1X PreDryer Exhaust (YHAF Stack)	Thermal Output with NOx, CO, SOx, PM, ROC, NH3 LM6000 + MAF + PD	Normally Open	N
S-7B	-	-	Exhaust Diversion (PDF Stack)	Thermal Output with NOx, CO, SOx, PM, ROC, NH3	Normally Closed	N
S-7C	-	-	2X Vacuum Stack	PM	Open Vent	N
S-7D	-	-	2X Wet End (Former)	PM	Open Vent	N
S-7E	-	-	2X Brake Pulver Vent	PM	Open Vent	N
2			Fire Pump #2	CARB Fuel Combustion	Open vent	N/A - Not Running
3			Fire Pump #3	CARB Fuel Combustion	Open vent	N/A " "
4			Fire Pump #4	CARB Fuel Combustion	Open vent	N/A " "
5			Fire Pump #5	CARB Fuel Combustion	Open vent	N/A " "

Any Other Visible Emissions? _____

Atmospheric Conditions: Warm, gusty winds from West (10 mph)



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

February 12, 2015

Dan Searcy
Enforcement Manager
Ventura County APCD
669 County Square Drive
Ventura, California 93003

Subject: Semi Annual Report - Permit to Operate No. 0015
Excursion Report for 1X, and 2X Paper Machine Dry End Scrubbers
Report Period: 7/1/14- 12/31/14

Mr. Searcy:

Pursuant to Section 7, Attachment PO00015PC5, Condition 3.e this report satisfies our semi annual reporting requirement to report excursions for our 1X, and 2X Dry End scrubbers.

If you have any questions, please contact me, at (805) 485-8871 x3103 or green.km@pg.com.

Respectfully,

Kathleen Green
Site Environmental Leader

cc: Mr. Gerardo Rios, Permits, Chief, US EPA Region IX
Mr. Lyle Olson – VC APCD
Mr. Mario Aguilar – HSE Manager, P&G
Ms. Kara Roeder – Plant Manager, P&G

15 FEB 13 AM 4:43
A.P.C.D.



Ventura County
Air Pollution
Control District

RESPONSIBLE OFFICIAL'S CERTIFICATION FORM

Ventura County APCD Rule 33.9 requires that "any document, including reports, schedule of compliance progress reports and compliance certifications, required by a Part 70 permit shall be certified by a responsible official." Therefore, this form shall be signed by the company's Responsible Official and submitted with all such reports, including, but not limited to semi-annual reports, deviation and emergency reports and any periodic reports required by a Part 70 permit. However, when submitting your Annual Compliance Certifications, please use the form titled Annual Compliance Certification Signature Cover Form.

Semi-annual reports, deviations and emergency reports and any periodic reports required by your Part 70 permit should be submitted to:

Lyle Olson
Air Quality Engineer
Ventura County Air Pollution Control District
669 County Square Drive
Ventura, CA 93003

Certification by Responsible Official

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

Signature and Title of Responsible Official:	Date:
Signature: <u>Kara Foeder</u>	<u>2/12/15</u>
Title: <u>P+G Oxnard Plant Manager</u>	

Ventura County Air Pollution Control District
Part 70 - Semi Annual Scrubber Excursion Report

Facility:	The Procter & Gamble Paper Products Company – Oxnard, CA
Permit No.:	00015

Report Period:	July 1 st , 2014 – December 31 st , 2014
Subject Units:	(2) - 1X Paper Machine, and 2X Paper Machine, Dry End Scrubbers

Total Number of Excursions:	0
Total Duration of Excursions:	0

Excursion Details –

Date	Duration	Detail	Cause/Corrective Action
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The report above satisfies requirements identified in our facility Part 70 Permit, Attachment PO00015PC5, Condition 3.e.



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

February 12, 2015

Dan Searcy
Enforcement Manager
Ventura County APCD
669 County Square Drive
Ventura, California 93003

Subject: Semi Annual Report - Permit to Operate No. 0015
Actual Annual Operating Hours for LM2500 and LM6000 Turbines
Report Period: 1/1/14– 12/31/14

Mr. Searcy:

This report satisfies our streamlined semi annual reporting requirement for our LM6000 turbine per Attachment STRMLN15LM6000-NOx-rev291, Condition 14.a-b, and for our LM2500 turbine per Attachment STRMLN15LM2500-NOx, CO-rev351, Condition 11.a-b. It covers actual annual operating hours for both turbines, and summarizes the results from the most recent respective annual source test.

Source test results for each turbine were within the prescribed compliance limits for all tested emissions.

Additionally, per Section 10, District General Part 70 Permit Conditions, Condition 14, a Responsible Official Certification is attached to these reports.

If you have any questions, please contact me at (805) 485-8871 x3103 or green.km@pg.com.

Respectfully,


Kathleen Green
Site Environmental Leader

cc: Mr. G. Rios – US EPA - Region IX
Mr. Lyle Olson – VC APCD
Mr. Mario Aguilar – Site HS&E Leader -P&G
Ms. Kara Roeder, Plant Manager – P&G

APCD
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Ventura County
Air Pollution
Control District

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669 County Square Drive
Ventura, CA 93003

Certification by Responsible Official

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

Signature and Title of Responsible Official:	Date:
Signature: <u>Kara Foeder</u>	<u>2/12/15</u>
Title: <u>P+G Oxnard Plant Manager</u>	

REPORT #1 – LM-2500
Operating Hours and Source Test Results

SUMMARY REPORT
ANNUAL OPERATING HOURS AND SOURCE TEST RESULTS

Reporting Period Dates: From 1/1/14 through 12/31/14

Company: The Procter & Gamble Paper Products Company
Address: 800 North Rice Avenue, Oxnard, CA 93030

Certification or Audit: May 12, 2014 (Annual Source Test)
Process Unit Description: LM-2500 Gas Turbine (Cogen I)

Total Source Operating
Time in Reporting Period: 7809.73

SOURCE TEST SUMMARY

Pollutant	Measured Emissions	Permit Limit
Oxides of Nitrogen, ppm @ 15% O ₂	20.70	24
Carbon Monoxide, lb/hr	19.50	54.98

Refer to Horizon Test report # P27-062-FRB COMP for additional details.

REPORT #2 – LM-6000
Operating Hours and Source Test Results

SUMMARY REPORT
ANNUAL OPERATING HOURS AND SOURCE TEST RESULTS

Reporting Period Dates: From 1/1/14 through 12/31/14

Company: The Procter & Gamble Paper Products Company
Address: 800 North Rice Avenue, Oxnard, CA 93030

Certification or Audit: March 10, 2014 (Annual Source Test)
Process Unit Description: LM-6000 Gas Turbine (Cogen II)

Total Source Operating
Time in Reporting Period: 8478.97

SOURCE TEST SUMMARY

Pollutant	Measured Emissions	Permit Limit
Oxides of Nitrogen, ppm @ 15% O ₂	2.33	2.5
Carbon Monoxide, lb/hour	6.46	10.20
Reactive Organic Compounds, ppm @ 15%	< 0.33	2.0
Ammonia, ppm @ 15% O ₂	0.98	20

Please refer to Horizon Test report # P27-062-FR COMP for additional details.