

# NEW WINDY CONTAINERBOARD

May 2, 2014

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

Re: New-Indy Oxnard, LLC  
2013-2014 Annual Title V Certification Package (PTO 0157)

Dear Mr. Searcy:

Enclosed, please find a binder containing the 2013-2014 Title V Certification Forms and related documentation for the New-Indy Oxnard facility. The supporting documentation is included after the last APCD form.

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

Respectfully submitted,



Rudy Rehbein  
Mill Manager

enc: 2013-2014 Annual Title V Compliance Certification Binder

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NEW INDY OXNARD, LLC

5936 PERKINS ROAD • OXNARD, CALIFORNIA 93033 • WWW.NEWINDYCONTAINERBOARD.COM  
PHONE (805) 986-3881 • FAX (805) 488-5186



## 2013 – 2014 TITLE V COMPLIANCE CERTIFICATION

**New-Indy Oxnard, LLC**  
5936 Perkins Road  
Oxnard, California

May 1, 2014

Prepared for: New-Indy Oxnard, LLC  
P.O. Box 519  
Pt. Hueneme, California 93044

Prepared by: Sespe Consulting, Inc.  
468 Poli Street, Suite 2E  
Ventura, California 93001  
(805) 275-1515

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- Section 1      Signature Cover Form
- Section 2      Deviation Summary Forms
- Section 3      Source Test Summary Forms
- Section 4      Permit Attachment Forms

Requirement ID	Description
6.a. 74.15N3-0157	Boilers, Steam Generators, and Process Heaters – Exemption for Emergency Standby Units.
6.b. 103N5-0157	Stack Monitoring
6.c. STRMLN157- NOx, CO, NH3	Gas Turbine Based Cogeneration Unit; NOx, CO, and NH3 Applicable Requirements – NOx Streamlined.
6.d. STRMLN157-SOx	Gas Turbine Based Cogeneration Unit; SOx Applicable Requirements – Streamlined.
New Requirement	Mandatory GHG Reporting (40CFR 98)
New Requirement	Adhesives and Sealants (Rule 74.20)
7.a. PO0157PC1	General Recordkeeping Requirements.
7.b. PO0157PC1	Solvent Cleaning Additional Requirements.
7.c. PO0157PC1	Stationary Gas Turbine Path Cleaning Solvent Use
7.d. PO0157PC2	Turbine NOx and CO Emissions Limits.
7.e. PO0157PC2	Turbine and Duct Burner Natural Gas Only Requirement.
7.f. PO0157PC2	Nebraska Boiler and Turbine Simultaneous Operation Limits.
7.g. PO0157PC2	Nebraska Boiler NOx Emissions Limits.
7.h. PO0157PC2	Nebraska Boiler NOx and Oxygen Continuous Monitoring Requirements.
7.i. PO0157PC2	Nebraska Boiler Fuel Oil Limitations.
7.j. PO0157PC2	Recordkeeping Requirements for the Nebraska Boiler Fuel Oil Limitations.
7.k. PO0157PC2	Recordkeeping Requirements for the Maxon Duct Burner.
8.a. Rule 50	Opacity.
8.b. Rule 54.B.1	Sulfur Compounds – SOx at Point of Discharge.
8.c. Rule 54.B.2	Sulfur Compounds – SOx at or Beyond Property Line.
8.d. Rule 55	Fugitive Dust

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Requirement ID	Description
8.e. Rule 57.1	Particulate Matter Emissions From Fuel Burning Equipment.
8.f. Rule 64.B.1	Sulfur Content of Fuels – Gaseous Fuel Requirements.
8.g. Rule 64.B.2	Sulfur Content of Fuels – Liquid Fuel Requirements.
8.h. Rule 74.6	Surface Cleaning and Degreasing, 11/11/03 revision.
8.i. Rule 74.11.1	Large Water Heaters and Small Boilers.
8.j. Rule 74.22	Natural Gas-Fired, Fan Type Central Furnaces.
9.a. Rule 74.1	Abrasive Blasting.
9.b. Rule 74.2	Architectural Coatings.
9.c. 40CFR61.M	40 CFR 61 Subpart M – Asbestos NESHAPS.
10.a. Part 70 General	Part 70 Permit General Conditions.
10.b. PO General	Permit to Operate General Conditions.
11.a. 40CFR68RMP-157	Accidental Release Prevention and Risk Management Plans.
11.b. 40CFR82	40 CFR 82 – Protection of Stratospheric Ozone
11c.1. SHIELD-D, Da, Db, Dc)	Permit Shield – 40 CFR Part 60, Subparts D, Da, Db, and Dc.
11c.2. SHIELD-60KKKK	Permit Shield – 40 CFR Part 60, Subpart KKKK
11c.3. SHIELD-63YYYY	Permit Shield – 40 CFR Part 63, Subparts YYYY
11c.4. SHIELD-Engines	Permit Shield – 40 CFR Part 60, Subpart JJJJ, 40 CFR 63, Subpart ZZZZ
11.c.5. SHIELD-40CFR72-78	Permit Shield – 40 CFR Parts 72 – 78.

Section 5 Supporting Records

Requirement ID	Description
Deviation Summary Form	Supporting Documentation.
Source Test Summary Form	Supporting Documentation.
6.a. 74.15N3-0157	Nebraska Boiler fuel use and hours of operation.
7.b. PO0157PC1	Monthly solvent use records
7.c. PO0157PC2	Cogeneration unit and duct burners fuel use and emissions.
8.a. Rule 50	Quarterly opacity observations.
8.c. Rule 54.B.2	District memo dated May 23, 1996.
8.d. Rule 57.1	District memo dated Dec. 3, 1997.



Ventura County  
Air Pollution  
Control District

## ANNUAL COMPLIANCE CERTIFICATION SIGNATURE COVER FORM

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

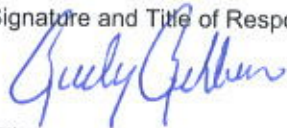


Mr. Gerardo Rios, Chief  
Permits Office (AIR-3)  
Office of Air Division  
EPA Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

### Confidentiality

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

### Certification by Responsible Official

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

Signature and Title of Responsible Official:  Title: 	Date: 
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Time Period Covered by Compliance Certification  <u>04</u> / <u>01</u> / <u>13</u> (MM/DD/YY) to <u>03</u> / <u>31</u> / <u>14</u> (MM/DD/YY)
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Section 1      Signature Cover Form

2013 - 2014  
Annual Title V Compliance Certification  
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May 1, 2014

Section 2      Deviation Summary Forms

### Deviation Summary Table

Date	Breakdown/Event	Comment
April 5, 2013	Nebraska Start-up Failure	Unit attempted to start for a total of one-hour.
May 15, 2013	Nebraska Start-up	During scheduled maintenance shutdown it was discovered that the turbine's hot section was damaged and needed repair off-site.
May 18, 2013	Cold Start-up of Lease Turbine	Ammonia pressure valve failure caused excess NOx during cold start stabilization period.
June 26, 2013	PI data loss	Server was rebooted to allow for network address change coincidentally with start-up of cogen.
July 3, 2013	Corrupted data	Spike in gas use caused by corrupted data from HMI 2 (GE) and the AC 450 on node 12.
September 25, 2013	Nebraska Start-up	Boiler was fired for maintenance check after undergoing boiler tube repairs.
October 8, 2013	Low Inlet NOx Emissions	NOx emission reverted to expected levels after replacing the inlet NOx sample valve.
October 15, 2013	Nebraska Start-up	Replace lease turbine with Mill turbine back from repair off-site.
October 15, 2013	Nebraska CEMS failed O <sub>2</sub> Calibration	Sample probe malfunction due to high temperature resolved by adding blower to cool area.
November 22, 2013	Nebraska Start-up	Boiler was fired to repair the cogen boiler tube leak on the economizer.
December 1, 2013	PI data loss	Power disturbance brought down network.
December 11, 2013	PI data loss	Network connection loss including distributed control system (DCS) and PI interface.
January 8, 2014	Low Inlet NOx Emissions	NOx emission reverted to expected levels after replacing the fitting on the pressure side of the inlet sample line.
February 17, 2014	PI data loss	Voltage drop due to SCE power issue resulted in momentary loss of data between Mark V turbine control system and the DCS.
February 27, 2014	PI data loss	Modbus system failure resulted in momentary loss of data communication.
March 6, 2014	PI data loss	Configuration settings of the new Human Machine Interface were amended to include redundant back-up of Modbus signals.





## ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 04 / 01 / 13 (MM/DD/YY) to 03 / 31 / 14 (MM/DD/YY)

A. Attachment # or Permit Condition #: 7.f. PO00157PC2	B. Equipment description: Nebraska Boiler	C. Deviation Period: Date & Time Begin: <u>4/5/13, 7:07 AM</u> End: <u>4/5/13, 11:49 PM</u> When Discovered: Date & Time <u>4/5/13, 7:07 AM</u>
D. Parameters monitored: Simultaneous operation	E. Limit: 3 hours during cogen start up or shutdown.	F. Actual: 1 hour
G. Probable Cause of Deviation: Boiler did not start.	H. Corrective actions taken: Repair boiler.	

A. Attachment # or Permit Condition #: 7.f. PO00157PC2	B. Equipment description: Nebraska Boiler	C. Deviation Period: Date & Time Begin: <u>5/15/13, 8:45 PM</u> End: <u>5/15/13, 8:45 PM</u> When Discovered: Date & Time <u>5/15/13, 8:45 AM</u>
D. Parameters monitored: Simultaneous operation.	E. Limit: 3 hours during cogen start up or shutdown.	F. Actual: 0 hours
G. Probable Cause of Deviation: During scheduled maintenance shutdown discovered turbine hot section needed repair off-site.	H. Corrective actions taken: Arrange for installation of lease turbine which started up May 18 at 6:16 PM.	

A. Attachment # or Permit Condition #: 6.c. STRMLN0157- NOx, CO, NH3	B. Equipment description: Cogeneration Unit	C. Deviation Period: Date & Time Begin: <u>5/18/13, 6:18 PM</u> End: <u>5/18/13, 10:18 PM</u> When Discovered: Date & Time <u>5/18/13, 6:18 PM</u>
D. Parameters monitored: NOx	E. Limit: 12 hour cold startup.	F. Actual: 4 hours
G. Probable Cause of Deviation: Ammonia pressure valve failure.	H. Corrective actions taken: Valve replaced.	



## ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 04 / 01 / 13 (MM/DD/YY) to 03 / 31 / 14 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 6.c. STRMLN157- NOx, CO, NH3</p>	<p>B. Equipment description: Cogeneration CEMS</p>	<p>C. Deviation Period: Date &amp; Time Begin: <u>6/26/13, 8:12 AM</u> End: <u>6/26/13, 9:39 AM</u> When Discovered: Date &amp; Time <u>6/26/13, 8:12 AM</u></p>
<p>D. Parameters monitored: Intermittence</p>	<p>E. Limit: 96 hours to fix CEMS breakdown (Rule 32).</p>	<p>F. Actual: 1.45 hours.</p>
<p>G. Probable Cause of Deviation: IP/New Indy network separation project interrupted communication.</p>		<p>H. Corrective actions taken: Reboot server to allow for a network address change</p>

<p>A. Attachment # or Permit Condition #: 6.c. STRMLN157- NOx, CO, NH3</p>	<p>B. Equipment description: Cogeneration CEMS</p>	<p>C. Deviation Period: Date &amp; Time Begin: <u>7/3/13, 6:00 AM</u> End: <u>7/3/13, 7:00 AM</u> When Discovered: Date &amp; Time <u>7/3/13, 7:00 AM</u></p>
<p>D. Parameters monitored: Intermittence</p>	<p>E. Limit: 96 hours to fix CEMS breakdown (Rule 32).</p>	<p>F. Actual: 1.5 minutes.</p>
<p>G. Probable Cause of Deviation: Corrupted turbine gas use data from from HMI 2 (GE) and the AC450 on node 12.</p>		<p>H. Corrective actions taken: Filtered turbine gas use data to exclude corrupted data from permit compliance calculations.</p>

<p>A. Attachment # or Permit Condition #: 7.f. PO00157PC2</p>	<p>B. Equipment description: Nebraska boiler</p>	<p>C. Deviation Period: Date &amp; Time Begin: <u>9/25/13, 7:07 PM</u> End: <u>9/25/13, 7:24 PM</u> When Discovered: Date &amp; Time <u>9/25/13, 7:07 PM</u></p>
<p>D. Parameters monitored: Simultaneous operation.</p>	<p>E. Limit: 3 hours during cogen start up or shutdown.</p>	<p>F. Actual: 17 minutes.</p>
<p>G. Probable Cause of Deviation: Maintenance check after undergoing tube repairs.</p>		<p>H. Corrective actions taken: None.</p>



## ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 04 / 01 / 13 (MM/DD/YY) to 03 / 31 / 14 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 6.c. STRMLN157- NOx, CO, NH3</p>	<p>B. Equipment description: Cogeneration CEMS</p>	<p>C. Deviation Period: Date &amp; Time Begin: <u>10/8/13, 10:30 AM</u> End: <u>10/9/13, 3:00 PM</u> When Discovered: Date &amp; Time <u>10/9/13, 8:30 AM</u></p>
<p>D. Parameters monitored: Intermittence.</p>	<p>E. Limit: 96 hours to fix CEMS breakdown (Rule 32).</p>	<p>F. Actual: 28.5 hours</p>
<p>G. Probable Cause of Deviation: Faulty sample valve restricted air flow to NOx probe.</p>		<p>H. Corrective actions taken: Replaced sample valve.</p>

<p>A. Attachment # or Permit Condition #: 7.f. PO00157PC2</p>	<p>B. Equipment description: Nebraska boiler</p>	<p>C. Deviation Period: Date &amp; Time Begin: <u>10/15/13, 4:17 AM</u> End: <u>10/15/13, 7:00 AM</u> When Discovered: Date &amp; Time <u>10/15/13, 4:17 AM</u></p>
<p>D. Parameters monitored: Simultaneous operation.</p>	<p>E. Limit: 3 hours during cogen start up or shutdown.</p>	<p>F. Actual: 2.72 hours for shutdown and start up.</p>
<p>G. Probable Cause of Deviation: Replace lease turbine with Mill turbine back from off-site repair.</p>		<p>H. Corrective actions taken: None.</p>

<p>A. Attachment # or Permit Condition #: 7.h. PO00157PC2</p>	<p>B. Equipment description: Nebraska boiler CEMS</p>	<p>C. Deviation Period: Date &amp; Time Begin: <u>10/15/13, 11:22 AM</u> End: <u>10/15/13, 6:07 PM</u> When Discovered: Date &amp; Time <u>10/15/13, 11:22 AM</u></p>
<p>D. Parameters monitored: Intermittence</p>	<p>E. Limit: 96 hours to fix CEMS breakdown (Rule 32).</p>	<p>F. Actual: 6.75 hours.</p>
<p>G. Probable Cause of Deviation: Probe affected by heat.</p>		<p>H. Corrective actions taken: Install blower to cool probe and shut down boiler on October 17 at 11:00 AM.</p>



## ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 04 / 01 / 13 (MM/DD/YY) to 03 / 31 / 14 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 7.f. PO00157PC2</p>	<p>B. Equipment description: Nebraska boiler</p>	<p>C. Deviation Period: Date &amp; Time Begin: <u>11/22/13, 3:35 PM</u> End: <u>11/22/13, 8:08 PM</u> When Discovered: Date &amp; Time <u>11/22/13, 3:30 PM</u></p>
<p>D. Parameters monitored: Simultaneous operation.</p>	<p>E. Limit: 3 hours during cogen start up or shutdown.</p>	<p>F. Actual: 23 minutes.</p>
<p>G. Probable Cause of Deviation: Repair cogen boiler tube leak on the economizer.</p>		<p>H. Corrective actions taken: None.</p>

<p>A. Attachment # or Permit Condition #: 6.c. STRMLN157- NOx, CO, NH3</p>	<p>B. Equipment description: Cogeneration CEMS</p>	<p>C. Deviation Period: Date &amp; Time Begin: <u>12/1/13, 6:52 AM</u> End: <u>12/1/13, 4:28 PM</u> When Discovered: Date &amp; Time <u>12/1/13, 2:00 PM</u></p>
<p>D. Parameters monitored: Intermittence</p>	<p>E. Limit: 96 hours to fix CEMS breakdown (Rule 32).</p>	<p>F. Actual: 9.6 hours.</p>
<p>G. Probable Cause of Deviation: Power disturbance brought down network in server room.</p>		<p>H. Corrective actions taken: Reboot firewalls and servers.</p>

<p>A. Attachment # or Permit Condition #: 6.c. STRMLN157- NOx, CO, NH3</p>	<p>B. Equipment description: Cogeneration CEMS</p>	<p>C. Deviation Period: Date &amp; Time Begin: <u>12/11/13, 6:06 AM</u> End: <u>12/11/13, 8:10 PM</u> When Discovered: Date &amp; Time <u>12/11/13, 6:06 AM</u></p>
<p>D. Parameters monitored: Intermittence.</p>	<p>E. Limit: 96 hours to fix CEMS breakdown (Rule 32).</p>	<p>F. Actual: 1.32 hours.</p>
<p>G. Probable Cause of Deviation: Total electrical power outage tripped cogen and breaker.</p>		<p>H. Corrective actions taken: Reset breaker and restart cogen and CEMS.</p>



## ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 04 / 01 / 13 (MM/DD/YY) to 03 / 31 / 14 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 6.c. STMLN157- NOx, CO, NH3</p>	<p>B. Equipment description: Cogeneration CEMS</p>	<p>C. Deviation Period: Date &amp; Time Begin: <u>1/8/14, 12:40 PM</u> End: <u>1/8/14, 3:10 PM</u> When Discovered: Date &amp; Time <u>1/8/14, 2:30 PM</u></p>
<p>D. Parameters monitored: Intermittence</p>	<p>E. Limit: 96 hours to fix CEMS breakdown (Rule 32).</p>	<p>F. Actual: 2.5 hours.</p>
<p>G. Probable Cause of Deviation: Loose fitting connection at the pressure side of the inlet NOx sample line.</p>		<p>H. Corrective actions taken: Replaced fitting.</p>

<p>A. Attachment # or Permit Condition #: 6.c. STRMLN157- NOx, CO, NH3</p>	<p>B. Equipment description: Cogeneration CEMS</p>	<p>C. Deviation Period: Date &amp; Time Begin: <u>2/17/14, 2:53 PM</u> End: <u>2/17/14, 3:00 PM</u> When Discovered: Date &amp; Time <u>2/17/14, 2:53 PM</u></p>
<p>D. Parameters monitored: Intermittence.</p>	<p>E. Limit: 96 hours to fix CEMS breakdown (Rule 32).</p>	<p>F. Actual: 7 minutes.</p>
<p>G. Probable Cause of Deviation: Voltage drop in Mill due to SCE power issue.</p>		<p>H. Corrective actions taken: None.</p>

<p>A. Attachment # or Permit Condition #: 6.c. STRMLN157- NOx, CO, NH3</p>	<p>B. Equipment description: Cogeneration CEMS</p>	<p>C. Deviation Period: Date &amp; Time Begin: <u>2/27/14, 1:20 AM</u> End: <u>2/27/14, 1:35 AM</u> When Discovered: Date &amp; Time <u>2/27/13, 3:00 AM</u></p>
<p>D. Parameters monitored: Intermittence.</p>	<p>E. Limit: 96 hours to fix CEMS breakdown (Rule 32).</p>	<p>F. Actual: 15 minutes.</p>
<p>G. Probable Cause of Deviation: Modbus system.</p>		<p>H. Corrective actions taken: Considering upgrade to modbus system</p>



## ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 04 / 01 / 13 (MM/DD/YY) to 03 / 31 / 14 (MM/DD/YY)

A. Attachment # or Permit Condition #: 6.c. STMLN157- NOx, CO, NH3	B. Equipment description: Cogeneration CEMS	C. Deviation Period: Date & Time Begin: <u>3/6/14, 10:52 PM</u> End: <u>3/7/14, 8:35 AM</u> When Discovered: Date & Time <u>3/6/14, 11:42 PM</u>
D. Parameters monitored: Intermittence	E. Limit: 96 hours to fix CEMS breakdown (Rule 32).	F. Actual: 9.72 hours.
G. Probable Cause of Deviation: Modbus data not updating due to installation of new Human Machine Interface (HMI).	H. Corrective actions taken: Amended configuration of new HMI to allow for redundant back up of Modbus signals.	

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

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

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May 1, 2014

Section 3      Source Test Summary Forms



## ANNUAL COMPLIANCE CERTIFICATION

### SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 04 / 01 / 13 (MM/DD/YY) to 03 / 31 / 14 (MM/DD/YY)

A. Emission Unit Description: Gas turbine based cogeneration unit			B. Pollutant: NOx
C. Measured Emission Rate: 10.9 ppm @ 15% O2	D. Limited Emission Rate: 12 ppm @ 15% O2	E. Specific Source Test or Monitoring Record Citation: AirX Source Test	F. Test Date: 3/25/2014

A. Emission Unit Description: Gas turbine based cogeneration unit			B. Pollutant: NH3
C. Measured Emission Rate: 3.4 ppm @ 15% O2	D. Limited Emission Rate: 20 ppm @ 15% O2	E. Specific Source Test or Monitoring Record Citation: AirX Source Test	F. Test Date: 3/25/2014

A. Emission Unit Description: Gas turbine based cogeneration unit			B. Pollutant: CO
C. Measured Emission Rate: 16.43 lbs/hr	D. Limited Emission Rate: 59.65 lbs/hr	E. Specific Source Test or Monitoring Record Citation: AirX Source Test	F. Test Date: 3/25/2014

A. Emission Unit Description: Gas turbine based cogeneration unit			B. Pollutant: NOx
C. Measured Emission Rate: 45.74 tons/year calculated by CEMS	D. Limited Emission Rate: 50 tons/year	E. Specific Source Test or Monitoring Record Citation: AirX RATA Test to confirm CEMS data.	F. Test Date: 3/25/2014

A. Emission Unit Description: Gas turbine based cogeneration unit			B. Pollutant: CO
C. Measured Emission Rate: 62.9 tons/year calculated by CEMS.	D. Limited Emission Rate: 97.66 tons/year	E. Specific Source Test or Monitoring Record Citation: AirX RATA Test to confirm CEMS data.	F. Test Date: 3/25/2014





Ventura County  
Air Pollution  
Control District

## ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 04 / 01 / 13 (MM/DD/YY) to 03 / 31 / 14 (MM/DD/YY)

A. Emission Unit Description: Nebraska Boiler (stand-by only, natural gas only)			B. Pollutant: NOx
C. Measured Emission Rate: 52 ppm @ 3% O <sub>2</sub>	D. Limited Emission Rate: 74 ppm @ 3% O <sub>2</sub>	E. Specific Source Test or Monitoring Record Citation: West Coast Environmental	F. Test Date: 12/22/94

A. Emission Unit Description: Nebraska Boiler (stand-by, fuel oil only)			B. Pollutant: NOx
C. Measured Emission Rate: not applicable	D. Limited Emission Rate: 67 ppm @ 3% O <sub>2</sub>	E. Specific Source Test or Monitoring Record Citation: n/a, not operated on fuel oil.	F. Test Date: n/a

A. Emission Unit Description: Maxon Duct Burner			B. Pollutant: NOx
C. Measured Emission Rate: 0.92 tons/year	D. Limited Emission Rate: 1.90 tons/year	E. Specific Source Test or Monitoring Record Citation: West Coast Environmental	F. Test Date: 8/17/95

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

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

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New-Indy Oxnard, LLC  
May 1, 2014

Section 4      Permit Attachment Forms



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 13 (MM/DD/YY) to 03 / 31 / 14 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <u>6.a.74.15N3-0157</u></p>	<p>D. Frequency of monitoring:  <u>Continuous</u></p>
<p>B. Description: <u>Rule 75.15.C.3. Boilers, Steam Generators, and Process Heaters - Exemption for Emergency Stand-by Units</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <u>n/a</u></p>
<p>C. Method of monitoring:  <u>Hour meter and CEMS. Nebraska unit operated on 9 days and so no tune-up was performed.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>  G. Compliance Status? (C or I): <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>6.b.103N5-0157</u></p>	<p>D. Frequency of monitoring:  <u>Continuous</u></p>
<p>B. Description: <u>Rule 103, Stack Monitoring - Nebraska Boiler</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <u>n/a</u></p>
<p>C. Method of monitoring:  <u>Fuel meter and CEMS. Maximum rolling 12-month capacity factor is 1.09% and unit remains exempt from 103.A.2.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>  G. Compliance Status? (C or I): <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>6.c.STRMLN157-NOx, CO, NH3</u></p>	<p>D. Frequency of monitoring:  <u>Continuous</u></p>
<p>B. Description: <u>Gas Turbine Based Cogeneration Unit; NOx, CO, NH3 Applicable Requirements - NOx Streamline</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable <u>EPA Method 20, ARB Method 100 BAAQMD Method ST-1B</u></p>
<p>C. Method of monitoring:  <u>Annual source test and CEMS for fuel use, NOx, CO, O2, NH3, and control system operating parameters.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>  G. Compliance Status? (C or I): <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: <u>6.d. STRMLN157-SOx</u></p>	<p>D. Frequency of monitoring:  <u>Continuous</u></p>
<p>B. Description: <u>Gas Turbine Based Cogeneration Unit; SOx Applicable Requirements - Streamlined</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable <u>EPA Method 6, 6A, 6C, 15, 16A, 16B, or SCAQMD 307-94</u></p>
<p>C. Method of monitoring:  <u>Facility burns PUC quality gas only. Annual source test would be required if non-PUC quality gas were used.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>New Requirement</u></p>	<p>D. Frequency of monitoring:  <u>Continuous and monthly</u></p>
<p>B. Description:  <u>Mandatory Greenhouse Gas Reporting (40 CFR 98)</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <u>n/a</u></p>
<p>C. Method of monitoring:  <u>Natural gas consumption by fuel meters, CEMS, and invoices from gas company.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>New Requirement</u></p>	<p>D. Frequency of monitoring:  <u>Monthly</u></p>
<p>B. Description:  <u>Rule 74.20 - Adhesives and Sealants</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <u>n/a</u></p>
<p>C. Method of monitoring:  <u>Maintain records of quantity and ROC content for each adhesive purchased to document emissions less than 200 lb/yr.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: <u>7.a. PO00157PC1</u></p>	<p>D. Frequency of monitoring: <u>Continuous</u></p>
<p>B. Description:  <u>General Recordkeeping Requirements</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable <u>n/a</u></p>
<p>C. Method of monitoring: <u>Monthly records of throughput and consumption.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>            G. Compliance Status? (C or I): <u>C</u>            H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>            *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>7.b. PO00157PC1</u></p>	<p>D. Frequency of monitoring: <u>Continuous</u></p>
<p>B. Description:  <u>Solvent Cleaning Additional Requirements</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable <u>n/a</u></p>
<p>C. Method of monitoring: <u>Monthly records of solvent purchases. MSDS provided for new materials in Section 5 (LPS Chainmate and LPS LST).</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>            G. Compliance Status? (C or I): <u>C</u>            H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>            *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>7.c. PO00157PC1</u></p>	<p>D. Frequency of monitoring: <u>continuous</u></p>
<p>B. Description:  <u>Stationary Gas Turbine Gas Path Cleaning Solvent Use</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable <u>n/a</u></p>
<p>C. Method of monitoring: <u>Maintain solvent information. No cleaning activities occurred during permit year.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>            G. Compliance Status? (C or I): <u>C</u>            H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>            *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: <u>7.d. PO00157PC2</u></p>	<p>D. Frequency of monitoring:  <u>Continuous</u></p>
<p>B. Description:  <u>Turbine NOx and CO Emissions Limits</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <u>n/a</u></p>
<p>C. Method of monitoring: <u>Monthly calculations based upon NOx and CO hourly emissions from CEMS.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>            G. Compliance Status? (C or I): <u>C</u>            H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>            *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>7.e. PO00157PC2</u></p>	<p>D. Frequency of monitoring:  <u>Continuous</u></p>
<p>B. Description:  <u>Turbine and Duct Burner Natural Gas Only Requirement</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <u>n/a</u></p>
<p>C. Method of monitoring: <u>Fueled by natural gas only.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>            G. Compliance Status? (C or I): <u>C</u>            H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>            *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>7.f. PO00157PC2</u></p>	<p>D. Frequency of monitoring:  <u>Continuous</u></p>
<p>B. Description:  <u>Nebraska Boiler and Turbine Simultaneous Operation Limits</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <u>n/a</u></p>
<p>C. Method of monitoring: <u>Annual compliance certification and records of operation of the Boiler.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>            G. Compliance Status? (C or I): <u>C</u>            H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>            *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: <u>7.g. PO00157PC2</u></p>	<p>D. Frequency of monitoring:  <u>Continuous, Daily</u></p>
<p>B. Description:  <u>Nebraska Boiler NOx Emissions Limits</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <u>n/a</u></p>
<p>C. Method of monitoring: <u>CEMS for fuel consumption, NOx and oxygen. Daily zero and span drift checks when boiler is in operation.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>  G. Compliance Status? (C or I): <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>7.h. PO00157PC2</u></p>	<p>D. Frequency of monitoring:  <u>Continuous, Daily</u></p>
<p>B. Description:  <u>Nebraska Boiler NOx and Oxygen Continuous Monitoring Requirements.</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <u>n/a</u></p>
<p>C. Method of monitoring: <u>CEMS for fuel consumption, NOx and oxygen. Daily zero and span drift checks when boiler is in operation.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>  G. Compliance Status? (C or I): <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>7.i. PO00157PC2</u></p>	<p>D. Frequency of monitoring:  <u>Continuous</u></p>
<p>B. Description:  <u>Nebraska Boiler Oil Limitations</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable <u>ASTM Method D4294-83 or D2622-87</u></p>
<p>C. Method of monitoring: <u>No diesel fuel was burned. If fuel oil is burned, then record: the reason for firing fuel oil; delivery dates and amounts; and fuel sulfur content.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>  G. Compliance Status? (C or I): <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: <u>7.j. PO00157PC2</u></p>	<p>D. Frequency of monitoring:  <u>Continuous</u></p>
<p>B. Description:  <u>Recordkeeping Requirements for the Nebraska Boiler Fuel Oil Limitations</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable <u>ASTM Method D4294-83 or D2622-87</u></p>
<p>C. Method of monitoring: <u>No diesel fuel was burned. If fuel oil is burned, then record: the reason for firing fuel oil; delivery dates and amounts; and fuel sulfur content.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>            G. Compliance Status? (C or I): <u>C</u>            H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>            *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>7.k. PO00157PC2</u></p>	<p>D. Frequency of monitoring:  <u>Continuous</u></p>
<p>B. Description:  <u>Recordkeeping Requirements for the Maxon Duct Burner</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable <u>n/a</u></p>
<p>C. Method of monitoring: <u>Monitor time and duration of the Maxon Burner's use, and fuel consumption.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>            G. Compliance Status? (C or I): <u>C</u>            H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>            *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>8.a. Rule 50</u></p>	<p>D. Frequency of monitoring:  <u>Quarterly</u></p>
<p>B. Description:  <u>Opacity</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable <u>EPA Method 22</u></p>
<p>C. Method of monitoring: <u>Stack opacity routinely observed. Observations on 5/21/13, 8/15/13, 11/21/13, and 2/10/14 are formally documented.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>            G. Compliance Status? (C or I): <u>C</u>            H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>            *If yes, attach Deviation Summary Form</p>





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<p>A. Attachment # or Permit Condition #: <u>8.b. Rule 54.B.1</u></p>	<p>D. Frequency of monitoring:  <u>Continuous</u></p>
<p>B. Description:  <u>Sulfur Compounds - SOx at Point of Discharge</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <u>n/a</u></p>
<p>C. Method of monitoring: <u>Follow Rule 64 monitoring requirements. Compliance with Rule 64 ensures compliance with this rule based on District analysis.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>8.c. Rule 54.B.2</u></p>	<p>D. Frequency of monitoring:  <u>Continuous</u></p>
<p>B. Description:  <u>Sulfur Compounds - SOx at or Beyond Property Line</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <u>n/a</u></p>
<p>C. Method of monitoring: <u>Compliance by use of PUC quality natural gas as discussed in District memo (5/23/96)</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>8.d. Rule 55</u></p>	<p>D. Frequency of monitoring:  <u>Continuous</u></p>
<p>B. Description:  <u>Fugitive Dust</u></p>	<p>E. Source test reference method, if applicable Attach Source Test Summary Form, if applicable  <u>EPA Methods 9 and 22</u></p>
<p>C. Method of monitoring: <u>There are no operations, disturbed surface areas or man-made conditions at this stationary source that are subject to Rule</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: <u>8.e. Rule 57.1</u></p>	<p>D. Frequency of monitoring:  <u>Continuous</u></p>
<p>B. Description:  <u>Particulate Matter Emissions from Fuel Burning Equipment</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <u>n/a</u></p>
<p>C. Method of monitoring: <u>Compliance assured based on District analysis (12/3/97).</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>  G. Compliance Status? (C or I): <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>8.f. Rule 64.B.1</u></p>	<p>D. Frequency of monitoring:  <u>Continuous</u></p>
<p>B. Description:  <u>Sulfur Content of Fuels - Gaseous Fuel Requirements</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable <u>SCAQMD Method 307-94 or ASTM Method D1072-90</u></p>
<p>C. Method of monitoring: <u>Monitor source of natural gas and perform source test annually if non-PUC gas is burned.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>  G. Compliance Status? (C or I): <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>8.g. Rule 64.B.2</u></p>	<p>D. Frequency of monitoring:  <u>Continuous</u></p>
<p>B. Description:  <u>Sulfur Content of Fuels - Liquid Fuel Requirements</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable <u>ASTM Method D4294-83 or D2622-87</u></p>
<p>C. Method of monitoring: <u>Monitor type of fuel burned and obtain a fuel supplier certification or fuel test per each delivery.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>  G. Compliance Status? (C or I): <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: <u>8.h. Rule 74.6 (2003)</u></p>	<p>D. Frequency of monitoring:  <u>Continuous</u></p>
<p>B. Description:  <u>Surface Cleaning and Degreasing</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <u>n/a</u></p>
<p>C. Method of monitoring: <u>Maintain current solvent information. Routine surveillance of solvent cleaning activities. Solvent testing upon request.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>8.i. Rule 74.11.1</u></p>	<p>D. Frequency of monitoring:  <u>Continuous</u></p>
<p>B. Description:  <u>Large Water Heaters and Small Boilers</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <u>n/a</u></p>
<p>C. Method of monitoring: <u>Facility did not install an affected unit (between 75,000 BTU/hr and 2,000,000 BTU/hr) .</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>8.j. Rule 74.22</u></p>	<p>D. Frequency of monitoring:  <u>Continuous</u></p>
<p>B. Description:  <u>Natural Gas-Fired, Fan Type Central Furnaces</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <u>n/a</u></p>
<p>C. Method of monitoring: <u>Maintain furnace identification. Rule only applies to future installs.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: <u>9.a. Rule 74.1</u></p>	<p>D. Frequency of monitoring:</p> <p style="text-align: center;"><u>Continuous</u></p>
<p>B. Description:</p> <p><u>Abrasive Blasting</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p> <p style="text-align: center;"><u>n/a</u></p>
<p>C. Method of monitoring:</p> <p><u>Routine surveillance and visual inspections CD Lyon Construction, Inc. (PTO 7141) performs abrasive blasting at the facility.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p style="font-size: small;">*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>9.b. Rule 74.2</u></p>	<p>D. Frequency of monitoring:</p> <p style="text-align: center;"><u>Continuous</u></p>
<p>B. Description:</p> <p><u>Architectural Coatings</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p> <p style="text-align: center;"><u>n/a</u></p>
<p>C. Method of monitoring:</p> <p><u>Routine surveillance and visual inspections CD Lyon Construction, Inc. (PTO 7141) performs architectural coating activities at the facility.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p style="font-size: small;">*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>9.c. 40CFR61.M</u></p>	<p>D. Frequency of monitoring:</p> <p style="text-align: center;"><u>Continuous</u></p>
<p>B. Description:</p> <p><u>Asbestos NESHAPS</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p> <p style="text-align: center;"><u>X</u></p>
<p>C. Method of monitoring:</p> <p><u>Follow inspection, recordkeeping, and notification procedures from 40CFR61.145.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p style="font-size: small;">*If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: <u>10.a. Part 70 General</u></p>	<p>D. Frequency of monitoring:  <u>Continuous</u></p>
<p>B. Description:  <u>Part 70 Permit General Conditions</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <u>n/a</u></p>
<p>C. Method of monitoring: <u>Throughput and emissions limits; other requirements of the permit; notification; permit modification and renewal; and reporting requirements.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: <u>10.b. PO General</u></p>	<p>D. Frequency of monitoring:  <u>Continuous</u></p>
<p>B. Description:  <u>Permit to Operate General Conditions</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <u>n/a</u></p>
<p>C. Method of monitoring: <u>The facility operated in compliance with these requirements including postings.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: <u>11.a 40CFR68RMP-157</u></p>	<p>D. Frequency of monitoring:  <u>Continuous</u></p>
<p>B. Description:  <u>Accidental Release Prevention and Risk Management Plans</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <u>n/a</u></p>
<p>C. Method of monitoring: <u>The facility is exempt from federal regulation based on quantity stored. State plan was updated in 2011 in coordination with Oxnard Fire Dept.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 13 (MM/DD/YY) to 03 / 31 / 14 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 11.b 40CFR82</p>	<p>D. Frequency of monitoring:  Continuous</p>
<p>B. Description: Protection of Stratospheric Ozone</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable n/a</p>
<p>C. Method of monitoring: Facility did not conduct activities subject to this regulation.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>            G. Compliance Status? (C or I): <u>C</u>            H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>            *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 11.c.1 SHIELD-D, Da, Db, Dc</p>	<p>D. Frequency of monitoring:  Continuous</p>
<p>B. Description: Permit Shield for 40CFR60, Subparts D, Da, Db, and Dc</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable n/a</p>
<p>C. Method of monitoring: Facility did not modify or install equipment that would trigger these requirements. Therefore, this permit shield remains in effect.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>            G. Compliance Status? (C or I): <u>C</u>            H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>            *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 11.c.2. SHIELD-60KKKK</p>	<p>D. Frequency of monitoring:  Continuous</p>
<p>B. Description: 40CFR60 Subpart KKKK, Standards of Performance for Stationary Combustion Turbines</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable n/a</p>
<p>C. Method of monitoring: Facility did not modify or install equipment that would trigger these requirements. Therefore, this permit shield remains in effect.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>            G. Compliance Status? (C or I): <u>C</u>            H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>            *If yes, attach Deviation Summary Form</p>



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 13 (MM/DD/YY) to 03 / 31 / 14 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <u>11.c.3 SHIELD-63YYYY</u></p>	<p>D. Frequency of monitoring: <u>Continuous</u></p>
<p>B. Description:  <u>National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable <u>n/a</u></p>
<p>C. Method of monitoring: <u>Emissions of Hazardous Air Pollutants remain less than major source thresholds (10 tpy single HAP, 25 tpy combined HAPs).</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>            G. Compliance Status? (C or I): <u>C</u>            H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>            *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>11.c.4 SHIELD-Engines</u></p>	<p>D. Frequency of monitoring: <u>Annual and continuous during operation</u></p>
<p>B. Description:  <u>Permit Shield for 40CFR60 Subparts JJJJ and 40CFR63 Subpart ZZZZ</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable <u>n/a</u></p>
<p>C. Method of monitoring: <u>Facility did not modify or install equipment subject to the NSPS JJJJ. Non-resettable hour meter and reasons for operation as needed to qualify for this permit shield.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>            G. Compliance Status? (C or I): <u>C</u>            H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>            *If yes, attach Deviation Summary Form</p>

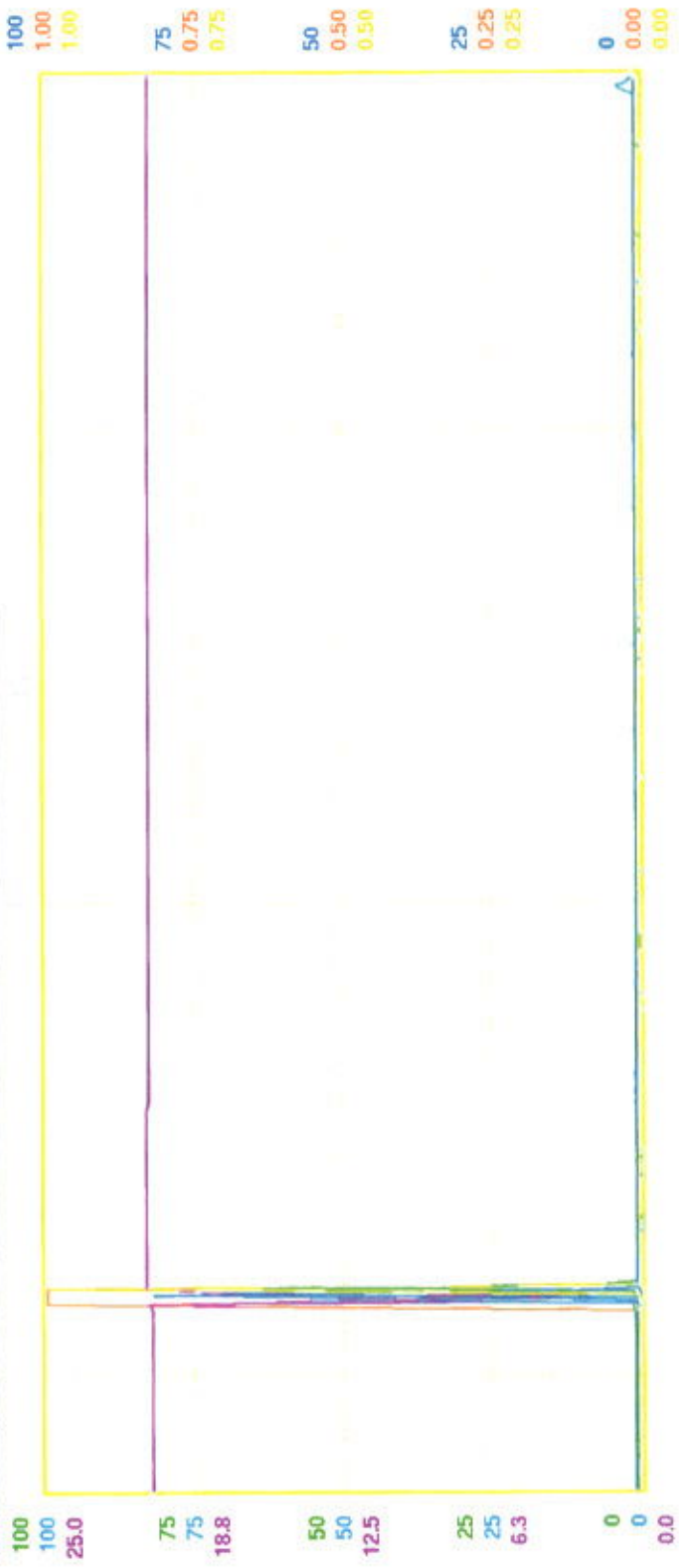
<p>A. Attachment # or Permit Condition #: <u>11.c.5 SHIELD-40CFR72-78</u></p>	<p>D. Frequency of monitoring: <u>Continuous</u></p>
<p>B. Description:  <u>Permit Shield for 40CFR Parts 72 through 78</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable <u>n/a</u></p>
<p>C. Method of monitoring: <u>The facility supplied less than 219,000 MW-hr/yr to any utility power distribution system. Therefore, this permit shield remains in effect.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>            G. Compliance Status? (C or I): <u>C</u>            H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>            *If yes, attach Deviation Summary Form</p>

# Nebraska Boiler - Daily Environmental Report



Period: 5/15/2013 - 5/16/2013





ON/Name	Description	Attribute	Treatment	Ruler Time	Ruler Value	Current Value	Unit	Filter	Time Offset	Form
931AIC1111A.NOX	B&W SCR INLET NOX	MV	Mom	07:00 2013-05-16	0.41	0.22	PPM			
931AIC1111C.CO	B&W BLR STACK RAW CO	MV	Mom	07:00 2013-05-16	0.86	0.68	PPM			
931AIC1111B.O2	B&W BLR RAW O2%	MV	Mean	07:00 2013-05-16	20.70	20.74	%			
931AIC1111D.NOX	B&W BLR STACK NOX	MV	Mean	07:00 2013-05-16	0.14	0.12	PPM			
931-AIC-1111.INCAL	RSMT CEMS IN CAL	MV	Mom	07:00 2013-05-16	0	0				
931-aic-1111.trb	RSMT CEMS TROUBLE	MV	Mom	07:00 2013-05-16	0	0				

D1 30 minutes D2 1 hour D3 8 hours D4 1 day D5 10 days  
 D6 Positioning... D7 Trace Control... D8 Analyze... D9 Trace Config... D10 Extended Config...



DRY SHIFT OPERATOR

NAME: *Van Tandt*

NIGHT SHIFT OPERATOR

NAME: *H. Brown*

NAME:

# OFFICIAL DAILY COGENERATION LOG

MICAL PUMPS		STEAM & WATER READINGS		GAS & ELECTRIC READING		TURBINE		BOILER TEST RESULTS			
Level	Feed Rate ml/min	NEBRASKA PERMATE H <sub>2</sub> O	CONCENTRATE H <sub>2</sub> O	LL	HP	SCG LP	YES	NO	DAY SHIFT	NIGHT SHIFT	
Steamrate 3.9 m/min		084520410	5188206	63508778	30	1898460		5:00	1385	89198	
Control 5.3 m/min		PREVIOUS 084058770	50836610	62482346	20	1966350			249868	89198	
Polymat 8.8 m/min		NEW DEWIM TRAILER							216230		
Coaxial (as needed)		AMMONIA DELIVERY									
		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	
		NEBRASKA DELIVERY	YES	NO	% FULL:						
		NEBRASKA H <sub>2</sub> O STORAGE CHECK									
		BATTERIES	V HP RECOURSE	FAL BATTERIES	V HP RECOURSE	FAL BATTERIES	V HP RECOURSE	FAL BATTERIES	V HP RECOURSE	FAL BATTERIES	
		AIR INLET DIFF	IN/H2O HP RECOURSE	FAR AIR INLET DIFF	IN/H2O HP RECOURSE	FAR AIR INLET DIFF	IN/H2O HP RECOURSE	FAR AIR INLET DIFF	IN/H2O HP RECOURSE	FAR AIR INLET DIFF	
		L.O. DIFFERENTIAL	PSI HP RECOURSE	AFT L.O. DIFFERENTIAL	PSI HP RECOURSE	AFT L.O. DIFFERENTIAL	PSI HP RECOURSE	AFT L.O. DIFFERENTIAL	PSI HP RECOURSE	AFT L.O. DIFFERENTIAL	
		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	5:00
		GEN.	AMPS GEN VARS	MEGA VARS GEN.	V FIELD	AMPS GEN VARS	MEGA VARS GEN.	V FIELD	AMPS GEN VARS	MEGA VARS GEN.	
		FIELD	AMPS FIELD VOLTS	V FIELD	AMPS FIELD VOLTS	V FIELD	AMPS FIELD VOLTS	V FIELD	AMPS FIELD VOLTS	V FIELD	
		COOLING TWR INLET	F COOLING TWR INLET	F COOLING TWR INLET	F COOLING TWR INLET	F COOLING TWR INLET	F COOLING TWR INLET	F COOLING TWR INLET	F COOLING TWR INLET	F COOLING TWR INLET	
		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	5:00
		450 Header Temp	°F								
		HP Drum Level	IN								
		LP Drum Level	IN								
		HP Drum Pressure	PSI								
		LP Drum Pressure	PSI								
		CO	PSM								
		MOX	PPM								
		O2	%								
		Hot Well Level	%								
		11:50 SET POINT	11:03 B SET POINT	11:50 SET POINT	11:03 B SET POINT	11:50 SET POINT	11:03 B SET POINT	11:50 SET POINT	11:03 B SET POINT	11:50 SET POINT	
		SCANNER BLOWER ( ON ) Y/N	DUCT BURNER	SP	SCANNER BLOWER DN Y/N	DUCT BURNER S.P.					
		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	5:00
		Filler Separator	PSI								
		Gas Receiver	PSI								
		Drum Level	IN								
		Drum Pressure	PSI								
		Steam Flow	#/HR								
		Steam Temp	°F								
		MOX	PPM								
		O2	%								
		Blow Down Conductivity MHDS									
		ON LINE TURBINE WATER WASH	YES	NO	COODCTIVITY MHDS						
		BOILER FEED WATER PUMP OPERATION	NO	1	YES	NO	NO	2	YES	NO	
		NEBRASKA BOILER	DRUM LEVEL	50%	45%	47%	48%	48%	48%	48%	
		DRUM PRESSURE	30	30	30	30	30	30	30	30	
		STEAM FLOW	841660	841660	841660	841660	841660	841660	841660	841660	
		STEAM TEMP	353.2	353.2	353.2	353.2	353.2	353.2	353.2	353.2	
		MOX	5.10	5.10	5.10	5.10	5.10	5.10	5.10	5.10	
		O2	1.83	1.83	1.83	1.83	1.83	1.83	1.83	1.83	
		CONDUCTIVITY	75	75	75	75	75	75	75	75	
		PHOSPHATE	5-25	5-25	5-25	5-25	5-25	5-25	5-25	5-25	
		SILOCA	<20	<20	<20	<20	<20	<20	<20	<20	
		PH	9.5	9.5	9.5	9.5	9.5	9.5	9.5	9.5	
		CONDUCTIVITY	75	75	75	75	75	75	75	75	
		SOFTNER	Running (1 or 2)								
		HARDNESS	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	
		NEBRASKA									
		PH	9.5	9.5	9.5	9.5	9.5	9.5	9.5	9.5	
		CONDUCTIVITY	75	75	75	75	75	75	75	75	
		SILOCA	<20	<20	<20	<20	<20	<20	<20	<20	
		PHOSPHATE	5-25	5-25	5-25	5-25	5-25	5-25	5-25	5-25	
		STEAM TEST									
		SILOCA	<20	<20	<20	<20	<20	<20	<20	<20	
		PV NO.2									
		MOYBDATE	>200	>200	>200	>200	>200	>200	>200	>200	
		NOTES:									
		APCO called 2. Me's									
		3. Me's 1.4. 2. 2. 4. 5 / 6. 1. 2. 3. 4. 5									

DATE: 5-15-13 SAFETY IS ALWAYS NO. 1

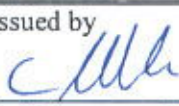
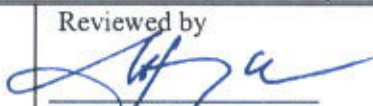
MOF 889-5111 REV 1

MOF 1000

Hueneme Paper Mill

## Hueneme Mill Environmental Incident Report

Shaded section to be completed by the EMR

Name of Incident Turbine LM2500 plus hot section damage		Incident Date 5/15/13	
Exact Location Incident Cogen			
Reported By C. Wilson		Estimated Start and Stop Times of Incident: @2045	Possible Cause: start up Nebraska Blr
Incident Type: <input checked="" type="checkbox"/> Spill Internal <input checked="" type="checkbox"/> Improper Waste Disposal <input checked="" type="checkbox"/> Spill External <input type="checkbox"/> Near miss or below spill release guidelines X Air Emission <input checked="" type="checkbox"/> Other _____		Released To <input checked="" type="checkbox"/> Storm Water System <input type="checkbox"/> Secondary Containment <input checked="" type="checkbox"/> Process Sewer <input checked="" type="checkbox"/> X Air <input checked="" type="checkbox"/> Ground (External) <input type="checkbox"/> Ground (Inside Mill Property) <input checked="" type="checkbox"/> Near Miss <input checked="" type="checkbox"/> Other _____	
Detailed Description of Event On 14 Apr= borescope of turbine LM 2500+ found damage to Hot section - making it unserviceable.  APCD was contacted @2045 5/15/13 on start-up of Nebraska boiler. Message left by C. Wilson.  (if required use additional paper and attach)			
Estimated Amount Released <input checked="" type="checkbox"/> _____ Gallons <input type="checkbox"/> _____ Pounds <input checked="" type="checkbox"/> Other _____		pH	CONSISTENCY (%)
Estimated Monetary Loss			
List Any External Emergency Clean Up Personnel Contacted N/A		List Any External Agencies Contacted (Agency, person and time of call.) APCD @ 2045	
List Hueneme Personnel Contacted (Foreman, Mill Manager, etc.) Lars Gustavson, Rudy Rehbein, Robyn Lebrilla, Victor Kumpera		Any Acute or Chronic Health Risks (refer to MSDS) N/A	
Describe Any Emergency Response Actions N/A			
Suggestions to Prevent Reoccurrence			Estimated Completion Date
1.			1.
2.			2.
3.			3.
4.			4.
Root Cause after investigation  Maintenance issue- reported to APCD- start up of Nebraska Boiler.		Severity Level (level 1 and 2 must be tracked through SHIMS) <input checked="" type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input checked="" type="checkbox"/> 3 <input checked="" type="checkbox"/> 4	
Investigated By: Charlie Wilson		Investigated Date 5/15/13	
Follow Up		By When	Completion Date
Issued by  Department Manager 5/16/13	Reviewed by  Technical Superintendent 5/16/2013	Approved by _____ Mill Manager	

Print Time: 5/16/2013 11:21:05 AM

Note: This document is valid for only ONE week after print time!

# NEW INDY

## CONTAINERBOARD

May 21, 2013

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

Subject: Turbine start-up – May 18, 2013

Dear Mr. Olson:

This letter is a follow up on the call made by Charlie Wilson to the VCAPCD Breakdown Center Hotline on May 18, 2013 at about 8:45 PM.

During the scheduled maintenance shutdown on May 14, it was discovered that the turbine's hot section was damaged. The turbine was pulled out for offsite repair and the Nebraska boiler was fired up while waiting for the lease turbine. The lease turbine arrived in the mill on May 17 and was started-up on May 18 at 6:16 PM. During the start-up, the NOx emission was high for 4 hours and O2 was at 17% to 18% range. Troubleshooting revealed that the ammonia pressure regulator had failed. After replacing the failed pressure regulator, the ammonia flow was operated back in automatic control for NOx. For O2 issue, the CEMS was inspected for potential air leak and sample lines were checked for potential moisture issue. The technician did not find any issues so the mill had planned to contact Rosemount CEMS specialist. However, O2 reverted to expected values on May 19 at about 7 PM.

The cogen was down from May 14 at 5:19 AM to May 18 at 6:16 PM. Since the cogen was down for more than 24 hours, NOx emission limits do not apply during the stabilization period associated with cold start-up. Therefore, there was no associated excess emission during the start-up described above.

The Daily Emission Sheets, PI trends, DCS trends, Cogen Reports and Environmental Incident Report have been provided for your review. If you have any questions or require any additional information, please call me at (805) 271-7284.

Sincerely,



Robyn Lebrilla  
Environmental Engineer

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**NEW INDY OXNARD, LLC**

5936 PERKINS ROAD • OXNARD, CALIFORNIA 93033 • [WWW.NEWINDYCONTAINERBOARD.COM](http://WWW.NEWINDYCONTAINERBOARD.COM)  
PHONE (805) 986-3881 • FAX (805) 488-5186



Ventura County  
Air Pollution  
Control District

## RESPONSIBLE OFFICIAL'S CERTIFICATION FORM

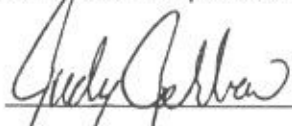
Ventura County APCD Rule 33.9 requires that "any document, including reports, schedule of compliance progress reports and compliance certifications, required by a Part 70 permit shall be certified by a responsible official." Therefore, this form shall be signed by the company's Responsible Official and 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.

<p>Signature and Title of Responsible Official:</p> <p>Signature: <u></u></p> <p>Title: <u>Mill Manager</u></p>	<p>Date:</p> <p><u>5/21/2013</u></p>
--	--------------------------------------

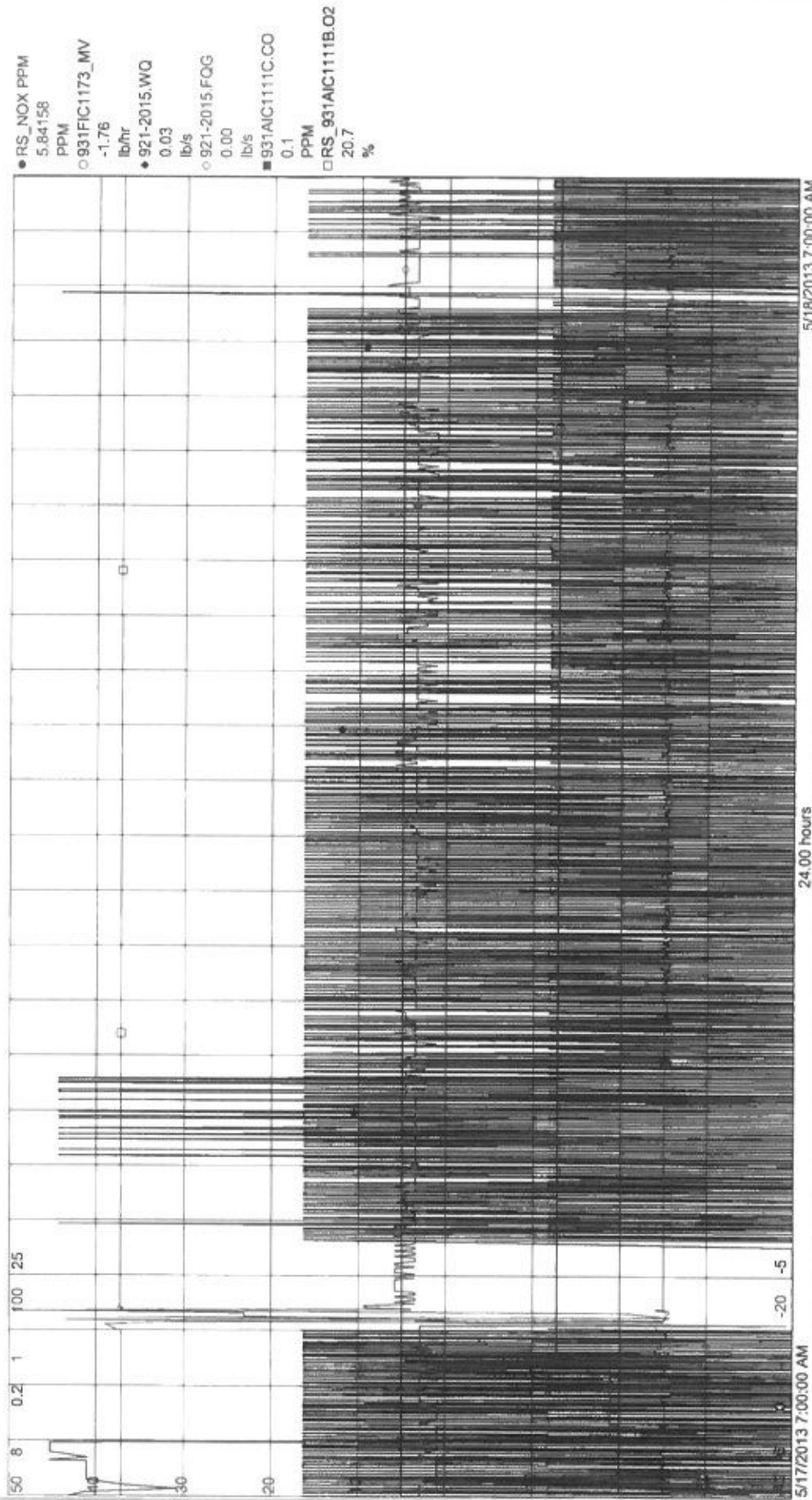
**DAILY ENVIRONMENTAL REPORT**

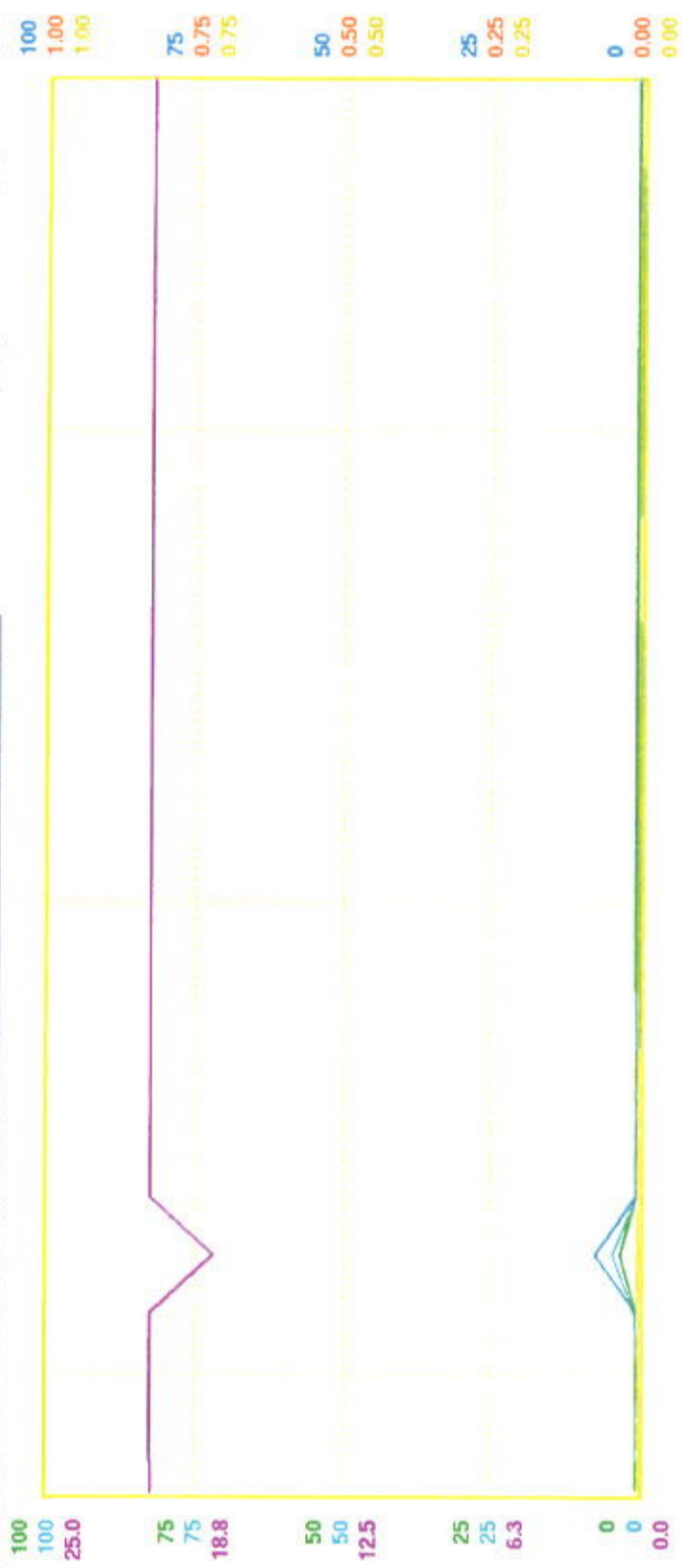
5/18/2013 7:30      5/17/2013 7:30

Time	5/18/2013 7:30		5/17/2013 7:30		SCR Inlet Temperature %	SCR Inlet NOx ppm	Ammonia Usage lbs/hr	NH3-NHx mole ratio	Injection rate lbs/hr	Steam to Fan ratio	NOx lbs/hr	Stack O2 %	Stack CO ppm	Stack SO2 lbs/hr	Nebraska O2 %	Nebraska NOx %	Nebraska CO2 (to % O2)	Daily Av Copem NOx lbs/hr	Daily Av Copem SO2 lbs/hr
	Duct burner gas flow MFC/FH	Turbine gas flow MFC/FH	Duct burner gas flow MFC/FH	Turbine gas flow MFC/FH															
8:00	-0.03	0.00	0.22	0.22	487.91	0.22	-677485.38	0.06	0.00	0.00	0.00	20.52	0.00	1.78	20.52	19.56	0.00	0.00	
9:00	-0.03	0.00	0.22	0.22	487.92	0.22	287856.45	0.06	0.00	0.00	0.00	1.71	0.00	1.71	20.33	18.00	0.00	0.00	
10:00	-0.03	0.00	0.23	0.23	487.93	0.23	231141.66	0.06	0.00	0.00	0.00	1.82	0.00	1.82	10.77	18.36	0.00	0.00	
11:00	-0.03	0.00	0.31	0.31	487.94	0.31	130277.44	0.00	0.00	0.00	0.00	2.32	0.00	2.32	21.62	20.73	0.00	0.00	
12:00	-0.03	0.00	0.31	0.31	487.95	0.31	130245.62	0.03	0.00	0.00	0.00	1.73	0.00	1.73	10.55	18.07	0.00	0.00	
13:00	-0.03	0.00	0.31	0.31	487.96	0.31	130245.92	0.05	0.00	0.00	0.00	1.75	0.00	1.75	10.14	17.90	0.00	0.00	
14:00	-0.03	0.00	0.31	0.31	487.97	0.31	130245.92	0.06	0.00	0.00	0.00	1.70	0.00	1.70	18.78	17.49	0.00	0.00	
15:00	-0.03	0.00	0.31	0.31	487.98	0.31	130245.92	0.07	0.00	0.00	0.00	1.75	0.00	1.75	19.05	17.81	0.00	0.00	
16:00	-0.03	0.00	0.47	0.47	487.99	0.47	93180.10	0.05	0.00	0.00	0.00	1.73	0.00	1.73	18.74	17.50	0.00	0.00	
17:00	-0.03	0.00	0.50	0.50	488.00	0.50	81403.70	0.06	0.00	0.00	0.00	1.71	0.00	1.71	18.30	17.07	0.00	0.00	
18:00	-0.03	0.00	0.50	0.50	488.01	0.50	81403.70	0.06	0.00	0.00	0.00	1.61	0.00	1.61	18.50	16.81	0.00	0.00	
19:00	-0.03	0.00	0.50	0.50	488.02	0.50	81403.70	0.06	0.00	0.00	0.00	1.60	0.00	1.60	18.11	16.81	0.00	0.00	
20:00	-0.03	0.00	0.50	0.50	488.03	0.50	81403.70	0.05	0.00	0.00	0.00	1.73	0.00	1.73	19.81	18.20	0.00	0.00	
21:00	-0.03	0.00	0.50	0.50	488.04	0.50	81403.70	0.04	0.00	0.00	0.00	1.77	0.00	1.77	20.70	19.37	0.00	0.00	
22:00	-0.03	0.00	0.50	0.50	488.05	0.50	81403.70	0.04	0.00	0.00	0.00	1.87	0.00	1.87	20.63	19.40	0.00	0.00	
0:00	-0.03	0.00	0.50	0.50	488.06	0.50	81403.70	0.04	0.00	0.00	0.00	1.82	0.00	1.82	21.39	20.08	0.00	0.00	
1:00	-0.03	0.00	0.50	0.50	488.07	0.50	81403.70	0.05	0.00	0.00	0.00	1.76	0.00	1.76	21.09	19.72	0.00	0.00	
2:00	-0.03	0.00	0.50	0.50	488.08	0.50	81403.70	0.05	0.00	0.00	0.00	1.76	0.00	1.76	20.53	19.20	0.00	0.00	
3:00	-0.03	0.00	0.50	0.50	488.09	0.50	81403.70	0.05	0.00	0.00	0.00	1.78	0.00	1.78	20.32	19.00	0.00	0.00	
4:00	-0.03	0.00	0.50	0.50	488.10	0.50	81403.70	0.05	0.00	0.00	0.00	1.83	0.00	1.83	21.42	20.11	0.00	0.00	
5:00	-0.03	0.00	0.50	0.50	488.11	0.50	81403.70	0.05	0.00	0.00	0.00	1.82	0.00	1.82	21.48	20.18	0.00	0.00	
6:00	-0.03	0.00	0.50	0.50	488.12	0.50	81403.70	0.03	0.00	0.00	0.00	1.72	0.00	1.72	20.53	19.16	0.00	0.00	
7:00	-0.03	0.00	0.50	0.50	488.13	0.50	81403.70	0.04	0.00	0.00	0.00	1.75	0.00	1.75	20.25	18.93	0.00	0.00	

Comment: Cogen down on 5/17/13 from 7:30 am - 7:30 am - turbine hot section damage, a total of 24 hrs. Nebraska running on 5/17/13 from 7:30 am - 7:30 am, a total of 24 hrs.

Plot-0





ON Name	Description	Attribute	Treatment	Ruler Time	Ruler Value	Current Value	Unit	Filter	Time Offset	Form
931AIC1111A.NOX	B&W SCR INLET NOX	MV	Mom	06:00 2013-05-17	0.22	69.34	PPM			
931AIC1111C.CO	B&W BLR STACK RAW CO	MV	Mom	06:00 2013-05-17	0.14	20.55	PPM			
931AIC1111B.O2	B&W BLR RAW O2%	MV	Mean	06:00 2013-05-17	20.65	14.71	%			
931AIC1111D.NOX	B&W BLR STACK NOX	MV	Mean	06:00 2013-05-17	0.08	10.85	PPM			
931-AIC-1111.INCAL	RSMT CEMS IN CAL	MV	Mom	06:00 2013-05-17	0	0				Current Time
931-aic-1111.lrb	RSMT CEMS TROUBLE	MV	Mom	06:00 2013-05-17	0	0				Save Trend...

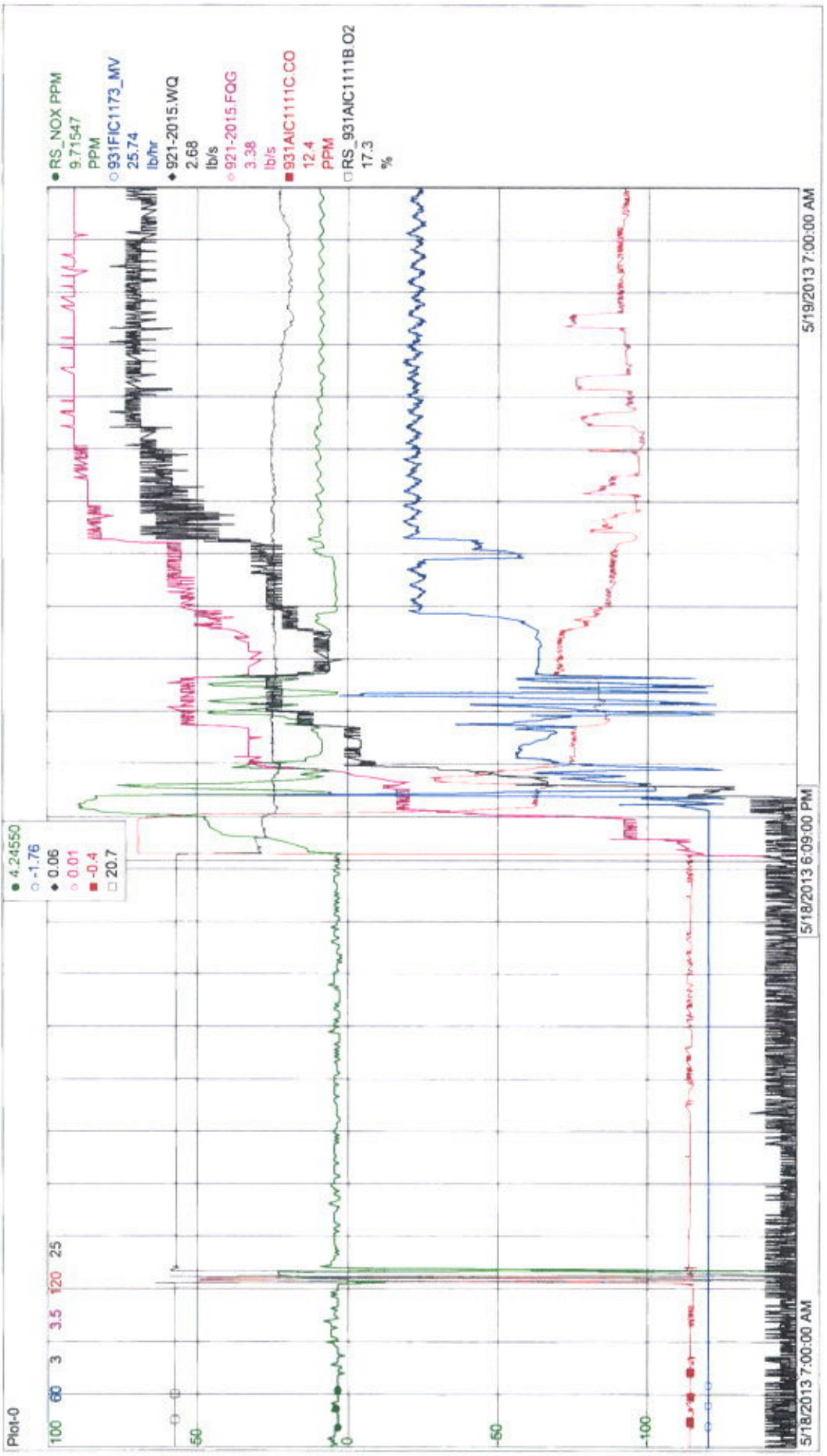
D1 30 minutes	D2 1 hour	D3 8 hours	D4 1 day	D5 10 days
D6 Positioning...	D7 Trace Control...	D8 Analyze...	D9 Trace Config...	D10 Extended Config...













ION Name	Description	Attribute	Treatment	Ruler Time	Ruler Value	Current Value	Unit	Filter	Time Offset	Form
931AIC1111A	B&W SCR INLET NOX	MV	Mom	19:20 2013-05-18	83.82	70.56	PPM			
931AIC1111C	B&W BLR STACK RAW CO	MV	Mom	19:20 2013-05-18	28.84	20.00	PPM			
931AIC1111B	B&W BLR RAW O2%	MV	Mean	19:20 2013-05-18	17.43	14.71	%			
931AIC1111D	B&W BLR STACK NOX	MV	Mean	19:20 2013-05-18	50.74	10.88	PPM			
931-AIC-1111.INCAL	RSMT CEMS IN CAL	MV	Mom	19:20 2013-05-18	0	0				
931-aic-1111.trb	RSMT CEMS TROUBLE	MV	Mom	19:20 2013-05-18	0	0				

D1	30 minutes	D2	1 hour	D3	8 hours	D4	1 day	D5	10 days
D6	Positioning...	D7	Trace Control...	D8	Analyze...	D9	Trace Config...	D10	Extended Config...





DAILY ENVIRONMENTAL REPORT

5/18/2013 7:00

5/20/2013 7:00

5/18/2013 7:00

Time	Dust burner gas flow MCCFH	Turbine gas flow MCCFH	SCR Temperature °C	SCR feed NOx ppm	Ammonia Usage lb/h	NO/NOx molar ratio	Injection steam rate lb/h	Steam to fuel ratio	NOx lb/h	Stack O2 %	Stack CO ppm	Stack CO 15% O2 ppm	Stack NOx ppm	3h Running Average NOx	Nebraska O2 %	Nebraska NOx %	Nebraska NOx (to 3% O2)	Daily Av Cogen NOx lb/h	Daily Av Cogen NOx B 50	Daily Av Cogen NOx lb/h	Daily Av Cogen NOx B 50	
																						CO
8:00	0.10	276.50	624.17	70.55	25.74	0.08	2.83	0.78	9.48	17.11	19.67	12.35	8.31	8.13	23.54	-1.59						
9:00	0.14	276.76	624.38	71.28	25.65	0.08	2.00	0.76	9.78	17.52	19.57	12.02	8.89	8.32	23.52	-1.00						
10:00	2.18	277.79	628.40	69.28	26.72	0.08	2.87	0.79	9.69	17.21	23.45	14.78	9.34	8.45	23.53	-1.58						
11:00	-0.01	277.78	623.82	71.58	25.47	0.04	2.68	0.70	10.12	17.61	19.30	12.18	10.02	8.68	23.57	-2.51						
12:00	-0.01	279.16	623.83	71.19	28.82	1.00	2.09	0.70	7.24	17.52	19.30	12.03	7.21	8.88	23.58	-2.30						
13:00	-0.01	280.64	623.71	70.32	26.47	0.07	2.74	0.80	8.88	17.52	19.16	12.06	8.48	8.57	23.56	-2.26						
14:00	-0.01	280.73	623.79	71.11	27.11	0.09	2.71	0.79	7.87	17.52	19.05	11.83	7.45	7.78	23.58	-2.53						
15:00	-0.01	280.94	623.88	69.06	26.69	1.76	2.72	0.80	8.78	17.52	19.78	16.80	8.50	8.21	23.58	-2.72						
16:00	-0.01	279.72	623.90	69.97	26.84	1.01	2.70	0.79	8.15	17.60	19.70	12.29	7.53	8.83	23.58	-2.00						
17:00	-0.01	279.60	624.04	71.14	26.84	0.09	2.71	0.79	8.12	17.52	19.29	12.08	7.86	8.10	23.63	-2.35						
18:00	-0.01	278.25	624.12	71.45	26.87	0.00	2.87	0.70	7.79	17.52	19.73	12.17	7.84	7.81	23.63	-3.81						
19:00	-0.01	277.49	624.20	71.76	26.91	0.08	2.87	0.70	7.79	17.52	19.73	12.17	7.84	7.81	23.63	-3.81						
20:00	-0.01	277.62	624.29	71.10	27.11	0.09	2.87	0.79	7.48	14.86	19.24	12.06	7.43	7.71	23.73	-3.41						
21:00	-0.01	279.45	624.37	70.71	27.03	1.00	2.71	0.70	7.28	14.81	19.33	12.12	7.09	7.33	23.74	-3.33						
22:00	-0.01	279.84	624.45	70.33	22.08	0.82	2.89	0.79	7.85	14.80	19.24	12.13	7.64	7.23	23.72	-2.55						
23:00	-0.01	280.18	624.53	68.74	20.77	0.79	2.71	0.78	7.95	14.87	19.47	12.28	7.73	7.48	23.73	-2.17						
0:00	1.79	279.02	626.86	67.50	18.45	0.72	2.80	0.79	8.09	15.07	23.97	15.20	8.35	7.81	23.74	-2.25						
1:00	0.07	278.28	623.05	69.84	18.42	0.70	2.86	0.70	8.77	14.95	19.80	12.30	8.60	8.23	23.78	-2.38						
2:00	1.81	280.35	626.28	68.82	18.42	0.70	2.71	0.70	8.89	14.74	24.19	15.27	8.57	8.51	23.77	-2.38						
3:00	0.04	281.02	626.22	70.39	18.47	0.69	2.71	0.70	9.09	14.72	19.87	12.47	8.82	8.68	23.83	-2.38						
4:00	0.04	278.47	625.11	70.52	18.48	0.69	2.85	0.70	9.11	14.71	19.87	12.40	8.89	8.78	23.86	-2.38						
5:00	0.04	277.79	624.58	70.52	18.49	0.70	2.66	0.79	9.84	14.72	19.90	12.42	8.84	8.85	23.89	-2.38						
6:00	0.04	277.48	623.84	70.20	18.48	0.70	2.87	0.78	9.84	14.73	20.00	12.39	8.83	8.86	23.92	-2.38						
7:00	0.04	279.45	624.11	70.36	18.34	0.69	2.70	0.70	9.21	14.72	20.02	12.54	9.06	8.81	23.98	-2.15						

Comment:



DRY SHIFT OPERATOR NIGHT SHIFT OPERATOR

NAME: *Reis*

# OFFICIAL DAILY COGENERATION LOG

ARICAL PUMPS		STEAM & WATER READINGS		GAS & ELECTRIC READING		BOILER TEST RESULTS							
Level	Feed Rate ml/min	NEBRASKA	PERMATE H <sub>2</sub> O	CONCENTRATE H <sub>2</sub> O	LP	HP	SCG LP	TURBINE	MAXON	BURNER	HEBRASKA	THE LAWATS	
Steam 19 ml/min		5545	825	5542	2405	627	1601	250	050	210	160	2015	
Control 3.3 ml/min		8540	323	5320	887	62	3577	175	33	75	110	470	
Polymer 8.9 ml/min												3065	
Coatex (as feeder)												5947	
TURBINE		AMMONIA DELIVERY		NEBRASKA WARM STORAGE CHECK		NEBRASKA ONLINE TIME		FROM		TO			
FSR	%	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	
Inlet Temp	F	54	61	60	64	64	61	61.5	63.0	65.6	69.1	63.1	
Humidity	%	54	90	35	3.8	4.0	4.4	4.9	5.6	5.5	5.5	5.4	
Vibration (Max)	u/s	3.1	3.2	3.1	3.2	3.2	3.2	3.1	3.1	3.2	3.2	3.2	
Steam Injection	#/SEC	2.0	2.0	2.0	2.0	2.0	2.0	2.0	2.0	2.0	2.0	2.0	
Turbine L.O. Level	%	100	100	100	100	100	100	100	100	100	100	100	
T4B	F	142	140	140	140	140	140	140	140	140	140	140	
GENERATOR		BATTERIES		AIR INLET DIFF		L.O. DIFFERENTIAL		V HP RECOURSE		V HP RECOURSE		V HP RECOURSE	
Gen. Bearing Drain	F	15.3	15.5	15.5	15.6	15.7	15.7	15.7	15.7	15.7	15.7	15.7	
L.O. Supply	F	12.4	12.8	12.8	12.9	12.9	12.9	12.9	12.9	12.9	12.9	12.9	
Gen. Vibration (Max)	IPS	3.8	3.3	4.2	4.1	4.1	3.8	4.1	3.9	3.7	3.6	3.5	
Tie Line	MW	13.5	15.4	15.5	12.3	12.5	13.5	13.5	13.5	13.4	13.5	13.6	
COGEN BOILER		FIELD		V FIELD		V FIELD		V FIELD		V FIELD		V FIELD	
450 Header Temp	F	710	711	710	711	711	711	710	711	711	710	710	
HP Drum Level	IN	1.1	1.1	1.1	1.1	1.1	1.1	1.0	0.9	0.9	1.1	1.0	
LP Drum Level	IN	1.1	1.1	1.1	1.1	1.1	1.1	1.0	0.9	0.9	1.1	1.0	
HP Drum Pressure	PSI	47.7	47.4	47.4	47.4	47.4	47.4	47.4	47.4	47.4	47.4	47.4	
LP Drum Pressure	PSI	12.1	12.2	12.2	12.2	12.2	12.2	12.2	12.2	12.2	12.2	12.2	
CO	PPM	19.4	30.7	18.7	19.9	19.2	19.0	19.3	19.4	19.4	19.4	19.4	
NOX	PPM	9.8	9.5	3.4	7.6	7.5	8.0	8.3	7.4	8.9	8.5	9.1	
Hot Well Level	%	12.1	12.5	12.7	12.4	12.4	12.3	12.3	12.3	12.3	12.3	12.3	
COMPRESSORS		1150 SET POINT		1103 B SET POINT		1150 SET POINT		1103 B SET POINT		1103 B SET POINT		1103 B SET POINT	
Filter Separator	PSI	2.3	2.5	2.5	2.7	2.7	2.7	2.3	2.3	2.3	2.4	2.3	
Gas Receiver	PSI	42.0	42.0	42.0	42.0	42.0	42.0	42.0	42.0	42.0	42.0	42.0	
NEBRASKA BOILER		DRUM LEVEL		DRUM PRESSURE		STEAM FLOW		STEAM TEMP		NOX		D2	
Drum Level	IN	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	
Drum Pressure	PSI												
Steam Flow	#/HR												
Steam Temp	F												
NOX	PPM												
D2	%												
ON LINE TURBINE WATER WASH		YES		NO		CONDUCTIVITY MHOS		BOILER FEED WATER PUMP OPERATION		NO. 1		YES	
BOILER FEEDWATER		pH 8.75 - 9.5		Conductivity < 5mmhos		Silica < 20 ppb		R.O.		Feed 105 < 1000 ppm		Permeate TDS < 10 ppm	
CONDENSATE		pH (Feed 7.5)		HP-pH 8.5 - 9.5		Conductivity < 20mmhos		LP-pH 8.5 - 9.5		Conductivity < 20mmhos		pH 9.5 - 10.5	
MIXED BED		Iron ppm		Phosphate 5-15 ppm		Silica < 5 ppm		Iron ppm		Conductivity < 1000 ppm		pH 6.0 - 7.5	
SOFTNER		Hardness < 1.0 ppm		Running (1 or 2)		NEBRASKA		pH 9.5 - 10.5		Conductivity 75 - 200		Silica	
STEAM TEST		Phosphate 3-25 ppm		Silica < 20 ppb		PV NO.2		Molybdate > 200 ppm		NOTES:			

4-248 800-3011 - 801E W04 1020

Huenebma Paper Mill


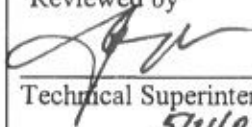
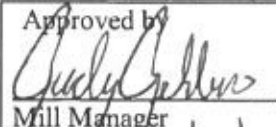
SAFETY IS ALWAYS NO. 1

DATE: 5-19-13



## Hueneme Mill Environmental Incident Report

Shaded section to be completed by the EMR

Name of Incident B&W boiler Start-up issues		Incident Date 5/18/13	
Exact Location Incident Cogen			
Reported By C. Wilson	Estimated Start and Stop Times of Incident: 1800	Possible Cause: Pressure regulator - tripping ammonia flow. O2 drift - unknown	
Incident Type: <input type="checkbox"/> Spill Internal <input type="checkbox"/> Improper Waste Disposal <input type="checkbox"/> Spill External <input type="checkbox"/> Near miss or below spill release guidelines <input checked="" type="checkbox"/> Air Emission <input type="checkbox"/> Other _____	Released To <input type="checkbox"/> Storm Water System <input type="checkbox"/> Secondary Containment <input checked="" type="checkbox"/> Process Sewer <input checked="" type="checkbox"/> X Air <input type="checkbox"/> Ground (External) <input type="checkbox"/> Ground (Inside Mill Property) <input type="checkbox"/> Near Miss <input type="checkbox"/> Other _____		
Detailed Description of Event On 18 Apr 2013- after Cogen plant start-up- after permissives met for DCS control to inject NH3 into SCR, the pressure regulator was tripping solenoid valve on high pressure.  Troubleshooted and decided- issue rested with pressure regulator- could not control to setpoint of 20-30 psig range.  O2 issue investigated but did not find air leak. Cleaned lines.  (if required use additional paper and attach)			
Estimated Amount Released		pH	CONSISTENCY (%)
<input type="checkbox"/> _____ Gallons <input type="checkbox"/> _____ Pounds <input type="checkbox"/> Other _____			
List Any External Emergency Clean Up Personnel Contacted N/A		List Any External Agencies Contacted (Agency, person and time of call.) APCD @ 2045	
List Hueneme Personnel Contacted (Foreman, Mill Manager, etc.) Lars Gustavson, Rudy Rehbein, Robyn Lebrilla, Victor Kumpera		Any Acute or Chronic Health Risks (refer to MSDS) N/A	
Describe Any Emergency Response Actions N/A			
Suggestions to Prevent Reoccurrence			Estimated Completion Date
1. install new pressure regulator			1. 5/20/13
2.			2.
3.			3.
Root Cause after investigation  Failed ammonia pressure regulator		Severity Level (level 1 and 2 must be tracked through SHIMS) <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4	
Investigated By: Charlie Wilson		Investigated Date 5/18/13	
Follow Up		By When	Completion Date
Issued By  Department Manager 5/21/13	Reviewed by  Technical Superintendent 5/21/2013	Approved by  Mill Manager 5/21/2013	

Print Time: 5/18/2013 9:08:26 AM

Note: This document is valid for only ONE week after print time!

# NEW INDY CONTAINERBOARD

June 28, 2013

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

Subject: PI data loss due to maintenance on PI-server

Dear Mr. Olson:

This letter is a follow up on the calls made to the VCAPCD Breakdown Center Hotline on June 27, 2013 by Victor Kumpera.

The New-Indy Containerboard was performing maintenance on the PI server and the relocation of the server from the IP to the New-Indy domain June 26, 2013 morning. The maintenance was part of the IP/New-Indy network separation project. The server had to be shut down and rebooted to allow for a network address change. During the maintenance process the PI emission data from 8:12 a.m. – 9:39 a.m. was lost. The turbine was in a start-up mode and the 3-h emission start-up grace period at that time.

The Daily Emission Sheets, PI trends, DCS trends have been provided for your review. If you have any questions or require any additional information, please call me at (805) 271-7279.

Sincerely,



Vitezslav Kumpera  
Technical Manager

## NEW INDY OXNARD, LLC

5936 PERKINS ROAD • OXNARD, CALIFORNIA 93033 • WWW.NEWINDYCONTAINERBOARD.COM  
PHONE (805) 986 3881 • FAX (805) 488 5186



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:

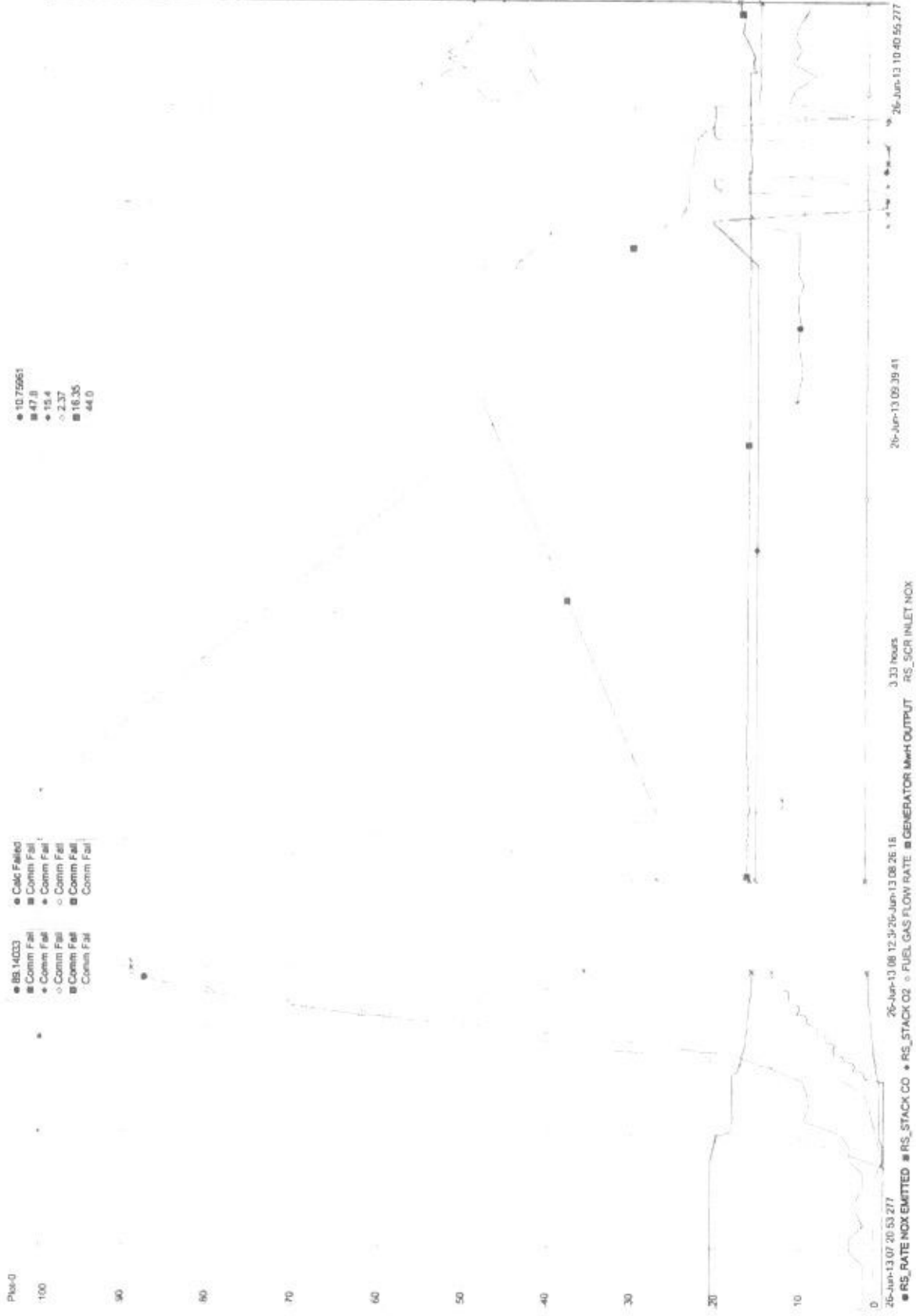
Lyle Olson  
Air Quality Engineer  
Ventura County Air Pollution Control District  
669 County Square Drive  
Ventura, CA 93003

### 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.

<p>Signature and Title of Responsible Official:</p> <p>Signature: <u></u></p> <p>Title: <u>Technical Manager</u></p>	<p>Date: 6/28/2013</p>
---	------------------------





Plus-0

100

90

80

70

60

50

40

30

20

10

0

- 88.14033
- Comm Fail
- Comm Fail
- Comm Fail
- Comm Fail
- Comm Fail
- Comm Fail
- Comm Fail
- Comm Fail

- 10.75961
- 47.8
- 15.4
- 2.37
- 16.35
- 44.0

- RS\_NOX\_PPM
- 9.54819
- PPM
- RS\_931AIC1111C\_CO
- Comm Fail
- PPM
- RS\_931AIC1111B\_O2
- Comm Fail
- %
- 921-2015\_FOG
- Comm Fail
- 921-2015\_DWATT
- 17.78
- MW
- RS\_931AIC1111A\_NOX
- Comm Fail
- PPM

26-Jun-13 07:20:53:277

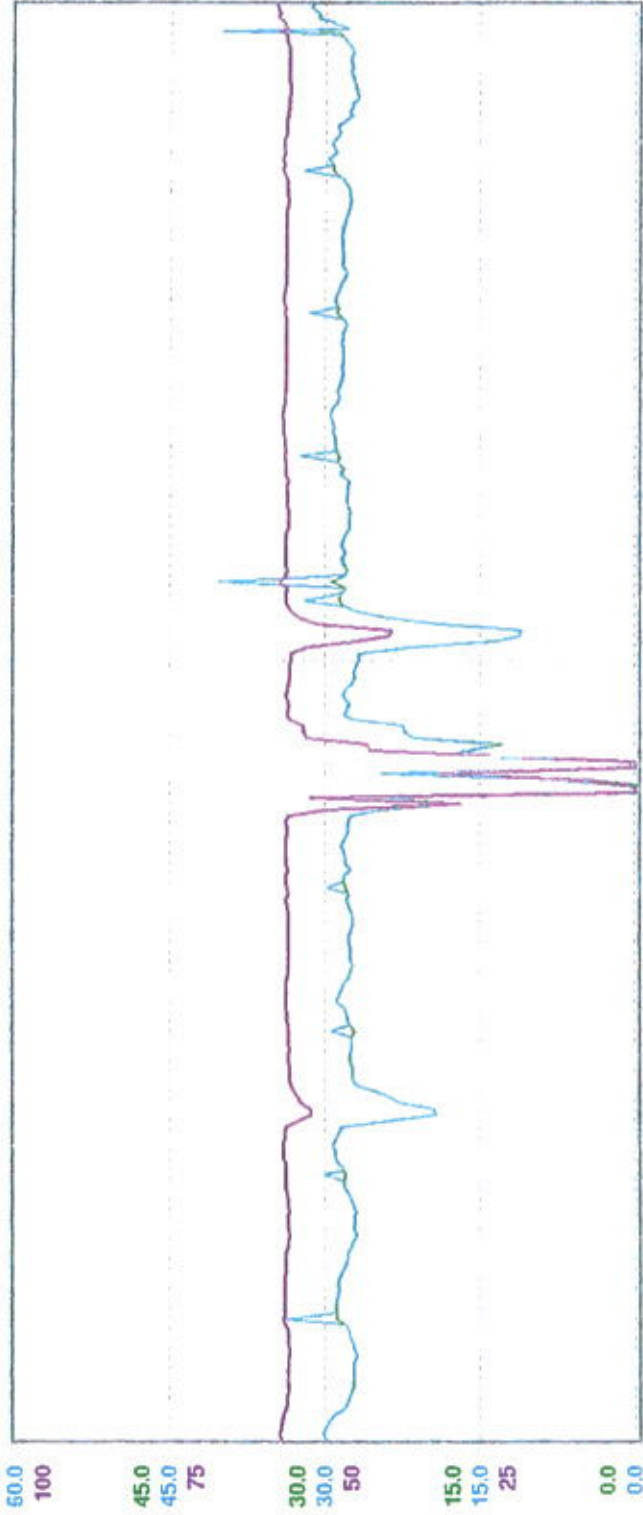
26-Jun-13 08:12:31-26-Jun-13 08:26:15

3.33 hours

26-Jun-13 09:39:41

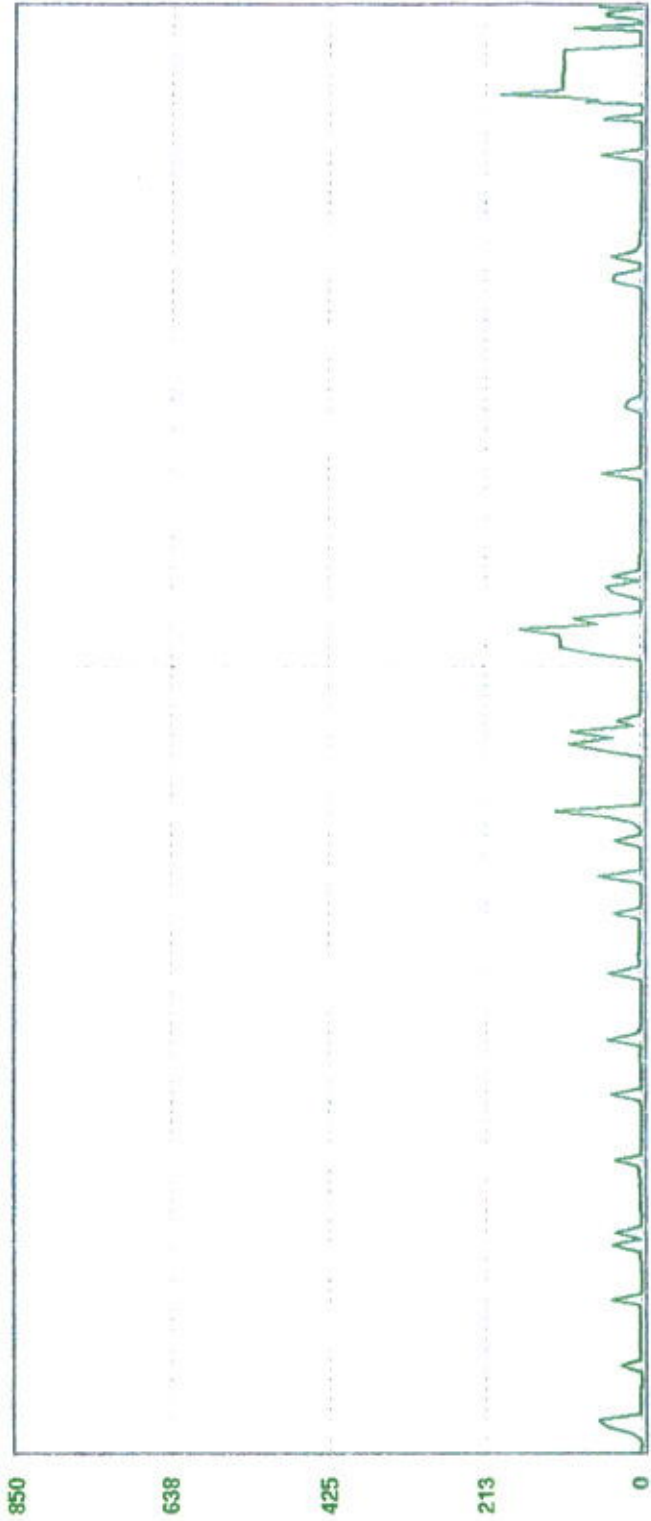
26-Jun-13 10:40:55:277

■ RS\_RATE NOX EMITTED ■ RS\_STACK CO ● RS\_STACK O2 ○ FUEL GAS FLOW RATE ■ GENERATOR Mwh OUTPUT ■ RS\_SCR INLET NOX



ON/Name	Description	Attribute	Treatment	Ruler Time	Ruler Value	Current Value	Unit	Filter	Time Offset	Form
931FIC1173	NH3 FLOW	MV	Mean	09:00 2013-06-26	16.2	28.6	PPH			
931FIC1173	NH3 FLOW	SP	Mean	09:00 2013-06-26	18.4	28.6	PPH			
931FIC1173	NH3 FLOW	OUT	Mean	09:00 2013-06-26	26.0	56.5	%			
				***						
				***						
D1	30 minutes	D2	1 hour	D3	8 hours	D4	1 day	D5	10 days	
D6	Positioning...	D7	Trace Control...	D8	Analyze...	D9	Trace Config...	D10	Extended Config...	

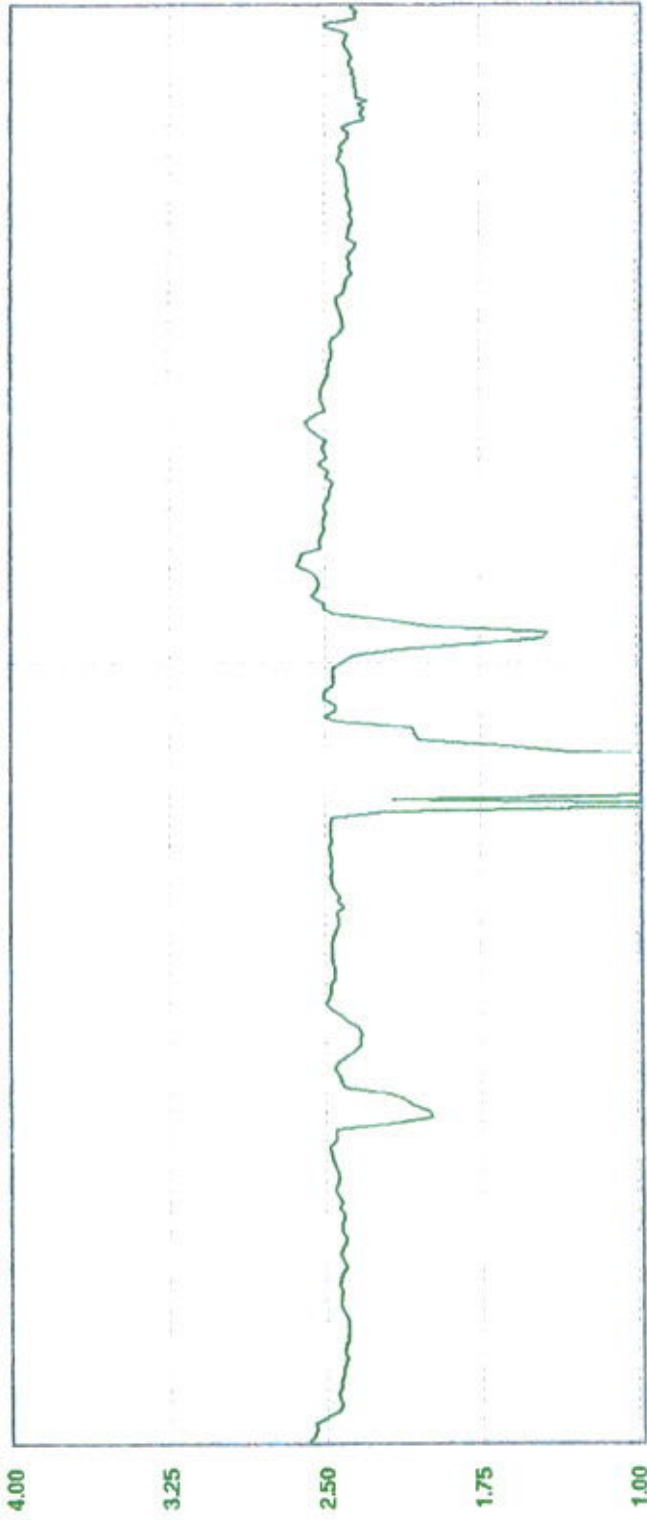




ON/Name	Description	Attribute	Treatment	Ruler Time	Ruler Value	Current Value	Unit	Filter	Time Offset	Form
931FI1102A.FT	NAT GAS TO BURNER	MV	Mean	09:00 2013-08-26	1	1	CFM			
D1 30 minutes	D2 1 hour	D3 8 hours	D4 1 day	D5 10 days						
D6 Positioning...	D7 Trace Control...	D8 Analyze...	D9 Trace Config...	D10 Extended Config...						



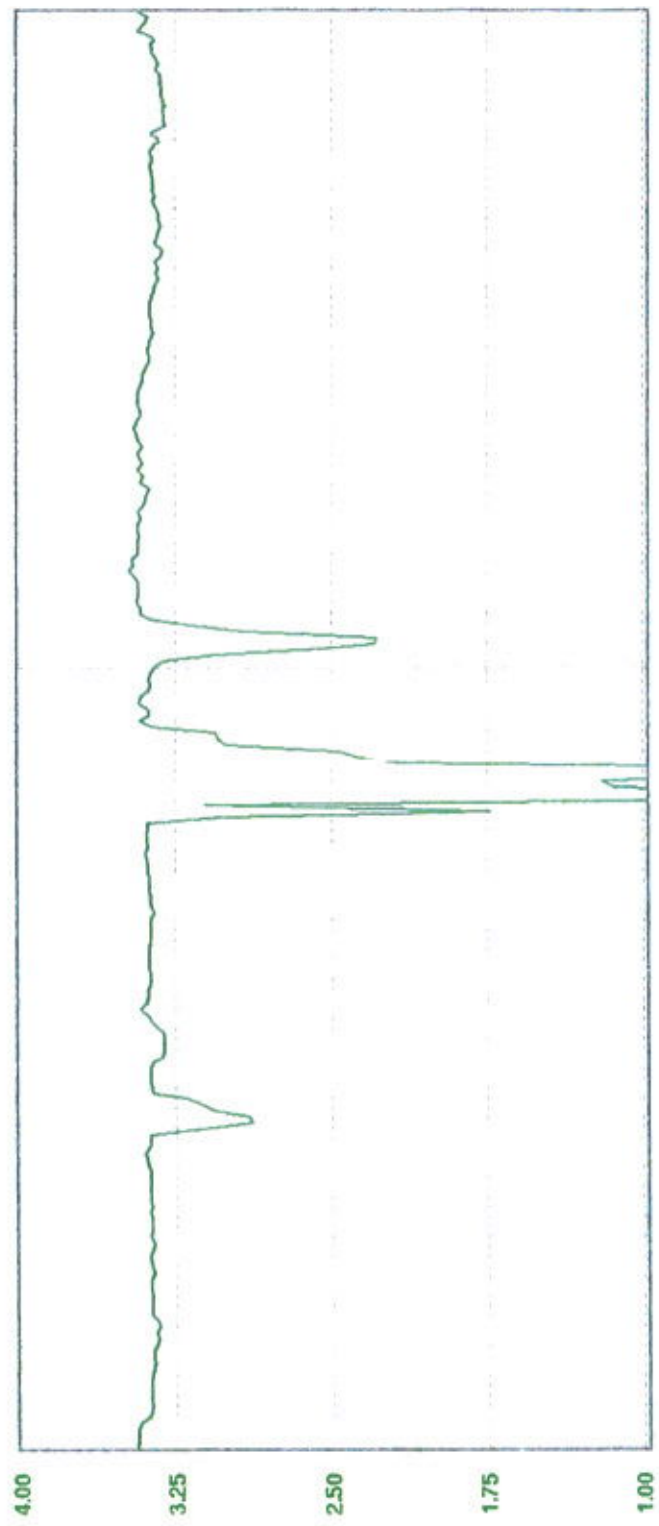
< << >> >  
 Current Time  
 Save Trend...  
 Hide Table



ON Name	Description	Attribute	Treatment	Ruler Time	Ruler Value	Current Value	Unit	Filter	Time Offset	Form
921-2015.WQ	STM INJ FLOW	MV	Mean	09:00 2013-06-26	0.08	2.38	PPS			
				***						
				***						
				***						
				***						
				***						
D1	30 minutes	D2	1 hour	D3	8 hours	D4	1 day	D5	10 days	
D6	Positioning...	D7	Trace Control...	D8	Analyze...	D9	Trace Config...	D10	Extended Config...	








ON/Name	Description	Attribute	Treatment	Ruler Time	Ruler Value	Current Value	Unit	Filter	Time Offset	Form
921-2015.FQG	FUEL GAS FLOW	MV	Mean	09:00 2013-06-26	2.16	3.33	PPS			
				***						
				***						
				***						
				***						

D1 30 minutes    D2 1 hour    D3 8 hours    D4 1 day    D5 10 days  
 D6 Positioning...    D7 Trace Control...    D8 Analyze...    D9 Trace Config...    D10 Extended Config...



2013 - 2014  
Annual Title V Compliance Certification  
New-Indy Oxnard, LLC  
May 1, 2014

Section 5      Supporting Records

**NEW**  **INDY**  
**CONTAINERBOARD**

April 10, 2013

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

Subject: Nebraska Start up - April 5, 2013


Dear Mr. Olson:

This letter is a follow up on the call made by Charlie Wilson to the VCAPCD Breakdown Center Hotline on April 5, 2013 at about 7:00 AM.

On April 5, 2013, the Nebraska boiler had maintenance service and was started up in preparation for the planned repair of the B&W boiler low temperature economizer tube. However, the attempts to start up Nebraska boiler failed. Nebraska attempted to start up from 7:07 AM – 7:27 AM and from 11:09 AM – 11:49 AM, a total of 1 hour.

On April 6, 2013, the cogen was shut down for repair of the B&W boiler economizer tube leak. The Daily Emission Sheet, PI and DCS trends and cogen logs have been provided for your review. If you have any questions or require any additional information, please call me at (805) 271-7284.

Sincerely,

  
Robyn Lebrilla  
Environmental Engineer

**NEW INDY OXNARD, LLC**

5936 PERKINS ROAD • OXNARD, CALIFORNIA 93033 • WWW.NEWINDYCONTAINERBOARD.COM  
PHONE (805) 986-3881 • FAX (805) 488-5186



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:

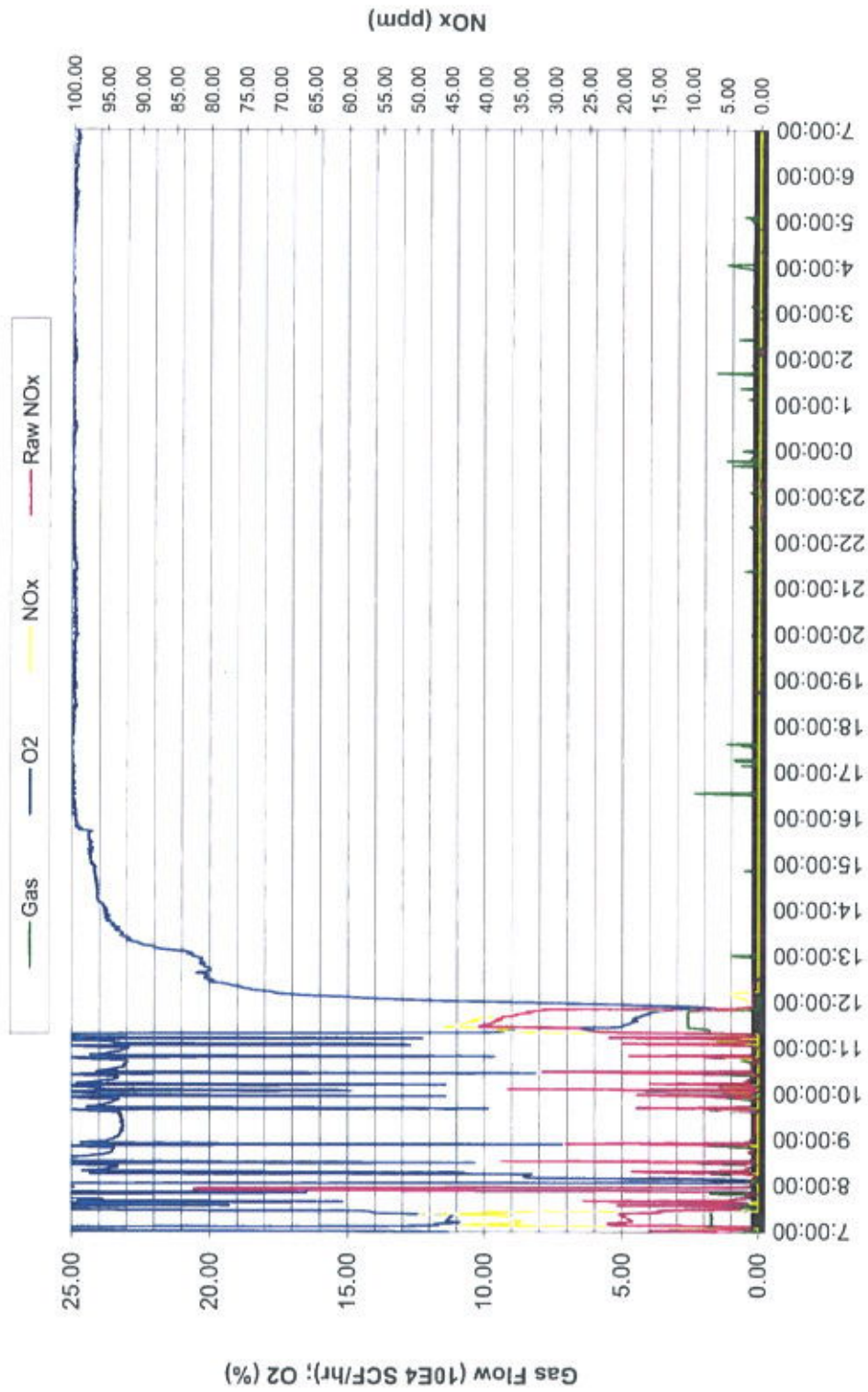
Lyle Olson  
Air Quality Engineer  
Ventura County Air Pollution Control District  
669 County Square Drive  
Ventura, CA 93003

### 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.

<p>Signature and Title of Responsible Official:</p> <p>Signature: <u></u></p> <p>Title: <u>Technical Superintendent</u></p>	<p>Date:</p> <p><u>4/10/2013</u></p>
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# Nebraska Boiler - Daily Environmental Report



Period: 4/5/2013 - 4/6/2013

**DAILY ENVIRONMENTAL REPORT**

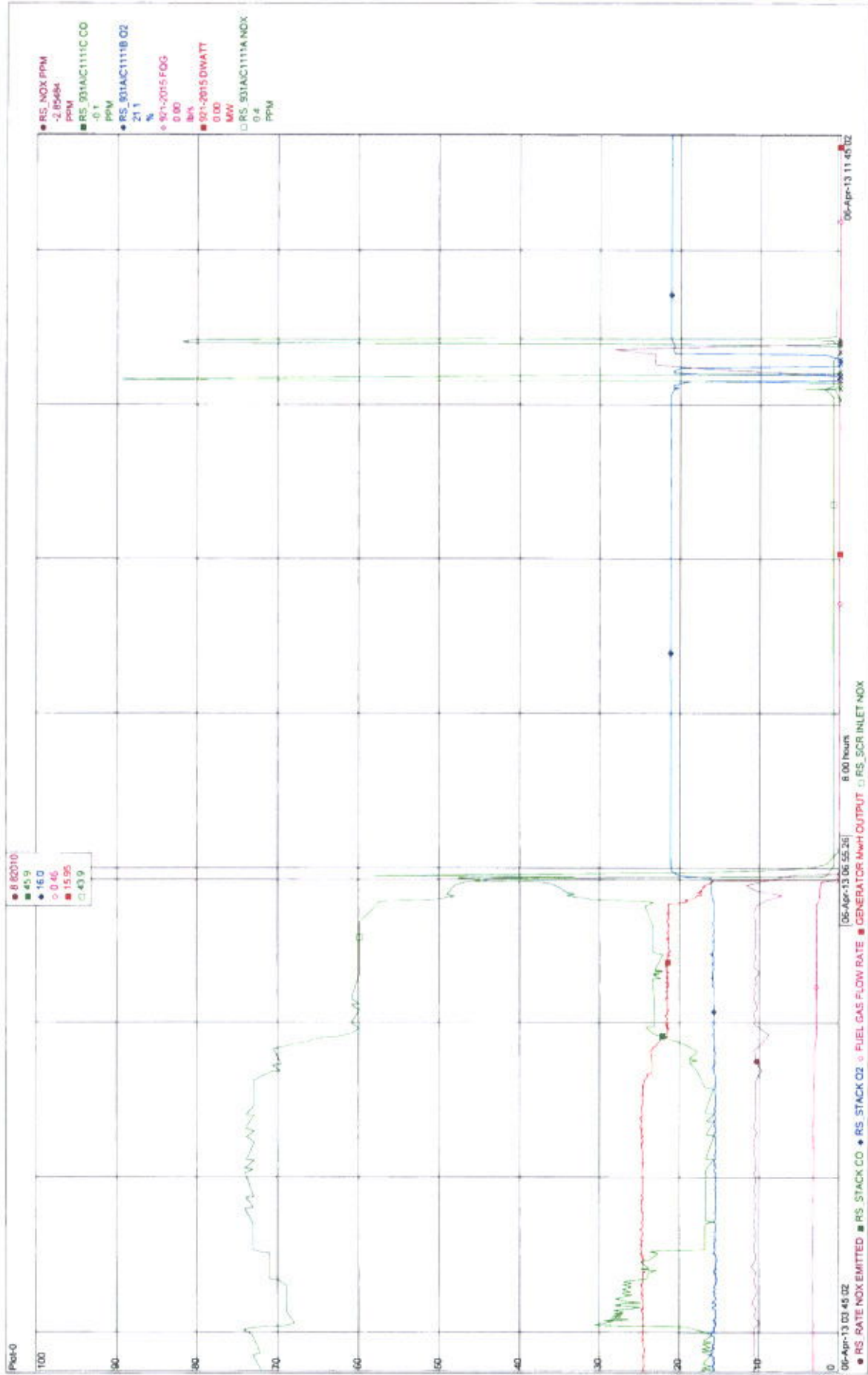
4/5/2013 7:00

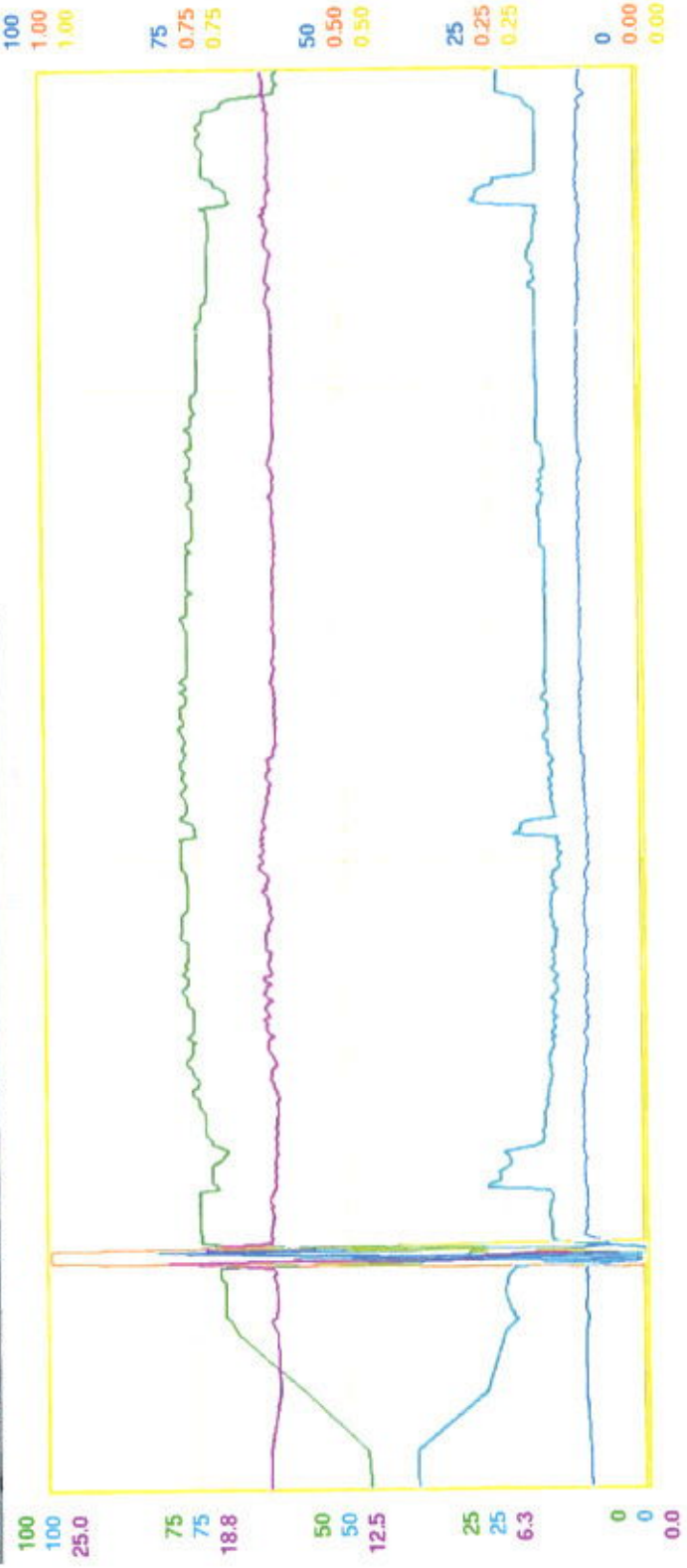
4/5/2013 7:00

4/5/2013 7:00

Time	Duct burner gas flow MCF/Hr	Turbine gas flow MCF/Hr	SICR Temperature %	SICR inlet MCH ppm	Annual Usage Btu	NH3 NOx mole ratio	Injection steam rate lb/s	Steam to boilers lb/hr	NOx Btu	Stack O2 %	Stack CO ppm	Stack NOx ppm	3h Average NOx	Hebraska CO %	Hebraska NOx %	Nebraska Corrected NOx (to 3% O2)	Daily Av Cogp Neb	
																	NOx Btu	CO lb/hr
8:00	16.64	233.95	622.74	57.10	17.88	0.92	1.07	0.65	9.77	15.38	28.42	16.64	10.53	19.50	14.65		10.10	10.50
9:00	7.30	259.11	623.62	69.42	23.91	0.98	2.20	0.69	10.49	15.47	25.46	16.64	10.56	19.29	2.84		10.10	10.50
10:00	8.46	261.74	623.23	79.14	25.02	0.90	2.23	0.70	10.40	15.51	24.94	16.64	10.48	22.90	1.50		10.10	10.50
11:00	2.03	262.77	621.40	74.95	25.91	0.95	2.23	0.70	10.36	15.04	17.41	16.52	10.80	22.51	2.98		10.10	10.50
12:00	4.14	261.13	622.68	72.82	25.62	0.98	2.21	0.69	10.26	15.53	22.63	16.63	10.43	10.67	18.93	33.10	11.60	11.85
13:00	0.23	250.94	610.19	73.80	25.47	0.96	2.18	0.69	10.16	15.41	17.62	16.38	10.55	18.70	0.19		11.60	11.85
14:00	0.66	260.54	619.08	75.54	25.99	0.98	2.17	0.69	10.16	15.58	16.93	16.54	10.51	22.80	0.28		11.60	11.85
15:00	0.06	260.88	610.27	76.27	26.22	0.98	2.19	0.69	10.12	15.77	16.71	16.68	10.47	24.08	-0.81		11.60	11.85
16:00	0.27	261.23	619.48	76.93	26.44	0.97	2.21	0.69	10.18	15.70	16.51	16.52	10.42	24.46	-1.33		11.60	11.85
17:00	0.07	261.23	619.63	76.73	26.13	0.96	2.19	0.69	10.12	15.76	16.77	16.68	10.47	24.64	-1.15		11.60	11.85
18:00	1.84	261.23	621.61	76.57	26.26	0.96	2.20	0.69	10.21	15.88	18.80	11.20	10.47	25.00	-0.88		11.60	11.85
19:00	0.03	261.40	619.71	77.09	26.10	0.95	2.21	0.69	10.15	15.58	16.60	10.48	10.48	24.93	-0.91		11.60	11.85
20:00	0.03	261.23	619.58	76.90	26.06	0.95	2.21	0.69	10.16	15.36	16.73	10.49	10.48	24.82	-1.13		11.60	11.85
21:00	0.03	261.60	619.41	76.41	26.07	0.94	2.21	0.69	10.19	15.40	16.76	10.51	10.48	24.80	-1.13		11.60	11.85
22:00	0.63	261.44	619.28	76.26	26.09	0.94	2.22	0.69	10.15	15.40	16.70	10.48	10.48	24.81	-1.19		11.60	11.85
23:00	0.03	261.23	619.12	75.52	25.80	0.90	2.21	0.69	10.18	15.37	17.29	10.25	10.51	24.95	-0.71		11.60	11.85
0:00	0.03	261.23	618.97	75.58	25.88	0.90	2.21	0.69	10.13	15.44	17.18	10.08	10.48	24.99	-0.86		11.60	11.85
1:00	0.03	261.74	618.28	74.09	25.41	0.95	2.21	0.69	10.15	15.30	17.85	10.44	10.59	24.99	-1.11		11.60	11.85
2:00	0.03	261.05	618.78	75.07	25.73	0.96	2.21	0.69	10.14	15.36	17.99	10.82	10.48	24.90	-1.09		11.60	11.85
3:00	0.03	261.23	618.80	72.75	24.74	0.95	2.20	0.69	10.14	15.51	18.68	10.48	10.48	24.87	-0.71		11.60	11.85
4:00	0.03	261.23	617.68	72.26	24.32	0.94	2.18	0.69	10.17	15.37	19.09	11.21	10.51	25.03	-1.01		11.60	11.85
5:00	3.11	261.23	620.28	71.54	24.53	0.95	2.20	0.69	10.38	15.49	23.15	13.81	10.51	25.02	-0.68		11.60	11.85
6:00	-0.01	255.49	618.45	71.12	23.80	0.93	2.15	0.69	9.79	15.54	19.50	11.27	10.30	24.83	-1.00		11.60	11.85
7:00	0.20	213.67	600.90	54.49	16.18	0.86	1.75	0.63	8.48	15.54	37.43	19.28	8.98	24.88	-1.00		11.60	11.85

Comment: Turbine down for boiler repair 6:55 a.m.-7:09 a.m. for 6.1 hour, Nebraska attempted to start up at 7:07, 7:27 AM and 11:09-11:49 AM for total 3 hour





ON/Name	Description	Attribute	Treatment	Ruler Time	Ruler Value	Current Value	Unit	Filter	Time Offset	Form
931AIC111A.NOX	B&W SCR INLET NOX	MV	Mom	02:00 2013-04-06	73.84	86.38	PPM			
931AIC111C.CO	B&W BLR STACK RAW CO	MV	Mom	02:00 2013-04-06	16.88	23.79	PPM			
931AIC111B.O2	B&W BLR RAW O2%	MV	Mean	02:00 2013-04-06	15.35	15.05	%			
931AIC111D.NOX	B&W BLR STACK NOX	MV	Mean	02:00 2013-04-06	8.83	10.48	PPM			
931-AIC-1111.INCAL	RSMT CEMS IN CAL	MV	Mom	02:00 2013-04-06	0	0				
931-aic-1111.trb	RSMT CEMS TROUBLE	MV	Mom	02:00 2013-04-06	0	0				

D1 30 minutes

D2 1 hour

D3 8 hours

D4 1 day

D5 10 days

D6 Positioning...

D7 Trace Control...

D8 Analyze...

D9 Trace Config...

D10 Extended Config...





DRY SHIFT OPERATOR

WET SHIFT OPERATOR

NAME

NAME

Van Zandt

# OFFICIAL DAILY COGENERATION LOG

CHEMICAL PUMPS		NEBRASKA		PERMILITE #10 (CONCENTRATE #10)		STEAM & WATER READINGS		NEBRASKA		NEBRASKA ONLINE TIME		TURBINE		GAS & ELECTRIC READING		BOILER TEST RESULTS		NIGHT SHIFT		
Level	Feed Rate ml/min	NEBRASKA	PERMILITE #10	NEBRASKA	PERMILITE #10	NEBRASKA	WATER	NEBRASKA	NEBRASKA	NEBRASKA	NEBRASKA	NEBRASKA	NEBRASKA	NEBRASKA	NEBRASKA	NEBRASKA	NEBRASKA	NEBRASKA	NEBRASKA	
Shawnee 3.9 ml/min		066141763	48142298	60901475	204478	1593	1652306	7671020	43805	7671020	43805	7671020	43805	7671020	43805	7671020	43805	7671020	43805	7671020
Coals 5.3 ml/min		065902810	4854921	60638537	193815	1638	1440650	7327350	14552	7327350	14552	7327350	14552	7327350	14552	7327350	14552	7327350	14552	7327350
Polymer 8.8 ml/min																				
Caustic (as related)																				
TURBINE		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	100	100	100	100	100	100	100	100	100	100
FSR	%	41.3	49.3	49.3	47.3	47.3	47.2	48.4	48.2	48.2	48.2	48.2	48.2	48.2	48.2	48.2	48.2	48.2	48.2	48.2
Inlet Temp	°F	61	62	63	64	65	66	64	64	63	63	63	63	63	63	63	63	63	63	63
Humidity	%	55.6	54.6	53.6	46.4	40.4	44.8	50.8	45.8	50.9	50.9	53	58	57	57	57	57	57	57	57
Vibration (Max)	MILS	1.2	1.1	1.1	1.2	1.2	1.1	1.2	1.2	1.2	1.2	1.2	1.2	1.2	1.2	1.2	1.2	1.2	1.2	1.2
Steam Injection	#/SEC	188	219	233	223	223	229	222	222	222	222	222	222	222	222	222	222	222	222	222
Turbine L.O. Level	%	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100
T48	°F	1402	1470	1477	1475	1475	1475	1477	1475	1473	1473	1467	1454	1456	1456	1456	1456	1456	1456	1456
GENERATOR		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	100	100	100	100	100	100	100	100	100	100
Gen. Bearing Drain	°F	154	155	156	157	156	156	157	157	156	156	155	155	154	154	154	154	154	154	154
L.O. Supply	°F	128	129	130	131	130	130	130	130	130	130	129	129	129	129	129	129	129	129	129
Gen. Vibration (Max)	IPS	40	41	40	41	41	39	38	38	38	38	36	36	36	36	36	36	36	36	36
Tie Line	MW	12.48	12.50	12.63	12.52	12.50	12.60	12.52	12.46	12.50	12.61	12.50	12.52	12.52	12.52	12.52	12.52	12.52	12.52	12.52
COGEN BOILER		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	100	100	100	100	100	100	100	100	100	100
450 Header Temp	°F	710	710	710	710	709	715	710	710	710	710	710	710	710	710	710	710	710	710	710
HP Drum Level	IN	0.8	1.0	1.0	1.0	0.9	1.0	0.8	1.1	0.9	1.1	1.1	1.1	1.1	1.1	1.1	1.1	1.1	1.1	
LP Drum Level	IN	1.1	1.2	1.0	1.2	0.4	1.0	0.5	1.1	0.5	1.1	1.1	1.1	1.1	1.1	1.1	1.1	1.1	1.1	
HP Drum Pressure	PSI	475	475	475	475	475	479	472	472	472	472	472	472	472	472	472	472	472	472	
LP Drum Pressure	PSI	138	140	140	131	131	139	132	132	132	132	132	132	132	132	132	132	132	132	
CO	PPM	247	253	18.1	16.7	14.7	32.6	16.5	16.5	17.5	17.8	18.5	18	18	18	18	18	18	18	
NOX	PPM	1015	104	106	105	104	9.3	10.1	10.5	10.4	10.5	10.5	10.4	10.5	10.4	10.5	10.5	10.5	10.5	
O2	%	15.43	15.43	15.77	15.42	15.62	15.45	15.34	15.53	15.53	15.35	15.45	15.46	15.46	15.46	15.46	15.46	15.46	15.46	15.46
Hot Well Level	%	142	158	144	144	139	147	147	158	154	136	154	154	154	154	154	154	154	154	
COMPRESSORS		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	100	100	100	100	100	100	100	100	100	100
Filter Separator	PSI	235	233	233	235	237	237	235	235	237	237	237	237	237	237	237	237	237	237	237
Gas Receiver	PSI	420	420	420	420	420	420	420	420	420	420	420	420	420	420	420	420	420	420	420
NEBRASKA BOILER		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	100	100	100	100	100	100	100	100	100	100
Drum Level	IN																			
Drum Pressure	PSI																			
Steam Flow	#/HR																			
Steam Temp	°F																			
NOX	PPM																			
O2	%																			
Blow Down Conductivity	MHO/S																			
NEBRASKA TURBINE WATER WASH		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	100	100	100	100	100	100	100	100	100	100
ON LINE TURBINE WATER WASH	YES																			
NO	CONDUCTIVITY MHOS																			
BOILER FEED WATER PUMP OPERATION	NO																			
NO	NO																			
NEBRASKA		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	100	100	100	100	100	100	100	100	100	100
Running (1 or 2)																				
NEBRASKA		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	100	100	100	100	100	100	100	100	100	100
PH 9.5 - 10.5																				
Conductivity 75 - 200																				
STEAM TEST		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	100	100	100	100	100	100	100	100	100	100
Silica <20 ppb																				
PV NO.2		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	100	100	100	100	100	100	100	100	100	100
Molybdate >200 ppm																				
NOTES:		<p>NEBRASKA ONLINE TIME FROM: 10:00</p> <p>NEBRASKA WARM STORAGE CHECK: YES NO</p> <p>AMMUNIA DELIVERY: YES NO % FULL:</p> <p>NEBRASKA WASH WATER PUMP OPERATION: YES NO</p> <p>COGN BOILER: 450 HEADER TEMP 710, HP DRUM LEVEL 0.8, LP DRUM LEVEL 1.1, HP DRUM PRESSURE 475, LP DRUM PRESSURE 138, CO 247, NOX 1015, O2 15.43, HOT WELL LEVEL 142</p> <p>COMPRESSORS: FILTER SEPARATOR 235, GAS RECEIVER 420</p> <p>NEBRASKA: PH 9.5-10.5, CONDUCTIVITY 75-200</p> <p>STEAM TEST: SILICA &lt;20 PPB</p> <p>PV NO.2: MOLYBDATE &gt;200 PPM</p> <p>NEBRASKA TURBINE WATER WASH: ON LINE TURBINE WATER WASH</p>																		

DATE: 4-5-13

SAFETY IS ALWAYS NO. 1

Huemma Paper Mill

WCH 1030

DAILY ENVIRONMENTAL REPORT

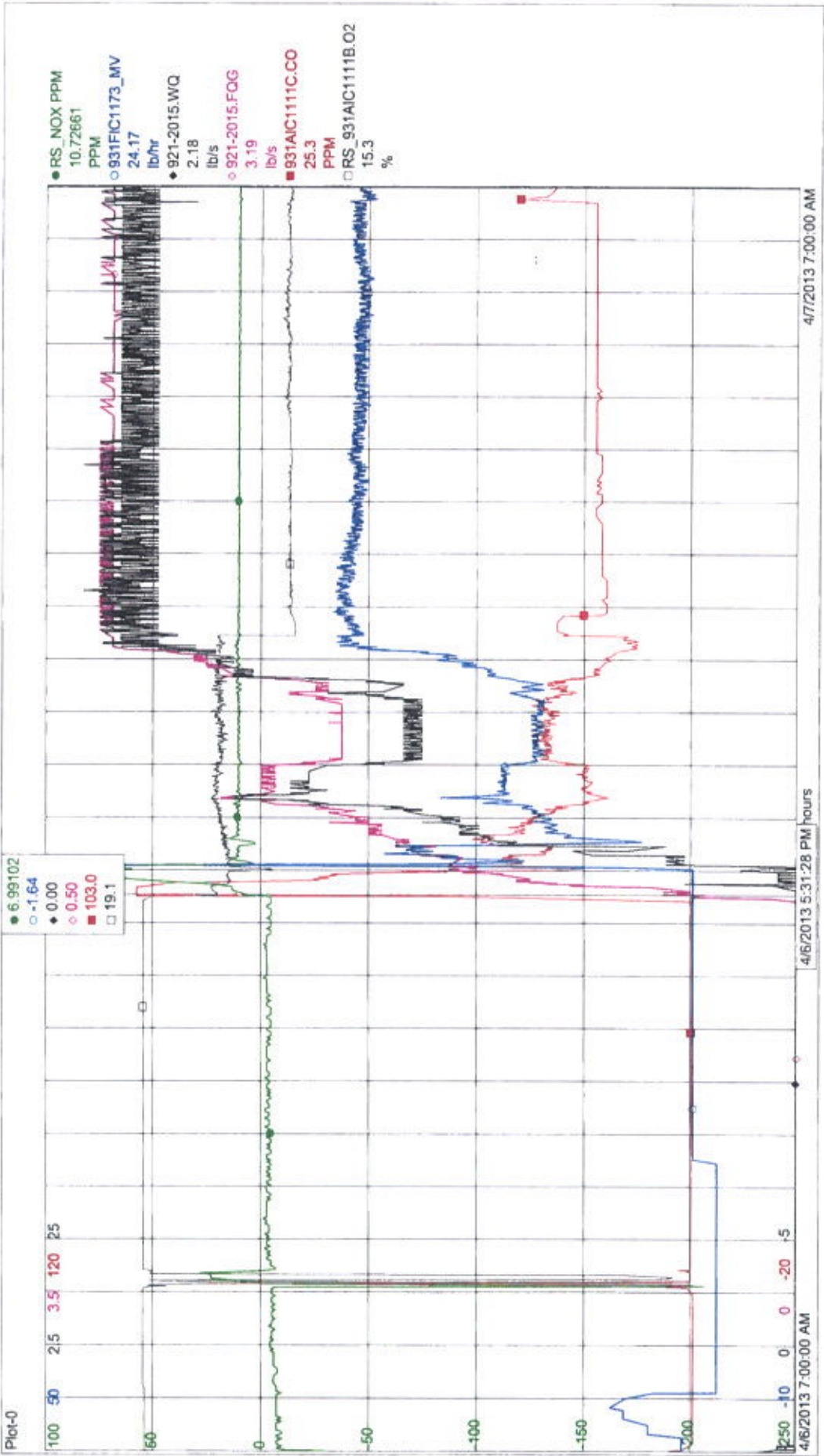
4/8/2013 7:00

4/7/2013 7:00

4/8/2013 7:00

Time	Duct burner gas flow (MGCPH)	Turbine gas flow (MGCPH)	SCR Temperature	SCR inlet NH3 (ppm)	Ammonia Usage (lb/h)	NH3 NOx mole ratio	Injection rate (lb/h)	Steam to NH3 ratio	NOx (lb/h)	Stack O2 (%)	Stack CO (ppm)	Stack SO2 (ppm)	3h Running Average NOx (ppm)	Hebraska CO (%)	Hebraska NOx (%)	Hebraska NOx (lb 3% O2)	Daily Av Copgen NOx (lb/h)	Daily Av Copgen NOx (lb/h)
8:00	-0.01	0.00	502.07	0.66	2.12	-187428.51	0.00	0.00	0.00	21.10	10.48	7.97	3.77	24.06	-1.00		5.44	5.44
9:00	-0.01	0.00	490.81	0.74	-2.07	231781.84	0.00	0.00	0.00	21.10	10.48	7.97	3.77	24.06	-1.00		5.44	5.44
10:00	-0.01	0.00	499.71	0.76	-3.61	282232.84	0.00	0.00	0.00	21.10	10.48	7.97	3.77	24.06	-1.00		5.44	5.44
11:00	-0.01	0.00	499.82	0.41	-3.61	511410.19	0.00	0.00	0.00	21.10	10.48	7.97	3.77	24.06	-1.00		5.44	5.44
12:00	-0.01	0.00	499.02	0.41	-3.61	545047.75	0.00	0.00	0.00	21.10	10.48	7.97	3.77	24.06	-1.00		5.44	5.44
13:00	-0.01	0.00	500.02	0.41	-2.80	397427.06	0.00	0.00	0.00	21.10	10.48	7.97	3.77	24.06	-1.00		5.44	5.44
14:00	-0.01	0.00	500.13	0.41	-1.64	247207.53	0.00	0.00	0.00	21.10	10.48	7.97	3.77	24.06	-1.00		5.44	5.44
15:00	-0.01	0.00	500.23	0.41	-1.64	247207.53	0.00	0.00	0.00	21.10	10.48	7.97	3.77	24.06	-1.00		5.44	5.44
16:00	-0.01	0.00	500.33	0.41	-1.64	247207.53	0.00	0.00	0.00	21.10	10.48	7.97	3.77	24.06	-1.00		5.44	5.44
17:00	-0.01	0.00	500.44	0.41	-1.64	247207.53	0.00	0.00	0.00	21.10	10.48	7.97	3.77	24.06	-1.00		5.44	5.44
18:00	1.28	40.72	500.54	13.96	-1.64	150304.54	0.02	0.02	6.05	21.10	10.48	7.97	3.77	24.06	-1.00		5.44	5.44
19:00	8.20	148.60	509.00	55.46	12.07	1.23	0.77	0.42	8.89	21.10	10.48	7.97	3.77	24.06	-1.00		5.44	5.44
20:00	8.41	190.56	500.48	47.85	13.11	1.03	1.56	0.85	7.98	21.10	10.48	7.97	3.77	24.06	-1.00		5.44	5.44
21:00	8.42	175.38	507.26	42.08	11.01	1.02	1.20	0.80	7.92	21.10	10.48	7.97	3.77	24.06	-1.00		5.44	5.44
22:00	8.44	183.36	500.37	46.58	12.79	1.10	1.54	0.64	7.87	21.10	10.48	7.97	3.77	24.06	-1.00		5.44	5.44
23:00	7.84	257.01	621.18	73.33	24.49	0.96	2.16	0.60	10.47	21.10	10.48	7.97	3.77	24.06	-1.00		5.44	5.44
0:00	0.11	264.09	617.26	77.08	26.10	0.82	2.22	0.60	10.26	21.10	10.48	7.97	3.77	24.06	-1.00		5.44	5.44
1:00	0.06	262.40	615.74	75.88	25.43	0.83	2.22	0.60	10.18	21.10	10.48	7.97	3.77	24.06	-1.00		5.44	5.44
2:00	-0.02	263.44	614.72	75.20	25.18	0.83	2.23	0.60	10.22	21.10	10.48	7.97	3.77	24.06	-1.00		5.44	5.44
3:00	-0.02	261.23	614.33	74.97	23.07	0.83	2.20	0.60	10.13	21.10	10.48	7.97	3.77	24.06	-1.00		5.44	5.44
4:00	-0.02	261.23	613.04	74.97	24.93	0.94	2.20	0.60	10.15	21.10	10.48	7.97	3.77	24.06	-1.00		5.44	5.44
5:00	-0.02	261.05	613.27	74.89	24.81	0.93	2.20	0.60	10.16	21.10	10.48	7.97	3.77	24.06	-1.00		5.44	5.44
6:00	-0.02	261.40	613.04	74.51	24.80	0.93	2.21	0.60	10.16	21.10	10.48	7.97	3.77	24.06	-1.00		5.44	5.44
7:00	1.64	261.17	614.16	74.48	24.94	0.94	2.21	0.60	10.19	21.10	10.48	7.97	3.77	24.06	-1.00		5.44	5.44

Turbine down for boiler leak repair on 4/8/13 from 7 AM - 8:30 PM, a total of 18.5 hrs





DRY SHIFT OPERATOR

DRY SHIFT OPERATOR

88-2158  
MORNING  
MAY 11 2017

NAME:

VanZandt / m

NAME:

M/1

# OFFICIAL DAILY COGENERATION LOG

NEBRASKA BOILER	CONDUCIVITY MHOS		COODUCIVITY MHOS		BOILER FEED WATER PUMP OPERATION	
	YES	NO	YES	NO	NO. 1	NO. 2
Blow Down						
ON LINE TURBINE WATER WASH						
Oz						
NDX						
Steam Temp						
Steam Flow #/HR						
Drum Pressure						
Drum Level						
Gas Receiver						
Filter Separator						
Scanner Blower (ON) Y/N						
Scanner Blower ON Y/N						
1150 SET POINT						
Hot Well Level						
Oz						
NDX						
CO						
LP Drum Pressure						
HP Drum Pressure						
LP Drum Level						
HP Drum Level						
450 Header Temp						
COOLING TWR INLET						
7:00						
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# NEW INDY

CONTAINERBOARD

May 16, 2013

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

Subject: Nebraska Start up – May 15, 2013

Dear Mr. Olson:

This letter is a follow up on the notification call made by Charlie Wilson to the VCAPCD Breakdown Center Hotline on May 15, 2013 at about 8:45 PM.

During the scheduled maintenance shutdown on May 14, 2013, it was discovered that the turbine's hot section was damaged. Offsite repair is required for the damaged section of the turbine. Nebraska boiler was then started up on May 15, 2013 at 8:45 PM to provide steam for paper production. Nebraska CEMS was successfully calibrated prior to start-up.

The Daily Emission Sheet, PI and DCS trends and cogen logs have been provided for your review. If you have any questions or require any additional information, please call me at (805) 271-7284.

Sincerely,

  
Robyn Lebrilla  
Environmental Engineer

**NEW INDY OXNARD, LLC**

5936 PERKINS ROAD • OXNARD, CALIFORNIA 93033 • [WWW.NEWINDYCONTAINERBOARD.COM](http://WWW.NEWINDYCONTAINERBOARD.COM)  
PHONE (805) 986-3881 • FAX (805) 488-5186



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.

<p>Signature and Title of Responsible Official:</p> <p>Signature: </p> <p>Title: <u>Technical Superintendent</u></p>	<p>Date:</p> <p><u>5/16/2013</u></p>
---	--------------------------------------





Plot-0



5/16/2013 7:00:00 AM

24.00 hours

5/15/2013 7:00:00 AM

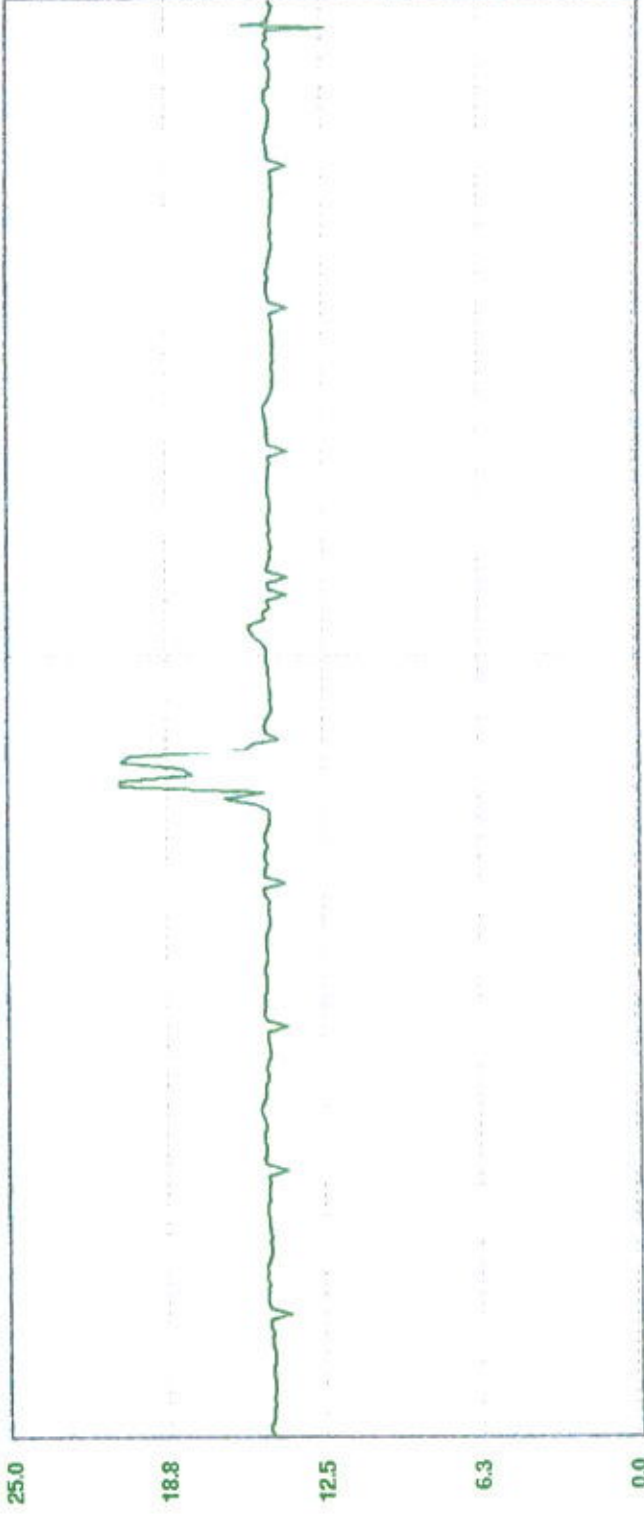


36M

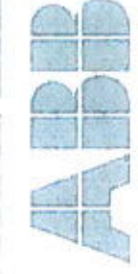
Operator 2013-07-01 14:56

931F1102.BRNRSTP DUCT BURNER STOPPED Value 14:55:37

ObjectTrend: 931AIC111B.O2 B&W/BLR RAW O2% 12,12 6,74



ON Name	Description	Attribute	Treatment	Ruler Time	Ruler Value	Current Value	Unit	Filter	Time Offset	Form
931AIC111B.O2	B&W/BLR RAW O2%	MV	Mean	09:00 2013-06-26	15.66	14.66	%			
				***						
				***						
				***						
				***						
				***						



D1 30 minutes	D2 1 hour	D3 8 hours	D4 1 day	D5 10 days
D6 Positioning...	D7 Trace Control...	D8 Analyze...	D9 Trace Config...	D10 Extended Config...









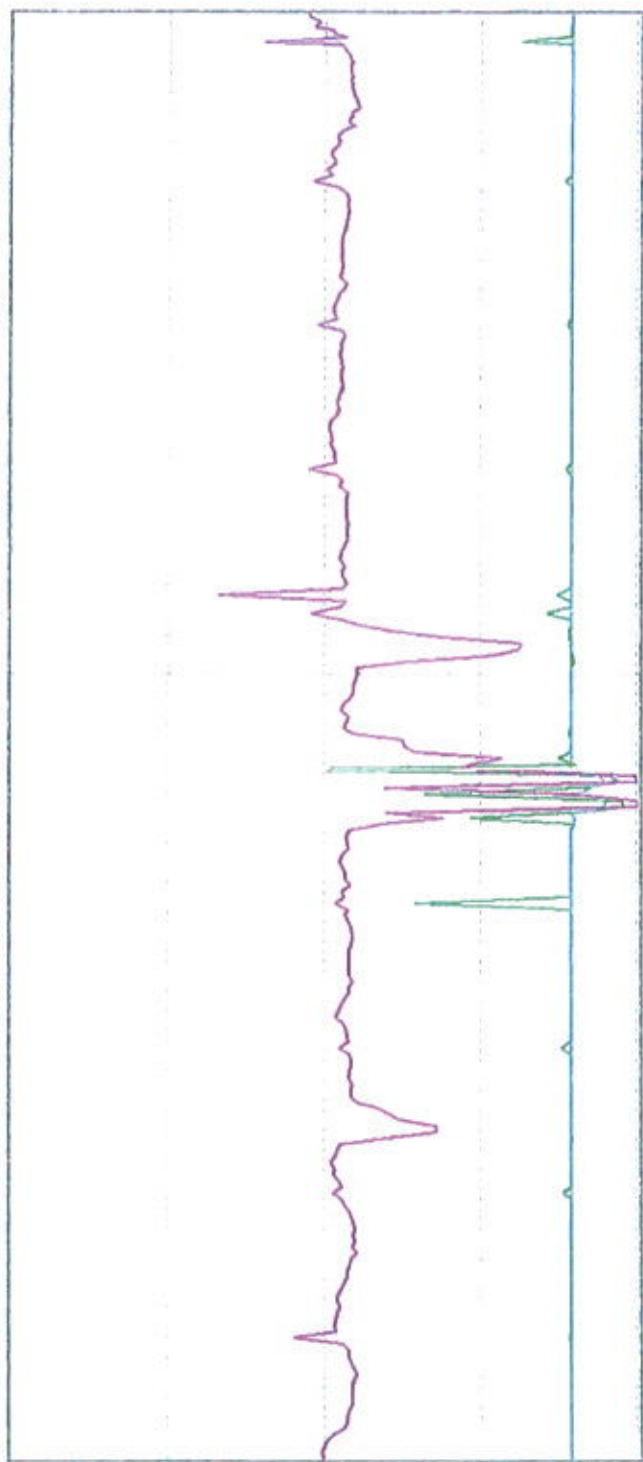






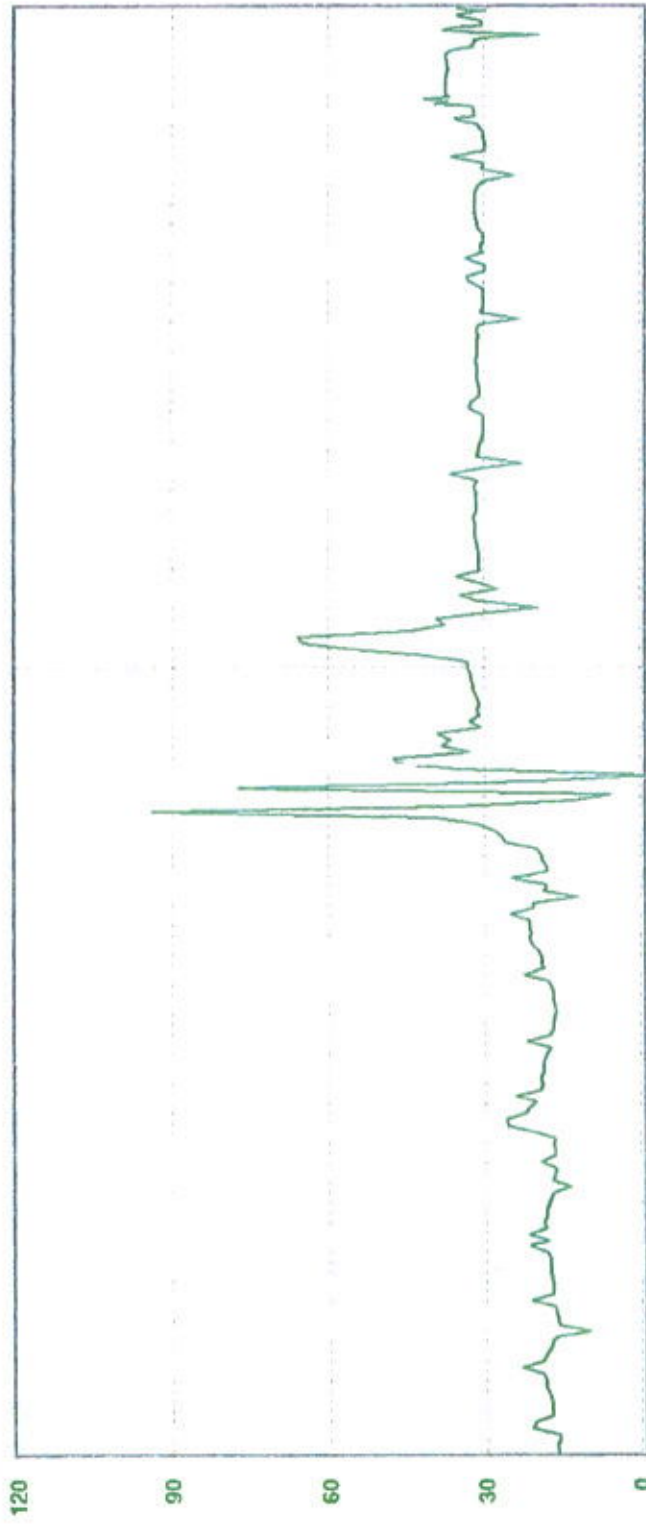


Operator 2013-07-01 14:55 36M  
 931F1102.BRNRSTP DUCT BURNER STOPPED Value 14:55:37  
 Object Trend: 931AIC1110 12.12 62.1



ON/Name	Description	Attribute	Treatment	Ruler Time	Ruler Value	Current Value	Unit	Filter	Time Offset	Form
D1	30 minutes									
D2	1 hour	D3	8 hours	D4	1 day	D5	10 days			
D6	Positioning...	D7	Trace Control...	D8	Analyze...	D9	Trace Config...	D10	Extended Config...	
931AIC1110	BAW BLR STACK CNOX	MV	Mean	09:00 2013-06-26	54.8	10.2	PPM			
931AIC1110	BAW BLR STACK CNOX	SP	Mean	09:00 2013-06-26	10.5	10.5	PPM			
931AIC1110	BAW BLR STACK CNOX	OUT	Mean	09:00 2013-06-26	26.5	51.3	%			
				***						
				***						
				***						





ON Name	Description	Attributz	Treatment	Ruler Time	Ruler Value	Current Value	Unit	Filter	Time Offset	Form
931A11193.CCO	B&W BLR STACK CCO	MV	Mean	09:00 2013-06-26	46.6	30.1	PPM			
D1	30 minutes									
D2	1 hour									
D3	8 hours									
D4	1 day									
D5	10 days									
D6	Positioning...									
D7	Trace Control...									
D8	Analyze...									
D9	Trace Config...									
D10	Extended Config...									





July 4, 2013

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

Subject: Corrupted data

Dear Mr. Olson:

This letter is a follow up on the calls made to the VCAPCD Breakdown Center Hotline on July 3, 2013 by Victor Kumpera.

During emission review on July 3, 2013, it was noticed that emission data sheet indicated extremely high hourly average of the turbine gas usage on July 3, 2013 between 6:00 and 7:00 AM. The detail review of the data showed a sudden, 1.5 minute gas flow spike of hundreds of lb/sec gas flow into the turbine. The gas flow of such magnitude is not realistic. The subsequent investigation indicated that the spike was caused by corrupted data flow from HMI 2 (GE) and the AC 450 on node 12.

All other parameters of the turbine were normal and stable. The data was filtered and it was not used in calculations for the purpose of the permit compliance.

The Daily Emission Sheets, PI trends, the Environmental Incident Report have been provided for your review. If you have any questions or require any additional information, please call me at (805) 271-7279.

Sincerely,

A handwritten signature in blue ink, appearing to read "VK", is written over a light blue horizontal line.

Vitezslav Kumpera  
Technical Manager

**NEW INDY OXNARD, LLC**

5936 PERKINS ROAD • OXNARD, CALIFORNIA 93033 • WWW.NEWINDYCONTAINERBOARD.COM  
PHONE (805) 986-3881 • FAX (805) 488-5186

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Ventura County  
Air Pollution  
Control District

## RESPONSIBLE OFFICIAL'S CERTIFICATION FORM


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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.

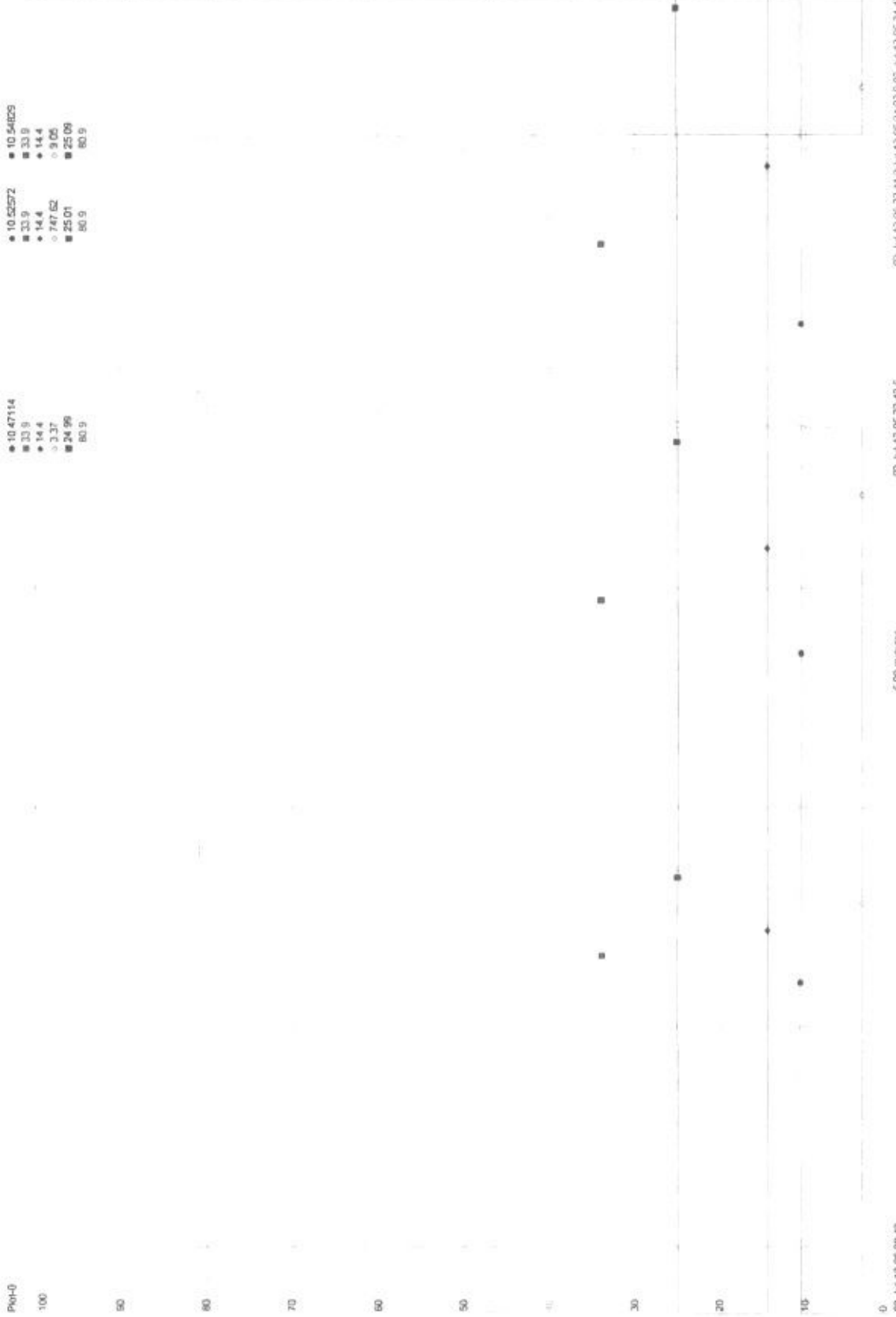
Signature and Title of Responsible Official:	Date: 7/4/2013
Signature: 	
Title: <u>Technical Manager</u>	

● 10.47114  
 ■ 33.9  
 ● 14.4  
 ○ 3.37  
 ■ 24.99  
 ■ 80.9

● 10.52572  
 ■ 33.9  
 ● 14.4  
 ○ 747.62  
 ■ 25.01  
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● 10.54825  
 ■ 33.9  
 ● 14.4  
 ○ 9.05  
 ■ 25.09  
 ■ 80.9

● RS\_NDX PPM  
 10.62952  
 PPM  
 ■ RS\_931AIC1111C CO  
 33.9  
 PPM  
 ● RS\_931AIC1111B O2  
 14.4  
 %  
 ○ 921-2015 FOG  
 3.36  
 lbs  
 ■ 921-2015.DWATT  
 25.32  
 MW  
 ■ RS\_931AIC1111A\_NDX  
 80.9  
 PPM



03-Jul-13 06:28:42  
 6:00 minutes  
 03-Jul-13 06:30:43.6  
 03-Jul-13 06:33:41.2  
 03-Jul-13 06:34:03.9  
 03-Jul-13 06:34:42

● RS\_RATE NOX EMITTED ■ RS\_STACK CO ● RS\_STACK O2 ○ FUEL GAS FLOW RATE ■ GENERATOR Mwh OUTPUT ● RS\_SCR INLET NOX







## Hueneme Mill Environmental Incident Report

Shaded section to be completed by the EMR

Name of Incident Turbine Nat Gas, Steam flows- to PI		Incident Date 7/3/2013	
Exact Location Incident Cogen			
Reported By C. Wilson		Estimated Start and Stop Times of Incident: @-6:33 AM	Possible Cause: Modbus communication.
Incident Type: <input type="checkbox"/> Spill Internal <input type="checkbox"/> Improper Waste Disposal <input type="checkbox"/> Spill External <input type="checkbox"/> Near miss or below spill release guidelines <input checked="" type="checkbox"/> Air Emission <input type="checkbox"/> Other _____		Released To <input type="checkbox"/> Storm Water System <input type="checkbox"/> Secondary Containment <input type="checkbox"/> Process Sewer <input checked="" type="checkbox"/> Air <input type="checkbox"/> Ground (External) <input type="checkbox"/> Ground (Inside Mill Property) <input type="checkbox"/> Near Miss <input type="checkbox"/> Other _____	
Detailed Description of Event On 3 July 2013- HMI stations did not reflect any alarms. Apparent Modbus communication - corrupt data flow from HMI#2 Modbus card to Modbus Card in AC 450 for Node 12 in D MCC. False flow readings for steam and natrual gas recorded into PI.			
<i>(if required use additional paper and attach)</i>			
Estimated Amount Released		pH	CONSISTENCY (%)
<input type="checkbox"/> _____ Gallons <input type="checkbox"/> _____ Pounds <input type="checkbox"/> Other _____			
List Any External Emergency Clean Up Personnel Contacted N/A		List Any External Agencies Contacted (Agency, person and time of call.) APCD @ 2045	
List Hueneme Personnel Contacted (Foreman, Mill Manager, etc.) Lars Gustavson, Rudy Rehbein, Robyn Lebrilla, Victor Kumpera		Any Acute or Chronic Health Risks (refer to MSDS)N/A	
Describe Any Emergency Response Actions N/A			
Suggestions to Prevent Reoccurrence			Estimated Completion Date
1. fund capital project - to upgrade OS system for HMIs to allow direct MKV to PI interface and bypass Modbus communication.			1. 12/31/2013
2.			2.
3.			3.
4.			4.
Root Cause after investigation		Severity Level (level 1 and 2 must be tracked through SHIMS) <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4	
Investigated By: Charlie Wilson		Investigated Date 5/15/13	
<u>Follow Up</u>		<u>By When</u>	<u>Completion Date</u>
Issued by  _____	Reviewed by  _____	Approved by  _____	
Department Manager	Technical Superintendent	Mill Manager	

Print Time: 7/5/2013 2:06:12 PM

Note: This document is valid for only ONE week after print time!

LOCAL PUMPS	STEAM & WATER READINGS		HEBRASKA		PERMEATE H <sub>2</sub> O		CONCENTRATE H <sub>2</sub> O		TURBINE		GAS & ELECTRIC READING		BOILER TEST RESULTS						
	Level	Flow (gpm)	HEBRASKA	HEBRASKA	PERMEATE H <sub>2</sub> O	CONCENTRATE H <sub>2</sub> O	IP	HP	SCU LP	TURBINE	MAXON	BURNER	HEBRASKA	ATTS					
Steamer 33 m3/min			CURRENT	08684580	5836	0123	6495	8352	184	968	2065	2280	800	8385	760	397601	5094	11160	11160
Control 5.8 m3/min			PREVIOUS	08684580	5840	2735	6491	6243	188	882	2135	2277	170	8015	360	327264	11116	16540	16540
Coatic (as needed)			NEW DRAIN TRAILER	YES	NO	TIME	HEBRASKA ONLINE TIME	FROM	TO										
			AMMIDIA DELIVERY	YES	NO	% FULL	7.0 - 9.5												
FSR	%		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00					
Inlet Temp	°C		50.0	49.3	52.1	51.8	52.7	52.3	50.3	49.7	51.1	51	49.8	49.5					
Humidity	%		64	63	64	65	65	65	65	65	65	65	64	64					
Steam Injection	M/S		66.2	69.2	55.2	52.1	55.1	58.2	58.2	57.2	57.2	62.2	67.2	67.2					
Turbine L.O. Level	%		36	36	38	38	38	38	38	38	38	38	38	38					
LAB	F		2.30	2.12	2.49	2.45	2.43	2.30	2.30	2.28	2.29	2.34	2.27	2.27					
			1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00					
			1550	1541	1564	1565	1504	1557	1557	1557	1557	1561	1559	1557					
			BATTERIES	1.35	V	HP RECOUPE	116	FAR	HP RECOUPE	116	FAR	HP RECOUPE	116	FAR					
			AIR INLET DIFF	7.2	HP RECOUPE	116	FAR	HP RECOUPE	116	FAR	HP RECOUPE	116	FAR	HP RECOUPE					
			L.O. DIFFERENTIAL	5	PSI	HP RECOUPE	50	AT	L.O. DIFFERENTIAL	50	AT	L.O. DIFFERENTIAL	50	AT					
Gen. Bearing Drain	T		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00					
L.O. Supply	T		154	154	154	154	154	154	156	156	156	156	154	154					
Gen. Vibration (Max)	IPS		1.30	1.70	1.30	1.30	1.30	1.31	1.31	1.27	1.29	1.29	1.29	1.29					
The Line	MW		40	41	45	46	46	42	42	42	42	42	40	43					
			18.89	12.89	12.61	12.50	12.64	12.40	12.59	12.34	12.60	12.56	12.56	12.56					
			GEN	1150	AMPS	GEN VARS	6.70	MEGA VARS	1130	AMPS	GEN VARS	6.45	MEGA VARS	1130	AMPS	GEN VARS	6.45	MEGA VARS	1130
			COOLING TWR INLET	84	F	COOLING TWR INLET	78	F	COOLING TWR INLET	88	F	COOLING TWR INLET	82	F					
650 Header Temp	T		7:00	7:10	7:10	7:10	7:10	7:10	7:10	7:10	7:10	7:10	7:10	7:10					
HP Drum Level	IN		1.0	1.2	1.0	1.0	1.0	1.0	1.1	0.9	1	1	1	1					
LP Drum Level	IN		0.9	0.9	1.0	0.9	0.8	0.9	0.9	0.9	1.1	1	1	1					
HP Drum Pressure	PSI		485	485	485	485	485	485	485	485	485	485	485	485					
LP Drum Pressure	PSI		144	146	149	146	149	149	149	149	149	149	149	149					
CO	PPM		32.4	32.2	30.3	29.5	29.6	30.4	30.4	30.6	31	31.3	30.8	30.8					
NOX	%		10.4	10.5	10.7	10.5	10.6	10.5	10.5	10.4	10.5	10.5	10.4	10.4					
Hot Well Level	%		14.05	14.95	14.57	14.50	14.49	14.48	14.48	14.45	14.43	14.48	14.41	14.41					
			159	157	157	154	140	145	134	134	159	156	134	152					
			SCANNER BLOWER (ON)	ON	ON	ON	ON	ON	ON	ON	ON	ON	ON	ON					
Filter Separator	PSI		237	237	235	235	235	235	235	235	239	243	241	241					
Eos Receiver	PSI		420	420	420	420	420	420	420	419	420	420	420	420					
Drum Level	IN		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00					
Drum Pressure	PSI		237	237	235	235	235	235	235	235	239	243	241	241					
Steam Flow	#/HR		420	420	420	420	420	420	420	419	420	420	420	420					
Steam Temp	T																		
NOX	PPM																		
OT	%																		
Blow Down Conductivity	MHO'S																		
ON LINE TURBINE WATER WASH																			

OFFICIAL DAILY COGENERATION LOG

NAME: Van Zandt

DRY SHIFT OPERATOR

NIGHT SHIFT OPERATOR

DATE: 7-2-13

SAFETY IS ALWAYS NO. 1

Fluorene Paper Mill

NOTES:

CONDUCTIVITY MHO'S

BOILER FEED WATER PUMP OPERATION

NOX

COOLING TWR INLET

GEN VARS

MEGA VARS

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**NEW WINDY**  
**CONTAINERBOARD**

September 26, 2013

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

Subject: Nebraska Maintenance Start up Notification

Dear Mr. Olson:

This letter is a follow up on the notification call made by Charlie Wilson to the VCAPCD Breakdown Center Hotline on September 25, 2013 at about 7:30 pm.

The Nebraska boiler was fired for maintenance check after undergoing boiler tube repairs. It ran on low fire from 7:07 pm to 7:24 pm, a total of 17 minutes. The Nebraska CEMS was successfully calibrated prior to start-up. The mill plans to operate the standby boiler on October 15-19 to allow for the switch from the lease turbine to the mill's turbine.

The Daily Emission Sheet, Nebraska graph, PI and DCS trends and cogen logs have been provided for your review. If you have any questions or require any additional information, please call me at (805) 271-7284.

Sincerely,

  
Robyn Lebrilla  
Environmental Engineer

**NEW INDY OXNARD, LLC**

5936 PERKINS ROAD • OXNARD, CALIFORNIA 93033 • WWW.NEWINDYCONTAINERBOARD.COM  
PHONE (805) 986-3881 • FAX (805) 488-5186

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Ventura County  
Air Pollution  
Control District

## RESPONSIBLE OFFICIAL'S CERTIFICATION FORM

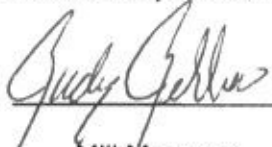
Ventura County APCD Rule 33.9 requires that "any document, including reports, schedule of compliance progress reports and compliance certifications, required by a Part 70 permit shall be certified by a responsible official." Therefore, this form shall be signed by the company's Responsible Official and 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:

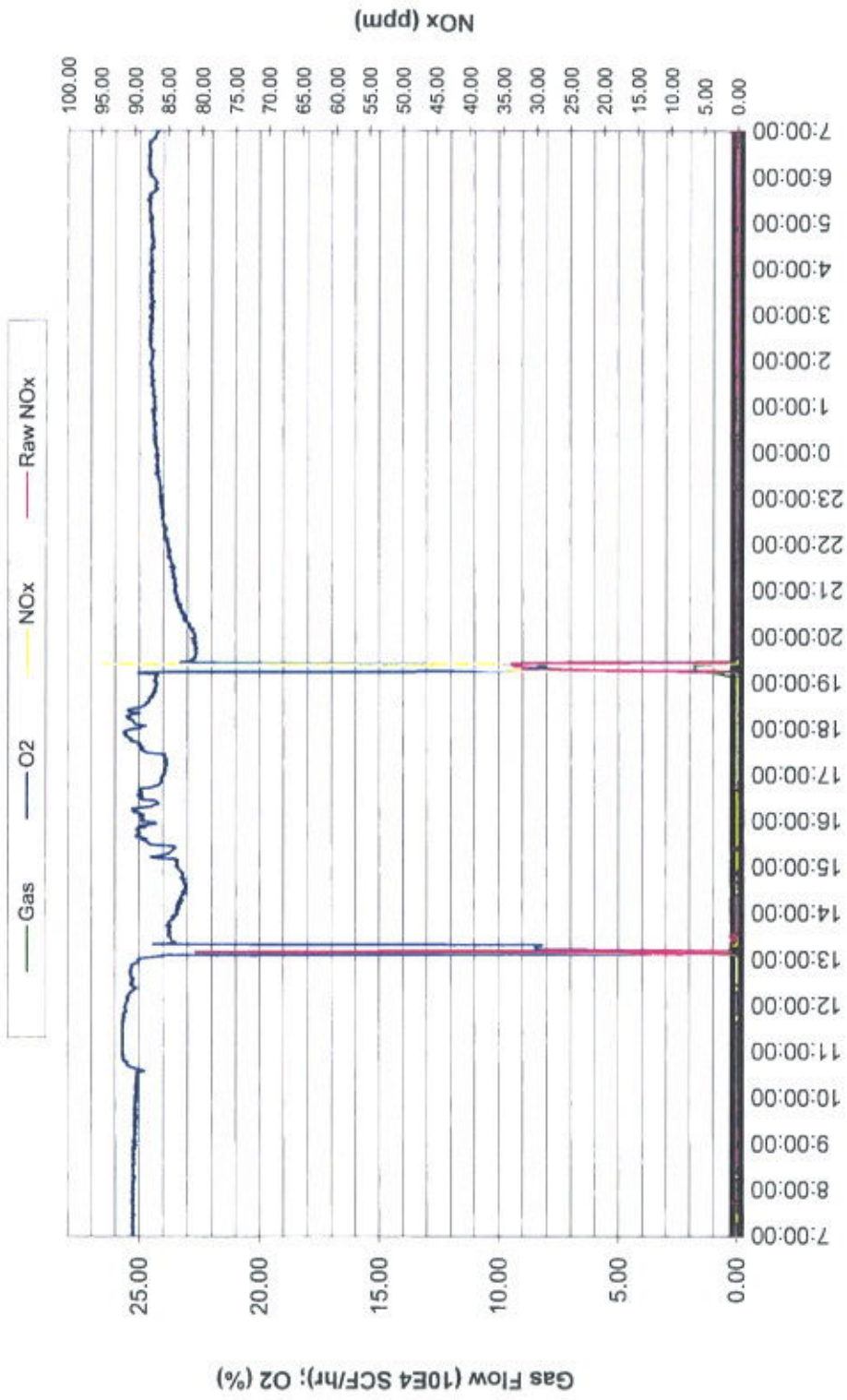
Lyle Olson  
Air Quality Engineer  
Ventura County Air Pollution Control District  
669 County Square Drive  
Ventura, CA 93003

### 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.

<p>Signature and Title of Responsible Official:</p> <p>Signature: <u></u></p> <p>Title: <u>Mill Manager</u></p>	<p>Date: <u>9/26/2013</u></p>
--	-------------------------------

# Nebraska Boiler - Daily Environmental Report



Period: 9/25/2013 - 9/26/2013

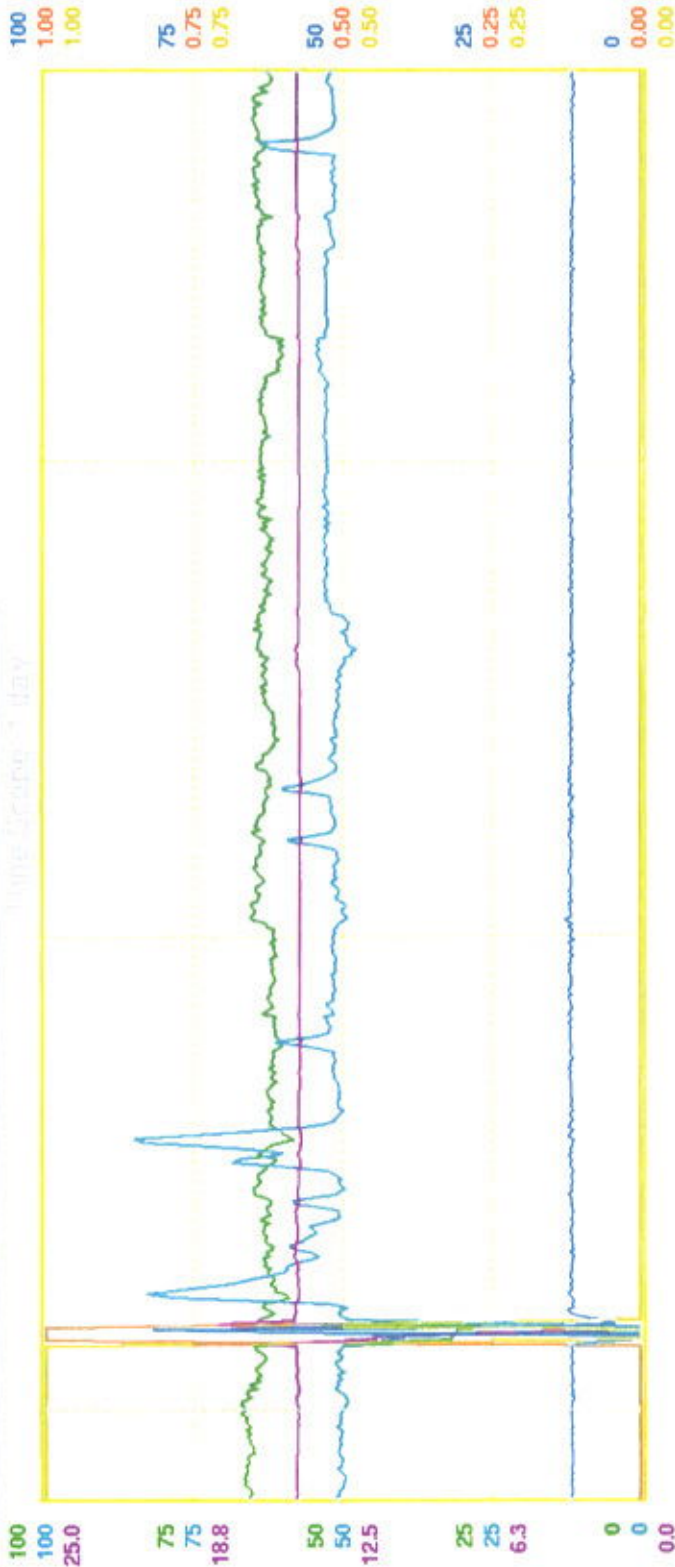


33M

2013-09-26 09:58

COGEN

RSMT\_4-20MA ROSEMOLINT CEMS VALUES



ON/Name	Description	Attribute	Treatment	Ruler Time	Ruler Value	Current Value	Unit	Filter	Time Offset	Form
931AIC1111A.NOX	B&W SCR INLET NOX	MV	Mom	09-02 2013-09-25	66.88	62.82	PPM			
931AIC1111C.CO	B&W BLR STACK RAW CO	MV	Mom	09-02 2013-09-25	50.08	51.84	PPM			
931AIC1111B.O2	B&W BLR RAW O2%	MV	Mean	09-02 2013-09-25	14.42	14.55	%			
931AIC1111D.NOX	B&W BLR STACK NOX	MV	Mean	09-02 2013-09-25	11.48	11.25	PPM			
931-AIC-1111JNCAL	RSMT CEMS IN CAL	MV	Mom	09-02 2013-09-25	0	0				
931-aic-1111.trb	RSMT CEMS TROUBLE	MV	Mom	09-02 2013-09-25	1	0				

D1 30 minutes	D2 1 hour	D3 8 hours	D4 1 day	D5 10 days
D6 Positioning...	D7 Trace Control...	D8 Analyze...	D9 Trace Config...	D10 Extended Config...





CHEMICAL PUMPS		NEBRASKA		STEAM & WATER READINGS		NEBRASKA WARM STORAGE CHECK		GAS & ELECTRIC READING		BOILER TEST RESULTS	
Level	Flow Rate (ml/min)	NEBRASKA	PERCENTAGE	CONCENTRATION	CONCENTRATION	NO	HO	% FULL	NO	HO	NO
Steamate 3.3 ml/min		0.87	0.36	0.87	0.36	19.75	8.6	21.2	2.2	4.4	10
Control 5.3 ml/min		0.87	0.36	0.87	0.36	2.0	3.8	2.0	3.8	2.0	3.8
Phyner 4.8 ml/min		0.87	0.36	0.87	0.36	2.0	3.8	2.0	3.8	2.0	3.8
Caustic (as needed)		0.87	0.36	0.87	0.36	2.0	3.8	2.0	3.8	2.0	3.8

TURBINE		GENERATOR		COGEN BOILER		COMPRESSORS		NEBRASKA BOILER	
PSR	WATER Temp	Gen. Bearing Droon	L.O. Supply	Gen. Vibration (Max)	Tie Line	450 Header Temp	HP Drum Level	LP Drum Level	LP Drum Pressure
6.75	5.8	1.5	1.3	3.3	1.5	7.1	1.2	1.2	4.5
5.1	3.1	1.2	1.2	3.3	1.5	1.2	1.2	1.2	4.5
2.7	2.8	1.2	1.2	3.3	1.5	1.2	1.2	1.2	4.5
1.5	1.5	1.2	1.2	3.3	1.5	1.2	1.2	1.2	4.5

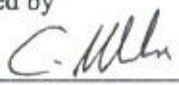


NEBRASKA TRAILER		NEBRASKA WARM STORAGE CHECK		NEBRASKA WARM STORAGE CHECK		NEBRASKA WARM STORAGE CHECK		NEBRASKA WARM STORAGE CHECK	
NO	HO	% FULL	NO	HO	% FULL	NO	HO	% FULL	NO
0.87	0.36	0.87	0.36	0.87	0.36	0.87	0.36	0.87	0.36
0.87	0.36	0.87	0.36	0.87	0.36	0.87	0.36	0.87	0.36
0.87	0.36	0.87	0.36	0.87	0.36	0.87	0.36	0.87	0.36

TURBINE		GENERATOR		COGEN BOILER		COMPRESSORS		NEBRASKA BOILER	
PSR	WATER Temp	Gen. Bearing Droon	L.O. Supply	Gen. Vibration (Max)	Tie Line	450 Header Temp	HP Drum Level	LP Drum Level	LP Drum Pressure
6.75	5.8	1.5	1.3	3.3	1.5	7.1	1.2	1.2	4.5
5.1	3.1	1.2	1.2	3.3	1.5	1.2	1.2	1.2	4.5
2.7	2.8	1.2	1.2	3.3	1.5	1.2	1.2	1.2	4.5
1.5	1.5	1.2	1.2	3.3	1.5	1.2	1.2	1.2	4.5

OFFICIAL DAILY COGENERATION LOG

## Hueneme Mill Environmental Incident Report

Shaded section to be completed by the EMR

Name of Incident Preparation- startup Neb boiler- check out- for Turbine exchange in Oct		Incident Date 9/25/13	
Exact Location Incident Cogen			
Reported By C. Wilson		Estimated Start and Stop Times of Incident: @1930	Possible Cause: start up Nebraska Blr
Incident Type: <input type="checkbox"/> Spill Internal <input type="checkbox"/> Improper Waste Disposal <input type="checkbox"/> Spill External <input type="checkbox"/> Near miss or below spill release guidelines <input checked="" type="checkbox"/> Air Emission <input type="checkbox"/> Other _____		Released To <input type="checkbox"/> Storm Water System <input type="checkbox"/> Secondary Containment <input checked="" type="checkbox"/> Process Sewer <input checked="" type="checkbox"/> X Air <input type="checkbox"/> Ground (External) <input type="checkbox"/> Ground (Inside Mill Property) <input type="checkbox"/> Near Miss <input type="checkbox"/> Other _____	
Detailed Description of Event From 9 Sep- to 25 Sep - tube boiler repairs of the Nebraska boiler. needed to check if COEN panel controls operational- was troubleshooting from @1430-1900 on various issues- till finally cleared to light up the Nebraska boiler.  APCD was contacted @1930 9/25/13 on start-up of Nebraska boiler. message left by C. Wilson.  (if required use additional paper and attach)			
Estimated Amount Released <input type="checkbox"/> _____ Gallons <input type="checkbox"/> _____ Pounds <input type="checkbox"/> Other _____		pH	CONSISTENCY (%)
Estimated Monetary Loss			
List Any External Emergency Clean Up Personnel Contacted N/A		List Any External Agencies Contacted (Agency, person and time of call.) APCD	
List Hueneme Personnel Contacted (Foreman, Mill Manager, etc.) Lars Gustavson, Rudy Rehbein, Robyn Lebrilla , Victor Kumpera		Any Acute or Chronic Health Risks (refer to MSDS)N/A	
Describe Any Emergency Response Actions N/A			
Suggestions to Prevent Reoccurrence			Estimated Completion Date
1.			1.
2.			2.
3.			3.
4.			4.
Root Cause after investigation  Maintenance issue- reported to APCD- start up of Nebraska Boiler.		Severity Level (level 1 and 2 must be tracked through SHIMS) <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4	
Investigated By: Charlie Wilson		Investigated Date 9/25/13	
<u>Follow Up</u>		<u>By When</u>	<u>Completion Date</u>
Issued by  Department Manager 9/20/13	Reviewed by  Technical Superintendent 9/26/13	Approved by  Mill Manager 9/26/2013	

Print Time: 9/26/2013 8:42:16 AM

Note: This document is valid for only ONE week after print time!

**NEW**  **INDY**  
**CONTAINERBOARD**

October 10, 2013

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

Subject: Low Inlet NOx Emissions

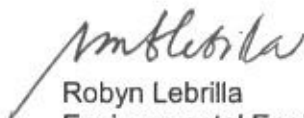
Dear Mr. Olson:

This letter is a follow up on the call I made to the VCAPCD Breakdown Center Hotline on October 9, 2013 at about 10:20 AM.

During emission review on October 9, 2013, it was noticed that there was low inlet NOx emissions. All other emission parameters were at normal level and stable. Troubleshooting then proceeded to check for possible flow restrictions in the sample line. After replacing the inlet NOx sample valve, the emissions reverted to expected level. The inlet NOx emission data were abnormal from October 8, 2013 10:30 AM to October 9, 2013 3:00 PM, a total of 28.5 hours.

The Daily Emission Sheets, PI trends, DCS trends, Cogen Reports and Environmental Incident Report have been provided for your review. If you have any questions or require any additional information, please call me at (805) 271-7284.

Sincerely,



Robyn Lebrilla  
Environmental Engineer

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**NEW INDY OXNARD, LLC**

5936 PERKINS ROAD • OXNARD, CALIFORNIA 93033 • WWW.NEWINDYCONTAINERBOARD.COM  
PHONE (805) 986-3881 • FAX (805) 488-5186



Ventura County  
Air Pollution  
Control District

## RESPONSIBLE OFFICIAL'S CERTIFICATION FORM

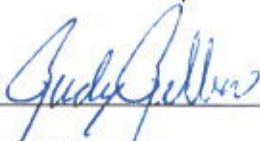
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Semi-annual reports, deviations and emergency reports and any periodic reports required by your Part 70 permit should be submitted to:

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.

<p>Signature and Title of Responsible Official:</p> <p>Signature: <u></u></p> <p>Title: <u>Mill Manager</u></p>	<p>Date:</p> <p><u>10/10/2013</u></p>
--	---------------------------------------

**DAILY ENVIRONMENTAL REPORT**

10/9/2013 7:00

10/9/2013 7:00

Time	Duct burner gas flow MFC-714	Turbine gas flow MFC-714	SCE Temperature %	SCE inlet NOx ppm	Aerosol Loadings lbs	NH3 NOx mole ratio	Injection Units	Steam to NOx Wet ratio	NOx lbs	Stack CO %	Stack NOx ppm	3h Average NOx	Haberstack CO %	Haberstack NOx %	Haberstack Corrected NOx (to 3% O <sub>2</sub> )	Daily Av. Cogen NOx lbs	Daily Av. Cogen NOx lbs
8:00	8.42	267.37	628.24	64.90	22.87	0.95	2.38	0.73	10.64	14.46	17.33	10.51	25.31	-4.06	10.57	10.57	
9:00	5.74	267.54	629.26	65.20	23.01	0.94	2.37	0.73	10.58	14.47	16.77	10.48	25.35	-3.88			
10:00	-0.01	270.70	624.14	68.01	23.65	0.94	2.41	0.73	10.50	14.52	20.04	10.49	25.28	-3.72			
11:00	-0.01	270.62	624.33	47.53	23.17	1.32	2.45	0.73	9.79	14.55	19.32	10.38	25.34	-4.03			
12:00	-0.01	273.69	624.65	47.53	24.23	1.37	2.50	0.75	10.63	14.52	19.15	10.40	25.17	-4.00			
13:00	-0.01	275.82	625.83	47.86	24.41	1.36	2.51	0.75	10.69	14.48	18.09	10.40	25.25	-3.96			
14:00	0.78	272.75	626.01	47.34	24.23	1.35	2.47	0.74	10.58	14.47	20.00	10.43	25.25	-4.25			
15:00	1.75	272.06	630.28	46.21	24.25	1.42	2.49	0.74	10.55	14.45	22.85	10.49	25.25	-4.37			
16:00	0.07	271.81	627.73	43.72	24.15	1.48	2.45	0.74	10.50	14.49	19.10	10.47	25.57	-4.37			
17:00	0.07	272.49	627.81	42.53	24.08	1.51	2.46	0.74	10.59	14.46	19.43	10.51	25.49	-4.21			
18:00	2.72	273.69	630.26	39.50	23.54	1.56	2.49	0.75	10.72	14.37	25.05	10.49	25.70	-3.83			
19:00	0.07	272.32	627.74	34.49	23.70	1.83	2.47	0.74	10.55	14.41	19.64	10.48	25.70	-3.89			
20:00	0.07	271.47	625.85	32.58	23.03	1.98	2.44	0.74	10.56	14.50	20.19	10.50	25.70	-3.89			
21:00	2.75	271.30	627.94	29.96	23.32	2.07	2.42	0.73	10.69	14.46	24.95	10.47	25.70	-3.89			
22:00	0.99	271.04	625.28	31.23	23.72	2.05	2.44	0.74	10.53	14.51	19.76	10.49	25.89	-3.89			
23:00	0.05	271.81	625.42	31.54	23.70	2.02	2.44	0.74	10.54	14.45	19.94	10.48	25.68	-3.89			
0:00	0.09	271.64	625.38	30.30	23.65	2.08	2.45	0.74	10.54	14.46	20.62	10.49	25.67	-3.89			
1:00	0.34	271.47	625.44	28.23	23.57	2.23	2.45	0.74	10.54	14.46	21.28	10.50	25.88	-3.77			
2:00	4.34	269.93	628.28	26.80	23.05	2.34	2.40	0.73	10.67	14.42	27.02	10.53	25.89	-3.64			
3:00	3.41	269.90	627.79	27.71	22.90	2.24	2.38	0.73	10.57	14.44	26.23	10.50	25.07	-3.68			
4:00	6.98	268.74	630.60	26.97	22.72	2.25	2.38	0.73	10.71	14.39	26.12	10.52	25.03	-3.76			
5:00	6.43	269.76	631.88	26.80	22.86	2.11	2.39	0.73	10.70	14.42	27.40	10.48	25.62	-3.81			
6:00	6.45	269.25	631.79	29.59	22.88	2.03	2.38	0.73	10.83	14.45	27.05	10.50	25.81	-3.53			
7:00	5.28	268.05	631.04	28.54	23.05	2.15	2.39	0.73	10.83	14.36	25.93	10.50	25.58	-3.88			

Low Inlet NOx emission data after auto calibration on 10/9/13. R. Lebrilla called APCD breakdown on 10/9/13 at 10:30 AM. Under investigation.

DAILY ENVIRONMENTAL REPORT

10/10/2013 7:00

10/10/2013 7:00

Unit Time

Time	Duct burner MG/CFH	Jet burner gas flow MG/CFH	SCM Temperature °F	SCM rate MCH ppm	Ammonia Usage lb/h	NOx/NOA mole ratio	Heater rate lb/h	Steam to heat ratio lb/h	NOx lb/h	Stack O2 %	Stack CO ppm	Stack NOx ppm	3h Running Average NOx	Hebraska CO %	Hebraska NOx %	Hebraska Corrected NOx (to 3% O <sub>2</sub> )	Daily Air Oxygen MCH lb/h	Daily Air Oxygen MCH lb/h
8:00	2.04	270.27	626.22	27.40	23.40	2.29	2.40	0.73	10.56	14.52	23.07	14.62	10.51	25.59	-3.87		10.40	10.40
9:00	8.61	271.47	630.75	27.95	23.43	2.46	2.42	0.73	10.77	14.41	17.27	10.47	10.49	25.58	-3.86			
10:00	0.15	269.17	625.90	28.44	24.70	30.76	2.38	0.73	11.42	14.06	16.85	10.49	10.91	25.51	-3.77			
11:00	-0.01	269.84	625.24	28.98	23.05	2.16	2.40	0.73	10.78	14.75	20.57	12.59	10.72	25.52	-3.86			
12:00	-0.01	271.13	625.24	29.28	23.88	2.18	2.41	0.73	10.55	14.57	20.64	12.70	10.54	25.50	-3.86			
13:00	-0.01	271.47	625.34	29.30	24.28	237.02	2.44	0.74	10.67	14.53	20.46	12.40	10.63	25.59	-3.73			
14:00	-0.01	269.59	624.36	7.80	24.32	69.16	2.39	0.73	9.98	14.64	21.70	13.20	10.81	25.50	-3.81			
15:00	-0.01	270.88	624.18	11.06	24.55	131.94	2.41	0.73	10.28	14.61	21.57	13.10	10.33	25.57	-3.81			
16:00	4.23	270.10	628.95	66.67	24.04	1.05	2.41	0.73	10.80	14.58	16.84	10.57	10.30	25.64	-4.55			
17:00	6.87	250.64	622.57	61.66	20.05	0.93	2.18	0.71	9.95	14.60	30.72	18.84	10.48	25.65	-4.66			
18:00	0.18	266.18	623.86	70.78	23.52	0.90	2.33	0.72	10.30	14.54	20.60	12.32	10.46	25.64	-4.09			
19:00	1.40	265.84	623.35	69.48	23.23	0.91	2.33	0.72	10.32	14.49	23.63	14.40	10.46	25.56	-4.03			
20:00	0.77	265.24	623.24	69.62	23.05	0.92	2.31	0.72	10.34	14.51	22.59	13.56	10.47	25.51	-4.03			
21:00	0.00	265.57	621.40	70.44	23.19	0.90	2.32	0.72	10.29	14.52	21.11	12.40	10.49	25.49	-4.03			
22:00	0.99	265.05	621.79	69.45	23.18	0.82	2.32	0.72	10.21	14.51	23.06	13.63	10.48	25.47	-4.03			
23:00	2.88	266.01	624.50	68.84	22.98	0.91	2.31	0.72	10.46	14.51	24.43	14.84	10.43	25.47	-4.03			
0:00	-0.01	266.35	621.22	69.29	23.06	0.91	2.34	0.72	10.31	14.59	20.77	12.45	10.48	25.44	-4.03			
1:00	-0.01	266.35	620.64	68.07	22.78	0.92	2.33	0.72	10.33	14.60	21.53	12.86	10.50	25.40	-4.03			
2:00	-0.01	266.53	619.87	67.21	22.67	0.93	2.34	0.72	10.34	14.61	21.56	12.95	10.50	25.49	-4.03			
3:00	2.41	265.15	622.27	66.00	22.36	0.94	2.33	0.72	10.36	14.59	25.32	15.06	10.47	25.53	-4.03			
4:00	-0.03	266.35	620.53	67.68	22.83	0.92	2.34	0.72	10.33	14.63	21.80	13.16	10.49	25.56	-4.14			
5:00	-0.03	266.35	619.85	67.65	22.60	0.93	2.33	0.72	10.36	14.63	21.73	13.99	10.52	25.57	-4.16			
6:00	0.00	266.35	619.87	67.85	22.63	0.92	2.34	0.72	10.37	14.63	21.85	13.08	10.52	25.59	-4.43			
7:00	2.53	265.32	620.87	66.01	22.30	0.92	2.31	0.71	10.36	14.64	25.63	15.51	10.48	25.59	-4.37			

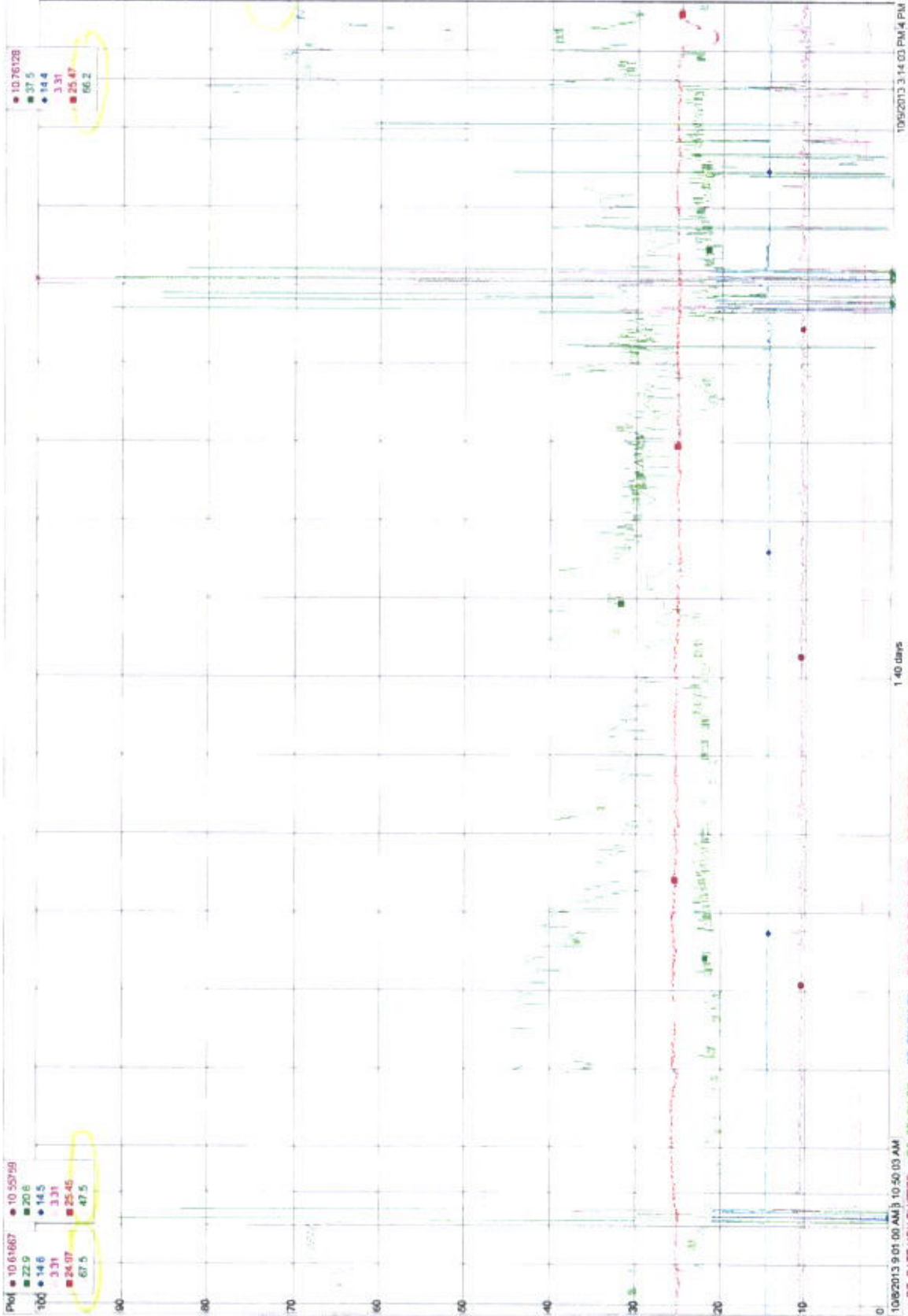
Comment: Low inlet NOx emission data after auto calibration on 10/01/13. Sample line valve was replaced. Inlet NOx has restricted flow from 10/01/13 10:30 AM to 10/01/13 3:00 PM, a total of 28.5 hrs.

PRINT TIME: 10/10/2013 8:03 AM  
NOTE: This document is valid for only ONE week after print time

Prof 10.61687 10.53799  
 22.9 20.8  
 14.6 14.5  
 3.31 3.31  
 24.97 25.45  
 67.5 47.5

10.76128  
 37.5  
 14.4  
 3.31  
 25.47  
 66.2

RS\_INDX PPM  
 10.56820  
 PPM  
 RS\_931AC1111C CO  
 22.0  
 PPM  
 RS\_931AC1111B O2  
 14.6  
 %  
 901-2013 FOG  
 3.25  
 %  
 901-2013 DWATT  
 24.72  
 MW  
 RS\_931AC1111A NOX  
 70.4  
 PPM



10/8/2013 9:01:00 AM to 10:50:03 AM 1.40 days  
 RS\_RATE NOX EMITTED RS\_STACK CO RS\_STACK O2 FUEL GAS FLOW RATE GENERATOR MW OUTPUT RS\_SCR INLET NOX

10/9/2013 3:14:00 PM

RSMT\_4-20MA ROSEMOUNT CEMS VALUES



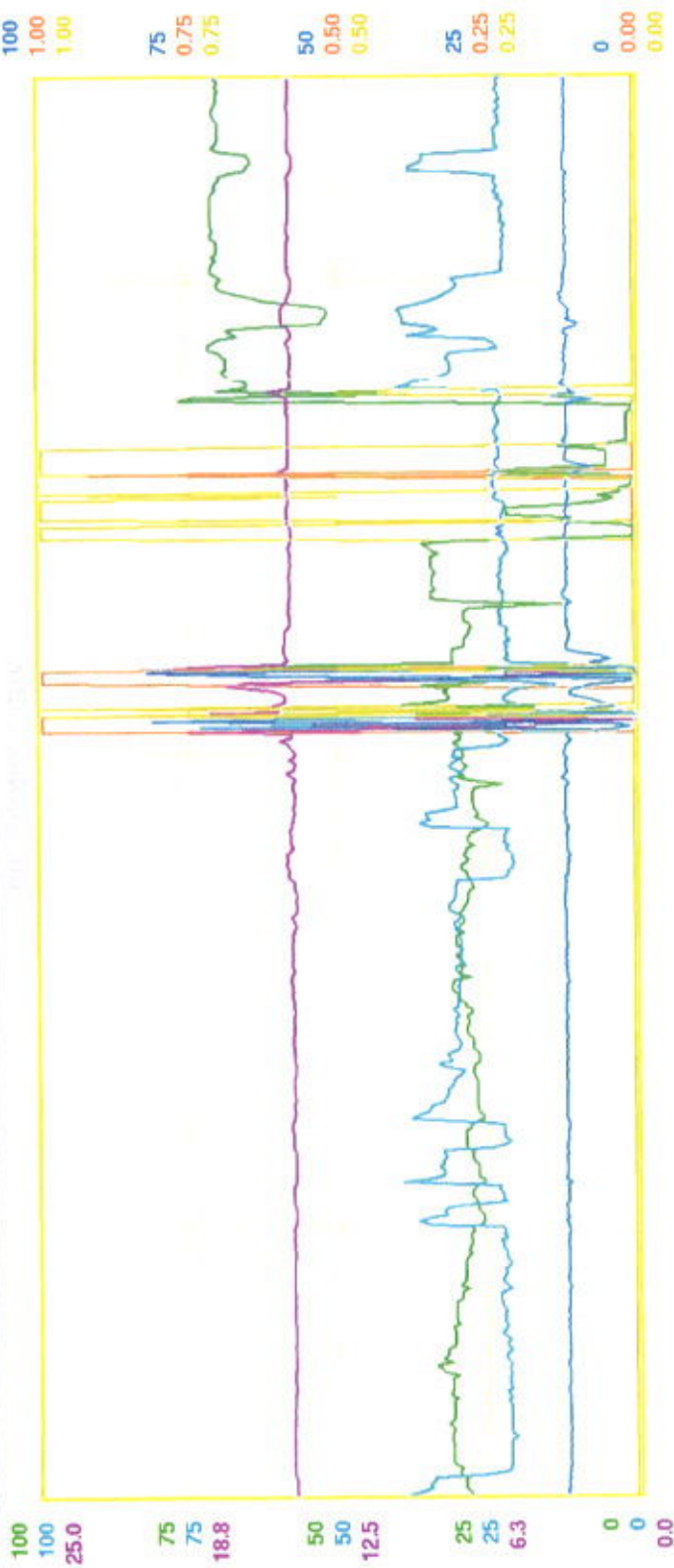
ON/Name	Description	Attribute	Treatment	Ruler Time	Ruler Value	Current Value	Unit	Filter	Time Offset	Form
931AIC1111A.NOX	B&W SCR INLET NOX	MV	Mom	11:30 2013-10-08	47.53	70.81	PPM			
931AIC1111C.CO	B&W BLR STACK RAW CO	MV	Mom	11:30 2013-10-08	20.72	21.44	PPM			
931AIC1111B.O2	B&W BLR RAW O2%	MV	Mean	11:30 2013-10-08	14.51	14.63	%			
931AIC1111D.NOX	B&W BLR STACK NOX	MV	Mean	11:30 2013-10-08	11.52	11.18	PPM			
931-AIC-1111.INCAL	RSMT CEMS IN CAL	MV	Mom	11:30 2013-10-08	0	0				
931-aic-1111.trb	RSMT CEMS TROUBLE	MV	Mom	11:30 2013-10-08	0	0				

D1 30 minutes	D2 1 hour	D3 8 hours	D4 1 day	D5 10 days
D6 Positioning...	D7 Trace Control...	D8 Analyze...	D8 Trace Config...	D10 Extended Config...





RSMT\_4-20MA ROSEMOUNT CEMS VALUES



ON Name	Description	Attributz	Treatment	Ruler Time	Ruler Value	Current Value	Unit	Filter	Time Offset	Form
931AIC1111A.NOX	B&W SCR INLET NOX	MV	Mom	15:22 2013-10-08	68.25	70.81	PPM			
931AIC1111C.CO	B&W BLR STACK RAW CO	MV	Mom	15:22 2013-10-08	32.38	21.44	PPM			
931AIC1111B.O2	B&W BLR RAW O2%	MV	Mean	15:22 2013-10-08	14.46	14.63	%			
931AIC1111D.NOX	B&W BLR STACK NOX	MV	Mean	15:22 2013-10-08	11.20	11.14	PPM			
931-AIC-1111.INCAL	RSMT CEMS IN CAL	MV	Mom	15:22 2013-10-08	0	0				
931-aic-1111.trb	RSMT CEMS TROUBLE	MV	Mom	15:22 2013-10-08	0	0				

D1 30 minutes	D2 1 hour	D3 8 hours	D4 1 day	D5 10 days
D6 Positioning...	D7 Trace Control...	D8 Analyze...	D9 Trace Config...	D10 Extended Config...





CAL PUMPS		STEAM & WATER READINGS		GAS & ELECTRIC READING		BOILER TEST RESULTS					
Level	Flow Rate (m <sup>3</sup> /min)	NEBRASKA PERMEATE H <sub>2</sub> O	CONCENTRATE H <sub>2</sub> O	LP	HP	TURBINE	MAWCH	BURNER	NEBRASKA	WATTS	
Steamline 5.9 m <sup>3</sup> /min		08832487	70050814	154210	1804	2480770	5172430	30873		77268	
Carton 5.9 m <sup>3</sup> /min		08828347	70050815	145878	1835	2589180	4800700	542784	54003	76470	
Paymer 8.8 m <sup>3</sup> /min											
Coalic (as needed)											
TURBINE		NEBRASKA ONLINE TIME		FROM		TO		DAY SHIFT		NIGHT SHIFT	
FSR	%	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00
inlet Temp	°F	50.4	57.2	57.6	57.6	57.6	57.6	48.3	49.2	48.1	48.7
Humidity	%	42.4	40	32	32	33	35	55	53	52	51
Vibration (Max)	MILS	4.0	4.0	3.2	3.2	3.3	3.5	5.0	5.0	5.2	5.3
Steam Injection	#/SEC	2.44	2.0	2.30	2.30	2.34	2.34	3.4	3.4	3.4	3.4
Turbine L.O. Level	%	100	100	100	100	100	100	2.28	2.42	2.41	2.36
T48	°F	1500	1501	1512	1512	1512	1512	1487	1488	1482	1477
GENERATOR		NEBRASKA WARM STORAGE CHECK		HP RECOURSE		VPSI		HP RECOURSE		FAL	
Gen. Bearing Drain	°F	120	120	120	120	120	120	135	135	130	130
L.O. Supply	°F	130	130	130	130	130	130	126	126	128	130
Gen. Vibration (Max)	#PS	40	40	40	40	40	40	40	40	40	40
Tra Line	MW	12.45	12.56	12.53	12.56	12.56	12.56	12.52	12.44	12.59	12.50
COGEN BOILER		GEN. GEN. VARS		GEN. GEN. VARS		GEN. GEN. VARS		GEN. GEN. VARS		GEN. GEN. VARS	
450 Header Temp	°F	710	710	710	710	710	710	710	710	710	710
HP Drum Level	IN	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
LP Drum Level	IN	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
HP Drum Pressure	PSI	477	477	477	477	477	477	484	484	484	484
LP Drum Pressure	PSI	147	147	147	147	147	147	147	147	147	147
CO	PPM	17.5	17.5	17.5	17.5	17.5	17.5	17.5	17.5	17.5	17.5
NOX	PPM	14.5	14.5	14.5	14.5	14.5	14.5	14.5	14.5	14.5	14.5
O2	%	14.37	14.50	14.59	14.59	14.59	14.59	14.52	14.63	14.63	14.63
Hot Well Level	%	149	142	147	147	147	147	140	140	141	158
COMPRESSORS		SCANNER BLOWER (ON ) Y/N		DUCT BURNER		SP		DUCT BURNER SP		442	
Filter Separator	PSI	232	232	232	232	232	232	232	232	236	234
Gas Receiver	PSI	420	420	420	420	420	420	420	420	420	419
NEBRASKA BOILER		NEBRASKA ONLINE TIME		FROM		TO		DAY SHIFT		NIGHT SHIFT	
Drum Level	IN	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00
Drum Pressure	PSI	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100
Steam Flow	#/HR	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100
Steam Temp	°F	420	420	420	420	420	420	420	420	420	420
NOX	PPM	14.5	14.5	14.5	14.5	14.5	14.5	14.5	14.5	14.5	14.5
Flow Down Conductivity	MDCS	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100
ON LINE TURBINE WATER WASH	YES/NO										
NEBRASKA BOILER		NEBRASKA ONLINE TIME		FROM		TO		DAY SHIFT		NIGHT SHIFT	
PH 8.75 - 9.5		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00
Conductivity <5mmhos		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00
Silica < 20 ppb		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00
R.O.		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00
Feed TDS < 1000 ppm		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00
Permeate TDS < 10 ppm		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00
PH (Feed 7.5)		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00
CONDENSATE		NEBRASKA ONLINE TIME		FROM		TO		DAY SHIFT		NIGHT SHIFT	
HP-PH 8.5 - 9.5		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00
Conductivity < 20mmhos		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00
LP-PH 8.5 - 9.5		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00
Conductivity < 20mmhos		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00
HP		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00
PH 9.5 - 10.5		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00
Conductivity 75-150		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00
Phosphate 5-15 ppm		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00
Silica < 5 ppm		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00
Iron ppm		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00
LP		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00
PH 9.5 - 10.5		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00
Conductivity 75 - 150		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00
Phosphate 5-15 ppm		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00
Silica < 5 ppm		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00
Iron ppm		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00
MIXED BED		NEBRASKA ONLINE TIME		FROM		TO		DAY SHIFT		NIGHT SHIFT	
PH 6.0 - 7.5		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00
Conductivity < 1mmhos		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00
Silica < 10 ppb		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00
HP Steam Test		NEBRASKA ONLINE TIME		FROM		TO		DAY SHIFT		NIGHT SHIFT	
Silica < 20 ppb		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00
Hardness < 1.0 ppm		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00
SOFTNER		NEBRASKA ONLINE TIME		FROM		TO		DAY SHIFT		NIGHT SHIFT	
Running (1 or 2)		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00
NEBRASKA		NEBRASKA ONLINE TIME		FROM		TO		DAY SHIFT		NIGHT SHIFT	
Conductivity 75 - 200		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00
Silica		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00
STEAM TEST		NEBRASKA ONLINE TIME		FROM		TO		DAY SHIFT		NIGHT SHIFT	
Silica < 20 ppb		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00
PV NO.2		NEBRASKA ONLINE TIME		FROM		TO		DAY SHIFT		NIGHT SHIFT	
Moysabate < 2000 ppm		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00

NAME: *Vandant* NIGHT SHIFT OPERATOR


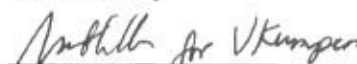
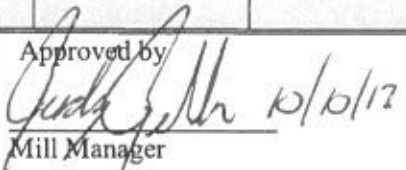
NAME: *M.A* DRY SHIFT OPERATOR

OFFICIAL DAILY COGENERATION LOG

NOTES: 781-2247-APAM SKID ALARM - 6:58A  
 \* 1st of the 2nd shift 8:20 - 10:30  
 \*\* 3rd shift 8:20 - 10:30  
 CHILLER OFF - 9:AM - PV

## Hueneme Mill Environmental Incident Report

Shaded section to be completed by the EMR

Name of Incident <b>Low inlet NOx emissions</b>		Incident Date <b>10/9/13</b>	
Exact Location Incident <b>Cogen</b>			
Reported By <b>J. Maharaj</b>		Estimated Start and Stop Times of Incident: <b>10/8-10:30AM to 10/9-3:00 PM</b>	Possible Cause: <b>restricted flow</b>
Incident Type: <input type="checkbox"/> Spill Internal <input type="checkbox"/> Spill External <input checked="" type="checkbox"/> Air Emission <input type="checkbox"/> Other _____		Released To <input type="checkbox"/> Storm Water System <input type="checkbox"/> Process Sewer <input type="checkbox"/> Ground (External) <input type="checkbox"/> Near Miss <input type="checkbox"/> Other _____	
<input type="checkbox"/> Improper Waste <input type="checkbox"/> Near miss or below spill release guidelines		<input type="checkbox"/> Secondary Containment <input checked="" type="checkbox"/> Air <input type="checkbox"/> Ground (Inside Mill Property)	
Detailed Description of Event  Daily check of emissions on 10/9/13 @ 8:30AM showed low inlet NOx. E&I Tech troubleshooting followed. The sample line was checked for moisture, filter and sample pump were replaced. The flow was still restricted after these efforts. The 3-way sample valve was then replaced, which corrected back the inlet emissions to expected level. Successful manual cal was completed at about 3:07PM on 10/9/13.  APCD was contacted @10:20 10/9/13 by Robyn Lebrilla. (if required use additional paper and attach)			
Estimated Amount Released <input type="checkbox"/> _____ Gallons <input type="checkbox"/> _____ Pounds <input type="checkbox"/> Other _____		pH	CONSISTENCY (%)
Estimated Monetary Loss			
List Any External Emergency Clean Up Personnel Contacted N/A		List Any External Agencies Contacted (Agency, person and time of call.) APCD	
List Hueneme Personnel Contacted (Foreman, Mill Manager, etc.) Robyn Lebrilla, Charlie Wilson		Any Acute or Chronic Health Risks (refer to MSDS)N/A	
Describe Any Emergency Response Actions N/A			
Suggestions to Prevent Reoccurrence			Estimated Completion Date
1.			1.
2.			2.
3.			3.
4.			4.
Root Cause after investigation  The 3-way sample valve was restricted.		Severity Level (level 1 and 2 must be tracked through SHIMS) <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4	
Investigated By: <b>Jay Maharaj</b>		Investigated Date <b>10/9/13</b>	
<u>Follow Up</u>		<u>By When</u>	<u>Completion Date</u>
Issued by  Department Manager	Reviewed by  Technical Superintendent 10/10/13	Approved by  Mill Manager	

Print Time: 10/10/2013 9:51:36 AM

Note: This document is valid for only ONE week after print time!

**NEW**  **INDY**  
**CONTAINERBOARD**

October 16, 2013

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

Subject: Nebraska Start up – October 15, 2013

Dear Mr. Olson:

This letter is a follow up on the notification call made by Charlie Wilson to the VCAPCD Breakdown Center Hotline on October 15, 2013 at about 4:30 AM.

On May 15, 2013, the mill's turbine was sent offsite to repair the damage section of the turbine. The cogen ran on a lease turbine for the past four months. To allow the switch from the lease turbine to the mill's turbine and for continued supply of steam for paper production, the Nebraska boiler was fired on October 15, 2013 at 4:17AM. The Nebraska CEMS was successfully calibrated prior to start-up. The standby boiler is expected to run for several days until the turbine installation is complete.

The Daily Emission Sheet, PI and DCS trends and cogen logs have been provided for your review. If you have any questions or require any additional information, please call me at (805) 271-7284.

Sincerely,



Robyn Lebrilla  
Environmental Engineer

---

**NEW INDY OXNARD, LLC**

5936 PERKINS ROAD • OXNARD, CALIFORNIA 93033 • WWW.NEWINDYCONTAINERBOARD.COM  
PHONE (805) 986-3881 • FAX (805) 488-5186



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: 	10/16/17
Title: <u>Technical Manager</u>	

**DAILY ENVIRONMENTAL REPORT**

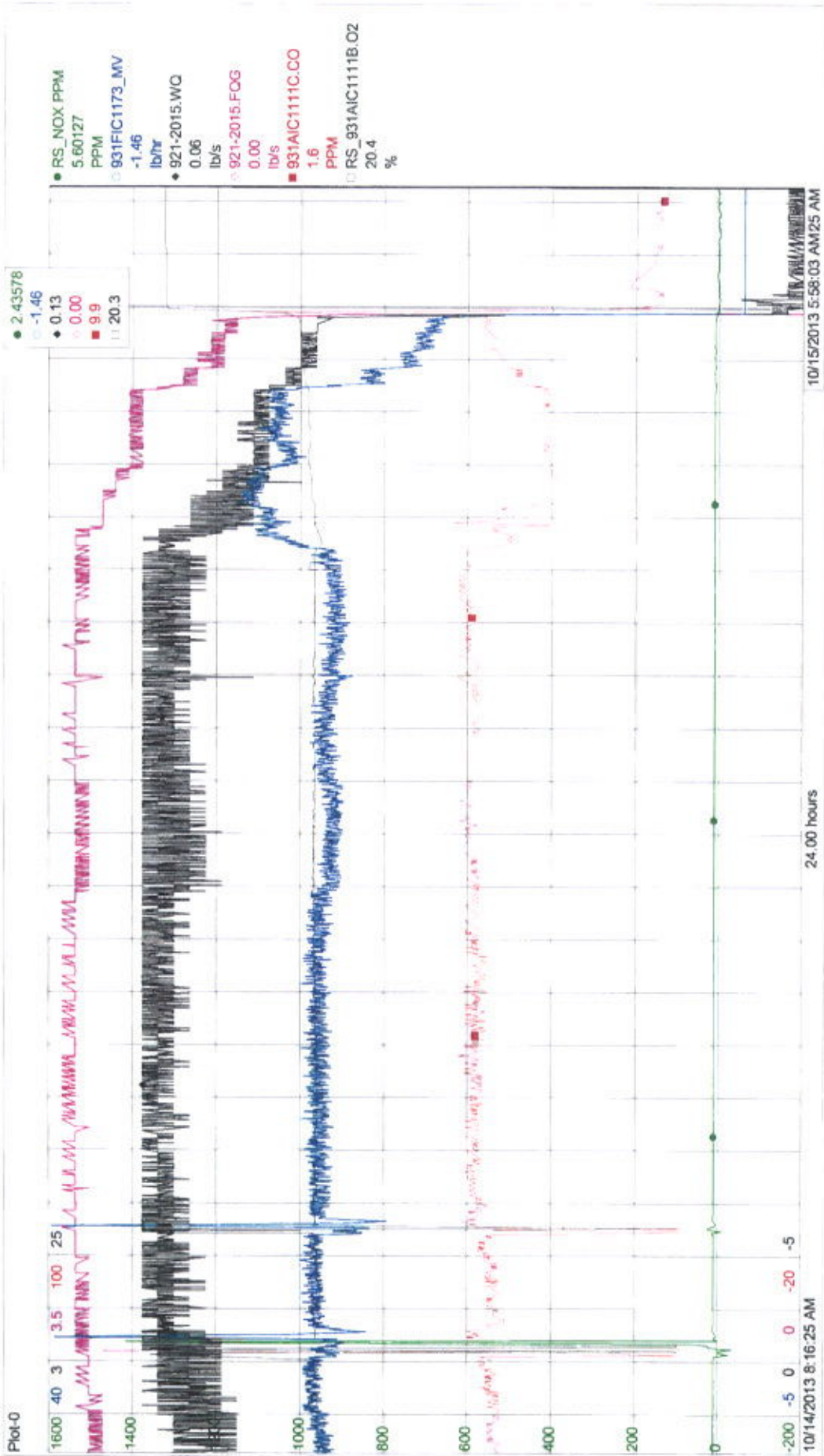
Start Time: 10/15/2013 7:00 End Time: 10/15/2013 7:00

Start Time: 10/15/2013 7:00 End Time: 10/15/2013 7:00

Time	Duct Inlet		SCR Inlet		SCR Inlet		SCR Inlet		N13 NOx		Injection		Steam to		NOx		Stack		Stack		3in		Nebraska		Nebraska		Daily Av Cogen		Daily Av Cogen							
	gas flow	MSCFH	gas flow	MSCFH	Temperature	%	ppm	NOx	ppm	rate	lb/hr	rate	lb/hr	fuel ratio	lb/hr	lb/hr	lb/hr	15% O2	ppm	CO	ppm	Average	NOx	CO	%	NOx	%	NOx	CO	lb/hr	lb/hr					
8:00	13.64	270.87	637.36	837.36	66.56	66.56	66.56	66.56	0.91	2.41	0.73	11.83	14.30	25.78	16.54	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56			
9:00	12.81	260.74	637.19	837.19	67.70	67.70	67.70	67.70	0.92	2.36	0.73	10.97	14.31	25.96	16.44	18.54	18.54	18.54	18.54	18.54	18.54	18.54	18.54	18.54	18.54	18.54	18.54	18.54	18.54	18.54	18.54	18.54	18.54			
10:00	9.84	271.47	636.87	836.87	69.48	69.48	69.48	69.48	0.91	2.44	0.74	10.95	14.35	26.14	16.39	18.54	18.54	18.54	18.54	18.54	18.54	18.54	18.54	18.54	18.54	18.54	18.54	18.54	18.54	18.54	18.54	18.54	18.54			
11:00	10.31	274.70	636.35	836.35	67.40	67.40	67.40	67.40	0.90	2.53	0.75	11.40	14.27	25.89	16.38	18.57	18.57	18.57	18.57	18.57	18.57	18.57	18.57	18.57	18.57	18.57	18.57	18.57	18.57	18.57	18.57	18.57	18.57			
12:00	13.12	276.25	642.15	842.15	67.57	67.57	67.57	67.57	0.91	2.53	0.75	11.40	14.27	25.89	16.38	18.57	18.57	18.57	18.57	18.57	18.57	18.57	18.57	18.57	18.57	18.57	18.57	18.57	18.57	18.57	18.57	18.57	18.57			
13:00	7.51	276.59	645.41	845.41	63.11	63.11	63.11	63.11	0.92	2.54	0.76	11.17	14.30	26.27	16.48	18.63	18.63	18.63	18.63	18.63	18.63	18.63	18.63	18.63	18.63	18.63	18.63	18.63	18.63	18.63	18.63	18.63	18.63			
14:00	7.42	276.59	634.76	834.76	67.50	67.50	67.50	67.50	0.91	2.65	0.76	10.99	14.40	29.14	18.54	18.47	18.47	18.47	18.47	18.47	18.47	18.47	18.47	18.47	18.47	18.47	18.47	18.47	18.47	18.47	18.47	18.47	18.47	18.47		
15:00	7.55	276.59	634.87	834.87	67.34	67.34	67.34	67.34	0.92	2.57	0.76	11.06	14.36	28.99	18.65	18.53	18.53	18.53	18.53	18.53	18.53	18.53	18.53	18.53	18.53	18.53	18.53	18.53	18.53	18.53	18.53	18.53	18.53	18.53	18.53	
16:00	6.59	277.10	634.72	834.72	67.44	67.44	67.44	67.44	0.92	2.57	0.76	11.02	14.34	28.91	18.43	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	
17:00	8.72	277.10	634.67	834.67	67.13	67.13	67.13	67.13	0.92	2.66	0.76	11.06	14.30	28.97	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	
18:00	6.45	276.03	634.60	834.60	67.30	67.30	67.30	67.30	0.93	2.57	0.76	11.00	14.45	28.99	18.54	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	
19:00	6.47	276.59	634.48	834.48	66.85	66.85	66.85	66.85	0.92	2.56	0.76	10.99	14.45	29.09	18.54	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51
20:00	6.47	276.06	633.15	833.15	66.09	66.09	66.09	66.09	0.91	2.51	0.75	10.99	14.45	29.09	18.54	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	
21:00	6.48	276.08	633.15	833.15	66.02	66.02	66.02	66.02	0.91	2.51	0.75	10.99	14.45	29.09	18.54	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	
22:00	6.48	276.76	633.26	833.26	66.47	66.47	66.47	66.47	0.92	2.54	0.75	11.00	14.43	29.05	18.47	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	18.51	
23:00	6.45	276.42	633.24	833.24	65.86	65.86	65.86	65.86	0.92	2.54	0.75	10.98	14.45	29.45	18.75	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	
0:00	6.49	276.59	633.17	833.17	65.58	65.58	65.58	65.58	0.91	2.54	0.75	10.97	14.43	30.07	18.82	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	
1:00	6.30	276.08	632.98	832.98	66.30	66.30	66.30	66.30	0.91	2.53	0.76	10.94	14.44	30.67	18.46	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	18.48	
2:00	8.14	273.01	636.73	836.73	71.73	71.73	71.73	71.73	0.93	2.46	0.74	11.05	14.35	27.11	17.18	19.63	19.63	19.63	19.63	19.63	19.63	19.63	19.63	19.63	19.63	19.63	19.63	19.63	19.63	19.63	19.63	19.63	19.63	19.63		
3:00	1.81	262.89	630.61	830.61	80.01	80.01	80.01	80.01	0.94	2.27	0.71	10.29	14.53	19.85	11.89	19.48	19.48	19.48	19.48	19.48	19.48	19.48	19.48	19.48	19.48	19.48	19.48	19.48	19.48	19.48	19.48	19.48	19.48	19.48		
4:00	0.04	253.28	623.15	823.15	77.33	77.33	77.33	77.33	0.97	2.16	0.70	9.87	14.64	19.32	16.95	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	18.56	
5:00	0.04	241.10	618.21	818.21	70.36	70.36	70.36	70.36	0.96	2.08	0.71	9.21	14.78	22.51	12.11	10.29	10.29	10.29	10.29	10.29	10.29	10.29	10.29	10.29	10.29	10.29	10.29	10.29	10.29	10.29	10.29	10.29	10.29	10.29		
6:00	0.04	192.78	602.17	802.17	51.75	51.75	51.75	51.75	0.84	1.96	0.64	7.58	15.53	36.78	14.59	9.51	9.51	9.51	9.51	9.51	9.51	9.51	9.51	9.51	9.51	9.51	9.51	9.51	9.51	9.51	9.51	9.51	9.51			
7:00	0.00	0.00	500.45	800.45	44231.48	44231.48	44231.48	44231.48	0.00	0.00	0.00	0.00	23.34	47.64	8.00	3.72	3.72	3.72	3.72	3.72	3.72	3.72	3.72	3.72	3.72	3.72	3.72	3.72	3.72	3.72	3.72	3.72	3.72			

Comment: Lessa turbine down on 10/15/13 from 6:00 AM - 7:00 AM to break the rot's turbine (after offsite repair), a total of 1 hr. Nebraska is up from 4:17 AM - 7:00 AM. Calibration completed on Nebraska CEMS prior to operation.

PRINT TIME: 10/15/2013 8:36 AM  
 NOTE: This document is valid for only ONE week after print time









ON Name	Description	Attribute	Treatment	Ruler Time	Ruler Value	Current Value	Unit	Filter	Time Offset	Form
931AIC1111A.NOX	B&W SCR INLET NOX	MV	Mom	06:02 2013-10-15	4.34	0.75	PPM			
931AIC1111C.CO	B&W BLR STACK RAW CO	MV	Mom	06:02 2013-10-15	6.73	0.16	PPM			
931AIC1111B.O2	B&W BLR RAW O2%	MV	Mean	06:02 2013-10-15	20.27	20.37	%			
931AIC1111D.NOX	B&W BLR STACK NOX	MV	Mean	06:02 2013-10-15	0.28	-0.21	PPM			
931-AIC-1111.INCAL	RSMT CEMS IN CAL	MV	Mom	06:02 2013-10-15	0	0				
931-aic-1111.trb	RSMT CEMS TROUBLE	MV	Mom	06:02 2013-10-15	1	0				

D1	30 minutes	D2	1 hour	D3	8 hours	D4	1 day	D5	10 days
D6	Positioning...	D7	Trace Control...	D8	Analyze...	D9	Trace Config...	D10	Extended Config...



# SAFETY IS ALWAYS NO. 1

DATE: 10-14-13

CAL PUMPS		Level		Feed Rate ml/min		HEBRASKA		STEAM & WATER READINGS		TURBINE		GAS & ELECTRIC READING		BOILER TEST RESULTS	
Steam 19 ml/min	Control 5.1 ml/min	Payrol 5.8 ml/min	Coast (as needed)	HEBRASKA	PERMEATE H2O	CONCENTRATE H2O	LP	SCC LP	TURBINE	MAXON	BURNER	HEBRASKA	WATTS	DAY SHIFT	NIGHT SHIFT
				08871775	71066991	70291649	188892	1872	2630650	7002450	157623	16054450	80300		
				0880382	70952375	70243020	148886	2030	2620600	1654450	215794	79720			
					YES	NO	TIME	NEBRASKA ONLINE TIME	FROM:	TO:					
					YES	NO	% FULL	NEBRASKA WARM STORAGE CHECK	YES	NO	YES	NO			
TURBINE		PSR Level		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00
TURBINE		Level		50.5	51.4	54.6	56.0	57.7	59.0	63.5	65.5	67.5	70.0	72.0	74.0
TURBINE		Temp		53	51	58	58	58	58	54	56	56	56	56	56
TURBINE		Humidity		40	30	38	38	38	38	36	36	36	36	36	36
TURBINE		Vibration (Max)		40	40	39	40	40	40	40	40	40	40	40	40
TURBINE		Stream Injection		2.38	2.31	2.56	2.62	2.62	2.50	2.50	2.42	2.62	2.62	2.62	2.62
TURBINE		Turbine L.O. Level		95	95	95	95	95	95	90	90	90	90	90	90
TURBINE		148		1485	1499	1510	1519	1515	1510	1504	1504	1502	1502	1502	1502
TURBINE		BATTERIES		135	135	135	135	135	135	135	135	135	135	135	135
TURBINE		AIR INLET DIFF 2.9N/H2O													
TURBINE		AIR INLET DIFF 7.8N/H2O													
TURBINE		L.O. DIFFERENTIAL		5	5	5	5	5	5	5	5	5	5	5	5
TURBINE		GEN. 1175		1175	1175	1175	1175	1175	1175	1175	1175	1175	1175	1175	1175
TURBINE		FIELD		208	208	208	208	208	208	208	208	208	208	208	208
TURBINE		COOLING TWR INLET		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00
TURBINE		450 Header Temp		71.0	71.0	70.9	71.1	71.0	71.1	71.1	71.1	71.0	71.0	71.0	71.0
TURBINE		HP Drum Level		1.1	0.9	2.0	0.8	0.7	1.1	1.1	1.1	1.1	1.1	1.1	1.1
TURBINE		LP Drum Level		1.0	0.0	1.2	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
TURBINE		HP Drum Pressure		483	483	485	485	483	483	483	483	483	483	483	483
TURBINE		LP Drum Pressure		149	149	149	149	147	147	147	147	147	147	147	147
TURBINE		CO		26.1	26.1	27.6	28.6	28.7	28.7	29.2	29.2	29.2	29.2	29.2	29.2
TURBINE		NOX		10.5	10.6	10.5	10.5	10.5	10.5	10.7	10.5	10.2	10.2	10.2	10.2
TURBINE		O2		14.50	14.50	14.29	14.39	14.38	14.4	14.4	14.4	14.4	14.5	14.5	14.5
TURBINE		Hot Well Level		143	148	132	150	138	143	157	163	146	146	146	146
TURBINE		Scanner Blower (ON)		Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N
TURBINE		Scanner Blower		449	449	449	449	449	449	449	449	449	449	449	449
TURBINE		1150 SET POINT		1103	1103	1103	1103	1103	1103	1103	1103	1103	1103	1103	1103
TURBINE		1103 B SET POINT		444	444	444	444	444	444	444	444	444	444	444	444
TURBINE		Scanner Blower		442	442	442	442	442	442	442	442	442	442	442	442
TURBINE		Filter Separator		232	232	232	232	232	232	232	232	232	232	232	232
TURBINE		Gas Receiver		420	420	420	420	420	420	420	420	420	420	420	420
TURBINE		Drum Level		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00
TURBINE		Drum Pressure													
TURBINE		Steam Flow													
TURBINE		Stream Temp													
TURBINE		NOX													
TURBINE		O2													
TURBINE		Blow Down Conductivity													
TURBINE		ON LINE TURBINE WATER WASH		YES	NO	CONDUCTIVITY	MHOS	BOILER FEED WATER PUMP OPERATION	NO. 1	YES	NO	NO. 2	YES	NO	

## OFFICIAL DAILY COGENERATION LOG

NAME: *M* DATE: 10-14-13

NIGHT SHIFT OPERATOR: *ROS* DRY SHIFT OPERATOR: *M*


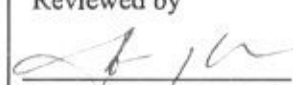

WGR 1000

BOILER FEEDWATER  
 pH 8.75 - 9.5  
 Conductivity < 5mmhos  
 Silica < 20 ppb  
 R.O.  
 Feed TDS < 1000 ppm  
 Permeate TDS < 10 ppm  
 pH (Feed 7.5)  
 CONDENSATE  
 HP-pH 8.5 - 9.5  
 Conductivity < 20mmhos  
 LP-pH 8.5 - 9.5  
 Conductivity < 20mmhos  
 HP  
 pH 9.5 - 10.5  
 Conductivity 75 - 150  
 Phosphate 9 - 15 ppm  
 Silica < 5 ppm  
 Iron ppm  
 MIXED BED  
 pH 6.0 - 7.5  
 Conductivity < 1mmhos  
 Silica < 10 ppb  
 HP Steam Test  
 Silica < 20 ppb  
 SOFTNER  
 Hardness < 1.0 ppm  
 Running (1 or 2)  
 NEBRASKA  
 pH 9.5 - 10.5  
 Conductivity 75 - 200  
 Silica  
 Phosphate 5 - 25 ppm  
 STEAM TEST  
 Silica < 20 ppb  
 PV NO.2  
 Moisture > 2000 ppm  
 LWR 2130 W

NOTES: The 34/6 in Cabin is not working  
 Very well - R.O.  
 Called APEN 2423 AM.  
 APEN - Let 3AM  
 Yes to 5:30AM  
 6:00 AM boiler is now on  
 Call 7:00 PM 5:51 AM  
 LWRink w/ps 1 X 3 Gas Strip

## Hueneme Mill Environmental Incident Report

Shaded section to be completed by the EMR

Name of Incident Preparation- startup Neb boiler- check out- for Turbine exchange in Oct		Incident Date 10/15/13	
Exact Location Incident Cogen			
Reported By C. Wilson		Estimated Start and Stop Times of Incident: @430 AM	Possible Cause: start up Nebraska Blr
Incident Type: <input type="checkbox"/> Spill Internal <input type="checkbox"/> Improper Waste		Released To	
Disposal		<input type="checkbox"/> Storm Water System <input type="checkbox"/> Secondary Containment	
<input type="checkbox"/> Spill External <input type="checkbox"/> Near miss or below spill release guidelines		<input type="checkbox"/> Process Sewer <input checked="" type="checkbox"/> Air	
X Air Emission		<input type="checkbox"/> Ground (External) <input type="checkbox"/> Ground (Inside Mill Property)	
<input type="checkbox"/> Other _____		<input type="checkbox"/> Near Miss	
		<input type="checkbox"/> Other _____	
Detailed Description of Event Started up Nebraska Boiler- in preparation of Cogen plant coming offline to remove lease LM 2500+ and Install the Mill's LM2500+ back from depot.  APCD was contacted @430 AM , 10/15/13 on start-up of Nebraska boiler. message left by C. Wilson.			
<i>(if required use additional paper and attach)</i>			
Estimated Amount Released		pH	CONSISTENCY (%)
<input type="checkbox"/> _____ Gallons <input type="checkbox"/> _____ Pounds			
<input type="checkbox"/> Other _____			
List Any External Emergency Clean Up Personnel Contacted N/A		List Any External Agencies Contacted (Agency, person and time of call.) APCD	
List Hueneme Personnel Contacted (Foreman, Mill Manager, etc.) Lars Gustavson, Rudy Rehbein, Robyn Lebrilla, Victor Kumpera		Any Acute or Chronic Health Risks (refer to MSDS)N/A	
Describe Any Emergency Response Actions N/A			
Suggestions to Prevent Reoccurrence			Estimated Completion Date
1. N/A			1.
2.			2.
3.			3.
4.			4.
Root Cause after investigation  Maintenance issue- reported to APCD- start up of Nebraska Boiler.		Severity Level (level 1 and 2 must be tracked through SHIMS) <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4	
Investigated By: Charlie Wilson		Investigated Date 10/15/13	
<u>Follow Up</u>		<u>By When</u>	<u>Completion Date</u>
Issued by   Department Manager	Reviewed by   Technical Superintendent 10/16/13	Approved by   Mill Manager 10/16/2013	

Print Time: 10/16/2013 12:31:51 PM

Note: This document is valid for only ONE week after print time!

**NEW**  **INDY**  
**CONTAINERBOARD**

October 17, 2013

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

Subject: Nebraska CEMS failed O2 calibration

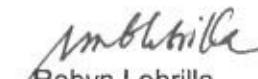
Dear Mr. Olson:

This letter is a follow up on the call made by Charlie Wilson to the VCAPCD Breakdown Center Hotline on October 15, 2013 at about 6:00 PM.

The Nebraska CEMS manual O2 calibration failed at 11:22 AM on October 15, 2013. During troubleshooting, it was found that the O2 sample probe was affected by high temperature in the area it was located. Additional cooling in the area had resolved the issue. A passing manual calibration was completed at about 6:07 PM on October 15, 2013. There was no excess emission during the 6.75-hr duration of CEMS O2 monitor malfunction. The Nebraska boiler was shutdown on October 17, 2013 at about 11:00 AM since the mill's turbine was back in service.

The Daily Emission Sheet, PI trends, DCS trends, Cogen Report and Environmental Incident Report have been provided for your review. If you have any questions or require any additional information, please call me at (805) 271-7284.

Sincerely,



Robyn Lebrilla  
Environmental Engineer

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**NEW INDY OXNARD, LLC**

5936 PERKINS ROAD • OXNARD, CALIFORNIA 93033 • WWW.NEWINDYCONTAINERBOARD.COM  
PHONE (805) 986-3881 • FAX (805) 488-5186



Ventura County  
Air Pollution  
Control District

## RESPONSIBLE OFFICIAL'S CERTIFICATION FORM

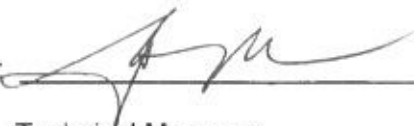
Ventura County APCD Rule 33.9 requires that "any document, including reports, schedule of compliance progress reports and compliance certifications, required by a Part 70 permit shall be certified by a responsible official." Therefore, this form shall be signed by the company's Responsible Official and 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:

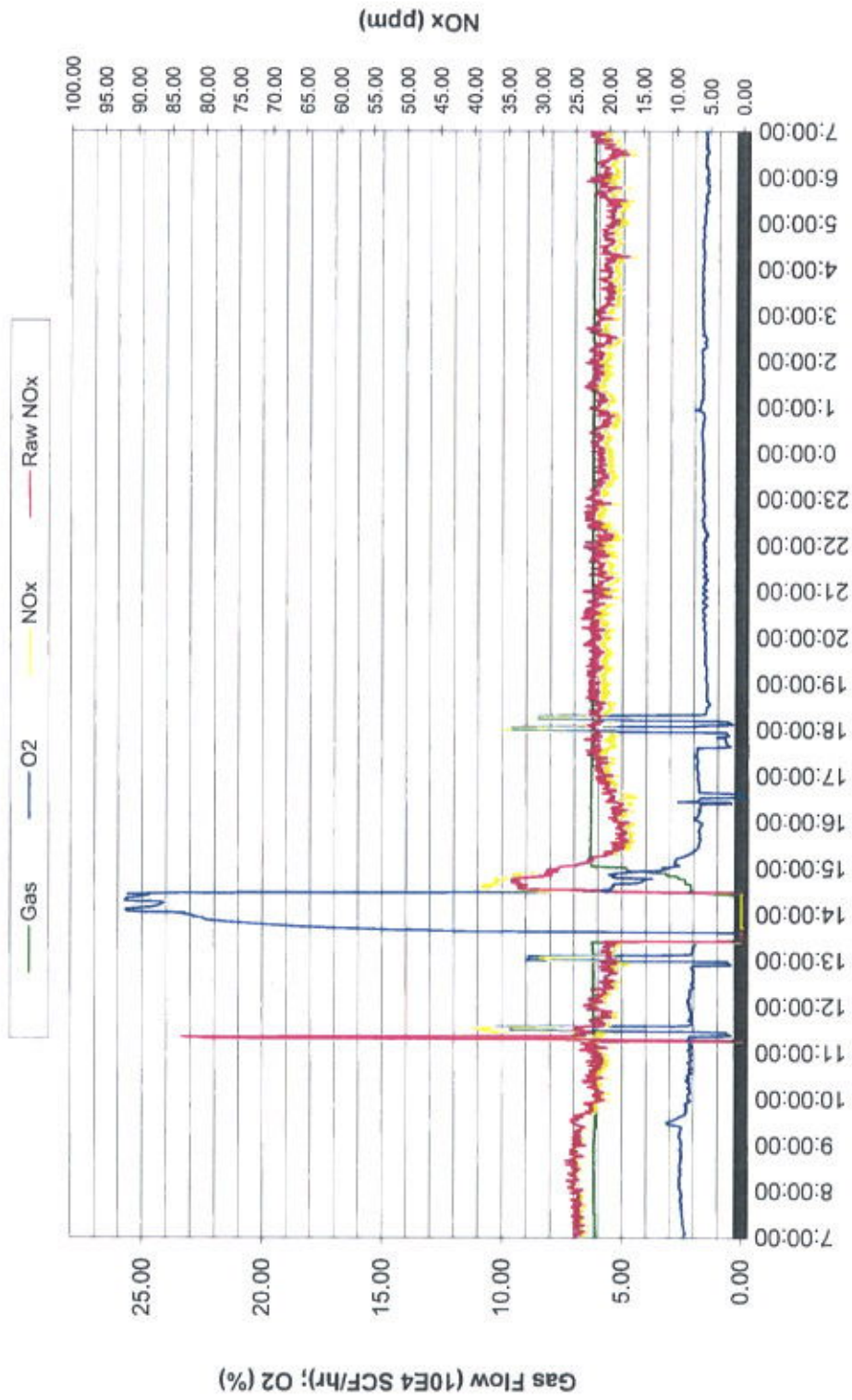
Lyle Olson  
Air Quality Engineer  
Ventura County Air Pollution Control District  
669 County Square Drive  
Ventura, CA 93003

### 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: 	10/18/2013
Title: <u>Technical Manager</u>	

# Nebraska Boiler - Daily Environmental Report

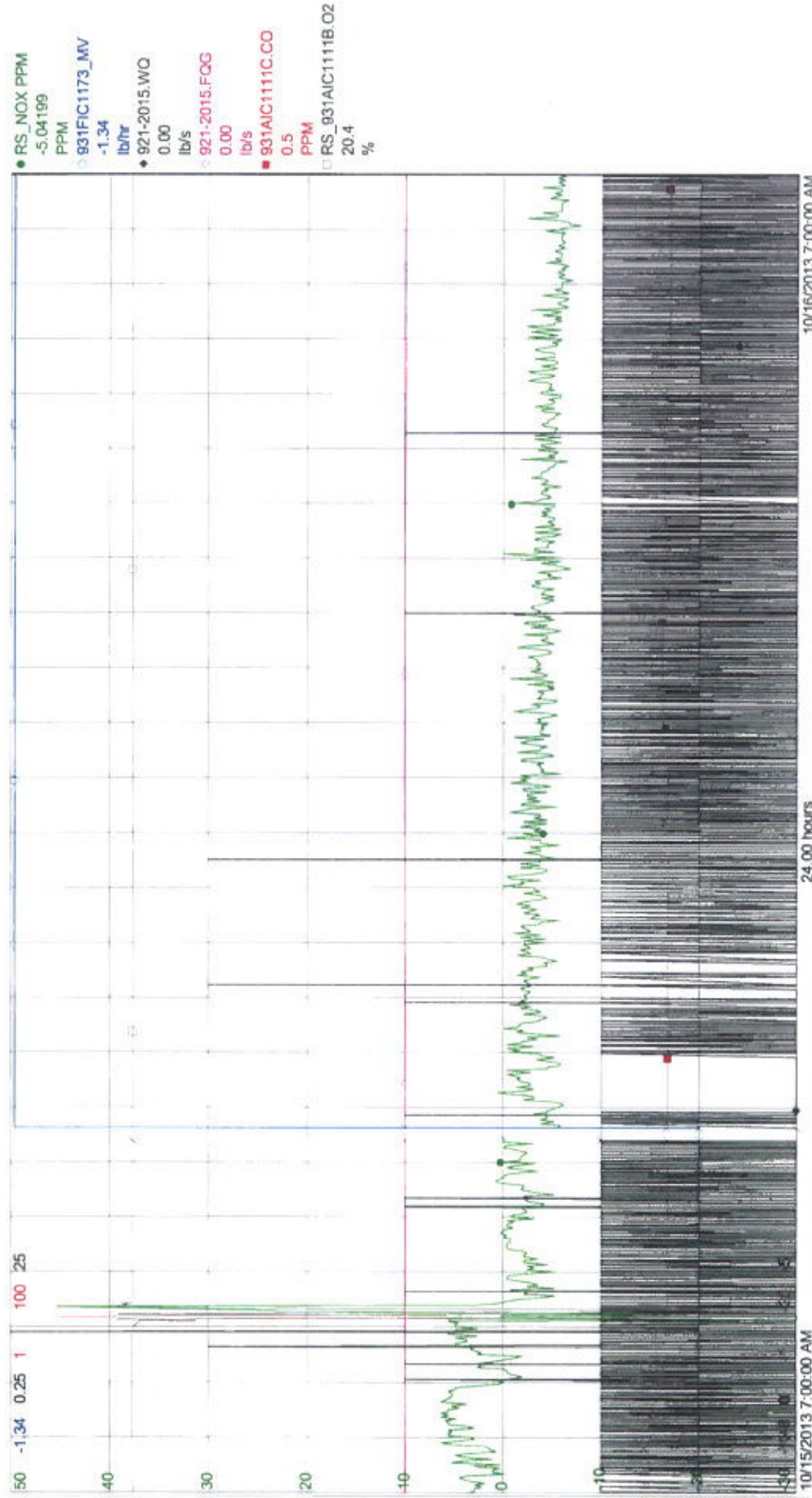


Period: 10/15/2013 - 10/16/2013



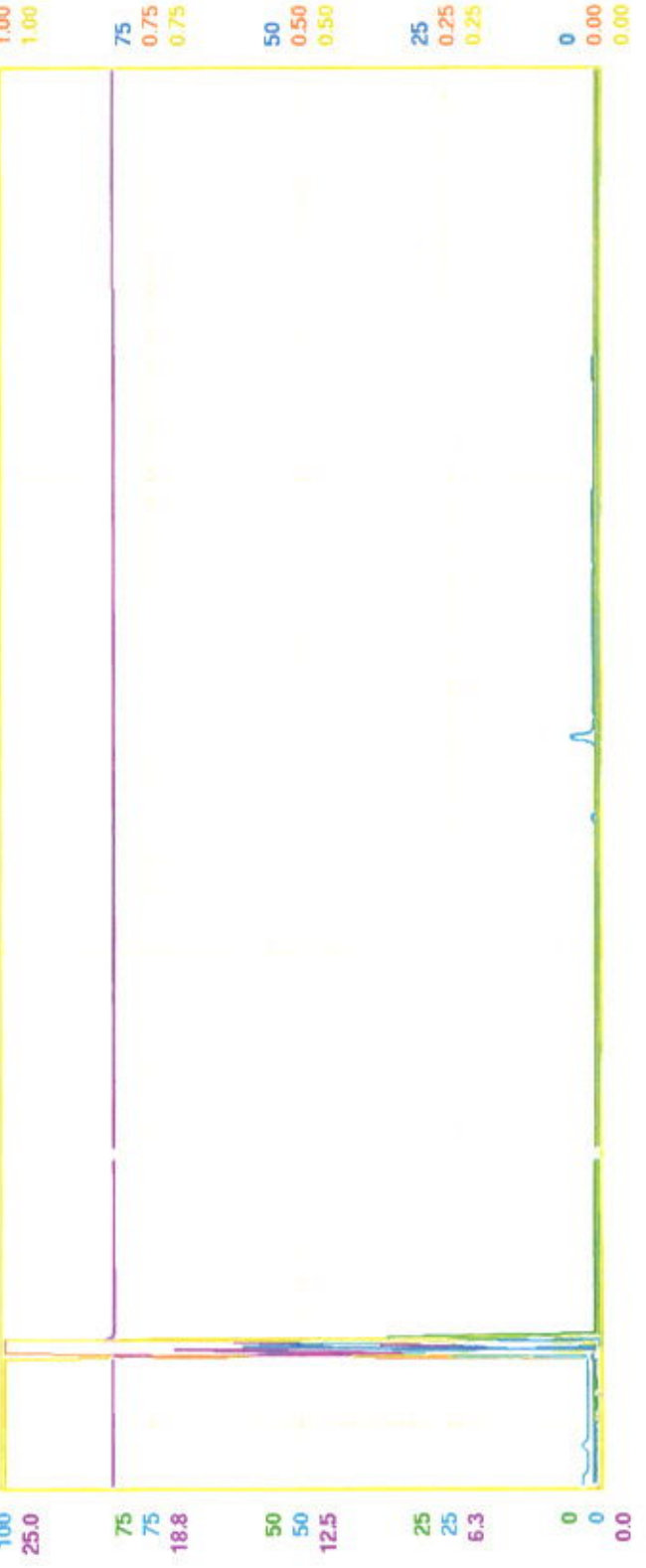


Plot-0



10/15/2013 7:00:00 AM 24.00 hours 10/16/2013 7:00:00 AM

RSMT\_4-20MA ROSEMOUNT CEMS VALUES



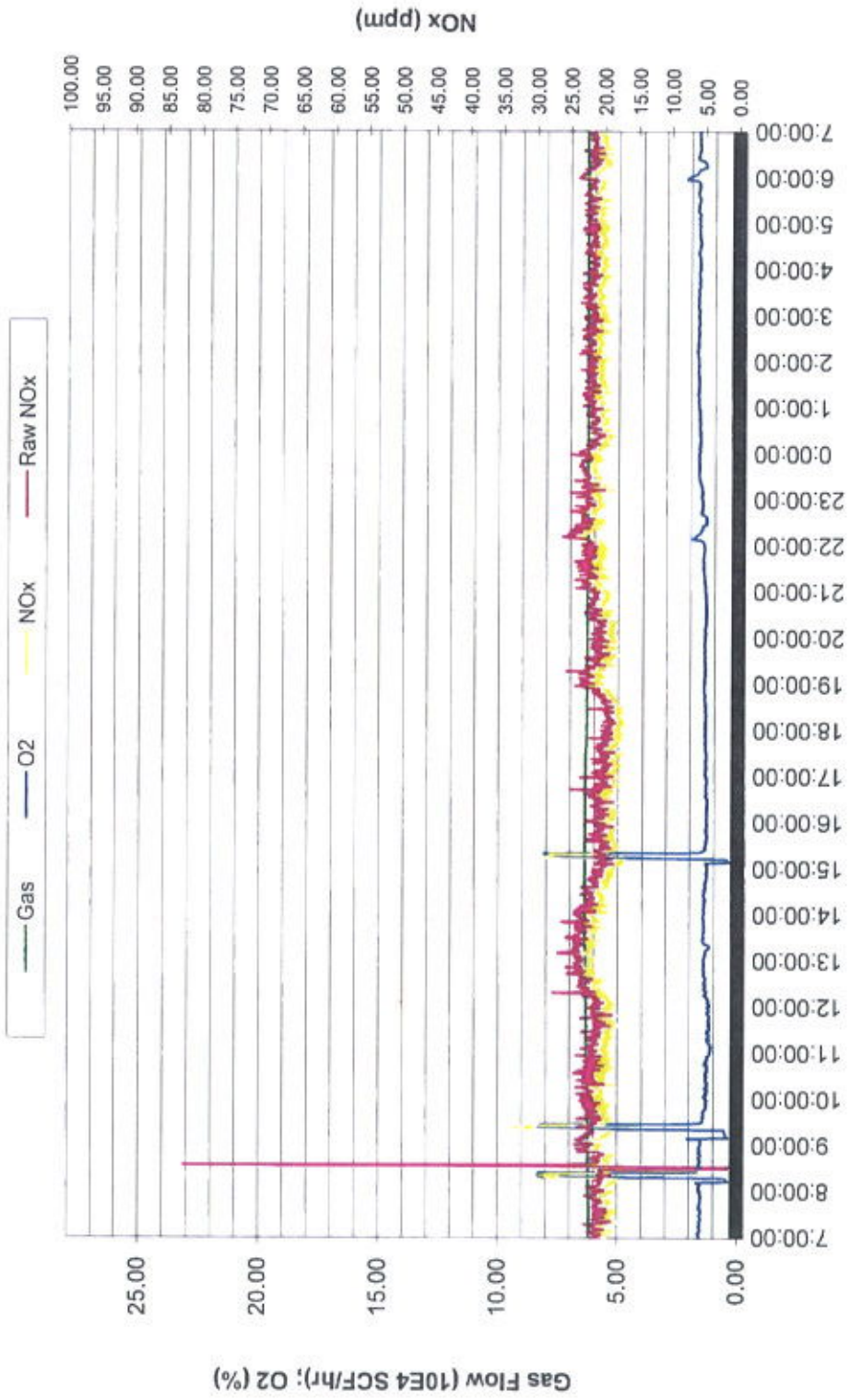
ON/Name	Description	Attribute	Treatment	Ruler Time	Ruler Value	Current Value	Unit	Filter	Time Offset	Form
931AIC1111A.NOX	B&W SCR INLET NOX	MV	Mom	07:58 2013-10-15	0.58	0.75	PPM			
931AIC1111C.CO	B&W BLR STACK RAW CO	MV	Mom	07:58 2013-10-15	2.58	0.18	PPM			
931AIC1111B.O2	B&W BLR RAW O2%	MV	Mean	07:58 2013-10-15	20.41	20.37	%			
931AIC1111D.NOX	B&W BLR STACK NOX	MV	Mean	07:58 2013-10-15	0.28	-0.21	PPM			
931-AIC-1111.INCAL	RSMT CEMS IN CAL	MV	Mom	07:58 2013-10-15	0	0				
931-aic-1111.trb	RSMT CEMS TROUBLE	MV	Mom	07:58 2013-10-15	1	0				

D1	30 minutes	D2	1 hour	D3	8 hours	D4	1 day	D5	10 days
D6	Positioning...	D7	Trace Control...	D8	Analyze...	D9	Trace Config...	D10	Extended Config...





# Nebraska Boiler - Daily Environmental Report



Period: 10/16/2013 - 10/17/2013

DAILY ENVIRONMENTAL REPORT

10/16/2013 7:00

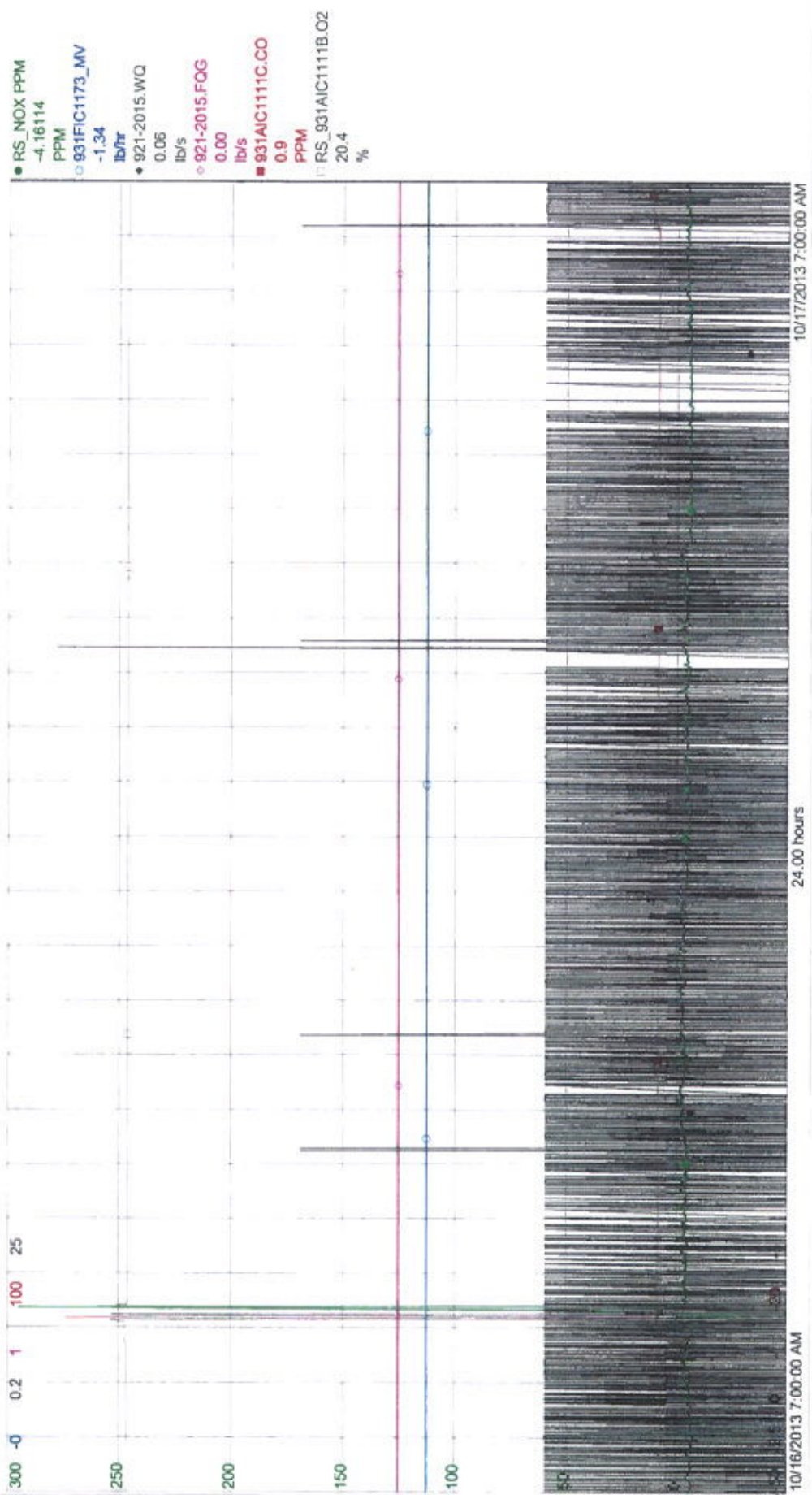
10/17/2013 7:00

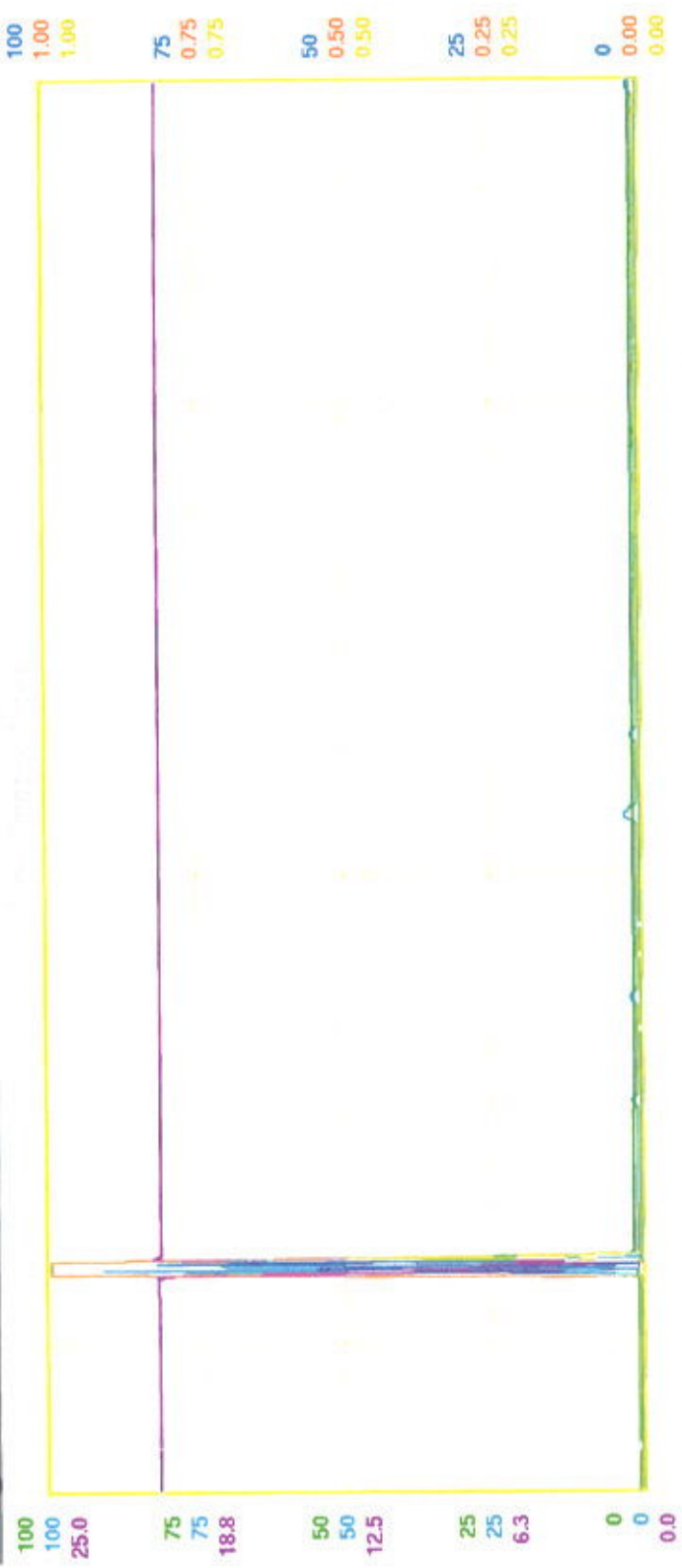
10/16/2013 7:00

Time	Duct burner gas flow MSCFH	Turbine gas flow MSCFH	S-CR Temperature °F	SCM read NOx ppm	Air volume Usage Gals	M3 NOx mass rate	Inlet NOx ppm	Steam to turb ratio	NOx lb/hr	Stack O2 %	Stack CO ppm	Stack NOx ppm	3h Running Average NOx	Hebroska CO %	Hebroska NOx %	Hebroska Corrected NOx (ppm) (1% O <sub>2</sub> )	Daily Av Capran NOx lb/hr	Daily Av Cap/Hab NOx lb/hr
8:00	-0.02	0.00	497.27	0.29	-1.34	219011.72	0.03	0.00	0.00	20.42	-4.40	8.00	-5.71	1.55	21.00	19.51	0.00	9.21
9:00	-0.02	0.00	497.20	0.28	-1.34	219011.72	0.03	0.00	0.00	20.42	-4.19	8.00	-5.50	2.18	22.03	21.04	0.00	0.00
10:00	-0.02	0.00	497.26	0.29	-1.34	219011.72	0.03	0.00	0.00	20.44	-4.82	8.00	-5.50	1.98	22.02	20.83	0.00	0.00
11:00	-0.02	0.00	497.27	1.03	-1.34	59730.46	0.03	0.00	0.00	20.37	1.38	8.00	-4.70	1.29	22.18	20.23	0.00	0.00
12:00	-0.02	0.00	497.28	1.03	-1.34	59730.46	0.03	0.00	0.00	20.37	1.30	8.00	-4.11	1.20	21.18	18.24	0.00	0.00
13:00	-0.02	0.00	497.28	0.99	-1.34	59730.46	0.03	0.00	0.00	20.37	1.79	8.00	-3.52	1.34	22.90	20.96	0.00	0.00
14:00	-0.02	0.00	497.28	0.75	-1.34	82129.39	0.03	0.00	0.00	20.37	2.48	8.00	-2.78	1.39	23.78	21.82	0.00	0.00
15:00	-0.02	0.00	497.26	0.75	-1.34	82129.39	0.03	0.00	0.00	20.37	4.24	8.00	-2.25	1.37	22.03	20.20	0.00	0.00
16:00	-0.02	0.00	497.26	0.75	-1.34	82129.39	0.03	0.00	0.00	20.37	1.73	8.00	-2.74	1.98	20.42	19.32	0.00	0.00
17:00	-0.02	0.00	497.26	0.75	-1.34	82129.39	0.03	0.00	0.00	20.37	1.73	8.00	-2.57	1.32	20.75	18.97	0.00	0.00
18:00	-0.02	0.00	497.26	0.75	-1.34	82129.39	0.03	0.00	0.00	20.37	5.19	8.00	-2.40	1.36	19.91	18.24	0.00	0.00
19:00	-0.02	0.00	497.26	0.75	-1.34	82129.39	0.03	0.00	0.00	20.37	2.38	8.00	-2.54	1.38	20.12	18.46	0.00	0.00
20:00	-0.02	0.00	497.26	0.75	-1.34	82129.39	0.03	0.00	0.00	20.37	3.91	8.00	-2.81	1.40	21.83	19.86	0.00	0.00
21:00	-0.02	0.00	497.26	0.75	-1.34	82129.39	0.03	0.00	0.00	20.37	2.08	8.00	-4.24	1.36	21.23	19.45	0.00	0.00
22:00	-0.02	0.00	497.25	0.75	-1.34	82129.39	0.03	0.00	0.00	20.37	2.05	8.00	-4.27	1.43	22.41	20.67	0.00	0.00
23:00	-0.02	0.00	497.26	0.75	-1.34	82129.39	0.03	0.00	0.00	20.37	2.08	8.00	-3.78	1.52	23.10	21.33	0.00	0.00
0:00	-0.02	0.00	497.26	0.75	-1.34	82129.39	0.03	0.00	0.00	20.37	2.77	8.00	-3.72	1.80	22.78	21.14	0.00	0.00
1:00	-0.02	0.00	497.26	0.75	-1.34	82129.39	0.03	0.00	0.00	20.37	2.82	8.00	-3.44	1.82	21.73	20.18	0.00	0.00
2:00	-0.02	0.00	497.26	0.75	-1.34	82129.39	0.03	0.00	0.00	20.37	2.08	8.00	-4.47	1.68	22.07	20.66	0.00	0.00
3:00	-0.02	0.00	497.26	0.75	-1.34	82129.39	0.03	0.00	0.00	20.37	2.08	8.00	-5.57	1.89	22.01	20.51	0.00	0.00
4:00	-0.02	0.00	497.26	0.75	-1.34	82129.39	0.02	0.00	0.00	20.37	2.08	8.00	-5.42	1.89	22.05	20.53	0.00	0.00
5:00	-0.02	0.00	497.26	0.75	-1.34	82129.39	0.03	0.00	0.00	20.37	2.08	8.00	-5.51	1.87	22.06	20.53	0.00	0.00
6:00	-0.02	0.00	497.26	0.75	-1.34	82129.39	0.03	0.00	0.00	20.37	2.08	8.00	-5.16	1.85	21.86	20.32	0.00	0.00
7:00	-0.02	0.00	497.26	0.75	-1.34	82129.39	0.03	0.00	0.00	20.37	2.08	8.00	-4.10	1.70	22.12	20.82	0.00	0.00
8:00	-0.02	0.00	497.26	0.75	-1.34	82129.39	0.03	0.00	0.00	20.37	10.51	8.00	-1.51	1.65	21.89	20.37	0.00	0.00

Leases turbine down from 16/16/13 6:00 AM to 16/17/13 7:00 AM to install the mill's turbine (after offsite repair), a total of 24 hrs. Hebraska operating for 24 hrs.

Plot-0





ON Name	Description	Attribute	Treatment	Ruler Time	Ruler Value	Current Value	Unit	Filter	Time Offset	Form
931AIC1111A.NOX	B&W SCR INLET NOX	MV	Mom	07:14 2013-10-18	0.28	54.38	PPM			
931AIC1111C.CO	B&W BLR STACK RAW CO	MV	Mom	07:14 2013-10-16	-0.41	33.25	PPM			
931AIC1111B.O2	B&W BLR RAW O2%	MV	Mean	07:14 2013-10-16	20.42	14.93	%			
931AIC1111D.NOX	B&W BLR STACK NOX	MV	Mean	07:14 2013-10-16	-0.50	10.58	PPM			
931-AIC-1111.INCAL	RSMT CEMS IN CAL	MV	Mom	07:14 2013-10-18	0	0				
931-aic-1111.trb	RSMT CEMS TROUBLE	MV	Mom	07:14 2013-10-18	0	0				

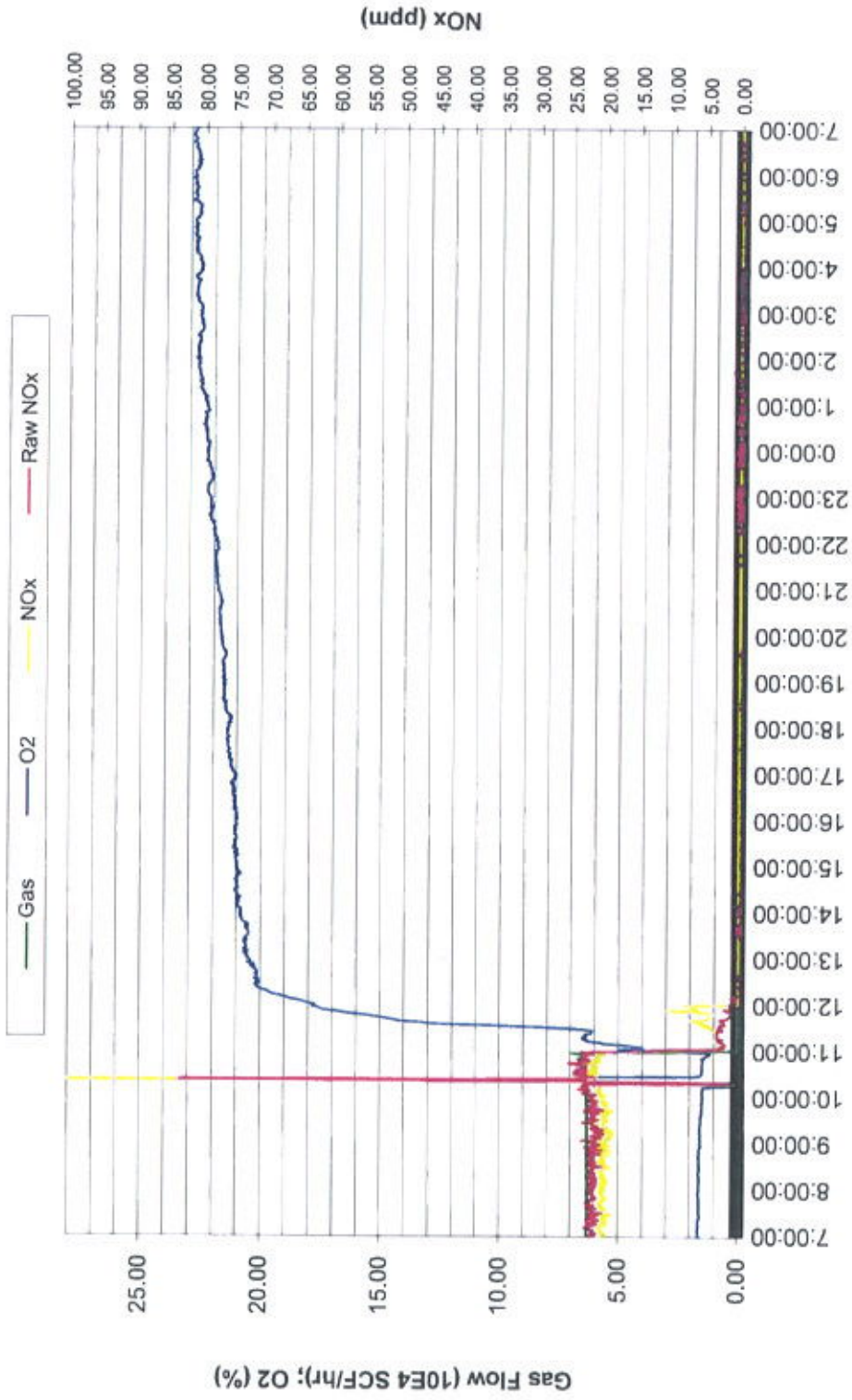
D1 30 minutes	D2 1 hour	D3 8 hours	D4 1 day	D5 10 days
D6 Positioning...	D7 Trace Control...	D8 Analyze...	D9 Trace Config...	D10 Extended Config...





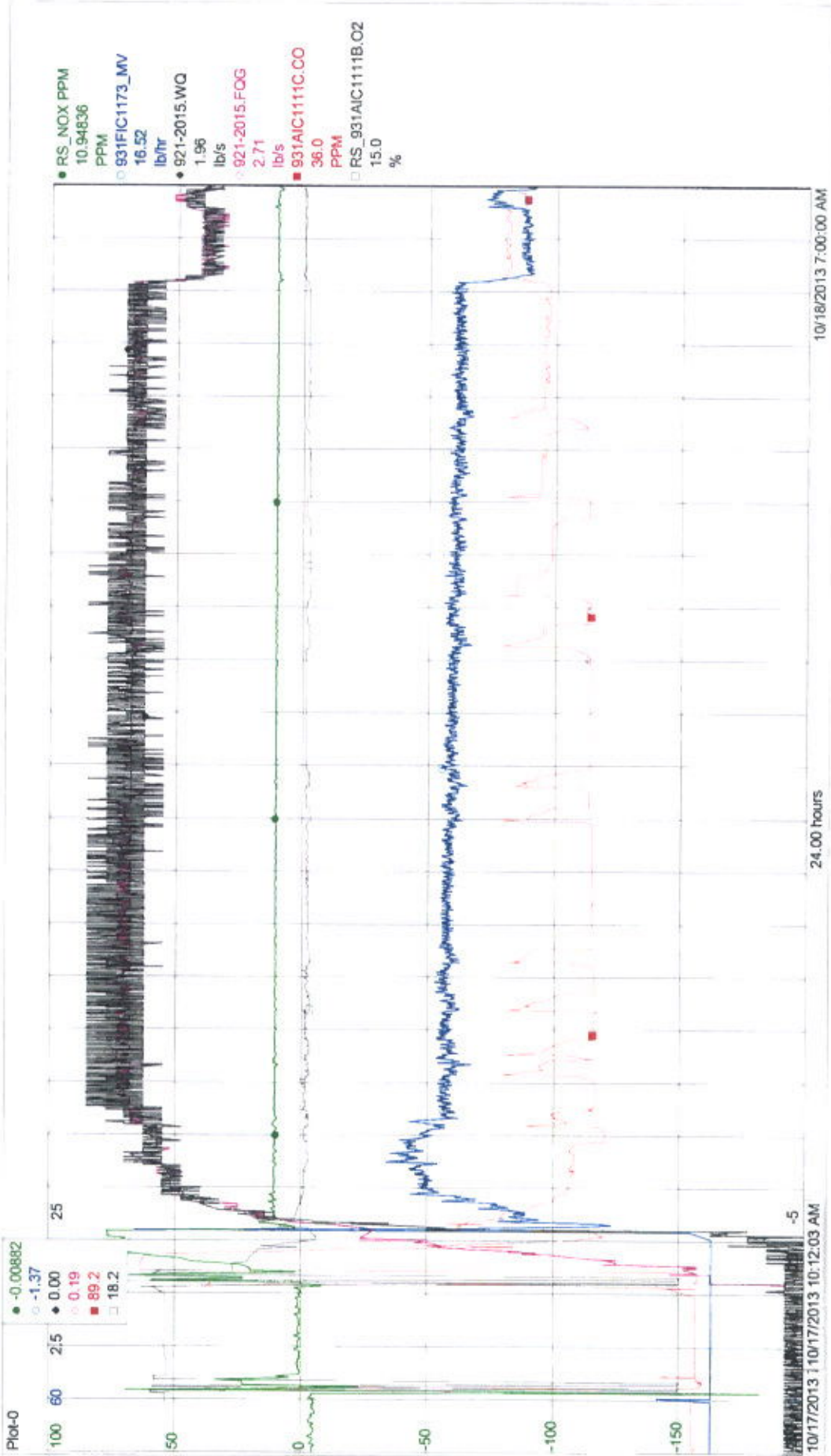


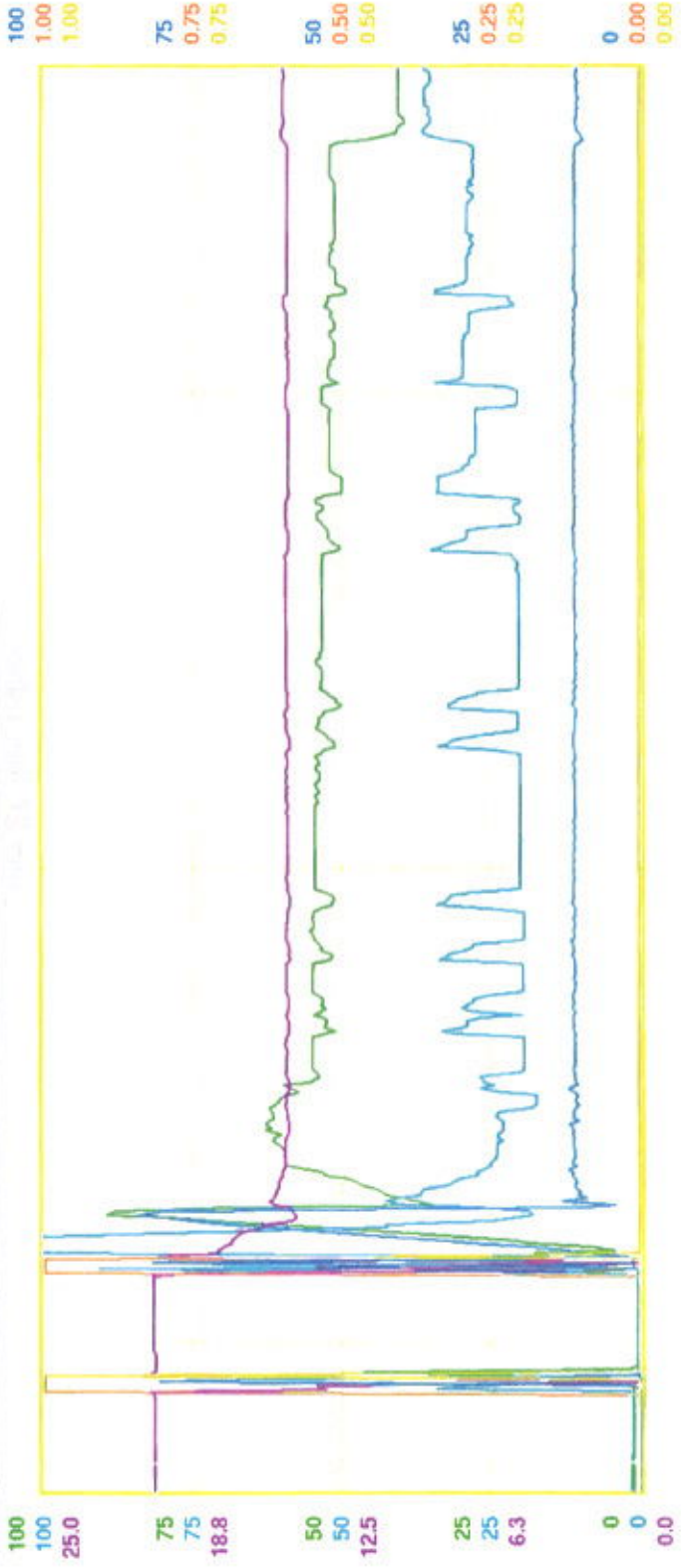
# Nebraska Boiler - Daily Environmental Report



Period: 10/17/2013 - 10/18/2013







ON Name	Description	Attribute	Treatment	Ruler Time	Ruler Value	Current Value	Unit	Fiber	Time Offset	Form
931AIC1111A.NOX	B&W SCR INLET NOX	MV	Mom	07:00 2013-10-17	0.75	54.38	PPM			
931AIC1111C.CO	B&W BLR STACK RAW CO	MV	Mom	07:00 2013-10-17	1.18	38.25	PPM			
931AIC1111B.O2	B&W BLR RAW O2%	MV	Mean	07:00 2013-10-17	20.37	14.03	%			
931AIC1111D.NOX	B&W BLR STACK NOX	MV	Mean	07:00 2013-10-17	-0.37	10.58	PPM			
931-AIC-1111.INCAL	RSMT CEMS IN CAL	MV	Mom	07:00 2013-10-17	0	0				
931-aic-1111.ttb	RSMT CEMS TROUBLE	MV	Mom	07:00 2013-10-17	0	0				


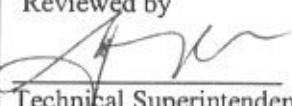
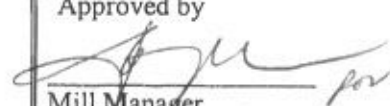
D1 30 minutes      D2 1 hour      D3 8 hours      D4 1 day      D5 10 days  
 D6 Positioning...      D7 Trace Control...      D8 Analyze...      D9 Trace Config...      D10 Extended Config...





## Hueneme Mill Environmental Incident Report

Shaded section to be completed by the EMR

Name of Incident 2013 10-15 Nebraska Boiler Oxygen Analyzer Calibration Error		Incident Date 10/15/13	
Exact Location Incident Cogen			
Reported By L. Gustavson		Estimated Start and Stop Times of Incident: 11:22 AM – 6:07 PM	Possible Cause:
Incident Type: <input checked="" type="checkbox"/> Spill Internal <input checked="" type="checkbox"/> Improper Waste Disposal <input checked="" type="checkbox"/> Spill External <input checked="" type="checkbox"/> Near miss or below spill release guidelines  <input checked="" type="checkbox"/> X Air Emission <input checked="" type="checkbox"/> Other _____		Released To <input checked="" type="checkbox"/> Storm Water System <input checked="" type="checkbox"/> Secondary Containment <input checked="" type="checkbox"/> Process Sewer <input checked="" type="checkbox"/> X Air <input checked="" type="checkbox"/> Ground (External) <input checked="" type="checkbox"/> Ground (Inside Mill Property) <input checked="" type="checkbox"/> Near Miss <input checked="" type="checkbox"/> Other _____	
Detailed Description of Event Running Nebraska Boiler as Cogen plant was offline for removal of lease LM 2500+ and installation of Mill's LM2500+ that was repaired by GE. During 10/15/2013 daily calibration O2 analyzer faulted at 1122 as calibration value did not match expected value. During troubleshooting found heat from the Nebraska Boiler was very high at the sample probe, added cooling air via a blower and duct from a cool area, recalibrated and calibration passed at 1807. APCD was contacted @ 1800 10/15/13. Message left by C. Wilson.			
<i>(if required use additional paper and attach)</i>			
Estimated Amount Released		pH	CONSISTENCY (%)
<input checked="" type="checkbox"/> _____ Gallons <input checked="" type="checkbox"/> _____ Pounds <input checked="" type="checkbox"/> Other _____			
List Any External Emergency Clean Up Personnel Contacted N/A		List Any External Agencies Contacted (Agency, person and time of call.) APCD @ 1800.	
List Hueneme Personnel Contacted (Foreman, Mill Manager, etc.) Charlie Wilson, Rudy Rehbein, Robyn Lebrilla, Victor Kumpura		Any Acute or Chronic Health Risks (refer to MSDS) N/A	
Describe Any Emergency Response Actions N/A			
Suggestions to Prevent Reoccurrence			Estimated Completion Date
1. Added cooling air via blower to analyzer probe.			1. 10/15/2013
2. Conduct two calibrations on 10/16/13 to verify proper calibration and analyzer operation.			2. 10/16/2013
3.			3.
4.			4.
Root Cause after investigation  Excessive heat at sample probe.		Severity Level (level 1 and 2 must be tracked through SHIMS) <input checked="" type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input checked="" type="checkbox"/> 3 <input checked="" type="checkbox"/> 4	
Investigated By: Lars Gustavson		Investigated Date 10/15/2013	
<u>Follow Up</u>		<u>By When</u>	<u>Completion Date</u>
Issued by  Department Manager	Reviewed by  Technical Superintendent 10/18/13	Approved by  Mill Manager 10/18/13	

Print Time: 10/17/2013 3:36:39 PM

Note: This document is valid for only ONE week after print time!

**NEW WINDY**  
**CONTAINERBOARD**

November 25, 2013

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

Subject: Nebraska Start up – November 22, 2013

Dear Mr. Olson:

This letter is a follow up on the notification call made by Rudy Rehbein to the VCAPCD Breakdown Center Hotline on November 22, 2013 at about 3:30 PM.

On November 22, 2013, the Nebraska boiler was fired to repair the cogen boiler tube leak on the economizer. The Nebraska CEMS was successfully calibrated and in operation from 3:35 PM to 8:08 PM, a total of 4.72 hours. The cogen was down from 6:00 AM to 7:45 PM, a total of 13.75 hrs.

The Daily Emission Sheet, PI and DCS trends and cogen logs have been provided for your review. If you have any questions or require any additional information, please call me at (805) 271-7279.

Sincerely,



Victor Kumpere  
Technical Manager

**NEW INDY OXNARD, LLC**

5936 PERKINS ROAD • OXNARD, CALIFORNIA 93033 • WWW.NEWINDYCONTAINERBOARD.COM  
PHONE (805) 986-3881 • FAX (805) 488-5186



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

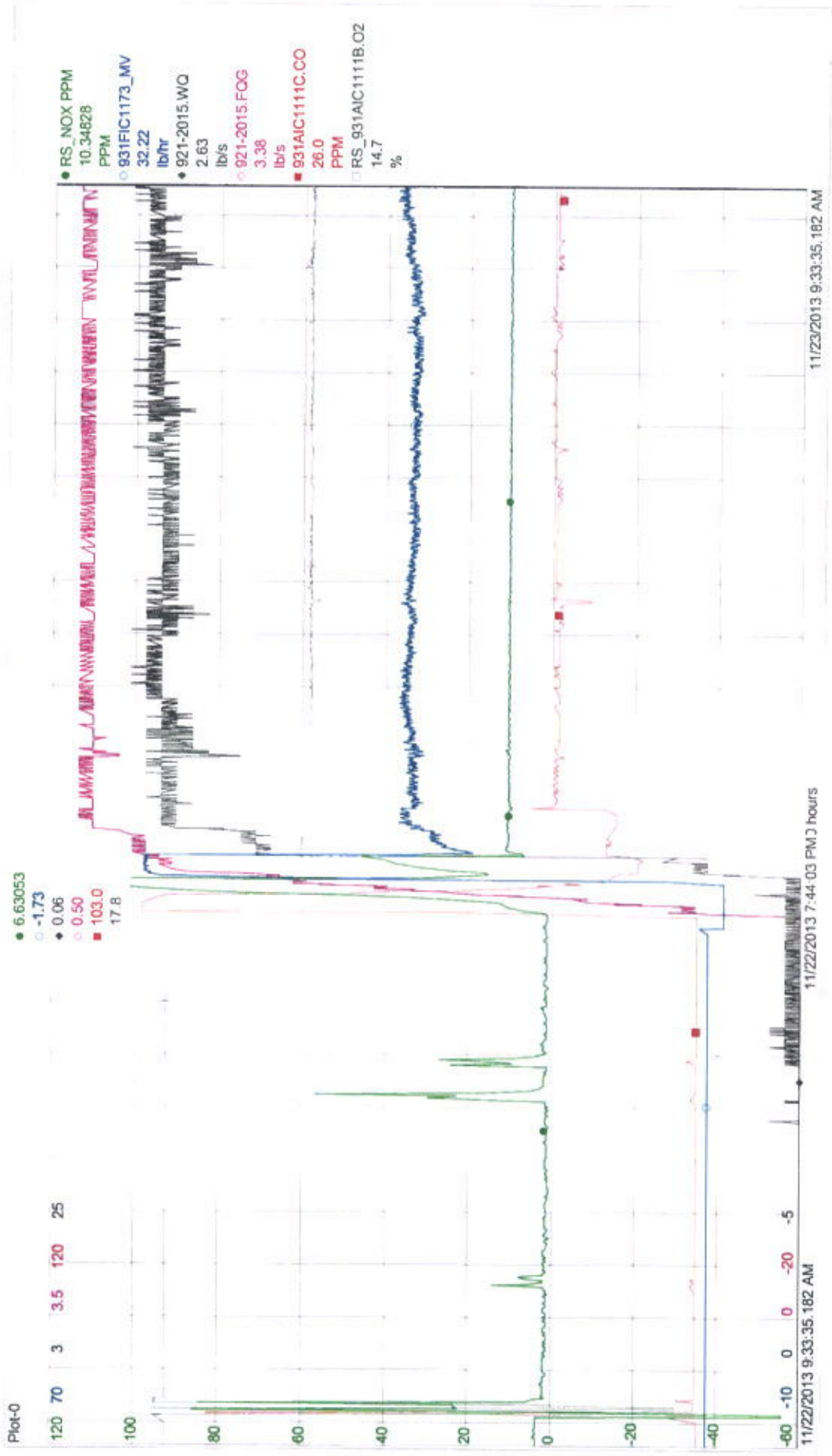
### Certification by Responsible Official

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

<p>Signature and Title of Responsible Official:</p> <p>Signature:  _____</p> <p>Title: <u>Technical Manager</u></p>	<p>Date:</p> <p>11/25/13</p>
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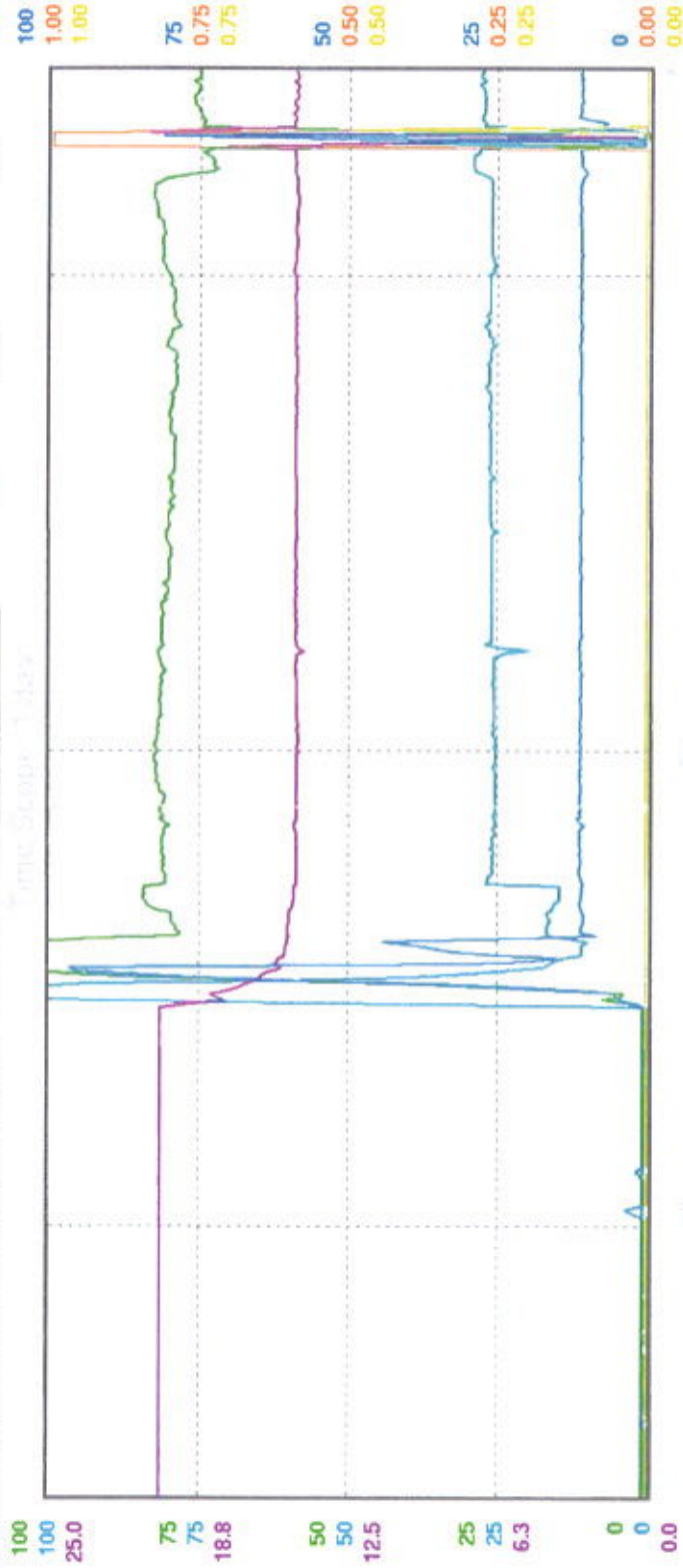


# Nebraska Boiler - Daily Environmental Report



Period: 11/22/2013 - 11/23/2013

RSMT\_4-20MA ROSEMOUNT CEMS VALUES



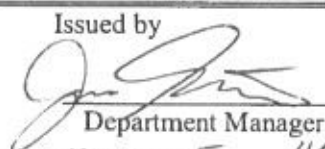
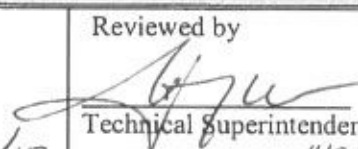
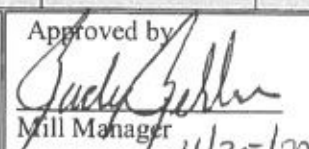
ON/Name	Description	Attribute	Treatment	Ruler Time	Ruler Value	Current Value	Unit	Filter	Time Offset
931AIC1111A.NOX	B&W SCR INLET NOX	MV	Mom	23:04 2013-11-22	80.94	75.19	PPM		
931AIC1111C.CO	B&W BLR STACK RAW CO	MV	Mom	23:04 2013-11-22	25.47	27.52	PPM		
931AIC1111B.O2	B&W BLR RAW O2%	MV	Mean	23:04 2013-11-22	14.88	14.74	%		
931AIC1111D.NOX	B&W BLR STACK NOX	MV	Mean	23:04 2013-11-22	11.00	11.01	PPM		
931-AIC-1111.INCAL	RSMT CEMS IN CAL	MV	Mom	23:04 2013-11-22	0	0			
931-aic-1111.trb	RSMT CEMS TROUBLE	MV	Mom	23:04 2013-11-22	0	0			

D1 30 minutes	D2 1 hour	D3 8 hours	D4 1 day	D5 10 days
D6 Positioning...	D7 Trace Control...	D8 Analyze...	D9 Trace Config...	D10 Extended Config...



## Hueneme Mill Environmental Incident Report

Shaded section to be completed by the EMR

Name of Incident startup Neb boiler- B&W boiler leak repair		Incident Date 11/22/13	
Exact Location Incident Cogen			
Reported By C. Wilson		Estimated Start and Stop Times of Incident: @3:35 PM – 8:08 PM	Possible Cause: B&W boiler leak
Incident Type: <input checked="" type="checkbox"/> Spill Internal <input checked="" type="checkbox"/> Improper Waste Disposal <input checked="" type="checkbox"/> Spill External <input checked="" type="checkbox"/> Near miss or below spill release guidelines <input checked="" type="checkbox"/> Air Emission <input checked="" type="checkbox"/> Other _____		Released To <input checked="" type="checkbox"/> Storm Water System <input checked="" type="checkbox"/> Secondary Containment <input checked="" type="checkbox"/> Process Sewer <input checked="" type="checkbox"/> X Air <input checked="" type="checkbox"/> Ground (External) <input checked="" type="checkbox"/> Ground (Inside Mill Property) <input checked="" type="checkbox"/> Near Miss <input checked="" type="checkbox"/> Other _____	
Detailed Description of Event Fired up Nebraska Boiler @3:35 PM – 8:08 PM to accommodate tube leak repair on economizer of B&W boiler.  APCD was contacted @330 PM..			
(if required use additional paper and attach)			
Estimated Amount Released		pH	CONSISTENCY (%)
<input checked="" type="checkbox"/> _____ Gallons <input checked="" type="checkbox"/> _____ Pounds <input checked="" type="checkbox"/> Other _____			
List Any External Emergency Clean Up Personnel Contacted N/A		List Any External Agencies Contacted (Agency, person and time of call.) APCD	
List Hueneme Personnel Contacted (Foreman, Mill Manager, etc.) Lars Gustavson, Rudy Rehbein, Robyn Lebrilla, Victor Kumpura		Any Acute or Chronic Health Risks (refer to MSDS) N/A	
Describe Any Emergency Response Actions N/A			
Suggestions to Prevent Reoccurrence			Estimated Completion Date
1. N/A			1.
2.			2.
3.			3.
4.			4.
Root Cause after investigation  Maintenance issue- reported to APCD- start up of Nebraska Boiler.		Severity Level (level 1 and 2 must be tracked through SHIMS) <input checked="" type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input checked="" type="checkbox"/> 3 <input checked="" type="checkbox"/> 4	
Investigated By: Charlie Wilson		Investigated Date 11/22/13	
Follow Up		By When	Completion Date
Issued by  Department Manager C. WILSON OUT 11/25/13 OF MILL	Reviewed by  Technical Superintendent 11/25/13	Approved by  Mill Manager 11/25/2013	

Print Time: 11/24/2013 8:54:52 AM

Note: This document is valid for only ONE week after print time!



# NEW INDY

CONTAINERBOARD

December 2, 2013

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

Subject: PI emission data loss

Dear Mr. Olson:

This letter is a follow up on the calls made to the VCAPCD Breakdown Center Hotline on Sunday, December 1, 2013 at about 2:30 PM by Victor Kumpera.

During the emission review on December 1 at around 2:00 PM, the weekend call duty member noticed that the emission data did not change for several hours. IT investigation indicated that a power disturbance had brought down the network in the server room. The network connectivity was restored after rebooting the firewalls and servers. The PI emission data was restored after PI tags were moved to a different interface as the original interface was affected by network's residual latency issues. The server room's uninterruptable power supply (UPS) was checked and a UPS support specialist is scheduled for a follow-up inspection. The mill lost PI emission data on December 1, from 6:52 AM – 4:28 PM, a total of 9.6 hours. There was no excess emission based on ABB emission data.

The Daily Emission Sheets, PI trends, DCS trends, Cogen Reports and Environmental Incident Report have been provided for your review. If you have any questions or require any additional information, please call me at (805) 271-7284.

Sincerely,



Robyn Lebrilla  
Environmental Engineer

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**NEW INDY OXNARD, LLC**

5936 PERKINS ROAD • OXNARD, CALIFORNIA 93033 • [WWW.NEWINDYCONTAINERBOARD.COM](http://WWW.NEWINDYCONTAINERBOARD.COM)  
PHONE (805) 986-3881 • FAX



Ventura County  
Air Pollution  
Control District

## RESPONSIBLE OFFICIAL'S CERTIFICATION FORM

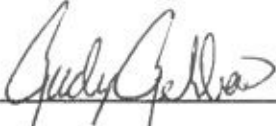
Ventura County APCD Rule 33.9 requires that "any document, including reports, schedule of compliance progress reports and compliance certifications, required by a Part 70 permit shall be certified by a responsible official." Therefore, this form shall be signed by the company's Responsible Official and 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.

<p>Signature and Title of Responsible Official:</p> <p>Signature: <u></u></p> <p>Title: <u>Mill Manager</u></p>	<p>Date:</p> <p>12/4/13</p>
--	-----------------------------



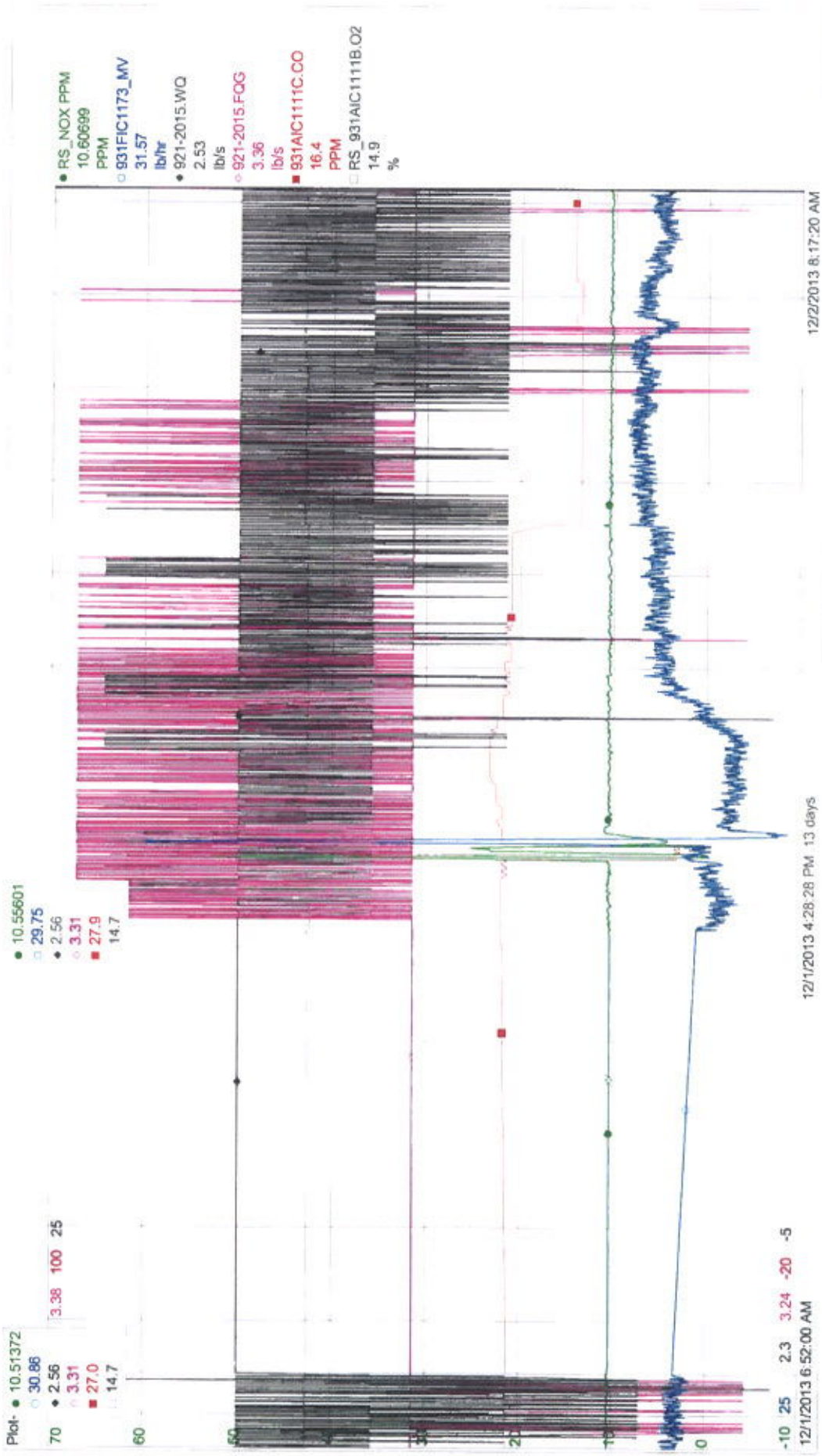
DAILY ENVIRONMENTAL REPORT

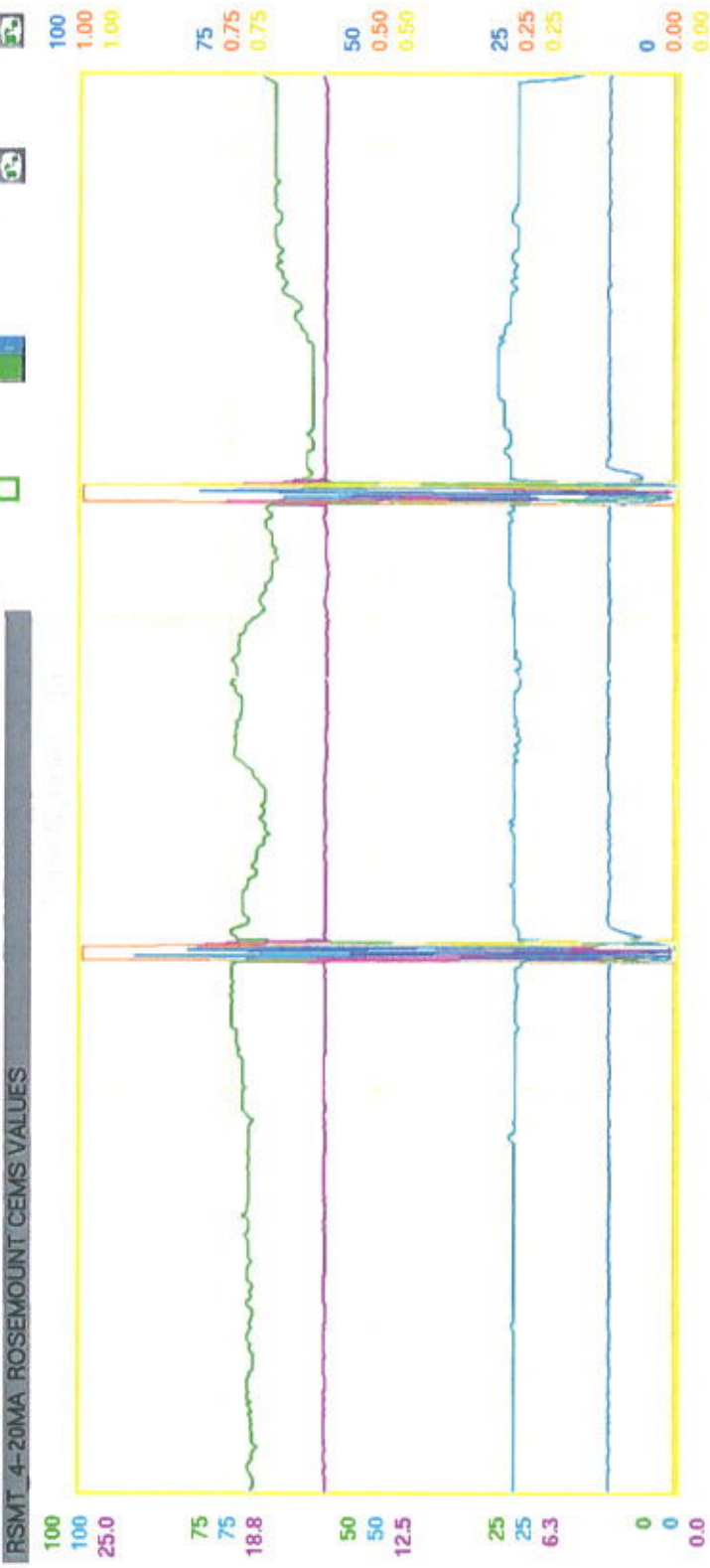
12/1/2013 7:00

12/1/2013 7:00

Time	Duct burner gas flow MSCFH	Turbine gas flow MSCFH	SAR Temperature %	SCR (NH <sub>3</sub> ) ppm	NH <sub>3</sub> (NO <sub>x</sub> ) ppm (NH <sub>3</sub> )	NO <sub>x</sub> ppm	NO <sub>x</sub> ppm	SO <sub>2</sub> ppm	NH <sub>3</sub> to SCR %	NO <sub>x</sub> ppm	Stack CO ppm	Stack CO %	Stack NO <sub>x</sub> ppm	Stack NO <sub>x</sub> ppm	3h Average NO <sub>x</sub>	NH <sub>3</sub> # CO %	NH <sub>3</sub> # NO <sub>x</sub> %	NH <sub>3</sub> # NO <sub>x</sub> %	NH <sub>3</sub> # NO <sub>x</sub> %	Daily Air Oxygen NO <sub>x</sub> lb/h	Daily Air Oxygen NO <sub>x</sub> lb/h
8:00	7.59	271.47	624.68	71.77	30.79	10.70	14.74	25.90	16.20	10.28	10.28	10.28	10.28	10.28	10.28	24.82	-0.18			10.87	10.87
9:00	7.59	271.47	625.06	71.54	30.65	10.69	14.74	25.90	16.20	10.28	10.28	10.28	10.28	10.28	10.28	24.51	-0.20				
10:00	7.59	271.47	626.24	71.41	30.58	10.69	14.74	25.91	16.20	10.28	10.28	10.28	10.28	10.28	10.28	24.48	-0.32				
11:00	7.59	271.47	627.33	71.18	30.44	10.69	14.74	25.93	16.20	10.28	10.28	10.28	10.28	10.28	10.28	24.44	-0.81				
12:00	7.59	271.47	627.41	71.05	30.37	10.69	14.74	25.94	16.20	10.28	10.28	10.28	10.28	10.28	10.28	24.38	-0.58				
13:00	7.59	271.47	627.56	70.87	30.26	10.69	14.74	25.96	16.20	10.28	10.28	10.28	10.28	10.28	10.28	24.27	-0.09				
14:00	7.59	271.47	627.65	70.69	30.18	10.69	14.74	25.98	16.20	10.28	10.28	10.28	10.28	10.28	10.28	24.30	-1.12				
15:00	7.59	271.47	627.89	70.51	30.05	10.69	14.74	25.99	16.20	10.28	10.28	10.28	10.28	10.28	10.28	24.35	-1.82				
16:00	7.59	271.47	628.35	70.33	29.95	10.69	14.74	26.01	16.20	10.28	10.28	10.28	10.28	10.28	10.28	24.35	-1.64				
17:00	7.46	272.32	628.31	68.80	29.28	10.77	14.70	26.27	16.48	10.44	10.44	10.44	10.44	10.44	10.44	24.28	-0.49				
18:00	7.34	274.25	628.29	68.43	29.02	10.84	14.75	26.62	16.88	10.63	10.63	10.63	10.63	10.63	10.63	24.33	0.34				
19:00	7.37	273.69	627.75	61.77	28.97	10.85	14.75	26.96	16.98	10.66	10.66	10.66	10.66	10.66	10.66	24.37	0.75				
20:00	7.39	272.27	628.27	61.29	28.13	10.83	14.77	27.08	17.97	10.59	10.59	10.59	10.59	10.59	10.59	24.46	0.84				
21:00	7.32	271.81	628.00	61.98	28.35	10.84	14.75	28.12	17.82	10.53	10.53	10.53	10.53	10.53	10.53	24.42	1.07				
22:00	7.33	273.69	626.10	65.46	30.58	10.83	14.74	26.19	16.48	10.55	10.55	10.55	10.55	10.55	10.55	24.53	0.26				
23:00	7.33	271.81	625.99	67.32	31.48	10.79	14.75	25.94	16.86	10.49	10.49	10.49	10.49	10.49	10.49	24.60	-0.37				
0:00	7.37	271.47	625.83	67.51	31.64	10.78	14.75	25.40	15.86	10.50	10.50	10.50	10.50	10.50	10.50	24.57	-0.63				
1:00	7.35	271.47	625.84	67.69	31.05	10.81	14.75	25.34	15.85	10.51	10.51	10.51	10.51	10.51	10.51	24.63	-0.62				
2:00	0.49	271.47	618.25	69.90	32.30	10.38	14.86	15.69	9.69	10.51	10.51	10.51	10.51	10.51	10.51	24.58	-0.74				
3:00	0.07	271.81	616.98	70.57	32.69	10.53	14.83	14.93	9.12	10.51	10.51	10.51	10.51	10.51	10.51	24.58	-0.58				
4:00	0.07	271.59	616.84	70.58	32.49	10.52	14.82	14.89	9.19	10.51	10.51	10.51	10.51	10.51	10.51	24.60	-0.19				
5:00	0.07	271.36	616.68	70.63	32.40	10.58	14.84	14.95	9.11	10.50	10.50	10.50	10.50	10.50	10.50	24.57	-0.81				
6:00	0.07	271.47	615.72	69.76	32.01	10.48	14.90	15.39	9.40	10.47	10.47	10.47	10.47	10.47	10.47	24.53	-0.87				
7:00	0.07	271.47	615.50	69.48	31.62	10.49	14.91	15.96	9.64	10.47	10.47	10.47	10.47	10.47	10.47	24.71	-0.66				

Comment: PI data loss on 12/1/13 from 8:52 AM - 4:28 PM (9.6 hrs) due to power disturbance resulting to network communication issues.





ON/Name	Description	Attribute	Treatment	Ruler Time	Ruler Val.	Current Value	Unit	File	Trace On
931AIC1111A.NOX	B&W SCR INLET NOX	MV	Mom	14:58 2013-12-01	73.4	7.34	PPM		
931AIC1111C.CO	B&W BLR STACK RAW CO	MV	Mom	14:58 2013-12-01	28.00	28.13	PPM		
931AIC1111B.O2	B&W BLR RAW O2%	MV	Mean	14:58 2013-12-01	14.70	14.77	%		
931AIC1111D.NOX	B&W BLR STACK NOX	MV	Mean	14:58 2013-12-01	10.70	10.82	PPM		
931-AIC-1111.JNCAL	RSMT CEMS IN CAL	MV	Mom	14:58 2013-12-01	0	0			
931-aic-1111.trb	RSMT CEMS TROUBLE	MV	Mom	14:58 2013-12-01	0	0			


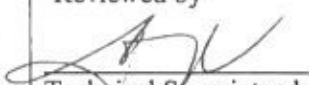
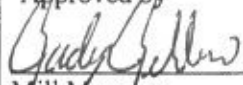
D1	30 minutes	D2	1 hour	D3	8 hours	D4	1 day	D5	10 days
D6	Positioning...	D7	Trace Control...	D8	Analyze...	D9	Trace Config...	D10	Extended Config...





## Hueneme Mill Environmental Incident Report

Shaded section to be completed by the EMR

Name of Incident Emission Data Loss		Incident 12/1/13	
Exact Location Incident Cogen			
Reported By Victor Kumpera		Estimated Start and Stop Times of Incident: 6:52 AM – 4:28 PM	Possible Cause: power disturbance
Incident Type: <input checked="" type="checkbox"/> Spill Internal <input checked="" type="checkbox"/> Improper Waste Disposal <input checked="" type="checkbox"/> Spill External <input type="checkbox"/> Near miss or below spill release guidelines <input checked="" type="checkbox"/> Air Emission <input checked="" type="checkbox"/> Other _____		Released To <input checked="" type="checkbox"/> Storm Water System <input type="checkbox"/> Secondary Containment <input checked="" type="checkbox"/> Process Sewer <input checked="" type="checkbox"/> X Air <input checked="" type="checkbox"/> Ground (External) <input type="checkbox"/> Ground (Inside Mill Property) <input checked="" type="checkbox"/> Near Miss <input checked="" type="checkbox"/> Other _____	
Detailed Description of Event  A power disturbance on Sunday, 12/1/13, brought down the network. The network connectivity was restored after rebooting the firewalls and servers. PI emission data was restored after tags were moved to a different interface that is connected to the Cogen process area. The original interface was affected due to residual latency issues with the network.  <i>(if required use additional paper and attach)</i>			
Estimated Amount Released		pH	CONSISTENCY (%)
<input type="checkbox"/> _____ Gallons <input type="checkbox"/> _____ Pounds <input checked="" type="checkbox"/> Other _____			
List Any External Emergency Clean Up Personnel Contacted N/A		List Any External Agencies Contacted (Agency, person and time of call.) APCD 12/1/13 @ 2:30 pm	
List Hueneme Personnel Contacted (Foreman, Mill Manager, etc.) Victor Kumpera, Sandy Robin		Any Acute or Chronic Health Risks (refer to MSDS) N/A	
Describe Any Emergency Response Actions Called IT support to troubleshoot issues			
Suggestions to Prevent Reoccurrence			Estimated Completion Date
1. Checking Server Room UPS – checking on batteries for possible replacement and UPS logs for any additional maintenance requirements, scheduling to bring on-site UPS support specialist to follow up.			1. 12/15/13
2. Checking natural gas generator – tested OK			2. 12/2/13
3.			3.
4.			4.
Root Cause after investigation Initial investigation – UPS failed to failover to generator after power interruption. Will get additional information after UPS support on site.		Severity Level (level 1 and 2 must be tracked through SHIMS) <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4	
Investigated By: Sandy Robin		Investigated Date 12/1/13	
Follow Up		By When	Completion Date
Issued by  Department Manager 12/2/2013	Reviewed by  Technical Superintendent 12/3/2013	Approved by  Mill Manager 12/4/13	

Print Time: 12/2/2013 2:10:04 PM

Note: This document is valid for only ONE week after print time!

# NEW INDY

CONTAINERBOARD

December 12, 2013

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

Subject: Emission data loss due to power outage

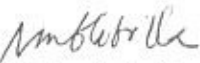
Dear Mr. Olson:

This letter is a follow up on the call made to the VCAPCD Breakdown Center Hotline on December 11, 2013 at about 8:50 AM.

The mill had total electrical power outage on December 11, 2013 at about 6:06 AM. The cogen and breaker both tripped. This incident resulted to network connection loss including DCS and PI interface. The mill lost emission data from 6:06 AM – 7:15 AM and from 8:00 AM – 8:10 AM, a total of 1.32 hrs. Cogen was down from 6:06 AM – 9:07 AM on 12/11/13, a total of 3.02 hrs. There was no excess emission since cogen was down.

The Daily Emission Sheets, PI trends, DCS trends, Cogen Reports and Environmental Incident Report have been provided for your review. If you have any questions or require any additional information, please call me at (805) 271-7284.

Sincerely,



Robyn Lebrilla  
Environmental Engineer

**NEW INDY OXNARD, LLC**

5936 PERKINS ROAD • OXNARD, CALIFORNIA 93033 • WWW.NEWINDYCONTAINERBOARD.COM  
PHONE (805) 986-3881 • FAX (805) 488-5186



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.

<p>Signature and Title of Responsible Official:</p> <p>Signature: <u>Gudy Gelman</u></p> <p>Title: <u>Mill Manager</u></p>	<p>Date: <u>12/13/2013</u></p>
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**DAILY ENVIRONMENTAL REPORT**

12/11/2013 7:00 - 12/11/2013 7:00

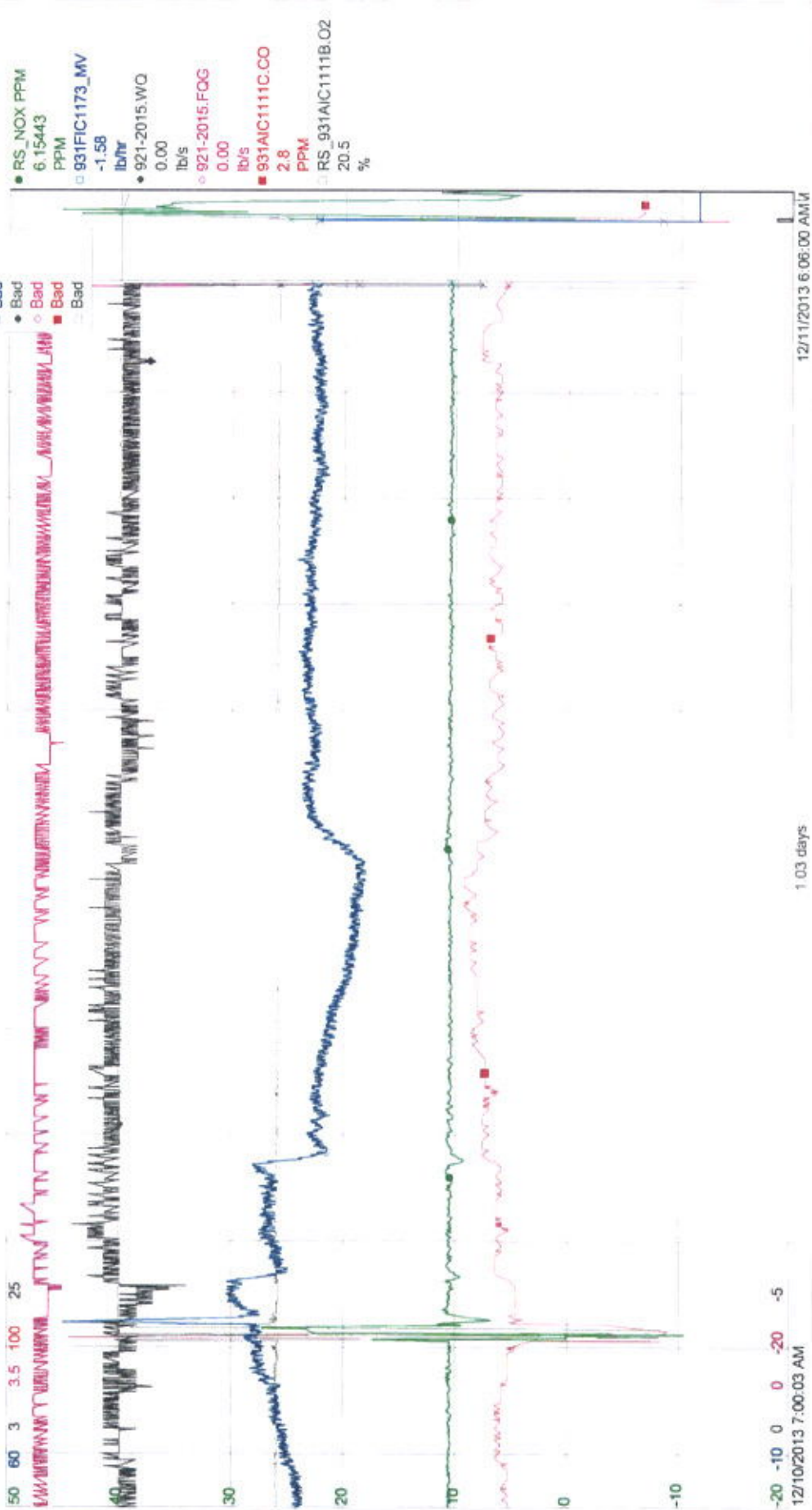
Time	Duct burner MFCFH	Turbine gas flow MFCFH	SCR Temperature %	SCR inlet NOx ppm	Amine usage Bbl	NH3 NOx mole ratio	NH3 ppm	NH3 lb/hr	NH3 lb/1000 Lbm/1000	NOx Bbl	Stack O2 %	Stack CO ppm	Stack CO %	Stack NOx ppm	Stack NOx %	3h Running NOx	Nebraska CO %	Nebraska NOx %	Nebraska Combed NOx (ppm) (3% O2)	Daily Av Cogen		Daily Av Cogen/Hub	
																				NOx	lb/h	NOx	lb/h
8:00	8.63	273.23	628.50	76.70	34.35	1.13	10.97	2.54	0.75	14.25	18.70	19.00	14.25	10.95	10.51	24.53	-1.02	10.95	10.95	10.95	10.95	10.95	
9:00	8.52	275.80	628.47	80.68	36.80	1.15	10.96	2.58	0.77	14.28	18.71	19.00	14.28	10.55	10.54	24.50	-1.07	10.55	10.55	10.55	10.55	10.55	
10:00	8.49	275.01	628.63	83.10	37.02	1.16	10.96	2.57	0.77	14.28	18.71	19.00	14.28	10.55	10.54	24.50	-0.80	10.55	10.55	10.55	10.55	10.55	
11:00	8.36	273.35	631.43	86.92	36.00	1.19	10.73	2.51	0.76	13.66	18.07	19.00	13.66	10.61	10.55	24.30	-1.30	10.61	10.61	10.61	10.61	10.61	
12:00	8.51	273.27	629.61	82.74	37.10	1.18	10.83	2.57	0.77	14.56	18.70	19.00	14.56	10.43	10.53	24.41	-1.63	10.43	10.43	10.43	10.43	10.43	
13:00	8.38	276.78	628.57	81.58	36.70	1.17	10.88	2.62	0.78	15.95	18.73	19.00	15.95	10.39	10.46	24.27	-1.40	10.39	10.39	10.39	10.39	10.39	
14:00	8.40	276.59	628.37	77.82	34.74	1.15	10.85	2.60	0.78	15.52	18.69	19.00	15.52	10.48	10.48	24.15	-1.48	10.48	10.48	10.48	10.48	10.48	
15:00	8.80	278.42	627.35	74.89	32.34	1.13	10.85	2.60	0.77	16.44	18.67	19.00	16.44	10.46	10.46	24.15	-0.70	10.46	10.46	10.46	10.46	10.46	
16:00	8.48	276.25	627.03	73.98	31.79	1.11	10.81	2.61	0.77	16.44	18.66	19.00	16.44	10.46	10.46	24.15	-0.04	10.46	10.46	10.46	10.46	10.46	
17:00	8.65	278.59	626.87	71.63	30.57	1.10	10.81	2.61	0.77	16.77	18.67	19.00	16.77	10.46	10.46	24.15	0.39	10.46	10.46	10.46	10.46	10.46	
18:00	7.11	278.59	626.49	69.51	29.26	1.09	10.96	2.60	0.77	17.20	18.64	19.00	17.20	10.48	10.48	24.17	1.01	10.48	10.48	10.48	10.48	10.48	
19:00	7.94	278.25	626.93	66.51	26.74	1.08	11.90	2.59	0.77	17.60	18.66	19.00	17.60	10.49	10.49	24.17	1.26	10.49	10.49	10.49	10.49	10.49	
20:00	8.82	275.05	626.80	72.03	30.47	1.11	11.11	2.57	0.77	16.85	18.65	19.00	16.85	10.53	10.53	24.20	0.54	10.53	10.53	10.53	10.53	10.53	
21:00	8.06	275.18	625.97	76.59	33.03	1.12	10.90	2.58	0.77	16.60	18.60	19.00	16.60	10.51	10.51	24.46	-0.29	10.51	10.51	10.51	10.51	10.51	
22:00	9.56	271.84	626.10	76.21	32.63	1.12	10.90	2.53	0.76	14.89	18.67	19.00	14.89	10.50	10.50	24.43	-0.78	10.50	10.50	10.50	10.50	10.50	
23:00	8.78	274.03	625.95	76.48	33.19	1.12	10.95	2.56	0.77	15.19	18.69	19.00	15.19	10.51	10.51	24.50	-0.88	10.51	10.51	10.51	10.51	10.51	
0:00	8.62	274.59	626.02	76.82	33.12	1.13	10.95	2.55	0.77	15.23	18.67	19.00	15.23	10.48	10.48	24.45	-0.95	10.48	10.48	10.48	10.48	10.48	
1:00	8.75	274.16	626.06	76.72	33.02	1.12	10.96	2.56	0.77	15.12	18.65	19.00	15.12	10.48	10.48	24.55	-1.02	10.48	10.48	10.48	10.48	10.48	
2:00	8.64	272.84	625.84	76.18	32.68	1.11	10.88	2.54	0.77	15.27	18.66	19.00	15.27	10.49	10.49	24.56	-1.12	10.49	10.49	10.49	10.49	10.49	
3:00	10.00	272.15	625.95	75.40	32.28	1.11	10.91	2.53	0.76	15.00	18.67	19.00	15.00	10.48	10.48	24.43	-1.06	10.48	10.48	10.48	10.48	10.48	
4:00	8.20	272.15	625.94	75.52	32.25	1.11	10.88	2.53	0.76	14.98	18.65	19.00	14.98	10.46	10.46	24.54	-0.95	10.46	10.46	10.46	10.46	10.46	
5:00	8.20	272.66	625.40	75.58	32.29	1.12	10.84	2.53	0.76	15.00	18.67	19.00	15.00	10.47	10.47	24.46	-1.02	10.47	10.47	10.47	10.47	10.47	
6:00	8.89	273.01	625.32	76.09	32.70	1.12	10.84	2.53	0.76	15.38	18.64	19.00	15.38	10.48	10.48	24.53	-1.13	10.48	10.48	10.48	10.48	10.48	
7:00	10.40	271.47	626.20	75.81	32.45	1.09	10.84	2.34	0.72	14.10	18.64	19.00	14.10	10.48	10.48	24.32	-1.13	10.48	10.48	10.48	10.48	10.48	

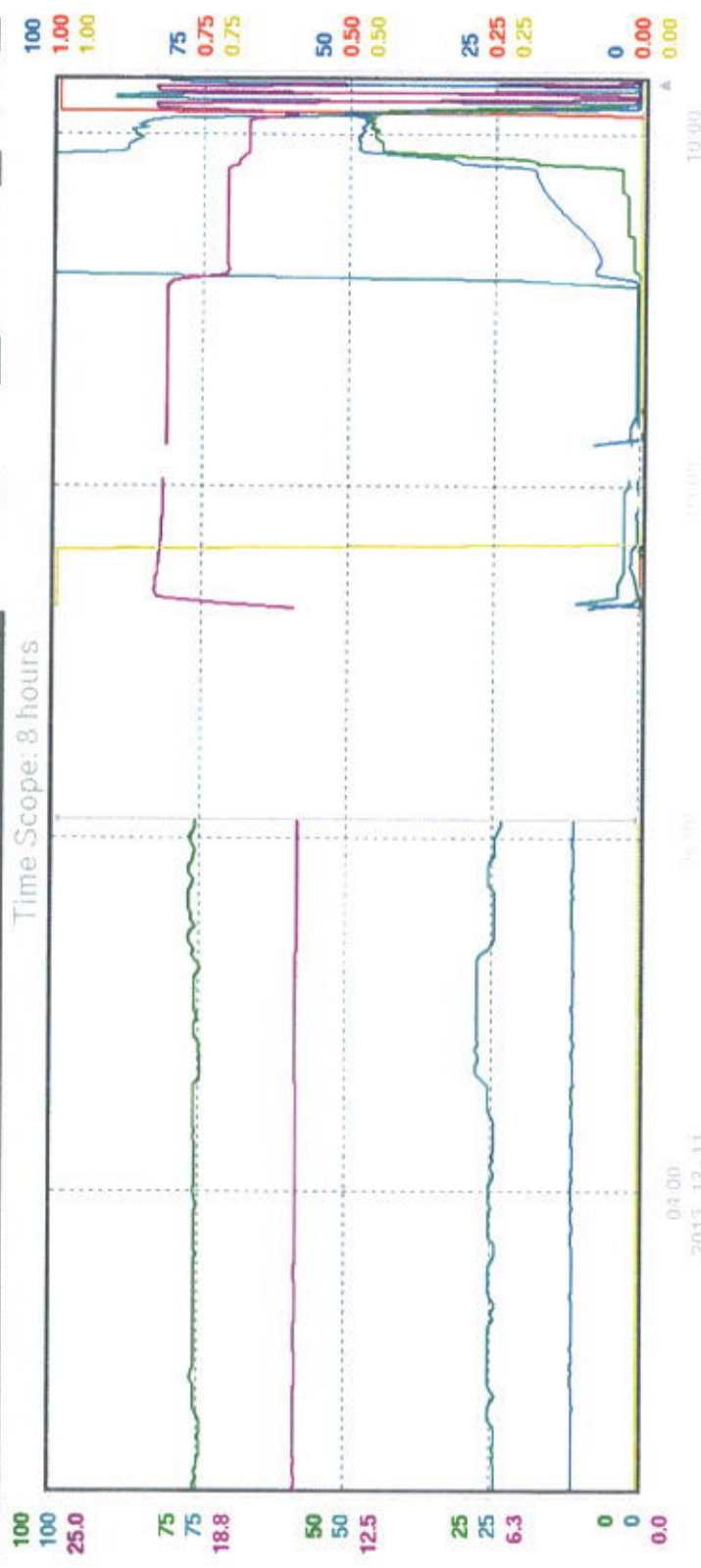
Comment: PH emission rate loss on 12/11/13 from 6:06 AM - 7:15 AM due to mill wide power outage/work connection loss, a total of 1.15 hrs - refer to attached PH trends. R. Lebrilla called APCD breakdown hotline @ 6:59 AM. Cogen down on 12/11/13 from 6:06 AM - 7:06 AM, a total of 0.9 hr.

PRINT TIME: 12/11/2013 11:14 AM  
NOTE: This document is valid for only ONE week after print time



Plot-0





ON Name	Description	Attribute	Treatment	Ruler Time	Ruler Value	Current Value	Unit	Filter	Time Offset	Form
931AIC1111A.NOX	B&W SCR INLET NOX	MV	Mom	06:06	---	0.86	PPM			
931AIC1111C.CO	B&W BLR STACK RAW CO	MV	Mom	06:06	---	0.12	PPM			
931AIC1111B.O2	B&W BLR RAW O2%	MV	Mean	06:06	---	0.11	%			
931AIC1111D.NOX	B&W BLR STACK NOX	MV	Mean	06:06	---	90.78	PPM			
931-AIC-1111.INCAL	RSMT CEMS IN CAL	MV	Mom	06:06	---	1				
931-aic-1111.trb	RSMT CEMS TROUBLE	MV	Mom	06:06	---	0				

D1 30 minutes D2 1 hour D3 2 hours D4 1 day D5 10 days  
D6 Positioning... D7 Trace Control... D8 Analyze... D9 Trace Config... D10 Extended Config...



TAL PUMPS		NEBRASKA		PERMEATE H <sub>2</sub> O		CONCENTRATE H <sub>2</sub> O		LP		HP		SCG LP		TURBINE		MAXON		BURNER		NEBRASKA		ITS	
Level	Feed Rate ml/min	Current	Pressure	Flow	Flow	Flow	Flow	Flow	Flow	Flow	Flow	Flow	Flow	Flow	Flow	Flow	Flow	Flow	Flow	Flow	Flow	Flow	Flow
Skimole 3.5 ml/min		110	107.4	7.30	4814	730	40274																
Contra 5.3 ml/min		109	82.6	2.80	6091	7299	4954	20749															
Polymer 6.8 ml/min																							
Caustic (as needed)																							
TURBINE		FSR	%	50.6	57.2	51.9		15.00	17.00	19.00	21.00	23.00	1.00	3.00	5.00								
GENERATOR		Inlet Temp	°F	54	59	64		6.91	59.0	57	55.4	56.3	57	56.5									
COGEN BOILER		Humidity	%	1.2	1.2	0.3		12.1	26.2	37.2													
COMPRESSORS		Vibration (Max)	MILS	1.9	2.0	1.9		2.0	1.9	3.2													
NEBRASKA BOILER		Steam Injection	#/SEC	3.57	2.62	2.38		2.67	2.66	2.62													
NEBRASKA BOILER		Turbine L.O. Level	%	100	100	100		100	100	100													
NEBRASKA BOILER		14B	°F	1456	1473	1485		1463	1460	1451													
NEBRASKA BOILER		BATTERIES	134																				
NEBRASKA BOILER		AIR INLET DIFF 3.2/2V/M20	HP																				
NEBRASKA BOILER		L.O. DIFFERENTIAL	PSI	6																			
NEBRASKA BOILER		Gen. Bearing Drain	°F	152	152	156		156	156	154													
NEBRASKA BOILER		L.O. Supply	°F	122	122	126		126	126	124													
NEBRASKA BOILER		Gen. Vibration (Max)	IPS	3.4	3.8	4.2		3.6	3.6	3.4													
NEBRASKA BOILER		Tie Line	MW	1743	1351	1297		1350	1366	1348													
NEBRASKA BOILER		GEN. 1400	AMPS	205																			
NEBRASKA BOILER		FIELD	COOLING TWR INLET	76																			
NEBRASKA BOILER		FIELD	COOLING TWR INLET	110																			
NEBRASKA BOILER		FIELD	COOLING TWR INLET	110																			
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Plot-0

● 4.39798  
○ -1.34

● 0.06  
○ 0.13  
■ 5.3  
■ 19.7

80 40 120 25

70

60

50

40

30

20

10

0

-10 -5 0 5

12/11/2013 9:07:00 AM

24.00 hours

12/12/2013 7:00:00 AM

RS\_NOX PPM  
10.50796

PPM  
831FIC1173\_MV  
33.93

lb/hr  
921-2015.WQ  
2.28

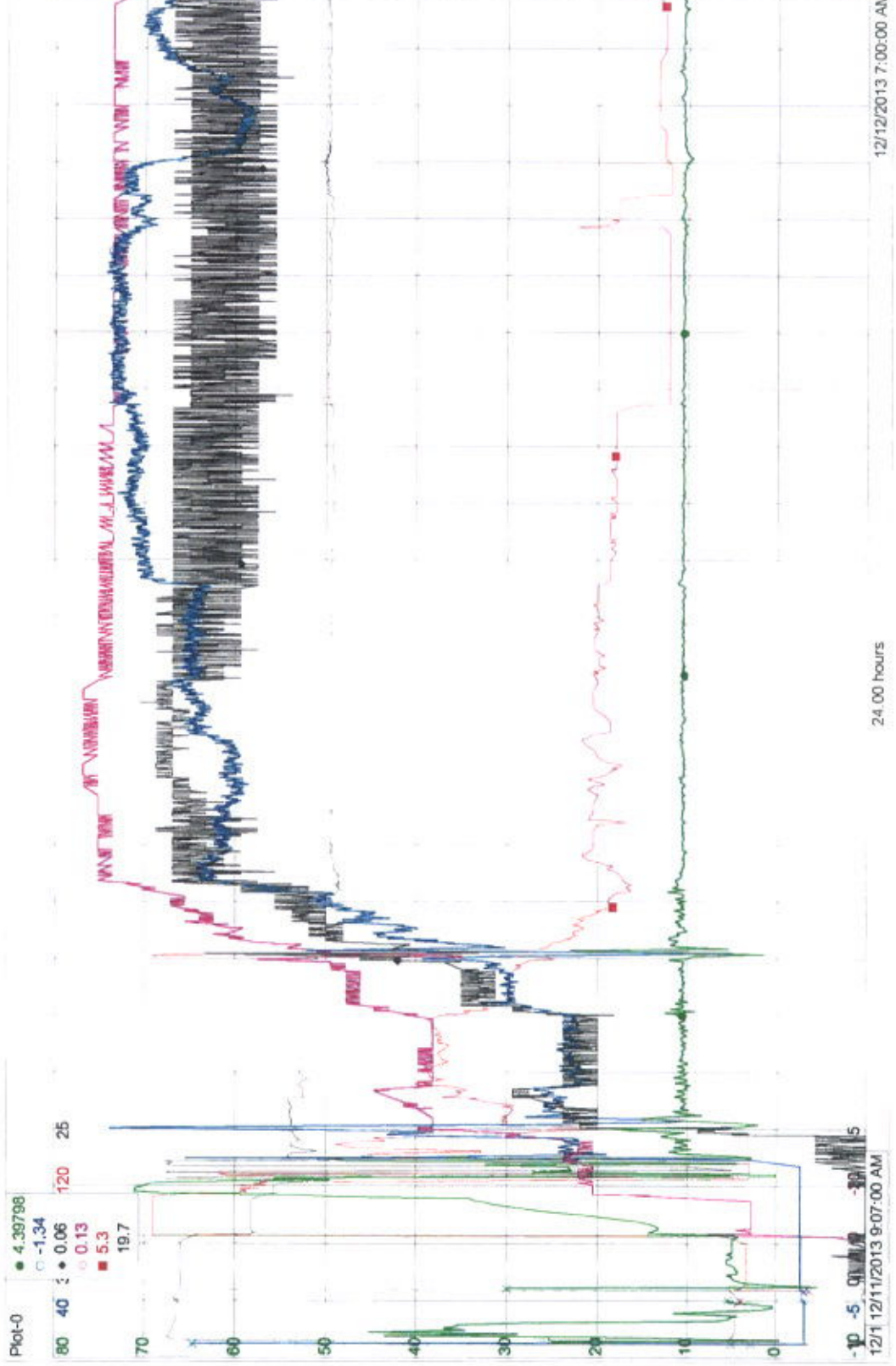
lb/s  
921-2015.FOG  
3.22

lb/s  
931AIC1111C.CO  
18.7

PPM  
RS\_931AIC1111B.O2  
14.9

%

12/12/2013 7:00:00 AM





TURBINE	NEBRASKA				NEBRASKA WARM STORAGE CHECK				BOILER FEEDWATER				DAY SHIFT		NIGHT SHIFT			
	Level	Flow	Pressure	Temp	PSI	HP	REC	DIFF	19:00	21:00	23:00	3:00	5:00	PH	COND	PH	COND	
Steamrate 35 m3/min	110.6	2.9	7.7	13.888	7.3088	7.3	10.294	14.9	14.9	14.9	14.9	14.9	14.9	7.258	15.0	5.85	9.40	
Control 5.3 ml/min	10.10	7.46	7.73	4.814	7.30	10.294	14.9	14.9	14.9	14.9	14.9	14.9	14.9	6.43	6.50	5.85	8.63	
Papmer 6.8 ml/min																		
Loatic (as needed)																		
FSR	%	11:00	15:00	17:00	19:00	21:00	23:00	3:00	5:00									
Inlet Temp	°F	34.7	42.1	57.6	52.1	50.1	44.7	44.5	43.9	43.0	43.0	43.0	43.0	43.0	43.0	43.0	43.0	43.0
Humidity	%	5.8	5.6	5.4	5.4	5.2	6.2	6.2	6.0	6.0	6.0	6.0	6.0	6.0	6.0	6.0	6.0	6.0
Vibration (Max)	M/S	-0.5	8.7	1.7	7.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7	6.7
Steam Injection	#/SEC	1.0	1.5	1.4	1.2	1.6	1.6	1.6	1.6	1.6	1.6	1.6	1.6	1.6	1.6	1.6	1.6	1.6
Turbine L.D. Level	%	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100
TAB	Y	12.80	13.98	14.60	14.47	14.65	14.65	14.65	14.65	14.65	14.65	14.65	14.65	14.65	14.65	14.65	14.65	14.65
Gen. Bearing Drain	F																	
L.D. Supply	T																	
Gen. Vibration (Max)	IPS	4.8	3.5	3.0	1.26	1.26	1.26	1.26	1.26	1.26	1.26	1.26	1.26	1.26	1.26	1.26	1.26	1.26
Tie Line	MW	12.92	13.55	13.44	12.89	12.96	13.03	13.08	12.96	12.96	12.96	12.96	12.96	12.96	12.96	12.96	12.96	12.96
450 Inlet Temp	Y	7.00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00	5:00						
HP Drum Level	IN	0.4	0.7	1.0	0.9	1.0	0.9	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
LP Drum Level	IN	0.6	2.1	1.0	1.2	0.6	0.9	0.5	1.2	1.2	1.2	1.2	1.2	1.2	1.2	1.2	1.2	1.2
HP Drum Pressure	PSI	145	147	149	148	148	147	147	146	146	146	146	146	146	146	146	146	146
LP Drum Pressure	PSI	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
CO	PPH	15.59	14.84	14.71	14.84	14.97	14.78	14.91	14.91	14.91	14.91	14.91	14.91	14.91	14.91	14.91	14.91	14.91
MOX	PPH	1.30	1.58	1.58	1.35	1.40	1.48	1.48	1.48	1.48	1.48	1.48	1.48	1.48	1.48	1.48	1.48	1.48
Hot Well Level	%	11:50	11:50	11:50	11:50	11:50	11:50	11:50	11:50	11:50	11:50	11:50	11:50	11:50	11:50	11:50	11:50	11:50
Filter Separator	PSI	240	235	229	231	231	233	235	235	235	235	235	235	235	235	235	235	235
Gas Receiver	PSI	425	425	425	426	426	426	426	426	426	426	426	426	426	426	426	426	426
Drum Level	IN																	
Drum Pressure	PSI																	
Steam Flow	#/HR																	
Steam Temp	°F																	
NOX	PPM																	
Blow Down Conductivity	MHOS																	
OH LINE TURBINE WATER WASH	Y/N																	
CONDUCTIVITY MHOS	Y/N																	
BOILER FEED WATER PUMP OPERATION	NO																	
NO. 2	Y/N																	

# OFFICIAL DAILY COGENERATION LOG

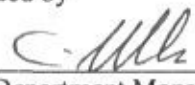

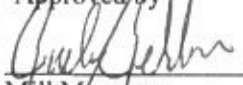
NOTES: NEW DEMO TRAILER  
 M - 57272700  
 C - 77317302  
 COGEN TRIP U-04 AN  
 10:10 9:10 AUTO 9:18 UL  
 11:07 6:00 7:28

NIGHT SHIFT OPERATOR

DRY SHIFT OPERATOR

## Hueneme Mill Environmental Incident Report

Shaded section to be completed by the EMR

Name of Incident <b>PI emission data loss due to power outage</b>		Incident Date <b>12/11/13</b>	
Exact Location Incident <b>Cogen</b>			
Reported By <b>R Lebrilla</b>	Estimated Start and Stop Times of Incident: <b>6:06 AM - 7:15 AM &amp; 8:00 AM - 8:10 AM</b>		Possible Cause: <b>mill power outage</b>
Incident Type: <input type="checkbox"/> Spill Internal <input checked="" type="checkbox"/> Spill External <input checked="" type="checkbox"/> Air Emission <input type="checkbox"/> Other _____	<input type="checkbox"/> Improper Waste Disposal <input type="checkbox"/> Near miss or below spill release guidelines	Released To <input type="checkbox"/> Storm Water System <input type="checkbox"/> Process Sewer <input type="checkbox"/> Ground (External) <input type="checkbox"/> Near Miss <input type="checkbox"/> Other _____	
<input type="checkbox"/> Secondary Containment <input checked="" type="checkbox"/> X Air <input type="checkbox"/> Ground (Inside Mill Property)			
Detailed Description of Event  Mill power outage on 12/11/13 at about 6:06 AM resulted to losing network connections including DCS and PI interface. Mill lost PI emission data from 6:06 AM - 7:15 AM and from 8:00 AM - 8:10 AM. Cogen was down from 6:06 AM - 9:07 AM on 12/11/13.  <i>(if required use additional paper and attach)</i>			
Estimated Amount Released		pH	CONSISTENCY (%)
<input type="checkbox"/> _____ Gallons <input type="checkbox"/> _____ Pounds <input type="checkbox"/> Other _____			
List Any External Emergency Clean Up Personnel Contacted <b>N/A</b>		List Any External Agencies Contacted (Agency, person and time of call.) <b>APCD @ 8:50 AM by R Lebrilla</b>	
List Hueneme Personnel Contacted (Foreman, Mill Manager, etc.) <b>Charlie Wilson, Lars Gustavson, Rudy Rehbein</b>		Any Acute or Chronic Health Risks (refer to MSDS) <b>N/A</b>	
Describe Any Emergency Response Actions: <b>Investigated cause of outage. Potential low voltage.</b>			
Suggestions to Prevent Reoccurrence			Estimated Completion Date
1.			1.
2.			2.
3.			3.
4.			4.
Root Cause after investigation		Severity Level (level 1 and 2 must be tracked through SHIMS) <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4	
Investigated By: <b>Lars Gustavson/Charlie Wilson</b>		Investigated Date <b>12/11/13</b>	
Follow Up		By When	Completion Date
Issued by  Department Manager	Reviewed by  Technical Superintendent <b>12/12/2013</b>	Approved by  Mill Manager <b>12/13/2013</b>	

**12/12/13**

**Print Time: 12/12/2013 10:27:30 AM**

**Note: This document is valid for only ONE week after print time!**



**NEW**  **INDY**  
**CONTAINERBOARD**

January 13, 2014

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

Subject: Low Inlet NOx Emissions

Dear Mr. Olson:

This letter is a follow up on the call I made to the VCAPCD Breakdown Center Hotline on January 8, 2014 at about 2:30 PM.

During CEMS inspection on January 8, 2014 at 12:40 PM, it was observed that the air flow for inlet NOx sample was below the normal range. All other emission parameters were at normal level and stable. Troubleshooting was immediately initiated. A loose fitting connection at the pressure side of the inlet NOx sample line was discovered. After replacing the fitting, the inlet NOx emission reverted to expected level. The inlet NOx emission data were low from 12:40 PM to 3:10 PM, a total of 2.5 hours. A passing calibration was completed at about 3:30 PM.

The Daily Emission Sheets, PI trends, DCS trends, Cogen Reports and Environmental Incident Report have been provided for your review. If you have any questions or require any additional information, please call me at (805) 271-7284.

Sincerely,



Robyn Lebrilla  
Environmental Engineer

---

**NEW INDY OXNARD, LLC**

5936 PERKINS ROAD • OXNARD, CALIFORNIA 93033 • WWW.NEWINDYCONTAINERBOARD.COM  
PHONE (805) 986-3881 • FAX (805) 488-5186



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

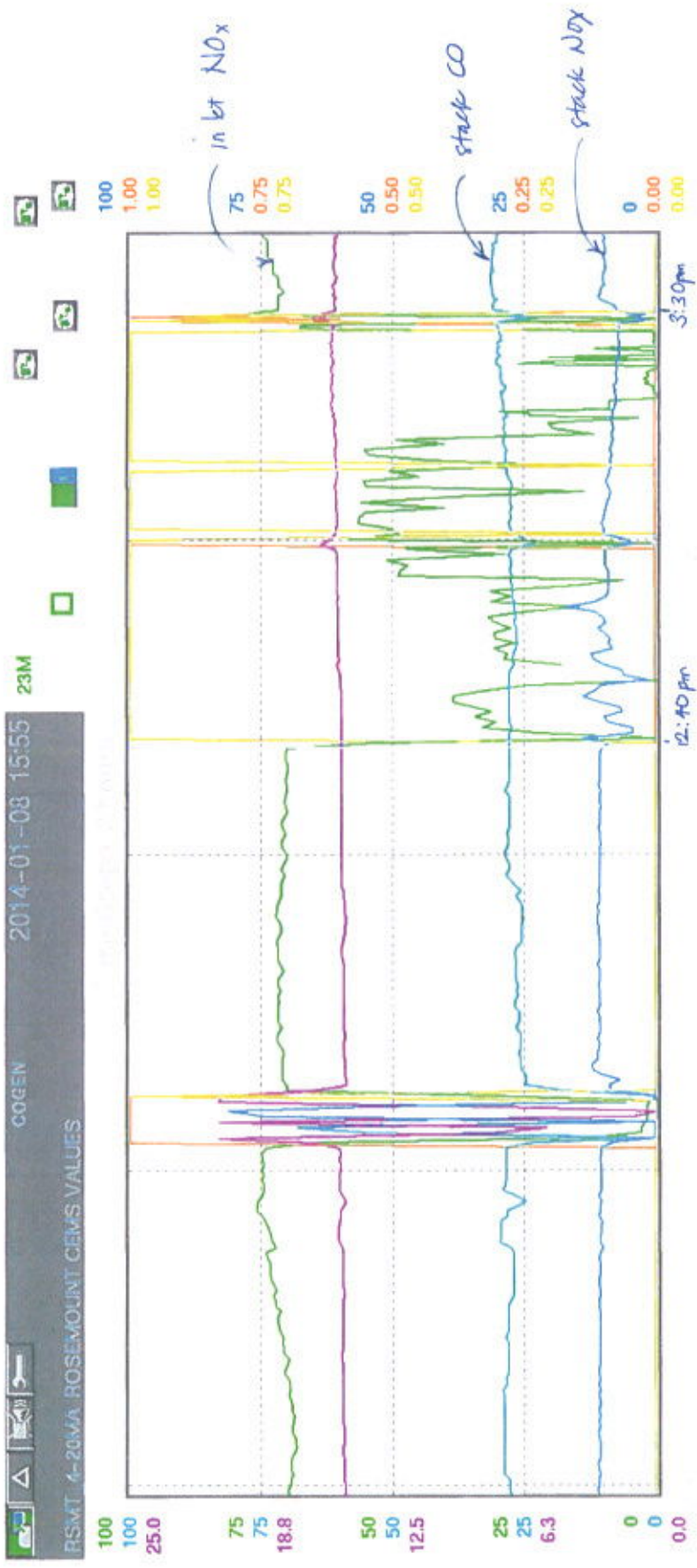
### Certification by Responsible Official

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

<p>Signature and Title of Responsible Official:</p> <p>Signature: <u>Gudy Gubler</u></p> <p>Title: <u>Mill Manager</u></p>	<p>Date:</p> <p>1/13/2014</p>
--	-------------------------------







SOI Desc	Device Unit	Sample	Frequency	Response	Unit	Alarm	Filter	Group/Filter	Form
931AIC1111A NOX	931AIC1111A	NOX	100%	100%	ppm	100%	100%	100%	100%
931AIC1111B CO	931AIC1111B	CO	100%	100%	ppm	100%	100%	100%	100%
931AIC1111C O2	931AIC1111C	O2	100%	100%	%	100%	100%	100%	100%
931AIC1111D NOX	931AIC1111D	NOX	100%	100%	ppm	100%	100%	100%	100%
931-AIC-1111HCAL	931-AIC-1111H	HCAL	100%	100%	ppm	100%	100%	100%	100%
931-nc-1111trb	931-nc-1111trb	trb	100%	100%	ppm	100%	100%	100%	100%

D1 30 minutes D2 1 hour D3 1 day D4 10 days

D6 Positioning... D7 Trace Config... D8 Analyze... D9 Trace Config... D10 Extended Config...



L. PUMPS		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA	
Flow Rate	Level	PERMATE H2O	CONCENTRATED H2O	UP	HP	SGC LP	TURBINE	ELECTRIC READING	MAXION	BURNER	HEBRASKA	U	IS						
Shear 18 m/min		1317112	01313024	74243860	189914	1613	3500450	5831550	648536	0		29	113						
Coastal 5.3 m/min		13084654	01219624	74222611	140462	1503	3500800	5522600	64852	0		29	113						
Player 6.8 m/min																			
Coastal (as needed)																			

STEAM & WATER READINGS		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA	
PERMATE H2O	CONCENTRATED H2O	UP	HP	SGC LP	TURBINE	ELECTRIC READING	MAXION	BURNER	HEBRASKA	U	IS								
7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00	5:00									
41.19	41.18	40.62	40.77	40.31	40.5	40.8	40	41	41	40									
60	54	62	64	58	58	55	53	52	50	50									
55.0	51.9	52.1	50.6	51.0	51.9	51.4	51.4	51.4	51.4	51.4									
12	12	12	12	12	12	12	12	12	12	12									
2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00									
95	95	95	95	95	95	95	95	95	95	95									
1358	1350	1352	1352	1352	1352	1377	1365	1360	1350	1350									

TURBINE		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA	
WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	
7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00	5:00									
146	145	150	152	152	151	150	150	149	147	144									
126	126	124	124	124	123	121	123	121	119	116									
32	34	32	32	32	32	32	32	32	32	32									
9.97	10.1	10.1	10.1	9.88	9.9	10	10	10	10.1	9.9									

GENERATOR		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA	
WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	
7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00	5:00									
146	145	150	152	152	151	150	150	149	147	144									
126	126	124	124	124	123	121	123	121	119	116									
32	34	32	32	32	32	32	32	32	32	32									
9.97	10.1	10.1	10.1	9.88	9.9	10	10	10	10.1	9.9									

COOLIN BOILER		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA	
WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	
7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00	5:00									
711	707	710	705	712	709	710	710	704	709	710									
473	480	480	480	480	473	480	473	473	475	470									
145	147	146	146	146	146	146	147	152	152	152									
10.2	10.4	10.2	9.3	7.2	10.1	10.3	10	10.2	10	10.1									
14.77	14.7	14.8	15.16	15.35	15.1	15.1	15.2	15.2	15.3	15									

COMPRESSORS		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA	
WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	
7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00	5:00									
229	233	237	237	237	235	235	237	235	235	235									
420	425	425	425	425	425	425	425	425	425	425									

NEBRASKA BOILER		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA		NEBRASKA	
WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	WATER	
7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00	5:00									
229	233	237	237	237	235	235	237	235	235	235									
420	425	425	425	425	425	425	425	425	425	425									

DRY SHIFT OPERATOR

NAME: \_\_\_\_\_

TIME: \_\_\_\_\_

# OFFICIAL DAILY COGENERATION LOG


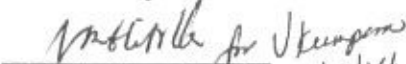

DATE: 11/8/14

WOL 1020

NOTES: WITH DRG FROM #2 #1 8:02 AM  
GAS COMP. FROM 420 PSI TO 425 PSI 7:50 AM

## Hueneme Mill Environmental Incident Report

Shaded section to be completed by the EMR

Name of Incident <b>Inlet NOx low sample gas flow</b>		Incident Date <b>1/8/2014</b>	
Exact Location Incident <b>Cogen</b>			
Reported By <b>R Lebrilla</b>	Estimated Start and Stop Times of Incident: <b>12:40 PM to 3:30 PM</b>		Possible Cause: <b>Leak in sample</b>
Incident Type: <input type="checkbox"/> Spill Internal <input type="checkbox"/> Disposal <input checked="" type="checkbox"/> Spill External <input checked="" type="checkbox"/> Air Emission <input type="checkbox"/> Other _____	<input type="checkbox"/> Improper Waste <input type="checkbox"/> Near miss or below spill release guidelines	Released To <input type="checkbox"/> Storm Water System <input type="checkbox"/> Process Sewer <input type="checkbox"/> Ground (External) <input type="checkbox"/> Near Miss <input type="checkbox"/> Other _____	
<input type="checkbox"/> Secondary Containment <input checked="" type="checkbox"/> Air <input type="checkbox"/> Ground (Inside Mill Property)			
Detailed Description of Event  During daily inspection the air flow for inlet NOx sample was below normal range, automatic daily calibration was good and unit was reading proper inlet NOx values. Troubleshooting of cause was initiated. During troubleshooting flows were interrupted therefore breakdown call was made to APCD. Stack measurements were not affected, only inlet. Cause of low flow was a leaky fitting on pressure side, the fitting was replaced. Flows are back to normal and unit passed calibrated at 3:30 PM.			
<i>(if required use additional paper and attach)</i>			
Estimated Amount Released		pH	CONSISTENCY (%)
<input type="checkbox"/> _____ Gallons <input type="checkbox"/> _____ Pounds <input type="checkbox"/> Other _____			Estimated Monetary Loss
List Any External Emergency Clean Up Personnel Contacted N/A		List Any External Agencies Contacted (Agency, person and time of call.) APCD @ 2:300 PM by R Lebrilla	
List Hueneme Personnel Contacted (Foreman, Mill Manager, etc.) Charlie Wilson, Lars Gustavson, Robyn Lebrilla		Any Acute or Chronic Health Risks (refer to MSDS)N/A	
Describe Any Emergency Response Actions			
Suggestions to Prevent Reoccurrence			Estimated Completion Date
1. Replace leaky fitting and leak check all other lines for sample handling. Completed on 1/8/2014.			1. 1/8/2014
2.			2
3.			3.
Root Cause after investigation		Severity Level (level 1 and 2 must be tracked through SHIMS)	
		<input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4	
Investigated By: <b>Lars Gustavson/Charlie Wilson</b>		Investigated Date <b>12/11/13</b>	
Follow Up		By When	Completion Date
Issued by  Department Manager	Reviewed by  Technical Superintendent 1/13/14	Approved by  Mill Manager 1/13/2014	

Print Time: 1/13/2014 8:28:45 AM

**Note: This document is valid for only ONE week after print time!**

# NEW INDY

CONTAINERBOARD

February 19, 2014

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

Subject: Fuel data loss

Dear Mr. Olson:

This letter is a follow up on the call made by Steve Chuhaloff to the VCAPCD Breakdown Center Hotline on February 17, 2014 at about 3:10 PM.

On February 17, 2014, there was a momentary data communication loss between Mark V turbine control system and the distributed control system (DCS). DCS showed a modbus data collection failure alarm, which includes the turbine fuel data, from 2:53 PM to 3:00 PM. Investigation showed that the voltage drop in the mill was due to SCE power issue. There was insignificant impact on PI data as reflected on the daily emission sheet since the data communication loss happened for 7 minutes only.

The Daily Emission Sheets, PI trends, DCS trends, Cogen Reports and Environmental Incident Report have been provided for your review. If you have any questions or require any additional information, please call me at (805) 271-7284.

Sincerely,



Robyn Lebrilla  
Environmental Engineer

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**NEW INDY OXNARD, LLC**

5936 PERKINS ROAD • OXNARD, CALIFORNIA 93033 • WWW.NEWINDYCONTAINERBOARD.COM  
PHONE (805) 985-2991 • FAX (805) 985-5102





Ventura County  
Air Pollution  
Control District

## RESPONSIBLE OFFICIAL'S CERTIFICATION FORM

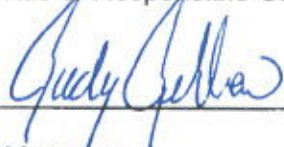
Ventura County APCD Rule 33.9 requires that "any document, including reports, schedule of compliance progress reports and compliance certifications, required by a Part 70 permit shall be certified by a responsible official." Therefore, this form shall be signed by the company's Responsible Official and 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.

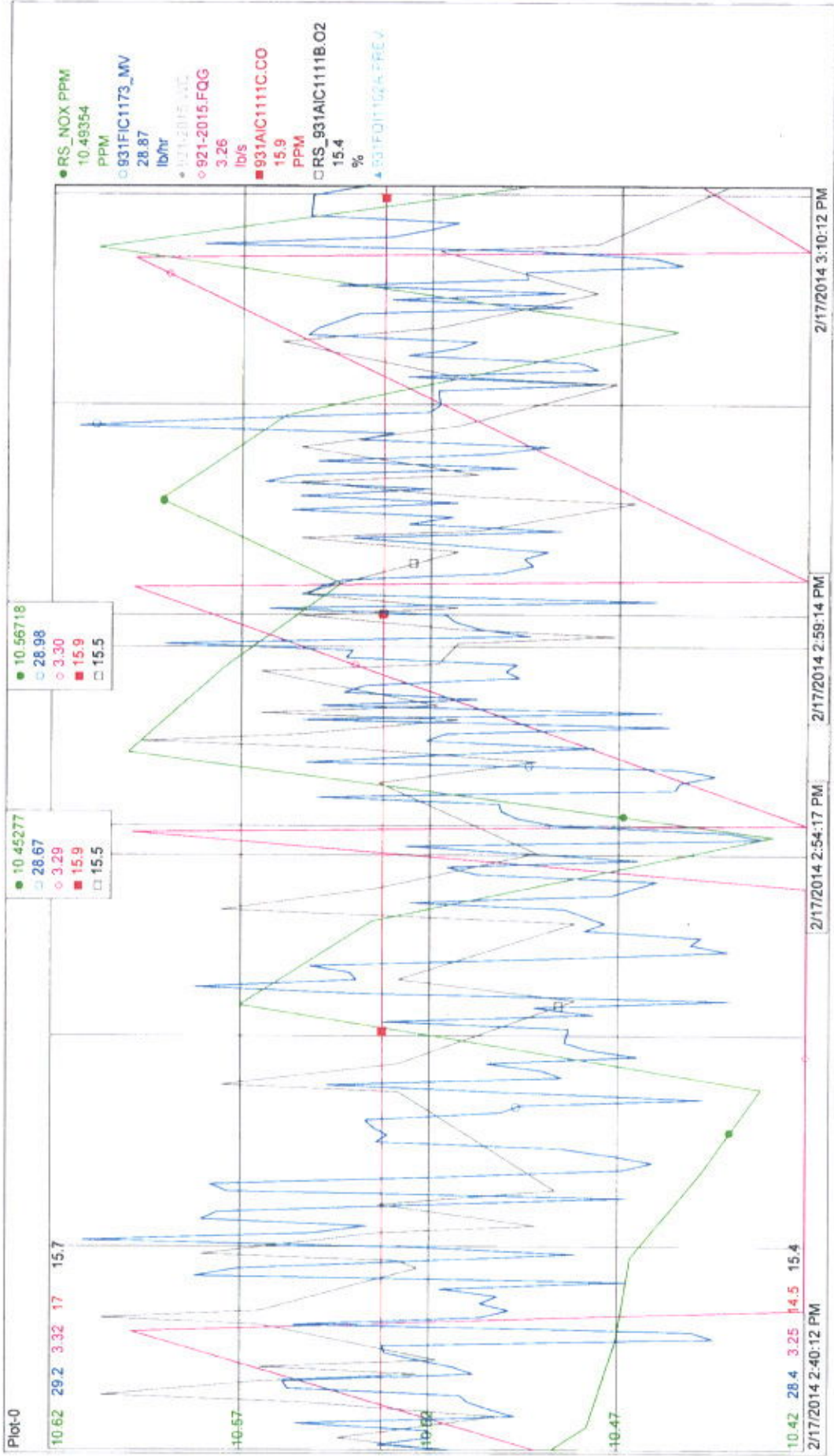
<p>Signature and Title of Responsible Official:</p> <p>Signature: <u></u></p> <p>Title: <u>Mill Manager</u></p>	<p>Date:</p> <p><u>2/20/2014</u></p>
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**DAILY ENVIRONMENTAL REPORT**

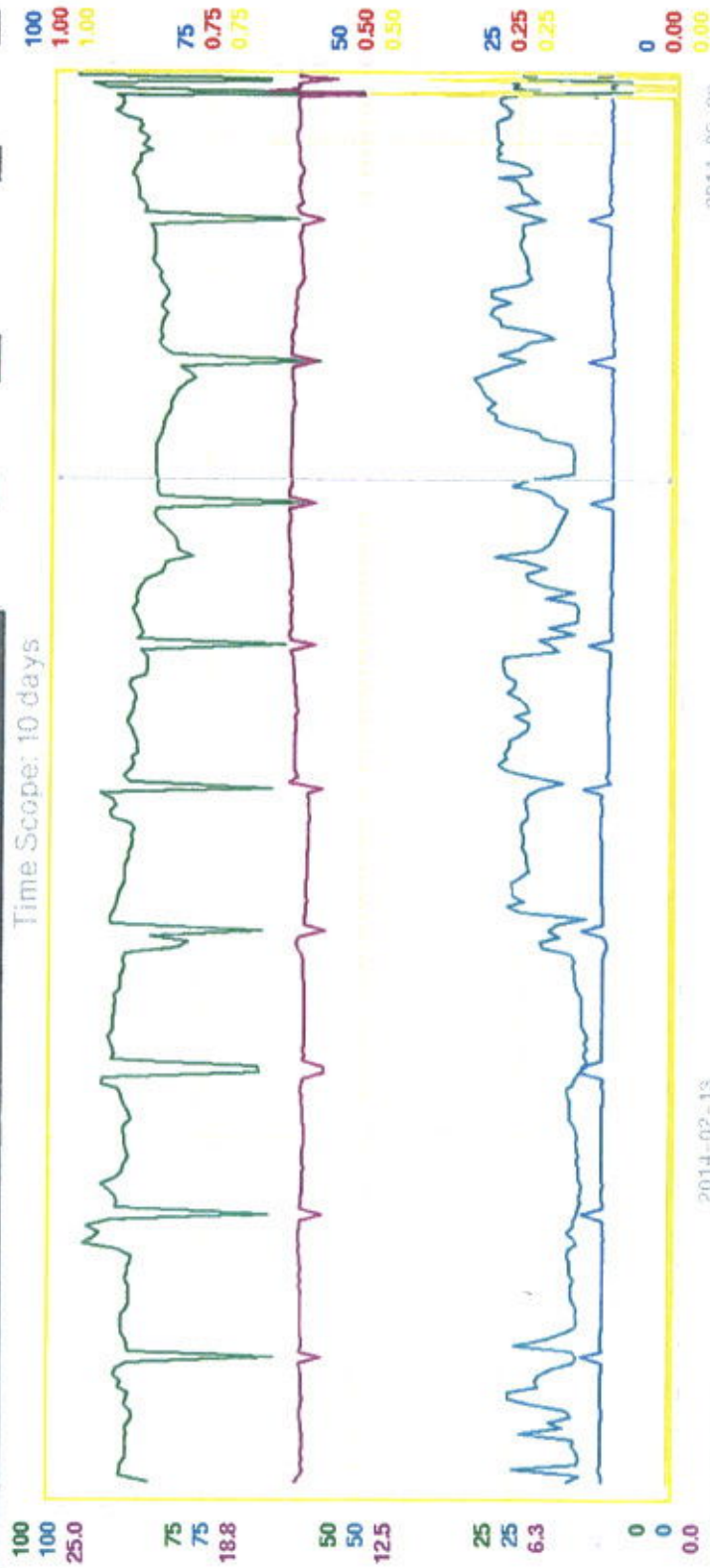
Start Time: 2/18/2014 7:00 End Time: 2/17/2014 7:00

Time	Duct burner gas flow MGD/PH	Turbine gas flow MGD/PH	SCR Temperature °F	SCR NOx ppm	Ammonia Usage lb/h	NH3 NOx ppm	Injection stream lb/h	Steam to fuel ratio lb/h	NOx lb/h	Stack O2 %	Stack CO ppm	Stack SO2 lb/h	CD lb/h	Stack NOx ppm	2h Average NOx	Nebraska NOx %	Nebraska Connected NOx (3% O2)	Daily Air Copem lb/h	Daily Air Copem/NOx lb/h
8:00	2.21	261.23	608.22	83.56	28.49	0.96	2.22	0.70	10.14	15.55	19.74	11.57	10.50	10.50	25.43	1.45		10.40	10.40
9:00	2.21	261.40	608.58	83.96	28.58	0.95	2.24	0.70	10.12	15.55	19.18	11.23	10.48	10.51	25.40	1.67			
10:00	2.21	261.73	608.69	83.65	28.63	0.95	2.25	0.70	10.17	15.55	18.80	11.03	10.51	10.50	25.38	1.61			
11:00	3.69	261.58	612.86	83.30	27.41	0.82	2.25	0.70	10.32	15.52	27.26	16.38	10.43	10.43	25.38	1.55			
12:00	3.91	262.10	612.72	83.06	26.24	0.95	2.25	0.70	10.23	15.57	21.96	13.91	10.50	10.53	25.38	1.56			
13:00	4.74	266.01	614.43	83.76	28.43	0.93	2.28	0.71	10.44	15.56	23.66	14.38	10.50	10.55	25.45	1.26			
14:00	6.20	266.52	617.00	83.53	27.66	0.90	2.32	0.72	10.50	15.48	28.05	17.18	10.48	10.49	25.50	0.97			
15:00	4.86	267.06	618.01	83.50	28.28	0.91	2.35	0.72	10.54	15.50	24.56	15.91	10.54	10.54	25.54	0.53			
16:00	2.19	266.48	614.40	83.91	28.92	0.95	2.35	0.72	10.34	15.50	17.29	10.40	10.49	10.50	25.51	0.50			
17:00	2.19	266.35	613.26	83.91	28.90	0.95	2.33	0.72	10.33	15.52	17.44	10.43	10.49	10.51	25.48	0.50			
18:00	2.19	266.35	612.05	83.85	28.78	0.94	2.31	0.71	10.30	15.54	17.50	10.50	10.46	10.48	25.40	0.84			
19:00	2.19	266.35	611.87	83.91	28.96	0.95	2.30	0.71	10.36	15.51	17.34	10.48	10.53	10.49	25.41	1.04			
20:00	2.19	264.58	611.89	83.91	29.13	0.95	2.28	0.71	10.25	15.51	17.45	10.48	10.47	10.49	25.40	1.08			
21:00	2.19	266.01	611.92	83.89	29.14	0.96	2.30	0.71	10.29	15.49	17.95	10.74	10.47	10.49	25.38	1.86			
22:00	4.18	265.86	613.70	83.15	26.57	0.94	2.29	0.71	10.40	15.44	23.04	13.60	10.51	10.48	25.44	1.40			
23:00	4.30	265.86	613.15	82.70	26.30	0.94	2.29	0.71	10.39	15.47	23.87	14.47	10.49	10.49	25.44	1.37			
0:00	6.75	265.06	614.80	82.74	27.93	0.92	2.29	0.71	10.59	15.45	29.13	17.68	10.50	10.50	25.53	1.53			
1:00	7.69	264.31	616.35	82.38	27.61	0.91	2.27	0.71	10.49	15.46	31.05	18.98	10.49	10.50	25.49	1.61			
2:00	7.70	264.67	616.20	81.62	27.30	0.90	2.27	0.71	10.52	15.48	31.00	18.90	10.51	10.50	25.54	1.41			
3:00	7.70	266.01	616.23	81.41	27.17	0.90	2.29	0.71	10.54	15.42	32.41	19.82	10.48	10.49	25.51	1.56			
4:00	9.25	266.18	619.02	81.36	27.16	0.89	2.30	0.71	10.81	15.36	30.81	18.80	10.48	10.49	25.48	1.75			
5:00	7.95	266.18	617.61	80.83	27.10	0.90	2.31	0.71	10.85	15.41	32.39	19.86	10.53	10.50	25.48	1.39			
6:00	7.76	266.18	615.88	80.14	26.67	0.90	2.31	0.71	10.56	15.44	33.37	20.46	10.50	10.50	25.48	1.12			
7:00	8.78	268.25	618.78	79.06	26.15	0.88	2.36	0.72	10.72	15.42	33.67	20.80	10.53	10.52	25.48	1.06			

Comment:



node 20 2014-02-20 13:53 26ME  
 782-GRP ALM SEC FIBER GRP ALM Disturb. 13:51:12  
 RSMT\_4-20MA ROSEMOUNT CEMS VALUES



ON Name	Description	Attribute	Treatment	Ruler Time	Ruler Value	Current Value	Unit	Filter	Time Offset	Form
931AIC1111A:NOX	B&W SGR INLET NOX	MV	Mom	15:00 2014-02-17	83.46	87.03	PPM			
931AIC1111C:CO	B&W BLR STACK RAW CO	MV	Mom	15:00 2014-02-17	23.12	24.44	PPM			
931AIC1111B:O2	B&W BLR RAW O2%	MV	Mean	15:00 2014-02-17	15.46	15.20	%			
931AIC1111D:NOX	B&W BLR STACK NOX	MV	Mean	15:00 2014-02-17	9.05	10.15	PPM			
931-AIC-1111.INCAL	RSMT CEMS IN GAL	MV	Mom	15:00 2014-02-17	0	0				
931-aic-1111.trb	RSMT CEMS TROUBLE	MV	Mom	15:00 2014-02-17	0	0				

2014-02-20

2014-02-13

D1 30 minutes D2 1 hour D3 8 hours D4 1 day D5 10 days

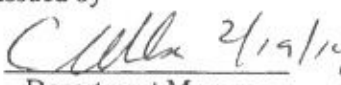
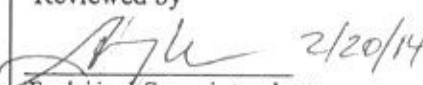
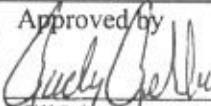
D6 Positioning... D7 Trace Control... D8 Analyze... D9 Trace Config... D10 Extended Config...

ABB



## Hueneme Mill Environmental Incident Report

Shaded section to be completed by the EMR

Name of Incident Modbus data communication failure		Incident Date February 17, 2014	
Exact Location Incident: Cogen			
Reported By Steve Chuhaloff		Estimated Start and Stop Times of Incident: 02/17/2014 14:53 to 02/17/2014 15:00	Root Cause: under investigation
Incident Type: <input type="checkbox"/> Spill Internal <input type="checkbox"/> Improper Waste Disposal <input type="checkbox"/> Spill External <input type="checkbox"/> Near miss or below spill release guidelines <input checked="" type="checkbox"/> Air Emission <input type="checkbox"/> Other _____		Released To <input type="checkbox"/> Storm Water System <input type="checkbox"/> Secondary Containment <input type="checkbox"/> Process Sewer <input type="checkbox"/> Air <input type="checkbox"/> Ground (External) <input type="checkbox"/> Ground (Inside Mill Property) <input checked="" type="checkbox"/> Near Miss <input type="checkbox"/> Other _____	
Detailed Description of Event At 3:05 p.m. on Feb. 17, 2014, Todd Royer paged me to let me know that we had a "mod buss failure " in cogen. I proceeded to call APCD, left a message as to the nature of the call, and then emailed the people for the mill that I thought should know. The duration of the incident was 7 minutes. (if required use additional paper and attach)			
Estimated Amount Released <input type="checkbox"/> _____ Gallons <input type="checkbox"/> _____ Pounds <input type="checkbox"/> Other _____		pH	CONSISTENCY (%)
Estimated Monetary Loss			
List Any External Emergency Clean Up Personnel Contacted N/A		List Any External Agencies Contacted (Agency, person and time of call.) . APCD left phone message as per recording.	
List Hueneme Personnel Contacted Rudy Rehbein, Charlie Wilson, Jim Grimme, Robyn Lebrilla, Victor Kumpera		Any Acute or Chronic Health Risks (refer to MSDS) N/A	
Describe Any Emergency Response Actions:			
Suggestions to Prevent Reoccurrence			Estimated Completion Date
1. N/A – outside mill control			1.
2.			2.
Root Cause after investigation Investigation showed that the voltage drop in the mill was due to SCE power issue. On 2/17 at 14:51, a vehicle damaged a pole causing cross arm to break and conductors to wrap together.		Severity Level (level 1 and 2 must be tracked through SHIMS) <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4	
Investigated By Jim Grimme		Investigated Date 2/18/14	
Follow Up N/A		By When	Completion Date
			By Whom
Issued by  Department Manager	Reviewed by  Technical Superintendent	Approved by  Mill Manager 2/20/2014	

Print Time: 2/19/2014 12:26:05 PM

Note: This document is valid for only ONE week after print time!

**NEW WINDY**  
**CONTAINERBOARD**

March 5, 2014

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

Subject: Fuel data loss

Dear Mr. Olson:

This letter is a follow up on the call made by Howard Gastelum to the VCAPCD Breakdown Center Hotline on February 27, 2014 at about 3:00 AM.

On February 27, 2014, there was a momentary data communication loss between Mark V turbine control system and the distributed control system (DCS). DCS showed a modbus data collection failure alarm, which includes the turbine fuel data, at about 1:20 AM. This incident was a modbus system-related issue. The mill is exploring on upgrading the system. There was insignificant impact on PI data as reflected on the daily emission sheet due to the short duration of data communication loss (less than 15 minutes).

The Daily Emission Sheets, PI trends, Cogen Reports and Environmental Incident Report have been provided for your review. If you have any questions or require any additional information, please call me at (805) 271-7284.

Sincerely,

  
Robyn Lebrilla  
Environmental Engineer

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**NEW INDY OXNARD, LLC**

5936 PERKINS ROAD • OXNARD, CALIFORNIA 93033 • WWW.NEWINDYCONTAINERBOARD.COM  
PHONE (805) 986-3881 • FAX (805) 488-5186



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.

<p>Signature and Title of Responsible Official:</p> <p>Signature: <u>Gudy Gelber</u></p> <p>Title: <u>Milk Manager</u></p>	<p>Date:</p> <p><u>3/5/2014</u></p>
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**DAILY ENVIRONMENTAL REPORT**

2/27/2014 7:00

2/26/2014 7:00

Time	Duct burner gas flow SSECF4	Inlet gas flow SSECF4	Inlet Temperature °C	SCR Temperature °C	SCR NOx ppm	NOx ppm	NH3 ppm	Injection stream lb/h	Steam to fuel lb/h	NOx lb/h	Stack NOx ppm	Stack CO ppm	Stack CO %	Stack SO2 ppm	Stack SO2 %	Nebraska NOx %	Nebraska CO %	31 Average NOx	31 Average CO	Daily Air Cogen lb/h	Daily Air Cogen lb/h	Daily Air Cogen lb/h	Daily Air Cogen lb/h
8:00	0.02	269.52	612.35	612.35	71.15	29.72	1.14	2.33	0.72	10.32	15.52	17.21	10.23	10.48	25.29	2.85	10.03	10.03	10.03	10.03	10.03	10.03	10.03
9:00	0.02	267.54	612.31	612.31	69.91	28.81	1.13	2.36	0.72	10.40	15.50	17.97	10.85	10.48	25.22	2.53	10.03	10.03	10.03	10.03	10.03	10.03	10.03
10:00	1.43	269.27	613.49	613.49	69.70	28.89	1.13	2.39	0.73	10.49	15.51	21.82	12.87	10.51	25.25	2.05	10.03	10.03	10.03	10.03	10.03	10.03	10.03
11:00	1.81	267.35	614.47	614.47	71.43	29.79	1.15	2.35	0.72	9.84	15.59	17.70	10.61	10.31	25.28	2.06	10.03	10.03	10.03	10.03	10.03	10.03	10.03
12:00	0.05	266.52	614.45	614.45	72.39	30.65	1.16	2.34	0.72	10.34	15.64	17.45	10.55	10.44	25.32	1.35	10.03	10.03	10.03	10.03	10.03	10.03	10.03
13:00	0.05	266.35	614.52	614.52	72.41	30.71	1.16	2.34	0.72	10.33	15.59	17.40	10.41	10.49	25.34	1.21	10.03	10.03	10.03	10.03	10.03	10.03	10.03
14:00	0.05	268.69	614.63	614.63	71.53	30.45	1.13	2.35	0.72	10.33	15.59	17.21	10.39	10.48	25.36	1.29	10.03	10.03	10.03	10.03	10.03	10.03	10.03
15:00	2.48	271.53	610.50	610.50	65.78	26.71	1.13	2.16	0.70	9.72	15.63	24.42	13.77	10.30	25.31	1.43	10.03	10.03	10.03	10.03	10.03	10.03	10.03
16:00	3.51	270.46	602.73	602.73	58.84	22.33	1.16	1.98	0.69	9.29	15.77	30.61	16.48	10.43	25.30	1.71	10.03	10.03	10.03	10.03	10.03	10.03	10.03
17:00	5.96	270.48	604.80	604.80	59.24	22.71	1.16	1.98	0.69	9.44	15.72	33.06	18.16	10.57	25.32	1.78	10.03	10.03	10.03	10.03	10.03	10.03	10.03
18:00	3.95	276.63	605.08	605.08	59.03	22.63	1.16	1.98	0.69	9.49	15.72	33.13	18.06	10.50	25.32	1.87	10.03	10.03	10.03	10.03	10.03	10.03	10.03
19:00	5.98	278.02	608.86	608.86	58.85	22.51	1.14	2.01	0.69	9.43	15.73	33.54	18.43	10.46	25.32	2.20	10.03	10.03	10.03	10.03	10.03	10.03	10.03
20:00	5.45	277.05	608.87	608.87	58.37	22.03	1.15	1.98	0.69	9.46	15.69	33.43	17.70	10.53	25.26	2.85	10.03	10.03	10.03	10.03	10.03	10.03	10.03
21:00	6.06	276.14	607.95	607.95	58.20	22.05	1.13	1.98	0.69	9.38	15.66	33.42	18.35	10.47	25.27	2.74	10.03	10.03	10.03	10.03	10.03	10.03	10.03
22:00	5.11	254.87	614.27	614.27	66.34	20.64	1.17	2.20	0.71	10.26	15.51	29.04	18.88	10.68	25.24	3.38	10.03	10.03	10.03	10.03	10.03	10.03	10.03
23:00	0.12	269.35	615.83	615.83	73.66	30.53	1.14	2.31	0.71	10.32	15.56	19.53	9.91	10.47	25.25	3.50	10.03	10.03	10.03	10.03	10.03	10.03	10.03
0:00	0.18	266.01	615.89	615.89	74.35	31.01	1.15	2.32	0.72	10.31	15.58	19.71	9.93	10.47	25.23	3.60	10.03	10.03	10.03	10.03	10.03	10.03	10.03
1:00	2.22	266.35	619.48	619.48	74.56	31.06	1.14	2.32	0.72	10.45	15.48	19.91	12.18	10.53	25.30	3.76	10.03	10.03	10.03	10.03	10.03	10.03	10.03
2:00	0.05	266.35	617.35	617.35	76.43	32.08	1.16	2.34	0.72	10.37	15.39	19.08	9.09	10.53	25.20	3.85	10.03	10.03	10.03	10.03	10.03	10.03	10.03
3:00	4.69	273.57	609.98	609.98	59.70	22.73	1.21	2.02	0.71	9.56	15.62	31.77	16.82	10.59	25.34	3.71	10.03	10.03	10.03	10.03	10.03	10.03	10.03
4:00	5.35	266.35	623.54	623.54	74.34	31.32	1.13	2.34	0.72	10.67	15.28	25.08	15.37	10.51	25.27	3.65	10.03	10.03	10.03	10.03	10.03	10.03	10.03
5:00	0.14	266.35	617.55	617.55	75.87	31.63	1.14	2.31	0.72	10.36	15.35	19.15	9.73	10.51	25.08	3.51	10.03	10.03	10.03	10.03	10.03	10.03	10.03
6:00	0.03	266.86	616.19	616.19	75.91	31.11	1.14	2.35	0.72	10.36	15.35	19.99	9.62	10.51	25.04	3.57	10.03	10.03	10.03	10.03	10.03	10.03	10.03
7:00	0.03	268.86	616.18	616.18	73.96	30.62	1.12	2.37	0.72	10.39	15.41	16.21	9.69	10.46	25.05	3.51	10.03	10.03	10.03	10.03	10.03	10.03	10.03

**Comment:**

Stack CO Analyzer

Zero value: 0.05

Zero drift: -0.06

Span value: 90.34

Span drift: 0.09

Stack O2 Analyzer

Zero value: 21.05

Zero drift: 0.64

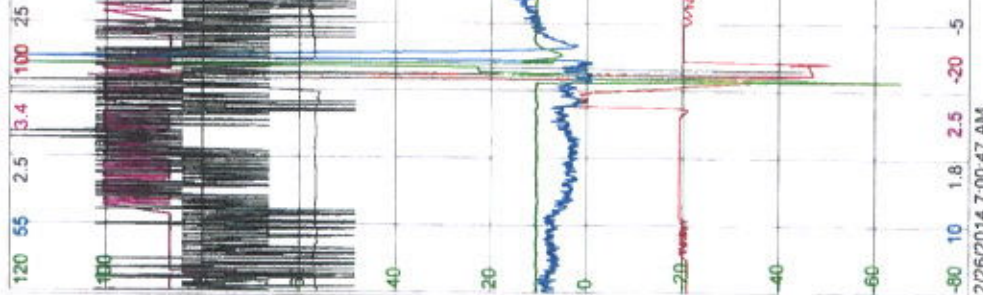
Span value: -0.05

Span drift: -0.19

Nebraska Gas

0

Plot-0



10.40187  
31.97  
2.38  
3.25  
14.3  
15.4

● RS\_NOX\_PPM 10.55498  
○ 931FIC1173\_MV 30.61  
◆ 921-2015.WQ 2.40  
○ 921-2015.FQG 3.31  
■ 931AIC1111C.CO 15.1  
□ RS\_931AIC1111B.O2 15.4  
▲ 931FIC1102A.PREV

2/26/2014 7:00:47 AM 2/27/2014 1:22:00 AM 2/27/2014 7:00:47 AM



ON/Name	Description	Attribute	Treatment	Ruler Time	Ruler Value	Current Value	Unit	Filter	Time Offset	Form
931AIC1111A.NOX	B&W SCR INLET NOX	MV	Mom	01:00 2014-02-28	74.50	67.77	PPM			
931AIC1111C.CO	B&W BLR STACK RAW CO	MV	Mom	01:00 2014-02-28	14.62	25.54	PPM			
931AIC1111B.O2	B&W BLR RAW O2%	MV	Mean	01:00 2014-02-28	15.21	15.37	%			
931AIC1111D.NOX	B&W BLR STACK NOX	MV	Mean	01:00 2014-02-28	10.12	9.84	PPM			
931-AIC-1111.INCAL	RSMT CEMS IN CAL	MV	Mom	01:00 2014-02-28	0	0				
931-aic-1111.trb	RSMT CEMS TROUBLE	MV	Mom	01:00 2014-02-28	0	0				

D1 30 minutes	D2 1 hour	D3 8 hours	D4 1 day	D5 10 days
D6 Positioning...	D7 Trace Control...	D8 Analyze...	D9 Trace Config...	D10 Extended Config...



TICAL PUMPS		Level	RPM		PERMEATE H2O		CONCENTRATE H2O		LI		NEBRASKA		NEBRASKA ORDER TIME		FROM:		TO:		BOILER TEST RESULTS		NIGHT SHIFT		
de 3.9 ml/min	de 3.3 ml/min	de 6.8 ml/min	YES	NO	% FULL	15:00	17:00	19:00	21:00	23:00	HP	SEC LP	YES	NO	BOILER FEEDWATER	DAY SHIFT							
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	pH 8.75 - 9.5	8.81						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	Conductivity < 2000 ppm	6.95						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	Silica < 20 ppb	4						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	R.O.	600						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	Feed TDS < 1000 ppm	7.86						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	Permeate TDS < 10 ppm	5.95						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	on (feed 7.5)	9.22						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	CONDENSATE	10.5						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	HP-pH 8.5 - 9.5	9.53						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	Conductivity < 2000 ppm	14.72						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	LP-pH 8.5 - 9.5	9.53						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	Conductivity < 2000 ppm	14.72						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	HP	9.22						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	pH 9.5 - 10.5	6.85						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	Conductivity 75 - 150	8.91						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	Phosphate 5-15 ppm	1.03						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	Silica < 5 ppm	6.85						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	Iron ppm	1.03						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	MIXED BED	6.85						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	pH 6.0 - 7.5	6.85						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	Conductivity < 1000 ppm	1.03						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	Silica < 10 ppb	1.03						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	HP Steam Test	6.85						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	Silica < 20 ppb	1.03						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	SOFTNER	6.85						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	Hardness < 1.0 ppm	6.85						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	Running (1 or 2)	6.85						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	NEBRASKA	6.85						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	pH 9.5 - 10.5	6.85						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	Conductivity 75 - 200	6.85						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	Silica	6.85						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	Phosphate 5-25 ppm	6.85						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	STEAM TEST	6.85						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	Silica < 20 ppb	6.85						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	PV NO.2	6.85						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	Moysdale > 2000 ppm	6.85						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	NOTES: Lost Modbus Signal @ 1:20 A.M. HOWARD CALLED	6.85						
144	50	42	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1706	3844670	5:00	5:00	APED	6.85						

# OFFICIAL DAILY COGENERATION LOG

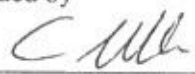

DRY SHIFT OPERATOR

NIGHT SHIFT OPERATOR

NAME: [Signature] DATE: [Signature]

# Hueneme Mill Environmental Incident Report

Shaded section to be completed by the EMR

Name of Incident: Modbus Data Loss		Incident Date: February 27, 2014		
Exact Location Incident: Cogen				
Reported By: Howard Gastelum		Estimated Start and Stop Times of Incident: 02/27/2014 1:20 AM	Root Cause: unknown	
Incident Type: <input type="checkbox"/> Spill Internal <input type="checkbox"/> Improper Waste Disposal <input type="checkbox"/> Spill External <input type="checkbox"/> Near miss or below spill release guidelines <input checked="" type="checkbox"/> Air Emission <input type="checkbox"/> Other _____		Released To: <input type="checkbox"/> Storm Water System <input type="checkbox"/> Secondary Containment <input type="checkbox"/> Process Sewer <input type="checkbox"/> Air <input type="checkbox"/> Ground (External) <input type="checkbox"/> Ground (Inside Mill Property) <input checked="" type="checkbox"/> Near Miss <input type="checkbox"/> Other _____		
Detailed Description of Event  DCS showed a modbus data collection failure alarm at about 1:20 AM. This includes turbine operating data (fuel data, etc). This incident was a modbus computer system-related issue. No SCE power-related incident.  (if required use additional paper and attach)				
Estimated Amount Released <input type="checkbox"/> _____ Gallons <input type="checkbox"/> _____ Pounds <input type="checkbox"/> Other _____		pH	CONSISTENCY (%)	Estimated Monetary Loss
List Any External Emergency Clean Up Personnel Contacted N/A		List Any External Agencies Contacted (Agency, person and time of call) . APCD		
List Hueneme Personnel Contacted Foreman		Any Acute or Chronic Health Risks (refer to MSDS) N/A		
Describe Any Emergency Response Actions:				
Suggestions to Prevent Reoccurrence			Estimated Completion Date	
1.			1.	
2.			2.	
Root Cause after investigation modbus computer system-related issue		Severity Level (level 1 and 2 must be tracked through SHIMS) <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4		
Investigated By		Investigated Date 2/28/14		
Follow Up		By When	Completion Date	By Whom
Issued by  Department Manager		Reviewed by _____ Technical Superintendent		Approved by  3/5/2014 Mill Manager

4/4/14

Print Time: 3/4/2014 5:14:25 PM

Note: This document is valid for only ONE week after print time!

# NEW INDY

## CONTAINERBOARD

March 10, 2014

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

Subject: PI data loss – fuel and steam injection data

Dear Mr. Olson:

This letter is a follow up on the call made by Charlie Wilson to the VCAPCD Breakdown Center Hotline on March 6, 2014 at about 11:42 PM.

During the cogen start-up on March 6, it was observed that the Modbus data was not updating at about 11:42 PM. PI lost fuel data and steam injection from March 6 at 10:52 PM to March 7 at 8:35 AM, a total of 9.72 hrs.

The mill had its annual maintenance outage from March 3 to March 6. During this outage, a new HMI (Human Machine Interface) system had been set up for cogen. This new HMI system allows for redundant back up of Modbus signals should primary Modbus connection fail. Since it was a new HMI system, some configuration settings needed to be amended. Contractor continued the verification process of the new system on March 7. No data was lost within the new HMI system. In addition, there was no excess emission during this incident.

The Daily Emission Sheets, PI trends, Cogen Reports and Environmental Incident Report have been provided for your review. If you have any questions or require any additional information, please call me at (805) 271-7284.

Sincerely,

  
Robyn Lebrilla  
Environmental Engineer

---

**NEW INDY OXNARD, LLC**

5936 PERKINS ROAD • OXNARD, CALIFORNIA 93033 • [WWW.NEWINDYCONTAINERBOARD.COM](http://WWW.NEWINDYCONTAINERBOARD.COM)  
PHONE (805) 986-3881 • FAX (805) 488-5186



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.

<p>Signature and Title of Responsible Official:</p> <p>Signature: <u>Gudy Gelber</u></p> <p>Title: <u>Mill Manager</u></p>	<p>Date:</p> <p><u>3/10/2014</u></p>
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### DAILY ENVIRONMENTAL REPORT

3/7/2014 7:00

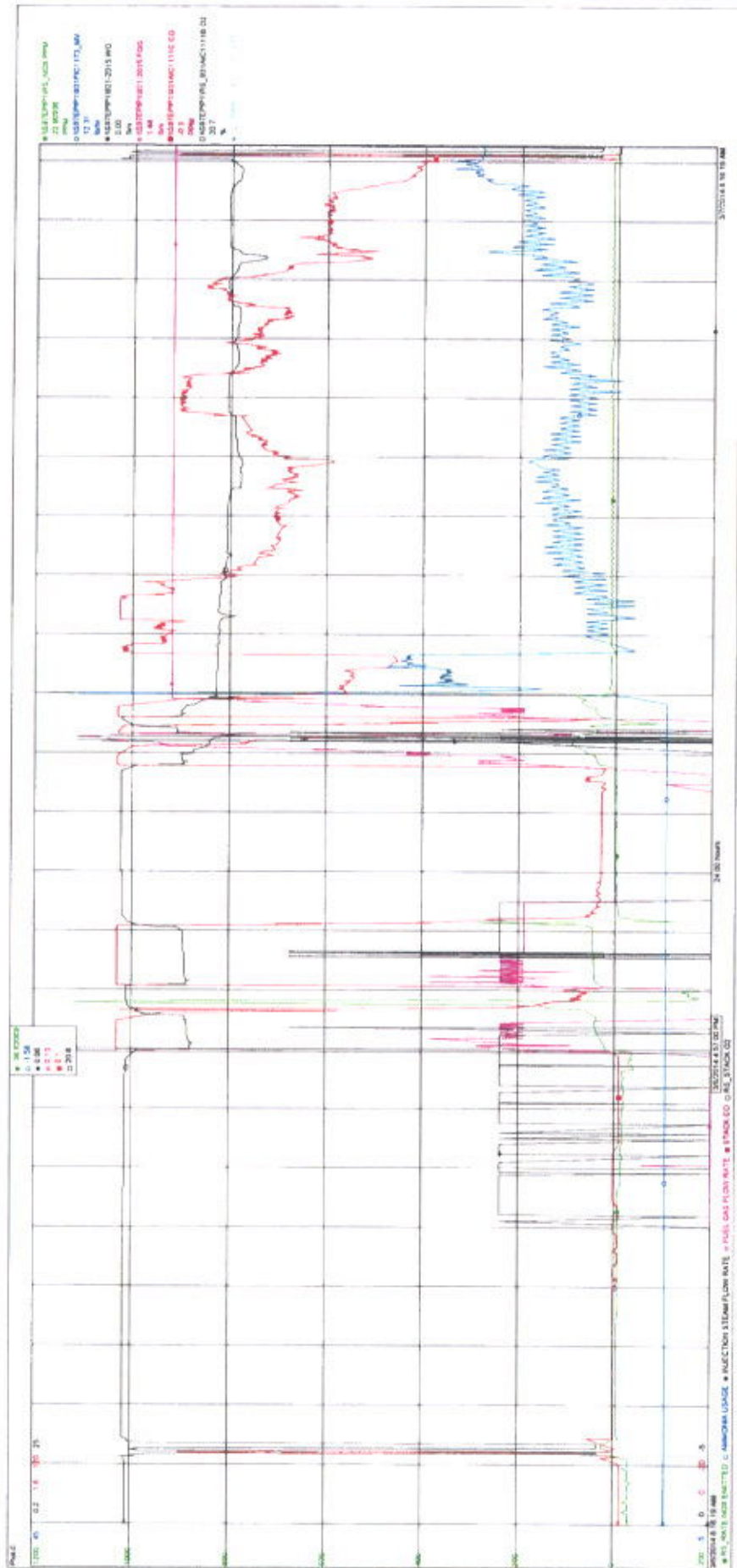
3/8/2014 7:00

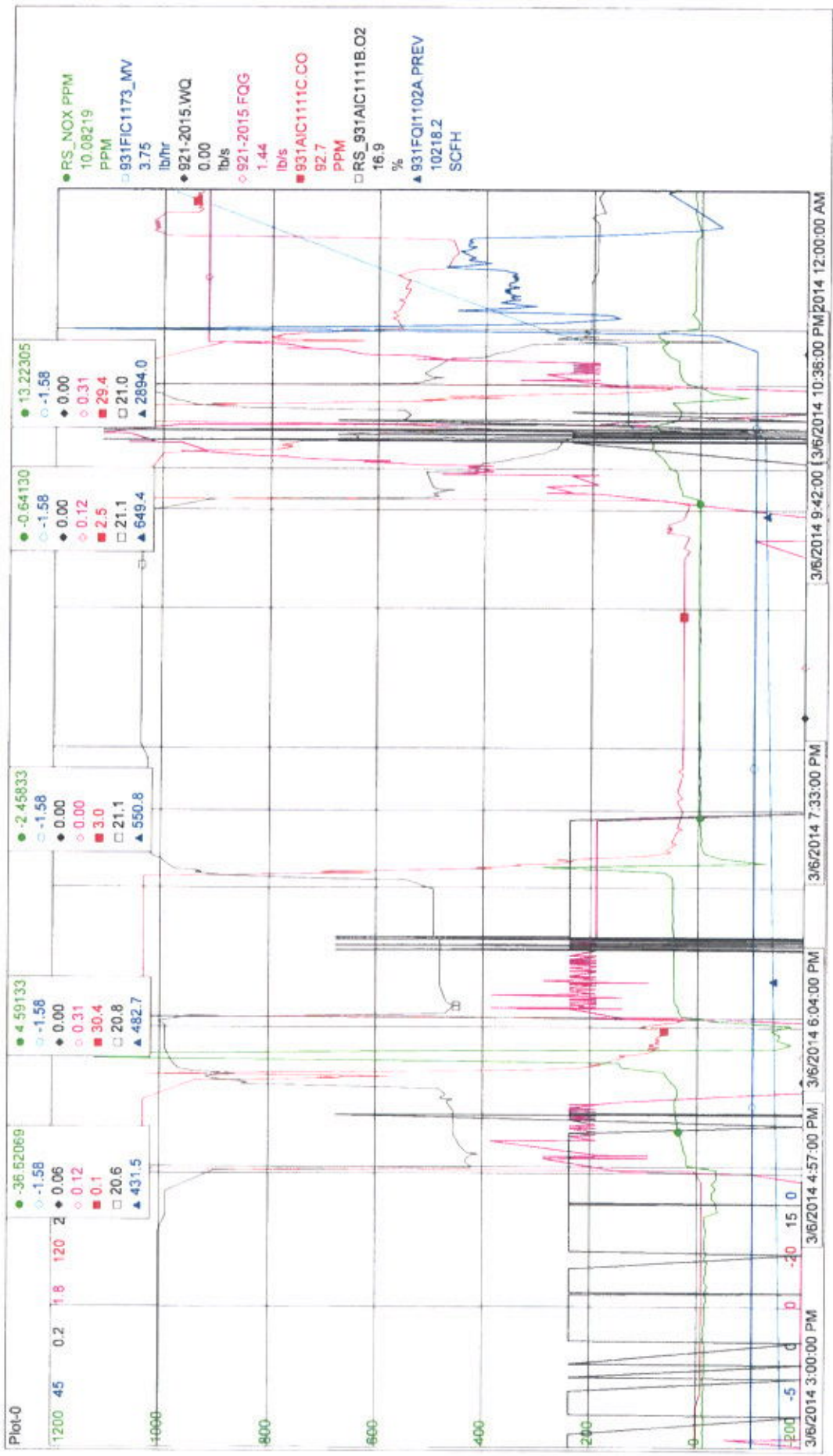
3/7/2014 7:00

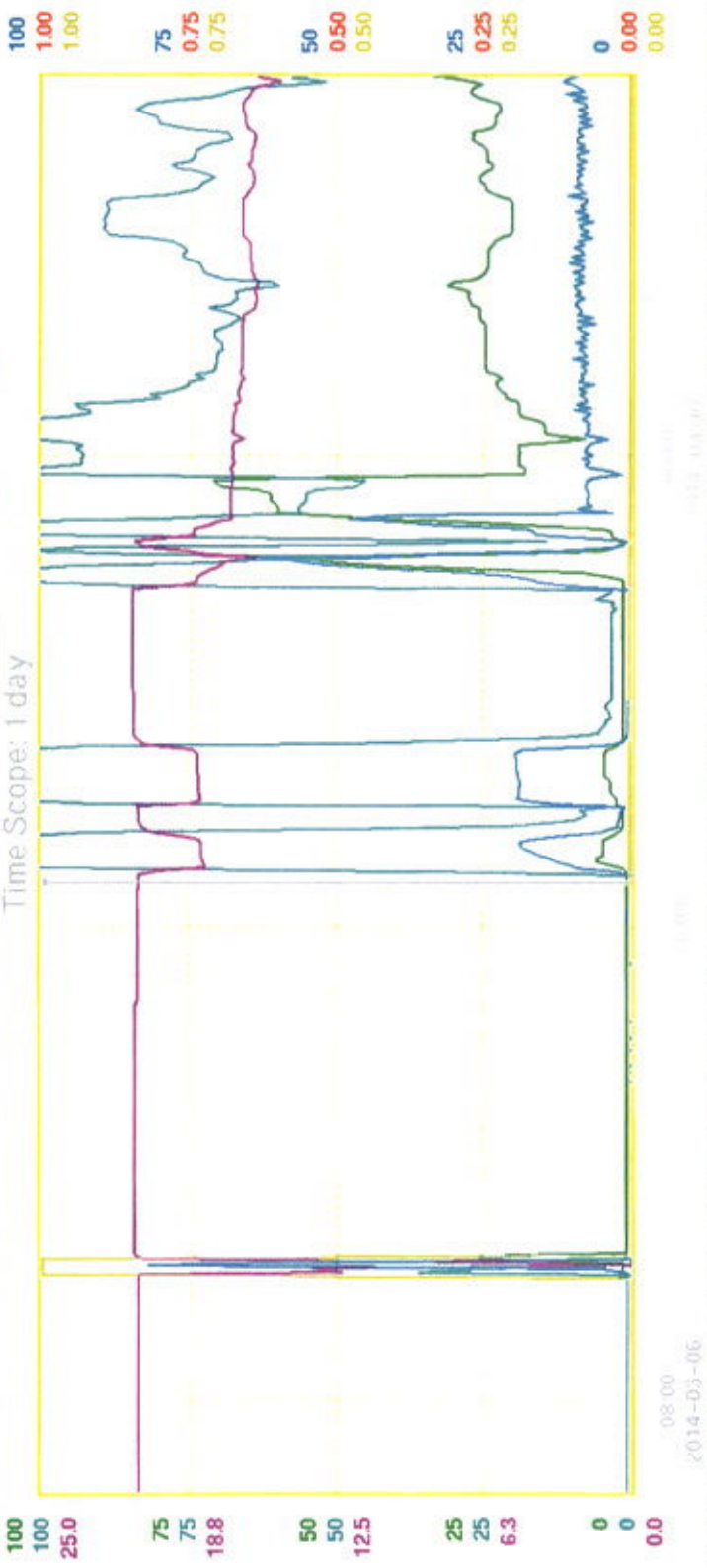
Time	Duct burner gas flow MSCFH	Turbine gas flow MSCFH	SCR Temperature °F	SCR exit NOx ppm	Ammonia usage lb/h	MFO NOx mass ratio	Injection steam rate lb/h	Steam to fuel ratio	NOx lb/h	Stack CO ppm	Stack CO lb/h	Stack 18% O2 ppm	Stack NOx ppm	3hr Running Average NOx	Nebraska O2 %	Nebraska NOx %	Nebraska Corrected NOx (ppm) (3% O2)	Daily Av Cogen NOx lb/h	Daily Av Cogen CO lb/h	Daily Av Cogen/ NOx lb/h
8:00	Good Data For	Good Data For	Good Data For	Good Data For	Good Data For	Good Data For	Good Data For	Good Data For	Good Data For	Good Data For	Good Data For	Good Data For	Good Data For	Good Data For	Good Data For	Good Data For	Good Data For	Good Data For	Good Data For	Good Data For
9:00	Good Data For	Good Data For	Good Data For	Good Data For	Good Data For	Good Data For	Good Data For	Good Data For	Good Data For	Good Data For	Good Data For	Good Data For	Good Data For	Good Data For	Good Data For	Good Data For	Good Data For	Good Data For	Good Data For	Good Data For
10:00	0.05	0.00	497.26	0.09	-1.58	-209022.33	0.00	0.00	0.00	20.93	269.84	0.03	29.75	29.75	25.22	-3.30		3.14		3.14
11:00	0.05	0.00	497.27	0.34	-1.58	-74624.37	0.00	0.00	0.00	21.07	-5.41	0.00	5.38	-17.75	25.27	-3.02				
12:00	0.05	0.00	497.26	0.34	-1.58	-73533.42	0.00	0.00	0.00	21.07	-5.41	0.00	5.24	-17.48	25.38	-3.42				
13:00	0.05	0.00	497.26	0.34	-1.58	-73533.42	0.00	0.00	0.00	21.07	-4.90	0.00	5.19	-5.63	25.48	-3.58				
14:00	0.05	0.00	497.26	0.34	-1.58	-73533.42	0.00	0.15	0.00	21.07	13.71	0.00	5.99	5.81	25.57	-3.78				
15:00	0.05	0.00	497.26	0.34	-1.58	-73533.42	0.05	-104.48	0.00	21.05	3.30	0.00	4.45	-4.84	25.56	-3.98				
16:00	0.05	0.00	497.26	0.34	-1.58	-73533.42	0.05	-87.89	0.00	21.01	27.37	0.00	-16.48	-9.64	25.48	-4.28				
17:00	0.05	1.35	497.27	0.35	-1.58	-109.32	0.06	-109.32	0.00	20.90	67.04	0.12	-2.48	-15.13	25.41	-4.52				
18:00	0.05	2.04	497.26	2.80	-1.58	-14900.98	0.02	0.05	2.55	19.33	938.38	11.85	79.18	14.07	25.51	-4.83				
19:00	0.05	39.45	497.26	3.28	-1.58	-4422.23	0.03	0.05	6.18	18.81	307.87	20.93	34.80	30.50	25.41	-4.77				
20:00	0.05	21.67	497.27	1.28	-1.58	-8090.51	0.03	0.08	1.58	20.91	81.83	18.72	7.76	40.98	25.31	-3.90				
21:00	0.05	0.00	497.27	1.13	-1.58	-22468.54	0.00	0.00	0.00	21.19	-58.38	-8.01	0.37	13.81	25.25	-3.59				
22:00	0.05	9.48	497.27	1.32	-1.58	-20870.27	0.00	0.00	0.00	20.95	0.03	4.65	7.47	4.81	25.31	-3.59				
23:00	3.14	68.90	516.46	21.74	-0.58	-5473.24	0.02	0.01	1.84	18.30	440.55	24.70	30.39	19.23	25.31	-3.59				
0:00	5.95	117.81	562.86	47.90	11.49	1.41	0.00	0.00	5.21	18.98	101.74	28.38	9.82	22.76	25.35	-3.59				
1:00	8.19	117.81	571.27	16.29	3.46	1.39	0.00	0.00	4.82	16.84	140.00	39.73	10.64	23.55	25.44	-3.59				
2:00	6.02	117.81	561.89	23.50	5.75	1.52	0.00	0.00	4.87	16.58	99.38	27.96	10.48	19.05	25.63	-3.59				
3:00	6.02	117.81	565.12	26.50	6.86	1.57	0.00	0.00	4.81	16.23	85.88	23.77	10.50	19.34	25.64	-3.30				
4:00	6.02	117.81	566.30	22.80	5.67	1.39	0.00	0.00	4.76	16.31	101.72	28.38	10.42	16.47	25.62	-3.90				
5:00	6.03	117.81	560.59	22.80	5.45	1.31	0.00	0.00	5.37	16.35	104.92	20.38	11.70	19.87	25.56	-3.49				
6:00	6.04	117.81	565.59	24.29	6.00	1.43	0.00	0.00	4.77	16.28	97.43	27.08	10.51	16.88	25.51	-3.49				
7:00	11.36	117.81	591.38	30.07	7.87	1.53	0.00	0.00	5.06	16.23	79.34	23.78	10.57	15.82	25.50	-4.31				

Comment: Turbine down on 3/8/14 (last day of 4-day annual maintenance outage) from 7:00 AM - 4:57 PM. Cogen tripped as follows during start-up: 5:33 PM - 5:34 PM; 7:37 PM - 7:38 PM; 8:42 PM & 10:25 PM - 10:26 PM; 10:36 PM - 10:38 PM. Total downtime of 12.8 hrs. APCD notified by CWI/son on 3/8/14 at 11:42 PM for modbus signal loss resulting to PI data loss of turbine fuel & steam injection from 3/8/14 @ 10:32 PM to 3/8/14 @ 8:35 AM (9.72 hrs).









ON/Name	Description	Attribute	Treatment	Ruler Time	Ruler Value	Current Value	Unit	Filter	Time Offset	Form
931AIC1111A.NOX	B&W SCR INLET NOX	MV	Mom	16:46 2014-03-06	0.34	56.97	PPM			
931AIC1111C.CO	B&W BLR STACK RAW CO	MV	Mom	16:46 2014-03-06	-0.91	28.77	PPM			
931AIC1111B.O2	B&W BLR RAW O2%	MV	Mean	16:46 2014-03-06	20.95	15.29	%			
931AIC1111D.NOX	B&W BLR STACK NOX	MV	Mean	16:46 2014-03-06	0.24	10.03	PPM			
931-AIC-1111.INCAL	RSM1 CEMS IN CAL	MV	Mom	16:46 2014-03-06	0	0				
931-aic-1111.trb	RSM1 CEMS TROUBLE	MV	Mom	16:46 2014-03-06	0	0				

08:00 2014-03-06

D1 30 minutes D2 1 hour D3 8 hours D4 1 day D5 10 days  
 D6 Positioning... D7 Trace Control... D8 Analyze... D9 Trace Config... D10 Extended Config...



**DAILY ENVIRONMENTAL REPORT**

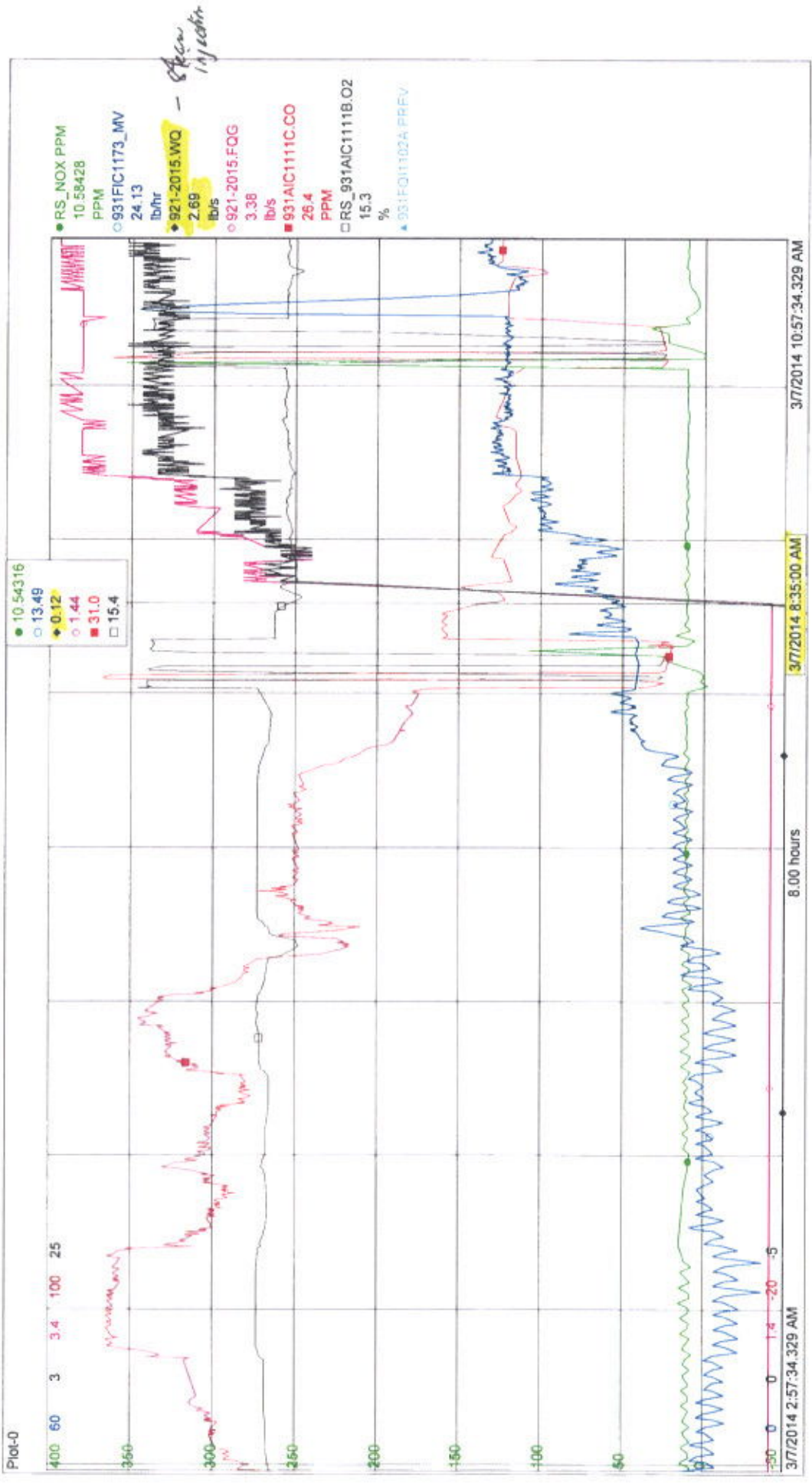
3/10/2014 7:00

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Flow	Duct barrel gas flow MCF/H	Tube line gas flow MCF/H	SO <sub>2</sub> temperature %	SO <sub>2</sub> mol %	SO <sub>2</sub> mol %	Ammonia Usage lb/h	NH <sub>3</sub> NO <sub>x</sub> mol-ppm	Injection rate lbs/hr	Injection Sur ratio	NO <sub>x</sub> lb/h	Stack CO %	Stack CO ppm	Stack CO 15% O <sub>2</sub> lb/h	Stack NO <sub>x</sub> ppm	Stack NO <sub>x</sub> 15% O <sub>2</sub> lb/h	Average NO <sub>x</sub>	Nebraska O <sub>2</sub> %	Nebraska NO <sub>x</sub> %	Nebraska Corrected NO <sub>x</sub> (2% O <sub>2</sub> )	Daily Av Capen NO <sub>x</sub> lb/h	Daily Av Cap/Hob NO <sub>x</sub> lb/h	
6:00	6.10	117.81	583.48	39.27	10.10	1.50	0.00	0.00	0.00	4.86	10.36	69.31	19.20	10.60	10.66	10.66	25.52	-4.21		10.17	10.17	
7:00	20.45	147.85	638.21	48.77	15.75	1.54	1.71	0.21	0.21	8.47	15.12	27.50	13.46	10.62	10.69	10.69	25.52	-4.32				
8:00	16.28	260.21	629.26	64.21	22.77	0.96	2.57	0.75	0.75	10.84	15.38	28.14	17.70	10.97	10.82	10.82	25.50	-4.14				
9:00	8.44	272.02	631.30	67.30	23.44	0.80	2.59	0.77	0.77	8.88	15.26	28.00	16.63	9.94	10.49	10.49	25.49	-4.37				
10:00	7.32	274.73	630.55	67.05	23.96	0.93	2.60	0.79	0.79	11.00	15.33	27.02	17.26	10.48	10.35	10.35	21.34	8.41				
11:00	6.99	271.78	624.18	57.52	20.31	2.35	2.71	0.80	0.80	18.66	15.48	30.85	18.09	10.39	10.27	10.27	25.85	-0.09				
12:00	7.78	259.45	615.38	52.79	17.62	0.82	2.42	0.76	0.76	18.40	15.00	35.12	20.87	10.52	10.46	10.46	25.05	-0.17				
13:00	8.01	272.57	620.81	57.67	19.85	0.81	2.96	0.77	0.77	18.95	15.45	31.57	18.83	10.51	10.49	10.49	25.70	-0.56				
14:00	7.54	265.82	621.35	57.05	19.46	0.93	2.73	0.80	0.80	11.16	15.39	31.88	20.50	10.56	10.54	10.54	25.70	-0.24				
15:00	7.20	279.00	624.10	56.28	19.46	0.93	2.73	0.80	0.80	11.16	15.39	31.88	20.50	10.56	10.54	10.54	25.70	0.22				
16:00	7.34	110.92	623.66	56.47	19.43	20.73	1.16	0.34	0.34	4.89	15.36	31.83	8.17	10.46	10.51	10.51	25.70	0.43				
17:00	8.87	231.72	623.62	57.30	19.57	7.42	2.40	0.71	0.71	8.89	15.36	31.76	16.36	10.50	10.50	10.50	25.71	0.78				
18:00	8.26	276.98	622.13	57.20	19.56	0.89	2.65	0.79	0.79	10.97	15.39	31.91	20.34	10.50	10.49	10.49	25.68	1.10				
19:00	6.37	275.23	621.94	61.59	19.43	0.83	2.62	0.78	0.78	10.94	15.41	32.15	20.49	10.51	10.50	10.50	25.64	1.00				
20:00	6.08	275.25	621.89	62.16	19.38	0.81	2.66	0.78	0.78	10.95	15.41	32.13	20.41	10.49	10.50	10.50	25.61	1.26				
21:00	6.08	276.59	621.85	61.75	19.32	0.81	2.86	0.79	0.79	10.99	15.40	32.10	20.40	10.52	10.51	10.51	25.62	1.21				
22:00	6.12	276.60	621.84	60.82	19.11	0.81	2.85	0.79	0.79	11.01	15.40	32.03	21.09	10.54	10.52	10.52	25.60	1.26				
23:00	6.08	276.58	621.16	60.51	19.00	0.81	2.65	0.78	0.78	10.95	15.42	33.81	21.37	10.47	10.51	10.51	25.65	1.02				
24:00	6.08	276.42	619.41	61.02	19.04	0.81	2.64	0.78	0.78	10.87	15.41	33.54	21.33	10.52	10.51	10.51	25.70	0.73				
25:00	6.13	276.42	619.96	61.96	19.37	0.81	2.65	0.78	0.78	11.03	15.40	33.39	21.21	10.55	10.51	10.51	25.70	0.38				
26:00	6.14	275.42	619.68	60.62	20.82	0.83	2.44	0.78	0.78	10.97	15.41	31.79	20.26	10.60	10.52	10.52	25.71	-0.11				
27:00	6.14	275.74	619.61	64.22	22.17	0.85	2.84	0.78	0.78	10.95	15.47	31.51	20.62	10.50	10.52	10.52	25.71	-0.84				
28:00	6.08	275.07	619.61	64.37	22.12	0.84	2.63	0.78	0.78	10.89	15.50	31.11	19.76	10.46	10.49	10.49	25.71	-0.75				
29:00	7.73	274.84	621.80	64.69	22.27	0.85	2.62	0.78	0.78	10.96	15.48	30.80	19.45	10.50	10.49	10.49	25.71	-1.22				
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Comment:



CHEMICAL PUMPS		TURBINE		GENERATOR		COGEN BOILER		COMPRESSORS		NEBRASKA BOILER																							
Level	Flow m <sup>3</sup> /min	Level	Flow m <sup>3</sup> /min	Level	Flow m <sup>3</sup> /min	Level	Flow m <sup>3</sup> /min	Level	Flow m <sup>3</sup> /min	Level	Flow m <sup>3</sup> /min																						
Scale 3.5 m <sup>3</sup> /min	Control 5.1 m <sup>3</sup> /min	Polymer 5.8 m <sup>3</sup> /min	Gauss (as needed)	FSR	Inlet Temp °F	Humidity %	Vibration (Max) #/SEC	Steam Injection #/SEC	Turbine L.O. Level	148	Gen. Bearing Drain °F	L.O. Supply °F	Gen. Vibration (Max) #/SEC	Tie Line MW	450 Header Temp °F	HP Drum Level	LP Drum Level	HP Drum Pressure PSI	LP Drum Pressure PSI	CO	NOX	DZ	Hot Well Level	Filter Separator PSI	Gas Receiver PSI	Drum Level IN	Drum Pressure PSI	Steam Flow #/HR	Steam Temp °F	NOX	O2	Blow Down Conductivity uMOS	ON LINE TURBINE WATER WASH
NEBRASKA	PERMATE #10	CONDENSATE #10	LP	HP	SCG LP	TURBINE	MAXON	BURNER	HEBRASKA	MFCWATTS																							
14711473	3879808	177762	52298	385	3884790	3012540	9067069	60913	HEBRASKA	59727																							
PREVIOUS 16886364	0	0	0	0	3381450	2923330	906479	0	HEBRASKA	53664																							
AMMUNA DELIVERY	YES NO	TIME	NEBRASKA ONLINE TIME	FROM	NEBRASKA WARM STORAGE CHECK	YES NO	NEBRASKA	DAY SHIFT	NIGHT SHIFT																								
7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	10:00	10:00																							
BATTERIES	IN/1020 HP RECUMPE	FAL BATTERIES	FAL AIR INLET DIF	FAL HP RECUMPE	V HP RECUMPE	FAL	HP - pH 8.5 - 9.5	CONDUCTIVITY < 20mmhos	PH - pH 8.5 - 9.5	CONDUCTIVITY < 20mmhos																							
L.O. DIFFERENTIAL	PSI HP RECUMPE	ART L.O. DIFFERENTIAL	ART L.O. DIFFERENTIAL	PSI HP RECUMPE	PSI HP RECUMPE	ART	Conductivity < 20mmhos	PH - pH 8.5 - 9.5	Conductivity < 20mmhos	HP																							
7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00	5:00																							
GEN. FIELD	AMPS GEN VARS	MEGA VARS	V FIELD	F FIELD	AMPS GEN VARS	MEGA VARS	V FIELD	F FIELD	AMPS GEN VARS	MEGA VARS																							
COOLING TWR INLET	F COOLING TWR INLET	F COOLING TWR INLET	F COOLING TWR INLET	F COOLING TWR INLET	F COOLING TWR INLET	F COOLING TWR INLET	F COOLING TWR INLET	F COOLING TWR INLET	F COOLING TWR INLET	F COOLING TWR INLET																							
7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00	5:00																							
1150 SET POINT	1103 B SET POINT	1150 SET POINT	1103 B SET POINT	1150 SET POINT	1103 B SET POINT	1150 SET POINT	1103 B SET POINT	1150 SET POINT	1103 B SET POINT	1150 SET POINT																							
SCANNER BLOWER (ON) Y/N	DUCT BURNER	SP	SCANNER BLOWER (ON) Y/N	DUCT BURNER S.P.	SP	SCANNER BLOWER (ON) Y/N	DUCT BURNER S.P.	SP	SCANNER BLOWER (ON) Y/N	DUCT BURNER S.P.																							
7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00	5:00																							
NEBRASKA	PH 9.5 - 10.5	CONDUCTIVITY 75 - 200	PHOSPHATE 5 - 25 ppm	SILICA < 20 ppb	MOYBDATE > 200 ppm	NEBRASKA	PH 9.5 - 10.5	CONDUCTIVITY 75 - 200	PHOSPHATE 5 - 25 ppm	SILICA < 20 ppb																							
7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00	5:00																							
NEBRASKA	PH 9.5 - 10.5	CONDUCTIVITY 75 - 200	PHOSPHATE 5 - 25 ppm	SILICA < 20 ppb	MOYBDATE > 200 ppm	NEBRASKA	PH 9.5 - 10.5	CONDUCTIVITY 75 - 200	PHOSPHATE 5 - 25 ppm	SILICA < 20 ppb																							
7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00	5:00																							
NEBRASKA	PH 9.5 - 10.5	CONDUCTIVITY 75 - 200	PHOSPHATE 5 - 25 ppm	SILICA < 20 ppb	MOYBDATE > 200 ppm	NEBRASKA	PH 9.5 - 10.5	CONDUCTIVITY 75 - 200	PHOSPHATE 5 - 25 ppm	SILICA < 20 ppb																							

# OFFICIAL DAILY COGENERATION LOG

NAME: ROB NIGHT SHIFT OPERATOR  
 NAME: MH DRY SHIFT OPERATOR

NEBRASKA PAPER MILL

NEBRASKA COGENERATION LOG

DRY SHIFT OPERATOR

NAME: \_\_\_\_\_

NIGHT SHIFT OPERATOR

NAME: \_\_\_\_\_

CAL PUMPS	Level	Feed Rate ml/min	NEBRASKA		PERMATE H <sub>2</sub> O		CONCENTRATE H <sub>2</sub> O		LP		HP		SEC LP		TURBINE		GAS & ELECTRIC READING	
			CURRENT PREVIOUS	NEW DEMIN TRAILER	YES	NO	TIME	NEBRASKA ONLINE TIME	FROM	TO	HP REC	SEC LP	TURBINE	MAXON	BURNER	NEBRASKA	ITTS	
Steam 3.9 ml/min			10445045	3585501	1819821	203690	1870	379250	3012540	18353	186023							
Central 3.3 ml/min			18711473	3879808	177742	52298	305	3884490	60913									
Paymer 6.8 ml/min																		
Caustic (as needed)																		

TURBINE	AMMONIA DELIVERY		% FULL		NEBRASKA WARM STORAGE CHECK		BOILER FEEDWATER		BOILER TEST RESULTS	
	YES	NO	NO	%	19:00	21:00	23:00	1:00	3:00	5:00
FSR	7-00	9-00	11-00	13-00	15-00	17-00	19-00	21-00	23-00	1:00
Inlet Temp	28.6	23.6	22.2	22.2	22.2	22.2	22.2	22.2	22.2	22.2
Humidity	63	68	70	70	70	70	70	70	70	70
Vibration (Max)	30	23	22	22	22	22	22	22	22	22
Steam Injection	14	14	14	14	14	14	14	14	14	14
Turbine L.O. Level	100	100	100	100	100	100	100	100	100	100
148	100	100	100	100	100	100	100	100	100	100

GENERATOR	AIR INLET DIFF		L.O. DIFFERENTIAL		FAR		AIR INLET DFT		L.O. DIFFERENTIAL		FAR	
	IN/H20	HP REC	PSI	HP REC	PSI	HP REC	IN/H20	HP REC	PSI	HP REC	PSI	HP REC
Gen. Bearing Drain	7-00	9-00	11-00	13-00	15-00	17-00	19-00	21-00	23-00	1:00	3:00	5:00
L.O. Supply	15.2	15.5	15.6	15.6	15.6	15.6	15.6	15.6	15.6	15.6	15.6	15.6
Gen. Vibration (Max)	17.3	12.3	12.3	12.5	12.5	12.5	12.4	12.4	12.3	12.2	12.2	12.2
Tie Line	3.05	13.58	13.48	13.52	13.53	13.53	13.44	13.44	13.48	13.50	13.52	13.44

COGEN BOILER	COOLING THW INLET		FIELD		MEGA VARS		GEN. VARS		AMPS		FIELD VOLTS		COOLING THW INLET		FIELD VOLTS	
	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F	
450 Header Temp	7-00	9-00	11-00	13-00	15-00	17-00	19-00	21-00	23-00	1:00	3:00	5:00				
HP Drum Level	698	707	707	710	710	710	710	710	710	710	710	710				
LP Drum Level	0.8	1.1	1.1	1.1	1.1	1.1	1.1	1.1	1.1	1.1	1.1	1.1				
HP Drum Pressure	417	485	482	482	482	482	482	482	482	482	482	482				
LP Drum Pressure	151	152	148	148	148	148	148	148	148	148	148	148				
CO	75.9	25.3	27.1	30.7	31.6	32.2	32.2	32.2	32.2	32.2	32.2	32.2				
NOX	10.3	10.7	10.5	10.6	10.4	10.5	10.5	10.6	10.6	10.6	10.6	10.4				
Hot Well Level	14.3	15.43	15.21	15.68	15.46	15.34	15.40	15.40	15.40	15.40	15.40	15.52				

COMPRESSORS	SCANNER BLOWER (ON) Y/N		DUCT BURNER		SP		1150 SET POINT		1103 B SET POINT		DUCT BURNER S.P.	
	NO	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO	YES
Filter Separator	7-00	9-00	11-00	13-00	15-00	17-00	19-00	21-00	23-00	1:00	3:00	5:00
Gas Receiver	2.40	2.76	2.76	2.76	2.76	2.76	2.76	2.76	2.76	2.76	2.76	2.76
	4720	4720	470	470	470	470	470	470	470	470	470	470

NEBRASKA BOILER	DRUM LEVEL		DRUM PRESSURE		STEAM FLOW		STEAM TEMP		NOX		O <sub>2</sub>		BLOW DOWN CONDUCTIVITY	
	IN	PSI	PSI	PSI	#/HR	°F	PPM	PPM	%	%	µS/cm	µS/cm	µS/cm	
Drum Level	7-00	9-00	11-00	13-00	15-00	17-00	19-00	21-00	23-00	1:00	3:00	5:00		
Drum Pressure	2.40	2.76	2.76	2.76	2.76	2.76	2.76	2.76	2.76	2.76	2.76	2.76		
Steam Flow	4720	4720	470	470	470	470	470	470	470	470	470	470		
Steam Temp														
NOX														
O <sub>2</sub>														
Blow Down Conductivity														

PHOSPHATE 5-25 ppm

SILICA <20 ppb

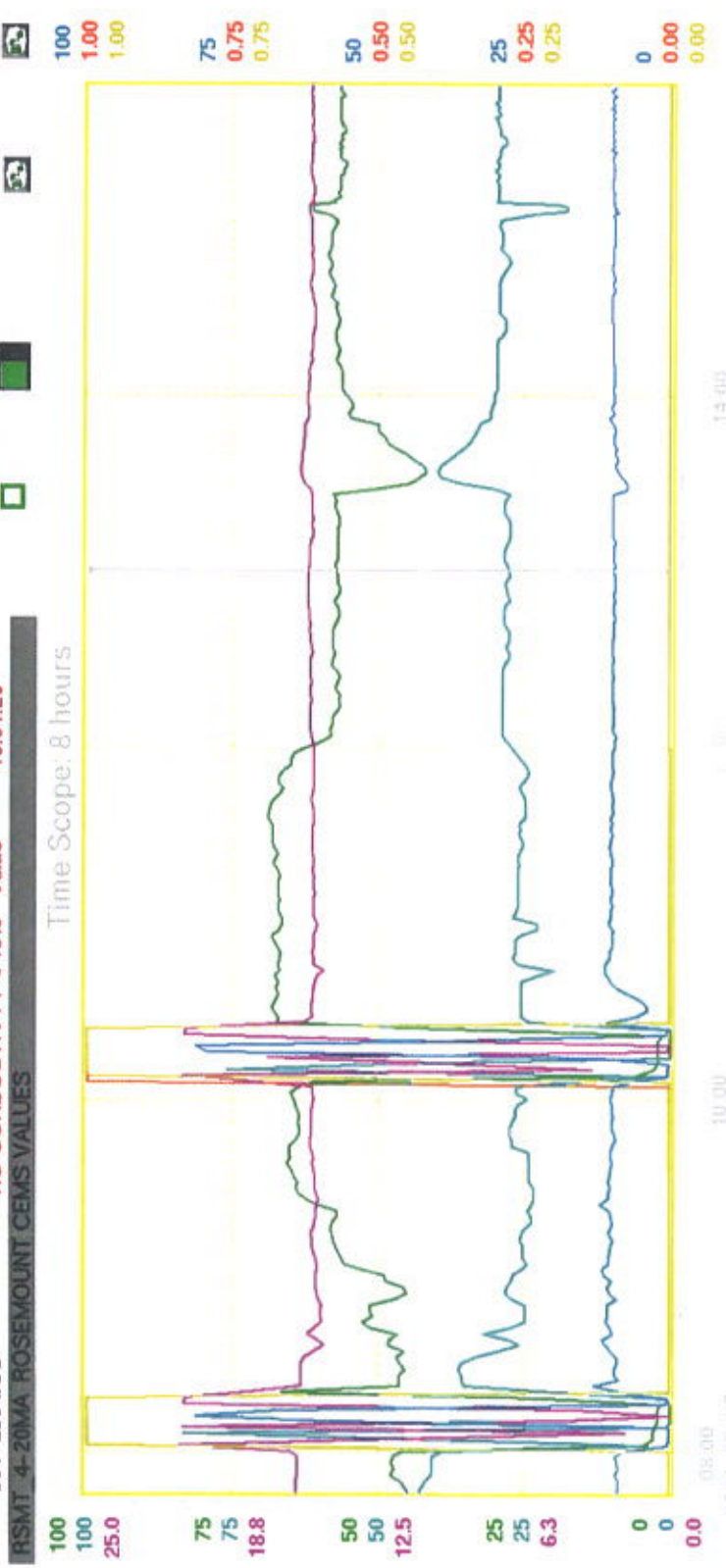
MOYBILITE >200 ppm

NOTES:

SAFETY IS ALWAYS NO. 1  
 DATE: 3-8-14  
 NAME: NIGHT SHIFT OPERATOR  
 NAME: DRY SHIFT OPERATOR

TAL PUMPS		NEBRASKA		PERMATE H <sub>2</sub> O		CONCENTRATE H <sub>2</sub> O		LP		HP		SCG LP		TURBINE		GAS & ELECTRIC READING	
Level	Feed Rate ml/min	CURRENT	PREVIOUS	NEW DEMIN TRAILER	YES	NO	TIME	% FULL	NEBRASKA WARM STORAGE CHECK	NEBRASKA ONLINE TIME	FROM	TO	YES	NO	BOILER FEEDWATER	DAY SHIFT	NIGHT SHIFT
Shamate 3.9 ml/min		16881036	40336239	18639418			17:00	17:00	19:00	23:00	23:00	3:00	3:00	5:00	pH 8.75-9.5	DAY SHIFT	NIGHT SHIFT
Conryl 5.3 ml/min		16845045	3985501	1879221			17:00	17:00	19:00	23:00	23:00	3:00	3:00	5:00	Conductivity <5mmhos	DAY SHIFT	NIGHT SHIFT
Polymer 6.8 ml/min							17:00	17:00	19:00	23:00	23:00	3:00	3:00	5:00	Silica <20 ppb	DAY SHIFT	NIGHT SHIFT
Coatic (as needed)							17:00	17:00	19:00	23:00	23:00	3:00	3:00	5:00	R.O.	DAY SHIFT	NIGHT SHIFT
FSR	%	58.25	62.54	57.25	57.19	57.25	7.00	17:00	19:00	23:00	23:00	3:00	3:00	5:00	Feed TDS <1000 ppm	DAY SHIFT	NIGHT SHIFT
Inlet Temp	°F	58	58	58	58	58	7:00	17:00	19:00	23:00	23:00	3:00	3:00	5:00	Permeate TDS <10 ppm	DAY SHIFT	NIGHT SHIFT
Humidity	%	9.7	5.8	3.6	10.4	16.3	7:00	17:00	19:00	23:00	23:00	3:00	3:00	5:00	pH (Feed 7.5)	DAY SHIFT	NIGHT SHIFT
Vibration (Max)	MILS	2.2	2.3	2.1	2.0	2.1	7:00	17:00	19:00	23:00	23:00	3:00	3:00	5:00	CONDENSATE	DAY SHIFT	NIGHT SHIFT
Steam Injection	#/SEC	2.69	2.75	2.68	2.75	2.75	7:00	17:00	19:00	23:00	23:00	3:00	3:00	5:00	HP-pH 8.5-9.5	DAY SHIFT	NIGHT SHIFT
Turbine L.O. Level	%	100	100	100	100	100	7:00	17:00	19:00	23:00	23:00	3:00	3:00	5:00	Conductivity <20mmhos	DAY SHIFT	NIGHT SHIFT
148	%	1448	1456	1447	1447	1447	7:00	17:00	19:00	23:00	23:00	3:00	3:00	5:00	Conductivity <20mmhos	DAY SHIFT	NIGHT SHIFT
TURBINE																	
BATTERIES																	
AIR INLET DIFF																	
L.O. DIFFERENTIAL																	
IN/OUT HP RECOURSE																	
PSI HP RECOURSE																	
AIR INLET DIFF 3.2 IN/OUT HP RECOURSE																	
L.O. DIFFERENTIAL PSI HP RECOURSE																	
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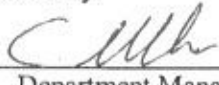
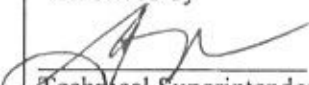
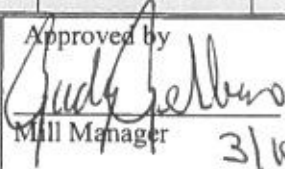
ON/Name	Description	Attribute	Treatment	Ruler Time	Ruler Value	Current Value	Unit	Filter	Time Offset	Form
931AIC1111A.NOX	B&W SCR INLET NOX	MV	Mom	13:00	57.32	56.97	PPM			
931AIC1111C.CO	B&W BLR STACK RAW CO	MV	Mom	13:00	27.81	29.69	PPM			
931AIC1111B.O2	B&W BLR RAW O2%	MV	Mean	13:00	15.57	15.37	%			
931AIC1111D.NOX	B&W BLR STACK NOX	MV	Mean	13:00	9.49	9.72	PPM			
931-AIC-1111.INCAL	RSMT CEMS IN CAL	MV	Mom	13:00	0	0				
931-aic-1111.trb	RSMT CEMS TROUBLE	MV	Mom	13:00	0	0				

D1 30 minutes	D2 1 hour	D3 6 hours	D4 1 day	D5 10 days
D6 Positioning...	D7 Trace Control...	D8 Analyze...	D9 Trace Config...	D10 Extended Config...



## Hueneme Mill Environmental Incident Report

Shaded section to be completed by the EMR

Name of Incident Modbus data communication failure		Incident Date March 6, 2014	
Exact Location Incident: Cogen			
Reported By Charlie Wilson		Estimated Start and Stop Times of Incident: 3/6/14-@22:52- 3/7/14-08:41	Root Cause: MUXA box settings- new HMI system installed.
Incident Type: <input type="checkbox"/> Spill Internal <input type="checkbox"/> Improper Waste Disposal <input type="checkbox"/> Spill External <input type="checkbox"/> Near miss or below spill release guidelines <input checked="" type="checkbox"/> Air Emission <input type="checkbox"/> Other _____		Released To <input type="checkbox"/> Storm Water System <input type="checkbox"/> Secondary Containment <input type="checkbox"/> Process Sewer <input type="checkbox"/> Air <input type="checkbox"/> Ground (External) <input type="checkbox"/> Ground (Inside Mill Property) <input checked="" type="checkbox"/> Near Miss <input type="checkbox"/> Other _____	
Detailed Description of Event At 23:42 on Mar 6, 2014, Maint Manager- was in cogen control cab during start-up of Cogeneration plant after 4 day annual outage work. Observed that the Modbus data- was not updating. Maintenance manager proceeded to call APCD, left a message as to the nature of the call at 23:42. New HMI systems had been set up during the annual outage- and configuration from past serial communication to Mill DCS is now- a Ethernet/ converted to serial- but now allows for redundant back up of Modbus signals should primary modbus connection fail. Since it was new HMI system set up during annual outage- some configuration settings needed to be amended. On 3/7/14- when contractor came in to continue verification process for new HMIs. . (if required use additional paper and attach)			
Estimated Amount Released		pH	CONSISTENCY (%)
<input type="checkbox"/> _____ Gallons <input type="checkbox"/> _____ Pounds <input type="checkbox"/> Other _____			
List Any External Emergency Clean Up Personnel Contacted N/A		List Any External Agencies Contacted (Agency, person and time of call.) . APCD left phone message as per recording.	
List Hueneme Personnel Contacted , Charlie Wilson, Jim Grimme, KTR- configuring new HMIs- CSE		Any Acute or Chronic Health Risks (refer to MSDS) N/A	
Describe Any Emergency Response Actions:			
Suggestions to Prevent Reoccurrence			Estimated Completion Date
1. N/A – outside mill control			1.
2.			2.
Root Cause after investigation Investigation showed configuration setting no "MUXA" box had to be amended- done and for past 3 hours- no issues with Modbus.			Severity Level (level 1 and 2 must be tracked through SHIMS) <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4
Investigated By Charlie Wilson			Investigated Date 3/7/14
Follow Up N/A	By When	Completion Date	By Whom
Issued by  Department Manager	Reviewed by  Technical Superintendent 3/7/14	Approved by  Mill Manager      3/10/2014	

3/7/14

Print Time: 3/7/2014 1:39:25 PM

Note: This document is valid for only ONE week after print time!

**NEW INDY OXNARD**  
5936 Perkins Road,  
Oxnard, CA 93033

**Attn: Robyn Lebrilla**

**LM2500 – PK GENERAL ELECTRIC  
GAS TURBINE  
ANNUAL COMPLIANCE and RATA EMISSIONS TESTING  
PTO #0157  
March 25, 2014**

Submitted to:  
**Ventura County Air Pollution Control District**  
669 County Square Drive  
Ventura, California 93003

**Attn: Lyle Olson**

Prepared by:  
**AIRx Testing Services, Inc.**  
2472 Eastman Avenue #34  
Ventura, CA 93003

Job No.: 23022

Lab No.: 214-028

Ryan Yanagihara  
Test Team Leader

Reviewed by:  
Tom Porter

Submitted  
**April 9, 2014**

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**SUMMARY OF SOURCE TEST RESULTS**

**New Indy  
Gas Turbine  
Rosemount CEM  
3/25/2014**

<b>CONSTITUENTS</b>	<b>Run 1</b>	<b>Run 2</b>	<b>Run 3</b>	<b>Average</b>	<b>Allowable</b>
<b>NOx, ppmv:</b>	<b>10.6</b>	<b>9.7</b>	<b>9.8</b>	<b>10.1</b>	<b>-</b>
<b>NOx ppmv @ 15 % O2:</b>	<b>11.5</b>	<b>10.5</b>	<b>10.7</b>	<b>10.9</b>	<b>12</b>
<b>NOx, lb/hr:</b>	<b>11.78</b>	<b>10.81</b>	<b>11.01</b>	<b>11.20</b>	<b>-</b>
<b>NOx, lb/MMBtu</b>	<b>0.0014</b>	<b>0.0012</b>	<b>0.0013</b>	<b>0.0013</b>	<b>-</b>
<b>CO, ppmv:</b>	<b>25.6</b>	<b>23.7</b>	<b>23.5</b>	<b>24.3</b>	<b>-</b>
<b>CO, ppmv @ 15% O2:</b>	<b>27.7</b>	<b>25.6</b>	<b>25.6</b>	<b>26.3</b>	<b>-</b>
<b>CO, lb/hr:</b>	<b>17.23</b>	<b>16.05</b>	<b>16.00</b>	<b>16.43</b>	<b>59.65</b>
<b>CO, lb/MMBtu</b>	<b>0.0020</b>	<b>0.0018</b>	<b>0.0018</b>	<b>0.0019</b>	<b>-</b>
<b>O2, %:</b>	<b>15.5</b>	<b>15.4</b>	<b>15.5</b>	<b>15.5</b>	<b>-</b>
<b>NH3, ppmv:</b>	<b>2.9</b>	<b>3.1</b>	<b>3.4</b>	<b>3.1</b>	<b>-</b>
<b>NH3, ppmv @ 15% O2:</b>	<b>3.1</b>	<b>3.4</b>	<b>3.7</b>	<b>3.4</b>	<b>20</b>
<b>Stack Flow:</b>	<b>154671</b>	<b>155356</b>	<b>156507</b>	<b>155511</b>	<b>-</b>
<b>Ammonia Injection Rate, lb/hr (avg):</b>	<b>20.13</b>	<b>20.52</b>	<b>21.11</b>	<b>20.59</b>	<b>-</b>
<b>Fuel Usage (Turbine &amp; Duct), dscfm:</b>	<b>4403.6</b>	<b>4450.4</b>	<b>4421.3</b>	<b>4425.1</b>	<b>-</b>
<b>Turbine Load, MWh (avg):</b>	<b>23.81</b>	<b>23.83</b>	<b>23.81</b>	<b>23.82</b>	<b>-</b>

New Indy  
Turbine  
3/25/2014  
  
CEMS RATA  
Calculations

Run	AIRx Testing - Reference Method		
	NOx ppmv @ 15% O2	O2 Dry %	CO ppmv @ 15% O2
1	11.3	15.5	28.2
2	11.7	15.5	28.0
3	11.9	15.5	27.6
4	10.2	15.4	26.0
5	10.1	15.4	25.6
6	11.1	15.4	25.0
7	10.5	15.5	26.4
8	10.4	15.5	26.3
9	11.1	15.4	24.3

Run	New Indy		CEMS
	NOx ppmv @ 15%	O2 Dry %	CO ppmv @ 15%
1	10.5	15.6	29.9
2	10.5	15.6	29.6
3	10.6	15.5	29.3
4	10.4	15.5	28.0
5	10.4	15.5	27.6
6	10.5	15.5	26.8
7	10.5	15.5	28.3
8	10.6	15.5	28.1
9	10.5	15.4	26.3

Run	Reference Method - CEM, Difference		
	NOx ppmv @ 15%	O2 Dry %	CO ppmv @ 15%
1	0.7	-0.1	-1.8
2	1.2	-0.1	-1.6
3	1.4	0.0	-1.6
4	-0.2	-0.1	-2.1
5	-0.3	-0.1	-1.9
6	0.5	-0.1	-1.8
7	0.0	0.0	-1.9
8	-0.2	0.0	-1.8
9	0.5	0.0	-2.0

Arithmetic Mean, d  
Standard Deviation, Sd  
Confidence Coefficient, CC  
Avg Reference Method, RM  
Relative Accuracy, RA

		<b>28.2</b>
	0.4	1.2
	0.6	0.2
	0.5	0.1
	10.9	26.4
	<b>8.1</b>	<b>5.0</b>

NOTE: Calculations based on "Code of Federal Regulations 40", 1988, Part 60, Appendix B, Specification 2, p. 939.

# INTRODUCTION

## 1.0 INTRODUCTION

On March 25, 2014 AIRx Testing Services conducted the annual compliance/RATA source test on a natural gas fired General Electric LM2500-PK Gas Turbine. The unit is located at the New Indy Plant on Perkins Road, in Oxnard. The turbine is used for the generation of electrical power and process heat for the facility operations. The tests were required to satisfy requirements detailed in PTO #0157.

The objective of the testing was to determine NO<sub>x</sub>, CO and NH<sub>3</sub> emissions from the unit at one (1) operating load of approximately 100% capacity. Additionally, data taken from the compliance tests was used to determine the relative accuracy (RATA) of the facility CEM (Rosemont) equipment. Operational data reported by New Indy personnel was turbine and duct burner fuel usage (mscfh), Ammonia injection rate (lb/hr) and turbine load (KW).

**PROCESS DETAILS:** The LM2500-PK is rated for 290 MMBtu/hr heat input and exhausts into an HRSG with a COEN duct burner. The duct burner is rated at 50.8 MMBtu/hr. Emissions are controlled with a Babcock-Hitachi Selective Catalytic Converter (SCR). The SCR uses ammonia injection for NO<sub>x</sub> reduction. The duct dimensions at the sample location are 54" x 125". An integrated sampling probe has been installed by the facility. All sampling was performed from the integrated sampling probe. The sample port locations are located zero diameters upstream and one (1) equivalent diameter downstream from a disturbance; consequently velocity traverses could not be accurately performed.

**CEM DATA:** CEM data was recorded by the Data Acquisition System (DAS) during the test program in the form of one (1) minute averages. The one (1) minute data averages were then printed out and averaged to obtain CEM data for comparison to the RM data. The CEM data was obtained by plant personnel during the test program and provided to the test team. The CEM data monitored NO<sub>x</sub> and CO concentrations corrected to 15% oxygen, oxygen concentrations. NO<sub>x</sub>, CO and O<sub>2</sub> response times were conducted prior to the start of the testing.

**CONTINUOUS MONITORS:** NO<sub>x</sub>, CO, and O<sub>2</sub> sampling utilized a stainless steel multi-point sampling probe connected with a Teflon sampling line to a sample conditioner. The dry gases were then transported through a Teflon line to the sample gas flow panel for distribution to the individual analyzers. Triplicate 96 minute sampling for NO<sub>x</sub>, CO and O<sub>2</sub> was performed in accordance with CARB Method 100 and EPA Method 20. NO<sub>x</sub> measurements were made utilizing an API 200EH chemiluminescent analyzer. CO concentrations were determined with an API 300EM NDIR w/GFC analyzer. Oxygen concentration was measured utilizing a Servomex Model 1400 paramagnetic analyzer. Initial three (3) point calibrations were performed at the analyzers. Subsequent calibrations were performed through the sample system probe tip (Bias checks). All initial bias checks correlated with the initial instrument calibrations to within 2% of analyzer range. Bias calibrations were performed before and after each test run and used to correct the emissions data for any analyzer drift. All monitor calibrations were performed with EPA Protocol 1 calibration gases.

During all tests, the NO<sub>x</sub> and O<sub>2</sub> RM analyzers were operated on the 25 ppmv and 25% scales, respectively. The CO monitor was setup and calibrated for operation on the 50 ppmv scale.

There were no deviations from CARB Method 100 or EPA Method 20 methodology during the test.



## 1.0 INTRODUCTION (cont)

All monitored data was continuously recorded on a 10" analog chart recorder. Chart speed was maintained at 10 cm/hr. Analyzer output was also recorded with a PC based Data Acquisition System (DAS) and imported into spreadsheets for determination of average run concentrations.

**FLOWRATE:** Stack flow calculations were performed using fuel consumption data provided by plant personnel (turbine and duct burner fuel usages added together) and the stack oxygen, in accordance with EPA Method 19.

**AMMONIA:** Exhaust duct ammonia samples were collected and analyzed in accordance with BAAQMD Method ST-1B. The sample train consists of four (4) iced impingers, the first two (2) contained approximately 150 ml 0.1N HCl, the third is empty and the fourth contains silica gel. The sample was collected utilizing an EPA Method 5 sampling console. Each sample was collected for a 96 minute period. Three (3) samples were collected for compliance determination. Samples were collected utilizing stainless steel sampling probe. Analysis of the collected ammonia samples was performed by the AIRx Testing Services laboratory.

All reporting and calculations have been performed using VCAPCD standard conditions of 68°F and 29.92 inches of Hg. If you have any questions regarding this test program or report, please contact the undersigned at (805) 644-1099.

Respectfully Submitted  
AIRx Testing Services, Inc.



Ryan Yanagihara  
Senior Engineer



Tom Porter  
Vice President of Testing Services

<b>CALCULATIONS</b>
---------------------

**CONTINUOUS EMISSIONS MONITORING - CARB METHOD 1-100**

Client : New Indy  
 Site : Oxnard  
 Unit : Turbine

Date : 3/25/2014  
 Job# : 23022  
 Lab# : 214-028

**FIELD DATA**

Test Length      96      mins.      Points 1 Minute

Standard Temperature:      68 ° F

**Drift Corrected Emissions Data**

	<i>Run #1</i>	<i>Run #2</i>	<i>Run #3</i>
<b>Outlet</b>			
NOx	<u>10.6</u> ppm	<u>9.7</u> ppm	<u>9.8</u> ppm
O2	<u>15.5</u> %	<u>15.4</u> %	<u>15.5</u> %
CO	<u>25.6</u> ppm	<u>23.7</u> ppm	<u>23.5</u> ppm

**Process Data**

Exhaust Flow	<u>154671</u> dscfm	<u>155356</u> dscfm	<u>156507</u> dscfm
F-Factor	<u>8710</u> dscf/MMBtu	<u>8710</u> dscf/MMBtu	<u>8710</u> dscf/MMBtu

*Equations used;*

$$T_{fact} = (10^{-6} * (29.92 / (21.85 * (46 + T_{std})))) * 60$$

$$lb/hr = [ppmv] * Q * MW * (T_{fact})$$

$$lb/MM Btu = [lb/hr] / [MMBtu/hr]$$

$$ppmv @ 15\% O_2 = ppm * 5.9(20.9 / (20.9 - O_2))$$

$$MW NO_x = 46; CO = 28$$

**CALCULATED EMISSIONS**

NOx	<u>11.5</u> ppm @ 15% O <sub>2</sub> <u>11.78</u> lb/hr <u>0.0014</u> lb/MMBtu	<u>10.5</u> ppm @ 15% O <sub>2</sub> <u>10.81</u> lb/hr <u>0.0012</u> lb/MMBtu	<u>10.7</u> ppm @ 15% O <sub>2</sub> <u>11.01</u> lb/hr <u>0.0013</u> lb/MMBtu
CO	<u>27.7</u> ppm @ 15% O <sub>2</sub> <u>17.23</u> lb/hr <u>0.0020</u> lb/MMBtu	<u>25.6</u> ppm @ 15% O <sub>2</sub> <u>16.05</u> lb/hr <u>0.0018</u> lb/MMBtu	<u>25.6</u> ppm @ 15% O <sub>2</sub> <u>16.00</u> lb/hr <u>0.0018</u> lb/MMBtu

## Compliance Bias Adjustment

Facility: International Paper  
 Source: Turbine  
 Date: 03/25/14

### Compliance Testing Run No. 1

Parameter	Measured Conc. (ppm,%)	Reference Span gas (ppm.%)	Initial Bias Zero (ppm.%)	Final Bias Zero (ppm.%)	Average Bias Zero (ppm.%)	Initial Bias Span (ppm.%)	Final Bias Span (ppm.%)	Average Bias Span (ppm.%)	Bias Adjusted Conc. (ppm.%)
NOx	10.4	11.4	-0.1	0.1	0.0	11.1	11.2	11.2	<b>10.6</b>
O2	15.5	12.1	-0.2	-0.1	-0.2	12.1	12.1	12.1	<b>15.5</b>
CO	25.7	19.6	0.0	-0.2	-0.1	19.9	19.4	19.7	<b>25.6</b>

### Run No. 2

Parameter	Measured Conc. (ppm,%)	Reference Span gas (ppm.%)	Initial Bias Zero (ppm.%)	Final Bias Zero (ppm.%)	Average Bias Zero (ppm.%)	Initial Bias Span (ppm.%)	Final Bias Span (ppm.%)	Average Bias Span (ppm.%)	Bias Adjusted Conc. (ppm.%)
NOx	9.6	11.4	0.1	0.0	0.1	11.2	11.3	11.3	<b>9.7</b>
O2	15.5	12.1	-0.1	-0.1	-0.1	12.1	12.1	12.1	<b>15.4</b>
CO	23.8	19.6	-0.2	0.4	0.1	19.4	19.9	19.7	<b>23.7</b>

### Run No. 3

Parameter	Measured Conc. (ppm,%)	Reference Span gas (ppm.%)	Initial Bias Zero (ppm.%)	Final Bias Zero (ppm.%)	Average Bias Zero (ppm.%)	Initial Bias Span (ppm.%)	Final Bias Span (ppm.%)	Average Bias Span (ppm.%)	Bias Adjusted Conc. (ppm.%)
NOx	9.8	11.4	0.0	0.0	0.0	11.3	11.4	11.4	<b>9.8</b>
O2	15.5	12.1	-0.1	-0.1	-0.1	12.1	12.0	12.1	<b>15.5</b>
CO	23.8	19.6	0.4	-0.3	0.1	19.9	19.9	19.9	<b>23.5</b>

## RATA Bias Adjustment

Facility: New Indy  
 Source: Turbine  
 Date: 03/25/14

### Run No. 1

Parameter	Measured Conc. (ppm,%)	Reference Span gas (ppm.%)	Initial Zero (ppm.%)	Final Zero (ppm.%)	Average Zero (ppm.%)	Initial Span (ppm.%)	Final Span (ppm.%)	Average Span (ppm.%)	Adjusted Conc. (ppm.%)
NOx	10.1	11.4	-0.1	0.1	0.0	11.1	11.2	11.2	<b>10.3</b>
O2	15.5	12.1	-0.2	-0.1	-0.1	12.1	12.1	12.1	<b>15.5</b>
CO	25.9	19.6	0.0	-0.2	-0.1	19.9	19.4	19.7	<b>25.8</b>

### Run No. 2

Parameter	Measured Conc. (ppm,%)	Reference Span gas (ppm.%)	Initial Zero (ppm.%)	Final Zero (ppm.%)	Average Zero (ppm.%)	Initial Span (ppm.%)	Final Span (ppm.%)	Average Span (ppm.%)	Adjusted Conc. (ppm.%)
NOx	10.5	11.4	-0.1	0.1	0.0	11.1	11.2	11.2	<b>10.7</b>
O2	15.5	12.1	-0.2	-0.1	-0.1	12.1	12.1	12.1	<b>15.5</b>
CO	25.7	19.6	0.0	-0.2	-0.1	19.9	19.4	19.7	<b>25.6</b>

### Run No. 3

Parameter	Measured Conc. (ppm,%)	Reference Span gas (ppm.%)	Initial Zero (ppm.%)	Final Zero (ppm.%)	Average Zero (ppm.%)	Initial Span (ppm.%)	Final Span (ppm.%)	Average Span (ppm.%)	Adjusted Conc. (ppm.%)
NOx	10.6	11.4	0.1	0.1	0.1	11.1	11.2	11.2	<b>10.9</b>
O2	15.5	12.1	-0.1	-0.1	-0.1	12.1	12.1	12.1	<b>15.5</b>
CO	25.4	19.6	-0.2	-0.2	-0.2	19.9	19.4	19.7	<b>25.3</b>

### Run No. 4

Parameter	Measured Conc. (ppm,%)	Reference Span gas (ppm.%)	Initial Zero (ppm.%)	Final Zero (ppm.%)	Average Zero (ppm.%)	Initial Span (ppm.%)	Final Span (ppm.%)	Average Span (ppm.%)	Adjusted Conc. (ppm.%)
NOx	9.4	11.4	0.1	0.0	0.1	11.2	11.3	11.2	<b>9.5</b>
O2	15.5	12.1	-0.1	-0.1	-0.1	12.1	12.1	12.1	<b>15.4</b>
CO	24.2	19.6	-0.2	0.4	0.1	19.4	19.9	19.6	<b>24.2</b>

### Run No. 5

Parameter	Measured Conc. (ppm,%)	Reference Span gas (ppm.%)	Initial Zero (ppm.%)	Final Zero (ppm.%)	Average Zero (ppm.%)	Initial Span (ppm.%)	Final Span (ppm.%)	Average Span (ppm.%)	Adjusted Conc. (ppm.%)
NOx	9.3	11.4	0.0	0.0	0.0	11.2	11.3	11.2	<b>9.4</b>
O2	15.5	12.1	-0.1	-0.1	-0.1	12.1	12.1	12.1	<b>15.49</b>
CO	23.9	19.6	0.4	0.4	0.4	19.4	19.9	19.6	<b>23.9</b>

## RATA Bias Adjustmen.

Facility: New Indy  
 Source: Turbine  
 Date: 03/25/14

### Run No. 6

Parameter	Measured Conc. (ppm,%)	Reference Span gas (ppm.%)	Initial Zero (ppm.%)	Final Zero (ppm.%)	Average Zero (ppm.%)	Initial Span (ppm.%)	Final Span (ppm.%)	Average Span (ppm.%)	Adjusted Conc. (ppm.%)
NOx	10.1	11.4	0.0	0.0	0.0	11.2	11.3	11.2	<b>10.3</b>
O2	15.4	12.1	-0.1	-0.1	-0.1	12.1	12.1	12.1	<b>15.4</b>
CO	23.2	19.6	0.4	0.4	0.4	19.4	19.9	19.6	<b>23.3</b>

### Run No. 7

Parameter	Measured Conc. (ppm,%)	Reference Span gas (ppm.%)	Initial Zero (ppm.%)	Final Zero (ppm.%)	Average Zero (ppm.%)	Initial Span (ppm.%)	Final Span (ppm.%)	Average Span (ppm.%)	Adjusted Conc. (ppm.%)
NOx	9.5	11.4	0.0	0.0	0.0	11.3	11.4	11.4	<b>9.6</b>
O2	15.5	12.1	-0.1	-0.1	-0.1	12.1	12.0	12.1	<b>15.5</b>
CO	24.3	19.6	0.4	-0.3	0.1	19.9	19.5	19.7	<b>24.2</b>

### Run No. 8

Parameter	Measured Conc. (ppm,%)	Reference Span gas (ppm.%)	Initial Zero (ppm.%)	Final Zero (ppm.%)	Average Zero (ppm.%)	Initial Span (ppm.%)	Final Span (ppm.%)	Average Span (ppm.%)	Adjusted Conc. (ppm.%)
NOx	9.5	11.4	0.0	0.0	0.0	11.3	11.4	11.4	<b>9.5</b>
O2	15.5	12.1	-0.1	-0.1	-0.1	12.1	12.0	12.1	<b>15.5</b>
CO	24.2	19.6	-0.3	-0.3	-0.3	19.9	19.5	19.7	<b>24.1</b>

### Run No. 9

Parameter	Measured Conc. (ppm,%)	Reference Span gas (ppm.%)	Initial Zero (ppm.%)	Final Zero (ppm.%)	Average Zero (ppm.%)	Initial Span (ppm.%)	Final Span (ppm.%)	Average Span (ppm.%)	Adjusted Conc. (ppm.%)
NOx	10.3	11.4	0.0	0.0	0.0	11.3	11.4	11.4	<b>10.3</b>
O2	15.4	12.1	-0.1	-0.1	-0.1	12.1	12.0	12.1	<b>15.4</b>
CO	23.0	19.6	-0.3	-0.3	-0.3	19.9	19.5	19.7	<b>22.9</b>

**FIELD DATA & CALCULATIONS SUMMARY**

Client: **International Paper**  
Site: **Oxnard**  
Unit: **Turbine**

Date: **3/25/2014**  
Type: **T std = 68 °F**  
Run: **1-NH3**

<b>Vm</b>	Metered Sample Gas Volume	<b>55.246</b>	<b>dcf</b>		
<b>Lp</b>	Avg. Leak Rate	<b>0.000</b>	<b>cf</b>		
<b>Vn</b>	Leak Corrected Sample Gas Volume	<b>55.246</b>	<b>dcf</b>		
<b>Y</b>	Dry Gas Meter Calibration Factor	<b>1.0094</b>			
<b>Pbar</b>	Barometric Pressure	<b>30.11</b>	<b>in. Hg</b>		
<b>del H</b>	Dry Gas Meter Press. Differential, Average	<b>2.0</b>	<b>in. H2O</b>		
<b>Tm</b>	Dry Gas Meter Temperature, Average	<b>70.1</b>	<b>°F</b>	<b>530.1</b>	<b>°R</b>
<b>Vm(std)</b>	Sample Gas Volume	<b>56.1675</b>	<b>dscf</b>		
<b>O2</b>	Oxygen, Dry	<b>15.5</b>	<b>%</b>		
<b>Theta</b>	Sampling Time	<b>96</b>	<b>min.</b>		

**CALCULATED EMISSION RESULTS**

Client: **International Paper**  
Site: **Oxnard**  
Unit: **Turbine**

Date: **3/25/2014**  
Type: **T std = 68 °F**  
Run: **1-NH3**

**AMMONIA AS NH3**

<b>Ws</b>	Ammonia Weight	<b>0.00329</b>	<b>g</b>
<b>Cs</b>	Ammonia Emissions	<b>0.00090</b>	<b>grain/dscf</b>
	Ammonia Concentration	<b>2.9</b>	<b>ppmv</b>
	Ammonia Concentration	<b>3.1</b>	<b>ppmv @ 15% O2</b>

**FIELD DATA & CALCULATIONS SUMMARY**

Client: **New Indy**  
 Site: **Oxnard**  
 Unit: **Turbine**

Date: **3/25/2014**  
 Type: **T std = 68 °F**  
 Run: **2-NH3**

<b>Vm</b>	Metered Sample Gas Volume	<b>54.166</b>	<b>dcf</b>	
<b>Lp</b>	Avg. Leak Rate	0.002	cf	
<b>Vn</b>	Leak Corrected Sample Gas Volume	54.166	dcf	
<b>Y</b>	Dry Gas Meter Calibration Factor	<b>1.0094</b>		
<b>Pbar</b>	Barometric Pressure	<b>30.15</b>	<b>in. Hg</b>	
<b>del H</b>	Dry Gas Meter Press. Differential, Average	<b>2.0</b>	<b>in. H2O</b>	
<b>Tm</b>	Dry Gas Meter Temperature, Average	74.9	°F	<b>534.9 °R</b>
<b>Vm(std)</b>	Sample Gas Volume	<b>54.6483</b>	<b>dscf</b>	
<b>O2</b>	Oxygen, Dry	<b>15.4</b>	<b>%</b>	
<b>Theta</b>	Sampling Time	<b>96</b>	<b>min.</b>	

**CALCULATED EMISSION RESULTS**

Client: **New Indy**  
 Site: **Oxnard**  
 Unit: **Turbine**

Date: **3/25/2014**  
 Type: **T std = 68 °F**  
 Run: **2-NH3**

**AMMONIA AS NH3**

<b>Ws</b>	Ammonia Weight	<b>0.00348</b>	<b>g</b>
<b>Cs</b>	Ammonia Emissions	<b>0.00098</b>	<b>grain/dscf</b>
	Ammonia Concentration	<b>3.1</b>	<b>ppmv</b>
	Ammonia Concentration	<b>3.4</b>	<b>ppmv @ 15% O2</b>



**"F" FACTOR EXHAUST GAS FLOWRATE CALCULATION**

Client : New Indy  
 Site : Oxnard  
 Unit : Turbine

Date : 3/25/2014  
 Job# : 23022  
 Lab# : 214-028

"F" Factor, Q(std):  dscf/MMBTU

Standard Temperature, T std:  deg. F

	Run 1	Run 2	Run 3
Oxygen, % (avg)	15.5	15.4	15.5
Fuel Usage, dscfm (avg)	4403.6	4450.4	4421.3
MMBTU/min	4.6238	4.6729	4.6424
Flowrate ("F" Factor), dscfm	154671	155356	156507

*formulae:*

$$\text{MMBTU/min} = (\text{Fuel Usage} * 1050 \text{ Btu/ft}^3) / 10^6$$

$$\text{Flowrate ("F" Factor)} = \text{"F" Factor} * \text{MMBTU/min} * (20.0 / (20.9 - O_2))$$

Client: New Indy  
 Site: Oxnard  
 Unit: Turbine

 Analysis Date: 3/25/2014  
 Lab: 214-028

Run#:	Sample Volume (ml)	Aliquot Volume (ml)	Reading ug/ml	Dilution
<u>R1</u>	<u>610</u>	<u>49</u>	<u>5.5</u>	<u>1</u>
	Total NH3 mg/sample		<u>3.29</u>	
<u>R-2</u>	<u>600</u>	<u>49</u>	<u>5.9</u>	<u>1</u>
	Total NH3 mg/sample		<u>3.48</u>	
<u>R-3</u>	<u>680</u>	<u>49</u>	<u>5.7</u>	<u>1</u>
	Total NH3 mg/sample		<u>3.83</u>	
<u>R1 (Duplicate)</u>	<u>610</u>	<u>49</u>	<u>5.5</u>	<u>1</u>
	Total NH3 mg/sample		<u>3.31</u>	
<u>0.1 N HCL Blank</u>	<u>49</u>	<u>49</u>	<u>0.09</u>	<u>1</u>
<u>R-2</u>	<u>600</u>	<u>48</u>	<u>6.9</u>	<u>1</u>
Spike (1 ug/ml)	Theoretical Value =		<u>6.9</u>	(ug/ml)
% Recovery			<u>99.7</u>	%
Analyst:	<u>Wesley Hart</u>			



AMM TESTING

TESTING

A Division of Justice & Associates

BAAQMD METHOD ST-1B  
AMMONIA

Client: NEW INDY  
Site: OXNARD  
Unit: TURBINE

Date: 3/25/14  
Lab: 214-028

Run#:	Sample Volume (ml)	Aliquot Volume (ml)	Reading ug/ml	Dilution
<u>1</u>	<u>610</u>	<u>49</u>	<u>5.48</u>	<u>1</u>
	Sample Volume (ml)	Aliquot Volume (ml)	Reading ug/ml	
Run#: <u>2</u>	<u>600</u>	<u>49</u>	<u>5.9</u>	<u>1</u>
	Sample Volume (ml)	Aliquot Volume (ml)	Reading ug/ml	
Run#: <u>3</u>	<u>680</u>	<u>49</u>	<u>5.72</u>	<u>1</u>
	Sample Volume (ml)	Aliquot Volume (ml)	Reading ug/ml	
Run #: <u>1</u> Duplicate	<u>610</u>	<u>49</u>	<u>5.52</u>	<u>1</u>
	Sample Volume (ml)	Aliquot Volume (ml)	Reading ug/ml	
0.1 N HCl Blank	<u>49</u>	<u>49</u>	<u>.092</u>	<u>1</u>
	Sample Volume (ml)	Aliquot Volume (ml)	Reading ug/ml	
Run #: <u>2</u>	<u>600</u>	<u>48</u>	<u>6.88</u>	<u>1</u>
	Sample Volume (ml)	Aliquot Volume (ml)	Reading ug/ml	
Spike (1 ug/ml)	Theoretical = <u>6.9</u>	(ug/ml)		
Analyst: <u>WestHart WestH</u>		Date: <u>3-31-14</u>		

**EMISSIONS TEST - CARB 100**

Date: 3/25/2014

**\*\* Test Information \*\***

Client: New Indy  
 County: Ventura  
 Site(s): Oxnard  
 Unit(s): Turbine

**\*\* Personnel \*\***

AIRx: RY, TP  
 Client: RL  
 APCD: LO

Run Length:	96/32	Inlet ( )	Outlet (X)	Fuel ( )	HC ( )	
No. Points:	96/32	S.T. (X)	E.I. ( )	Data ( )	H2S ( )	NH3 ( )
	Time	Baro.	Temp.		Weather.	
Arrive:	6:00 AM	30.11	60		Clear	
Depart:	2:40 PM	30.15	65		Clear	

**\*\* Instrument Information \*\***

Instrument	"On"	Unit#	Make/Model
O2:	1	9	Servomex
CO:	1	1	API 300EM
NOx:	1	1	API 200EH

Recorder: Soltech 10 cm/hr

**\*\* Calibration Information \*\***

	Units	Zero	Span	Range	Gas Cyl.#	Gas Flow
O2:	%	0	12.1	25	AAL20083	0.8
O2:	%	0	20.0	25	CC259847	0.8
CO:	ppmv	0	19.6	50	CC101401	1
CO:	ppmv	0	40.7	50	ALM022010	1
NOx:	ppmv	0	11.4	25	CC10018	1
NOx:	ppmv	0	19.8	25	AAL2002	1
NO2:	ppmv	0	19.2	25	AAL2432	1

**\*\* Recorder Information \*\***

	Units	Chanl.	Pen Type	Color
O2:	%	2	Cont.	Green
CO:	ppmv	1	Cont.	Purple
NOx:	ppmv	3	Cont.	Brown

CLIENT:	New Indy	JOB#	214-028
PLANT:	Oxnard, CA	RUN#	RATA 1
DATE:	3/25/2014	UNIT ID:	Turbine
ENGINEER:	RY-TP	RUN START:	8:35 AM

NOx, ppm	CO, ppm	O2, %	NOx, ppm @ 15% O2	CO, ppm @ 15% O2	TIME
9.3	24.7	15.4	10.0	26.6	8:35:00
9.5	25.2	15.4	10.3	27.2	8:36:00
9.6	25.4	15.4	10.4	27.5	8:37:00
9.8	25.6	15.4	10.5	27.6	8:38:00
10.0	25.5	15.4	10.8	27.5	8:39:00
10.1	25.6	15.5	11.0	27.7	8:40:00
9.9	25.8	15.5	10.7	27.9	8:41:00
9.8	25.7	15.5	10.6	27.9	8:42:00
10.0	25.8	15.4	10.8	27.9	8:43:00
10.2	25.9	15.5	11.0	28.1	8:44:00
10.1	26.0	15.5	10.9	28.2	8:45:00
10.0	26.0	15.5	10.9	28.3	8:46:00
10.0	26.1	15.5	10.9	28.5	8:47:00
10.1	26.1	15.5	11.0	28.4	8:48:00
10.2	26.1	15.5	11.2	28.4	8:49:00
10.2	26.0	15.5	11.1	28.4	8:50:00
10.2	26.1	15.5	11.1	28.5	8:51:00
10.3	26.1	15.5	11.3	28.5	8:52:00
10.3	26.0	15.5	11.2	28.5	8:53:00
10.3	25.9	15.5	11.2	28.3	8:54:00
10.5	26.0	15.5	11.5	28.4	8:55:00
10.5	26.0	15.5	11.5	28.5	8:56:00
10.3	26.0	15.5	11.3	28.4	8:57:00
10.2	26.0	15.5	11.2	28.4	8:58:00
10.3	26.0	15.5	11.2	28.5	8:59:00
10.3	26.1	15.5	11.3	28.6	9:00:00
10.3	26.1	15.5	11.3	28.6	9:01:00
10.2	26.2	15.5	11.2	28.7	9:02:00
10.2	26.2	15.5	11.2	28.8	9:03:00
10.2	26.2	15.5	11.2	28.8	9:04:00
10.3	26.1	15.5	11.4	28.7	9:05:00
10.4	26.1	15.5	11.5	28.7	9:06:00
10.3	26.1	15.5	11.4	28.8	9:07:00
<b>10.1</b>	<b>25.9</b>	<b>15.5</b>	<b>11.0</b>	<b>28.2</b>	<b>Averages</b>

CLIENT:	New Indy	JOB#	214-028
PLANT:	Oxnard, CA	RUN#	RATA 2
DATE:	3/25/2014	UNIT ID:	Turbine
ENGINEER:	RY-TP	RUN START:	9:07 AM

NOx, ppm	CO, ppm	O2, %	NOx, ppm @ 15% O2	CO, ppm @ 15% O2	TIME
10.3	26.1	15.5	11.4	28.8	9:07:00
10.4	26.1	15.5	11.4	28.8	9:08:00
10.5	26.0	15.5	11.5	28.6	9:09:00
10.5	26.0	15.5	11.5	28.6	9:10:00
10.5	26.0	15.5	11.5	28.5	9:11:00
10.6	26.0	15.5	11.6	28.5	9:12:00
10.4	26.1	15.5	11.4	28.7	9:13:00
10.3	26.0	15.5	11.4	28.6	9:14:00
10.4	25.9	15.5	11.4	28.5	9:15:00
10.6	25.9	15.5	11.6	28.5	9:16:00
10.5	25.9	15.5	11.5	28.4	9:17:00
10.6	25.9	15.5	11.6	28.5	9:18:00
10.7	25.9	15.5	11.7	28.5	9:19:00
10.7	25.9	15.5	11.7	28.5	9:20:00
10.6	25.9	15.5	11.6	28.4	9:21:00
10.4	25.8	15.5	11.4	28.3	9:22:00
10.3	25.8	15.5	11.3	28.3	9:23:00
10.3	25.6	15.5	11.3	28.0	9:24:00
10.6	25.5	15.5	11.6	27.8	9:25:00
10.6	25.3	15.5	11.6	27.6	9:26:00
10.4	25.5	15.5	11.3	27.7	9:27:00
10.4	25.3	15.5	11.3	27.6	9:28:00
10.5	25.3	15.5	11.4	27.5	9:29:00
10.6	25.2	15.5	11.5	27.4	9:30:00
10.7	25.1	15.5	11.6	27.2	9:31:00
10.7	25.1	15.5	11.6	27.3	9:32:00
10.5	25.3	15.5	11.4	27.5	9:33:00
10.3	25.4	15.5	11.2	27.7	9:34:00
10.3	25.4	15.5	11.2	27.7	9:35:00
10.5	25.5	15.5	11.4	27.8	9:36:00
10.7	25.4	15.5	11.7	27.7	9:37:00
10.7	25.6	15.5	11.7	27.9	9:38:00
10.6	25.7	15.5	11.5	28.1	9:39:00
10.6	25.7	15.5	11.5	28.1	9:40:00
<b>10.5</b>	<b>25.7</b>	<b>15.5</b>	<b>11.5</b>	<b>28.1</b>	<b>Averages</b>

CLIENT:  
PLANT:  
DATE:  
ENGINEER:

New Indy  
Oxnard, CA  
3/25/2014  
RY-TP

JOB#  
RUN#  
UNIT ID:  
RUN START:

214-028  
RATA 3  
Turbine  
9:41 AM

NOx, ppm	CO, ppm	O2, %	NOx, ppm @ 15% O2	CO, ppm @ 15% O2	Time
10.6	25.7	15.5	11.5	28.1	9:39:00
10.6	25.7	15.5	11.5	28.1	9:40:00
10.5	25.7	15.5	11.5	28.1	9:41:00
10.3	25.7	15.5	11.3	28.1	9:42:00
10.5	25.6	15.5	11.5	28.0	9:43:00
10.7	25.6	15.5	11.8	28.0	9:44:00
10.9	25.6	15.5	11.9	28.0	9:45:00
10.9	25.6	15.5	11.9	28.0	9:46:00
10.8	25.4	15.5	11.8	27.7	9:47:00
10.8	25.1	15.5	11.8	27.4	9:48:00
10.6	25.0	15.5	11.6	27.2	9:49:00
10.4	25.0	15.5	11.3	27.2	9:50:00
10.4	25.1	15.5	11.3	27.3	9:51:00
10.6	25.0	15.5	11.6	27.1	9:52:00
10.6	25.0	15.5	11.6	27.3	9:53:00
10.5	25.3	15.5	11.5	27.6	9:54:00
10.6	25.4	15.5	11.6	27.7	9:55:00
10.4	25.4	15.5	11.4	27.8	9:56:00
10.4	25.4	15.5	11.4	27.8	9:57:00
10.7	25.3	15.5	11.7	27.6	9:58:00
10.8	25.2	15.5	11.8	27.5	9:59:00
10.8	25.4	15.5	11.8	27.8	10:00:00
10.8	25.6	15.5	11.9	28.1	10:01:00
10.8	25.6	15.5	11.9	28.1	10:02:00
10.6	25.6	15.5	11.6	28.1	10:03:00
10.5	25.6	15.5	11.6	28.1	10:04:00
10.6	25.5	15.5	11.7	28.1	10:05:00
10.7	25.5	15.5	11.7	28.1	10:06:00
10.7	25.7	15.5	11.7	28.2	10:07:00
10.6	25.6	15.5	11.7	28.1	10:08:00
10.6	25.5	15.5	11.6	28.0	10:09:00
10.6	25.5	15.5	11.7	28.0	10:10:00
10.6	25.3	15.5	11.6	27.7	10:11:00
<b>10.6</b>	<b>25.4</b>	<b>15.5</b>	<b>11.6</b>	<b>27.8</b>	<b>Averages</b>

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10.5	22.8	15.4	11.2	24.5	12:04:00
10.4	22.9	15.4	11.1	24.7	12:05:00
10.2	23.0	15.4	11.0	24.8	12:06:00
10.2	23.2	15.4	11.0	25.0	12:07:00
10.2	23.3	15.4	11.0	25.1	12:08:00
10.2	23.4	15.4	11.0	25.2	12:09:00
10.2	23.5	15.4	10.9	25.3	12:10:00
10.3	23.5	15.4	11.1	25.4	12:11:00
10.3	23.6	15.4	11.1	25.5	12:12:00
10.3	23.6	15.5	11.1	25.6	12:13:00
10.2	23.7	15.5	11.1	25.7	12:14:00
10.3	23.8	15.5	11.2	25.8	12:15:00
10.4	23.8	15.5	11.3	25.8	12:16:00
<b>10.1</b>	<b>23.2</b>	<b>15.4</b>	<b>10.9</b>	<b>25.1</b>	<b>Averages</b>

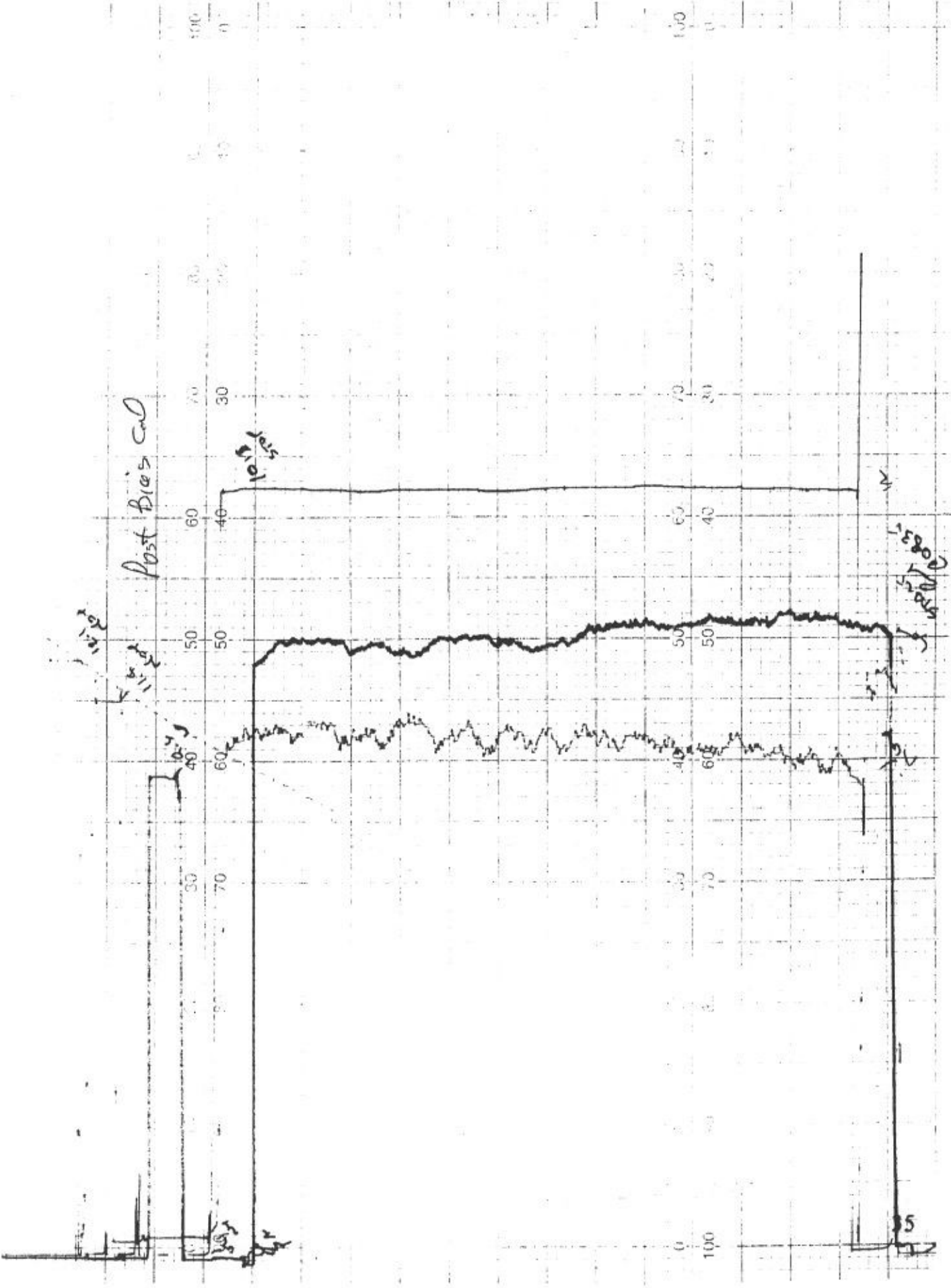
CLIENT:	New Indy	JOB#	214-028
PLANT:	Oxnard, CA	RUN#	RATA 7
DATE:	3/25/2014	UNIT ID:	Turbine
ENGINEER:	RY-TP	RUN START:	12:45 PM

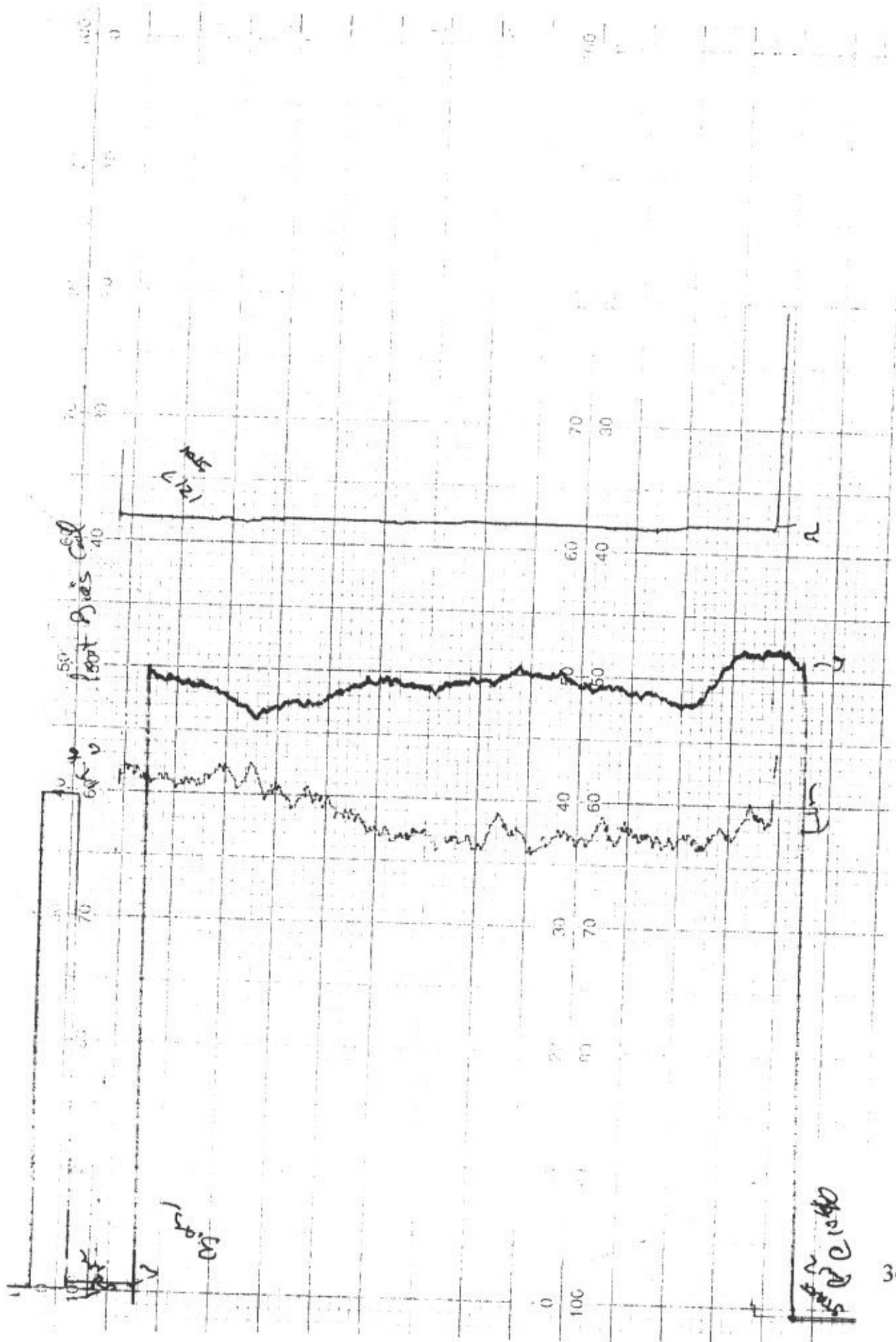
NOx, ppm	CO, ppm	O2, %	NOx, ppm @ 15% O2	CO, ppm @ 15% O2	TIME
9.7	24.5	15.5	10.7	26.9	12:45:00
9.6	24.3	15.5	10.5	26.6	12:46:00
9.8	24.1	15.5	10.8	26.5	12:47:00
10.0	24.1	15.5	10.8	26.2	12:48:00
9.7	24.0	15.5	10.6	26.1	12:49:00
9.6	23.9	15.5	10.5	26.1	12:50:00
9.6	24.0	15.5	10.4	26.2	12:51:00
9.7	23.9	15.5	10.6	26.2	12:52:00
9.8	23.7	15.5	10.7	25.9	12:53:00
9.7	23.8	15.5	10.5	25.9	12:54:00
9.6	24.0	15.5	10.5	26.0	12:55:00
9.6	24.1	15.5	10.5	26.1	12:56:00
9.7	24.1	15.5	10.5	26.2	12:57:00
9.6	24.3	15.5	10.5	26.4	12:58:00
9.6	24.3	15.5	10.4	26.4	12:59:00
9.5	24.3	15.5	10.4	26.6	13:00:00
9.4	24.3	15.5	10.3	26.6	13:01:00
9.3	24.3	15.5	10.2	26.6	13:02:00
9.4	24.4	15.5	10.2	26.7	13:03:00
9.5	24.4	15.5	10.4	26.6	13:04:00
9.6	24.5	15.5	10.5	26.7	13:05:00
9.5	24.6	15.5	10.4	26.8	13:06:00
9.5	24.7	15.5	10.3	27.0	13:07:00
9.3	24.7	15.5	10.2	27.0	13:08:00
9.3	24.5	15.5	10.2	26.8	13:09:00
9.5	24.5	15.5	10.4	26.8	13:10:00
9.4	24.6	15.5	10.3	26.9	13:11:00
9.4	24.4	15.5	10.3	26.7	13:12:00
9.4	24.3	15.5	10.3	26.6	13:13:00
9.5	24.4	15.5	10.4	26.6	13:14:00
9.6	24.4	15.5	10.4	26.6	13:15:00
9.4	24.5	15.5	10.2	26.7	13:16:00
9.3	24.4	15.5	10.1	26.6	13:17:00
<b>9.5</b>	<b>24.3</b>	<b>15.5</b>	<b>10.4</b>	<b>26.5</b>	<b>Averages</b>





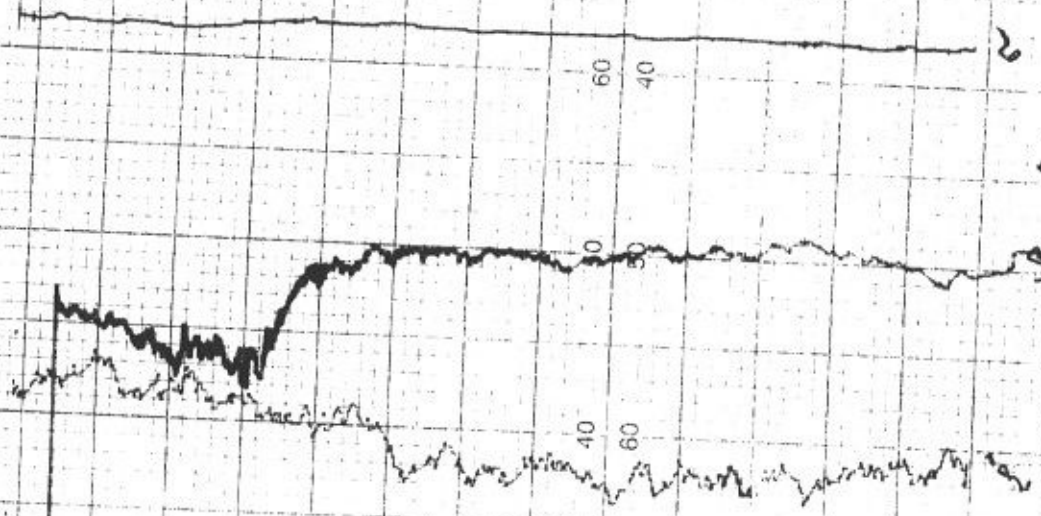






Post-Bris Cad  
STOP 2121

11/12  
11/12



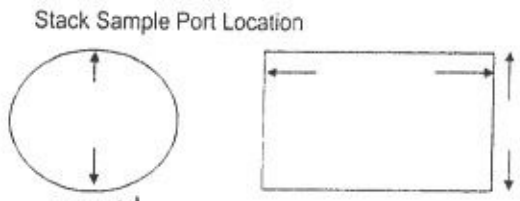
CR  
11/12

Post-Bris Cad R2

11/12

Plant: <u>New Indy</u>	Amb. Temp: <u>60</u>	Nozzel: <u>3/8"</u>
Location: <u>Oxnard</u>	Pbar: <u>30.11</u>	Prob Heat: _____
Unit: <u>Turbine</u>	Pitot: <u>-</u>	Wind Vel: <u>Cal</u>
Date: <u>3/25/14</u>	Pyro: <u>-</u>	Static Press: <u>-</u>
Run #: <u>1 - MHz</u>	Mag Δ P: <u>-</u>	O2: _____
Cold Box: <u>3</u>	Mag Δ H: <u>muw</u>	CO2: _____
Meter #: <u>6</u>	% H2O: <u>-</u>	Engineer: <u>RY</u>
Meter Factor: <u>1.0094</u>	Box Heat: <u>-</u>	Technician: <u>TP</u>

Stack Dia.: \_\_\_\_\_  
 "A": \_\_\_\_\_  
 "B": \_\_\_\_\_  
 Port Size: \_\_\_\_\_  
 Offset: \_\_\_\_\_  
 M/F: \_\_\_\_\_



Imp.	Gross	Tare	Total
1		620.0	
2		598.7	
3		476.0	
4		672.5	

START TIME: 9:35 END TIME: 10:11

"K" FACTOR: \_\_\_\_\_

Filter 1: \_\_\_\_\_

Filter 2: \_\_\_\_\_

Point No.	Traverse Distance	Time Minutes	Stack °F	Δ P	√Δ P	Dry Gas Meter Volume	Δ H In H2O	Inlet °F	Outlet °F	Impinger Exit °F	Meter Vacuum	Filter Temp. °F	Cyl. Flow
1		0				577.15	2.0	65	64				
2	43	8				581.5	2.0	67	63				
3	51	16				586.4	2.0	71	64				
4	59	24				590.5	2.0	73	64				
5	9:07	32				596.0	2.0	76	64				
6	15	40				609.0	2.0	76	66				
7	23	48				604.7	2.0	76	66				
8	31	56				609.3	2.0	77	67				
9	39	64				613.9	2.0	77	68				
10	47	72				620.5	2.0	77	68				
11	55	80				624.3	2.0	77	69				
12	10:03	88				627.9	2.0	77	69				
	11	96				632.403							

Average: \_\_\_\_\_

Leak Checks: Pitots

Sample Train Leak Check

Pre	Top	Bottom
ΔP		

Post	Top	Bottom
ΔP		

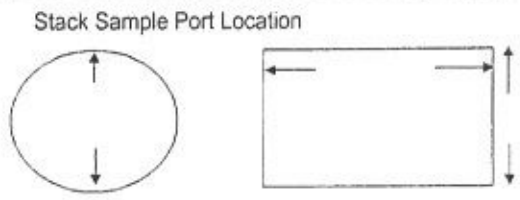
CFM: <u>401</u>	In. HG: <u>20</u>
CFM: <u>6</u>	In. HG: <u>12</u>

Amor  
1.1NCL



Plant: <u>New Indy</u>	Amb. Temp: <u>62</u>	Nozzel: <u>3/8"</u>
Location: <u>8th Ave</u>	Pbar: <u>20.15</u>	Prob Heat: _____
Unit: <u>Turbine</u>	Pitot: _____	Wind Vel: <u>Calcu</u>
Date: <u>5/25/14</u>	Pyro: _____	Static Press: _____
Run #: _____	Mag Δ P: _____	O2: _____
Cold Box: <u>5</u>	Mag Δ H: <u>mano</u>	CO2: _____
Meter #: <u>6</u>	% H2O: _____	Engineer: _____
Meter Factor: <u>1.0094</u>	Box Heat: _____	Technician: <u>TP</u>

Stack Dia.: \_\_\_\_\_  
 "A": \_\_\_\_\_  
 "B": \_\_\_\_\_  
 Port Size: \_\_\_\_\_  
 Offset: \_\_\_\_\_  
 M / F: \_\_\_\_\_



Imp.	Gross	Tare	Total
1		570.6	
2		619.1	
3		454.1	
4		749.3	

START TIME: 10:40 END TIME: 12:16 "K" FACTOR: \_\_\_\_\_ Filter 1: \_\_\_\_\_ Filter 2: \_\_\_\_\_

Point No.	Traverse Distance	Time Minutes	Stack °F	Δ P	√Δ P	Dry Gas Meter Volume	Δ H In H2O	Inlet °F	Outlet °F	Impinger Exit °F	Meter Vacuum	Filter Temp °F	Cyl. Flow
1		0				632.436	2.0	72	70		3		
2		48				638.5	2.0	79	69		3		
3		56				642.5	2.0	80	69		3		
4		11:04				647.5	2.0	80	70		3		
5		12				651.7	2.0	80	70		3		
6		20				656.2	2.0	80	71		3		
7		28				663.2	2.0	80	71		3		
8		36				665.7	2.0	80	71		3		
9		44				670.7	2.0	80	71		3		
10		52				675.5	2.0	80	72		3		
11		12:00				679.1	2.0	80	72		3		
12		12:08				683.7	2.0	79	72		3		
		16				687.602							

Average: \_\_\_\_\_

Leak Checks: Pitots

Sample Train Leak Check

Pre	Top	Bottom
ΔP		

Post	Top	Bottom
ΔP		

CFM:	<u>0</u>	In. HG:	<u>17</u>
CFM:	<u>0.2</u>	In. HG:	<u>5</u>

9/5/21

Plant : <u>Man Tully</u>	Amb. Temp : <u>65</u>	Nozzel : <u>3/8</u>
Location : <u>Oxapump</u>	Pbar : <u>30.15</u>	Prob Heat : <u>-</u>
Unit : <u>Turbine</u>	Pitot : <u>-</u>	Wind Vel. : <u>-</u>
Date : <u>9/5/21</u>	Pyro : <u>-</u>	Static Press. : <u>-</u>
Run # : <u>3-NH3</u>	Mag Δ P : <u>-</u>	O2 : <u>-</u>
Cold Box : <u>3</u>	Mag Δ H : <u>manu</u>	CO2 : <u>-</u>
Meter # : <u>Co</u>	% H2O : <u>-</u>	Engineer : <u>RY</u>
Meter Factor : <u>1.0094</u>	Box Heat : <u>-</u>	Technician : <u>JP</u>

Stack Dia : \_\_\_\_\_  
 "A" : \_\_\_\_\_  
 "B" : \_\_\_\_\_  
 Port Size : \_\_\_\_\_  
 Offset : \_\_\_\_\_  
 M / F : \_\_\_\_\_

Stack Sample Port Location



Imp.	Gross	Tare	Total
1			
2			
3			
4			

Filter 1 : \_\_\_\_\_  
 Filter 2 : \_\_\_\_\_

START TIME: 12:45 END TIME: 2:21 "K" FACTOR: \_\_\_\_\_

Point No.	Traverse Distance	Time Minutes	Stack "F"	Δ P	√Δ P	Dry Gas Meter Volume	Δ H In H2O	Inlet ° F	Outlet ° F	Impinger Exit ° F	Meter Vacuum	Filter Temp. ° F	Cyl. Flow
1		0				689.308	2.0	75	72		6		
2	53	8				694.3	2.0	76	72		6		
3	1:01	16				699.0	2.0	79	72		6		
4	09	24				703.0	2.0	80	72		6		
5	17	32				708.7	2.0	80	72		6		
6	25	40				712.7	2.0	80	72		6		
7	33	48				717.3	2.0	80	73		6		
8	41	56				722.7	2.0	80	73		6		
9	49	64				727.9	2.0	80	73		6		
10	57	72				730.0	2.0	80	74		6		
11	2:05	80				735.5	2.0	80	74		6		
12	73	88				740.3	2.0	80	74		6		
	2:1	96				744.508							

Average: \_\_\_\_\_

Leak Checks : Pitots

Pre	Top	Bottom
ΔP		

Post	Top	Bottom
ΔP		

Sample Train Leak Check

CFM :	<u>.010</u>	In. HG :	<u>16</u>
CFM :	<u>0</u>	In. HG :	<u>12</u>



New-Indy Oxnard, LLC  
ROSEMOUNT CEMS SOURCE TEST  
March 25, 2014

3/25/2014 8:35 3252014.07 1 m

Run 1

MS_NOX_PPM	Stack CO	Stack O2	Duct Burner Gas Flow	Turbine Gas Flow	Steam Injection	Ammonia Injection	Turbine Load
10.23	RS_B11MCC111CCO	RS_B11MCC111O2	DGCASFLW_A	GTCASFLW	921-2015.WQ	931FR1173.WV	931-2015.DHWATT
25-Mar-14 08:35:00	29.16	15.54	10.47	256.10	2.16	19.79	25-Mar-14 08:35:00
25-Mar-14 08:36:00	29.16	15.54	10.19	256.10	2.14	19.56	25-Mar-14 08:36:00
25-Mar-14 08:37:00	29.16	15.54	9.90	256.10	2.19	20.08	25-Mar-14 08:37:00
25-Mar-14 08:38:00	29.17	15.54	9.62	256.10	2.16	20.08	25-Mar-14 08:38:00
25-Mar-14 08:39:00	29.24	15.54	9.35	256.10	2.19	20.26	25-Mar-14 08:39:00
25-Mar-14 08:40:00	29.33	15.54	9.09	256.10	2.17	19.86	25-Mar-14 08:40:00
25-Mar-14 08:41:00	29.67	15.54	8.89	256.10	2.15	20.57	25-Mar-14 08:41:00
25-Mar-14 08:42:00	30.23	15.54	8.21	256.10	2.15	20.34	25-Mar-14 08:42:00
25-Mar-14 08:43:00	29.96	15.54	7.89	256.10	2.18	20.34	25-Mar-14 08:43:00
25-Mar-14 08:44:00	29.54	15.54	7.64	256.10	2.18	20.14	25-Mar-14 08:44:00
25-Mar-14 08:45:00	30.33	15.54	7.84	256.10	2.15	20.14	25-Mar-14 08:45:00
25-Mar-14 08:46:00	30.29	15.54	7.56	256.10	2.18	20.16	25-Mar-14 08:46:00
25-Mar-14 08:47:00	30.15	15.54	7.59	256.10	2.18	20.26	25-Mar-14 08:47:00
25-Mar-14 08:48:00	30.51	15.54	7.64	256.10	2.18	20.26	25-Mar-14 08:48:00
25-Mar-14 08:49:00	29.87	15.54	7.72	256.10	2.18	20.26	25-Mar-14 08:49:00
25-Mar-14 08:50:00	29.73	15.54	7.76	256.10	2.18	20.26	25-Mar-14 08:50:00
25-Mar-14 08:51:00	29.90	15.54	7.77	256.10	2.18	20.26	25-Mar-14 08:51:00
25-Mar-14 08:52:00	29.46	15.54	7.59	256.10	2.18	19.84	25-Mar-14 08:52:00
25-Mar-14 08:53:00	29.42	15.54	7.33	256.10	2.18	19.86	25-Mar-14 08:53:00
25-Mar-14 08:54:00	29.96	15.54	8.07	256.10	2.13	20.26	25-Mar-14 08:54:00
25-Mar-14 08:55:00	29.53	15.54	8.62	256.10	2.18	20.26	25-Mar-14 08:55:00
25-Mar-14 08:56:00	29.70	15.54	8.89	256.10	2.18	20.26	25-Mar-14 08:56:00
25-Mar-14 08:57:00	29.88	15.54	8.89	256.10	2.15	20.12	25-Mar-14 08:57:00
25-Mar-14 08:58:00	30.06	15.54	7.33	256.10	2.18	20.15	25-Mar-14 08:58:00
25-Mar-14 08:59:00	30.24	15.55	7.12	256.10	2.18	20.14	25-Mar-14 08:59:00
25-Mar-14 09:00:00	30.24	15.57	6.87	256.10	2.18	19.86	25-Mar-14 09:00:00
25-Mar-14 09:01:00	30.42	15.56	6.84	256.10	2.15	19.86	25-Mar-14 09:01:00
25-Mar-14 09:02:00	30.82	15.59	5.91	256.10	2.17	20.23	25-Mar-14 09:02:00
25-Mar-14 09:03:00	30.82	15.60	5.86	256.10	2.11	19.79	25-Mar-14 09:03:00
25-Mar-14 09:04:00	30.57	15.50	6.21	256.10	2.13	19.86	25-Mar-14 09:04:00
25-Mar-14 09:05:00	30.87	15.50	6.23	256.10	2.18	19.84	25-Mar-14 09:05:00
25-Mar-14 09:06:00	30.87	15.60	5.84	256.10	2.16	20.26	25-Mar-14 09:06:00
25-Mar-14 09:07:00	30.87	15.60	5.91	256.10	2.18	20.17	25-Mar-14 09:07:00
25-Mar-14 09:08:00	30.87	15.60	5.91	256.10	2.18	20.15	25-Mar-14 09:08:00
Average Stack NOx, ppm (15% O2)	Average Stack CO, ppm (15% O2)	Average Stack O2 (%)	Average Duct Burner Gas Flow (MSCFH)	Average Turbine Gas Flow (MSCFH)	Ave. Steam Injection Rate (lb/hr)	Ave. Ammonia Injection (lb/hr)	Ave. Turbine Load (MWh)
10.53	29.94	15.55	7.54	256.10	2.15	20.07	23.83

New-Indy Oxnard, LLC  
ROSEMOUNT CEMS SOURCE TEST  
March 25, 2014

3/25/2014 9:08 3452014 9:40 1 m

Run 2

Stack NOx	Stack CO	Stack O2	Duct Burner Gas Flow	Turbine Gas Flow	Steam Injection	Ammonia Injection	Turbine Load
98_NOX_PPM	98_CO_PPM	98_O2_PCT	98_DBFLOW_A	98_TGASFLOW	98_STEAM_INJECTION	98_AMMONIA_INJECTION	98_TURBINE_LOAD
25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00
10.27	30.06	15.80	675	256.10	2.15	20.14	23.82
25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00
10.29	29.92	15.80	686	256.10	2.14	20.15	23.86
25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00
10.32	29.78	15.80	687	256.10	2.15	20.08	23.75
25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00
10.26	30.51	15.80	683	256.10	2.16	20.08	23.72
25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00
10.25	30.90	15.80	619	256.10	2.16	19.79	23.74
25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00
10.35	30.24	15.56	619	256.10	2.22	20.01	23.86
25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00
10.50	29.89	15.86	619	256.10	2.15	20.21	23.84
25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00
10.58	29.79	15.85	637	256.01	2.15	20.21	23.84
25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00
10.62	29.36	15.57	687	254.14	2.15	20.26	23.70
25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00
10.66	30.44	15.59	687	251.76	2.15	20.26	23.80
25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00
10.79	29.92	15.57	680	252.84	2.15	19.93	23.80
25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00
10.64	29.51	15.54	683	255.41	2.15	19.98	23.80
25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00
10.56	29.28	15.54	679	256.10	2.15	20.20	23.82
25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00
10.75	29.28	15.54	710	256.10	2.15	20.08	23.82
25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00
11.22	29.83	15.54	754	256.10	2.15	20.08	23.82
25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00
10.88	29.83	15.54	603	256.10	2.15	20.11	23.84
25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00
10.80	29.44	15.54	671	256.10	2.15	19.81	23.82
25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00
10.55	29.37	15.54	644	256.10	2.15	19.85	23.79
25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00
10.56	29.41	15.54	697	256.10	2.15	19.86	23.82
25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00
10.47	29.41	15.54	1036	256.10	2.15	20.35	23.82
25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00
10.32	29.41	15.54	1025	256.10	2.15	20.13	23.78
25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00
10.23	29.41	15.54	982	256.10	2.15	20.19	23.83
25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00
10.17	29.41	15.54	985	256.10	2.15	20.19	23.84
25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00
10.20	29.41	15.54	1015	256.10	2.15	20.35	23.82
25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00
10.27	29.41	15.54	1008	256.10	2.15	20.13	23.73
25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00
10.45	29.41	15.54	989	256.10	2.15	20.19	23.84
25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00
10.45	29.41	15.54	981	256.10	2.15	19.86	23.87
25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00
10.67	29.41	15.54	981	256.10	2.15	19.74	23.84
25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00
10.82	29.41	15.54	958	256.10	2.15	20.18	23.84
25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00
10.50	29.41	15.54	932	256.10	2.15	20.07	23.79
25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00
10.46	29.41	15.54	879	256.10	2.15	20.01	23.82
25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00
10.43	29.41	15.54	855	256.10	2.15	19.86	23.78
25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00
10.42	29.41	15.54	848	256.10	2.15	20.00	23.75
25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00	25-Mar-14 09:30:00
Average Stack NOx, Ppm (16% O2)	Average Stack CO, ppm (15% O2)	Average Stack O2 (%)	Average Duct Burner Gas Flow (MBCFH)	Average Turbine Gas Flow (MBCFH)	Ave. Steam Injection Rate (lb/hr)	Ave. Ammonia Injection (lb/hr)	Ave. Turbine Load (lb/wh)
10.49	29.56	15.55	8.28	255.78	2.16	20.07	23.81

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Run 3

Stack NOx	Stack CO	Stack O2	Duct Burner Gas Flow	Turbine Gas Flow	Steam Injection	Ammonia Injection	Turbine Load
10.43	29.41	15.54	7.94	256.10	2.10	20.28	23.03
10.53	29.41	15.54	7.87	256.10	2.10	20.30	23.78
10.55	29.41	15.54	8.12	256.10	2.10	20.13	23.75
10.54	29.41	15.54	8.10	256.10	2.10	20.26	23.76
10.65	29.41	15.54	8.80	256.10	2.10	20.24	23.77
10.75	29.41	15.54	9.01	256.10	2.15	20.34	23.77
10.67	29.41	15.54	9.14	256.10	2.15	20.17	23.79
10.98	29.41	15.54	9.15	256.10	2.15	20.60	23.79
11.00	29.41	15.54	9.11	256.10	2.15	20.37	23.90
10.83	29.41	15.54	8.94	256.10	2.15	20.24	23.89
10.12	29.41	15.54	8.71	256.10	2.15	20.49	23.74
10.07	29.41	15.54	8.70	256.10	2.15	20.51	23.82
10.19	29.41	15.54	8.88	256.10	2.14	19.84	23.75
10.48	29.41	15.54	8.25	256.10	2.19	20.34	23.80
10.80	29.41	15.54	8.25	256.10	2.17	20.48	23.86
10.73	29.41	15.54	8.25	256.10	2.15	20.83	23.86
10.52	29.41	15.54	8.25	256.10	2.14	20.52	23.86
10.53	29.41	15.54	8.25	256.10	2.15	20.18	23.67
10.63	29.41	15.54	8.25	256.10	2.12	20.13	23.79
10.81	29.41	15.54	8.25	256.10	2.15	20.17	23.84
10.54	29.41	15.54	8.25	256.10	2.15	19.88	23.65
10.43	29.41	15.54	8.25	256.10	2.15	20.10	23.65
10.32	29.41	15.54	8.25	256.10	2.12	20.10	23.61
10.28	29.41	15.54	8.25	256.10	2.15	20.04	23.71
10.49	29.41	15.54	8.25	256.10	2.15	20.03	23.87
10.51	29.41	15.54	8.25	256.10	2.14	20.03	23.75
10.46	29.41	15.54	8.25	256.10	2.18	20.18	23.87
10.44	29.41	15.54	8.25	256.10	2.15	20.33	23.73
10.25	29.41	15.54	8.25	256.10	2.15	20.08	23.81
10.73	29.41	15.54	8.25	256.10	2.14	20.43	23.84
<b>Average Stack NOx, ppm (15% O2)</b>	<b>Average Stack CO, ppm (15% O2)</b>	<b>Average Stack O2 (%)</b>	<b>Average Duct Burner Gas Flow (BSCFH)</b>	<b>Average Turbine Gas Flow (MSCFH)</b>	<b>Average Steam Injection Rate (lbs)</b>	<b>Average Ammonia Injection (lb/hr)</b>	<b>Average Turbine Load (MWH)</b>
10.55	29.26	15.54	8.22	256.74	2.15	20.25	23.79

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Run 4

Stack NOx	Stack CO	Stack O2	Duct Burner Gas Flow	Turbine Gas Flow	Steam Injection	Ammonia Injection	Turbine Load
RS_31AKC1116.CO	RS_31AKC1116.CO	RS_31AKC1116.O2	DUCTBURNER_GAS_FLOW	TURBINE_GAS_FLOW	STEAM_INJECTION	AMMONIA_INJECTION	TURBINE_LOAD
25-Mar-14 10:40:00	25-Mar-14 10:40:00	25-Mar-14 10:40:00	25-Mar-14 10:40:00	25-Mar-14 10:40:00	25-Mar-14 10:40:00	25-Mar-14 10:40:00	25-Mar-14 10:40:00
10.17	28.24	15.55	8.02	256.10	2.15	20.19	23.81
10.13	28.24	15.55	7.98	256.10	2.15	20.47	23.74
10.25	28.24	15.55	8.11	256.10	2.15	20.44	23.81
10.25	28.24	15.55	8.13	256.10	2.15	20.35	23.73
10.25	28.24	15.55	8.10	256.10	2.15	20.26	23.54
10.17	28.24	15.55	8.08	256.10	2.15	20.26	23.62
10.19	28.24	15.55	8.07	256.10	2.15	20.25	23.78
10.19	28.24	15.55	8.20	256.10	2.15	20.48	23.75
10.06	28.24	15.55	8.41	256.10	2.15	20.25	23.90
10.08	28.24	15.55	9.04	256.10	2.15	20.25	23.87
10.15	28.24	15.55	9.04	256.10	2.15	20.25	23.87
10.25	28.24	15.55	9.04	256.10	2.15	20.25	23.87
10.37	28.24	15.55	9.04	256.10	2.15	20.25	23.87
10.38	28.24	15.55	10.44	256.10	2.15	20.25	23.72
10.39	28.24	15.55	11.10	256.10	2.15	20.25	23.86
10.42	28.24	15.55	11.89	256.10	2.15	20.25	23.85
10.47	28.24	15.55	12.22	256.10	2.15	20.25	23.81
10.40	28.24	15.55	12.38	256.10	2.15	20.25	23.72
10.30	28.24	15.55	13.11	256.10	2.15	20.25	23.75
10.43	28.24	15.55	13.86	256.10	2.15	20.25	23.75
10.64	28.24	15.55	13.40	256.10	2.15	20.25	23.75
10.55	28.24	15.55	12.27	256.10	2.15	20.25	23.77
10.36	28.24	15.55	11.73	256.10	2.15	20.25	23.81
10.47	28.24	15.55	11.43	256.10	2.15	20.25	23.78
10.65	28.24	15.55	11.37	256.10	2.15	20.25	23.98
10.82	28.24	15.55	11.41	256.10	2.15	20.25	23.86
10.80	28.24	15.55	11.39	256.10	2.15	20.25	23.86
10.78	28.24	15.55	11.35	256.10	2.15	20.25	23.86
10.71	28.24	15.55	11.39	256.10	2.15	20.25	23.86
10.64	28.24	15.55	11.17	256.10	2.15	20.25	23.81
10.62	28.24	15.55	10.66	256.10	2.15	20.25	23.81
10.62	28.24	15.55	10.78	256.10	2.15	20.25	23.81
<b>Average Stack NOx, ppm (15% O2)</b>	<b>Average Stack CO, ppm (15% O2)</b>	<b>Average Stack O2 (%)</b>	<b>Average Duct Burner Gas Flow (MBCFH)</b>	<b>Average Turbine Gas Flow (MBCFH)</b>	<b>Ave. Steam Injection Rate (t/hr)</b>	<b>Ave. Ammonia Injection (t/hr)</b>	<b>Ave. Turbine Load (t/hr)</b>
10.40	28.04	15.49	10.54	256.10	2.16	20.25	23.80

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Run 5

Stack NOx	Stack CO	Stack O2	Duct Burner Gas Flow DEGASFLOW_A	Turbine Gas Flow GTGASFLOW	Steam Injection S21-2016.SVO	Ammonia Injection S11FIC1173_MV	Turbine Load
RS_01MAC11515.CCO	RS_01MAC11515.CCO	RS_01MAC11515.O2	DEGASFLOW_A	GTGASFLOW	S21-2016.SVO	S11FIC1173_MV	S21-2016.DWATT
19.37	27.85	15.48	25-Mar-14 11:13:00	25-Mar-14 11:13:00	25-Mar-14 11:13:00	25-Mar-14 11:13:00	25-Mar-14 11:13:00
10.44	27.85	15.48	25-Mar-14 11:14:00	25-Mar-14 11:14:00	25-Mar-14 11:14:00	25-Mar-14 11:14:00	25-Mar-14 11:14:00
10.48	27.85	15.48	25-Mar-14 11:15:00	25-Mar-14 11:15:00	25-Mar-14 11:15:00	25-Mar-14 11:15:00	25-Mar-14 11:15:00
10.54	27.85	15.48	25-Mar-14 11:16:00	25-Mar-14 11:16:00	25-Mar-14 11:16:00	25-Mar-14 11:16:00	25-Mar-14 11:16:00
10.45	27.85	15.48	25-Mar-14 11:17:00	25-Mar-14 11:17:00	25-Mar-14 11:17:00	25-Mar-14 11:17:00	25-Mar-14 11:17:00
10.33	27.85	15.48	25-Mar-14 11:18:00	25-Mar-14 11:18:00	25-Mar-14 11:18:00	25-Mar-14 11:18:00	25-Mar-14 11:18:00
10.48	27.85	15.48	25-Mar-14 11:19:00	25-Mar-14 11:19:00	25-Mar-14 11:19:00	25-Mar-14 11:19:00	25-Mar-14 11:19:00
10.71	27.85	15.48	25-Mar-14 11:20:00	25-Mar-14 11:20:00	25-Mar-14 11:20:00	25-Mar-14 11:20:00	25-Mar-14 11:20:00
10.40	27.85	15.48	25-Mar-14 11:21:00	25-Mar-14 11:21:00	25-Mar-14 11:21:00	25-Mar-14 11:21:00	25-Mar-14 11:21:00
10.00	27.85	15.48	25-Mar-14 11:22:00	25-Mar-14 11:22:00	25-Mar-14 11:22:00	25-Mar-14 11:22:00	25-Mar-14 11:22:00
10.05	27.85	15.48	25-Mar-14 11:23:00	25-Mar-14 11:23:00	25-Mar-14 11:23:00	25-Mar-14 11:23:00	25-Mar-14 11:23:00
10.18	27.85	15.48	25-Mar-14 11:24:00	25-Mar-14 11:24:00	25-Mar-14 11:24:00	25-Mar-14 11:24:00	25-Mar-14 11:24:00
10.26	27.85	15.48	25-Mar-14 11:25:00	25-Mar-14 11:25:00	25-Mar-14 11:25:00	25-Mar-14 11:25:00	25-Mar-14 11:25:00
10.61	27.85	15.48	25-Mar-14 11:26:00	25-Mar-14 11:26:00	25-Mar-14 11:26:00	25-Mar-14 11:26:00	25-Mar-14 11:26:00
10.45	27.85	15.48	25-Mar-14 11:27:00	25-Mar-14 11:27:00	25-Mar-14 11:27:00	25-Mar-14 11:27:00	25-Mar-14 11:27:00
10.17	27.85	15.48	25-Mar-14 11:28:00	25-Mar-14 11:28:00	25-Mar-14 11:28:00	25-Mar-14 11:28:00	25-Mar-14 11:28:00
10.26	27.85	15.48	25-Mar-14 11:29:00	25-Mar-14 11:29:00	25-Mar-14 11:29:00	25-Mar-14 11:29:00	25-Mar-14 11:29:00
10.48	27.85	15.48	25-Mar-14 11:30:00	25-Mar-14 11:30:00	25-Mar-14 11:30:00	25-Mar-14 11:30:00	25-Mar-14 11:30:00
10.41	27.85	15.48	25-Mar-14 11:31:00	25-Mar-14 11:31:00	25-Mar-14 11:31:00	25-Mar-14 11:31:00	25-Mar-14 11:31:00
10.24	27.85	15.48	25-Mar-14 11:32:00	25-Mar-14 11:32:00	25-Mar-14 11:32:00	25-Mar-14 11:32:00	25-Mar-14 11:32:00
10.41	27.85	15.48	25-Mar-14 11:33:00	25-Mar-14 11:33:00	25-Mar-14 11:33:00	25-Mar-14 11:33:00	25-Mar-14 11:33:00
10.70	27.85	15.48	25-Mar-14 11:34:00	25-Mar-14 11:34:00	25-Mar-14 11:34:00	25-Mar-14 11:34:00	25-Mar-14 11:34:00
10.67	27.85	15.48	25-Mar-14 11:35:00	25-Mar-14 11:35:00	25-Mar-14 11:35:00	25-Mar-14 11:35:00	25-Mar-14 11:35:00
10.51	27.85	15.48	25-Mar-14 11:36:00	25-Mar-14 11:36:00	25-Mar-14 11:36:00	25-Mar-14 11:36:00	25-Mar-14 11:36:00
10.44	27.85	15.48	25-Mar-14 11:37:00	25-Mar-14 11:37:00	25-Mar-14 11:37:00	25-Mar-14 11:37:00	25-Mar-14 11:37:00
10.29	27.85	15.48	25-Mar-14 11:38:00	25-Mar-14 11:38:00	25-Mar-14 11:38:00	25-Mar-14 11:38:00	25-Mar-14 11:38:00
10.38	27.85	15.48	25-Mar-14 11:39:00	25-Mar-14 11:39:00	25-Mar-14 11:39:00	25-Mar-14 11:39:00	25-Mar-14 11:39:00
10.38	27.85	15.48	25-Mar-14 11:40:00	25-Mar-14 11:40:00	25-Mar-14 11:40:00	25-Mar-14 11:40:00	25-Mar-14 11:40:00
10.21	27.85	15.48	25-Mar-14 11:41:00	25-Mar-14 11:41:00	25-Mar-14 11:41:00	25-Mar-14 11:41:00	25-Mar-14 11:41:00
10.18	27.85	15.48	25-Mar-14 11:42:00	25-Mar-14 11:42:00	25-Mar-14 11:42:00	25-Mar-14 11:42:00	25-Mar-14 11:42:00
10.18	27.85	15.48	25-Mar-14 11:43:00	25-Mar-14 11:43:00	25-Mar-14 11:43:00	25-Mar-14 11:43:00	25-Mar-14 11:43:00
10.18	27.85	15.48	25-Mar-14 11:44:00	25-Mar-14 11:44:00	25-Mar-14 11:44:00	25-Mar-14 11:44:00	25-Mar-14 11:44:00
<b>Average Stack NOx, ppm (15% O2)</b>	<b>Average Stack CO, ppm (15% O2)</b>	<b>Average Stack O2 (%)</b>	<b>Average Duct Burner Gas Flow (MSCFH)</b>	<b>Average Turbine Gas Flow (MSCFH)</b>	<b>Ave. Steam Injection Rate (lbs/hr)</b>	<b>Ave. Ammonia Injection (lb/hr)</b>	<b>Ave. Turbine Load (MWh)</b>
10.39	27.46	15.47	256.10	256.10	2.15	20.56	23.64

New-Indy Oxnard, LLC  
ROSEMOUNT CEMS SOURCE TEST  
March 25, 2014

Run 6

3/25/2014 11:45 3/25/2014 12:18 1 m

Stack NOx	Stack CO	Stack O2	Duct Burner Gas Flow	Turbine Gas Flow	Steam Injection	Ammonia Injection	Turbine Load
RS_NOX_PPM	RS_STACK11C.CO	RS_STACK11B.O2	DUCTBURNER.GAS.FLOW	TURBINE.GAS.FLOW	STEAM.INJECTION	AMMONIA.INJECTION	TURBINE.LOAD
25-Mar-14 11:40:00	26.96	15.48	25-Mar-14 11:40:00 11.13	25-Mar-14 11:40:00 256.18	25-Mar-14 11:40:00 2.13	25-Mar-14 11:40:00 20.62	25-Mar-14 11:40:00 23.87
25-Mar-14 11:41:00	26.96	15.48	25-Mar-14 11:41:00 11.47	25-Mar-14 11:41:00 256.07	25-Mar-14 11:41:00 2.15	25-Mar-14 11:41:00 20.66	25-Mar-14 11:41:00 23.86
25-Mar-14 11:42:00	26.96	15.48	25-Mar-14 11:42:00 11.88	25-Mar-14 11:42:00 256.45	25-Mar-14 11:42:00 2.15	25-Mar-14 11:42:00 20.73	25-Mar-14 11:42:00 23.84
25-Mar-14 11:43:00	26.96	15.47	25-Mar-14 11:43:00 11.83	25-Mar-14 11:43:00 256.29	25-Mar-14 11:43:00 2.18	25-Mar-14 11:43:00 20.48	25-Mar-14 11:43:00 23.81
25-Mar-14 11:44:00	26.96	15.44	25-Mar-14 11:44:00 11.92	25-Mar-14 11:44:00 256.79	25-Mar-14 11:44:00 2.18	25-Mar-14 11:44:00 20.74	25-Mar-14 11:44:00 23.85
25-Mar-14 11:45:00	26.78	15.44	25-Mar-14 11:45:00 11.75	25-Mar-14 11:45:00 256.10	25-Mar-14 11:45:00 2.17	25-Mar-14 11:45:00 20.61	25-Mar-14 11:45:00 24.00
25-Mar-14 11:46:00	26.78	15.43	25-Mar-14 11:46:00 11.49	25-Mar-14 11:46:00 256.10	25-Mar-14 11:46:00 2.15	25-Mar-14 11:46:00 20.74	25-Mar-14 11:46:00 23.83
25-Mar-14 11:47:00	26.78	15.45	25-Mar-14 11:47:00 11.48	25-Mar-14 11:47:00 256.10	25-Mar-14 11:47:00 2.14	25-Mar-14 11:47:00 21.02	25-Mar-14 11:47:00 23.83
25-Mar-14 11:48:00	26.71	15.45	25-Mar-14 11:48:00 11.90	25-Mar-14 11:48:00 256.10	25-Mar-14 11:48:00 2.15	25-Mar-14 11:48:00 20.80	25-Mar-14 11:48:00 23.79
25-Mar-14 11:49:00	26.20	15.44	25-Mar-14 11:49:00 12.33	25-Mar-14 11:49:00 256.10	25-Mar-14 11:49:00 2.15	25-Mar-14 11:49:00 20.45	25-Mar-14 11:49:00 23.77
25-Mar-14 11:50:00	26.93	15.45	25-Mar-14 11:50:00 13.27	25-Mar-14 11:50:00 256.10	25-Mar-14 11:50:00 2.16	25-Mar-14 11:50:00 20.67	25-Mar-14 11:50:00 23.67
25-Mar-14 11:51:00	26.95	15.46	25-Mar-14 11:51:00 13.45	25-Mar-14 11:51:00 256.10	25-Mar-14 11:51:00 2.16	25-Mar-14 11:51:00 20.83	25-Mar-14 11:51:00 23.96
25-Mar-14 11:52:00	26.73	15.47	25-Mar-14 11:52:00 13.34	25-Mar-14 11:52:00 256.10	25-Mar-14 11:52:00 2.16	25-Mar-14 11:52:00 20.71	25-Mar-14 11:52:00 23.96
25-Mar-14 11:53:00	26.90	15.49	25-Mar-14 11:53:00 13.63	25-Mar-14 11:53:00 256.10	25-Mar-14 11:53:00 2.15	25-Mar-14 11:53:00 20.75	25-Mar-14 11:53:00 23.90
25-Mar-14 11:54:00	26.80	15.49	25-Mar-14 11:54:00 14.01	25-Mar-14 11:54:00 256.10	25-Mar-14 11:54:00 2.17	25-Mar-14 11:54:00 20.63	25-Mar-14 11:54:00 23.84
25-Mar-14 11:55:00	26.75	15.46	25-Mar-14 11:55:00 13.52	25-Mar-14 11:55:00 256.10	25-Mar-14 11:55:00 2.22	25-Mar-14 11:55:00 20.67	25-Mar-14 11:55:00 24.17
25-Mar-14 11:56:00	26.98	15.43	25-Mar-14 11:56:00 12.89	25-Mar-14 11:56:00 256.10	25-Mar-14 11:56:00 2.15	25-Mar-14 11:56:00 20.77	25-Mar-14 11:56:00 23.80
25-Mar-14 11:57:00	26.72	15.44	25-Mar-14 11:57:00 12.56	25-Mar-14 11:57:00 256.10	25-Mar-14 11:57:00 2.10	25-Mar-14 11:57:00 20.81	25-Mar-14 11:57:00 23.84
25-Mar-14 11:58:00	26.90	15.45	25-Mar-14 11:58:00 11.51	25-Mar-14 11:58:00 256.10	25-Mar-14 11:58:00 2.13	25-Mar-14 11:58:00 20.81	25-Mar-14 11:58:00 23.85
25-Mar-14 11:59:00	26.94	15.45	25-Mar-14 11:59:00 11.47	25-Mar-14 11:59:00 256.10	25-Mar-14 11:59:00 2.20	25-Mar-14 11:59:00 20.96	25-Mar-14 11:59:00 23.80
25-Mar-14 12:00:00	26.96	15.46	25-Mar-14 12:00:00 11.82	25-Mar-14 12:00:00 256.10	25-Mar-14 12:00:00 2.13	25-Mar-14 12:00:00 20.88	25-Mar-14 12:00:00 23.67
25-Mar-14 12:01:00	27.03	15.47	25-Mar-14 12:01:00 11.75	25-Mar-14 12:01:00 256.10	25-Mar-14 12:01:00 2.14	25-Mar-14 12:01:00 20.87	25-Mar-14 12:01:00 23.80
25-Mar-14 12:02:00	27.07	15.49	25-Mar-14 12:02:00 11.86	25-Mar-14 12:02:00 256.10	25-Mar-14 12:02:00 2.16	25-Mar-14 12:02:00 20.70	25-Mar-14 12:02:00 23.75
25-Mar-14 12:03:00	27.11	15.48	25-Mar-14 12:03:00 11.57	25-Mar-14 12:03:00 256.10	25-Mar-14 12:03:00 2.17	25-Mar-14 12:03:00 20.89	25-Mar-14 12:03:00 23.80
25-Mar-14 12:04:00	27.15	15.49	25-Mar-14 12:04:00 11.14	25-Mar-14 12:04:00 256.10	25-Mar-14 12:04:00 2.17	25-Mar-14 12:04:00 20.83	25-Mar-14 12:04:00 23.70
25-Mar-14 12:05:00	27.04	15.46	25-Mar-14 12:05:00 10.86	25-Mar-14 12:05:00 256.10	25-Mar-14 12:05:00 2.15	25-Mar-14 12:05:00 20.96	25-Mar-14 12:05:00 23.84
25-Mar-14 12:06:00	26.92	15.48	25-Mar-14 12:06:00 10.63	25-Mar-14 12:06:00 256.10	25-Mar-14 12:06:00 2.16	25-Mar-14 12:06:00 20.73	25-Mar-14 12:06:00 23.86
25-Mar-14 12:07:00	27.02	15.48	25-Mar-14 12:07:00 10.27	25-Mar-14 12:07:00 256.10	25-Mar-14 12:07:00 2.16	25-Mar-14 12:07:00 20.71	25-Mar-14 12:07:00 23.86
25-Mar-14 12:08:00	27.02	15.49	25-Mar-14 12:08:00 9.89	25-Mar-14 12:08:00 256.10	25-Mar-14 12:08:00 2.14	25-Mar-14 12:08:00 20.77	25-Mar-14 12:08:00 23.66
25-Mar-14 12:09:00	27.03	15.49	25-Mar-14 12:09:00 9.76	25-Mar-14 12:09:00 256.10	25-Mar-14 12:09:00 2.15	25-Mar-14 12:09:00 20.81	25-Mar-14 12:09:00 23.71
25-Mar-14 12:10:00	26.20	15.49	25-Mar-14 12:10:00 9.76	25-Mar-14 12:10:00 256.10	25-Mar-14 12:10:00 2.14	25-Mar-14 12:10:00 20.67	25-Mar-14 12:10:00 23.73
25-Mar-14 12:11:00	26.20	15.49	25-Mar-14 12:11:00 9.76	25-Mar-14 12:11:00 256.10	25-Mar-14 12:11:00 2.13	25-Mar-14 12:11:00 20.95	25-Mar-14 12:11:00 23.77
25-Mar-14 12:12:00	26.80	15.46	Average Duct Burner Gas Flow (MSCFH) 11.70	Average Turbine Gas Flow (MSCFH) 256.42	Ave. Steam Injection Rate (lbs/hr) 2.15	Ave. Ammonia Injection (lb/hr) 20.75	Ave. Turbine Load (MWh) 23.85
25-Mar-14 12:13:00	26.80	15.46	Average Stack NOx (ppm O2) 10.52	Average Stack CO (ppm O2) 26.80	Average Stack O2 (%) 15.46	Average Turbine Load (MWh) 23.85	
25-Mar-14 12:14:00	26.80	15.46					
25-Mar-14 12:15:00	26.80	15.46					
25-Mar-14 12:16:00	26.80	15.46					
25-Mar-14 12:17:00	26.80	15.46					

ISL_NOX_PPM	Stack NOx	Stack CO	Stack O2	Duct Burner Gas Flow	Turbine Gas Flow	Steam Injection	Ammonia Injection	Turbine Load
10.37	25-Mar-14 12:45:00	25.40	15.53	25-Mar-14 12:45:00	256.00	2.15	21.11	25-Mar-14 12:45:00
10.37	25-Mar-14 12:46:00	28.43	15.52	25-Mar-14 12:46:00	256.00	2.15	20.99	25-Mar-14 12:46:00
10.41	25-Mar-14 12:47:00	28.18	15.51	25-Mar-14 12:47:00	256.00	2.17	21.08	25-Mar-14 12:47:00
10.48	25-Mar-14 12:48:00	27.85	15.52	25-Mar-14 12:48:00	256.00	2.19	21.05	25-Mar-14 12:48:00
10.45	25-Mar-14 12:49:00	27.60	15.53	25-Mar-14 12:49:00	256.00	2.18	20.97	25-Mar-14 12:49:00
10.49	25-Mar-14 12:50:00	27.44	15.54	25-Mar-14 12:50:00	256.00	2.15	20.95	25-Mar-14 12:50:00
10.58	25-Mar-14 12:51:00	27.20	15.55	25-Mar-14 12:51:00	256.00	2.15	20.98	25-Mar-14 12:51:00
10.69	25-Mar-14 12:52:00	27.62	15.52	25-Mar-14 12:52:00	256.00	2.15	20.98	25-Mar-14 12:52:00
10.68	25-Mar-14 12:53:00	28.20	15.52	25-Mar-14 12:53:00	256.00	2.15	21.10	25-Mar-14 12:53:00
10.67	25-Mar-14 12:54:00	28.28	15.51	25-Mar-14 12:54:00	256.00	2.14	21.08	25-Mar-14 12:54:00
10.61	25-Mar-14 12:55:00	28.31	15.52	25-Mar-14 12:55:00	256.00	2.15	21.08	25-Mar-14 12:55:00
10.72	25-Mar-14 12:56:00	28.36	15.53	25-Mar-14 12:56:00	256.00	2.18	20.91	25-Mar-14 12:56:00
10.83	25-Mar-14 12:57:00	28.41	15.54	25-Mar-14 12:57:00	256.00	2.18	21.15	25-Mar-14 12:57:00
10.95	25-Mar-14 12:58:00	28.46	15.55	25-Mar-14 12:58:00	256.00	2.15	20.85	25-Mar-14 12:58:00
11.00	25-Mar-14 12:59:00	28.33	15.52	25-Mar-14 12:59:00	256.00	2.15	20.85	25-Mar-14 12:59:00
10.82	25-Mar-14 13:00:00	28.42	15.54	25-Mar-14 13:00:00	256.00	2.18	20.86	25-Mar-14 13:00:00
10.81	25-Mar-14 13:01:00	28.28	15.51	25-Mar-14 13:01:00	256.00	2.15	21.10	25-Mar-14 13:01:00
10.78	25-Mar-14 13:02:00	28.13	15.52	25-Mar-14 13:02:00	256.00	2.18	20.82	25-Mar-14 13:02:00
10.79	25-Mar-14 13:03:00	28.32	15.54	25-Mar-14 13:03:00	256.00	2.17	21.13	25-Mar-14 13:03:00
10.98	25-Mar-14 13:04:00	28.20	15.53	25-Mar-14 13:04:00	256.00	2.15	21.14	25-Mar-14 13:04:00
10.33	25-Mar-14 13:05:00	28.90	15.55	25-Mar-14 13:05:00	256.00	2.15	20.87	25-Mar-14 13:05:00
10.47	25-Mar-14 13:06:00	29.00	15.54	25-Mar-14 13:06:00	256.00	2.15	21.12	25-Mar-14 13:06:00
10.45	25-Mar-14 13:07:00	28.99	15.53	25-Mar-14 13:07:00	256.00	2.15	20.79	25-Mar-14 13:07:00
10.48	25-Mar-14 13:08:00	29.08	15.54	25-Mar-14 13:08:00	256.00	2.15	20.79	25-Mar-14 13:08:00
10.51	25-Mar-14 13:09:00	29.28	15.52	25-Mar-14 13:09:00	256.00	2.15	21.22	25-Mar-14 13:09:00
10.52	25-Mar-14 13:10:00	28.79	15.53	25-Mar-14 13:10:00	256.00	2.18	20.92	25-Mar-14 13:10:00
10.52	25-Mar-14 13:11:00	28.86	15.53	25-Mar-14 13:11:00	256.00	2.18	21.05	25-Mar-14 13:11:00
10.51	25-Mar-14 13:12:00	28.14	15.55	25-Mar-14 13:12:00	256.00	2.15	21.05	25-Mar-14 13:12:00
10.51	25-Mar-14 13:13:00	28.20	15.51	25-Mar-14 13:13:00	256.00	2.18	21.23	25-Mar-14 13:13:00
10.51	25-Mar-14 13:14:00	28.23	15.49	25-Mar-14 13:14:00	256.00	2.15	21.23	25-Mar-14 13:14:00
10.37	25-Mar-14 13:15:00	28.83	15.48	25-Mar-14 13:15:00	256.00	2.18	21.42	25-Mar-14 13:15:00
10.65	25-Mar-14 13:16:00	28.35	15.48	25-Mar-14 13:16:00	256.00	2.18	20.88	25-Mar-14 13:16:00
10.65	25-Mar-14 13:17:00	28.35	15.48	25-Mar-14 13:17:00	256.00	2.18	21.31	25-Mar-14 13:17:00
10.62	25-Mar-14 13:18:00	28.35	15.48	25-Mar-14 13:18:00	256.00	2.18	21.31	25-Mar-14 13:18:00
10.62	25-Mar-14 13:19:00	28.35	15.48	25-Mar-14 13:19:00	256.00	2.18	21.31	25-Mar-14 13:19:00
10.62	25-Mar-14 13:20:00	28.35	15.48	25-Mar-14 13:20:00	256.00	2.18	21.31	25-Mar-14 13:20:00
10.62	25-Mar-14 13:21:00	28.35	15.48	25-Mar-14 13:21:00	256.00	2.18	21.31	25-Mar-14 13:21:00
10.62	25-Mar-14 13:22:00	28.35	15.48	25-Mar-14 13:22:00	256.00	2.18	21.31	25-Mar-14 13:22:00
10.62	25-Mar-14 13:23:00	28.35	15.48	25-Mar-14 13:23:00	256.00	2.18	21.31	25-Mar-14 13:23:00
10.62	25-Mar-14 13:24:00	28.35	15.48	25-Mar-14 13:24:00	256.00	2.18	21.31	25-Mar-14 13:24:00
10.62	25-Mar-14 13:25:00	28.35	15.48	25-Mar-14 13:25:00	256.00	2.18	21.31	25-Mar-14 13:25:00
10.62	25-Mar-14 13:26:00	28.35	15.48	25-Mar-14 13:26:00	256.00	2.18	21.31	25-Mar-14 13:26:00
10.62	25-Mar-14 13:27:00	28.35	15.48	25-Mar-14 13:27:00	256.00	2.18	21.31	25-Mar-14 13:27:00
10.62	25-Mar-14 13:28:00	28.35	15.48	25-Mar-14 13:28:00	256.00	2.18	21.31	25-Mar-14 13:28:00
10.62	25-Mar-14 13:29:00	28.35	15.48	25-Mar-14 13:29:00	256.00	2.18	21.31	25-Mar-14 13:29:00
10.62	25-Mar-14 13:30:00	28.35	15.48	25-Mar-14 13:30:00	256.00	2.18	21.31	25-Mar-14 13:30:00
10.62	25-Mar-14 13:31:00	28.35	15.48	25-Mar-14 13:31:00	256.00	2.18	21.31	25-Mar-14 13:31:00
10.62	25-Mar-14 13:32:00	28.35	15.48	25-Mar-14 13:32:00	256.00	2.18	21.31	25-Mar-14 13:32:00
10.62	25-Mar-14 13:33:00	28.35	15.48	25-Mar-14 13:33:00	256.00	2.18	21.31	25-Mar-14 13:33:00
10.62	25-Mar-14 13:34:00	28.35	15.48	25-Mar-14 13:34:00	256.00	2.18	21.31	25-Mar-14 13:34:00
10.62	25-Mar-14 13:35:00	28.35	15.48	25-Mar-14 13:35:00	256.00	2.18	21.31	25-Mar-14 13:35:00
10.62	25-Mar-14 13:36:00	28.35	15.48	25-Mar-14 13:36:00	256.00	2.18	21.31	25-Mar-14 13:36:00
10.62	25-Mar-14 13:37:00	28.35	15.48	25-Mar-14 13:37:00	256.00	2.18	21.31	25-Mar-14 13:37:00
10.62	25-Mar-14 13:38:00	28.35	15.48	25-Mar-14 13:38:00	256.00	2.18	21.31	25-Mar-14 13:38:00
10.62	25-Mar-14 13:39:00	28.35	15.48	25-Mar-14 13:39:00	256.00	2.18	21.31	25-Mar-14 13:39:00
10.62	25-Mar-14 13:40:00	28.35	15.48	25-Mar-14 13:40:00	256.00	2.18	21.31	25-Mar-14 13:40:00
10.62	25-Mar-14 13:41:00	28.35	15.48	25-Mar-14 13:41:00	256.00	2.18	21.31	25-Mar-14 13:41:00
10.62	25-Mar-14 13:42:00	28.35	15.48	25-Mar-14 13:42:00	256.00	2.18	21.31	25-Mar-14 13:42:00
10.62	25-Mar-14 13:43:00	28.35	15.48	25-Mar-14 13:43:00	256.00	2.18	21.31	25-Mar-14 13:43:00
10.62	25-Mar-14 13:44:00	28.35	15.48	25-Mar-14 13:44:00	256.00	2.18	21.31	25-Mar-14 13:44:00
10.62	25-Mar-14 13:45:00	28.35	15.48	25-Mar-14 13:45:00	256.00	2.18	21.31	25-Mar-14 13:45:00
10.62	25-Mar-14 13:46:00	28.35	15.48	25-Mar-14 13:46:00	256.00	2.18	21.31	25-Mar-14 13:46:00
10.62	25-Mar-14 13:47:00	28.35	15.48	25-Mar-14 13:47:00	256.00	2.18	21.31	25-Mar-14 13:47:00
10.62	25-Mar-14 13:48:00	28.35	15.48	25-Mar-14 13:48:00	256.00	2.18	21.31	25-Mar-14 13:48:00
10.62	25-Mar-14 13:49:00	28.35	15.48	25-Mar-14 13:49:00	256.00	2.18	21.31	25-Mar-14 13:49:00
10.62	25-Mar-14 13:50:00	28.35	15.48	25-Mar-14 13:50:00	256.00	2.18	21.31	25-Mar-14 13:50:00
10.62	25-Mar-14 13:51:00	28.35	15.48	25-Mar-14 13:51:00	256.00	2.18	21.31	25-Mar-14 13:51:00
10.62	25-Mar-14 13:52:00	28.35	15.48	25-Mar-14 13:52:00	256.00	2.18	21.31	25-Mar-14 13:52:00
10.62	25-Mar-14 13:53:00	28.35	15.48	25-Mar-14 13:53:00	256.00	2.18	21.31	25-Mar-14 13:53:00
10.62	25-Mar-14 13:54:00	28.35	15.48	25-Mar-14 13:54:00	256.00	2.18	21.31	25-Mar-14 13:54:00
10.62	25-Mar-14 13:55:00	28.35	15.48	25-Mar-14 13:55:00	256.00	2.18	21.31	25-Mar-14 13:55:00
10.62	25-Mar-14 13:56:00	28.35	15.48	25-Mar-14 13:56:00	256.00	2.18	21.31	25-Mar-14 13:56:00
10.62	25-Mar-14 13:57:00	28.35	15.48	25-Mar-14 13:57:00	256.00	2.18	21.31	25-Mar-14 13:57:00
10.62	25-Mar-14 13:58:00	28.35	15.48	25-Mar-14 13:58:00	256.00	2.18	21.31	25-Mar-14 13:58:00
10.62	25-Mar-14 13:59:00	28.35	15.48	25-Mar-14 13:59:00	256.00	2.18	21.31	25-Mar-14 13:59:00
10.62	25-Mar-14 14:00:00	28.35	15.48	25-Mar-14 14:00:00	256.00	2.18	21.31	25-Mar-14 14:00:00
10.62	25-Mar-14 14:01:00	28.35	15.48	25-Mar-14 14:01:00	256.00	2.18	21.31	25-Mar-14 14:01:00
10.62	25-Mar-14 14:02:00	28.35	15.48	25-Mar-14 14:02:00	256.00	2.18	21.31	25-Mar-14 14:02:00
10.62	25-Mar-14 14:03:00	28.35	15.48	25-Mar-14 14:03:00	256.00	2.18	21.31	25-Mar-14 14:03:00
10.62	25-Mar-14 14:04:00	28.35	15.48	25-Mar-14 14:04:00	256.00	2.18	21.31	25-Mar-14 14:04:00
10.62	25-Mar-14 14:05:00	28.35	15.48	25-Mar-14 14:05:00	256.00	2.18	21.31	25-Mar-14 14:05:00
10.62	25-Mar-14 14:06:00	28.35	15.48	25-Mar-14 14:06:00	256.00	2.18	21.31	25-Mar-14 14:06:00
10.62	25-Mar-14 14:07:00	28.35	15.48	25-Mar-14 14:07:00	256.00	2.18	21.31	25-Mar-14 14:07:00
10.62	25-Mar-14 14:08:00	28.35	15.48	25-Mar-14 14:08:00	256.00	2.18	21.31	25-Mar-14 14:08:00
10.62	25-Mar-14 14:09:00	28.35	15.48	25-Mar-14 14:09:00	256.00	2.18	21.31	25-Mar-14 14:09:00
10.62	25-Mar-14 14:10:00	28.35	15.48	25-Mar-14 14:10:00	256.00	2.18	21.31	25-Mar-14 14:10:00
10.62	25-Mar-14 14:11:00	28.35	15.48	25-Mar-14 14:11:00	256.00	2.18	21.31	25-Mar-14 14:11:00
10.62	25-Mar-14 14:12:00	28.35	15.48	25-Mar-14 14:12:00	256.00	2.18	21.31	25-Mar-14 14:12:00
10.62	25-Mar-14 14:13:00	28.35	15.48	25-Mar-14 14:13:00	256.00	2.		

New-Indy Oxnard, LLC  
ROSEMOUNT CEMS SOURCE TEST  
March 25, 2014

3/25/2014 13:51 3/25/2014 14:23 1 m

Run 9

Stack NOx	Stack CO	Stack O2	Duct Burner Gas Flow	Turbine Gas Flow	Steam Injection	Ammonia Injection	Turbine Load
RS_APMCT111C.CCO	RS_APMCT111C.CCO	RS_APMCT111B.O2	DEGASFLOW_A	GTOASFLOW	R21-2015.WO	R11FC1173.MF	R21-2016.DWATT
25-Mar-14 13:51:00	28.24	15.54	25-Mar-14 13:51:00	295.10	2.16	20.70	20.81
25-Mar-14 13:52:00	28.29	15.55	25-Mar-14 13:52:00	295.10	2.15	21.18	20.80
25-Mar-14 13:53:00	28.11	15.52	25-Mar-14 13:53:00	295.10	2.16	21.34	20.80
25-Mar-14 13:54:00	28.15	15.52	25-Mar-14 13:54:00	295.10	2.15	20.86	20.79
25-Mar-14 13:55:00	27.84	15.49	25-Mar-14 13:55:00	295.10	2.16	21.29	20.81
25-Mar-14 13:56:00	27.55	15.47	25-Mar-14 13:56:00	295.10	2.18	20.87	20.75
25-Mar-14 13:57:00	27.25	15.45	25-Mar-14 13:57:00	295.10	2.17	21.37	20.80
25-Mar-14 13:58:00	26.95	15.45	25-Mar-14 13:58:00	295.10	2.15	21.06	20.79
25-Mar-14 13:59:00	26.47	15.44	25-Mar-14 13:59:00	295.10	2.16	21.30	20.85
25-Mar-14 14:00:00	26.70	15.46	25-Mar-14 14:00:00	295.10	2.16	20.99	20.84
25-Mar-14 14:01:00	26.38	15.42	25-Mar-14 14:01:00	295.10	2.15	21.14	20.87
25-Mar-14 14:02:00	26.31	15.42	25-Mar-14 14:02:00	295.10	2.16	21.19	20.80
25-Mar-14 14:03:00	26.23	15.40	25-Mar-14 14:03:00	295.10	2.15	21.19	20.81
25-Mar-14 14:04:00	26.16	15.38	25-Mar-14 14:04:00	295.10	2.16	21.06	20.84
25-Mar-14 14:05:00	26.22	15.38	25-Mar-14 14:05:00	295.10	2.16	21.14	20.87
25-Mar-14 14:06:00	26.26	15.39	25-Mar-14 14:06:00	295.10	2.15	21.19	20.80
25-Mar-14 14:07:00	26.34	15.41	25-Mar-14 14:07:00	295.10	2.16	21.19	20.81
25-Mar-14 14:08:00	26.41	15.42	25-Mar-14 14:08:00	295.10	2.16	21.05	20.81
25-Mar-14 14:09:00	26.42	15.42	25-Mar-14 14:09:00	295.10	2.16	21.05	20.72
25-Mar-14 14:10:00	26.35	15.41	25-Mar-14 14:10:00	295.10	2.16	21.26	20.75
25-Mar-14 14:11:00	26.27	15.39	25-Mar-14 14:11:00	295.10	2.15	21.26	20.80
25-Mar-14 14:12:00	26.20	15.38	25-Mar-14 14:12:00	295.10	2.16	21.08	20.87
25-Mar-14 14:13:00	26.26	15.39	25-Mar-14 14:13:00	295.10	2.16	21.25	20.85
25-Mar-14 14:14:00	26.50	15.42	25-Mar-14 14:14:00	295.10	2.16	21.36	20.85
25-Mar-14 14:15:00	26.04	15.43	25-Mar-14 14:15:00	295.10	2.16	21.18	20.83
25-Mar-14 14:16:00	26.45	15.43	25-Mar-14 14:16:00	295.10	2.15	21.33	20.75
25-Mar-14 14:17:00	26.53	15.43	25-Mar-14 14:17:00	295.10	2.14	21.03	20.85
25-Mar-14 14:18:00	26.53	15.43	25-Mar-14 14:18:00	295.10	2.14	20.86	20.87
25-Mar-14 14:19:00	26.53	15.43	25-Mar-14 14:19:00	295.10	2.15	21.38	20.72
25-Mar-14 14:20:00	26.53	15.43	25-Mar-14 14:20:00	295.10	2.15	20.91	20.70
25-Mar-14 14:21:00	26.53	15.43	25-Mar-14 14:21:00	295.10	2.17	21.33	20.86
25-Mar-14 14:22:00	26.53	15.43	25-Mar-14 14:22:00	295.10	2.15	21.27	20.73
25-Mar-14 14:23:00	26.53	15.43	25-Mar-14 14:23:00	295.10	2.14	21.06	20.85
25-Mar-14 14:24:00	26.53	15.43	25-Mar-14 14:24:00	295.10	2.14	21.30	20.75
Average Stack NOx, ppm (15% O2)	Average Stack CO, ppm (15% O2)	Average Stack O2 (%)	Average Duct Burner Gas Flow (MSCFH)	Average Turbine Gas Flow (MSCFH)	Average Steam Injection Rate (Tons)	Average Ammonia Injection (lb/hr)	Average Turbine Load (MW)
10.53	26.27	15.43	11.55	295.10	2.16	21.13	23.60



**EPA METHOD 20: MEASUREMENT  
SYSTEM PERFORMANCE TESTS**

**RESPONSE TIME**

DATE OF TEST... 3/25/14 ... PROBE LOCATION...  
 ANALYZER TYPE & Serial No., NO<sub>x</sub>: API 200 EH  
 CO: API 300 EM  
 O<sub>2</sub>: Servo Mex 1400

Span Gas Concentration/Analyzer Full Scale Setting:  
 NO<sub>x</sub>; Gas, ppmv: ... 11.4 ... Span setting, ppmv: 0-25  
 CO: Gas, ppmv: ... 19.6 ... Span setting, ppmv: 0-50  
 O<sub>2</sub>: Gas, %: ... 12.1 ... Span setting, %: 0-25

**UPSCALE TIME - Analyzer + Sampling System:**

Trial #	NO <sub>x</sub>	CO	O <sub>2</sub>	
1	<u>68.</u>	<u>76.</u>	<u>63.</u>	seconds.
2	<u>71.</u>	<u>78.</u>	<u>65.</u>	seconds.
3	<u>71.</u>	<u>78.</u>	<u>64.</u>	seconds.
Average Response:	<u>70.</u>	<u>77.</u>	<u>64.</u>	seconds.

**DOWNSCALE - Analyzer + Sampling System:**

Trial #	NO <sub>x</sub>	CO	O <sub>2</sub>	
1	<u>67.</u>	<u>78.</u>	<u>65.</u>	seconds.
2	<u>70.</u>	<u>77.</u>	<u>62.</u>	seconds.
3	<u>71.</u>	<u>80.</u>	<u>65.</u>	seconds.
Average Response:	<u>69.</u>	<u>78.</u>	<u>64.</u>	seconds.

Average System Response: ..... seconds.

Slower Average: ..... seconds.

<b>INSTRUMENT INFORMATION</b>
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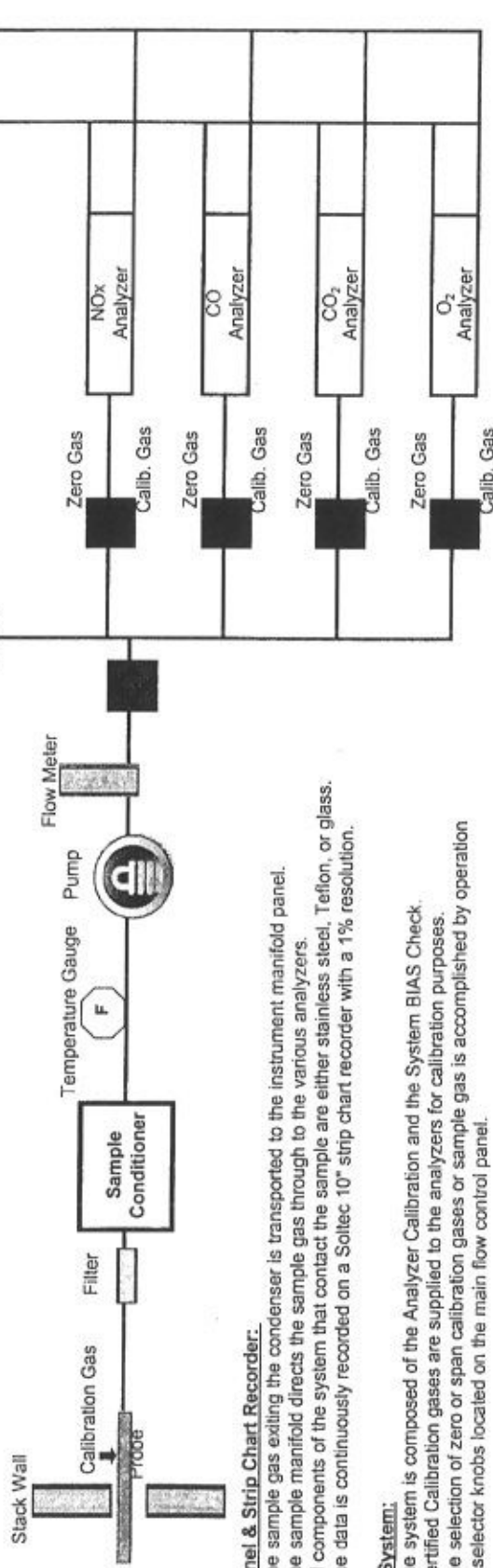
## CARB Method 100 – Sample Train Assembly

**Probe:**

1. AIRx Testing Services, Inc. uses a stainless steel sampling probe.
2. The probe is connected to the sample conditioner using a heated (if necessary) Teflon sampling line.

**Sample Conditioner (Condenser System):**

1. The sample conditioner consists of a moisture knock-out bottle immersed in an ice bath.
2. All parts of the conditioner exposed to the sample are either glass, stainless steel, or Teflon.
3. The sample conditioner is setup so that the sample gas is not bubbled through the condensate.
4. A temperature gauge is used to determine the temperature of the condenser outlet.
5. Capable of reducing sample gas temperature to 15 °C (60 °F).



**Manifold Panel & Strip Chart Recorder:**

1. The sample gas exiting the condenser is transported to the instrument manifold panel.
2. The sample manifold directs the sample gas through to the various analyzers.
3. All components of the system that contact the sample are either stainless steel, Teflon, or glass.
4. The data is continuously recorded on a Soltec 10" strip chart recorder with a 1% resolution.

**Calibration System:**

1. The system is composed of the Analyzer Calibration and the System BIAS Check.
2. Certified Calibration gases are supplied to the analyzers for calibration purposes.
3. The selection of zero or span calibration gases or sample gas is accomplished by operation of selector knobs located on the main flow control panel.

**Nitrogen Oxides.** – Chemiluminescent Analyzer: Based on the chemiluminescent reaction of NO and ozone to form NO<sub>2</sub> in an excited state. Light emission is monitored through an optical filter by a high sensitivity photomultiplier tube, the output of which is electronically processed so it is linearly proportional to the NO concentration. The output is in units of ppmv.

**Carbon Monoxide** – Non-Dispersive Infrared (NDIR) Analyzer: Radiation from an infrared source is passed through a narrow band-pass filter and a multiple optical pass sample cell where absorption by the sample gas occurs. The infrared radiation exits the sample cell and falls on a solid state infrared detector. The output is in units of ppmv.

**Oxygen** – Electrochemical Analyzer: Oxygen in the flue gas sample diffuses through a Teflon membrane and is reduced on the surface of the cathode. A corresponding oxidation occurs at the anode and an electric current proportional to the concentration of oxygen is produced. The output is in units of percent O<sub>2</sub> by volume.

**Carbon Dioxide** – Non Dispersive Infrared (NDIR) Analyzer: The instrument measures the differential in infrared energy absorbed from energy beams passed through a reference cell (containing a gas selected to have minimal absorption of infrared energy in the wavelength absorbed by CO<sub>2</sub>) and a sample cell through which the sample gas flows continuously. The output is in units of percent CO<sub>2</sub> by volume.

**SOURCE EMISSION INSTRUMENTATION LIST**  
2/16/2011

**OXIDES OF NITROGEN**

<p><b>Unit No. - 1:</b>          Manufacturer: API          Model No.: 200 EH          Serial No.: 233          Method: Chemiluminescence          Range (ppmv) 0-5000</p>	<p><b>Unit No. - 6:</b>          Manufacturer: Thermo Environmental (TECO)          Model No.: 10AR          Serial No.: 26886-227          Method: Chemiluminescence          Range (ppmv) 0-2.5, 10, 25, 100, 250, 1000, 2500, 10000</p>
<p><b>Unit No. - 2:</b>          Manufacturer: API          Model No.: 200 EH          Serial No.: 234          Method: Chemiluminescence          Range (ppmv) 0-5000</p>	<p><b>Unit No. - 7:</b>          Manufacturer: Thermo Environmental (TECO)          Model No.: 10AR          Serial No.: 25559-221          Method: Chemiluminescence          Range (ppmv) 0-2.5, 10, 25, 100, 250, 1000, 2500, 10000</p>
<p><b>Unit No. - 3:</b>          Manufacturer: API          Model No.: 200 EH          Serial No.: 109          Method: Chemiluminescence          Range (ppmv) 0-5000</p>	<p><b>Unit No. - 8:</b>          Manufacturer: Thermo Environmental (TECO)          Model No.: 10AR          Serial No.: 38586-258          Method: Chemiluminescence          Range (ppmv) 0-2.5, 10, 25, 100, 250, 1000, 2500, 10000</p>
<p><b>Unit No. - 4:</b>          Manufacturer: Thermo Environmental (TECO)          Model No.: 10          Serial No.: 24697-216          Method: Chemiluminescence          Range (ppmv) 0-2.5, 10, 25, 100, 250, 1000, 2500, 10000</p>	
<p><b>Unit No. - 5:</b>          Manufacturer: Thermo Environmental (TECO)          Model No.: 10AR          Serial No.: 26840-227          Method: Chemiluminescence          Range (ppmv) 0-2.5, 10, 25, 100, 250, 1000, 2500, 10000</p>	



**SOURCE EMISSION INSTRUMENTATION LIST**  
**2/16/2011**

OXIDES OF NITROGEN (cont)

<b>Unit No. - 4:</b>	
Manufacturer:	API
Model No.:	200 EH
Serial No.:	442
Method:	Chemiluminescence
Range (ppmv)	0-5000
<b>Unit No. - 5:</b>	
Manufacturer:	API
Model No.:	200 EH
Serial No.:	441
Method:	Chemiluminescence
Range (ppmv)	0-5000
<b>Unit No. - 6:</b>	
Manufacturer:	API
Model No.:	200 A
Serial No.:	1013
Method:	Chemiluminescence
Range (ppmv)	0-50

**X AIR X TESTING**

Range (ppmv)	0-5, 10, 25, 50, 100, 250, 500, 1000, 2500, 5000	Range (ppmv)	0-50, 100, 200, 500, 1000, 2000, 5000, 10000, 20000, 50000
<b>Unit No. - 6:</b>		<b>Unit No. - 7:</b>	
Manufacturer:	Thermo Environmental (TECO)	Manufacturer:	Siemens
Model No.:	48H	Model No.:	Ultramat 21p
Serial No.:	29031-233	Serial No.:	AO4-254
Method:	NDIR/GFC	Method:	NDIR
Range (ppmv)	0-50, 100, 200, 500, 1000, 2000, 5000, 10000, 20000, 50000	Range (ppmv)	0-300
<b>Unit No. - 10:</b>		<b>Unit No. - 11:</b>	
Manufacturer:	Thermo Environmental (TECO)	Manufacturer:	Thermo Environmental (TECO)
Model No.:	48H	Model No.:	48H
Serial No.:	38391-257	Serial No.:	35226-249
Method:	NDIR/GFC	Method:	NDIR/GFC
Range (ppmv)	0-50, 100, 200, 500, 1000, 2000, 5000, 10000, 20000, 50000	Range (ppmv)	0-50, 100, 200, 500, 1000, 2000, 5000, 10000, 20000, 50000
<b>Unit No - 13:</b>		<b>Unit No - 14:</b>	

**SOURCE EMISSION INSTRUMENTATION LIST**  
2/16/2011

OXYGEN

<b>Unit No. - 5:</b>	
Manufacturer:	Teledyne
Model No.:	320-AX
Serial No.:	108743
Method:	Electrochemical
Range (%)	0-5, 10, 25
<b>Unit No. - 7:</b>	
Manufacturer:	Teledyne
Model No.:	320-AX
Serial No.:	108742
Method:	Electrochemical
Range (%)	0-5, 10, 25
<b>Unit No. - 9:</b>	
Manufacturer:	Servomex
Model No.:	1400
Serial No.:	01420/B701/730
Method:	Paramagnetic
Range (%)	0-25, 100
<b>Unit No. - 10:</b>	
Manufacturer:	Servomex
Model No.:	1400
Serial No.:	01420/B701/747
Method:	Paramagnetic
Range (%)	0-25, 100
<b>Unit No. - 11:</b>	
Manufacturer:	Teledyne
Model No.:	320-A
Serial No.:	111211
Method:	Electrochemical
Range (%)	0-5, 10, 25

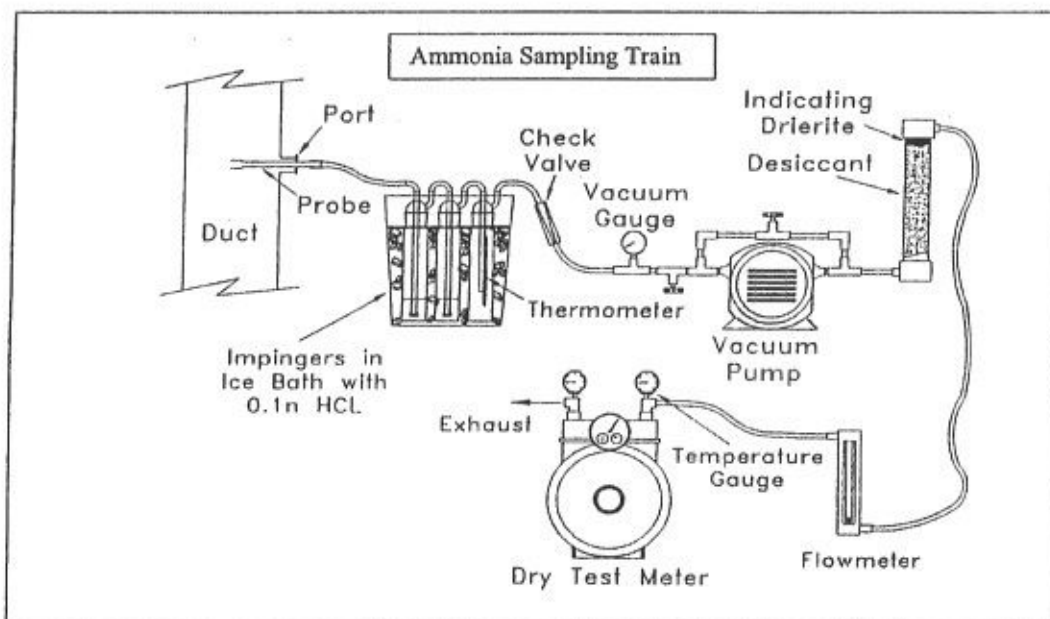


## BAAQMD Method ST-1B / Ammonia Integrated Sampling

**Principle:** A gas sample is drawn through a solution of 0.1N hydrochloric acid which absorbs the ammonia.

### Pre-Test Procedures:

- ❖ Add 100 ml of 0.1N to each of two impingers; retain 100 ml of the HCl to analyze as a blank
- ❖ Leak-test sampling train by starting the pump, plugging the probe, and adjusting the pump inlet vacuum to 10 inches Hg. The leak rate must not exceed 0.6 liter/min (0.02 CFM). Release plug, stop pump.
- ❖ Record initial "dry test meter" reading and barometric pressure.
- ❖ In the absence of stratification, sample at single point, otherwise select sampling traverse points.



### Sampling Procedure:

- ❖ Each test run shall be of **30 minute** duration or 90% of the batch time, whichever is less
- ❖ Position probe at the sampling point and start the pump
- ❖ Sample at constant rate of **14.3 liter/min (0.5 CFM)**, using rotameter to establish initial rate only
- ❖ Record "dry test meter" volume and temperature and "impinger outlet" temperature at 5-min intervals
- ❖ Maintain impinger temperature at 7°C (45°F) or less by adding ice as necessary
- ❖ At the conclusion of each run, stop pump, remove probe from stack and record final reading
- ❖ Point probe upward and purge sample train with ambient air

**Analysis:** Individually analyze the hydrochloric acid solutions and the blank for total ammonia content.

### Calculations:

Standard sample volume	Ammonia Concentration
$V_o = (17.71)V_m P_b / T_m$	$C = 5.02 \times 10^4 W / V_o$
<p><u>Where:</u>  <math>V_o</math> = Corrected sample volume to std conditions;  <math>T_m</math> = Average run meter temperature (°R);  <math>V_m</math> = Uncorrected meter volume (ft<sup>3</sup>);  <math>P_b</math> = Barometric pressure (inches Hg);                      17.71 = Constant correcting to 70°F &amp; 29.92 in.Hg.</p>	<p><u>Where:</u>  <math>C</math> = Ammonia concentration, ppmv on a dry basis;  <math>W</math> = Total weight of ammonia in the impinger catch, for each run, (g);                      5.02 x 10<sup>4</sup> = Constant derived from the MW and correcting to standard conditions.</p>

<b>QUALITY ASSURANCE</b>
--------------------------







**AIR LIQUIDE**

Air Liquide America  
Specialty Gases LLC



# RATA CLASS

*Dual-Analyzed Calibration Standard*

8832 DICE ROAD, SANTA FE SPRINGS, CA 90670-2516

Phone: 800-323-2212

Fax: 562-464-5262

## CERTIFICATE OF ACCURACY: EPA Protocol Gas

**Assay Laboratory - PGVP Vendor ID: A52013**

AIR LIQUIDE AMERICA SPECIALTY GASES LLC  
8832 DICE ROAD  
SANTA FE SPRINGS, CA 90670-2516

P.O. No.: VEN-8/21/13-RY  
Document #: 52017316-001

**Customer**

AIRX TESTING SERVICES, INC.

RYAN YANAGIHARA  
2472 EASTMAN AVE.  
UNIT # 34  
VENTURA CA 93003  
US

### ANALYTICAL INFORMATION Gas Type : NO,BALN

This certification was performed according to EPA Traceability Protocol For Assay & Certification of Gaseous Calibration Standards; Procedure G-1; September, 1997.

**Cylinder Number:** AAL2002      **Certification Date:** 22Apr2013      **Exp. Date:** 23Oct2016  
**Cylinder Pressure\*\*\*:** 2000 PSIG      **Batch No:** SBO0077049

COMPONENT	CERTIFIED CONCENTRATION (Moles)	ACCURACY**	TRACEABILITY
NITRIC OXIDE	19.7 PPM	+/- 1%	Direct NIST and VSL
NITROGEN - OXYGEN FREE	BALANCE		
TOTAL OXIDES OF NITROGEN	19.8 PPM		Reference Value Only

\*\*\* Do not use when cylinder pressure is below 150 psig.

\*\* Analytical accuracy is based on the requirements of EPA Protocol Procedure G1, September 1997.

### REFERENCE STANDARD

TYPE/SRM NO.	EXPIRATION DATE	CYLINDER NUMBER	CONCENTRATION	COMPONENT
NTRM 2629	31May2016	KAL004237	20.34 PPM	NITRIC OXIDE

### INSTRUMENTATION

INSTRUMENT/MODEL/SERIAL#	DATE LAST CALIBRATED	ANALYTICAL PRINCIPLE
ECOPHYSICS/CLD 84 M/84M0405	15Apr2013	CHEMILUMINESCENCE

### ANALYZER READINGS

(Z = Zero Gas R = Reference Gas T = Test Gas r = Correlation Coefficient)

#### First Triad Analysis

**NITRIC OXIDE**

Date: 15Apr2013      Response Unit: PPM

Z1 = 0.00000	R1 = 20.70000	T1 = 20.08000
R2 = 20.71000	Z2 = 0.00000	T2 = 20.04000
Z3 = 0.00000	T3 = 20.02000	R3 = 20.68000
Avg. Concentration: 19.89 PPM		

#### Second Triad Analysis

Date: 22Apr2013      Response Unit: PPM

Z1 = 0.00000	R1 = 20.68000	T1 = 20.05000
R2 = 20.65000	Z2 = 0.00000	T2 = 20.03000
Z3 = 0.00000	T3 = 20.02000	R3 = 20.66000
Avg. Concentration: 19.72 PPM		

#### Calibration Curve

Concentration = A + Bx + Cx<sup>2</sup> + Dx<sup>3</sup> + Ex<sup>4</sup>  
r = 0.999986759

Constants:      A = 0.056605996  
B = 0.982273841      C = 0  
D = 0      E = 0

APPROVED BY: \_\_\_\_\_

MT



Attachment to 6.a. 74.15N3-0157

Condition No.	Response
1	Pursuant to Rule 74.15.C.3, the Rule 74.15.B.1 requirement does not apply when the unit operated during breakdowns which were reported under Rule 32. In addition, B.1 does not apply because the unit burned less than 9,000,000,000 Btu/yr.
2	When combined with emissions from the Cogen unit(s), emissions do not exceed 50 tons of NOx per year and 97.66 tons of CO per year (see table below).
3	Pursuant to Rule 74.14.B.2.c, the unit was not tuned during this compliance period because it operated less than 10 days during this compliance period.
4	Rule 74.15.D.2 requires tune-up reports to be submitted to the District. No tune-ups were conducted during this period, so no tune-up reports were provided to the District.
5	Records of hours of operation and resulting emissions are presented in the table below.

Month-Year	Monthly		Rolling 12-Months		Emissions								
	Natural Gas (scf)	Uptime (hours)	Natural Gas (scf)	Uptime (hours)	Capacity Factor (%)	Nebraska Emissions NOx (tons)	CO (tons)	Cogen Emissions NOx (tons)	CO (tons)	Total Emissions NOx (tons)	CO (tons)	Rolling 12 Months NOx (tons)	CO (tons)
May-12	3,918	1.9	3,918	2	0.000%	0.009	0.00114	3.91	9.00	3.92	9.00	39.73	53.15
June-12	0	0	3,918	2	0.000%	0	0	3.82	5.46	3.82	5.46	39.79	54.53
July-12	0	0	3,918	2	0.000%	0	0	4.02	3.99	4.02	3.99	40.58	54.69
August-12	0	0	3,918	2	0.000%	0	0	4.00	4.29	4.00	4.29	40.83	54.80
September-12	0	0	3,918	2	0.000%	0	0	3.97	4.40	3.97	4.40	41.81	55.93
October-12	104,676	2.2	108,594	4	0.012%	0.011	0.0013	3.92	4.24	3.93	4.24	42.63	56.83
November-12	4,280,571	73	4,389,165	77	0.476%	0.350	0.044	3.75	3.69	4.10	3.73	43.87	57.13
December-12	786,206	14	5,175,372	91	0.561%	0.067	0.0084	3.90	5.91	3.97	5.92	46.30	61.44
January-13	0	0	5,175,372	91	0.561%	0	0	3.86	5.26	3.86	5.26	46.30	62.43
February-13	0	0	5,175,372	91	0.561%	0	0	2.75	3.69	2.75	3.69	45.33	61.30
March-13	0	0	5,175,372	91	0.561%	0	0	4.02	5.13	4.02	5.13	46.01	62.14
April-13	0	0	5,175,372	91	0.561%	0	0	3.82	4.43	3.82	4.43	46.18	59.54
May-13	4,180,459	70.75	9,351,913	160	1.013%	0.340	0.0425	3.68	4.09	4.02	4.13	46.28	54.68
June-13	0	0	9,351,913	160	1.013%	0	0	3.81	5.15	3.81	5.15	46.27	54.37
July-13	0	0	9,351,913	160	1.013%	0	0	3.90	6.09	3.90	6.09	46.15	56.47
August-13	0	0	9,351,913	160	1.013%	0	0	3.90	5.30	3.90	5.30	46.05	57.48
September-13	0	0	9,351,913	160	1.013%	0	0	3.93	6.54	3.93	6.54	46.01	59.62
October-13	3,004,121	53.72	12,251,358	211	1.327%	0.258	0.0322	3.86	5.32	4.12	5.35	46.20	60.73
November-13	129,180	4.7	8,095,966	143	0.878%	0.023	0.0028	3.79	5.99	3.81	5.99	45.91	62.99
December-13	0	0	7,313,760	129	0.792%	0	0	3.64	5.14	3.64	5.14	45.58	62.21
January-14	0	0	7,313,760	129	0.792%	0	0	3.25	4.44	3.25	4.44	44.97	61.39
February-14	0	0	7,313,760	129	0.792%	0	0	3.45	4.43	3.45	4.43	45.67	62.13
March-14	0	0	7,313,760	129	0.792%	0	0	3.42	5.28	3.42	5.28	45.07	62.28
<b>Maximums:</b>	<b>4,180,459</b>	<b>70.75</b>	<b>12,251,358</b>	<b>211</b>	<b>1.327%</b>	<b>0.340</b>	<b>0.042</b>	<b>3.93</b>	<b>6.54</b>	<b>4.12</b>	<b>6.54</b>	<b>46.28</b>	<b>62.99</b>

Sample Calculation:

Capacity Factor = Annual Fuel Usage \* HHV natural gas / (Equipment rating \* Hours/year)

Capacity Factor = (10 MMcf/yr) \* (1,030 BTU/cf) / ((108 MMBtu/hr) \* (8,760 hr/yr))

Capacity Factor = 1.09%

Tune-up: None this year. Operated only 9 days.

Attachment to 7.b. PO0157PC1

Material Name:	Power Back		3M Stainless Steel Polish		Electron LVC Aerosol		Sprayon All-Purpose Silicone Lube		TKX All Purpose Penetrant, Lubricant,		WD-40 Aerosol		Brakleen Brake Parts Cleaner-aerosol		Chain & Wire Rope Aerosol		LST Penetrant (LPS) Aerosol	
	(containe rs/mo)	(gal/yr)	(containe rs/mo)	(gal/yr)	(containe rs/mo)	(gal/yr)	(containe rs/mo)	(gal/yr)	(containe rs/mo)	(gal/yr)	(containe rs/mo)	(gal/yr)	(containe rs/mo)	(gal/yr)	(containe rs/mo)	(gal/yr)	(containe rs/mo)	(gal/yr)
Container size (gal):	1		1		0.141		0.125		0.125		0.086		0.109		0.086		0.086	
VOC content (lb/gal):	0.14		2.8		0.818		5.1		4.9		2.6		5.5		2.04		0	
HHC content (lb/gal):	0		0		0		0		0		0		0		0		0	
May-12	-	38	-	2	-	2.39	6	1.50	-	5.00	-	2.23	0.5	0.11	-	-	-	-
Jun-12	6	38	-	2	-	2.39	-	1.50	-	4.25	-	1.72	0.5	0.16	-	-	-	-
Jul-12	7	37	2	4	-	2.39	6	2.25	-	4.25	12.00	2.41	0.5	0.22	12.00	0.086	0.086	
Aug-12	-	32	-	4	1	2.53	-	2.25	-	3.75	12.00	3.44	0.5	0.27	6.00	2.6	2.04	
Sep-12	8	33	-	4	-	2.53	-	2.25	-	3.00	6.00	3.61	0.5	0.33	6.00	0	0	
Oct-12	-	33	-	4	-	1.13	-	2.25	-	2.25	6.00	3.09	0.5	0.38	6.00	0	0	
Nov-12	-	33	-	2	-	0.70	6	3.00	-	2.25	6.00	3.61	0.5	0.44	6.00	0	0	
Dec-12	5	38	-	2	-	0.70	-	2.25	-	1.50	6.00	4.13	0.5	0.49	6.00	0	0	
Jan-13	-	32	-	2	2	0.56	-	2.25	-	0.75	4.00	4.47	0.5	0.55	4.00	0	0	
Feb-13	5	37	-	2	2	0.84	-	2.25	6	1.50	4.00	4.81	0.5	0.60	4.00	0	0	
Mar-13	-	31	-	2	-	0.70	-	2.25	6	1.50	4.00	5.16	0.5	0.66	4.00	0	0	
Apr-13	0	31	0	2	2	0.98	0	2.25	3	1.88	4.00	5.50	0.5	0.66	4.00	0	0	
May-13	0	31	0	2	12	2.67	4	2.00	5	2.50	6.00	6.02	0.5	0.66	6.00	2	0.17	
Jun-13	7	32	0	2	0	2.67	0	2.00	1	2.63	1.00	6.10	0.5	0.66	1.00	4	0.17	
Jul-13	6	31	0	0	0	2.67	2	1.50	0	2.63	13.00	6.19	0.5	0.66	13.00	4	0.26	
Aug-13	5	36	0	0	8	3.66	0	1.50	11	4.00	8.00	5.84	0.5	0.66	8.00	1	0.77	
Sep-13	0	28	0	0	0	3.66	0	1.50	3	4.38	3.00	5.59	0.5	0.66	3.00	4	1.03	
Oct-13	3	31	0	0	3	4.08	0	1.50	3	4.75	11.00	6.02	0.5	0.66	11.00	2	1.29	
Nov-13	4	35	0	0	0	4.08	3	1.13	1	4.88	3.00	5.76	0.5	0.66	3.00	4	1.98	
Dec-13	4	34	0	0	1	4.22	3	1.50	2	5.13	7.00	5.84	0.5	0.66	7.00	4	2.58	
Jan-14	4	38	0	0	1	4.08	1	1.63	1	5.25	3.00	5.76	0.5	0.66	3.00	0	3.18	
Feb-14	4	37	0	0	5	4.50	0	1.63	0	4.50	1.00	5.50	0.5	0.66	1.00	0	4.04	
Mar-14	4	41	0	0	0	4.50	1	1.75	2	4.00	7.00	5.76	0.5	0.66	7.00	0	4.30	
Rolling 12-Month Max.:	7	41	0	2	12	4.50	4	2.25	11	5.25	13	6.19	0.5	0.66	13	4	13	5.41
VOC Emissions (tpy):	0.0029		0.0028		0.0018		0.0057		0.013		0.0080		0.0018		0.0015		0.0000	
HHC Emissions (tpy):	0		0		0		0		0		0		0		0		0	

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



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LPS® LST

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**Section 1 • Product and Company Identification**

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**Product Name:** LPS® LST

**Part Number(s):** 01916 (aerosol), 01928, 01905, 01955, C01916 (aerosol), C01928, C01905, C01955

**Chemical Name:** Petroleum Distillates

**Product Use:** An industrial penetrant designed to penetrate rust and loosen seized bolts and other equipment damaged by corrosion.

**Manufacturer Information:** LPS Laboratories, 4647 Hugh Howell Road, Tucker, GA, USA 30084  
**TEL:** USA & Canada: 1 800 241-8334  
Outside USA and Canada: +1 770 243-8800  
**FAX:** USA & Canada: 1 800 543-1563  
Outside USA and Canada: +1 770 243-8899

**Emergency Telephone Number:** Chemtrec: USA & Canada: 1 800 424-9300  
Outside USA and Canada: +1 703 527-3887

**Website:** <http://www.lpslabs.com>

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**Section 2 • Hazards Identification**

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*This material is considered hazardous by the OSHA Hazard Communication Standard (29 CFR 1910.1200). This product has been classified in accordance with the hazard criteria of the Controlled Products Regulations and the MSDS contains all the information required by the Controlled Products Regulations.*

**Emergency Overview:**

**Aerosol:** DANGER: Flammable. Contents under pressure. Harmful or fatal if swallowed.

**Bulk:** DANGER: Combustible. Keep away from heat and flame. Harmful or fatal if swallowed.

**Primary route(s) of entry:** Skin and eye contact. Inhalation.

**Potential Acute Health Effects:**

**Eyes:** Irritating to eyes.

**Skin:** Repeated exposure may cause skin dryness or cracking.

**Inhalation:** Excessive inhalation of vapors can cause irritation of the respiratory tract, nausea, dizziness or headache.

**Ingestion:** Product has a low order of acute oral toxicity, but ingestion of large quantities may cause nausea, vomiting, and gastrointestinal irritation. May cause injury if aspirated into lungs.

**Potential Chronic Health Effects:**

**Carcinogenic Effects:** NTP: No IARC: No OSHA: No ACGIH: No

**Mutagenic Effects:** None

**Teratogenic Effects:** None

**Target Organs:** None



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### Medical conditions aggravated by exposure:

Persons with pre-existing central nervous system (CNS) disease, neurological conditions, skin disorders, chronic respiratory diseases, or impaired liver or kidney function should avoid exposure.

### Signs and Symptoms

Stinging in eyes. Repeated or prolonged skin contact can cause redness, irritation, and scaling of the skin (dermatitis). Breathing of high vapor concentrations may cause headaches, stupor, irritation of throat and eyes, and kidney effects.

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### Section 3 • Composition / Information on Ingredients

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Component	CASRN	Weight Percent
Distillates (Petroleum), Hydrotreated Light	64742-47-8	80 - 90%
Distillates (Petroleum), Hydrotreated Middle	64742-46-7	10 - 20%
Carbon Dioxide (aerosol only)	124-38-9	1 - 5%

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### Section 4 • First Aid Measures

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<b>Eyes:</b>	Check for and remove contact lenses. If irritation or redness develops, flush eyes with cool, clean, low pressure water for at least 15 minutes. Hold eyelids apart to ensure complete irrigation of the eye and eyelid tissue. DO NOT use eye ointment. Seek medical attention immediately.
<b>Skin:</b>	Remove contaminated shoes and clothing. Clean affected area thoroughly with mild soap and water. DO NOT use ointments. Seek medical attention if irritation persists.
<b>Inhalation:</b>	Immediately move victim to fresh air. If victim is not breathing, immediately begin rescue breathing. If heart has stopped, immediately begin cardiopulmonary resuscitation (CPR). If breathing is difficult, seek medical attention immediately.
<b>Ingestion:</b>	DO NOT induce vomiting unless directed to do so by medical personnel. Never give anything by mouth to an unconscious person. If spontaneous vomiting is about to occur, place victim's head below knees. If victim is drowsy or unconscious, place on the left side with head down. DO NOT leave victim unattended. Seek medical attention immediately.



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**Section 5 • Fire Fighting Measures**

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**Products of Combustion:** Carbon monoxide and carbon dioxide.

**General Fire Hazards:** High heat will cause product to boil, evolving vapor that could cause explosive rupture of closed containers.

**Firefighting media:** SMALL FIRE: Use DRY chemical powder.  
LARGE FIRE: Use CO2, water spray, fog or foam. Cool containing vessels with water jet in order to prevent pressure build-up, auto-ignition or explosions.

**Sensitivity to Impact:** None                      **Sensitivity to Static Discharge:** None

**Protection Clothing (Fire):** Wear protective clothing and equipment suitable for the surrounding fire, including helmet, face mask, and self-contained breathing apparatus.

**Special Remarks on Explosion Hazards:**

High heat will cause product to boil, evolving vapor that could cause explosive rupture of closed containers. Aerosols may explode upon heating, spread fire and overcome sprinkler systems.

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**Section 6 • Accidental Release Measures**

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**Containment Procedures:**    **Small Spill and Leak:**    Absorb with an inert material and dispose of properly.

**Large Spill and Leak:**    Secure the area and control access. Dike far ahead of a liquid spill to ensure complete collection. Pick up free liquid for disposal using absorbent pads, sand, or other inert non-combustible absorbent materials. Place into appropriate waste containers for later disposal.

**Clean-Up Procedures:**        Contain and recover spilled material when possible.

**Evacuation Procedures:**      Ventilate area of leak or spill. Keep unnecessary and unprotected people away.

**Special Procedures:**            Remove all sources of ignition. Ventilate area. Wear personal protective equipment during cleanup.

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**Section 7 • Handling and Storage**

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**Handling:**                      DO NOT spray into or around ignition sources. DO NOT allow material to come in contact with eyes or skin. Wear appropriate protective equipment during handling. Keep container closed. Avoid breathing vapors or mists. Use only with adequate ventilation. Wash thoroughly after handling.

**Storage:**                        Keep container in a cool, well-ventilated area. Avoid all sources of ignition (spark or flame). Store between 40°F and 120°F (4.4°C and 49°C).

**Precautions to be taken in handling and storage:**

Store aerosols as Level 3 Aerosol (NFPA 30B). Store all materials in a dry, well-ventilated area. Avoid breathing vapors.





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Section 8 • Exposure Controls / Personal Protection

Exposure Guidelines:

Component	CASRN	OSHA	ACGIH	NIOSH	Supplier
Distillates (Petroleum), Hydrotreated Light	64742-47-8	5 mg/m3 (oil mist) PEL	5 mg/m3 (oil mist) TLV 10 mg/m3 (oil mist) STEL	5 mg/m3 (oil mist) TWA 10 mg/m3 (oil mist) STEL	100 ppm TWA 525 mg/m3 TWA
Distillates (Petroleum), Hydrotreated Middle	64742-46-7	5 mg/m3 (oil mist) PEL	5 mg/m3 (oil mist) TLV 10 mg/m3 (oil mist) STEL	5 mg/m3 (oil mist) TWA 10 mg/m3 (oil mist) STEL	None reported
Carbon Dioxide (aerosol only)	124-38-9	5000 ppm PEL	5000 ppm TLV 30000 ppm STEL	5000 ppm TWA 30000 ppm STEL	None reported

**Engineering Controls:** Provide general and/or local exhaust ventilation to keep exposures below the exposure guidelines listed above.

**Personal protective equipment**

**Eye protection:** Safety glasses with side shields conforming to appropriate regulations. Eye wash fountain and emergency shower facilities are recommended.

**Hand protection:** Normally no hand protection is required; however, if product will be sprayed for an extended period, "overspray" onto skin may occur. If so, wear chemical resistant gloves conforming to appropriate regulations. Please observe the instructions regarding permeability and breakthrough time that are provided by the supplier of the gloves.

**Respiratory protection:** Typical use of this product under normal conditions does not require the use of respiratory protection. If airborne concentrations are above the applicable exposure limits (listed above), use NIOSH approved respiratory protection (i.e. organic vapor cartridge).

**General Hygiene Considerations:** Wash thoroughly after handling. Have eye-wash facilities immediately available.



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Section 9 • Physical and Chemical Properties

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<b>Appearance:</b>	Liquid	<b>Color:</b>	Clear
<b>Odor:</b>	Vanilla	<b>Evaporation Rate:</b>	< 0.7 (BuAc = 1)
<b>Solubility Description:</b>	< 0.1% in water	<b>Flash Point:</b>	79°C (175°F) - dispensed liquid
<b>Boiling Point:</b>	195°C (383°F)	<b>Flash Point Method:</b>	Tag-Closed Cup
<b>Specific Gravity (H2O=1):</b>	0.79 - 0.81 @ 20°C	<b>Decomposition Temperature:</b>	Not established
<b>Vapor Density (air = 1):</b>	4.7	<b>Auto ignition temperature:</b>	Not established
<b>Vapor Pressure:</b>	< 0.1 mm Hg @ 20°C	<b>Flammable limits (estimated):</b>	LOWER: 0.6% UPPER: 7.0%
<b>Rule 1171 PPc:</b>	Not established	<b>Partition Coefficient (octanol/water):</b>	< 1
<b>V.O.C. Content:</b>	Aerosol: 0% per State & Federal Consumer Product Regulations Bulk: 0% per State & Federal Consumer Product Regulations	<b>Odor Threshold:</b>	Not established
<b>Melting Point:</b>	Not established	<b>Viscosity:</b>	Not established
<b>pH:</b>	Not applicable	<b>Volatiles:</b>	96 - 99%
<b>Heat of combustion:</b>	Aerosol: > 30 kJ/g Bulk: > 30 kJ/g		

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Section 10 • Stability and Reactivity

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<b>Chemical Stability:</b>	Product is stable under recommended storage conditions.
<b>Conditions to Avoid:</b>	Keep away from heat and ignition sources.
<b>Incompatibility:</b>	Reactive or incompatible with oxidizing agents.
<b>Hazardous Decomposition:</b>	Combustion will generate smoke, possibly thick and choking, resulting in zero visibility and combustion products include carbon monoxide and carbon dioxide.
<b>Hazardous Polymerization:</b>	Will not occur.



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Section 11 • Toxicological Information

Acute and Chronic Toxicity

A: General Product Information

An acute toxicity study of this product has not been conducted. Information given in this section relates only to individual constituents contained in this preparation.

B: Component Analysis

Component	CASRN	LC-50	LD-50
Distillates (Petroleum), Hydrotreated Light	64742-47-8	> 6.8 mg/L*	> 5 g/kg*
Distillates (Petroleum), Hydrotreated Middle	64742-46-7	Not established	Not established
Carbon Dioxide (aerosol only)	124-38-9	470000 ppm / rat / 30 minutes	Not appropriate

\* Supplier Data

Section 12 • Ecological Information

**Mobility:** Semi-volatile. Readily absorbed into soil. **Persistence / Degradability:** Only slightly biodegradable

**Bioaccumulative potential:** No bioaccumulation potential **Other adverse effects:** None known

Ecological studies have not been conducted for this product. The following information is available for component(s) of this product.

Ecotoxicity

Effects on Organisms	Component	CASRN	Test	Species	Results
Acute Toxicity on Fishes	Distillates (Petroleum), Hydrotreated Light	64742-47-8	96-hr LC50	Oncorhynchus Mykiss	3,200 µg/L*
Acute Toxicity on Daphnia	No data available				
Bacterial Inhibition					
Growth inhibition of algae					
Bioaccumulation in fish					

\* Supplier Data

For the 64742-47-8 component, no toxicity has been observed in water due to extremely low water solubility. However, hydrocarbon and petroleum distillates are potentially toxic to freshwater and saltwater ecosystems. If material is spilled on soil, some potential toxic effects could occur before biodegradation could remove material.

If spilled, the 64742-46-7 constituent may kill grasses and small plants by interfering with transpiration. Spilled material may coat gill structures of fish resulting in suffocation if spilled in shallow, running water. This product may be toxic to amphibians by preventing dermal respiration. This product may also cause gastrointestinal distress to birds and mammals through ingestion. Biodegradation of this product is possible within 90 to 120 days in aerobic environments at temperatures above 21°C.



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**Section 13 • Disposal Considerations**

**Waste Status:** In its purchased form, non-aerosol material does not meet the definition of a RCRA hazardous waste. Aerosol products, if depressurized and emptied to less than 1 inch (2.54 cm) of fluid contents are classified as non-hazardous waste under 40 CFR 261.7 (U.S.). However, if disposed of in its received form, an aerosol carries the waste code D003. (U.S.).

**Disposal:** Waste must be disposed of in accordance with any and all applicable environmental control rules and/or regulations.

**Note:** Chemical additions to, processing of, or otherwise altering this material may make this waste management information inaccurate, incomplete, or otherwise inappropriate. Furthermore, state and local waste disposal requirements may be more restrictive than federal laws and regulations.

**Section 14 • Transport Information**

Aerosol

D.O.T. Ground	Shipping Name:	Consumer Commodity	UN No.:	NA
	Hazard Class:	ORM-D	Technical Name:	NA
	Subclass:	NA	Hazard Label:	ORM-D Already on box
	Packing Group:	NA		
Road/Rail - ADR/RID	UN No.:	1950	ADR Class:	2
	Packing Group:	NA	Classification Code:	5F
	Name and description:	AEROSOLS, flammable	Hazard ID No.:	NA
	Labeling:	2.1	Technical Name:	NA
IMDG-IMO	UN No.:	1950	Class:	2
	Shipping Name:	Aerosols	Subsidiary Risk:	2.1
	Labeling:	NA	Packing Group:	NA
	Packing Instructions:	P003, LP02	EmS:	F-D, S-U
	Marine pollutant:	No	Technical Name:	NA
IATA - ICAO:	UN No.:	1950	Class:	2.1
	Shipping Name:	Aerosols, flammable	Subclass:	NA
	Packing Instructions:	203, Y203 (Ltd. Qty.)	Packing Group:	NA
	Labeling:	Flammable Gas	Technical Name:	NA

Non-aerosol versions of this product are not regulated by any mode of transportation.

The preceding information is subject to change and must be verified prior to shipment. It is the responsibility of anyone offering hazardous materials for shipment to ensure compliance with all applicable regulations.



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Section 15 • Regulatory Information

U.S. Federal Regulations

RCRA Hazardous Waste No.: D003 (aerosol only)

Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA):  
None

Toxic Substances Control Act (TSCA):  
All components of this product are TSCA inventory listed and/or are exempt.

Superfund Amendments and Reauthorization Act (SARA) Title III SARA Section 311/312 (40 CFR 370) Hazard Categories:  
Sudden Release of Pressure (aerosols only), Fire Hazard, Immediate (Acute) Health Hazard, Delayed (Chronic) Health Hazard

This product contains the following toxic chemical(s) subject to reporting requirements of SARA Section 313 (40 CFR 372):  
No individual section 313 component is present at or above 1%.

Section 112 Hazardous Air Pollutants (HAPs): None

State Regulations

California: This product does not contain chemical(s) known to the State of California to cause cancer, birth defects or other

California and OTC States: This product conforms to consumer product regulations.

New Jersey Right to Know:


Aerosol: Distillates (Petroleum), Hydrotreated Light 64742-47-8 • Distillates (Petroleum), Hydrotreated Middle 64742-46-7 • Carbon Dioxide 124-38-9 • Sorbitan Trioleate 26266-58-0 • Proprietary Mixture NJ TS RN 800967-5473P  
Bulk: Distillates (Petroleum), Hydrotreated Light 64742-47-8 • Distillates (Petroleum), Hydrotreated Middle 64742-46-7 • Sorbitan Trioleate 26266-58-0 • Proprietary Mixture NJ TS RN 800967-5473P • C18 Unsaturated Dimer Fatty Acids 61788-89-4

International Regulations


Canadian Environmental Protection Act (CEPA):  
All of the components of this product are included on the Canadian Domestic Substances list (DSL).

Canadian Workplace Hazardous Materials Information System WHMIS:  
This product has been classified in accordance with the hazard criteria of the Controlled Products Regulations and the MSDS contains all the information required by the Controlled Products Regulations.

**WHMIS Classification:**  
Aerosol: Class A, Class B5, Class D2B



**WHMIS Classification:**  
Bulk: Class B3, Class D2B



Other Regulations:

Montreal Protocol listed ingredients:	None
Stockholm Convention listed ingredients:	None
Rotterdam Convention listed ingredients:	None
RoHS Compliant:	Yes




MATERIAL SAFETY DATA SHEET  
LPS® LST

Revision Date: February 17, 2012

Supersedes: February 17, 2009

Section 16 • Other Information

MSDS#: 11916 MSDS Preparation Responsible Name: Elena Badiuzzi Compliance Manager Telephone: +1 770 243-8800	<b>HMIS 1996</b>		<b>HMIS III</b>		NFPA Flammability  Health      Reactivity Special
	Health:	1	Health:	[/] 1	
	Flammability:	2	Flammability Aerosol:	4	
			Flammability Bulk:	2	
	Reactivity:	0	Physical Hazard Aerosol:	2	
			Physical Hazard Bulk:	0	

**Notice to Reader:**

To the best of our knowledge, the information contained herein is accurate. However, neither the above named supplier nor any of its subsidiaries assumes any liability whatsoever for the accuracy or completeness of the information contained herein. Final determination of suitability of any material is the sole responsibility of the user. All materials may present unknown hazards and should be used with caution. Although certain hazards are described herein, we cannot guarantee that these are the only hazards that exist.

Elena Badiuzzi, Compliance Manager  
LPS Laboratories, a division of Illinois Tool Works



# SAFETY DATA SHEET

## 1. Identification

**Product identifier** LPS® ChainMate  
**Other means of identification**  
**Part Number** 02416  
**Recommended use** A spray lubricant designed to penetrate chains and wire ropes, displace moisture and provide long lasting lubrication under high loads and humid conditions.  
**Recommended restrictions** None known.

### Manufacturer/Importer/Supplier/Distributor information

#### Manufacturer

#### Manufacturer

**Company name** LPS Laboratories, a division of Illinois Tool Works, Inc.  
**Address** 4647 Hugh Howell Rd.  
Tucker, GA 30084  
(U.S.A.)  
**Country** Tel: +1 770-243-8800  
**In Case of Emergency** 1-800-424-9300 (inside U.S.)  
+001 703-527-3887 (outside U.S.)  
**Website** www.lpslabs.com  
**E-mail** sds@lpslabs.com

## 2. Hazard(s) identification

**Physical hazards** Flammable aerosols Category 1  
**Health hazards** Skin corrosion/irritation Category 2  
Serious eye damage/eye irritation Category 2  
Specific target organ toxicity, single exposure Category 3 narcotic effects  
**Environmental hazards** Not classified.  
**OSHA defined hazards** Not classified.  
**Label elements**



**Signal word** Danger  
**Hazard statement** Extremely flammable aerosol. Causes skin irritation. May cause drowsiness or dizziness. Causes serious eye irritation.  
**Precautionary statement**  
**Prevention** Keep away from heat/sparks/open flames/hot surfaces. - No smoking. Do not spray on an open flame or other ignition source. Pressurized container: Do not pierce or burn, even after use. Do not breathe gas. Wash thoroughly after handling. Use only outdoors or in a well-ventilated area. Wear protective gloves. Wear eye/face protection.  
**Response** If on skin: Wash with plenty of water. Specific treatment (see this label). If skin irritation occurs: Get medical advice/attention. Take off contaminated clothing and wash before reuse. If inhaled: Remove person to fresh air and keep comfortable for breathing. Call a poison center/doctor if you feel unwell. IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. If eye irritation persists: Get medical advice/attention.  
**Storage** Protect from sunlight. Do not expose to temperatures exceeding 50°C/122°F. Store in a well-ventilated place. Keep container tightly closed. Store locked up.  
**Disposal** Dispose of contents/container in accordance with local/regional/national/international regulations.  
**Hazard(s) not otherwise classified (HNOC)** None known.  
**Supplemental information** 65.99% of the mixture consists of component(s) of unknown long-term hazards to the aquatic environment.

## 3. Composition/information on ingredients

### Mixtures

Chemical name	Common name and synonyms	§ number	%
Heptane		142-82-5	10 - < 20
Petroleum Gases, Liquified, Sweetened		68476-86-8	10 - < 20
Acetone		67-64-1	3 - < 5
Other components below reportable levels			70 - < 80

\*Designates that a specific chemical identity and/or percentage of composition has been withheld as a trade secret.

#### 4. First-aid measures

<b>Inhalation</b>	Remove victim to fresh air and keep at rest in a position comfortable for breathing. Oxygen or artificial respiration if needed. Do not use mouth-to-mouth method if victim inhaled the substance. Induce artificial respiration with the aid of a pocket mask equipped with a one-way valve or other proper respiratory medical device. Call a POISON CENTER or doctor/physician if you feel unwell.
<b>Skin contact</b>	In case of contact, immediately flush skin with plenty of water for at least 15 minutes while removing contaminated clothing and shoes. Get medical attention if irritation develops and persists.
<b>Eye contact</b>	Immediately flush with plenty of water for at least 15 minutes. If easy to do, remove contact lenses. Get medical attention if irritation develops and persists.
<b>Ingestion</b>	Call a physician or poison control center immediately. Only induce vomiting at the instruction of medical personnel. Never give anything by mouth to an unconscious person. If vomiting occurs, keep head low so that stomach content doesn't get into the lungs.
<b>Most important symptoms/effects, acute and delayed</b>	Irritant effects. Symptoms may include stinging, tearing, redness, swelling, and blurred vision. Defatting of the skin. Rash. Symptoms of overexposure can include shortness of breath, drowsiness, headaches, confusion, decreased coordination, visual disturbances and vomiting, and are reversible if exposure is stopped.
<b>Indication of immediate medical attention and special treatment needed</b>	Provide general supportive measures and treat symptomatically. In case of shortness of breath, give oxygen. Keep victim under observation. Symptoms may be delayed.
<b>General information</b>	In the case of accident or if you feel unwell, seek medical advice immediately (show the label where possible). Ensure that medical personnel are aware of the material(s) involved, and take precautions to protect themselves.

#### 5. Fire-fighting measures

<b>Suitable extinguishing media</b>	Powder. Water. Foam. Carbon dioxide (CO <sub>2</sub> ).
<b>Unsuitable extinguishing media</b>	Do not use a solid water stream as it may scatter and spread fire.
<b>Specific hazards arising from the chemical</b>	Contents under pressure. Pressurized container may explode when exposed to heat or flame.
<b>Special protective equipment and precautions for firefighters</b>	Firefighters must use standard protective equipment including flame retardant coat, helmet with face shield, gloves, rubber boots, and in enclosed spaces, SCBA.
<b>Fire-fighting equipment/instructions</b>	Move containers from fire area if you can do so without risk. Containers should be cooled with water to prevent vapor pressure build up. For massive fire in cargo area, use unmanned hose holder or monitor nozzles, if possible. If not, withdraw and let fire burn out.
<b>Specific methods</b>	Use standard firefighting procedures and consider the hazards of other involved materials. Move containers from fire area if you can do so without risk. Cool containers exposed to flames with water until well after the fire is out. In the event of fire and/or explosion do not breathe fumes.
<b>General fire hazards</b>	Extremely flammable aerosol.

#### 6. Accidental release measures

<b>Personal precautions, protective equipment and emergency procedures</b>	Keep unnecessary personnel away. Keep people away from and upwind of spill/leak. Keep out of low areas. Wear appropriate personal protective equipment. Do not touch damaged containers or spilled material unless wearing appropriate protective clothing. Avoid breathing gas. Ventilate closed spaces before entering them. Local authorities should be advised if significant spillages cannot be contained. Use personal protection recommended in Section 8 of the SDS.
<b>Methods and materials for containment and cleaning up</b>	Refer to attached safety data sheets and/or instructions for use. Eliminate all ignition sources (no smoking, flares, sparks, or flames in immediate area). Keep combustibles (wood, paper, oil, etc.) away from spilled material. This material is classified as a water pollutant under the Clean Water Act and should be prevented from contaminating soil or from entering sewage and drainage systems which lead to waterways. Stop leak if you can do so without risk. Move the cylinder to a safe and open area if the leak is irreparable. Isolate area until gas has dispersed. Following product recovery, flush area with water. For waste disposal, see section 13 of the SDS.
<b>Environmental precautions</b>	Avoid discharge into drains, water courses or onto the ground.



## 7. Handling and storage

### Precautions for safe handling

Pressurized container: Do not pierce or burn, even after use. Do not use if spray button is missing or defective. Do not spray on a naked flame or any other incandescent material. Do not smoke while using or until sprayed surface is thoroughly dry. Do not cut, weld, solder, drill, grind, or expose containers to heat, flame, sparks, or other sources of ignition. Do not re-use empty containers. Do not breathe gas. Avoid contact with skin. Avoid contact with eyes. Avoid prolonged exposure. Avoid contact with clothing. Use only in well-ventilated areas. Wear appropriate personal protective equipment. Observe good industrial hygiene practices. When using, do not eat, drink or smoke. Wash hands thoroughly after handling.

### Conditions for safe storage, including any incompatibilities

Level 3 Aerosol.

Store locked up. Pressurized container. Protect from sunlight and do not expose to temperatures exceeding 50°C/122 °F. Do not puncture, incinerate or crush. Do not handle or store near an open flame, heat or other sources of ignition. This material can accumulate static charge which may cause spark and become an ignition source. Store away from incompatible materials (see Section 10 of the SDS).

## 8. Exposure controls/personal protection

### Occupational exposure limits

#### US. OSHA Table Z-1 Limits for Air Contaminants (29 CFR 1910.1000)

Components	Type	Value
Acetone (CAS 67-64-1)	PEL	2400 mg/m <sup>3</sup> 1000 ppm
Heptane (CAS 142-82-5)	PEL	2000 mg/m <sup>3</sup> 500 ppm

#### US. ACGIH Threshold Limit Values

Components	Type	Value
Acetone (CAS 67-64-1)	STEL TWA	750 ppm 500 ppm
Heptane (CAS 142-82-5)	STEL TWA	500 ppm 400 ppm

#### US. NIOSH: Pocket Guide to Chemical Hazards

Components	Type	Value
Acetone (CAS 67-64-1)	TWA	590 mg/m <sup>3</sup> 250 ppm
Heptane (CAS 142-82-5)	Ceiling TWA	1800 mg/m <sup>3</sup> 440 ppm 350 mg/m <sup>3</sup> 85 ppm

### Biological limit values

#### ACGIH Biological Exposure Indices

Components	Value	Determinant	Specimen	Sampling Time
Acetone (CAS 67-64-1)	50 mg/l	Acetone	Urine	*

\* - For sampling details, please see the source document.

### Appropriate engineering controls

Good general ventilation (typically 10 air changes per hour) should be used. Ventilation rates should be matched to conditions. If applicable, use process enclosures, local exhaust ventilation, or other engineering controls to maintain airborne levels below recommended exposure limits. If exposure limits have not been established, maintain airborne levels to an acceptable level.

### Individual protection measures, such as personal protective equipment

#### Eye/face protection

Wear safety glasses with side shields (or goggles). Eye wash fountain is recommended.

#### Skin protection

##### Hand protection

Chemical resistant gloves are recommended.

##### Other

Avoid contact with clothing. Wear suitable protective clothing. Chemical resistant gloves.

#### Respiratory protection

No personal respiratory protective equipment normally required. Use a positive-pressure air-supplied respirator if there is any potential for an uncontrolled release, exposure levels are not known, or any other circumstances where air-purifying respirators may not provide adequate protection.

#### Thermal hazards

Not applicable.

### General hygiene considerations

When using, do not eat, drink or smoke. Always observe good personal hygiene measures, such as washing after handling the material and before eating, drinking, and/or smoking. Routinely wash work clothing and protective equipment to remove contaminants.

## 9. Physical and chemical properties

### Appearance

Physical state	Gas.
Form	Aerosol.
Color	Dark grey. Black.
Odor	Slight petroleum odor
Odor threshold	Not established
pH	Not applicable
Melting point/freezing point	Not established
Initial boiling point and boiling range	Not established
Flash point	< -0.4 °F (< -18.0 °C) Tag Closed Cup
Evaporation rate	Not established
Flammability (solid, gas)	Not available.

### Upper/lower flammability or explosive limits

Flammability limit - lower (%)	Not established
Flammability limit - upper (%)	Not established
Explosive limit - lower (%)	Not available.
Explosive limit - upper (%)	Not available.

Vapor pressure	Not established
Vapor density	> 1
Relative density	Not available.

### Solubility(ies)

Solubility (water)	Insoluble
Partition coefficient (n-octanol/water)	Not established
Auto-ignition temperature	Not established
Decomposition temperature	Not established

Viscosity	31 cP
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### Other information

Density	7.09
Heat of combustion	> 30 kJ/g
Percent volatile	32.5 %
Specific gravity	0.85 @ 20°C
VOC (Weight %)	24.5 % per US State and Federal Consumer Product Regulations

## 10. Stability and reactivity

Reactivity	The product is stable and non-reactive under normal conditions of use, storage and transport.
Chemical stability	Material is stable under normal conditions.
Possibility of hazardous reactions	Hazardous polymerization does not occur.
Conditions to avoid	Avoid temperatures exceeding the flash point. Contact with incompatible materials.
Incompatible materials	Strong oxidizing agents. Strong acids.
Hazardous decomposition products	Upon decomposition this product emits acrid dense smoke with carbon dioxide, carbon monoxide, water and other products of combustion.

## 11. Toxicological information

### Information on likely routes of exposure

Ingestion	May cause discomfort if swallowed. However, ingestion is not likely to be a primary route of occupational exposure.
Inhalation	Narcotic effects. Prolonged inhalation may be harmful.
Skin contact	Causes skin irritation. Frequent or prolonged contact may defat and dry the skin, leading to discomfort and dermatitis.
Eye contact	Causes serious eye irritation.

**Symptoms related to the physical, chemical and toxicological characteristics**

n irritation. Causes serious eye irritation. Vapors h. a narcotic effect and may cause headache, fatigue, dizziness and nausea.

**Information on toxicological effects**

**Acute toxicity** Based on available data, the classification criteria are not met.

Components	Species	Test Results
Acetone (CAS 67-64-1)		
<b>Acute</b>		
<i>Dermal</i>		
LD50	Rabbit	20000 mg/kg 20 ml/kg
<i>Inhalation</i>		
LC50	Rat	76 mg/l, 4 Hours 50.1 mg/l, 8 Hours
<i>Oral</i>		
LD50	Mouse	3000 mg/kg
	Rabbit	5340 mg/kg
	Rat	5800 mg/kg
<i>Other</i>		
LD50	Mouse	1297 mg/kg
	Rat	5500 mg/kg
Heptane (CAS 142-82-5)		
<b>Acute</b>		
<i>Dermal</i>		
LD50	Rabbit	> 2000 mg/kg
<i>Inhalation</i>		
LC50	Rat	> 29.29 mg/l 103 mg/l, 4 Hours
LD50	Mouse	75 mg/l, 2 Hours
<i>Oral</i>		
LD50	Rat	> 5000 mg/kg
<i>Other</i>		
LD50	Mouse	222 mg/kg

\* Estimates for product may be based on additional component data not shown.

<b>Skin corrosion/irritation</b>	Causes skin irritation.
<b>Serious eye damage/eye irritation</b>	Causes serious eye irritation.
<b>Respiratory or skin sensitization</b>	
<b>Respiratory sensitization</b>	Based on available data, the classification criteria are not met.
<b>Skin sensitization</b>	Based on available data, the classification criteria are not met.
<b>Germ cell mutagenicity</b>	No data available to indicate product or any components present at greater than 0.1% are mutagenic or genotoxic.
<b>Carcinogenicity</b>	Based on available data, the classification criteria are not met.
<b>ACGIH Carcinogens</b>	
Acetone (CAS 67-64-1)	Not classifiable as a human carcinogen. A4
<b>Reproductive toxicity</b>	Based on available data, the classification criteria are not met.
<b>Specific target organ toxicity - single exposure</b>	Narcotic effects.
<b>Specific target organ toxicity - repeated exposure</b>	Based on available data, the classification criteria are not met.
<b>Aspiration hazard</b>	Based on available data, the classification criteria are not met.
<b>Chronic effects</b>	Prolonged inhalation may be harmful.

**12. Ecological information**

**Ecotoxicity** Very toxic to aquatic life with long lasting effects.

Components	Species		est Results
Acetone (CAS 67-64-1)			
<b>Aquatic</b>			
Crustacea	EC50	Water flea (Daphnia magna)	10294 - 17704 mg/l, 48 hours
Fish	LC50	Rainbow trout, donaldson trout (Oncorhynchus mykiss)	4740 - 6330 mg/l, 96 hours
Heptane (CAS 142-82-5)			
<b>Aquatic</b>			
Fish	LC50	Mozambique tilapia (Tilapia mossambica)	375 mg/l, 96 hours

\* Estimates for product may be based on additional component data not shown.

**Persistence and degradability** Not inherently biodegradable.

**Bioaccumulative potential** Not available.

**Partition coefficient n-octanol / water (log Kow)**

LPS® ChainMate	> 1
Acetone	-0.24
Heptane	4.66

**Mobility in soil** Readily absorbed into soil.

**Other adverse effects** None known.

### 13. Disposal considerations

**Disposal instructions** Collect and reclaim or dispose in sealed containers at licensed waste disposal site. Contents under pressure. Do not puncture, incinerate or crush. This material and its container must be disposed of as hazardous waste. Do not allow this material to drain into sewers/water supplies. Do not contaminate ponds, waterways or ditches with chemical or used container. Dispose of contents/container in accordance with local/regional/national/international regulations.

**Local disposal regulations** Dispose in accordance with all applicable regulations.

**Hazardous waste code** D001: Waste Flammable material with a flash point <140 F  
D003: Waste Reactive material

**US RCRA Hazardous Waste U List: Reference**

Acetone (CAS 67-64-1) U002

**Waste from residues / unused products** Dispose of in accordance with local regulations. Empty containers or liners may retain some product residues. This material and its container must be disposed of in a safe manner (see: Disposal instructions).

**Contaminated packaging** Empty containers should be taken to an approved waste handling site for recycling or disposal. Since emptied containers may retain product residue, follow label warnings even after container is emptied. Do not re-use empty containers.

### 14. Transport information

**DOT**

<b>UN number</b>	UN1950
<b>UN proper shipping name</b>	Aerosols, flammable
<b>Transport hazard class(es)</b>	
<b>Class</b>	2.1
<b>Subsidiary risk</b>	-
<b>Label(s)</b>	2.1
<b>Packing group</b>	Not applicable.
<b>Environmental hazards</b>	
<b>Marine pollutant</b>	No
<b>Special precautions for user</b>	Read safety instructions, SDS and emergency procedures before handling.
<b>Special provisions</b>	N82
<b>Packaging exceptions</b>	306
<b>Packaging bulk</b>	None

**IATA**

<b>UN number</b>	UN1950
<b>UN proper shipping name</b>	Aerosols, flammable
<b>Transport hazard class(es)</b>	
<b>Class</b>	2.1
<b>Subsidiary risk</b>	-
<b>Packing group</b>	Not applicable.
<b>Environmental hazards</b>	No.
<b>ERG Code</b>	10L

**Special precautions for user** Read safety instructions, SDS and emergency procedures before handling.

**Other information**

**Passenger and cargo aircraft** Allowed.

**Cargo aircraft only** Allowed.

**IMDG**

**UN number** UN1950

**UN proper shipping name** AEROSOLS, flammable (Heptane), MARINE POLLUTANT

**Transport hazard class(es)**

**Class** 2.1

**Subsidiary risk** -

**Packing group** Not applicable.

**Environmental hazards**

**Marine pollutant** Yes

**Ems** F-D, S-U

**Special precautions for user** Read safety instructions, SDS and emergency procedures before handling.

**Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code** Not applicable.

**DOT**



**IATA; IMDG**



**Marine pollutant**



**15. Regulatory information**

**US federal regulations** This product is a "Hazardous Chemical" as defined by the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

**TSCA Section 12(b) Export Notification (40 CFR 707, Subpt. D)**

Not regulated.

**CERCLA Hazardous Substance List (40 CFR 302.4)**

Acetone (CAS 67-64-1)

LISTED

**US. OSHA Specifically Regulated Substances (29 CFR 1910.1001-1050)**

Not listed.

**SARA 304 Emergency release notification**

Not regulated.

**Superfund Amendments and Reauthorization Act of 1986 (SARA)**

**Hazard categories**  
 Immediate Hazard - Yes  
 Delayed Hazard - No  
 Fire Hazard - Yes  
 Pressure Hazard - Yes  
 Reactivity Hazard - No

**SARA 302 Extremely hazardous substance** Yes

**SARA 311/312 Hazardous chemical** Yes

**SARA 313 (TRI reporting)**  
 Not regulated.

**Other federal regulations**

**Clean Air Act (CAA) Section 112 Hazardous Air Pollutants (HAPs) List**  
 Not regulated.

**Clean Air Act (CAA) Section 112(r) Accidental Release Prevention (40 CFR 68.130)**  
 Not regulated.

**Safe Drinking Water Act (SDWA)** Not regulated.

**Drug Enforcement Administration (DEA). List 2, Essential Chemicals (21 CFR 1310.02(b) and 1310.04(f)(2) and Chemical Code Number**

Acetone (CAS 67-64-1) 6532

**Drug Enforcement Administration (DEA). List 1 & 2 Exempt Chemical Mixtures (21 CFR 1310.12(c))**

Acetone (CAS 67-64-1) 35 % weight/volumn

**DEA Exempt Chemical Mixtures Code Number**

Acetone (CAS 67-64-1) 6532

**US state regulations****US. Massachusetts RTK - Substance List**

Acetone (CAS 67-64-1)

Heptane (CAS 142-82-5)

**US. New Jersey Worker and Community Right-to-Know Act**

Not regulated.

**US. Pennsylvania RTK - Hazardous Substances**

Acetone (CAS 67-64-1)

Heptane (CAS 142-82-5)

**US. Rhode Island RTK**

Acetone (CAS 67-64-1)

**US. California Proposition 65**

California Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): This material is not known to contain any chemicals currently listed as carcinogens or reproductive toxins.

**International Inventories**

Country(s) or region	Inventory name	On inventory (yes/no)*
Australia	Australian Inventory of Chemical Substances (AICS)	No
Canada	Domestic Substances List (DSL)	Yes
Canada	Non-Domestic Substances List (NDSL)	No
China	Inventory of Existing Chemical Substances in China (IECSC)	No
Europe	European Inventory of Existing Commercial Chemical Substances (EINECS)	No
Europe	European List of Notified Chemical Substances (ELINCS)	No
Japan	Inventory of Existing and New Chemical Substances (ENCS)	No
Korea	Existing Chemicals List (ECL)	No
New Zealand	New Zealand Inventory	No
Philippines	Philippine Inventory of Chemicals and Chemical Substances (PICCS)	No
United States & Puerto Rico	Toxic Substances Control Act (TSCA) Inventory	Yes

\*A "Yes" indicates that all components of this product comply with the inventory requirements administered by the governing country(s)

A "No" indicates that one or more components of the product are not listed or exempt from listing on the inventory administered by the governing country(s).

**16. Other information, including date of preparation or last revision**

**Issue date** 09-19-2013

Material name: LPS® ChainMate

739 Version #: 02 Revision date: 11-05-2013 Issue date: 09-19-2013

SDS US

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**Revision date** J5-2013  
**Version #** 02  
**HMIS® ratings** Health: 1  
Flammability: 4  
Physical hazard: 0  
**NFPA ratings** Health: 1  
Flammability: 4  
Instability: 0

**Disclaimer** The information provided in this Safety Data Sheet is correct to the best of our knowledge, information and belief at the date of its publication. The information given is designed only as a guidance for safe handling, use, processing, storage, transportation, disposal and release and is not to be considered a warranty or quality specification. The information relates only to the specific material designated and may not be valid for such material used in combination with any other materials or in any process, unless specified in the text.

**Revision Information** Composition / Information on Ingredients: Ingredients  
Physical & Chemical Properties: Multiple Properties  
Transport Information: Material Transportation Information  
Regulatory Information: United States  
HazReg Data: International Inventories  
GHS: Classification

Attachment to 7.c. P000157PC2

DATE	GAS TURBINE			COEN DUCT BURNER			MAXON BURNER			CEMS					
	Monthly (therms)	HHV	Monthly (scf)	Monthly (therms)	Monthly (scf)	Rolling 12-month (MMBtu)	Monthly (therms)	Monthly (scf)	Rolling 12-month (MMBtu)	NOx (tons)	Rolling 12-month (tons)	Monthly CO (tons)	Monthly NOx (tons)	Rolling 12-month CO (tons)	Rolling 12-month NOx (tons)
May-12	2,000,575	1,015	197,100,985	59,041	5,816,847	63	2,542	247,980	8.0	0.011	0.37	9.00	3.91	53.2	39.7
Jun-12	1,973,691	1,025	192,555,220	29,147	2,843,610	63	18,368	1,791,854	9.6	0.083	0.44	5.46	3.82	54.5	39.8
Jul-12	2,089,220	1,031	202,640,155	22,319	2,164,791	61	8,639	842,761	10.2	0.039	0.47	3.99	4.02	54.7	40.6
Aug-12	2,048,680	1,021	200,654,261	26,782	2,623,115	59	6,566	640,533	10.4	0.030	0.48	4.29	4.00	54.8	40.8
Sep-12	1,983,602	1,013	195,814,610	24,738	2,442,053	58	4,804	468,645	10.6	0.022	0.49	4.40	3.97	55.9	41.8
Oct-12	1,993,708	1,035	192,628,792	26,366	2,547,440	56	5,588	545,126	10.8	0.025	0.50	4.24	3.92	56.8	42.6
Nov-12	1,757,585	1,027	171,137,780	23,749	2,312,463	53	5,553	541,712	10.6	0.025	0.49	3.69	3.75	57.1	43.5
Dec-12	1,893,663	1,034	183,139,555	76,973	7,444,197	57	8,056	785,887	10.2	0.036	0.47	5.91	3.90	61.4	45.5
Jan-13	1,934,972	1,032	187,497,287	53,526	5,186,628	54	419	40,875	8.9	0.002	0.41	5.26	3.86	62.4	45.9
Feb-13	1,371,871	1,031	133,062,173	22,905	2,221,629	47	110	10,731	8.5	0.000	0.39	3.69	2.75	61.3	44.9
Mar-13	2,005,639	1,037	193,407,811	35,600	3,432,980	44	695	67,799	7.4	0.003	0.34	5.13	4.02	62.1	45.6
Apr-13	1,924,347	1,027	187,375,560	30,540	2,973,710	42	5,172	504,544	6.5	0.023	0.30	4.43	3.82	59.5	45.7
May-13	1,732,673	1,016	170,538,681	14,939	1,470,374	38	10,615	1,035,526	7.3	0.048	0.34	4.09	3.68	54.6	45.5
Jun-13	1,956,882	1,026	190,729,240	13,728	1,338,012	36	8,193	799,252	6.3	0.037	0.29	5.15	3.81	54.3	45.5
Jul-13	2,021,193	1,027	196,805,550	11,297	1,100,000	35	12,291	1,199,024	6.6	0.055	0.31	6.09	3.90	56.4	45.4
Aug-13	2,018,859	1,032	195,625,872	10,128	981,395	33	6,985	681,408	6.7	0.031	0.31	5.30	3.90	57.4	45.3
Sep-13	2,031,610	1,032	196,861,434	15,319	1,484,399	32	9,607	937,192	7.1	0.043	0.33	6.54	3.93	59.5	45.2
Oct-13	1,794,950	1,017	176,494,592	38,090	3,745,329	34	8,674	846,175	7.5	0.039	0.34	5.32	3.86	60.6	45.2
Nov-13	1,905,757	1,030	185,024,951	36,206	3,515,146	35	7,841	764,913	7.7	0.035	0.35	5.99	3.79	62.9	45.2
Dec-13	1,861,322	1,032	180,360,659	20,147	1,952,229	29	1,570	153,158	7.0	0.007	0.32	5.14	3.64	62.1	45.0
Jan-14	1,664,333	1,029	161,742,760	31,218	3,033,819	27	7,707	751,841	7.8	0.035	0.36	4.44	3.25	61.3	44.4
Feb-14	1,800,752	1,016	177,239,370	20,032	1,971,654	27	18,194	1,774,880	9.5	0.082	0.44	4.43	3.45	62.1	45.1
Mar-14	1,709,695	1,017	168,111,603	29,462	2,896,952	26	20,997	2,048,321	11.5	0.094	0.53	5.28	3.42	62.2	44.5
Max. Rolling 12 Months						42			11.5		0.53			62.90	45.74
Permit Limit						854			36.5		1.90			97.66	50.0
Exceeds Permit Limit?						NO			NO		NO			NO	NO
Excess Emissions (Max. Rolling 12 Months)						-610			-25.0		-1.37			-34.76	-4.26
Excess Emissions (Compliance Year)						-897			-29.4		-1.57			-52.02	-10.39

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

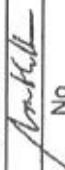
lb/hr = X \* (hourly ppmv@15% O2) \* (hourly fuel throughput)

ton/yr = Sum of hourly emissions for each month and evaluate annual limits based on rolling 12-month average. 2000 lb/ton.

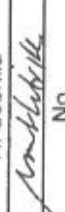
where  $X = (8,740 \text{ dscf/MMBtu}) * [(NOx \text{ or } CO) \text{ lb/lb-mole}] * (20.9/(20.9-15)) * (\text{lb-mole}/387 \text{ scf}) * 1E-6 * HHV$   
 HHV = 1,025 btu/cf  
 NOx = 46 lb/lb-mole  
 CO = 28 lb/lb-mole  
 (average HHV of fuel analyses over compliance year)



### Stack Opacity Observation Protocol

Object:	Cogen Stack
Date of Observation:	2/10/2014
Time of Observation:	2:00 PM
Fuel burned:	Natural Gas
Name of the observing person:	R. Lebrilla
Signature	
Was Visible Emission Other Than Steam Present ?	No
Object:	Nebraska Boiler
Date of Observation:	n/a
Time of Observation:	n/a
Fuel burned:	n/a
Name of the observing person:	n/a
Signature	n/a
Was Visible Emission Other Than Steam Present ?	n/a

Object:	Paper Forming/Paper Drying
Date of Observation:	2/10/2014
Time of Observation:	2:00 PM
Fuel burned:	N/A
Name of the observing person:	R. Lebrilla
Signature	
Was Visible Emission Other Than Steam Present ?	No

Object:	Maxon Burner
Date of Observation:	2/10/2014
Time of Observation:	2:00 PM
Fuel burned:	Natural Gas
Name of the observing person:	R. Lebrilla
Signature	
Was Visible Emission Other Than Steam Present ?	No

### Stack Opacity Observation Protocol

Object:	Cogen Stack
Date of Observation:	11/21/13
Time of Observation:	9:45 AM
Fuel burned:	Natural Gas
Name of the observing person:	R. Lebrilla
Signature	<i>R. Lebrilla</i>
Was Visible Emission Other Than Steam Present ?	NO
Object:	Nebraska Boiler
Date of Observation:	11/22/13
Time of Observation:	4:30 PM
Fuel burned:	Natural Gas
Name of the observing person:	R. Lebrilla
Signature	<i>R. Lebrilla</i>
Was Visible Emission Other Than Steam Present ?	NO

Object:	Paper Forming/Paper Drying
Date of Observation:	11/21/13
Time of Observation:	9:45 AM
Fuel burned:	Natural Gas
Name of the observing person:	R. Lebrilla
Signature	<i>R. Lebrilla</i>
Was Visible Emission Other Than Steam Present ?	NO

Object:	Maxon Burner
Date of Observation:	11/21/13
Time of Observation:	9:45 AM
Fuel burned:	Natural Gas
Name of the observing person:	R. Lebrilla
Signature	<i>R. Lebrilla</i>
Was Visible Emission Other Than Steam Present ?	NO

## Stack Opacity Observation Protocol

Object:	Cogen Stack
Date of Observation:	08/15/13
Time of Observation:	9:00 AM
Fuel burned:	Natural Gas
Name of the observing person:	R. Lebrilla
Signature	<i>R. Lebrilla</i>
Was Visible Emission Other Than Steam Present ?	No
Object:	Nebraska Boiler
Date of Observation:	08/15/13
Time of Observation:	9:00 AM
Fuel burned:	N/A
Name of the observing person:	R. Lebrilla
Signature	<i>R. Lebrilla</i>
Was Visible Emission Other Than Steam Present ?	N/A

Object:	Paper Forming/Paper Drying
Date of Observation:	08/15/13
Time of Observation:	9:00 AM
Fuel burned:	Natural Gas
Name of the observing person:	R. Lebrilla
Signature	<i>R. Lebrilla</i>
Was Visible Emission Other Than Steam Present ?	NO

Object:	Maxon Burner
Date of Observation:	08/15/13
Time of Observation:	9:00 AM
Fuel burned:	Natural Gas
Name of the observing person:	R. Lebrilla
Signature	<i>R. Lebrilla</i>
Was Visible Emission Other Than Steam Present ?	NO

## Stack Opacity Observation Protocol

<b>Object:</b>	Cogen Stack
Date of Observation:	05/21/13
Time of Observation:	1 :00 PM
Fuel burned:	Natural Gas
Name of the observing person:	R. Lebrilla
Signature	<i>R. Lebrilla</i>
Was Visible Emission Other Than Steam Present ?	NO
<b>Object:</b>	Nebraska Boiler
Date of Observation:	05/16/13
Time of Observation:	1:00 PM
Fuel burned:	N/A
Name of the observing person:	R. Lebrilla
Signature	<i>R. Lebrilla</i>
Was Visible Emission Other Than Steam Present ?	NO

<b>Object:</b>	Paper Forming/Paper Drying
Date of Observation:	05/21/13
Time of Observation:	1 :00 PM
Fuel burned:	Natural Gas
Name of the observing person:	R. Lebrilla
Signature	<i>R. Lebrilla</i>
Was Visible Emission Other Than Steam Present ?	NO

<b>Object:</b>	Maxon Burner
Date of Observation:	05/21/13
Time of Observation:	1 :00 PM
Fuel burned:	Natural Gas
Name of the observing person:	R. Lebrilla
Signature	<i>R. Lebrilla</i>
Was Visible Emission Other Than Steam Present ?	NO

**VENTURA COUNTY  
AIR POLLUTION CONTROL DISTRICT**  
Memorandum

TO: Karl Krause

DATE: May 23, 1996

FROM: Terri Thomas

SUBJECT: Rule 54.B.2 Compliance

Per your request, I ran some screening level dispersion modeling tests to determine equipment parameters that would comply with Rule 54.B.2. Rule 54.B.2 limits ground level property line SO<sub>2</sub> concentrations to 0.25 ppm<sub>v</sub> for 1 hour and 0.04 ppm<sub>v</sub> for 24 hours.

I assume that the most common SO<sub>2</sub> emission source is diesel combustion in IC engines. Therefore, that was the focus of my analysis.

To determine appropriate stack parameters, I reviewed 4 source test reports for diesel ICEs prepared for AB 2588. For screening purposes, the most conservative value was chosen from the test data for each stack parameter. The following summarizes stack data from these reports:

Parameter	# tests reporting parameter value	range of values	screening value
Stack velocity	3	1,812-11,343 ft/min	1,812 ft/min 9.2 m/s
Stack diameter	3	2-6 inches	2 inches 0.05 meters
Stack temperature	4	192-785°F	192°F 362 K
Stack height	0	NA	2 meters

SO<sub>2</sub> emissions were based on 300 ppm<sub>v</sub> in the stack, which is the limit in Rule 54.B.1.a. This limit cannot be exceed if the diesel fuel meets the 0.5% sulfur limit in Rule 64.B.2.

Other assumptions used in modeling were that the stack was vertical and has no raincap, and the property line was at least 100 meters from the stack.

Using the parameters and assumptions listed above, screening modeling showed that the limits in Rule 54.B.2 would not be exceeded.

Use of the minimum stack diameter, and thus, the minimum flow rate and emission rate is not the most conservative case. In order to determine the maximum emission rate that could be shown to meet the Rule under the conditions described above, modeling was performed by increasing the emissions and flow rate (to maintain the 300 ppm<sub>v</sub> SO<sub>2</sub> stack concentration), but increasing the stack diameter to maintain the minimum velocity. Modeling results are summarized below.

Emission rate (g/s)	Emission rate (lb/hr) and (lb/day)	1 hour max concentration (ppm <sub>v</sub> ) (limit=0.25)	24 hour max concentration (ppm <sub>v</sub> ) (limit=0.04)
0.0145	0.12 2.76	0.04	0.01
0.029	0.23 5.52	0.06	0.03
0.058	0.46 11.04	0.11	0.04
0.116	0.92 22.08	0.17	0.07
0.232	1.84 44.15	0.23	0.05

From the above, if SO<sub>2</sub> emissions do not exceed 1.84 lb/hr, the 1-hour limit of Rule 54.B.2 will be met. This is equivalent to burning 26 gallons of diesel at 0.5% sulfur per hour.

If SO<sub>2</sub> emissions do not exceed 11.04 lb/day, the 24-hour limit of Rule 54.B.2 will be met. This is equivalent to burning 155 gallons of diesel at 0.5% sulfur per day.

If the sulfur content of the fuel is lower than 0.5%, the allowable amount of fuel would, of course, be greater.

Let me know if the above information meets your needs. If so, another scenario that is probably common is a nonvertical stack (or stack with raincap). I can develop similar information for this case if you want.



operate below this emission factor or emission limit. The particulate matter emission factors for these units are:

Natural Gas Fired Units		Rule 57.B Factor = 0.12 lb PM / MMBTU
Boiler > 100 MMBTU/Hr	3 lb/mmcf	0.00286 lb / MMBTU
Boiler 10 - 100 MMBTU/Hr	13.7 lb/mmcf	0.0131 lb / MMBTU
Boiler < 10 MMBTU/Hr	12 lb/mmcf	0.0114 lb / MMBTU
Turbine		0.0419 lb / MMBTU
Lean Burn Engine		0.046 lb / MMBTU
Rich Burn Engine		0.0007 lb / MMBTU

Fuel Oil or Diesel Fired Units		Rule 57.B Factor = 0.17 lb PM / MMBTU
Fuel Oil Fired Boiler	2 lb / Mgal	0.014 lb / MMBTU
Fuel Oil Fired Turbine		0.061 lb / MMBTU
Diesel Engine > 600 HP		0.062 lb / MMBTU

Compliance with the emission limit for diesel engines < 600 HP has been shown through the conducting of a source test on an engine within Ventura County. This source test was conducted for the purpose of generating an emission factor to be used for Air Toxic "Hot Spots" emission estimations. The measured particulate concentration for this engine was 0.1 gr/dscf at 12 percent CO<sub>2</sub>. The engine source test was a Cummins NTA engine rated at 335 horsepower at 2100 rpm. The source test was conducted July 29, 1992.

m:\title\rule57.Bcomp