



The Procter & Gamble Paper Products Co.
800 No. Rice Ave.
Oxnard, CA 93030
(805) 485-8871 phone
www.pg.com

February 12, 2016

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

Subject: Additional Documents in Support of Part 70 Compliance Certification for Report Year 2015

Mr. Searcy:

Enclosed are additional documents in support of The Procter & Gamble Paper Products Company's Oxnard facility, Part 70 Permit No. 00015 Compliance Certification for the January 1, 2015 through December 31, 2015 reporting period. If you have any questions concerning these documents or would like supplemental information not included with this submission, please contact me at your earliest convenience.

I can be reached at 805-485-8871, x2408 or field.ka@pg.com should you have any questions about this certification.

Respectfully,

Mr. Kyle Field
Site Environmental Leader

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

Ventura County
FEB 12 2016
Air Pollution Control District

Monthly Throughput

PO00015, Section 7, Attachment PO00015PC1 (see Section 3)

The Procter & Gamble Paper Products Company -- Oxnard Plant

Month	Combustion					Papermaking					Converting					Facility Wide Total Emissions								
	ROC (tons)	NOx (tons)	PM (tons)	SOx (tons)	CO (tons)	NH3 (tons)	ROC (tons)	NOx (tons)	PM (tons)	SOx (tons)	CO (tons)	NH3 (tons)	ROC (tons)	NOx (tons)	PM (tons)	SOx (tons)	CO (tons)	NH3 (tons)	ROC (tons)	NOx (tons)	PM (tons)	SOx (tons)	CO (tons)	NH3 (tons)
Jan-15	1.23	8.11	1.42	0.14	9.45	0.41	2.02	--	--	--	--	--	0.19	--	--	--	--	--	3.43	8.11	1.42	0.14	9.45	0.41
Feb-15	1.13	8.56	1.35	0.12	9.02	0.42	2.68	--	--	--	--	--	0.24	--	--	--	--	--	4.05	8.56	1.35	0.12	9.02	0.42
Mar-15	1.25	8.52	1.43	0.15	7.73	0.42	3.28	--	--	--	--	--	0.26	--	--	--	--	--	4.79	8.52	1.43	0.15	7.73	0.42
Apr-15	1.07	7.06	1.22	0.13	13.12	0.55	2.13	--	--	--	--	--	0.20	--	--	--	--	--	3.41	7.06	1.22	0.13	13.12	0.55
May-15	1.11	9.45	1.25	0.14	12.48	0.62	3.46	--	--	--	--	--	0.25	--	--	--	--	--	4.83	9.45	1.25	0.14	12.48	0.62
Jun-15	1.24	8.54	1.43	0.14	14.89	0.56	2.79	--	--	--	--	--	0.19	--	--	--	--	--	4.22	8.54	1.43	0.14	14.89	0.56
Jul-15	1.27	8.14	1.47	0.15	11.49	0.60	3.20	--	--	--	--	--	0.31	--	--	--	--	--	4.79	8.14	1.47	0.15	11.49	0.60
Aug-15	1.25	7.79	1.44	0.15	10.89	0.60	2.75	--	--	--	--	--	0.26	--	--	--	--	--	4.26	7.79	1.44	0.15	10.89	0.60
Sep-15	1.24	7.59	1.43	0.14	10.09	0.61	2.54	--	--	--	--	--	0.24	--	--	--	--	--	4.01	7.59	1.43	0.14	10.09	0.61
Oct-15	1.19	7.77	1.35	0.15	11.14	0.64	2.56	--	--	--	--	--	0.24	--	--	--	--	--	4.00	7.77	1.35	0.15	11.14	0.64
Nov-15	0.90	7.31	1.00	0.12	9.84	0.49	2.79	--	--	--	--	--	0.25	--	--	--	--	--	3.94	7.31	1.00	0.12	9.84	0.49
Dec-15	1.12	7.95	1.26	0.14	11.07	0.66	2.67	--	--	--	--	--	0.20	--	--	--	--	--	3.99	7.95	1.26	0.14	11.07	0.66
12 Mo Total	14.0	96.8	16.1	1.7	131.2	6.6	32.9						2.8						49.7	96.8	16.1	1.7	131.2	6.6
Tons																			ROC	NOx	PM	SOx	CO	NH3
																			16.82	132.88	68.3	2.03	284.93	54.19

Handwritten notes:
 12 Mo Total: 132.88
 284.93
 1719-2125
 1719-2019

Capacity Factor: Babcock & Wilcox Boiler
 PO00015, Section 6, Attachment 103N, Condition 3

Fuel Usage	B301 (MMSCF)
Jan-15	1.68
Feb-15	9.45
Mar-15	1.18
Apr-15	0.38
May-15	3.10
Jun-15	0.69
Jul-15	0.07
Aug-15	0.07
Sep-15	0.07
Oct-15	0.09
Nov-15	7.95
Dec-15	1.47
12 Month Total	26.20

Annual Heat Input (AHI): _____

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

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

AHI = 26.2032984117587 * 1050

AHI = 27,513 MMBTU

Maximum Potential Heat Input (MPHI) _____

Capacity Factor (CF) _____

Rated Firing Capacity (RFC): 100 MMBTU/hr

Maximum Potential Operating Hours (MPOH): 8760 hrs

MPHI = RFC * MPOH
 MPHI = 876,000 MMBTU
 30% of MPHI (Maximum Allowable): 262,800 MMBTU
 Maximum Allowable Rolling 12 month Fuel Usage: 250.29 MMSCF

Capacity Factor = $\frac{\text{Ratio of Annual Actual Heat Input to Maximum Potential Heat Input}}{\text{CF = AHI / MPHI}}$

CF = 0.0314081 Ratio
 % CF = 3.1% (%CF)

Opacity Annual Formal Survey
 Procter & Gamble Oxnard Plant

VCARB Part 70-Form A, Attachment 56 Compliance Document

Conducted On Date:

6/5/15

Time:

15:00

Conducted By:

Kathleen Green

Signature:

Kathleen Green

Visible Emissions Certification #

Most Recent Certification Date

Form 3-Form 08 (06/05)
 Drawing - P653413320

Stack	Stack Height (ft)	Stack Dia (sq ft)	Emissions Unit	Emission Description	Stack Position	Visible Emissions other than Uncombined Water N - if there are no visible emissions for 20 minutes Y - if there are visible emissions > 20% of No. 1 Rings/Minute for 3 minutes
S-1	62	2.50	Washer - Wet Lapper	PM	When Fan motor on	No
S-2	84	12.67	Cogen 2/LM2500 Turbine	Thermal Output with NOx, CO, SOx, PM, ROC, NH3	Sampler closed when 2X is running	No
S-3	27	1.40	B-201 Steam Boiler	Thermal Output with NOx, CO, SOx, PM, ROC	RR closed during 30 (2hr) only - 2094 Exhaust stream in partial exhaust	No
Stack S-4 is not a physical stack but represents the totals stacks from 1X process stacks 4A-4E						
S-4A	26	4.72	1X Pre-Dryer	Thermal Output with NOx, CO, SOx, PM, ROC HAF - Burners GR Cogen - Burners	Open when 1X running	No
S-4B	-	-	Furnace Cooling	HCl Ax Release from shell cooling	Open	No
S-4C	-	-	HPS	Thermal Output, NOx, CO, SOx, PM, ROC	Normally Closed	No
S-4D	57	9.63	Cogen 1/LM2500 Turbine	Thermal Output, NOx, CO, SOx, PM, ROC	Sampler closed when 1X running	No
S-4E	-	-	W/W Break Pulper vent	PM	Open vent	No
S-5	-	-	1X Scrubber	PM	When Fan motor on	No
S-6	-	-	2X Scrubber	PM	When Fan motor on	No
Stack S-7 is not physical stack but represents the totals stacks from 2X - NOTE - PreDryer Exhaust is the emission from the YHAF (after drying)						
S-7A	74	12.22	2X Pre-Dryer Exhaust (YHAF Stack)	Thermal Output with NOx, CO, SOx, PM, ROC, NH3 LM2500 + HAF + FC	Normally Open	No
S-7B	-	-	Exhaust Diversion (H Stack)	Thermal Output with NOx, CO, SOx, PM, ROC, NH3	Normally Closed	No
S-7C	-	-	Vacuum Stack	PM	Open Vent	No
S-7D	-	-	Wet End (Former)	PM	Open Vent	No
S-7E	-	-	1X Break Pulper vent	PM	Open Vent	No
1			Fire Pump #1	CARB Fuel Combustion	Open vent	No
2			Fire Pump #2	CARB Fuel Combustion	Open vent	No
3			Fire Pump #3	CARB Fuel Combustion	Open vent	No
4			Fire Pump #4	CARB Fuel Combustion	Open vent	No
5			Fire Pump #5	CARB Fuel Combustion	Open vent	No

Any Other Visible Emissions?

No

Atmospheric Conditions:

Sunny Wind 7-10 mph



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February 12, 2016

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

Subject: 2015 Annual Title V Compliance Certification and Semi Annual Deviation Report

Mr. Searcy:

Enclosed is The Procter & Gamble Paper Products Company's Oxnard facility, Part 70 Permit No. 00015 Compliance Certification for the January 1, 2015 through December 31, 2015 reporting period. This submission also constitutes the Semi Annual Deviation Report for the time period July 1, 2015 – Dec 31, 2015.

I can be reached at 805-485-8871, x2408 or field.ka@pg.com should you have any questions about our facilities certification.

Respectfully,

Mr. Kyle Field
Site Environmental Leader

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

Ventura County
FEB 12 2016
Air Pollution Control District



The P&G Paper Products Co.
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February 12, 2016

Daniel Cho
Air Quality Engineer
Ventura County APCD
669 County Square Drive
Ventura, California 93003

Ventura County

FEB 12 2016

Air Pollution Control District

Subject: Semi Annual Report - Permit to Operate No. 0015
Excursion Report for 1X, and 2X Paper Machine Dry End Scrubbers
Report Period: 7/1/15 – 12/31/15

Mr. Cho:

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

Additionally, per Section 10, District General Part 70 Permit Conditions, Condition 5, a Responsible Official Certification is attached to these reports.

If you have any questions, please contact me, at (805) 485-8871 x2408 or field.ka@pg.com.

Respectfully,

Kyle Field
Site Environmental Leader

cc: Mr. Gerardo Rios, Permits, Chief, US EPA Region IX
Mr. Mario Aguilar – P&G
Ms. Kara Roeder– P&G



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 contents and information in this document is true, accurate, and complete.

Signature and Title of Responsible Official:		Date:
Sig: <u>Kara Roeder</u>		<u>2/12/16</u>
Title: <u>AG Oxnard Plant Manager</u>		



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February 12, 2016

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

Ventura County
FEB 12 2016
Air Pollution Control District

Subject: Semi Annual Report - Permit to Operate No. 0015
Actual Annual Operating Hours for LM2500 and LM6000 Turbines
Report Period: 1/1/15– 12/31/15

Mr. Searcy:

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

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

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

If you have any questions, please contact me at (805) 485-8871 x2408 or field.ka@pg.com.

Respectfully,

Kyle Field
Site Environmental Leader

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



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>Kara Roeder</u></p> <p>Title: <u>P+G Oxnard Plant Manager</u></p>	<p>Date: <u>2/12/16</u></p>
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REPORT #1 – LM-2500
Operating Hours and Source Test Results

SUMMARY REPORT
ANNUAL OPERATING HOURS AND SOURCE TEST RESULTS

Reporting Period Dates: From 1/1/15 through 12/31/15

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

Certification or Audit: May 19, 2015 (Annual Source Test)
Process Unit Description: LM-2500 Gas Turbine (Cogen I)

Total Source Operating
Time in Reporting Period: 7894.7

SOURCE TEST SUMMARY

Pollutant	Measured Emissions	Permit Limit
Oxides of Nitrogen, ppm @15% O ₂	22.3	24
Carbon Monoxide, lb/hr	25.00	54.98

Refer to Horizon Test report # P27-065-FRB for additional details.

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

SUMMARY REPORT
ANNUAL OPERATING HOURS AND SOURCE TEST RESULTS

Reporting Period Dates: From 1/1/15 through 12/31/15

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

Certification or Audit: March 11, 2015 (Annual Source Test)
Process Unit Description: LM-6000 Gas Turbine (Cogen II)

Total Source Operating
Time in Reporting Period: 8481.0

SOURCE TEST SUMMARY

Pollutant	Measured Emissions	Permit Limit
Oxides of Nitrogen, ppm @ 15% O ₂	2.28	2.5
Carbon Monoxide, lb/hour	6.00	6.35
Reactive Organic Compounds, ppm @ 15%	< 0.34	2.0
Ammonia, ppm @ 15% O ₂	1.21	20

Please refer to Horizon Test report # P27-065-FR COMP for additional details.



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION SIGNATURE COVER FORM

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

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

Confidentiality

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

Certification by Responsible Official

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

Signature and Title of Responsible Official: <i>Kara Poeder</i> Title: <i>P+G Oxnard Plant Manager</i>	Date: <i>2/12/16</i>
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Time Period Covered by Compliance Certification <i>01, 01, 15</i> (MM/DD/YY) to <i>12, 31, 15</i> (MM/DD/YY)

2015 Reporting Year

Annual Title V Compliance Certification

For

The Procter & Gamble Paper Products Company
Oxnard, CA Facility

VCAPCD Permit No. 00015

Contact:

Kyle Field
Site Environmental Leader
805-485-8871 x2408
field.ka@pg.com

Permit Section: 1

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

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

Permit Section: 2

Permitted Equipment and Applicable Requirements Table

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

Permit Section: 3

Permitted Throughput and Consumption Limit Table



Ventura County Air
Pollution Control
District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

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

Permit Section: 4

Permitted Emissions Table

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

Permit Section: 5

Exempt Equipment List (Insignificant Activities Table)

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

Permit Section: 6

Specific Applicable Requirements (Attachments)



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

<p>A. Attachment # or Permit Condition #: Section 6 – Attachment 74.9N7 (11/08/05)</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Stationary Combustion Engines</p> <p>Condition 1 - Emergency or Maintenance Engine Operation <50 hrs/calendar yr</p> <p>Condition 2- Emergency Engines equipped with operating, non resettable, elapsed hour meters.</p> <p>Condition 3 - Records for each emergency engine should include: Engine manufacturer, model number, operator identification number and location.</p> <p>Condition 4 - Report annual hours of maintenance operation to the District annually by Feb 15.</p>	<p>E. Source test reference method N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1 – Fire/Emergency and Maintenance hr runtimes tracked in monthly log</p> <p>Condition 2 – All engines are equipped with a non-resettable hour meter</p> <p>Condition 3 & 4 - Emergency Diesel Engine Annual Report forms are submitted to the District</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

<p>A. Attachment # or Permit Condition #: Section 6 - 74.15 N.1</p>	<p>D. Frequency of monitoring: Biennial</p>
<p>B. Description: Boilers, Heater Treaters, Steam Generators, and Process Heaters</p> <p>Condition 1 – Emissions: NOx < 40 ppmvd, CO < 400 ppmvd</p> <p>Condition 2 – Source Tested every 24 months using ARB Method 100</p> <p>Condition 3.a-b - Alternate Fuel Use limitations</p> <p>Condition 4 – Startup emissions exemption</p> <p>Condition 5 – Recordkeeping: Alternate Fuels, Biennial Source test report</p> <p>Condition 6 – Flue Gas Recirculation requirements per Section 7</p>	<p>E. Source test reference method: Source Test Summary Form 1 of 4</p> <p>ARB Method 100: NOx CO Stack Gas O2</p>
<p>C. Method of monitoring: Condition 1 & 2 -3/13/2015 Source Test demonstrated compliance</p> <p>Condition 3 – Only Natural Gas was used for the 2015 calendar year.</p> <p>Condition 4 – Instructional Condition; Certification not applicable.</p> <p>Condition 5 – No alternate fuel utilized. Source Test report furnished to District on time.</p> <p>Condition 6 – Compliance with applicable Section 7 flue gas recirculation requirements.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

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



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

A. Attachment # or Permit Condition #:

Section 6 – Attachment 103N5 (02/09/99)

D. Frequency of monitoring:
Monthly

B. Description: Boiler Capacity Factor

Condition 1 – Operate at less than 30% Capacity Factor (CF) for CEMs exemption

Condition 2 – Install CEMs upon request of District

Condition 3 – Maintain monthly fuel consumption records and submit annual capacity factor calculation to demonstrate unit maintains < 30% CF each year.

E. Source test reference method
N/A

C. Method of monitoring:

Condition 1 – Operate at less than 30% Capacity Factor for CEMs exemption

Condition 2 – Install CEMs upon request of District

Condition 3 – Monthly fuel records and annual capacity factor calculation

F. Currently in Compliance?
YES

G. Compliance Status:
CONTINUOUS

H. *Excursions, Exceedence, or other non-compliance:
NO



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

<p>A. Attachment # or Permit Condition #: Section 6 – Attachment STRMLN15LM6000-NOx-rev291</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: LM6000 Gas Turbine Based Cogeneration Unit</p> <p>Condition 1, 2, 4, & 6 - NOx < 2.5 ppmvd avg. @ 15% O2 over 3 hr. period, Annual Source Test, and CEMs, ROC <2.0 ppmvd @ 15% O2 average over 3 consecutive hrs. Operate Oxidation Catalyst & test annually, Outlet Ammonia < 20 ppmvd verified annually via source test, PM < 3.08 lbs/MMscf & source test using ARB Method 5 upon District request</p> <p>Condition 3: Emissions Exemption: 12 hr cold startup, 3 hr normal-startup, 2 hr unplanned load changes, and 1 hr shutdown</p> <p>Condition 5.a-f - Source Test Annually at normal operating load. Test Notification and protocol submitted 15 days in advance with report submitted within 45 days of test to include permit specified parameters</p> <p>Condition 7.a-l & 8.a-c - Operate and maintain CEMs & record permit specified data, CEMs calibration and maintenance per 40 CFR, part 51, Appendix P, Sections 3.0 through 3.9.5</p> <p>Condition 9 - Written Notification of monitored emission standards violations within 96 hours</p> <p>Condition 10.a-d & 11 - Permanent CEMs records, to include permit specified data, Upon request submit CEMs data to District</p> <p>Condition 12 & 13 - CEMs data reduced per 40 CFR, part 51, appendix P, paragraphs 5.0 – 5.3.3. Records maintained per permit conditions</p> <p>Condition 14.a-b - Turbine Operating hours report & annual source test report</p>	<p>E. Source test reference method Source Test Summary Form 2 of 4</p> <p>EPA Method 20 -NOx ARB Method 100 -CO, O2 EPA Method 18 -ROC ASTM Method D 3588-91 -Fuel HV BAAQMD Method ST-1B-NH3</p>
<p>C. Method of monitoring: Condition 1, 2, 4, 5, & 6 – Annual source test conducted on March 11, 2015. Condition 2, 7, 10, 11, 13 – Recordkeeping. Condition 3 – Exemptions applied as required throughout the calendar year. Condition 5 – Utilize certified Source Test vendors, use specified test methods, and submit documentation per deadline requirements. Condition 8 - Maintenance via operators with assistance from CEM manufacturer. Condition 9 – Operational procedures ensure compliance with 96 hour reporting requirement. Condition 12 – Data Acquisition System data reduction and recordkeeping per specification. Condition 14 – Turbine report submitted semi-annually, source test submitted annually.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: INTERMITTENT</p> <p>H. *Excursions, Exceedence, or other non-compliance: YES 2/22/15: NOx 3hr average exceeded 5/23/15: NOx 3hr average exceeded 7/29/15: NOx 3hr average exceeded</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

<p>A. Attachment # or Permit Condition #: Section 6 – Attachment STRMLN15LM2500-NOx,CO-rev 391</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: GE LM-2500 Gas Turbine Based Cogeneration Unit NOx and CO Applicable Requirements</p> <p>Condition 1 – 3 Hour NOx average < 24 ppmvd @ 15% O2 while burning Natural Gas Condition 2 – Emissions Exemption: 1 hr for startup & shutdown Condition 3 – Source Test Annually at normal operating load. Test Notification and protocol submitted 15 days in advance with report submitted within 45 days after test to include permit specified parameters. Condition 4 – Operate and maintain CEMs & record permit specified data. Condition 5 – CEMs calibration and maintenance per 40 CFR, part 51, Appendix P, Sections 3.0 through 3.9.5. Condition 6 – Written Notification of emissions violations within 96 hours. Condition 7 – Permanent CEMs records, to include permit specified data. Condition 8 – Upon request submit CEMs data to District. Condition 9 – CEMs data reduced per 40 CFR, part 51, appendix P, paragraphs 5.0 – 5.3.3. Condition 10 – Records maintained per permit conditions. Condition 11 – Turbine Operating hours report & annual source test report.</p>	<p>E. Source test reference method See Source Test Summary Form 3 of 4</p> <p>EPA Method 20 -NOx ARB Method 100 -CO, O2 ASTM Method D 3588-91 -Fuel HV</p>
<p>C. Method of monitoring:</p> <p>Condition 1, 3 – Annual source performed on May 19, 2015 Condition 1, 2, 4, 7, 8, 9, 10 – Recordkeeping Condition 5 – Maintenance via operators with assistance from CEMs manufacturer Condition 6 – Operational procedures ensure compliance with 96 hour reporting requirement Condition 11 – Turbine report submitted semi-annually, source test submitted annually</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

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



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

A. Attachment # or Permit Condition #: Section 6 – Attachment NESHAP KK	D. Frequency of monitoring: Monthly
B. Description: 40 CFR Part 63 Subpart KK Applicable Requirements Condition 1 – Use < 10 Ton per 12 month rolling period of each HAP Condition 2 – Use < 25 tons total per 12 month rolling period for all HAPs Condition 3 – HAP exclusion for various activities Condition 4 – Considered Area Source if it complies with HAP limitations Condition 5 – Maintain monthly records and calculations of HAP materials and their HAP fractions Condition 6 – Provided 40 CFR 63.9(b) Notification	E. Source test reference method N/A
C. Method of monitoring: Conditions 1 – 6: In 2015, site maintained non-major HAP status by emitting less than 10 TPY of any one HAP and less than 25 TPY of all HAPs. HAP emission and mass fraction monthly records are maintained as required by permit condition.	F. Currently in Compliance? YES G. Compliance Status: CONTINUOUS H. *Excursions, Exceedence, or other non-compliance: NO



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

<p>A. Attachment # or Permit Condition #: Section 6 - Attachment 40CFR63 ZZZZN3</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: 40 CFR Part 63 Subpart ZZZZ Applicable Requirements</p> <p><u>Condition 1:</u> Meet work practice standards including annual oil and filter changes, air cleaner inspections and belt/hose inspections. Report any delays due to emergency use to APCD.</p> <p><u>Condition 2:</u> Operate and maintain IC engines according to manufacturer's emission related instructions or per site plan to maintain and operate equipment consistent with good air pollution control practices.</p> <p><u>Condition 3:</u> RICE must be equipped with non-resettable hour meter.</p> <p><u>Condition 4:</u> Minimize idle time during startup and minimize startup time to safe engine loading time, not to exceed 30 minutes.</p> <p><u>Condition 5:</u> Limit non-emergency use of engines to no more than 100 hours per calendar year for maintenance and readiness testing and other allowed uses. Within this 100 hour allowance, limit hours for non-emergency non-maintenance/readiness testing (uses outlined in 63.6640 (f)) to no more than 50 hours per calendar year.</p> <p><u>Condition 6:</u> Maintain records of maintenance conducted on stationary emergency RICE and record hours of operation for emergency use and non-emergency uses to demonstrate compliance with Condition 5.</p> <p><u>Condition 7 & 8:</u> Non applicable condition - the site does not operate RICE for emergency demand response.</p> <p><u>Condition 9:</u> Annually certify that all engines operate in compliance with 40 CFR Part 63 Subpart ZZZZ.</p>	<p>E. Source test reference method N/A</p>
<p>C. Method of monitoring:</p> <p><u>Condition 1:</u> Maintain records to demonstrate that annual oil and filter changes, air cleaner inspections and annual belt/hose inspections are completed. Report any delays due to emergency use to APCD.</p> <p><u>Condition 2:</u> Operate and maintain IC engines according to site plans for maintenance and operation consistent with good air pollution control practices.</p> <p><u>Condition 3:</u> RICE are currently equipped with non-resettable hour meters.</p> <p><u>Condition 4:</u> Minimize idle time during startup and minimize startup time to safe engine loading time, not to exceed 30 minutes</p> <p><u>Condition 5:</u> Compliance with hour limitations is demonstrated by records of hours of operation for emergency, non-emergency and non-emergency/non- maintenance or readiness testing use.</p> <p><u>Condition 6:</u> Maintain records of maintenance conducted on stationary emergency RICE and record hours of operation for emergency use and non-emergency uses to demonstrate compliance with Condition 5.</p> <p><u>Conditions 7 & 8:</u> Non-applicable condition - the site does not operate RICE for emergency demand response.</p> <p><u>Condition 9:</u> Annual Subpart ZZZZ compliance certification is satisfied by submitting Annual Emergency Diesel Engine form for each applicable unit.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>

Permit Section: 7

Permit Specific Conditions (Attachments)



Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

<p>A. Attachment # or Permit Condition #:</p> <p>Section 7 – Attachment PO00015PC3-rev351</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: 2X Papermachine Hot Air Furnace and “Yankee” Hood Furnace Requirements</p> <p>Condition 1 –Emission limitations: NOx < 0.08 lb./MMBTU, CO < 0.045 lb./MMBTU</p> <p>Condition 2 –Fuel and air settings locked in position as specified in permit. Settings recorded every 6 months</p> <p>Condition 3 – Source test the Predryer Furnace before March 31, 2018 using ARB Method 100 for NOx, CO and O2. Notification & Test Protocol to District 15 days in advance. Report within 45 after test.</p> <p>Condition 4 – Perform a Screening Analysis with portable analyzer or perform a Source Test on the Yankee Hot Air Furnace once every 24 months using ARB Method 100 for NOx, CO and O2. Notification & Test Protocol to District 15 days in advance. Report within 45 after test.</p>	<p>E. Source test reference method: ARB Method 100: NOx CO Stack Gas O2 See Source Test Form 4 of 4</p>
<p>C. Method of monitoring:</p> <p>Condition 1 - Both Furnaces demonstrated compliance to the NOx and CO limits per their last Source Test</p> <p>Condition 2 – Fuel Linkage settings were monitored in January, April, and September to meet requirement</p> <p>Condition 3 - Condition requirements were met as demonstrated in the most recently submitted Source Test Report.</p> <p>Condition 4 - Condition requirements were met as demonstrated in the most recently submitted Source Test Report.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, exceedances, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

A. Attachment # or Permit Condition #:

Section 7 – Attachment PO00015PC7-rev391

D. Frequency of monitoring:
Monthly

B. Description: Federal PSD Permit Requirements- Cogeneration Turbine (LM-6000), Cogeneration Turbine (LM-2500), Babcock & Wilcox Steam Boiler, 1X Paper Machine Hot Air Furnace, and 1X Papermachine "Yankee" Hood Furnace

Condition 1 – If request increase in permitted NOx emissions for specified combustion sources above 250 TPY, submit PSD application for LM6000 turbine

E. Source test reference method
N/A

C. Method of monitoring:

Condition 1 – If request increase in NOx emissions in excess of 250 TPY, will submit PSD application for LM6000 turbine.

F. Currently in Compliance?
YES

G. Compliance Status:
CONTINUOUS

H. *Excursions, Exceedence, or other non-compliance:
NO



Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

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

Permit Section: 8

General Applicable Requirements (Attachments)



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

A. Attachment # or Permit Condition #: Section 8 – Attachment Rule 50 (04/13/04)	D. Frequency of monitoring: Monthly
B. Description: Opacity Condition 1 – 3 Minute emissions in hour less than 20% Opacity Condition 2 – Routine Surveillance and record of visible emissions other than uncombined water Condition 3 – Annual compliance certification, including site survey Condition 4 – EPA Method 9 survey per District request	E. Source test reference method: N/A
C. Method of monitoring: Condition 1 & 2 – No visible emissions were observed in 2015 Condition 3 - Opacity Survey completed on June 5th, 2015 Condition 4 - Perform EPA Method 9 survey upon District request	F. Currently in Compliance? YES G. Compliance Status: CONTINUOUS H. *Excursions, Exceedence, or other non-compliance: NO



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Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

<p>A. Attachment # or Permit Condition #: Section 8 – Attachment 54.B.1 (01/14/14)</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Sulfur Compounds – Sulfur Emissions from Combustion Operations at Point of Discharge</p> <p>Condition 1 – Point of Discharge SO₂ concentrations < 300 ppmvd (corrected to 3% oxygen for boilers and 15% oxygen for turbines), from combustion operations specified.</p> <p>Condition 2 – Comply with fuel Sulfur content limits per Rule 64. No monitoring required.</p> <p>Condition 3 – Upon District Request determine point of Discharge concentrations of SO₂</p>	<p>E. Source test reference method: N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1 – Compliance with permit condition Attachment P00015PC2. Only PUC-quality natural gas and CARB approved diesel used on site in 2015</p> <p>Conditions 2 – Fuel Oil Sulfur Content provided by supplier at each delivery. Gaseous sulfur content meeting PUC Quality requirements. Data furnished to district upon request.</p> <p>Condition 3 – Furnish District with data upon request.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

<p>A. Attachment # or Permit Condition #: Section 8 - Attachment 54.B.2 (01/14/14)</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Sulfur compounds – SO2 Concentrations</p> <p>Condition 1 – Property Line SO2 concentrations: 1 hr. < 0.25 ppmvd, 24 hr. < 0.04 ppmvd</p> <p>Condition 2 - Property line 1 hour sulfur dioxide limit of 0.075 ppm</p> <p>Condition 3 – Provide fuel or exhaust analysis along with modeling data or other demonstration to District upon request</p> <p>Condition 4a-c – Upon District Request determine ground level concentrations of SO2</p>	<p>E. Source test reference method: N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1 - Compliance with permit condition Attachment P00015PC2. Only PUC-quality natural gas, and CARB approved diesel used on site in 2015</p> <p>Conditions 2 – If the District requires ambient air monitoring, test methods specified will be employed.</p> <p>Conditions 3 - Fuel Analysis provided by suppliers at request of facility. Exhaust analysis based on emissions factors incorporated into facility AB2588 Health Risk Assessment.</p> <p>Condition 4– Furnish District with data upon request.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

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



Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

<p>A. Attachment # or Permit Condition #: Section 8 – Attachment 64.B.2 (04/13/99)</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Sulfur Content of Fuels – Liquid Fuel Requirements</p> <p>Condition 1 – No liquid Fuel usage with sulfur content > 0.5% by weight</p> <p>Condition 2 – If only use ARB quality liquid fuel compliance is assured without monitoring</p> <p>Condition 3 – Requirements for use of non ARB liquid fuels</p>	<p>E. Source test reference method: N/A</p>
<p>C. Method of monitoring:</p> <p>Conditions 1 & 2 – Maintain records of exclusive use of ARB compliant liquid fuel used on site in 2015 – No other monitoring is required.</p> <p>Condition 3 – Monitor per permit requirements if use non-ARB quality liquid fuel</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

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

Permit Section: 9-11

General Requirements for Short-Term Activities (Attachments)

General Permit Conditions

Miscellaneous Federal Program Conditions



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

<p>A. Attachment # or Permit Condition #: Section 9 – Attachment 74.1</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Abrasive Blasting</p> <p>Condition 1.a-c: Abrasive Blasting shall be conducted indoors, using specified methods</p> <p>Condition 2.a-d: For Outdoor blasting use steel or iron shot/grit or utilize specified alternate methods</p> <p>Condition 3 – Adhere to Rule 74.1.B.2 requirements for pavement marking</p> <p>Condition 4 – Stucco and concrete blasting per Rule 74.1.B.3</p> <p>Condition 5 – Use California approved and labeled materials for abrasive blasting</p> <p>Condition 6 – Comply with visible emissions standard per rule 74.1.C.2</p> <p>Condition 7.a-e: Routine Surveillance and visual inspection of blasting operations. Surveillance to include permit specified recordkeeping.</p>	<p>E. Source test reference method: N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1.a-c: Abrasive Blasting shall be conducted indoors, using specified methods</p> <p>Condition 2.a-d: Approved abrasive blasting material was used for outdoor blasting.</p> <p>Condition 3 – Adhere to Rule 74.1.B.2 requirements for pavement marking</p> <p>Condition 4 – No stucco or concrete blasting occurred in 2015</p> <p>Condition 5 – Use California approved and labeled materials for abrasive blasting</p> <p>Condition 6 – Comply with visible emissions standard per rule 74.1.C.2</p> <p>Condition 7.a-e: Routine Surveillance and visual inspection of blasting operations. Surveillance to include permit specified recordkeeping.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: YES</p> <p>See Deviation Summary</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

A. Attachment # or Permit Condition #: Section 9 – Attachment 74.28	D. Frequency of monitoring: Monthly
B. Description: Asphalt Roofing Operations Condition 1 – Kettles shall operate with lids. Lid will not be opened unless temperature is < 150oF Condition 2 – Max Temperatures: Asphalt < 500oF, Coal tar pitch < 400oF Condition 3 – Lid to remained closed, and receiving containers to be covered Condition 4 – Kettle vents to remain closed at all times Condition 5 – Facility will verify Rule 74.28 requirements met during projects	E. Source test reference method N/A
C. Method of monitoring: Conditions 1-5: Internal administrative procedures. No applicable roofing occurred in 2015	F. Currently in Compliance? YES G. Compliance Status: CONTINUOUS H. *Excursions, Exceedence, or other non-compliance: NO



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

<p>A. Attachment # or Permit Condition #: Section 9 - Attachment 40 CFR 61.M</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: National Emissions Standards for Asbestos</p> <p>Condition 1 – Comply with 40 CFR part 61, Subpart M</p> <p>Condition 2 – Adhere to 40 CFR part 61.145 requirements for Demolition and Renovation.</p>	<p>E. Source test reference method N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1 – Site Asbestos abatement program managed consistent with 40 CFR Part 61, Subpart M. State certified contractors are utilized for ACM demolition and renovation. Adherence with 40 CFR Part 61.145 is mandatory for job approval.</p> <p>Condition 2 – ACM demolition and renovation are observed by site resources to ensure compliance with 40 CFR Part 61.145. Activities involving ACM recorded are filed with Site Environmental Leader. Notification is provided to District prior to ACM renovation or demolition for activities requiring notification.</p> <p>No applicable activities occurred during 2015.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

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

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

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

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

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

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



Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2015 - December 31, 2015

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

Source Tests



Ventura County Air
Pollution Control
District

ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: January 1, 2015- December 31, 2015

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

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



ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: January 1, 2015- December 31, 2015

A. Emission Unit Description: LM6000 Turbine			B. Pollutant NOx
C. Measured Emission Rate: 2.28 ppm @ 15% O2	D. Limited Emission Rate: 2.5 ppm @ 15% O2	E. Specific Source Test: P27-065-FRCOMP	F. Test Date 3/11/2015

A. Emission Unit Description: LM6000 Turbine			B. Pollutant CO
C. Measured Emission Rate: 6.00 lb/hour	D. Limited Emission Rate: 10.20 lb/hour	E. Specific Source Test: P27-065-FRCOMP	F. Test Date 3/11/2015

A. Emission Unit Description: LM6000 Turbine			B. Pollutant O2
C. Measured Emission Rate: 14.79 %	D. Limited Emission Rate: N/A	E. Specific Source Test: P27-065-FRCOMP	F. Test Date 3/11/2015

A. Emission Unit Description: LM6000 Turbine			B. Pollutant Heat Rate
C. Measured Emission Rate: 433.00 MMbtu/hour	D. Limited Emission Rate: N/A	E. Specific Source Test: P27-065-FRCOMP	F. Test Date 3/11/2015

A. Emission Unit Description: LM6000 Turbine			B. Pollutant NH3
C. Measured Emission Rate: 1.21 ppm @ 15% O2	D. Limited Emission Rate: 20 ppm @ 15% O2	E. Specific Source Test: P27-065-FRCOMP	F. Test Date 3/11/2015

A. Emission Unit Description: LM6000 Turbine			B. Pollutant ROC
C. Measured Emission Rate: < 0.19 lb/hour	D. Limited Emission Rate: 1.21 lb/hour	E. Specific Source Test: P27-065-FRCOMP	F. Test Date 3/11/2015



Ventura County Air
Pollution Control
District

ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: January 1, 2015- December 31, 2015

A. Emission Unit Description: LM2500 Turbine			B. Pollutant NOx
C. Measured Emission Rate: 22.30 ppm @ 15% O2	D. Limited Emission Rate: 24 ppm @ 15% O2	E. Specific Source Test: P27-065-FRB	F. Test Date 5/19/2015

A. Emission Unit Description: LM2500 Turbine			B. Pollutant CO
C. Measured Emission Rate: 25.00 lb/hour	D. Limited Emission Rate: 180.13 lb/hour	E. Specific Source Test: P27-065-FRB	F. Test Date 5/19/2015

A. Emission Unit Description: LM2500 Turbine			B. Pollutant O2
C. Measured Emission Rate: 14.50 %	D. Limited Emission Rate: N/A	E. Specific Source Test: P27-065-FRB	F. Test Date 5/19/2015

A. Emission Unit Description: LM2500 Turbine			B. Pollutant Heat Rate
C. Measured Emission Rate: 226.00 MMBtu/hour	D. Limited Emission Rate: N/A	E. Specific Source Test: P27-065-FRB	F. Test Date 5/19/2015



ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: January 1, 2015- December 31, 2015

A. Emission Unit Description: 2X Predryer Hot Air Furnace (70 Mmbtu/hour)			B. Pollutant NOx
C. Measured Emission Rate: 0.0135 lb/Mmbtu	D. Limited Emission Rate: 0.080 lb/Mmbtu	E. Specific Source Test: P27-056-FR	F. Test Date 9/26/2012

A. Emission Unit Description: 2X Predryer Hot Air Furnace (70 Mmbtu/hour)			B. Pollutant CO
C. Measured Emission Rate: 0.0157 lb/Mmbtu	D. Limited Emission Rate: 0.045 lb/Mmbtu	E. Specific Source Test: P27-056-FR	F. Test Date 9/26/2012

A. Emission Unit Description: 2X Predryer Hot Air Furnace (70 Mmbtu/hour)			B. Pollutant O2
C. Measured Emission Rate: 14.91 %	D. Limited Emission Rate: N/A	E. Specific Source Test: P27-056-FR	F. Test Date 9/26/2012

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

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

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

Deviations



DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 01/01/2015 to 12/31/2015

<p>A. Attachment # or Permit Condition #: Attachment STRMLN15LM6000- NOx, rev291, Condition 1 / Rule 103 B.1</p> <p>Note: Previously reported in Semi-Annual Deviation report on 8/15/15</p>	<p>B. Equipment description: 49.9 MW GE Natural Gas Cogeneration Turbine LM-6000</p>	<p>C. Deviation Period: Date: 2/22/2015 Time Begin: 08:36 Time End: 09:04</p> <p>When Discovered: <i>A 100623</i> Date: 02/22/2015 Time: 08:41</p>
<p>D. Parameters monitored: NOx 3 hour average ppmvd @ 15% O2</p>	<p>E. Limit: 2.5 ppmvd @ 15% O2</p>	<p>F. Actual: > 2.5 ppmvd @ 15% O2</p>
<p>G. Probable Cause of Deviation A circuit failure occurred in Ammonia Vaporizer System</p>		<p>H. Corrective actions taken: The cogeneration unit was taken off line for @ 40 hours to repair, replace components, and optimize the Ammonia Vaporization System per manufacturer recommendations.</p> <p>More detail on the incident and follow-up can be found in the letter submitted to the district on 2/26/15.</p>

<p>A. Attachment # or Permit Condition #: Attachment STRMLN15LM6000- NOx, rev291, Condition 1 / Rule 103 B.1</p> <p>Note: Previously reported in Semi-Annual Deviation report on 8/15/15</p>	<p>B. Equipment description: 49.9 MW GE Natural Gas Cogeneration Turbine LM-6000</p>	<p>C. Deviation Period: Date: 5/23/2015 Time Begin: 22:00 Time End: 23:00</p> <p>When Discovered: Date: 5/23/2015 Time: 22:00</p>
<p>D. Parameters monitored: NOx 3 hour average ppmvd @ 15% O2</p>	<p>E. Limit: 2.5 ppmvd @ 15% O2</p>	<p>F. Actual: > 2.5 ppmvd @ 15% O2</p>
<p>G. Probable Cause of Deviation A manufacturer recommended component installed as a result of the February 22nd breakdown failed.</p>		<p>H. Corrective actions taken: A solid state contactor was removed and replaced with a readily available mechanical contactor. The mechanical contactor was placed on an annual replacement schedule.</p> <p>More detail on the incident and follow-up can be found in the letter submitted to the district on 5/27/15.</p>



DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 01/01/2015 to 12/31/2015

<p>A. Attachment # or Permit Condition #:</p> <p>Title V PO00015, Section 9, Attachment 74.1, Condition 5</p>	<p>B. Equipment description:</p> <p>Abrasive Blasting material - Kleen Blast #35 15% Blastox - arrived in unlabeled bags.</p>	<p>C. Deviation Period:</p> <p>Date: 7/9/15 Time Begin: 07:30 Date End: 7/24/15 Time End: 17:00</p> <p>When Discovered: Date: 7/7/15 Time: 14:46</p>
<p>D. Parameters monitored:</p> <p>Labeling of abrasive blast media.</p>	<p>E. Limit: All abrasive blast media must be labeled per Attachment 74.1 Condition 5</p>	<p>F. Actual:</p> <p>Abrasive blast media was not labeled.</p>
<p>G. Probable Cause of Deviation</p> <p>Vendor did not follow labeling standards for blast media as required.</p>		<p>H. Corrective actions taken:</p> <p>Spoke with Ken Hall and Eric Weatherbee from VCAPCD and received verbal and written alignment from district to use this particular blast media.</p>

<p>A. Attachment # or Permit Condition #:</p> <p>Attachment STRMLN15LM6000-NOx, rev291, Condition 1 / Rule 103 B.1</p>	<p>B. Equipment description:</p> <p>The 3 hour average for the LM6000 unit exceeded the allowable limit after inadvertent entry of the wrong set point for the Ammonia Control Valve.</p>	<p>C. Deviation Period:</p> <p>Date: 7/29/15 Time Begin: 14:53 Time End: 14:59</p> <p>Discovered:</p> <p>Date: 7/29/15 Time: 14:59</p>
<p>D. Parameters monitored:</p> <p>NOx 3 hour average ppmvd @ 15% O2</p>	<p>E. Limit:</p> <p>2.5 ppmvd @ 15% O2</p>	<p>F. Actual:</p> <p>> 2.5ppmvd @ 15% O2</p>
<p>G. Probable Cause of Deviation</p> <p>Wrong set point inadvertently entered for the Ammonia Control Valve.</p>		<p>H. Corrective actions taken:</p> <p>Reinforced operating procedures and expectations for system monitoring.</p> <p>More detail on the incident and follow-up can be found in the letter submitted to the district on 8/3/15.</p>



The Procter & Gamble Paper Products Co.
800 No. Rice Ave.
Oxnard, CA 93030
(805) 485-8871 phone
www.pg.com

February 12, 2016

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

Subject: Additional Documents in Support of Part 70 Compliance Certification for Report Year 2015

Mr. Searcy:

Enclosed are additional documents in support of The Procter & Gamble Paper Products Company's Oxnard facility, Part 70 Permit No. 00015 Compliance Certification for the January 1, 2015 through December 31, 2015 reporting period. If you have any questions concerning these documents or would like supplemental information not included with this submission, please contact me at your earliest convenience.

I can be reached at 805-485-8871, x2408 or field.ka@pg.com should you have any questions about this certification.

Respectfully,

Mr. Kyle Field
Site Environmental Leader

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

Ventura County
FEB 12 2016
Air Pollution Control District

Monthly Throughput

PO00015, Section 7, Attachment PO00015PC1 (see Section 3)

The Procter & Gamble Paper Products Company – Onward Plant

Month	Combustion						Papermaking						Converting						Facility Wide Total Emissions					
	ROC	NOx	PM	SOx	CO	NH3	ROC	NOx	PM	SOx	CO	NH3	ROC	NOx	PM	SOx	CO	NH3	ROC	NOx	PM	SOx	CO	NH3
	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)
Jan-15	1.23	8.11	1.42	0.14	9.45	0.41	2.02	--	--	--	--	--	0.19	--	--	--	--	--	3.43	8.11	1.42	0.14	9.45	0.41
Feb-15	1.13	8.56	1.35	0.12	9.02	0.42	2.68	--	--	--	--	--	0.24	--	--	--	--	--	4.05	8.56	1.35	0.12	9.02	0.42
Mar-15	1.25	8.52	1.43	0.15	7.73	0.42	3.28	--	--	--	--	--	0.26	--	--	--	--	--	4.79	8.52	1.43	0.15	7.73	0.42
Apr-15	1.07	7.06	1.22	0.13	13.12	0.55	2.13	--	--	--	--	--	0.20	--	--	--	--	--	3.41	7.06	1.22	0.13	13.12	0.55
May-15	1.11	9.45	1.25	0.14	12.48	0.62	3.46	--	--	--	--	--	0.25	--	--	--	--	--	4.83	9.45	1.25	0.14	12.48	0.62
Jun-15	1.24	8.54	1.43	0.14	14.89	0.56	2.79	--	--	--	--	--	0.19	--	--	--	--	--	4.22	8.54	1.43	0.14	14.89	0.56
Jul-15	1.27	8.14	1.47	0.15	11.49	0.60	3.20	--	--	--	--	--	0.31	--	--	--	--	--	4.79	8.14	1.47	0.15	11.49	0.60
Aug-15	1.25	7.79	1.44	0.15	10.89	0.60	2.75	--	--	--	--	--	0.26	--	--	--	--	--	4.26	7.79	1.44	0.15	10.89	0.60
Sep-15	1.24	7.59	1.43	0.14	10.09	0.61	2.54	--	--	--	--	--	0.24	--	--	--	--	--	4.01	7.59	1.43	0.14	10.09	0.61
Oct-15	1.19	7.77	1.35	0.15	11.14	0.64	2.56	--	--	--	--	--	0.24	--	--	--	--	--	4.00	7.77	1.35	0.15	11.14	0.64
Nov-15	0.90	7.31	1.00	0.12	9.84	0.49	2.79	--	--	--	--	--	0.25	--	--	--	--	--	3.94	7.31	1.00	0.12	9.84	0.49
Dec-15	1.12	7.95	1.26	0.14	11.07	0.66	2.67	--	--	--	--	--	0.20	--	--	--	--	--	3.99	7.95	1.26	0.14	11.07	0.66
12 Mo Total	14.0	96.8	16.1	1.7	131.2	6.6	32.9						2.8						49.7	96.8	16.1	1.7	131.2	6.6
Tons																								
Permit Limit																								

Current Actual in Tons versus Permit Limit

Capacity Factor: Babcock & Wilcox Boiler
 PO00015, Section 6, Attachment 103N, Condition 3

Fuel Usage	B301 (MMSCF)
Jan-15	1.68
Feb-15	9.45
Mar-15	1.18
Apr-15	0.38
May-15	3.10
Jun-15	0.69
Jul-15	0.07
Aug-15	0.07
Sep-15	0.07
Oct-15	0.09
Nov-15	7.95
Dec-15	1.47
12 Month Total	26.20

Annual Heat Input (AHI): _____

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

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

AHI = 26.2032984117587 * 1050

AHI = 27,513 MMBTU

Maximum Potential Heat Input (MPHI) _____

Capacity Factor (CF) _____

Rated Firing Capacity (RFC): 100 MMBTU/hr

Maximum Potential Operating Hours (MPOH): 8760 hrs

MPHI = RFC * MPOH

MPHI = 876,000 MMBTU

30% of MPHI (Maximum Allowable): 262,800 MMBTU

Maximum Allowable Rolling 12 month Fuel Usage: 250.29 MMSCF

Capacity Factor = Ratio of Annual Actual Heat Input to
 Maximum Potential Heat Input

CF = AHI / MPHI

CF = 0.0314081 Ratio

% CF = 3.1% (%CF)

**EMERGENCY DIESEL ENGINE
2015 ANNUAL REPORT FORM**

Reporting Period: January 1 through December 31, 2015
Report Due Date: February 15, 2016

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

Facility Name:	Procter & Gamble Paper Products		Permit No: 00015			
Facility Address:	800 North Rice Avenue		Facility Contact: Kyle Field, field.ka@pg.com			
City:	Oxnard, CA 93030		Phone: 805-484-8871 X 2408			
210 BHP	Clarke Detroit Diesel Allison, Inc. Diesel-Fired Emergency Engine, Model JU6HUF50, Serial No. PE6068T185639, I.D: Warehouse Pump, PG-4, used for fire suppression.					
Are the details listed above correct? If no, please make corrections.			Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Reporting Requirements for Calendar 2015						
	Date of Reading		Meter Reading			
First of 2015:	01/07/2015	First of 2015:	284.4			
End of 2015:	01/01/2016	End of 2015:	309.9			
Total annual hours for: Maintenance & Testing:			25.5			
Hours of Emergency use:			0.0			
Total Hours of operation:			25.5			
Has the engine listed above exceeded the permit limit for maintenance and testing? NO If yes, please explain here or attach additional pages:						
Signature of person supplying the information: "I certify that the above information is correct."						
Signature: <i>Kara Roeder</i>			Title: Plant Manager			
Print Name: Kara Roeder			Date: <i>2/12/16</i>			
Phone #: 805 485-8871 X 8924			Email: roeder.kc@pg.com			
Send report to: Barry Mamaghany or Ms. Chris Cote Ventura County Air Pollution Control			Barry: (805) 645-1446 barry@vcapcd.org			
District 669 County Square Drive, Second			Chris: (805) 645-1442 chrisc@vcapcd.org			
Floor Ventura, CA 93003			Fax: (805) 645-1444			
			Form#: 00015-50			

**EMERGENCY DIESEL ENGINE
2015 ANNUAL REPORT FORM**

Reporting Period: January 1 through December 31, 2015
Report Due Date: February 15, 2016

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

Facility Name:	Procter & Gamble Paper Products		Permit No: 00015	
Facility Address:	800 North Rice Avenue		Facility Contact: Kyle Field, field.ka@pg.com	
City:	Oxnard, CA 93030		Phone: 805-484-8871 X 2408	
210 BHP	Clarke Detroit Diesel Allison, Inc. Diesel-Fired Emergency Engine, Model JU6HUF50 L1211H, Serial No. PE6068T157094, I.D: Warehouse Pump, PG-5, used for fire suppression.			
Are the details listed above correct? If no, please make corrections.			Yes	<input checked="" type="checkbox"/>
Reporting Requirements for Calendar 2015				
	Date of Reading		Meter Reading	
First of 2015:	01/07/2015	First of 2015:	294.7	
End of 2015:	01/01/2016	End of 2015:	321.0	
Total annual hours for: Maintenance & Testing:			26.3	
Hours of Emergency use:			0.0	
Total Hours of operation:			26.3	
Has the engine listed above exceeded the permit limit for maintenance and testing? NO If yes, please explain here or attach additional pages:				
Signature of person supplying the information: "I certify that the above information is correct."				
Signature: <i>Kara Roeder</i>		Title: Plant Manager		
Print Name: Kara Roeder		Date: <i>2/12/16</i>		
Phone #: 805 485-8871 X 8924		Email: roeder.kc@pg.com		
Send report to: Barry Mamaghany or Ms. Chris Cote Ventura County Air Pollution Control		Barry: (805) 645-1446 barry@vcapcd.org		
District		Chris: (805) 645-1442 chris@vcapcd.org		
669 County Square Drive, Second		Fax: (805) 645-1444		
Floor		Form#: 00015-50		
Ventura, CA 93003				

**EMERGENCY DIESEL ENGINE
2015 ANNUAL REPORT FORM**

Reporting Period: January 1 through December 31, 2015
Report Due Date: February 15, 2016

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

Facility Name:	Procter & Gamble Paper Products		Permit No: 00015			
Facility Address:	800 North Rice Avenue		Facility Contact: Kyle Field, field.ka@pg.com			
City:	Oxnard, CA 93030		Phone: 805-484-8871 X 2408			
420 BHP	Caterpillar Diesel-Fired Emergency Standby Engine, Model 3406, Serial No 61808444, ID: Utility Yard Pump, PG-2, used for fire suppression					
Are the details listed above correct? If no, please make corrections.			Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Reporting Requirements for Calendar 2015						
	Date of Reading		Meter Reading			
First of 2015:	01/07/2015	First of 2015:	678.2			
End of 2015:	01/01/2016	End of 2015:	688			
Total annual hours for: Maintenance & Testing:			9.7			
Hours of Emergency use:			0.1			
Total Hours of operation:			9.8			
Has the engine listed above exceeded the permit limit for maintenance and testing? NO If yes, please explain here or attach additional pages:						
Signature of person supplying the information: "I certify that the above information is correct."						
Signature: <i>Kara Roeder</i>			Title: Plant Manager			
Print Name: Kara Roeder			Date: <i>2/12/16</i>			
Phone #: 805 485-8871 X 8924			Email: roeder.kc@pg.com			
Send report to: Barry Mamaghany or Ms. Chris Cote Ventura County Air Pollution Control			Barry: (805) 645-1446 barry@vcapcd.org			
District			Chris: (805) 645-1442 chris@vcapcd.org			
669 County Square Drive, Second			Fax: (805) 645-1444			
Floor			Form#: 00015-50			
Ventura, CA 93003						

**EMERGENCY DIESEL ENGINE
2015 ANNUAL REPORT FORM**

Reporting Period: January 1 through December 31, 2015
Report Due Date: February 15, 2016

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

Facility Name:	Procter & Gamble Paper Products	Permit No: 00015		
Facility Address:	800 North Rice Avenue	Facility Contact: Kyle Field, field.ka@pg.com		
City:	Oxnard, CA 93030	Phone: 805-484-8871 X 2408		
420 BHP	Caterpillar Diesel-Fired Emergency Standby Engine, Model 3406, Serial No 6TB10913, ID: Utility Yard Pump, PG-3, used for fire suppression			
Are the details listed above correct? If no, please make corrections.		Yes	X	No
Reporting Requirements for Calendar 2015				
	Date of Reading		Meter Reading	
First of 2015:	01/07/2015	First of 2015:	719.0	
End of 2015:	01/01/2016	End of 2015:	740.0	
Total annual hours for: Maintenance & Testing:			20.5	
Hours of Emergency use:			0.5	
Total Hours of operation:			21.0	
Has the engine listed above exceeded the permit limit for maintenance and testing? NO If yes, please explain here or attach additional pages:				
Signature of person supplying the information: "I certify that the above information is correct."				
Signature:	<i>Kara Roeder</i>	Title: Plant Manager		
Print Name: Kara Roeder		Date: <i>2/12/16</i>		
Phone #: 805 485-8871 X 8924		Email: roeder.kc@pg.com		
Send report to: Barry Mamaghany or Ms. Chris Cote Ventura County Air Pollution Control		Barry: (805) 645-1446 barry@vcapcd.org		
District		Chris: (805) 645-1442 chris@vcapcd.org		
Floor	669 County Square Drive, Second Ventura, CA 93003	Fax: (805) 645-1444		
		Form#: 00015-50		

Opacity Annual Formal Survey
Procter & Gamble Oxnard Plant

VCAPCD Part 70 Permit, Attachment 5D Compliance Document

Conducted On Date: 6/5/15 Time: 15:00
Conducted By: Kathleen Green Signature: Kathleen Green

Visible Emissions Certification # _____
Most Recent Certification Date _____

Permit Emission Points
Drawing - PG-3419820

Stack	Stack Height (ft)	Stack Dia (sq ft)	Emissions Unit	Emission Description	Stack Position	Visible Emissions other than Uncombined Water N - if there are no visible emissions for 2 3minutes Y - if there are visible emissions > 20% or No. 1 Ringelmann for 2 3minutes
S-1	62	2.10	Washer Wet Lapper	PM	When Fan motor on	NO
S-2	84	12.67	Cogen 2/LM6000 Turbine	Thermal Output with NOx, CO, SOx, PM, ROC, NH3	Damper closed when 2X is running	NO
S-3	27	4.40	B-301 Steam Boiler	Thermal Output with NOx, CO, SOx, PM, ROC	FGR closed during SU (1hr) only - 100% Exhaust - otherwise partial exhaust	NO

Stack S-4 is not a physical stack but represents the totals stacks from 1X process stacks 4A-4E

S-4A	56	4.72	1X PreDryer	Thermal Output with NOx, CO, SOx, PM, ROC HAF + Burners OR Cogen + Burners	Open when 1X running	NO
S-4B	-	-	Furnace Cooling	Hot Air Release from shell cooling	Open	NO
S-4C	-	-	HRB	Thermal Output, NOx, CO, SOx, PM, ROC	Normally Closed	NO
S-4D	50	9.63	Cogen 1/LM2500 Turbine	Thermal Output, NOx, CO, SOx, PM, ROC	Damper closed when 1X running	NO
S-4E	-	-	W/WL Broke Pulper vent	PM	Open vent	NO
S-5	-	-	1X Scrubber	PM	When Fan motor on	NO
S-6	-	-	2X Scrubber	PM	When Fan motor on	NO

Stack S-7 is not physical stack but represents the totals stacks from 2X NOTE - PreDryer Exhaust is the emission from the YHAF (after drying)

S-7A	74	12.22	2X PreDryer Exhaust (YHAF Stack)	Thermal Output with NOx, CO, SOx, PM, ROC, NH3 LM6000 + HAF + PD	Normally Open	NO
S-7B	-	-	Exhaust Diversion (# Stack)	Thermal Output with NOx, CO, SOx, PM, ROC, NH3	Normally Closed	NO
S-7C	-	-	Vacuum Stack	PM	Open Vent	NO
S-7D	-	-	Wet End (Former)	PM	Open Vent	NO
S-7E	-	-	2X Broke Pulper Vent	PM	Open Vent	NO
2			Fire Pump #2	CARB Fuel Combustion	Open vent	NO
3			Fire Pump #3	CARB Fuel Combustion	Open vent	NO
4			Fire Pump #4	CARB Fuel Combustion	Open vent	NO
5			Fire Pump #5	CARB Fuel Combustion	Open vent	NO

Any Other Visible Emissions? NO

Atmospheric Conditions: Scary Wind 7-10 mph



The P&G Paper Products Co.
800 North Rice Avenue
Oxnard, CA 93030
(805) 485-8871
www.pg.com

February 12, 2016

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

Ventura County
FEB 12 2016
Air Pollution Control District

Subject: Semi Annual Report - Permit to Operate No. 0015
Actual Annual Operating Hours for LM2500 and LM6000 Turbines
Report Period: 1/1/15– 12/31/15

Mr. Searcy:

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

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

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

If you have any questions, please contact me at (805) 485-8871 x2408 or field.ka@pg.com.

Respectfully,

Kyle Field
Site Environmental Leader

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



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>Kara Poeder</u></p> <p>Title: <u>PAG Oxnard Plant Manager</u></p>	<p>Date: <u>2/12/16</u></p>
--	-----------------------------

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

SUMMARY REPORT
ANNUAL OPERATING HOURS AND SOURCE TEST RESULTS

Reporting Period Dates: From 1/1/15 through 12/31/15

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

Certification or Audit: May 19, 2015 (Annual Source Test)
Process Unit Description: LM-2500 Gas Turbine (Cogen I)

Total Source Operating Time in Reporting Period: 7894.7

SOURCE TEST SUMMARY

Pollutant	Measured Emissions	Permit Limit
Oxides of Nitrogen, ppm @15% O ₂	22.3	24
Carbon Monoxide, lb/hr	25.00	54.98

Refer to Horizon Test report # P27-065-FRB for additional details.

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

SUMMARY REPORT
ANNUAL OPERATING HOURS AND SOURCE TEST RESULTS

Reporting Period Dates: From 1/1/15 through 12/31/15

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

Certification or Audit: March 11, 2015 (Annual Source Test)
Process Unit Description: LM-6000 Gas Turbine (Cogen II)

Total Source Operating Time in Reporting Period: 8481.0

SOURCE TEST SUMMARY

Pollutant	Measured Emissions	Permit Limit
Oxides of Nitrogen, ppm @ 15% O ₂	2.28	2.5
Carbon Monoxide, lb/hour	6.00	6.35
Reactive Organic Compounds, ppm @ 15%	< 0.34	2.0
Ammonia, ppm @ 15% O ₂	1.21	20

Please refer to Horizon Test report # P27-065-FR COMP for additional details.

Safety Data Sheet

Diesel Low Sulfur (LSD) and Ultra Low Sulfur Diesel (ULSD)

NFPA: Flammability



TESORO

SECTION 1. PRODUCT AND COMPANY IDENTIFICATION

Product name	:	Diesel Low Sulfur (LSD) and Ultra Low Sulfur Diesel (ULSD)		
Synonyms	:	CARB Diesel , 888100004478		
MSDS Number		888100004478	Version	2.34
Product Use Description				
Company	For: Tesoro Refining & Marketing Co. 19100 Ridgewood Parkway, San Antonio, TX 78259			
Tesoro Call Center		(877) 783-7676	Chemtrec (Emergency Contact)	(800) 424-9300

SECTION 2. HAZARDS IDENTIFICATION

Classifications

- Flammable Liquid – Category 3
- Skin Irritation – Category 2
- Eye Irritation – Category 2B
- Aspiration Hazard – Category 1
- Carcinogenicity – Category 2
- Acute Toxicity - Inhalation – Category 4
- Chronic Aquatic Toxicity – Category 2

Pictograms



Signal Word

Danger

Hazard Statements

Flammable liquid and vapor.
 May be fatal if swallowed and enters airways – do not siphon diesel by mouth.
 Causes skin irritation.
 Causes eye irritation.
 Suspected of causing skin cancer if repeated and prolonged skin contact occurs.
 Suspected of causing cancer in the respiratory system if repeated and prolonged over-exposure by inhalation occurs.
 May cause damage to liver, kidneys and nervous system by repeated and prolonged inhalation.

Toxic if inhaled.
May cause drowsiness or dizziness by inhalation.
Toxic to aquatic life with long lasting effects.

Precautionary statements**Prevention**

Obtain special instructions before use.
Do not handle until all safety precautions have been read and understood.
Keep away from heat, sparks, open flames, welding and hot surfaces.
No smoking.
Keep container tightly closed.
Ground and/or bond container and receiving equipment.
Use explosion-proof electrical equipment.
Use only non-sparking tools if tools are used in flammable atmosphere.
Take precautionary measures against static discharge.
Wear gloves, eye protection and face protection as needed to prevent skin and eye contact with liquid.
Wash hands or liquid-contacted skin thoroughly after handling.
Do not eat, drink or smoke when using this product.
Avoid breathing vapors or mists.
Use only outdoors or in a well-ventilated area.

Response

In case of fire: Use dry chemical, CO₂, water spray or fire fighting foam to extinguish.
If swallowed: Immediately call a poison center, doctor, hospital emergency room, medical clinic or 911. Do NOT induce vomiting. Rinse mouth.
If on skin (or hair): Take off immediately all contaminated clothing. Rinse skin with water or shower.
If in eye: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.
If skin or eye irritation persists, get medical attention.
If inhaled: Remove person to fresh air and keep comfortable for breathing. Immediately call or doctor or emergency medical provider. See Section 4 and Section 11 for medical treatment information.

Storage

Store in a well ventilated place. Keep cool. Store locked up. Keep container tightly closed. Use only approved containers.

Disposal

Dispose of contents/containers to approved disposal site in accordance with local, regional, national, and/or international regulations.

SECTION 3. COMPOSITION/INFORMATION ON INGREDIENTS

Component	CAS-No.	Weight %
Fuels, diesel, No 2; Gasoil - unspecified	68476-34-6	100%
Nonane	111-84-2	0 - 5%
Naphthalene	91-20-3	0 - 1%

1,2,4-Trimethylbenzene	95-63-6	0 - 2%
Xylene	1330-20-7	0 - 2%
Sulfur	7704-34-9	15 ppm maximum

SECTION 4. FIRST AID MEASURES

- Inhalation** : Move to fresh air. Give oxygen. If breathing is irregular or stopped, administer artificial respiration. Seek medical attention immediately.
- Skin contact** : Take off all contaminated clothing immediately. Wash off immediately with soap and plenty of water. Wash contaminated clothing before re-use. If skin irritation persists, seek medical attention immediately.
- Eye contact** : Remove contact lenses. Rinse thoroughly with plenty of water for at least 15 minutes. If symptoms persist, seek medical attention.
- Ingestion** : Do not induce vomiting without medical advice. If a person vomits when lying on his back, place him in the recovery position. Seek medical attention immediately.
- Notes to physician** : Symptoms: Dizziness, Discomfort, Headache, Nausea, Disorder, Vomiting, Lung edema, Liver disorders, Kidney disorders. Aspiration may cause pulmonary edema and pneumonitis.

SECTION 5. FIRE-FIGHTING MEASURES

- Suitable extinguishing media** : SMALL FIRES: Any extinguisher suitable for Class B fires, dry chemical, CO₂, water spray or fire fighting foam. LARGE FIRES: Water spray, fog or fire fighting foam. Water may be ineffective for fighting the fire, but may be used to cool fire-exposed containers. Keep containers and surroundings cool with water spray.
- Specific hazards during fire fighting** : Fire Hazard Do not use a solid water stream as it may scatter and spread fire. Cool closed containers exposed to fire with water spray.
- Special protective equipment for fire-fighters** : Wear self-contained breathing apparatus and protective suit. Use personal protective equipment.
- Further information** : Exposure to decomposition products may be a hazard to health. Isolate area around container involved in fire. Cool tanks, shells, and containers exposed to fire and excessive heat with water. For massive fires the use of unmanned hose holders or monitor nozzles may be advantageous to further minimize personnel exposure. Major fires may require withdrawal, allowing the tank to burn. Large storage tank fires typically require specially trained personnel and equipment to extinguish the fire, often including the need for properly applied fire fighting foam.

SECTION 6. ACCIDENTAL RELEASE MEASURES

- Personal precautions** : Evacuate nonessential personnel and remove or secure all ignition sources. Consider wind direction; stay upwind and uphill, if possible. Evaluate the direction of product travel, diking, sewers, etc. to contain spill areas. Spills may infiltrate subsurface soil and groundwater; professional assistance may be necessary to determine the extent of subsurface impact. Ensure adequate ventilation. Use personal protective equipment.

- Environmental precautions** : Carefully contain and stop the source of the spill, if safe to do so. Protect bodies of water by diking, absorbents, or absorbent boom, if possible. Do not flush down sewer or drainage systems, unless system is designed and permitted to handle such material. The use of fire fighting foam may be useful in certain situations to reduce vapors. The proper use of water spray may effectively disperse product vapors or the liquid itself, preventing contact with ignition sources or areas/equipment that require protection. Discharge into the environment must be avoided. If the product contaminates rivers and lakes or drains inform respective authorities.
- Methods for cleaning up** : Take up with sand or oil absorbing materials. Carefully shovel, scoop or sweep up into a waste container for reclamation or disposal - caution, flammable vapors may accumulate in closed containers. Response and clean-up crews must be properly trained and must utilize proper protective equipment (see Section 8).

SECTION 7. HANDLING AND STORAGE

- Precautions for safe handling** : Keep away from fire, sparks and heated surfaces. No smoking near areas where material is stored or handled. The product should only be stored and handled in areas with intrinsically safe electrical classification.
- : Hydrocarbon liquids including this product can act as a non-conductive flammable liquid (or static accumulators), and may form ignitable vapor-air mixtures in storage tanks or other containers. Precautions to prevent static-initiated fire or explosion during transfer, storage or handling, include but are not limited to these examples:
- (1) Ground and bond containers during product transfers. Grounding and bonding may not be adequate protection to prevent ignition or explosion of hydrocarbon liquids and vapors that are static accumulators.
 - (2) Special slow load procedures for "switch loading" must be followed to avoid the static ignition hazard that can exist when higher flash point material (such as fuel oil or diesel) is loaded into tanks previously containing low flash point products (such as gasoline or naphtha).
 - (3) Storage tank level floats must be effectively bonded.
- For more information on precautions to prevent static-initiated fire or explosion, see NFPA 77, Recommended Practice on Static Electricity (2007), and API Recommended Practice 2003, Protection Against Ignitions Arising Out of Static, Lightning, and Stray Currents (2008).
- Conditions for safe storage, including incompatibilities** : Keep away from flame, sparks, excessive temperatures and open flame. Use approved containers. Keep containers closed and clearly labeled. Empty or partially full product containers or vessels may contain explosive vapors. Do not pressurize, cut, heat, weld or expose containers to sources of ignition. Store in a well-ventilated area. The storage area should comply with NFPA 30 "Flammable and Combustible Liquid Code". The cleaning of tanks previously containing this product should follow API Recommended Practice (RP) 2013 "Cleaning Mobile Tanks In Flammable and Combustible Liquid Service" and API RP 2015 "Cleaning Petroleum Storage Tanks".
- : Keep away from food, drink and animal feed. Incompatible with oxidizing agents. Incompatible with acids.

SECTION 8. EXPOSURE CONTROLS / PERSONAL PROTECTION

Exposure Guidelines

List	Components	CAS-No.	Type:	Value
OSHA Z1	Xylene	1330-20-7	PEL	100 ppm 435 mg/m ³
	Naphthalene	91-20-3	PEL	10 ppm 50 mg/m ³
ACGIH	Diesel Fuel	68476-30-2	TWA	100 mg/m ³
	Xylene	1330-20-7	TWA	100 ppm
		1330-20-7	STEL	150 ppm
	Naphthalene	91-20-3	TWA	10 ppm
		91-20-3	STEL	15 ppm
	Nonane	111-84-2	TWA	200 ppm

- Engineering measures** : Use adequate ventilation to keep gas and vapor concentrations of this product below occupational exposure and flammability limits, particularly in confined spaces. Use only intrinsically safe electrical equipment approved for use in classified areas.
- Eye protection** : Safety glasses or goggles are recommended where there is a possibility of splashing or spraying.
- Hand protection** : Gloves constructed of nitrile, neoprene, or PVC are recommended. Consult manufacturer specifications for further information.
- Skin and body protection** : If needed to prevent skin contact, chemical protective clothing such as of DuPont TyChem®, Saranex or equivalent recommended based on degree of exposure. The resistance of specific material may vary from product to product as well as with degree of exposure.
- Respiratory protection** : A NIOSH/MSHA-approved air-purifying respirator with organic vapor cartridges or canister may be permissible under certain circumstances where airborne concentrations are or may be expected to exceed exposure limits or for odor or irritation. Protection provided by air-purifying respirators is limited. Refer to OSHA 29 CFR 1910.134, ANSI Z88.2-1992, NIOSH Respirator Decision Logic, and the manufacturer for additional guidance on respiratory protection selection. Use a NIOSH/MSHA-approved positive-pressure supplied-air respirator if there is a potential for uncontrolled release, exposure levels are not known, in oxygen-deficient atmospheres, or any other circumstance where an air-purifying respirator may not provide adequate protection.
- Work / Hygiene practices** : Where potential for splash exposure exist emergency eye wash capability should be available. Refer to ANSI Z238.1 or manufacturers instruction for specific requirements relating to care and use of emergency eye care equipment. Use good personal hygiene practices. Avoid repeated and/or prolonged skin exposure. Wash hands before eating, drinking, smoking, or using toilet facilities. Do not use as a cleaning solvent on the skin. Do not use solvents or harsh abrasive skin cleaners for washing this product from exposed skin areas. Waterless hand cleaners are effective. Promptly remove contaminated clothing and launder before reuse. Use care when laundering to prevent the formation of flammable vapors which could ignite via washer or dryer. Consider the need to discard contaminated leather shoes and gloves.

SECTION 9. PHYSICAL AND CHEMICAL PROPERTIES

Appearance	Clear to straw colored liquid
Odor	Characteristic petroleum or kerosene-like odor
Odor threshold	0.1 - 1 ppm typically reported
pH	Not applicable
Melting point/freezing point	Gel point can be about -15°F; freezing requires laboratory conditions
Initial boiling point & range	154 - 372 °C (310° - 702 °F)
Flash point	38°C Minimum for #1 Diesel, 52°C Minimum for #2 Diesel
Evaporation rate	Higher initially and declining as lighter components evaporate
Flammability (solid, gas)	Flammable vapor released by liquid
Upper explosive limit	6.5 %(V)
Lower explosive limit	0.6 %(V)
Vapor pressure	< 2 mm Hg at 20 °C
Vapor density (air = 1)	> 4.5
Relative density (water = 1)	0.86 g/mL
Solubility (in water)	0.0005 g/100 mL
Partition coefficient (n-octanol/water)	> 3.3 as log Pow
Auto-ignition temperature	257 °C (495 °F)
Decomposition temperature	Will evaporate or boil and possibly ignite before decomposition occurs.
Kinematic viscosity	1 to 6 mm ² /s range reported for No.1 or No.2 diesel at ambient temperatures
Conductivity (conductivity can be reduced by environmental factors such as a decrease in temperature	Diesel Fuel Oils at terminal load rack: At least 25 pS/m Ultra Low Sulfur Diesel (ULSD) without conductivity additive: 0 pS/m to 5 pS/m ULSD at terminal load rack with conductivity additive: At least 50 pS/m JP-8 at terminal load rack: 150 pS/m to 600 pS/m

SECTION 10. STABILITY AND REACTIVITY

Reactivity	: Vapors may form explosive mixture with air. Hazardous polymerization does not occur.
Chemical stability	Stable under normal conditions.
Possibility of hazardous reactions	Can react with strong oxidizing agents, peroxides, acids and alkalies. Do not use with Viton or Fluorel gaskets or seals.
Conditions to avoid	Avoid high temperatures, open flames, sparks, welding, smoking and other ignition sources. Avoid static charge accumulation and discharge (see Section 7).

Hazardous decomposition products

Ignition and burning can release carbon monoxide, carbon dioxide, non-combusted hydrocarbons (smoke) and, depending on formulation, trace amounts of sulfur dioxide. Diesel exhaust particulates may be a lung hazard (see Section 11).

SECTION 11. TOXICOLOGICAL INFORMATION

Inhalation

Vapors or mists from this material can irritate the nose, throat, and lungs, and can cause signs and symptoms of central nervous system depression, depending on the concentration and duration of exposure.

Skin contact

Skin irritation leading to dermatitis may occur upon prolonged or repeated contact. Liquid may be absorbed through the skin in toxic amounts if large areas of skin are repeatedly exposed. Long-term, repeated skin contact may cause skin cancer.

Eye contact

Eye irritation may result from contact with liquid, mists, and/or vapors.

Ingestion

Harmful or fatal if swallowed. Do NOT induce vomiting. This material can irritate the mouth, throat, stomach, and cause nausea, vomiting, diarrhea and restlessness. Aspiration hazard if liquid is inhaled into lungs, particularly from vomiting after ingestion. Aspiration may result in chemical pneumonia, severe lung damage, respiratory failure and even death.

Target organs

Central nervous system, Eyes, Skin, Kidney, Liver

Further information

Studies have shown that similar products produce skin cancer or skin tumors in laboratory animals following repeated applications without washing or removal. The significance of this finding to human exposure has not been determined. Other studies with active skin carcinogens have shown that washing the animal's skin with soap and water between applications reduced tumor formation. Repeated over-exposure may cause liver and kidney injury. IARC classifies whole diesel fuel exhaust particulates as carcinogenic to humans (Group 1). NIOSH regards whole diesel fuel exhaust particulates as a potential cause of occupational lung cancer based on animal studies and limited evidence in humans.

Component:

Fuels, diesel, No 2; Gasoil - unspecified

68476-34-6

Acute oral toxicity LD50 rat
Dose: 5,001 mg/kg

Acute dermal toxicity LD50 rabbit
Dose: 2,001 mg/kg

Acute inhalation toxicity LC50 rat
Dose: 7.64 mg/l
Exposure time: 4 h

Skin irritation Classification: Irritating to skin.

Eye irritation Classification: Irritating to eyes.

Nonane

111-84-2

Acute oral toxicity LD50 mouse
Dose: 218 mg/kg

Acute inhalation toxicity LC50 rat
Exposure time: 4 h

Naphthalene

91-20-3

Acute oral toxicity LD50 rat
Dose: 2,001 mg/kg

		<u>Acute dermal toxicity</u> ,LD50 rat Dose: 2,501 mg/kg <u>Acute inhalation toxicity</u> ,LC50 rat Dose: 101 mg/l Exposure time: 4 h <u>Skin irritation</u> ,Classification: Irritating to skin. <u>Eye irritation</u> ,Classification: Irritating to eyes. <u>Carcinogenicity</u> : N11.00422130
1,2,4-Trimethylbenzene	95-63-6	<u>Acute inhalation toxicity</u> ,LC50 rat Dose: 18 mg/l Exposure time: 4 h <u>Skin irritation</u> ,Classification: Irritating to skin. <u>Eye irritation</u> ,Classification: Irritating to eyes.
Xylene	1330-20-7	<u>Acute oral toxicity</u> ,LD50 rat Dose: 2,840 mg/kg <u>Acute dermal toxicity</u> ,LD50 rabbit Dose: ca. 4,500 mg/kg <u>Acute inhalation toxicity</u> ,LC50 rat Dose: 6,350 mg/l Exposure time: 4 h <u>Skin irritation</u> ,Classification: Irritating to skin. <u>Eye irritation</u> ,Classification: Irritating to eyes.

Carcinogenicity

NTP	Naphthalene (CAS-No.: 91-20-3)
IARC	Naphthalene (CAS-No.: 91-20-3)
OSHA	No component of this product which is present at levels greater than or equal to 0.1 % is identified as a carcinogen or potential carcinogen by OSHA.
CA Prop 65	WARNING! This product contains a chemical known to the State of California to cause cancer. naphthalene (CAS-No.: 91-20-3)

SECTION 12. ECOLOGICAL INFORMATION

Additional ecological information : Keep out of sewers, drainage areas, and waterways. Report spills and releases, as applicable, under Federal and State regulations.

Component:

Diesel	68476-34-6	<u>Toxicity to fish</u> : LC50 Species: Jordanella floridae Dose: 54 mg/l
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Exposure time: 96 h

Toxicity to crustacea:
Species: Palaemonetes pugio
TLm (48 hour) = 3.4 mg/l

SECTION 13. DISPOSAL CONSIDERATIONS

Disposal : Dispose of container and unused contents in accordance with federal, state and local requirements.

SECTION 14. TRANSPORT INFORMATION**CFR**

Proper shipping name : DIESEL FUEL
UN-No. : UN1202 (NA 1993)
Class : 3
Packing group : III

TDG

Proper shipping name : DIESEL FUEL
UN-No. : UN1202 (NA 1993)
Class : 3
Packing group : III

IATA Cargo Transport

UN UN-No. : UN1202 (NA 1993)
Description of the goods : DIESEL FUEL
Class : 3
Packaging group : III
ICAO-Labels : 3
Packing instruction (cargo aircraft) : 366
Packing instruction (cargo aircraft) : Y344

IATA Passenger Transport

UN UN-No. : UN1202 (NA 1993)
Description of the goods : DIESEL FUEL
Class : 3
Packaging group : III
ICAO-Labels : 3
Packing instruction (passenger aircraft) : 355
Packing instruction (passenger aircraft) : Y344

IMDG-Code

UN-No. : UN 1202 (NA 1993)
Description of the goods : DIESEL FUEL
Class : 3
Packaging group : III
IMDG-Labels : 3

EmS Number
Marine pollutant

: F-E S-E
: No

SECTION 15. REGULATORY INFORMATION

	: CERCLA SECTION 103 and SARA SECTION 304 (RELEASE TO THE ENVIRONMENT) The CERCLA definition of hazardous substances contains a "petroleum exclusion" clause which exempts crude oil. Fractions of crude oil, and products (both finished and intermediate) from the crude oil refining process and any indigenous components of such from the CERCLA Section 103 reporting requirements. However, other federal reporting requirements, including SARA Section 304, as well as the Clean Water Act may still apply.
TSCA Status	: On TSCA Inventory
DSL Status	: All components of this product are on the Canadian DSL list.
SARA 311/312 Hazards	: Fire Hazard Acute Health Hazard Chronic Health Hazard
SARA III	US. EPA Emergency Planning and Community Right-To-Know Act (EPCRA) SARA Title III Section 313 Toxic Chemicals (40 CFR 372.65) - Supplier Notification Required
<u>Components</u>	<u>CAS-No.</u>
Xylene	1330-20-7
1,2,4-Trimethylbenzene	95-63-6
Naphthalene	91-20-3
PENN RTK	US. Pennsylvania Worker and Community Right-to-Know Law (34 Pa. Code Chap. 301-323)
<u>Components</u>	<u>CAS-No.</u>
Nonane	111-84-2
Naphthalene	91-20-3
1,2,4-Trimethylbenzene	95-63-6
xylene	1330-20-7
Fuels, diesel, No 2; Gasoil - unspecified	68476-34-6
MASS RTK	US. Massachusetts Commonwealth's Right-to-Know Law (Appendix A to 105 Code of Massachusetts Regulations Section 670.000)
<u>Components</u>	<u>CAS-No.</u>
Xylene	1330-20-7
1,2,4-Trimethylbenzene	95-63-6
Naphthalene	91-20-3
Nonane	111-84-2
NJ RTK	US. New Jersey Worker and Community Right-to-Know Act (New Jersey Statute Annotated Section 34:5A-5)
<u>Components</u>	<u>CAS-No.</u>
Nonane	111-84-2

Naphthalene	91-20-3
1,2,4-Trimethylbenzene	95-63-6
Xylene	1330-20-7
Fuels, diesel, No 2; Gasoil - unspecified	68476-34-6
California Prop. 65	: WARNING! This product contains a chemical known to the State of California to cause cancer.
Naphthalene	91-20-3

SECTION 16. OTHER INFORMATIONFurther information

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 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.

03/03/2014

1153, 1250, 1443, 1454, 1814, 1815, 1866, 1925