

**Atlantic Power Corporation**

EP Oxnard LLC  
550 Diaz Avenue  
Oxnard, CA 93030  
Ph. (805)345-6375 Fax. (805) 436-6598

October 22, 2015

Mr. Daniel Cho  
Ventura County Air Pollution Control District  
669 County Square Drive  
Ventura, CA 93003

RE: Semi-Annual Fuel Use Report

Dear Daniel:

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

1. The gas turbine is a General Electric LM6000, located at 550 Diaz Avenue, Oxnard CA.
2. Fuel usage for the 12 months ending September 30, 2015 was 1,475,136.6 mmbtu.  
The turbine was in operation for 3750 hours for the 12 months ending September 30, 2015.
3. The annual air test was performed on May 20, 2015.

Please contact me if you have any questions.

Sincerely,

Dave Sweigart  
General Manager

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Ventura County Air Pollution Control District

**Compliance Certification  
Permit Form  
Title V**

EF Oxnard LLC  
Oxnard Energy Facility  
October 22, 2015



Ventura County  
Air Pollution  
Control District

**ANNUAL COMPLIANCE CERTIFICATION  
SIGNATURE COVER FORM**

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


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

**Confidentiality**

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

**Certification by Responsible Official**

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

Signature and Title of Responsible Official:  Title: General Manager	Date: 10-23-15
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Time Period Covered by Compliance Certification <u>10</u> / <u>01</u> / <u>14</u> (MM/DD/YY) to <u>09</u> / <u>30</u> / <u>15</u> (MM/DD/YY)
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# ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 10 / 01 / 14 (MM/DD/YY) to 09 / 30 / 15 (MM/DD/YY)

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

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

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



Ventura County  
Air Pollution  
Control District

# ANNUAL COMPLIANCE CERTIFICATION

## SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 10 / 01 / 14 (MM/DD/YY) to 09 / 30 / 15 (MM/DD/YY)

A. Emission Unit Description: Gas Turbine GE LM6000 PC SPRINT			B. Pollutant: NOx
C. Measured Emission Rate: 1.7ppm @15% O2	D. Limited Emission Rate: 2.0ppm @ 15%O2	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 05/20/15

A. Emission Unit Description: Gas Turbine GE LM6000 PC SPRINT			B. Pollutant: NOx
C. Measured Emission Rate: 2.69 lb/hr	D. Limited Emission Rate: 41.44 lb/hr	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 05/20/15

A. Emission Unit Description: Gas Turbine GE LM6000 PC SPRINT			B. Pollutant: CO
C. Measured Emission Rate: 9.8ppm @ 15% O2	D. Limited Emission Rate: 24ppm @ 15%O2	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 05/20/15

A. Emission Unit Description: Gas Turbine GE LM6000 PC SPRINT			B. Pollutant: CO
C. Measured Emission Rate: 9.42 lb/hr	D. Limited Emission Rate: 24.21 lb/hr	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 05/20/15

A. Emission Unit Description: Gas Turbine GE LM6000 PC SPRINT			B. Pollutant: NH3
C. Measured Emission Rate: 3.4ppm @ 15%O2	D. Limited Emission Rate: 5.0ppm @ 15%O2	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 05/20/15



Ventura County  
Air Pollution  
Control District

## ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 10 / 01 / 14 (MM/DD/YY) to 09 / 30 / 15 (MM/DD/YY)

A. Emission Unit Description: Gas Turbine GE LM6000 PC SPRINT			B. Pollutant: NH3
C. Measured Emission Rate: 2.00 lb/hr	D. Limited Emission Rate: 3.06 lb/hr	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 05/20/15

A. Emission Unit Description: Gas Turbine GE LM6000 PC SPRINT			B. Pollutant: ROC
C. Measured Emission Rate: <1.7ppm @ 15%O2	D. Limited Emission Rate: 2.0ppm @ 15%O2	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 05/20/15

A. Emission Unit Description: Gas Turbine GE LM6000 PC SPRINT			B. Pollutant: ROC
C. Measured Emission Rate: <0.90 lb/hr	D. Limited Emission Rate: 1.15 lb/hr	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 05/20/15

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

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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 10 / 01 / 14 (MM/DD/YY) to 09 / 30 / 15 (MM/DD/YY)

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

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

<p>A. Attachment # or Permit Condition #: PO0214PC1 - Condition No. 1</p>	<p>D. Frequency of monitoring: Daily Meter Readings, CEMS calculates fuel use, Monthly CEMS Reports</p>
<p>B. Description: General Record Keeping for Fuel Limits</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Daily meter readings are incorporated into monthly production management records. CEMS calculates fuel use to date. SoCal Gas system contains historical usage in daily or monthly formats and provides 12 month historical usage on each month's bills. The LM6000 consumed 1434.812 MMSCF.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 10 / 01 / 14 (MM/DD/YY) to 09 / 30 / 15 (MM/DD/YY)

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

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

<p>A. Attachment # or Permit Condition #: PO0214PC1-Condition No. 4</p>	<p>D. Frequency of monitoring: Daily and monthly</p>
<p>B. Description: Emissions from the Gas Turbine Based Cogeneration Unit shall not exceed the following limits:  14.62 tons/year NOx, 98.42 tons/year CO</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: CEMS records daily emissions of both CO and NOx. Daily or 12 month totals for NOx are compared to applicable limits for compliance. The LM6000 produced a total of 16.026 tons CO during this certification period.  TheLM6000 produced 6.598 tons NOx during the certification period.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>            G. Compliance Status? (C or I): <u>C</u>            H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>            *If yes, attach Deviation Summary Form</p>





## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 10 / 01 / 14 (MM/DD/YY) to 09 / 30 / 15 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Rule 50</p>	<p>D. Frequency of monitoring: Annual Compliance Certification,</p>
<p>B. Description: Opacity</p>	<p>Observation made on 05/20/15</p>
<p>C. Method of monitoring: Certified observer conducted the survey. Highest opacity reading was indicated to be 0, as indicated on the Visible Emission Observation Form conducted on May 20, 2015.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Per EPA Method 9</p>
	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

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

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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification:   10   /   01   /   14   (MM/DD/YY) to   09   /   30   /   15   (MM/DD/YY)

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

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

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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 10 / 01 / 14 (MM/DD/YY) to 09 / 30 / 15 (MM/DD/YY)

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

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

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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 10 / 01 / 14 (MM/DD/YY) to 09 / 30 / 15 (MM/DD/YY)

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

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

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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 10 / 01 / 14 (MM/DD/YY) to 09 / 30 / 15 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 74.9N7 Rule 74.9.D.3</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Emergency Standby Fire Pump Engine, used for fire suppression. Annual testing hours and fuel type records.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: The Emergency Standby Engine, 121 BHP Caterpillar Diesel Fired, used for emergency fire suppression was tested weekly for 20 minutes per test run. The elapsed engine testing hours for the reporting period are 19.3 hours. Rule allows 50 hours per year testing. CARB ultra low sulfur diesel fuel is used by the engine.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: ATCM Engine N1</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Hours of operation for maintenance and testing of Emergency Standby Fire Pump Engine</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Weekly the Emergency Standby Fire Pump Engine is tested. The engine is operated for approximately 20 minutes during the testing. The engine is equipped with a non-resettable hour meter. The hours are logged before and after the test run and documented in the Weekly Safety Checklist. The annual engine testing hours are 19.3 hours. The emergency fire pump engine uses CARB ultra low sulfur content diesel fuel.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 10 / 01 / 14 (MM/DD/YY) to 09 / 30 / 15 (MM/DD/YY)

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

<p>A. Attachment # or Permit Condition #: 40 CFR Part 68, Risk Management Plans</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Lists of Regulated Substances &amp; Thresholds for Accidental Release Prevention</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: June 21, 1999, EF Oxnard, Inc. filed an RMP with the Oxnard CUPA. The RMP contained a hazard assessment; and accidental release prevention program; an emergency response program; a 5 year accident history &amp; a certification statement. On Dec. 27, 1999, EF Oxnard, Inc. held a public meeting to discuss the Offsite Consequence Analysis. The FBI was notified that the public meeting was held, by certified letter dated Jan. 4, 2000. The most recent RMP 5 year update was submitted on Jun. 21, 2014 to the EPA and Oxnard CUPA, The current Hazardous Waste and Hazardous Materials Management Regulatory Program Permit # 02-0030 dated July 29, 2015.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 10 / 01 / 14 (MM/DD/YY) to 09 / 30 / 15 (MM/DD/YY)

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

<p>A. Attachment # or Permit Condition #: 40 CFR Part 63, Subpart ZZZZ</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: NESHAPS for Stationary Reciprocating Internal Combustion Engines (RICE MACT)</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: By completion of the Emergency Diesel Engine Annual Reporting Form. The EF Oxnard LLC engine is a 1989 Caterpillar 3208, S/N 90N72137, BHP 121.0. Operating hour meter readings are taken each week, during the test run. The emergency fire pump diesel engine was operated for 20.6 hours. The form was submitted to the VCAPCD on January 8, 2015. The engine uses ultra low sulfur diesel fuel. Fuel purchase invoices reflect this along with the quantity purchased.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

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

ORIGIN ID: OXRA (805) 385-6375  
PATTY ALFARO  
E.F. OXNARD  
550 DIKZ AVENUE  
OXNARD, CA 93030  
UNITED STATES US

SHIP DATE: 28OCT15  
ACTWGT:  
CAD: 4338690UNMET3670

BILL SENDER

TO **MR. GERARDO RIOS, CHIEF**  
**OFFICE OF AIR DIVISION**  
**75 HAWTHORNE ST**  
**EPA REGION 9**  
**SAN FRANCISCO CA 94105**  
REF (415) 947-8000  
PO. DEPT.

539J3#01AG100



TRK# 7748 2597 2662  
0201

THU - 29 OCT 4:30P  
EXPRESS SAVER

**SH JCCA**  
94105  
CA-US SFO



**After printing this label:**

1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

**Warning:** Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on [fedex.com](http://fedex.com). FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$1,000, e.g. jewelry, precious metals, negotiable instruments and other items listed in our ServiceGuide. Written claims must be filed within strict time limits, see current FedEx Service Guide.



VISIBLE EMISSION OBSERVATION FORM

Test Point No. \_\_\_\_\_

Form No. 1

COMPANY NAME: **EF OXNARD**

STREET ADDRESS: **550 DIAZ AVE**

CITY: **OXNARD** STATE: **CA** ZIP: \_\_\_\_\_

PHONE (KEY CONTACT): **805 385 6377** SOURCE ID NUMBER: \_\_\_\_\_

PROCESS EQUIPMENT: **TURBINE** OPERATING MODE: **NORMAL**

CONTROL EQUIPMENT: \_\_\_\_\_ OPERATING MODE: \_\_\_\_\_

DESCRIBE EMISSION POINT: **TURBINE STACK EXHAUST**

HEIGHT ABOVE GROUND LEVEL: **90** HEIGHT RELATIVE TO OBSERVER: Start **90** End **90**

DISTANCE FROM OBSERVER: **50** DIRECTION FROM OBSERVER: Start **W** End **W**

DESCRIBE EMISSIONS: Start **Fugitive** End **Fugitive**

EMISSION COLOR: \_\_\_\_\_ F WATER DROPLET PLUME: \_\_\_\_\_

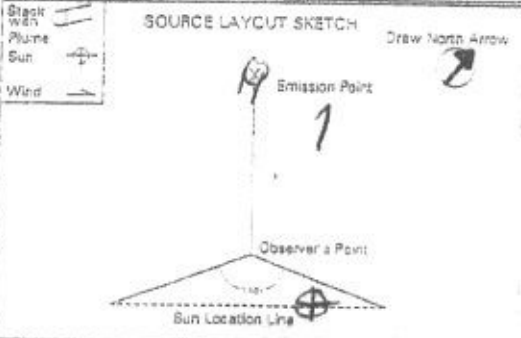
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED: Start **STACK EXIT** End **STACK EXIT**

DESCRIBE PLUME BACKGROUND: Start **SKY** End **SKY**

BACKGROUND COLOR: \_\_\_\_\_ SKY CONDITIONS: \_\_\_\_\_

WIND SPEED: Start **1 mph** End **2 mph** WIND DIRECTION: Start **NR** End **NR**

AMBIENT TEMP: Start **65** End **67** WET BULB TEMP: **60** RH, percent: **74**



OBSERVATION DATE	START TIME	END TIME	COMMENTS											
			Sec	0	15	30	45	Min	1	15	30	45		
5-20-15	9:10	10:10	0	0	0	0	31	0	0	0	0	0	0	0
			0	0	0	0	32	0	0	0	0	0	0	0
			0	0	0	0	33	0	0	0	0	0	0	0
			0	0	0	0	34	0	0	0	0	0	0	0
			0	0	0	0	35	0	0	0	0	0	0	0
			0	0	0	0	36	0	0	0	0	0	0	0
			0	0	0	0	37	0	0	0	0	0	0	0
			0	0	0	0	38	0	0	0	0	0	0	0
			0	0	0	0	39	0	0	0	0	0	0	0
			0	0	0	0	40	0	0	0	0	0	0	0
			0	0	0	0	41	0	0	0	0	0	0	0
			0	0	0	0	42	0	0	0	0	0	0	0
			0	0	0	0	43	0	0	0	0	0	0	0
			0	0	0	0	44	0	0	0	0	0	0	0
			0	0	0	0	45	0	0	0	0	0	0	0
			0	0	0	0	46	0	0	0	0	0	0	0
			0	0	0	0	47	0	0	0	0	0	0	0
			0	0	0	0	48	0	0	0	0	0	0	0
			0	0	0	0	49	0	0	0	0	0	0	0
			0	0	0	0	50	0	0	0	0	0	0	0
			0	0	0	0	51	0	0	0	0	0	0	0
			0	0	0	0	52	0	0	0	0	0	0	0
			0	0	0	0	53	0	0	0	0	0	0	0
			0	0	0	0	54	0	0	0	0	0	0	0
			0	0	0	0	55	0	0	0	0	0	0	0
			0	0	0	0	56	0	0	0	0	0	0	0
			0	0	0	0	57	0	0	0	0	0	0	0
			0	0	0	0	58	0	0	0	0	0	0	0
			0	0	0	0	59	0	0	0	0	0	0	0
			0	0	0	0	60	0	0	0	0	0	0	0

HIGHEST OPACITY READING IS 0 NUMBER OF READINGS AT HIGHEST % OPACITY IS 240

If any individual readings are greater than \_\_\_\_\_ % opacity and there are more than 3 readings of \_\_\_\_\_ % for the 1-hour period, then 3 hours thirty 6-minute averages are to be observed. This facility will be in violation of local air permit conditions if there are 13 or more reads at or above 30%.

Data Reduction

Set No.	Min	Opacity	
		Start-End	Su m Avg
1	1-3	0	0
2	7-12	0	0
3	13-15	0	0
4	19-24	0	0
5	25-30	0	0
6	31-36	0	0
7	37-42	0	0
8	43-48	0	0
9	49-54	0	0
10	55-60	0	0

Readings range from 0 to 0 % opacity



OBSERVER'S NAME (PRINT): **WES HART**

OBSERVER'S SIGNATURE: *Wes Hart* DATE: **5-20-15**

ORGANIZATION: **HIRX TESTING SERVICES INC**

CERTIFIED BY: **CARB - 50164** DATE: **4-30-15**

CONTINUED ON VEO FORM NUMBER \_\_\_\_\_

SKETCH FLOW DIAGRAM

## Daniel Cho

---

**From:** Paul Skopnik <pskopnik@atlanticpower.com>  
**Sent:** Friday, March 11, 2016 7:53 AM  
**To:** Daniel Cho  
**Subject:** RE: VEO Form  
**Attachments:** 2015 Opacity VEF 05202015.pdf

Hello Daniel,

Please find the attachment containing the VEO from 20 May 2015

Respectfully,

Paul

**Paul W. Skopnik** | Operations and Maintenance Manager – EF Oxnard LLC | Atlantic Power Corporation

550 Diaz Avenue | Oxnard, CA 93030

Office: (805) 385-6375x23 | Cell: (805) 857-2123 | Fax: (805) 486-6598

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**From:** Daniel Cho [<mailto:daniel@vcapcd.org>]  
**Sent:** Thursday, March 10, 2016 5:01 PM  
**To:** Paul Skopnik  
**Subject:** VEO Form

Hi Paul,

Can you send the Visible Emission Observation Form conducted on May 20,2015? Thank you.

## Daniel Cho

Air Quality Engineer I  
Ventura County Air Pollution Control District  
669 County Square Drive  
Ventura, CA 93003  
Tel : (805) 645-1413  
Fax : (805) 645-1444

Ventura County Air Pollution Control District

# Compliance Certification Permit Form Title V

RECEIVED  
VENTURA COUNTY  
A.P.C.D.  
OCT 22 2015

EF Oxnard LLC  
Oxnard Energy Facility  
October 22, 2015



Ventura County  
Air Pollution  
Control District

**ANNUAL COMPLIANCE CERTIFICATION  
SIGNATURE COVER FORM**

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

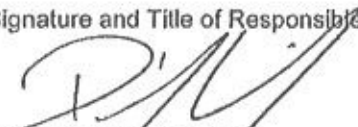
Mr. Gerardo Rios, Chief  
Permits Office (AIR-3)  
Office of Air Division  
EPA Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

**Confidentiality**

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

**Certification by Responsible Official**

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

Signature and Title of Responsible Official:  Title: General Manager	Date: 10-23-15
---	-------------------

Time Period Covered by Compliance Certification <u>10</u> / <u>01</u> / <u>14</u> (MM/DD/YY) to <u>09</u> / <u>30</u> / <u>15</u> (MM/DD/YY)
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# ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 10 / 01 / 14 (MM/DD/YY) to 09 / 30 / 15 (MM/DD/YY)

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

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

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



Ventura County  
Air Pollution  
Control District

## ANNUAL COMPLIANCE CERTIFICATION

### SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 10 / 01 / 14 (MM/DD/YY) to 09 / 30 / 15 (MM/DD/YY)

A. Emission Unit Description: Gas Turbine GE LM6000 PC SPRINT			B. Pollutant: NOx
C. Measured Emission Rate: 1.7ppm @15% O2	D. Limited Emission Rate: 2.0ppm @ 15%O2	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 05/20/15

A. Emission Unit Description: Gas Turbine GE LM6000 PC SPRINT			B. Pollutant: NOx
C. Measured Emission Rate: 2.69 lb/hr	D. Limited Emission Rate: 41.44 lb/hr	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 05/20/15

A. Emission Unit Description: Gas Turbine GE LM6000 PC SPRINT			B. Pollutant: CO
C. Measured Emission Rate: 9.8ppm @ 15% O2	D. Limited Emission Rate: 24ppm @ 15%O2	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 05/20/15

A. Emission Unit Description: Gas Turbine GE LM6000 PC SPRINT			B. Pollutant: CO
C. Measured Emission Rate: 9.42 lb/hr	D. Limited Emission Rate: 24.21 lb/hr	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 05/20/15

A. Emission Unit Description: Gas Turbine GE LM6000 PC SPRINT			B. Pollutant: NH3
C. Measured Emission Rate: 3.4ppm @ 15%O2	D. Limited Emission Rate: 5.0ppm @ 15%O2	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 05/20/15



Ventura County  
Air Pollution  
Control District

# ANNUAL COMPLIANCE CERTIFICATION

## SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 10 / 01 / 14 (MM/DD/YY) to 09 / 30 / 15 (MM/DD/YY)

A. Emission Unit Description: Gas Turbine GE LM6000 PC SPRINT			B. Pollutant: NH3
C. Measured Emission Rate: 2.00 lb/hr	D. Limited Emission Rate: 3.06 lb/hr	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 05/20/15

A. Emission Unit Description: Gas Turbine GE LM6000 PC SPRINT			B. Pollutant: ROC
C. Measured Emission Rate: <1.7ppm @ 15%O2	D. Limited Emission Rate: 2.0ppm @ 15%O2	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 05/20/15

A. Emission Unit Description: Gas Turbine GE LM6000 PC SPRINT			B. Pollutant: ROC
C. Measured Emission Rate: <0.90 lb/hr	D. Limited Emission Rate: 1.15 lb/hr	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 05/20/15

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

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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 10 / 01 / 14 (MM/DD/YY) to 09 / 30 / 15 (MM/DD/YY)

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

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

<p>A. Attachment # or Permit Condition #: PO0214PC1 - Condition No. 1</p>	<p>D. Frequency of monitoring: Daily Meter Readings, CEMS calculates fuel use, Monthly CEMS Reports</p>
<p>B. Description: General Record Keeping for Fuel Limits</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Daily meter readings are incorporated into monthly production management records. CEMS calculates fuel use to date. SoCal Gas system contains historical usage in daily or monthly formats and provides 12 month historical usage on each month's bills. The LM6000 consumed 1434.812 MMSCF.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>





Ventura County  
Air Pollution  
Control District

## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 10 / 01 / 14 (MM/DD/YY) to 09 / 30 / 15 (MM/DD/YY)

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

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

<p>A. Attachment # or Permit Condition #: PO0214PC1-Condition No. 4</p>	<p>D. Frequency of monitoring: Daily and monthly</p>
<p>B. Description: Emissions from the Gas Turbine Based Cogeneration Unit shall not exceed the following limits:  14.62 tons/year NOx, 98.42 tons/year CO</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: CEMS records daily emissions of both CO and NOx. Daily or 12 month totals for NOx are compared to applicable limits for compliance. The LM6000 produced a total of 16.026 tons CO during this certification period.  TheLM6000 produced 6.598 tons NOx during the certification period.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification:   10   /   01   /   14   (MM/DD/YY) to   09   /   30   /   15   (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Rule 50</p>	<p>D. Frequency of monitoring: Annual Compliance Certification,</p> <p>Observation made on 05/20/15</p>
<p>B. Description: Opacity</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Per EPA Method 9</p>
<p>C. Method of monitoring: Certified observer conducted the survey. Highest opacity reading was indicated to be 0, as indicated on the Visible Emission Observation Form conducted on May 20, 2015.</p>	<p>F. Currently in Compliance? (Y or N): <u>  Y  </u></p> <p>G. Compliance Status? (C or I): <u>  C  </u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>  N  </u></p> <p>*If yes, attach Deviation Summary Form</p>

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

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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 10 / 01 / 14 (MM/DD/YY) to 09 / 30 / 15 (MM/DD/YY)

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

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

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



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

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

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

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



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

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

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



Ventura County  
Air Pollution  
Control District

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<p>A. Attachment # or Permit Condition #: 74.9N7 Rule 74.9.D.3</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Emergency Standby Fire Pump Engine, used for fire suppression. Annual testing hours and fuel type records.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: The Emergency Standby Engine, 121 BHP Caterpillar Diesel Fired, used for emergency fire suppression was tested weekly for 20 minutes per test run. The elapsed engine testing hours for the reporting period are 19.3 hours. Rule allows 50 hours per year testing. CARB ultra low sulfur diesel fuel is used by the engine.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: ATCM Engine N1</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Hours of operation for maintenance and testing of Emergency Standby Fire Pump Engine</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Weekly the Emergency Standby Fire Pump Engine is tested. The engine is operated for approximately 20 minutes during the testing. The engine is equipped with a non-resettable hour meter. The hours are logged before and after the test run and documented in the Weekly Safety Checklist. The annual engine testing hours are 19.3 hours. The emergency fire pump engine uses CARB ultra low sulfur content diesel fuel.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

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



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

<p>A. Attachment # or Permit Condition #: 40 CFR Part 68, Risk Management Plans</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Lists of Regulated Substances &amp; Thresholds for Accidental Release Prevention</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: June 21, 1999, EF Oxnard, Inc. filed an RMP with the Oxnard CUPA. The RMP contained a hazard assessment; and accidental release prevention program; an emergency response program; a 5 year accident history &amp; a certification statement. On Dec. 27, 1999, EF Oxnard, Inc. held a public meeting to discuss the Offsite Consequence Analysis. The FBI was notified that the public meeting was held, by certified letter dated Jan. 4, 2000. The most recent RMP 5 year update was submitted on Jun. 21, 2014 to the EPA and Oxnard CUPA, The current Hazardous Waste and Hazardous Materials Management Regulatory Program Permit # 02-0030 dated July 29, 2015.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

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



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

<p>A. Attachment # or Permit Condition #: 40 CFR Part 63, Subpart ZZZZ</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: NESHAPS for Stationary Reciprocating Internal Combustion Engines (RICE MACT)</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: By completion of the Emergency Diesel Engine Annual Reporting Form. The EF Oxnard LLC engine is a 1989 Caterpillar 3208, S/N 90N72137, BHP 121.0. Operating hour meter readings are taken each week, during the test run. The emergency fire pump diesel engine was operated for 20.6 hours. The form was submitted to the VCAPCD on January 8, 2015. The engine uses ultra low sulfur diesel fuel. Fuel purchase invoices reflect this along with the quantity purchased.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

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