



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

February 15, 2017



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

Subject: RY2016 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, 2016 through December 31, 2016 reporting period. This submission also constitutes the Semi Annual Deviation Report for the time period January 1, 2016 – December 31, 2016.

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

Respectfully,

Ms. Kathleen Green  
Interim Site Environmental Leader

Cc: Mr. Gerardo Rios, Permits, Chief, US EPA Region IX  
Mr. Lelon Frazier, Plant Manager; P&G  
Mr. Kim Lim, Oxnard Plant HS&E Leader; P&G  
Mr. Kyle Field, SEL; P&G

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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:

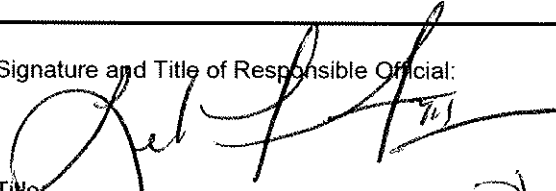
Mr. Gerardo Rios, Chief  
Permits Office (AIR-3)  
Office of Air Division  
EPA Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

**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:<br><br>Title: P + G OXNARD Plant Mgr | Date: 2/14/17 |
|--|---------------|

|   |
|---|
| Time Period Covered by Compliance Certification<br>01 / 01 / 2016 (MM/DD/YY) to 12 / 31 / 2016 (MM/DD/YY) |
|---|

# **2016 Reporting Year**

## **Annual Title V Compliance Certification**

For

The Procter & Gamble Paper Products Company  
Oxnard, CA Facility

VCAPCD Permit No. 00015

Contact: Kim Lim  
HS&E Leader  
805-485-8871  
Lim.ks@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, 2016 - December 31, 2016**

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

# 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, 2016 - December 31, 2016**

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| <p>A. Attachment # or Permit Condition #:<br/>Section 6 – Attachment 74.6 (11/11/03)</p>  | <p>D. Frequency of monitoring:<br/><b>Monthly</b></p>  |
| <p>B. Description: Surface Cleaning and Degreasing; Cold Cleaners</p> <p>Condition 11.a - Rule 74.6 exemptions; cleaning activities using Clean Air Solvent or a solvent with an ROC content no more than 25 grams per liter as applied.</p>  | <p>E. Source test reference method:<br/><b>N/A</b></p>   |
| <p>C. Method of monitoring:<br/>Solvents used in onsite cold cleaning equipment and operations meet the exemption requirement in Condition 11.a. because they are either less than 25 g/l or is certified as a CAS.</p> <p>10% solution of Armkleen 4 in 1 Cleaner contains &lt; 21 g/l ROC (per SDS 4/27/2015)<br/>QSOL 300 Cleaning Solvent is Certified Clean Air Solvent (per SDS 9/2/2014)</p> | <p>F. Currently in Compliance?<br/><b>YES</b></p> <p>G. Compliance Status:<br/><b>CONTINUOUS</b></p> <p>H. *Excursions, Exceedence, or other non-compliance:<br/><b>NO</b></p> |



Ventura County  
Air Pollution  
Control District

## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

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| <p>A. Attachment # or Permit Condition #:<br/>Section 6 – Attachment 74.9N7 (11/08/05)</p>  | <p>D. Frequency of monitoring:<br/><b>Monthly</b></p>  |
| <p>B. Description: Stationary Combustion Engines</p> <p>Condition 1 - Emergency or Maintenance Engine Operation &lt;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<br/><b>N/A</b></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 &amp; 4 - Emergency Diesel Engine Annual Report forms are submitted to the District</p>  | <p>F. Currently in Compliance?<br/><b>YES</b></p> <p>G. Compliance Status:<br/><b>CONTINUOUS</b></p> <p>H. *Excursions, Exceedence, or other non-compliance:<br/><b>NO</b></p> |



**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

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| <p>A. Attachment # or Permit Condition #:<br/>Section 6 - 74.15 N.1</p>  | <p>D. Frequency of monitoring: <b>Biennial</b></p>   |
| <p>B. Description: Boilers, Heater Treaters, Steam Generators, and Process Heaters</p> <p>Condition 1 – Emissions: NOx &lt; 40 ppmvd, CO &lt; 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:<br/><b>Source Test Summary Form 1 of 4</b></p> <p><b>ARB Method 100:</b><br/>NOx<br/>CO<br/>Stack Gas O2</p>   |
| <p>C. Method of monitoring:</p> <p>Condition 1 &amp; 2 -3/30/2016 Source Test demonstrated compliance</p> <p>Condition 3 – Only Natural Gas was used for the 2016 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? <b>YES</b></p> <p>G. <b>Compliance Status:</b><br/><b>INTERMITTENT</b></p> <p>H. <b>*Excursions, Exceedence, or other non-compliance: YES</b></p> <p><b>See Deviation Summary</b></p> |



**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

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| <p>A. Attachment # or Permit Condition #:<br/>Section 6 – Attachment 74.19N1-(6/14/11)</p>   | <p>D. Frequency of monitoring:<br/><b>Monthly</b></p>  |
| <p>B. Description: Graphic Arts Operations Without an Emissions Capture and Control System</p> <p>Condition 1: Only use flexographic inks &lt; 225 g/l<br/>Condition 2: Fountain Solutions meets specified limits<br/>Condition 3: Cleaning using approved ROC content and composite partial pressure Solvents<br/>Condition 4: Usage of Methylene Chloride Prohibited<br/>Condition 5.a-d: Any solvent cleaning operations must use only approved cleaning methods<br/>Condition 6: Closed Container Storage of Materials with ROC content<br/>Condition 7: Proper disposal of ROC Material Waste<br/>Condition 8.a-c: Maintain records (monthly) for inks and fountain solution usage<br/>Condition 9.a-e: Test Method utilization</p>   | <p>E. Source test reference method:<br/><b>N/A</b></p>   |
| <p>C. Method of monitoring:<br/>Condition 1 – Chemical Approval Process verifies only &lt;225 g/l ROC content inks are allowed on-site.<br/>Condition 2 &amp; 3 – Facility does not use Fountain Solution in Graphic Arts operations; only Solvent free, water based cleaning solution is used.<br/>Condition 4 &amp; 5 – Per written procedures, facility utilizes solvent-free cleaning solutions (water).<br/>Condition 6 – Visual observation of ROC containing materials in closed containers while in storage.<br/>Condition 7 – Facility resources are trained to dispose of waste per CA Title 22, and Federal RCRA waste management requirements.<br/>Condition 8 – Electronic and hardcopy records maintained for ink usage.<br/>Condition 9 – Test conducted utilizing specified methods upon District request.</p> | <p>F. Currently in Compliance?<br/><b>YES</b></p> <p>G. Compliance Status:<br/><b>INTERMITTENT</b></p> <p>H. *Excursions, Exceedence, or other non-compliance: <b>YES</b><br/><b>See Deviaiton Summary</b></p> |



Ventura County  
Air Pollution  
Control District

## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

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



**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

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|---|---|
| <p>A. Attachment # or Permit Condition #:<br/>Section 6 – Attachment STRMLN15LM6000-NOx-rev291</p>  | <p>D. Frequency of monitoring:<br/><b>Monthly</b></p>   |
| <p>B. Description: LM6000 Gas Turbine Based Cogeneration Unit</p> <p><u>Condition 1, 2, 4, &amp; 6</u> - NOx &lt; 2.5 ppmvd avg. @ 15% O2 over 3 hr. period, Annual Source Test, and CEMs, ROC &lt;2.0 ppmvd @ 15% O2 average over 3 consecutive hrs. Operate Oxidation Catalyst &amp; test annually, Outlet Ammonia &lt; 20 ppmvd verified annually via source test, PM &lt; 3.08 lbs/MMscf &amp; source test using ARB Method 5 upon District request</p> <p><u>Condition 3</u>: Emissions Exemption: 12 hr cold startup, 3 hr normal-startup, 2 hr unplanned load changes, and 1 hr shutdown</p> <p><u>Condition 5.a-f</u> - 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><u>Condition 7.a-l &amp; 8.a-c</u> - Operate and maintain CEMs &amp; record permit specified data, CEMs calibration and maintenance per 40 CFR, part 51, Appendix P, Sections 3.0 through 3.9.5</p> <p><u>Condition 9</u> - Written Notification of monitored emission standards violations within 96 hours</p> <p><u>Condition 10.a-d &amp; 11</u> - Permanent CEMs records, to include permit specified data, Upon request submit CEMs data to District</p> <p><u>Condition 12 &amp; 13</u> - CEMs data reduced per 40 CFR, part 51, appendix P, paragraphs 5.0 – 5.3.3. Records maintained per permit conditions</p> <p><u>Condition 14.a-b</u> - Turbine Operating hours report &amp; annual source test report</p> | <p>E. Source test reference method<br/><b>Source Test Summary Form 2 of 4</b></p> <p>EPA Method 20 -NOx<br/>ARB Method 100 -CO, O2<br/>EPA Method 18 -ROC<br/>ASTM Method D 3588-91 - Fuel HV<br/>BAAQMD Method ST-1B-NH3</p> |
| <p>C. Method of monitoring:<br/>Condition 1, 2, 4, 5, &amp; 6 – Annual source test conducted on March 31, 2016.<br/>Condition 2, 7, 10, 11, 13 – Recordkeeping.<br/>Condition 3 – Exemptions applied as required throughout the calendar year.<br/>Condition 5 – Utilize certified Source Test vendors, use specified test methods, and submit documentation per deadline requirements.<br/>Condition 8 - Maintenance via operators with assistance from CEM manufacturer.<br/>Condition 9 – Operational procedures ensure compliance with 96 hour reporting requirement.<br/>Condition 12 – Data Acquisition System data reduction and recordkeeping per specification.<br/>Condition 14 – Turbine report submitted semi-annually, source test submitted annually.</p>   | <p>F. Currently in Compliance?<br/><b>YES</b></p> <p><b>G. Compliance Status:</b><br/><b>INTERMITTENT</b></p> <p><b>H. *Excursions, Exceedence, or other non-compliance: YES</b></p> <p><b>See Deviation Summary</b></p>      |





**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

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|---|---|
| <p>A. Attachment # or Permit Condition #:<br/>Section 6 – Attachment STRMLN15LM2500-NOx,CO-rev 391</p>  | <p>D. Frequency of monitoring:<br/><b>Monthly</b></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 &lt; 24 ppmvd @ 15% O2 while burning Natural Gas</p> <p>Condition 2 – Emissions Exemption: 1 hr for startup &amp; shutdown</p> <p>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.</p> <p>Condition 4 – Operate and maintain CEMs &amp; record permit specified data.</p> <p>Condition 5 – CEMs calibration and maintenance per 40 CFR, part 51, Appendix P, Sections 3.0 through 3.9.5.</p> <p>Condition 6 – Written Notification of emissions violations within 96 hours.</p> <p>Condition 7 – Permanent CEMs records, to include permit specified data.</p> <p>Condition 8 – Upon request submit CEMs data to District.</p> <p>Condition 9 – CEMs data reduced per 40 CFR, part 51, appendix P, paragraphs 5.0 – 5.3.3.</p> <p>Condition 10 – Records maintained per permit conditions.</p> <p>Condition 11 – Turbine Operating hours report &amp; annual source test report.</p> | <p>E. Source test reference method<br/><b>See Source Test Summary Form 3 of 4</b></p> <p>EPA Method 20 -NOx<br/>ARB Method 100 -CO, O2<br/>ASTM Method D 3588-91 - Fuel HV</p>  |
| <p>C. Method of monitoring:</p> <p>Condition 1, 3 – Annual source performed on May 18, 2016</p> <p>Condition 1, 2, 4, 7, 8, 9, 10 – Recordkeeping</p> <p>Condition 5 – Maintenance via operators with assistance from CEMs manufacturer</p> <p>Condition 6 – Operational procedures ensure compliance with 96 hour reporting requirement</p> <p>Condition 11 – Turbine report submitted semi-annually, source test submitted annually</p>   | <p>F. Currently in Compliance?<br/><b>YES</b></p> <p><b>G. Compliance Status:</b></p> <p><b>INTERMITTENT</b></p> <p>H. *Excursions, Exceedence, or other non-compliance: <b>YES</b></p> <p><b>See Deviation Summary</b></p> |



Ventura County  
Air Pollution  
Control District

## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

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



Ventura County  
Air Pollution  
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## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

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| <p>A. Attachment # or Permit Condition #:<br/>Section 6 – Attachment NESHAP KK</p>   | <p>D. Frequency of monitoring:<br/><b>Monthly</b></p>  |
| <p>B. Description: 40 CFR Part 63 Subpart KK Applicable Requirements</p> <p>Condition 1 – Use &lt; 10 Ton per 12 month rolling period of each HAP</p> <p>Condition 2 – Use &lt; 25 tons total per 12 month rolling period for all HAPs</p> <p>Condition 3 – HAP exclusion for various activities</p> <p>Condition 4 – Considered Area Source if it complies with HAP limitations</p> <p>Condition 5 – Maintain monthly records and calculations of HAP materials and their HAP fractions</p> <p>Condition 6 – Provided 40 CFR 63.9(b) Notification</p> | <p>E. Source test reference method<br/><b>N/A</b></p>  |
| <p>C. Method of monitoring:<br/>Conditions 1 – 6: In 2016, 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.</p>   | <p>F. Currently in Compliance?<br/><b>YES</b></p> <p>G. Compliance Status:<br/><b>CONTINUOUS</b></p> <p>H. *Excursions, Exceedence, or other non-compliance:<br/><b>NO</b></p> |



Ventura County  
Air Pollution  
Control District

## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

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| <p>A. Attachment # or Permit Condition #:<br/>Section 6 – Attachment ATCM Engine N1</p>  | <p>D. Frequency of monitoring:<br/><b>Monthly</b></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<br/><b>N/A</b></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?<br/><b>YES</b></p> <p>G. Compliance Status:<br/><b>CONTINUOUS</b></p> <p>H. *Excursions, Exceedence, or other non-compliance:<br/><b>NO</b></p> |



Ventura County  
Air Pollution  
Control District

## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

|   |  |
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| <p>A. Attachment # or Permit Condition #:<br/>Section 6 - Attachment 40CFR63 ZZZZN3</p>   | <p>D. Frequency of monitoring:<br/><b>Monthly</b></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 &amp; 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<br/><b>N/A</b></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 &amp; 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 the ACC</p>   | <p>F. Currently in Compliance?<br/><b>YES</b></p> <p>G. Compliance Status:<br/><b>CONTINUOUS</b></p> <p>H. *Excursions, Exceedence, or other non-compliance:<br/><b>NO</b></p> |

# **Permit Section: 7**

Permit Specific Conditions (Attachments)



**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

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| <p><b>A. Attachment # or Permit Condition #:</b><br/>Section 7 – Attachment PO00015PC1-rev411, 431, 441</p>  | <p>D. Frequency of monitoring: <b>Monthly</b></p>  |
| <p><b>B. Description: Throughput &amp; Consumption Limits and Solvent Records</b></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 pounds used per rolling 12 month period.</p> <p>Condition 3 - Permission to operate a rental boiler that is &lt; 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<br/><b>N/A</b></p>  |
| <p><b>C. Method of monitoring:</b></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?<br/><b>YES</b></p> <p>G. Compliance Status:<br/><b>CONTINUOUS</b></p> <p>H. *Excursions, Exceedance, or other non-compliance:<br/><b>NO</b></p> |



**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

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| <p><b>A. Attachment # or Permit Condition #:</b><br/>Section 7 – Attachment PO00015PC2-rev 411, 431, 441</p>  | <p>D. Frequency of monitoring:<br/><b>Monthly</b></p>  |
| <p><b>B. Description: Combustion Emissions Units- LM6000, LM2500, B&amp;W Steam Boiler, 1X Hot Air, 1X Yankee Furnace, 2X Furnaces</b></p> <p>Condition 1 – Specifies monitoring requirements and calculations to demonstrate compliance with TPY emissions limits for Combustion Unit group identified in this condition.<br/>         Condition 2 – Restricts fuel used in specified combustion units to Natural Gas (NG)<br/>         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.<br/>         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.<br/>         Condition 5 - The Table 4 CO hourly lb./hour for the LM600 shall be demonstrated by the annual source test requirement in STRMLIN15LM6000-NOx.<br/>         Condition 6 - Permission to operate a rental boiler that is &lt; 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<br/><b>N/A</b></p>  |
| <p><b>C. Method of monitoring:</b></p> <p>Condition 1 – Monthly monitoring of emissions records to ensure compliance with combustion emission limits.<br/>         Condition 2 – Facility exclusively utilized PUC Natural Gas to fire all permitted combustion units at facility.<br/>         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.<br/>         Condition 4 &amp; 5 - Source Test records demonstrating the Table 4 limits for each turbine was performed and submitted per the STRMLN Requirements for each turbine.<br/>         Condition 6 - Alternative Operating Scenario was not utilized in RY2016</p>  | <p>F. Currently in Compliance?<br/><b>YES</b></p> <p>G. Compliance Status:<br/><b>CONTINUOUS</b></p> <p>H. *Excursions, Exceedance, or other non-compliance:<br/><b>NO</b></p> |





**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

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| <p><b>A. Attachment # or Permit Condition #:</b><br/><br/>Section 7 – Attachment PO00015PC3-rev351</p>   | <p><b>D. Frequency of monitoring:</b><br/>Condition 2 - Semi Annual<br/>Condition 3 - Permit Term<br/>Condition 4 - Bi Annual</p>   |
| <p><b>B. Description: 2X Papermachine Hot Air Furnace and “Yankee” Hood Furnace Requirements</b><br/>Condition 1 –Emission limitations: NOx &lt; 0.08 lb./MMBTU, CO &lt; 0.045 lb./MMBTU<br/><br/>Condition 2 –Fuel and air settings locked in position as specified in permit. Settings recorded every 6 months<br/><br/>Condition 3 – Source test the Hot Air before March 31, 2018 using ARB Method 100 for NOx, CO and O2. Notification &amp; Test Protocol to District 15 days in advance. Report within 45 after test.<br/><br/>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 &amp; Test Protocol to District 15 days in advance. Report within 45 after test.</p> | <p><b>E. Source test reference method:</b><br/><b>ARB Method 100:</b><br/><b>NOx</b><br/><b>CO</b><br/><b>Stack Gas O2</b><br/><b>See Source Test Form 4 of 4</b></p>   |
| <p><b>C. Method of monitoring:</b><br/>Condition 1 - Both Furnaces demonstrated compliance to the NOx and CO limits per their last Source Test<br/><br/>Condition 2 – Fuel Linkage settings for the Yankee and Hot Air Furnaces were monitored in January and July to meet requirement<br/><br/>Condition 3 - Condition requirements were met as demonstrated in the most recently submitted Source Test Report.<br/><br/>Condition 4 - Condition requirements were met as demonstrated in the most recently submitted Source Test Report.</p>   | <p><b>F. Currently in Compliance?</b><br/><b>YES*</b></p> <p><b>G. Compliance Status:</b><br/><b>INTERMITTENT**</b></p> <p><b>H. *Excursions, exceedances, or other non-compliance:</b><br/><br/>Possible exception to continuous compliance***</p> |

\* Under normal Hot Air Furnace operating load condition with Cogen II hot air to 2X.

\*\* We do not have a continuous monitoring method. The 2X Hot Air Furnace’s normal operating load is zero (>95% of the Paper Machine Operating Time).

\*\*\* We have engineering data from testing done relative to the retrofit rule, that was not conducted under normal operating conditions specified for stack testing, that indicate elevated CO emission rates for the Hot Air Furnace.



**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

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| <b>A. Attachment # or Permit Condition #:</b><br>Section 7 – Attachment PO00015PC4 –rev 411, 431, 441   | <b>D. Frequency of monitoring:</b><br><b>Monthly</b>  |
| <b>B. Description: Flue Gas Recirculation (FGR) Requirements for Babcock &amp; Wilcox Steam Boiler</b><br><br>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. | <b>E. Source test reference method</b><br><b>N/A</b>  |
| <b>C. Method of monitoring:</b><br>Parameters to be monitored, measured, and recorded on monthly basis.   | <b>F. Currently in Compliance?</b><br><b>YES</b><br><b>G. Compliance Status:</b><br><b>CONTINUOUS</b><br><b>H. *Excursions, Exceedance, or other non-compliance:</b><br><b>NO</b> |



**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

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| <p><b>A. Attachment # or Permit Condition #:</b><br/>Section 7 – Attachment PO00015PCS-rev 441</p>  | <p>D. Frequency of monitoring:<br/><b>Monthly</b></p>  |
| <p><b>B. Description: Particulate Matter Emission Requirements 1X Paper Machine, 2X Paper Machine, Wet Lapper and Converting Line Rooms</b><br/>Condition 1: Emission Limitations: 1X PM &lt; 6.75 lbs/hr., 2X PM &lt; 3.99 lbs/hr., Wet Lapper &lt; 0.10<br/>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.<br/>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.<br/>Condition 4.a-b: PM emissions must meet limitations specified in Rules 52 and 53 (table limits in each rule)<br/>Condition 5: Compliance with Rule 52 &amp; 53 achieved with compliance with Condition 1 and 2<br/>Condition 6: Converting room emissions shall be re-circulated back into room</p> | <p>E. Source test reference method<br/><b>N/A</b></p>  |
| <p><b>C. Method of monitoring:</b><br/>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.<br/>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.<br/>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?<br/><b>YES</b></p> <p>G. Compliance Status:<br/><b>CONTINUOUS</b></p> <p>H. *Excursions, Exceedance, or other non-compliance:<br/><b>NO</b></p> |



**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

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



**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

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



### ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

**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, Exceedance, 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, 2016 - December 31, 2016**

|   |  |
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| <p><b>A. Attachment # or Permit Condition #:</b><br/>Section 8 – Attachment Rule 50 (04/13/04)</p>  | <p>D. Frequency of monitoring:<br/><b>Monthly</b></p>  |
| <p><b>B. Description: Opacity</b><br/><br/>Condition 1 – 3 Minute emissions in hour less than 20% Opacity<br/><br/>Condition 2 – Routine Surveillance and record of visible emissions other than uncombined water<br/><br/>Condition 3 – Annual compliance certification, including site survey<br/><br/>Condition 4 – EPA Method 9 survey per District request</p> | <p>E. Source test reference method:<br/><b>N/A</b></p>   |
| <p><b>C. Method of monitoring:</b><br/>Condition 1 &amp; 2 – No visible emissions were observed in 2016<br/><br/>Condition 3 - Opacity Survey completed on June24th, 2016<br/><br/>Condition 4 - Perform EPA Method 9 survey upon District request</p>  | <p>F. Currently in Compliance?<br/><b>YES</b></p> <p>G. Compliance Status:<br/><b>CONTINUOUS</b></p> <p>H. *Excursions, Exceedence, or other non-compliance:<br/><b>NO</b></p> |





**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

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|---|---|
| <p><b>A. Attachment # or Permit Condition #:</b><br/>Section 8 – Attachment 54.B.1 (01/14/14)</p>   | <p><b>D. Frequency of monitoring:</b><br/><b>Monthly</b></p>  |
| <p><b>B. Description: Sulfur Compounds – Sulfur Emissions from Combustion Operations at Point of Discharge</b></p> <p>Condition 1 – Point of Discharge SO<sub>2</sub> concentrations &lt; 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 SO<sub>2</sub></p> | <p><b>E. Source test reference method:</b><br/><b>N/A</b></p>   |
| <p><b>C. Method of monitoring:</b></p> <p>Condition 1 – Compliance with permit condition Attachment P00015PC2. Only PUC-quality natural gas and CARB approved diesel used on site in 2016</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><b>F. Currently in Compliance?</b><br/><b>YES</b></p> <p><b>G. Compliance Status:</b><br/><b>CONTINUOUS</b></p> <p><b>H. *Excursions, Exceedence, or other non-compliance:</b><br/><b>NO</b></p> |



**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

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| <p><b>A. Attachment # or Permit Condition #:</b><br/>Section 8 - Attachment 54.B.2 (01/14/14)</p>  | <p><b>D. Frequency of monitoring:</b><br/><b>Monthly</b></p>  |
| <p><b>B. Description: Sulfur compounds – SO2 Concentrations</b></p> <p>Condition 1 – Property Line SO2 concentrations: 1 hr. &lt; 0.25 ppmvd, 24 hr. &lt; 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><b>E. Source test reference method:</b><br/><b>N/A</b></p>   |
| <p><b>C. Method of monitoring:</b></p> <p>Condition 1 - Compliance with permit condition Attachment P00015PC2. Only PUC-quality natural gas, and CARB approved diesel used on site in 2016</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><b>F. Currently in Compliance?</b><br/><b>YES</b></p> <p><b>G. Compliance Status:</b><br/><b>CONTINUOUS</b></p> <p><b>H. *Excursions, Exceedence, or other non-compliance:</b><br/><b>NO</b></p> |



**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

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| <p><b>A. Attachment # or Permit Condition #:</b><br/>Section 8 – Attachment 55 (06/10/08)</p>  | <p>D. Frequency of monitoring:<br/><b>Monthly</b></p>  |
| <p><b>B. Description: Fugitive Dust</b></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 <math>\geq 25</math>ft 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:<br/><b>N/A</b></p>   |
| <p><b>C. Method of monitoring:</b></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?<br/><b>YES</b></p> <p>G. Compliance Status:<br/><b>CONTINUOUS</b></p> <p>H. *Excursions, Exceedence, or other non-compliance:<br/><b>NO</b></p> |



**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

|   |  |
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| <p><b>A. Attachment # or Permit Condition #:</b><br/>Section 8 – Attachment 57.1 (01/11/05)</p>   | <p>D. Frequency of monitoring:<br/><b>Monthly</b></p>  |
| <p><b>B. Description: Particulate Matter Emissions from Fuel Burning Equipment</b></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:<br/><b>N/A</b></p>   |
| <p><b>C. Method of monitoring:</b></p> <p>Condition 1 – Satisfy Conditions 2 &amp; 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?<br/><b>YES</b></p> <p>G. Compliance Status:<br/><b>CONTINUOUS</b></p> <p>H. *Excursions, Exceedence, or other non-compliance:<br/><b>NO</b></p> |



### ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

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



**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

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| <p><b>A. Attachment # or Permit Condition #:</b><br/>Section 8 – Attachment 64.B.2 (04/13/99)</p>  | <p>D. Frequency of monitoring:<br/><b>Monthly</b></p>  |
| <p><b>B. Description: Sulfur Content of Fuels – Liquid Fuel Requirements</b></p> <p>Condition 1 – No liquid Fuel usage with sulfur content &gt; 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:<br/><b>N/A</b></p>   |
| <p><b>C. Method of monitoring:</b></p> <p>Conditions 1 &amp; 2 – Maintain records of exclusive use of ARB compliant liquid fuel used on site in 2016 – 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?<br/><b>YES</b></p> <p>G. Compliance Status:<br/><b>CONTINUOUS</b></p> <p>H. *Excursions, Exceedence, or other non-compliance:<br/><b>NO</b></p> |



**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

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| <p><b>A. Attachment # or Permit Condition #:</b><br/>Section 8 – Attachment 74.6 (11/11/03)</p>   | <p>D. Frequency of monitoring:<br/><b>Monthly</b></p>  |
| <p><b>B. Description: Surface Cleaning and Degreasing</b></p> <p><u>Condition 1.a-c:</u> 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 &lt; 900 g/l ROC &amp; &lt; 33 mmHg partial pressure. Cleaning solvents used for other purposes shall not exceed 25 g/l as applied.</p> <p><u>Condition 2.a-d:</u> If use solvents &gt; 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><u>Condition 3:</u> No liquid cleaning solvent leaks from equipment or containers.</p> <p><u>Condition 4:</u> No solvents shall be solicited, supplied, sold, or used that would violate Rule 74.6.</p> <p><u>Condition 5:</u> Use less than one gallon of halogenated solvents per week for cold cleaning. If use maintain records.</p> <p><u>Condition 6:</u> Solvent stored in non-absorbent containers and closed except for filling or emptying.</p> <p><u>Condition 7:</u> Dispose of solvents and solvent residues as specified in California Hazardous Waste Code.</p> <p><u>Condition 8.a-f:</u> Cold Cleaning equipment requirements, except for remote reservoir cold cleaners.</p> <p><u>Condition 9.a-e:</u> Remote Reservoir cold cleaner equipment requirements.</p> <p><u>Condition 10.a-g:</u> Cold Cleaner operating requirements.</p> <p><u>Condition 11.a-h:</u> Rule 74.6 exemptions</p> <p><u>Condition 12.a-o:</u> Condition 1 exemptions</p> <p><u>Condition 13:</u> Condition 1 and 2 exemptions</p> <p><u>Condition 14.a-d:</u> Solvent Material recordkeeping requirements. Upon district request, make information available to district personnel</p> <p><u>Condition 15:</u> Maintain records and perform routine surveillance of solvent cleaning activities</p> | <p>E. Source test reference method:<br/><b>N/A</b></p>   |
| <p><b>C. Method of monitoring:</b></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 Surface Cleaning and Degreasing List</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?<br/><b>YES</b></p> <p>G. Compliance Status:<br/><b>CONTINUOUS</b></p> <p>H. *Excursions, Exceedence, or other non-compliance:<br/><b>NO</b></p> |



**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

|  |  |
|--|--|
| <p>A. Attachment # or Permit Condition #:<br/>Section 8 – Attachment 74.11.1 (9/11/12)</p>   | <p>D. Frequency of monitoring:<br/><b>Monthly</b></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 <math>\geq 75</math> MBTU/hr and <math>\leq 400</math> 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 <math>\geq 400</math> MBTU/hr and <math>&lt; 1,000</math> 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:<br/><b>N/A</b></p>   |
| <p>C. Method of monitoring:<br/>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?<br/><b>YES</b></p> <p>G. Compliance Status:<br/><b>CONTINUOUS</b></p> <p>H. *Excursions, Exceedence, or other non-compliance:<br/><b>NO</b></p> |





**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

|  |   |
|--|---|
| <b>A. Attachment # or Permit Condition #:</b><br>Section 8 – Attachment 74.22  | <b>D. Frequency of monitoring:</b><br><b>Monthly</b>  |
| <b>B. Description: Natural Gas-Fired Fan-Type Central Furnaces</b><br><br>Condition 1.a-b: New fan type central furnaces require NOx < 40ng per Joule Output<br><br>Condition 2: Maintain list of fan types with permit specified data<br><br>Condition 3: Annual survey of fan furnaces | <b>E. Source test reference method:</b><br><b>N/A</b>   |
| <b>C. Method of monitoring:</b><br>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.  | <b>F. Currently in Compliance?</b><br><b>YES</b><br><b>G. Compliance Status:</b><br><b>CONTINUOUS</b><br><b>H. *Excursions, Exceedence, or other non-compliance:</b><br><b>NO</b> |

# **Permit Section: 9-11**

General Requirements for Short-Term Activities (Attachments)

General Permit Conditions

Miscellaneous Federal Program Conditions



**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

|  |  |
|--|--|
| <p><b>A. Attachment # or Permit Condition #:</b><br/>Section 9 – Attachment 74.1</p>   | <p>D. Frequency of monitoring:<br/><b>Monthly</b></p>  |
| <p><b>B. Description: Abrasive Blasting</b></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:<br/><b>N/A</b></p>   |
| <p><b>C. Method of monitoring:</b></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 2016</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?<br/><b>YES</b></p> <p>G. Compliance Status:<br/><b>CONTINUOUS</b></p> <p>H. *Excursions, Exceedence, or other non-compliance:<br/><b>YES</b></p> <p>See Deviation Summary</p> |



**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

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| <p><b>A. Attachment # or Permit Condition #:</b><br/>Section 9 – Attachment 74.2 (01/12/10)</p>  | <p>D. Frequency of monitoring:<br/><b>Monthly</b></p>  |
| <p><b>B. Description: Architectural Coatings</b></p> <p>Condition 1.a-c: VOC Coating content limits, less water and exempt OC's, Flat &lt;100 g/l; Nonflat &lt;150 g/l; Nonflat High Gloss &lt;250 g/l</p> <p>Condition 2 – Specialty coatings shall conform with Rule 74.2 Table of Standards. Industrial Maintenance &lt;250 g/l less water &amp; 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<br/><b>N/A</b></p>  |
| <p><b>C. Method of monitoring:</b></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 – The facility prohibit the thinning of paints and coatings if thinning can cause the paint or coating to exceed it's specified limit.</p> <p>Condition 5 – Visual observations occur routinely. VOC data maintained for each coating via vendor supplied SDS. 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?<br/><b>YES</b></p> <p>G. Compliance Status:<br/><b>CONTINUOUS</b></p> <p>H. *Excursions, Exceedence, or other non-compliance:<br/><b>NO</b></p> |



**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

**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 2016

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, 2016 - December 31, 2016**

|   |  |
|---|--|
| <p><b>A. Attachment # or Permit Condition #:</b><br/>Section 9 - Attachment 40 CFR 61.M</p>   | <p>D. Frequency of monitoring:<br/><b>Monthly</b></p>  |
| <p><b>B. Description: National Emissions Standards for Asbestos</b></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<br/><b>N/A</b></p>  |
| <p><b>C. Method of monitoring:</b></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 2016.</p> | <p>F. Currently in Compliance?<br/><b>YES</b></p> <p>G. Compliance Status:<br/><b>CONTINUOUS</b></p> <p>H. *Excursions, Exceedence, or other non-compliance:<br/><b>NO</b></p> |



**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

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



**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

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

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

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





**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

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

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

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



**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

|   |  |
|---|--|
| <p><b>A. Attachment # or Permit Condition #:</b><br/>Section 10 – Attachment PO General</p>   | <p>D. Frequency of monitoring: <b>Monthly</b></p>  |
| <p><b>B. Description: General Permit to Operate Conditions</b></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<br/><b>N/A</b></p>  |
| <p><b>C. Method of monitoring:</b></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? <b>YES</b></p> <p>G. Compliance Status:<br/><b>CONTINUOUS</b></p> <p>H. *Excursions, Exceedence, or other non-compliance: <b>NO</b></p> |



### ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

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



### ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2016 - December 31, 2016**

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

# Source Tests



Ventura County Air  
Pollution Control  
District

## ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

**Period Covered by Compliance Certification: January 1, 2016- December 31, 2016**

|   |  |  |                                  |
|---|--|--|----------------------------------|
| A. Emission Unit Description:<br><b>B-301 Boiler</b>  |  |  | B. Pollutant<br><b>NOx</b>       |
| C. Measured Emission Rate:<br><b>31.80 ppm @3% O2</b> | D. Limited Emission Rate:<br><b>40 ppm @ 3% O2</b> | E. Specific Source Test:<br><b>P27-068-FR B301</b> | F. Test Date<br><b>3/30/2016</b> |

|  |   |  |                                  |
|--|---|--|----------------------------------|
| A. Emission Unit Description:<br><b>B-301 Boiler</b>   |   |  | B. Pollutant<br><b>CO</b>        |
| C. Measured Emission Rate:<br><b>17.10 ppm @ 3% O2</b> | D. Limited Emission Rate:<br><b>400 ppm @ 3% O2</b> | E. Specific Source Test:<br><b>P27-068-FR B301</b> | F. Test Date<br><b>3/30/2016</b> |



## ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

**Period Covered by Compliance Certification: January 1, 2016- December 31, 2016**

|  |  |   |                                  |
|--|--|---|----------------------------------|
| A. Emission Unit Description:<br><b>LM6000 Turbine</b> |  |   | B. Pollutant<br><b>NOx</b>       |
| C. Measured Emission Rate:<br><b>2.51 ppm @ 15% O2</b> | D. Limited Emission Rate:<br><b>2.5 ppm @ 15% O2</b> | E. Specific Source Test:<br><b>P27-068-FRCOMP</b> | F. Test Date<br><b>3/31/2016</b> |

|  |   |   |                                  |
|--|---|---|----------------------------------|
| A. Emission Unit Description:<br><b>LM6000 Turbine</b> |   |   | B. Pollutant<br><b>CO</b>        |
| C. Measured Emission Rate:<br><b>5.99 lb/hour</b>      | D. Limited Emission Rate:<br><b>10.20 lb/hour</b> | E. Specific Source Test:<br><b>P27-068-FRCOMP</b> | F. Test Date<br><b>3/31/2016</b> |

|  |   |   |                                  |
|--|---|---|----------------------------------|
| A. Emission Unit Description:<br><b>LM6000 Turbine</b> |   |   | B. Pollutant<br><b>O2</b>        |
| C. Measured Emission Rate:<br><b>15.12 %</b>           | D. Limited Emission Rate:<br><b>N/A</b> | E. Specific Source Test:<br><b>P27-068-FRCOMP</b> | F. Test Date<br><b>3/31/2016</b> |

|  |   |   |                                  |
|--|---|---|----------------------------------|
| A. Emission Unit Description:<br><b>LM6000 Turbine</b> |   |   | B. Pollutant<br><b>Heat Rate</b> |
| C. Measured Emission Rate:<br><b>438.00 MMbtu/hour</b> | D. Limited Emission Rate:<br><b>N/A</b> | E. Specific Source Test:<br><b>P27-068-FRCOMP</b> | F. Test Date<br><b>3/31/2016</b> |

|  |   |   |                                  |
|--|---|---|----------------------------------|
| A. Emission Unit Description:<br><b>LM6000 Turbine</b> |   |   | B. Pollutant<br><b>NH3</b>       |
| C. Measured Emission Rate:<br><b>1.00 ppm @ 15% O2</b> | D. Limited Emission Rate:<br><b>20 ppm @ 15% O2</b> | E. Specific Source Test:<br><b>P27-068-FRCOMP</b> | F. Test Date<br><b>3/31/2016</b> |

|  |   |   |                                  |
|--|---|---|----------------------------------|
| A. Emission Unit Description:<br><b>LM6000 Turbine</b>     |   |   | B. Pollutant<br><b>ROC</b>       |
| C. Measured Emission Rate:<br><b>&lt; 0.36 ppm @ 3% O2</b> | D. Limited Emission Rate:<br><b>2.0 ppm @ 3% O2</b> | E. Specific Source Test:<br><b>P27-068-FRCOMP</b> | F. Test Date<br><b>3/31/2016</b> |



Ventura County Air  
Pollution Control  
District

## ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

**Period Covered by Compliance Certification: January 1, 2016- December 31, 2016**

|   |   |  |                                  |
|---|---|--|----------------------------------|
| A. Emission Unit Description:<br><b>LM2500 Turbine</b>  |   |  | B. Pollutant<br><b>NOx</b>       |
| C. Measured Emission Rate:<br><b>20.90 ppm @ 15% O2</b> | D. Limited Emission Rate:<br><b>24 ppm @ 15% O2</b> | E. Specific Source Test:<br><b>P27-070-FR COMP</b> | F. Test Date<br><b>5/18/2016</b> |

|   |  |  |                                  |
|---|--|--|----------------------------------|
| A. Emission Unit Description:<br><b>LM2500Turbine</b> |  |  | B. Pollutant<br><b>CO</b>        |
| C. Measured Emission Rate:<br><b>25.80 lb/hour</b>    | D. Limited Emission Rate:<br><b>180.13 lb/hour</b> | E. Specific Source Test:<br><b>P27-070-FR COMP</b> | F. Test Date<br><b>5/18/2016</b> |

|  |   |  |                                  |
|--|---|--|----------------------------------|
| A. Emission Unit Description:<br><b>LM2500 Turbine</b> |   |  | B. Pollutant<br><b>O2</b>        |
| C. Measured Emission Rate:<br><b>14.31 %</b>           | D. Limited Emission Rate:<br><b>N/A</b> | E. Specific Source Test:<br><b>P27-070-FR COMP</b> | F. Test Date<br><b>5/18/2016</b> |

|  |   |  |                                  |
|--|---|--|----------------------------------|
| A. Emission Unit Description:<br><b>LM2500 Turbine</b> |   |  | B. Pollutant<br><b>Heat Rate</b> |
| C. Measured Emission Rate:<br><b>234.00 MMbtu/hour</b> | D. Limited Emission Rate:<br><b>N/A</b> | E. Specific Source Test:<br><b>P27-070-FR COMP</b> | F. Test Date<br><b>5/18/2016</b> |





## ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

**Period Covered by Compliance Certification: January 1, 2016- December 31, 2016**

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

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

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

|   |  |   |                                  |
|---|--|---|----------------------------------|
| A. Emission Unit Description:<br><b>2X Yankee Hot Air Furnace (40 Mmbtu/hour)</b> |  |   | B. Pollutant<br><b>NOx</b>       |
| C. Measured Emission Rate:<br><b>-0.0082 lb/Mmbtu</b>                             | D. Limited Emission Rate:<br><b>0.080 lb/Mmbtu</b> | E. Specific Source Test:<br><b>P27-071-FR</b> | F. Test Date<br><b>9/15/2016</b> |

|   |  |   |                                  |
|---|--|---|----------------------------------|
| A. Emission Unit Description:<br><b>2X Yankee Hot Air Furnace (40 Mmbtu/hour)</b> |  |   | B. Pollutant<br><b>CO</b>        |
| C. Measured Emission Rate:<br><b>-0.035 lb/Mmbtu</b>                              | D. Limited Emission Rate:<br><b>0.045 lb/Mmbtu</b> | E. Specific Source Test:<br><b>P27-071-FR</b> | F. Test Date<br><b>9/15/2016</b> |

|   |   |   |                                  |
|---|---|---|----------------------------------|
| A. Emission Unit Description:<br><b>2X Yankee Hot Air Furnace (40 Mmbtu/hour)</b> |   |   | B. Pollutant<br><b>O2</b>        |
| C. Measured Emission Rate:<br><b>16.50 %</b>                                      | D. Limited Emission Rate:<br><b>N/A</b> | E. Specific Source Test:<br><b>P27-071-FR</b> | F. Test Date<br><b>9/15/2016</b> |

# Deviations



## DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 01/01/2016 to 12/31/2016

|  |  |  |
|--|--|--|
| <b>A. Attachment # or Permit Condition #:</b><br><br>STRMLN15LM6000-NOx-rev 291,<br>Condition 10c  | <b>B. Equipment description:</b><br><br>NOx Monitor – Teledyne, Model 200<br>EM  | <b>Deviation Period:</b><br>Date: 01/19/2016<br>Time Begin: 14:24<br>Time End: 15:27<br><br><b>When Discovered:</b><br>Date: 01/19/16<br>Time: 14:24 |
| <b>D. Parameters monitored:</b><br>Emission measurements for the exhaust<br>concentration of NOx   | <b>E. Limit:</b><br>Continuous   | <b>F. Actual:</b><br>2 hours missing /erroneous data due<br>to malfunction of CEMS monitor   |
| <b>G. Probable Cause of Deviation</b><br>Failure of the NOx Analyzer’s<br>condensate removal pump caused the<br>CEMS monitor to record inaccurate data | <b>H. Corrective actions taken:</b> <ol style="list-style-type: none"> <li>1. Confirmed turbine was in control and not emitting excess emissions during malfunction</li> <li>2. Shutdown Turbine Unit</li> <li>3. Replaced the vacuum pump and moisture filters</li> </ol> <p style="margin-top: 10px;">This deviation was previously reported 1-19-2016 and in written breakdown report submitted 1-22-2016. This was also reported in the JFM CEM Quarterly Report</p> |  |

|  |  |   |
|--|--|---|
| <b>A. Attachment # or Permit Condition #:</b><br><br>STRMLN15LM2500-NOx, CO-rev 391,<br>Condition 1  | <b>B. Equipment description:</b><br><br>22.7 MW GE Natural Gas<br>Cogeneration Turbine LM-2500   | <b>C. Deviation Period:</b><br>Date: 3/15/2016<br>Time Begin: 08:39<br>Time End: 08:59<br><br><b>When Discovered:</b><br>Date: 3/15/2016<br>Time: 08:39 |
| <b>D. Parameters monitored:</b><br>Exhaust concentration of NOx  | <b>E. Limit:</b><br>24 ppmvd@15% O2  | <b>F. Actual:</b><br>> 24 ppmvd @ 15% O2  |
| <b>G. Probable Cause of Deviation:</b><br>Malfunction in the control system for<br>the water generation process used to<br>control NOx emissions | <b>H. Corrective actions taken:</b> <ol style="list-style-type: none"> <li>1. Corrected problems that resulted in water generation system malfunction</li> <li>2. Implemented improved logic and controls to alert Operators of problems with upstream NOx water supply</li> </ol> <p style="margin-top: 10px;">This deviation was previously reported 3-15-2016 and in written breakdown report submitted 3-21-2016. This was also reported in the JFM CEM Quarterly Report</p> |   |



### DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 01/01/2016 to 12/31/2016

|  |   |  |
|--|---|--|
| <b>A. Attachment # or Permit Condition #:</b><br><br>STRMLN15LM6000-NOx-rev 291,<br>Condition 8  | <b>B. Equipment description:</b><br><br>Continuous Emissions Monitoring<br>Systems  | <b>C. Deviation Period:</b><br>Date: 04/01/2016<br>Time Begin: 00:00<br>Time End: 04/13/16 15:33<br><b>When Discovered:</b><br>Date: 03/31/2016<br>Time: 14:00 |
| <b>D. Parameters monitored:</b><br>Performance Specifications for CEMS<br>Systems  | <b>E. Limit:</b><br>Perform annual RATA   | <b>F. Actual:</b><br>Annual deadline + 13 days   |
| <b>G. Probable Cause of Deviation</b><br>During our 3-31-2016 Stack Testing but<br>prior to completion of our RATA, the<br>Cogen Unit received a critical fault and<br>had to be shut down before the RATA<br>test was completed | <b>H. Corrective actions taken:</b> <ol style="list-style-type: none"> <li>1. Obtained concurrence to retest on or before 4-15-2016</li> <li>2. Completed successful RATA testing on 4-13-2016</li> </ol> |  |

|  |  |   |
|--|--|---|
| <b>A. Attachment # or Permit Condition #:</b><br><br>PO00015PC2, Condition 5 | <b>B. Equipment description:</b><br><br>49.9 MW GE Natural Gas<br>Cogeneration Turbine LM-6000   | <b>C. Deviation Period:</b><br>Date: 10/29/2016<br>Time Begin: 10/29/2016 06:46<br>Time End: 11/02/2016 09:00<br><b>When Discovered:</b><br>Date: 11/02/2016<br>Time: 10:00 |
| <b>D. Parameters monitored:</b><br>CO ppm                                    | <b>E. Limit:</b><br>10.20 lbs/hour CO  | <b>F. Actual:</b><br>> 10.20 lbs/hour   |
| <b>G. Probable Cause of Deviation</b><br>DCS logic error                     | <b>H. Corrective actions taken:</b> <ol style="list-style-type: none"> <li>1. SDCS logic error repaired.</li> </ol> This deviation was previously reported 11-02-2016 and in a written breakdown<br>report submitted 11-07-2016. |   |



## DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 01/01/2016 to 12/31/2016

|  |  |  |
|--|--|--|
| <b>A. Attachment # or Permit Condition #:</b><br><br>Part 70 General, Condition 14                                   | <b>B. Equipment description:</b><br><br>Source Test Protocols  | <b>C. Deviation Period:</b><br>Dates: 3/4/2016, 3/7/2016, 5/5/2016, 8/31/2016<br><br><b>When Discovered:</b><br>2/1/2017 |
| <b>D. Parameters monitored:</b><br>N/A   | <b>E. Limit:</b><br>All documents shall be certified by a responsible official   | <b>F. Actual:</b><br>Source test protocols were not signed by a responsible official                                     |
| <b>G. Probable Cause of Deviation</b><br>Inadequate internal procedure to ensure source test protocols are certified | <b>H. Corrective actions taken:</b><br>Revised internal procedure to have Responsible Official certify each source test protocol prior to their respective submission. |  |

|  |  |   |
|--|--|---|
| <b>A. Attachment # or Permit Condition #:</b><br><br>Attachment 74.15N1, Condition 2<br><br>STRMLN15LM6000, Condition 5<br><br>STRMLN15LM2500, Condition 3 | <b>B. Equipment description:</b><br><br>Source Test Reports  | <b>C. Deviation Period:</b><br>Dates: various<br><br><b>When Discovered:</b><br>2/1/2017  |
| <b>D. Parameters monitored:</b><br>N/A   | <b>E. Limit:</b><br>Source Test reports shall be submitted within 45 days after the source test                              | <b>F. Actual:</b><br>Reports for the B-301, LM6000, and LM2500 were submitted > 45 days after their respective source test date |
| <b>G. Probable Cause of Deviation</b><br>Inadequate internal procedures to ensure timely submission of source test reports                                 | <b>H. Corrective actions taken:</b><br>Leverage tracking device to ensure timely submittal of all future source test reports |   |



## DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 01/01/2016 to 12/31/2016

|   |   |   |
|---|---|---|
| <b>A. Attachment # or Permit Condition #:</b><br>74.19N, condition 6                    | <b>B. Equipment description:</b><br>Graphic Arts  | <b>C. Deviation Period:</b><br>Dates: various<br><br><b>When Discovered:</b><br>2/1/2017            |
| <b>D. Parameters monitored:</b><br>ROC containing materials stored in closed containers | <b>E. Limit:</b><br>N/A   | <b>F. Actual:</b><br>ROC containing materials used for cleanup were not stored in closed containers |
| <b>G. Probable Cause of Deviation</b><br>Inadequate Internal procedures                 | <b>H. Corrective actions taken:</b><br>Clarified internal procedure to ensure ROC containing materials are stored in closed containers and trained personnel on procedure |   |



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

February 15, 2017



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 2016

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, 2016 through December 31, 2016 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, x3103 or green.km@pg.com should you have any questions about this certification.

Respectfully,

Kathleen Green  
Interim Site Environmental Leader

Cc:

Mr. Lelon Frazier, Plant Manager; P&G  
Mr. Kim Lim, HS&E Leader; P&G  
Mr. Kyle Field, SEL; P&G  
Ms. Chris Cote, AQS; VCAPCD

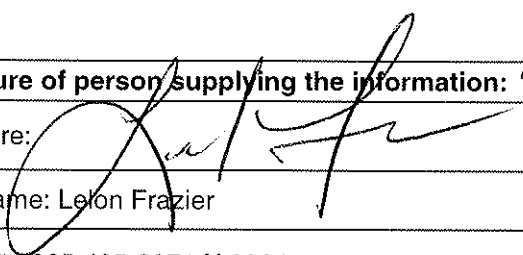
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2017 FEB 15 PM 2:5.  
A.P.C.D.

**EMERGENCY DIESEL ENGINE  
2016 ANNUAL REPORT FORM**

Reporting Period: January 1 through December 31, 2016

**Report Due Date: February 15, 2017**

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:  | <b>Procter &amp; Gamble Paper Products</b>   |                | <b>Permit No: 00015</b>  |                                     |
| Facility Address:   | <b>800 North Rice Avenue</b>   |                | Facility Contact: Kyle Field,<br>field.ka@pg.com                               |                                     |
| City:   | <b>Oxnard, CA 93030</b>  |                | Phone: 805-484-8871 X 2408   |                                     |
| 420 BHP   | <b>Caterpillar Diesel-Fired Emergency Standby Engine, Model 3406, Serial No 61808444, ID: Utility Yard Pump, PG-2, used for fire suppression</b> |                |  |                                     |
| Are the details listed above correct? If no, please make corrections.   |  |                | Yes  | <input checked="" type="checkbox"/> |
| <b>Reporting Requirements for Calendar 2015</b>   |  |                |  |                                     |
|   | Date of Reading  |                | Meter Reading  |                                     |
| First of 2016:  | <b>01/07/2016</b>  | First of 2016: | <b>688.00</b>  |                                     |
| End of 2016:  | <b>01/03/2017</b>  | End of 2016:   | <b>710.03</b>  |                                     |
| <b>Total annual hours for: Maintenance &amp; Testing:</b>   |  |                | <b>20.93</b>   |                                     |
| Hours of Emergency use:   |  |                | <b>1.1</b>   |                                     |
| <b>Total Hours of operation:</b>  |  |                | <b>22.03</b>   |                                     |
| Has the engine listed above exceeded the permit limit for maintenance and testing? <b>NO</b><br>If yes, please explain here or attach additional pages: |  |                |  |                                     |
| <b>Signature of person supplying the information: "I certify that the above information is correct."</b>  |  |                |  |                                     |
| Signature:  |   |                | Title: Plant Manager   |                                     |
| Print Name: Leron Frazier   |  |                | Date: <b>2/14/17</b>   |                                     |
| Phone #: 805 485-8871 X 8924  |  |                | Email: frazier.lf@pg.com   |                                     |
| Send report to: Ms. Chris Cote<br>Ventura County Air Pollution Control  |  |                | Chris: (805) 645-1442 <a href="mailto:chrisc@vcapcd.org">chrisc@vcapcd.org</a> |                                     |
| District  |  |                | Eric: (805) 645-1496 <a href="mailto:eric@vcapcd.org">eric@vcapcd.org</a>      |                                     |
| Floor   | 669 County Square Drive, Second<br>Ventura, CA 93003   |                | Fax: (805) 645-1444  |                                     |
|   |  |                | Form#: 00015-50  |                                     |

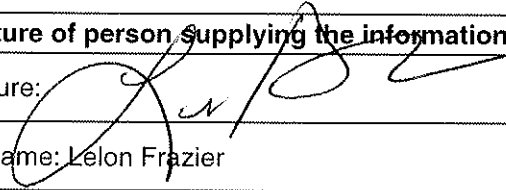


**EMERGENCY DIESEL ENGINE  
2016 ANNUAL REPORT FORM**

Reporting Period: January 1 through December 31, 2016

**Report Due Date: February 15, 2017**

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.

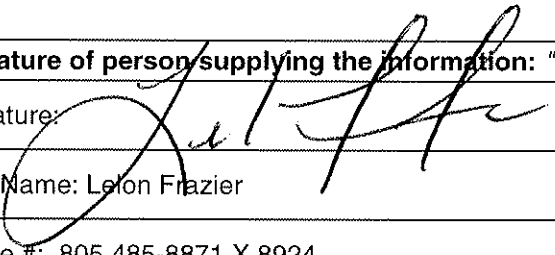
|   |  |  |                                     |
|---|--|--|-------------------------------------|
| Facility Name:  | <b>Procter &amp; Gamble Paper Products</b>   | <b>Permit No: 00015</b>  |                                     |
| Facility Address:   | <b>800 North Rice Avenue</b>   | Facility Contact: Kyle Field,<br>field.ka@pg.com                               |                                     |
| City:   | <b>Oxnard, CA 93030</b>  | Phone: 805-484-8871 X 2408   |                                     |
| 420 BHP   | <b>Caterpillar Diesel-Fired Emergency Standby Engine, Model 3406, Serial No 6TB10913, ID: Utility Yard Pump, PG-3, used for fire suppression</b> |  |                                     |
| Are the details listed above correct? If no, please make corrections.   |  |  |                                     |
|   |  | Yes  | <input checked="" type="checkbox"/> |
|   |  | No   | <input type="checkbox"/>            |
| <b>Reporting Requirements for Calendar 2015</b>   |  |  |                                     |
|   | Date of Reading  |  | Meter Reading                       |
| First of 2016:  | <b>01/07/2016</b>  | First of 2016:   | <b>740.0</b>                        |
| End of 2016:  | <b>01/03/2017</b>  | End of 2016:   | <b>765.3</b>                        |
| <b>Total annual hours for: Maintenance &amp; Testing:</b>   |  |  | <b>23.7</b>                         |
| <b>Hours of Emergency use:</b>  |  |  | <b>1.6</b>                          |
| <b>Total Hours of operation:</b>  |  |  | <b>25.3</b>                         |
| Has the engine listed above exceeded the permit limit for maintenance and testing? <b>NO</b><br>If yes, please explain here or attach additional pages: |  |  |                                     |
| <b>Signature of person supplying the information:</b> <i>"I certify that the above information is correct."</i>   |  |  |                                     |
| Signature:   |  | Title: Plant Manager   |                                     |
| Print Name: Lelon Frazier   |  | Date: <b>2/14/17</b>   |                                     |
| Phone #: 805 485-8871 X 8924  |  | Email: frazier.lf@pg.com   |                                     |
| Send report to: Ms. Chris Cote<br>Ventura County Air Pollution Control  |  | Chris: (805) 645-1442 <a href="mailto:chrisc@vcapcd.org">chrisc@vcapcd.org</a> |                                     |
| District<br>669 County Square Drive, Second   |  | Eric: (805) 645-1496 <a href="mailto:eric@vcapcd.org">eric@vcapcd.org</a>      |                                     |
| Floor<br>Ventura, CA 93003  |  | Fax: (805) 645-1444  |                                     |
|   |  | Form#: 00015-50  |                                     |

**EMERGENCY DIESEL ENGINE  
2016 ANNUAL REPORT FORM**

Reporting Period: January 1 through December 31, 2016

**Report Due Date: February 15, 2017**

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.

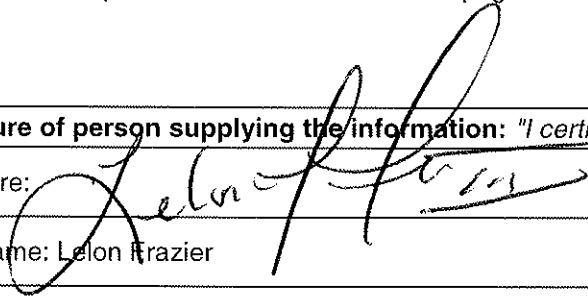
|   |   |                |  |  |                          |    |
|---|---|----------------|--|--|--------------------------|----|
| Facility Name:  | <b>Procter &amp; Gamble Paper Products</b>  |                |  | <b>Permit No: 00015</b>                          |                          |    |
| Facility Address:   | <b>800 North Rice Avenue</b>  |                |  | Facility Contact: Kyle Field,<br>field.ka@pg.com |                          |    |
| City:   | <b>Oxnard, CA 93030</b>   |                |  | Phone: 805-484-8871 X 2408                       |                          |    |
| 210 BHP   | <b>Clarke Detroit Diesel Allison, Inc. Diesel-Fired Emergency Engine, Model JU6HUF50 L1211H, Serial No. PE6068T157094, I.D: Warehouse Pump #2, (PG-5), used for fire suppression.</b> |                |  |  |                          |    |
| Are the details listed above correct? If no, please make corrections.   |   |                |  | Yes  | <input type="checkbox"/> | No |
|   |   |                |  | <input checked="" type="checkbox"/>              |                          |    |
| <b>Reporting Requirements for Calendar 2015</b>   |   |                |  |  |                          |    |
|   | Date of Reading   |                |  | Meter Reading                                    |                          |    |
| First of 2016:  | <b>01/07/2016</b>   | First of 2016: | <b>321.0</b>   |  |                          |    |
| End of 2016:  | <b>01/03/2017</b>   | End of 2016:   | <b>338.4</b>   |  |                          |    |
| <b>Total annual hours for: Maintenance &amp; Testing:</b>   |   |                |  | <b>17.4</b>                                      |                          |    |
| Hours of Emergency use:   |   |                |  | <b>0.0</b>                                       |                          |    |
| <b>Total Hours of operation:</b>  |   |                |  | <b>17.4</b>                                      |                          |    |
| Has the engine listed above exceeded the permit limit for maintenance and testing? <b>NO</b><br>If yes, please explain here or attach additional pages: |   |                |  |  |                          |    |
| <b>Signature of person supplying the information: "I certify that the above information is correct."</b>  |   |                |  |  |                          |    |
| Signature:   |   |                | Title: Plant Manager   |  |                          |    |
| Print Name: Lon Frazier   |   |                | Date: <b>2/14/17</b>   |  |                          |    |
| Phone #: 805 485-8871 X 8924  |   |                | Email: frazier.lf@pg.com   |  |                          |    |
| Send report to: Ms. Chris Cote<br>Ventura County Air Pollution Control  |   |                | Chris: (805) 645-1442 <a href="mailto:chrisc@vcapcd.org">chrisc@vcapcd.org</a> |  |                          |    |
| District<br>669 County Square Drive, Second   |   |                | Eric: (805) 645-1496 <a href="mailto:eric@vcapcd.org">eric@vcapcd.org</a>      |  |                          |    |
| Floor<br>Ventura, CA 93003  |   |                | Fax: (805) 645-1444  |  |                          |    |
|   |   |                | Form#: 00015-50  |  |                          |    |

**EMERGENCY DIESEL ENGINE  
2016 ANNUAL REPORT FORM**

Reporting Period: January 1 through December 31, 2016

**Report Due Date: February 15, 2017**

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:  | <b>Procter &amp; Gamble Paper Products</b>  | <b>Permit No: 00015</b>                          |  |
| Facility Address:   | <b>800 North Rice Avenue</b>  | Facility Contact: Kyle Field,<br>field.ka@pg.com |  |
| City:   | <b>Oxnard, CA 93030</b>   | Phone: 805-484-8871 X 2408                       |  |
| 210 BHP   | <b>Clarke Detroit Diesel Allison, Inc. Diesel-Fired Emergency Engine, Model JU6HUF50, Serial No. PE6068T185639, I.D: Warehouse Pump #1 (PG#4), used for fire suppression.</b> |  |  |
| Are the details listed above correct? If no, please make corrections.   |   | Yes  | <input checked="" type="checkbox"/> No |
| <b>Reporting Requirements for Calendar 2016</b>   |   |  |  |
|   | Date of Reading   |  | Meter Reading                          |
| First of 2016:  | <b>01/07/2016</b>   | First of 2016:                                   | <b>309.9</b>                           |
| End of 2016:  | <b>01/03/2017</b>   | End of 2016:                                     | <b>335.1</b>                           |
| <b>Total annual hours for: Maintenance &amp; Testing:</b>   |   |  | <b>25.2</b>                            |
| Hours of Emergency use:   |   |  | <b>0.0</b>                             |
| <b>Total Hours of operation:</b>  |   |  | <b>25.2</b>                            |
| Has the engine listed above exceeded the permit limit for maintenance and testing? <b>NO</b><br>If yes, please explain here or attach additional pages: |   |  |  |
| <b>Signature of person supplying the information: "I certify that the above information is correct."</b>  |   |  |  |
| Signature:  |    |  | Title: Plant Manager                   |
| Print Name: Lelon Frazier   |   |  | Date: <b>2/14/17</b>                   |
| Phone #: 805 485-8871 X 8924  | Email: frazier.lf@pg.com  |  |  |
| Send report to: Ms. Chris Cote<br>Ventura County Air Pollution Control  | Chris: (805) 645-1442 <a href="mailto:chrisc@vcapcd.org">chrisc@vcapcd.org</a>  |  |  |
| District  | Eric: (805) 645-1496 <a href="mailto:eric@vcapcd.org">eric@vcapcd.org</a>   |  |  |
| Floor   | Fax: (805) 645-1444   |  |  |
| 669 County Square Drive, Second<br>Ventura, CA 93003  | Form#: 00015-50   |  |  |

Opacity Annual Formal Survey  
Procter & Gamble Oxnard Plant

VCAPCD Part 70 Permit, Attachment 50 Compliance Document

Conducted On Date: 6/24/16 Time: 5:30 pm  
 Conducted By: Kathleen Green Signature: [Signature]

Visible Emissions Certification # 19390  
 Most Recent Certification Date W/A

Permit Emission Points  
Drawing - PG-3419820

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

Any Other Visible Emissions? NO

Atmospheric Conditions: 72°/clear/wind 7-10mph SSW/0% precip.  
(WFO Lox weather station)

| Fuel Usage (MMSCF)    | B301         |
|-----------------------|--------------|
| Jan-16                | 0.67         |
| Feb-16                | 4.63         |
| Mar-16                | 44.22        |
| Apr-16                | 0.90         |
| May-16                | 1.59         |
| Jun-16                | 0.01         |
| Jul-16                | 0.00         |
| Aug-16                | 0.01         |
| Sep-16                | 0.01         |
| Oct-16                | 9.84         |
| Nov-16                | 0.01         |
| Dec-16                | 7.79         |
| <b>12 Month Total</b> | <b>69.68</b> |

**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 = 69.6828 \* 1050

AHI = 73,167 MMBTU

**Maximum Potential Heat Input (MPHI)**

Rated Firing Capacity (RFC): 100 MMBTU/hr

Maximum Potential Operating Hours (MPOH): 8784 hrs

$MPHI = RFC * MPOH$

MPHI = 878,400 MMBTU

30% of MPHI (Maximum Allowable): 263520 MMBTU

Maximum Allowable Rolling 12 month Fuel Usage: 250.97 MMSCF

**Capacity Factor (CF)**

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

$CF = AHI / MPHI$

CF = 0.0832957 Ratio

% CF = 8.3% (%CF)

**PO00015PC1.1 RY 2016 Monthly Throughput**

| Month                      | PMKG         | CVTG        | Combustion   | Facility Wide Total Emissions                     |               |              |             |               |              |
|----------------------------|--------------|-------------|--------------|---|---------------|--------------|-------------|---------------|--------------|
|                            | ROC          | ROC         | ROC          | ROC   | NOx           | PM           | SOx         | CO            | NH3          |
|                            | (tons)       | (tons)      | (tons)       | (tons)  | (tons)        | (tons)       | (tons)      | (tons)        | (tons)       |
| Jan-16                     | 2.43         | 0.19        | 1.17         | 3.80  | 8.01          | 1.42         | 0.16        | 10.35         | 0.75         |
| Feb-16                     | 1.77         | 0.16        | 1.12         | 3.05  | 7.93          | 1.39         | 0.13        | 11.00         | 0.52         |
| Mar-16                     | 2.24         | 0.19        | 0.97         | 3.40  | 8.95          | 1.30         | 0.09        | 15.67         | 0.09         |
| Apr-16                     | 1.66         | 0.17        | 1.16         | 3.00  | 8.32          | 1.43         | 0.14        | 11.89         | 0.59         |
| May-16                     | 1.56         | 0.20        | 1.16         | 2.93  | 8.21          | 1.44         | 0.14        | 11.70         | 0.59         |
| Jun-16                     | 2.15         | 0.23        | 1.18         | 3.56  | 8.51          | 1.45         | 0.15        | 12.59         | 0.42         |
| Jul-16                     | 1.48         | 0.24        | 1.18         | 2.90  | 8.27          | 1.44         | 0.15        | 12.82         | 0.47         |
| Aug-16                     | 2.49         | 0.17        | 1.18         | 3.84  | 8.12          | 1.45         | 0.15        | 11.74         | 0.49         |
| Sep-16                     | 1.71         | 0.23        | 1.12         | 3.06  | 7.76          | 1.38         | 0.14        | 11.96         | 0.47         |
| Oct-16                     | 1.89         | 0.27        | 1.18         | 3.33  | 9.01          | 1.48         | 0.14        | 17.15         | 0.68         |
| Nov-16                     | 2.31         | 0.23        | 1.19         | 3.73  | 8.42          | 1.46         | 0.14        | 15.71         | 0.59         |
| Dec-16                     | 1.72         | 0.22        | 1.16         | 3.10  | 8.60          | 1.45         | 0.14        | 15.25         | 0.81         |
|                            |              |             |              | <i>Current Actual in Tons versus Permit Limit</i> |               |              |             |               |              |
| 12 Mo Tons                 | <b>23.42</b> | <b>2.51</b> | <b>13.76</b> | <b>39.69</b>                                      | <b>100.11</b> | <b>17.07</b> | <b>1.67</b> | <b>157.83</b> | <b>6.48</b>  |
|                            |              |             |              | ROC   | NOx           | PM           | SOx         | CO            | NH3          |
| <b>Permit Limits -&gt;</b> |              |             |              | <b>16.82</b>                                      | <b>132.88</b> | <b>68.3</b>  | <b>2.03</b> | <b>284.93</b> | <b>54.19</b> |



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

February 15, 2017

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 2016

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, 2016 through December 31, 2016 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, x3103 or green.km@pg.com should you have any questions about this certification.

Respectfully,

Kathleen Green  
Interim Site Environmental Leader

Cc:

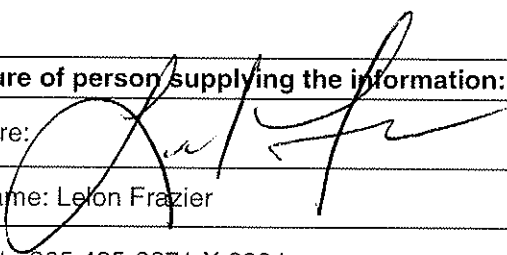
Mr. Lelon Frazier, Plant Manager; P&G  
Mr. Kim Lim, HS&E Leader; P&G  
Mr. Kyle Field, SEL; P&G  
Ms. Chris Cote, AQS; VCAPCD

**EMERGENCY DIESEL ENGINE  
2016 ANNUAL REPORT FORM**

Reporting Period: January 1 through December 31, 2016

**Report Due Date: February 15, 2017**

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:  | <b>Procter &amp; Gamble Paper Products</b>   |                |               | Permit No:   | <b>00015</b>                        |
| Facility Address:   | <b>800 North Rice Avenue</b>   |                |               | Facility Contact:  | Kyle Field,<br>field.ka@pg.com      |
| City:   | <b>Oxnard, CA 93030</b>  |                |               | Phone:   | 805-484-8871 X 2408                 |
| 420 BHP   | <b>Caterpillar Diesel-Fired Emergency Standby Engine, Model 3406, Serial No 61808444, ID: Utility Yard Pump, PG-2, used for fire suppression</b> |                |               |  |                                     |
| Are the details listed above correct? If no, please make corrections.   |  |                |               | Yes  | <input checked="" type="checkbox"/> |
| <b>Reporting Requirements for Calendar 2015</b>   |  |                |               |  |                                     |
|   | Date of Reading  |                |               | Meter Reading  |                                     |
| First of 2016:  | <b>01/07/2016</b>  | First of 2016: | <b>688.00</b> |  |                                     |
| End of 2016:  | <b>01/03/2017</b>  | End of 2016:   | <b>710.03</b> |  |                                     |
| <b>Total annual hours for: Maintenance &amp; Testing:</b>   |  |                |               | <b>20.93</b>   |                                     |
| Hours of Emergency use:   |  |                |               | <b>1.1</b>   |                                     |
| <b>Total Hours of operation:</b>  |  |                |               | <b>22.03</b>   |                                     |
| Has the engine listed above exceeded the permit limit for maintenance and testing? <b>NO</b><br>If yes, please explain here or attach additional pages: |  |                |               |  |                                     |
| <b>Signature of person supplying the information:</b> <i>"I certify that the above information is correct."</i>   |  |                |               |  |                                     |
| Signature:  |   |                |               | Title: Plant Manager   |                                     |
| Print Name:   | Lejon Frazier  |                |               | Date: <b>2/14/17</b>   |                                     |
| Phone #:  | 805 485-8871 X 8924  |                |               | Email: frazier.lf@pg.com   |                                     |
| Send report to:   | Ms. Chris Cote<br>Ventura County Air Pollution Control   |                |               | Chris: (805) 645-1442 <a href="mailto:chrisc@vcapcd.org">chrisc@vcapcd.org</a> |                                     |
| District  | 669 County Square Drive, Second  |                |               | Eric: (805) 645-1496 <a href="mailto:eric@vcapcd.org">eric@vcapcd.org</a>      |                                     |
| Floor   | Ventura, CA 93003  |                |               | Fax: (805) 645-1444  |                                     |
|   |  |                |               | Form#: 00015-50  |                                     |

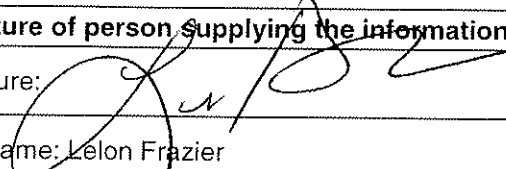


**EMERGENCY DIESEL ENGINE  
2016 ANNUAL REPORT FORM**

Reporting Period: January 1 through December 31, 2016

**Report Due Date: February 15, 2017**

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:  | <b>Procter &amp; Gamble Paper Products</b>   | <b>Permit No: 00015</b>  |                                     |
| Facility Address:   | <b>800 North Rice Avenue</b>   | Facility Contact: Kyle Field,<br>field.ka@pg.com                               |                                     |
| City:   | <b>Oxnard, CA 93030</b>  | Phone: 805-484-8871 X 2408   |                                     |
| 420 BHP   | <b>Caterpillar Diesel-Fired Emergency Standby Engine, Model 3406, Serial No 6TB10913, ID: Utility Yard Pump, PG-3, used for fire suppression</b> |  |                                     |
| Are the details listed above correct? If no, please make corrections.   |  |  |                                     |
|   |  | Yes  | <input checked="" type="checkbox"/> |
|   |  | No   | <input type="checkbox"/>            |
| <b>Reporting Requirements for Calendar 2015</b>   |  |  |                                     |
|   | Date of Reading  |  | Meter Reading                       |
| First of 2016:  | <b>01/07/2016</b>  | First of 2016:   | <b>740.0</b>                        |
| End of 2016:  | <b>01/03/2017</b>  | End of 2016:   | <b>765.3</b>                        |
| <b>Total annual hours for: Maintenance &amp; Testing:</b>   |  |  | <b>23.7</b>                         |
| <b>Hours of Emergency use:</b>  |  |  | <b>1.6</b>                          |
| <b>Total Hours of operation:</b>  |  |  | <b>25.3</b>                         |
| Has the engine listed above exceeded the permit limit for maintenance and testing? <b>NO</b><br>If yes, please explain here or attach additional pages: |  |  |                                     |
| <b>Signature of person supplying the information: "I certify that the above information is correct."</b>  |  |  |                                     |
| Signature:   |  | Title: Plant Manager   |                                     |
| Print Name: Kelon Frazier   |  | Date: <b>2/14/17</b>   |                                     |
| Phone #: 805 485-8871 X 8924  |  | Email: frazier.lf@pg.com   |                                     |
| Send report to: Ms. Chris Cote<br>Ventura County Air Pollution Control  |  | Chris: (805) 645-1442 <a href="mailto:chrisc@vcapcd.org">chrisc@vcapcd.org</a> |                                     |
| District  |  | Eric: (805) 645-1496 <a href="mailto:eric@vcapcd.org">eric@vcapcd.org</a>      |                                     |
| 669 County Square Drive, Second   |  | Fax: (805) 645-1444  |                                     |
| Floor   |  |  |                                     |
| Ventura, CA 93003   |  | Form#: 00015-50  |                                     |

**EMERGENCY DIESEL ENGINE  
2016 ANNUAL REPORT FORM**

Reporting Period: January 1 through December 31, 2016

**Report Due Date: February 15, 2017**

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.

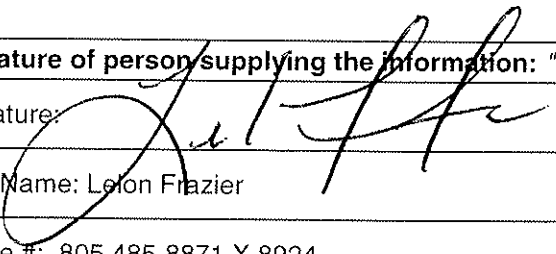
|                   |   |  |
|-------------------|---|--|
| Facility Name:    | <b>Procter &amp; Gamble Paper Products</b>  | Permit No: <b>00015</b>                          |
| Facility Address: | <b>800 North Rice Avenue</b>  | Facility Contact: Kyle Field,<br>field.ka@pg.com |
| City:             | <b>Oxnard, CA 93030</b>   | Phone: 805-484-8871 X 2408                       |
| 210 BHP           | <b>Clarke Detroit Diesel Allison, Inc. Diesel-Fired Emergency Engine, Model JU6HUF50 L1211H, Serial No. PE6068T157094, I.D: Warehouse Pump #2, (PG-5), used for fire suppression.</b> |  |

|   |     |                          |    |                                     |
|---|-----|--------------------------|----|-------------------------------------|
| Are the details listed above correct? If no, please make corrections. | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |
|---|-----|--------------------------|----|-------------------------------------|

| Reporting Requirements for Calendar 2015                  |                   |                |               |
|---|-------------------|----------------|---------------|
|   | Date of Reading   |                | Meter Reading |
| First of 2016:  | <b>01/07/2016</b> | First of 2016: | <b>321.0</b>  |
| End of 2016:  | <b>01/03/2017</b> | End of 2016:   | <b>338.4</b>  |
| <b>Total annual hours for: Maintenance &amp; Testing:</b> |                   |                | <b>17.4</b>   |
| Hours of Emergency use:                                   |                   |                | <b>0.0</b>    |
| <b>Total Hours of operation:</b>                          |                   |                | <b>17.4</b>   |

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:  | Title: Plant Manager   |
| Print Name: Lon Frazier  | Date: <b>2/14/17</b>   |
| Phone #: 805 485-8871 X 8924   | Email: frazier.lf@pg.com   |
| Send report to: Ms. Chris Cote<br>Ventura County Air Pollution Control                         | Chris: (805) 645-1442 <a href="mailto:chrisc@vcapcd.org">chrisc@vcapcd.org</a> |
| District   | Eric: (805) 645-1496 <a href="mailto:eric@vcapcd.org">eric@vcapcd.org</a>      |
| Floor  | Fax: (805) 645-1444  |
| 669 County Square Drive, Second<br>Ventura, CA 93003   | Form#: 00015-50  |

**EMERGENCY DIESEL ENGINE  
2016 ANNUAL REPORT FORM**

Reporting Period: January 1 through December 31, 2016

**Report Due Date: February 15, 2017**

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:    | <b>Procter &amp; Gamble Paper Products</b>  | Permit No: <b>00015</b>                          |
| Facility Address: | <b>800 North Rice Avenue</b>  | Facility Contact: Kyle Field,<br>field.ka@pg.com |
| City:             | <b>Oxnard, CA 93030</b>   | Phone: 805-484-8871 X 2408                       |
| 210 BHP           | <b>Clarke Detroit Diesel Allison, Inc. Diesel-Fired Emergency Engine, Model JU6HUF50, Serial No. PE6068T185639, I.D: Warehouse Pump #1 (PG#4), used for fire suppression.</b> |  |

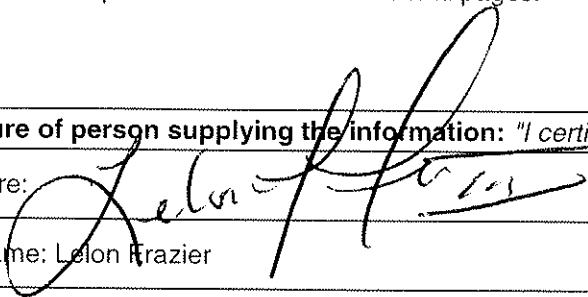
Are the details listed above correct? If no, please make corrections. Yes  No

**Reporting Requirements for Calendar 2016**

|   | Date of Reading   |                | Meter Reading |
|---|-------------------|----------------|---------------|
| First of 2016:  | <b>01/07/2016</b> | First of 2016: | <b>309.9</b>  |
| End of 2016:  | <b>01/03/2017</b> | End of 2016:   | <b>335.1</b>  |
| <b>Total annual hours for: Maintenance &amp; Testing:</b> |                   |                | <b>25.2</b>   |
| Hours of Emergency use:                                   |                   |                | <b>0.0</b>    |
| <b>Total Hours of operation:</b>                          |                   |                | <b>25.2</b>   |

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:   | Title: Plant Manager   |
| Print Name: Lelon Frazier   | Date: <b>2/14/17</b>   |
| Phone #: 805 485-8871 X 8924  | Email: frazier.lf@pg.com   |
| Send report to: Ms. Chris Cote<br>Ventura County Air Pollution Control<br>District<br>669 County Square Drive, Second<br>Floor<br>Ventura, CA 93003 | Chris: (805) 645-1442 <a href="mailto:chrisc@vcapcd.org">chrisc@vcapcd.org</a> |
|   | Eric: (805) 645-1496 <a href="mailto:eric@vcapcd.org">eric@vcapcd.org</a>      |
|   | Fax: (805) 645-1444  |
|   | Form#: 00015-50  |

Opacity Annual Formal Survey  
 Procter & Gamble Oxnard Plant

VCARD Part 70 Permit, Attachment 50 Compliance Document

Conducted On Date: 02/24/10 Time: 5:30 pm  
 Conducted By: Kathleen Green Signature: [Signature]  
 Visible Emissions Certification # 19390  
 Most Recent Certification Date N/A

Permit Emission Points  
 Drawing - RG-3419820

| Stack  | Stack Height (ft) | Stack Dia (sq ft) | Emissions Unit                   | Emission Description   | Stack Position   | Visible Emissions other than Uncombined Water<br>N - If there are no visible emissions for 2.5 minutes<br>Y - If there are visible emissions > 20% or No. 1 Ringelmann for 2.5 minutes |
|--|-------------------|-------------------|----------------------------------|--|--|--|
| S-1  | 62                | 2.10              | Washer Wet Lapper                | IPM  | When Fan motor on  | N  |
| S-2  | 84                | 12.67             | Cogen 2/LM1500 Turbine           | Thermal Output with NOx, CO, SOx, PM, ROC, NH3                                     | Damper closed when 2X is running   | N  |
| S-3  | 27                | 4.40              | B-301 Steam Boiler               | Thermal Output with NOx, CO, SOx, PM, ROC  | FRG closed during SU (1Th) only - 100% Exhaust - otherwise partial exhaust | N  |
| Stack S-4 is not a physical stack but represents the totals stacks from 1X process stacks 4A-4E  |                   |                   |                                  |  |  |  |
| S-4A   | 55                | 4.72              | 1X PreDryer                      | Thermal Output with NOx, CO, SOx, PM, ROC<br>HAF # Burners<br>GR (Cogen #) Burners | Open when 1X running   | N  |
| S-4B   | -                 | -                 | Furnace Cooling                  | Hot Air Release from shell cooling   | Open   | N  |
| S-4C   | -                 | -                 | HRB                              | Thermal Output, NOx, CO, SOx, PM, ROC  | Normally Closed  | N  |
| S-4D   | 150               | 9.63              | Cogen 1/LM2500 Turbine           | Thermal Output, NOx, CO, SOx, PM, ROC  | Damper closed when 1X running  | N  |
| S-4E   | -                 | -                 | W/WL Brake Pulper vent           | IPM  | Open vent  | N  |
| S-5  | -                 | -                 | 1X Scrubber                      | IPM  | When Fan motor on  | N  |
| S-6  | -                 | -                 | 2X Scrubber                      | IPM  | When Fan motor on  | N  |
| Stack S-7 is not physical stack but represents the totals stacks from 2X. NOTE - PreDryer Exhaust is the emission from the YHAF (after drying) |                   |                   |                                  |  |  |  |
| S-7A   | 74                | 12.22             | 2X PreDryer Exhaust (YHAF Stack) | Thermal Output with NOx, CO, SOx, PM, ROC, NH3<br>LM1500 + HAF #PD                 | Normally Open  | N  |
| S-7B   | -                 | -                 | Exhaust Diversion (PDF Stack)    | Thermal Output with NOx, CO, SOx, PM, ROC, NH3                                     | Normally Closed  | N  |
| S-7C   | -                 | -                 | 2X Vacuum Stack                  | IPM  | Open Vent  | N  |
| S-7D   | -                 | -                 | 2X Wet End (Former)              | IPM  | Open Vent  | N  |
| S-7E   | -                 | -                 | 2X Brake Pulper Vent             | IPM  | Open Vent  | N  |
| 2  |                   |                   | Fire Pump #2                     | CARB Fuel Combustion   | Open vent  | N  |
| 3  |                   |                   | Fire Pump #3                     | CARB Fuel Combustion   | Open vent  | N  |
| 4  |                   |                   | Fire Pump #4                     | CARB Fuel Combustion   | Open vent  | N  |
| 5  |                   |                   | Fire Pump #5                     | CARB Fuel Combustion   | Open vent  | N  |

Any Other Visible Emissions? No

Atmospheric Conditions: 72°/clear/Wind 7-10mph SSW/0% precip.  
(WFO LOX weather station)

| Fuel Usage (MMSCF)    | B301         |
|-----------------------|--------------|
| Jan-16                | 0.67         |
| Feb-16                | 4.63         |
| Mar-16                | 44.22        |
| Apr-16                | 0.90         |
| May-16                | 1.59         |
| Jun-16                | 0.01         |
| Jul-16                | 0.00         |
| Aug-16                | 0.01         |
| Sep-16                | 0.01         |
| Oct-16                | 9.84         |
| Nov-16                | 0.01         |
| Dec-16                | 7.79         |
| <b>12 Month Total</b> | <b>69.68</b> |

**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 = 69.6828 \* 1050

AHI = 73,167 MMBTU

**Maximum Potential Heat Input (MPHI)**

Rated Firing Capacity (RFC): 100 MMBTU/hr

Maximum Potential Operating Hours (MPOH): 8784 hrs

$MPHI = RFC * MPOH$

MPHI = 878,400 MMBTU

30% of MPHI (Maximum Allowable): 263520 MMBTU

Maximum Allowable Rolling 12 month Fuel Usage: 250.97 MMSCF

**Capacity Factor (CF)**

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

$CF = AHI / MPHI$

CF = 0.0832957 Ratio

% CF = 8.3% (%CF)

**PO00015PC1.1 RY 2016 Monthly Throughput**

| Month   | PMKG         | CVTG        | Combustion   | Facility Wide Total Emissions |               |              |             |               |              |
|---|--------------|-------------|--------------|-------------------------------|---------------|--------------|-------------|---------------|--------------|
|   | ROC          | ROC         | ROC          | ROC                           | NOx           | PM           | SOx         | CO            | NH3          |
|   | (tons)       | (tons)      | (tons)       | (tons)                        | (tons)        | (tons)       | (tons)      | (tons)        | (tons)       |
| Jan-16  | 2.43         | 0.19        | 1.17         | 3.80                          | 8.01          | 1.42         | 0.16        | 10.35         | 0.75         |
| Feb-16  | 1.77         | 0.16        | 1.12         | 3.05                          | 7.93          | 1.39         | 0.13        | 11.00         | 0.52         |
| Mar-16  | 2.24         | 0.19        | 0.97         | 3.40                          | 8.95          | 1.30         | 0.09        | 15.67         | 0.09         |
| Apr-16  | 1.66         | 0.17        | 1.16         | 3.00                          | 8.32          | 1.43         | 0.14        | 11.89         | 0.59         |
| May-16  | 1.56         | 0.20        | 1.16         | 2.93                          | 8.21          | 1.44         | 0.14        | 11.70         | 0.59         |
| Jun-16  | 2.15         | 0.23        | 1.18         | 3.56                          | 8.51          | 1.45         | 0.15        | 12.59         | 0.42         |
| Jul-16  | 1.48         | 0.24        | 1.18         | 2.90                          | 8.27          | 1.44         | 0.15        | 12.82         | 0.47         |
| Aug-16  | 2.49         | 0.17        | 1.18         | 3.84                          | 8.12          | 1.45         | 0.15        | 11.74         | 0.49         |
| Sep-16  | 1.71         | 0.23        | 1.12         | 3.06                          | 7.76          | 1.38         | 0.14        | 11.96         | 0.47         |
| Oct-16  | 1.89         | 0.27        | 1.18         | 3.33                          | 9.01          | 1.48         | 0.14        | 17.15         | 0.68         |
| Nov-16  | 2.31         | 0.23        | 1.19         | 3.73                          | 8.42          | 1.46         | 0.14        | 15.71         | 0.59         |
| Dec-16  | 1.72         | 0.22        | 1.16         | 3.10                          | 8.60          | 1.45         | 0.14        | 15.25         | 0.81         |
| <i>Current Actual in Tons versus Permit Limit</i> |              |             |              |                               |               |              |             |               |              |
| 12 Mo Tons  | <b>23.42</b> | <b>2.51</b> | <b>13.76</b> | <b>39.69</b>                  | <b>100.11</b> | <b>17.07</b> | <b>1.67</b> | <b>157.83</b> | <b>6.48</b>  |
|   |              |             |              | ROC                           | NOx           | PM           | SOx         | CO            | NH3          |
|   |              |             |              | <b>16.82</b>                  | <b>132.88</b> | <b>68.3</b>  | <b>2.03</b> | <b>284.93</b> | <b>54.19</b> |

Permit Limits ->