



February 12, 2018

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

Subject: RY2017 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, 2017 through December 31, 2017 reporting period. This submission also constitutes the Semi Annual Deviation Report for the time period July 1, 2017 – Dec 31, 2017.

I can be reached at 805-485-8871, x2211 or palmer.em.1@pg.com should you have any questions about our facilities certification.

Respectfully,

Mr. Eric Palmer
Site Environmental Leader

Cc:

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



Ventura County
Air Pollution
Control District

RESPONSIBLE OFFICIAL'S CERTIFICATION FORM

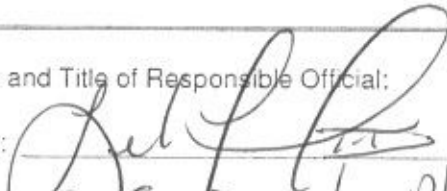
Ventura County APCD Rule 33.9 requires that "any document, including reports, schedule of compliance progress reports and compliance certifications, required by a Part 70 permit shall be certified by a responsible official." Therefore, this form shall be signed by the company's Responsible Official and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

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

Daniel Cho
Air Quality Engineer
Ventura County Air Pollution Control District
669 County Square Drive
Ventura, CA 93003

Certification by Responsible Official

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

Signature and Title of Responsible Official:	Date:
Signature: 	2/12/18
Title: P&G Oxnard Plant Mgr	

2017 Reporting Year

Annual Title V Compliance Certification

For

The Procter & Gamble Paper Products Company
Oxnard, CA Facility

VCAPCD Permit No. 00015

Contact: Eric Palmer
Site Environmental Leader
805-485-8871 x2211
Palmer.em.1@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, 2017 - December 31, 2017

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

Permit Section: 4

Permitted Emissions Table

This is a summary of requirements.

Specific and enforceable permit terms and conditions are found in other sections of the permit.

Compliance Certification is not applicable to this summary information.

Permit Section: 5

Exempt Equipment List (Insignificant Activities Table)

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

Permit Section: 6

Specific Applicable Requirements (Attachments)



Period Covered by Compliance Certification: January 1, 2017 - December 31, 2017

<p>A. Attachment # or Permit Condition #: Section 6 – Attachment 74.6 (11/11/03)</p>	<p>D. Frequency of monitoring: Monthly</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: N/A</p>
<p>C. Method of monitoring: 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 < 21 g/l ROC (per SDS 4/27/2015) QSOL 300 Cleaning Solvent is Certified Clean Air Solvent (per SDS 9/2/2014)</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: INTERMITTENT</p> <p>H. *Excursions, Exceedence, or other non-compliance: YES</p> <p>See Deviation Summary</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2017 - December 31, 2017

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2017 - December 31, 2017

<p>A. Attachment # or Permit Condition #: Section 6 - 74.15 N.1</p>	<p>D. Frequency of monitoring: Biennial</p>
<p>B. Description: Boilers, Heater Treaters, Steam Generators, and Process Heaters</p> <p>Condition 1 – Emissions: NOx < 40 ppmvd, CO < 400 ppmvd</p> <p>Condition 2 – Source Tested every 24 months using ARB Method 100</p> <p>Condition 3.a-b - Alternate Fuel Use limitations</p> <p>Condition 4 – Startup emissions exemption</p> <p>Condition 5 – Recordkeeping: Alternate Fuels, Biennial Source test report</p> <p>Condition 6 – Flue Gas Recirculation requirements per Section 7</p>	<p>E. Source test reference method: Source Test Summary Form 1 of 4</p> <p>ARB Method 100: NOx CO Stack Gas O2</p>
<p>C. Method of monitoring:</p> <p>Condition 1 & 2 -3/30/2016 Source Test demonstrated compliance</p> <p>Condition 3 – Only Natural Gas was used for the 2017 calendar year.</p> <p>Condition 4 – Instructional Condition; Certification not applicable.</p> <p>Condition 5 – No alternate fuel utilized. Source Test report furnished to District on time.</p> <p>Condition 6 – Compliance with applicable Section 7 flue gas recirculation requirements.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2017 - December 31, 2017

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



Period Covered by Compliance Certification: January 1, 2017 - December 31, 2017

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



Period Covered by Compliance Certification: January 1, 2017 - December 31, 2017

<p>A. Attachment # or Permit Condition #: Section 6 – Attachment STRMLN15LM6000-NOx-rev291</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: LM6000 Gas Turbine Based Cogeneration Unit</p> <p><u>Condition 1, 2, 4, & 6</u> - NOx < 2.5 ppmvd avg. @ 15% O2 over 3 hr. period, Annual Source Test, and CEMs, ROC <2.0 ppmvd @ 15% O2 average over 3 consecutive hrs. Operate Oxidation Catalyst & test annually, Outlet Ammonia < 20 ppmvd verified annually via source test, PM < 3.08 lbs/MMscf & source test using ARB Method 5 upon District request</p> <p><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 & 8.a-c</u> - Operate and maintain CEMs & record permit specified data, CEMs calibration and maintenance per 40 CFR, part 51, Appendix P, Sections 3.0 through 3.9.5</p> <p><u>Condition 9</u> - Written Notification of monitored emission standards violations within 96 hours</p> <p><u>Condition 10.a-d & 11</u> - Permanent CEMs records, to include permit specified data, Upon request submit CEMs data to District</p> <p><u>Condition 12 & 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 & annual source test report</p>	<p>E. Source test reference method Source Test Summary Form 2 of 4</p> <p>EPA Method 20 -NOx ARB Method 100 -CO, O2 EPA Method 18 -ROC ASTM Method D 3588-91 - Fuel HV BAAQMD Method ST-1B-NH3</p>
<p>C. Method of monitoring: Condition 1, 2, 4, 5, & 6 – Annual source test conducted on March 27, 2017. Condition 2, 7, 10, 11, 13 – Recordkeeping. Condition 3 – Exemptions applied as required throughout the calendar year. Condition 5 – Utilize certified Source Test vendors, use specified test methods, and submit documentation per deadline requirements. Condition 8 - Maintenance via operators with assistance from CEM manufacturer. Condition 9 – Operational procedures ensure compliance with 96 hour reporting requirement. Condition 12 – Data Acquisition System data reduction and recordkeeping per specification. Condition 14 – Turbine report submitted semi-annually, source test submitted annually.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2017 - December 31, 2017

<p>A. Attachment # or Permit Condition #: Section 6 – Attachment STRMLN15LM2500-NOx,CO-rev 391</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: GE LM-2500 Gas Turbine Based Cogeneration Unit NOx and CO Applicable Requirements</p> <p>Condition 1 – 3 Hour NOx average < 24 ppmvd @ 15% O2 while burning Natural Gas Condition 2 – Emissions Exemption: 1 hr for startup & shutdown Condition 3 – Source Test Annually at normal operating load. Test Notification and protocol submitted 15 days in advance with report submitted within 45 days after test to include permit specified parameters. Condition 4 – Operate and maintain CEMs & record permit specified data. Condition 5 – CEMs calibration and maintenance per 40 CFR, part 51, Appendix P, Sections 3.0 through 3.9.5. Condition 6 – Written Notification of emissions violations within 96 hours. Condition 7 – Permanent CEMs records, to include permit specified data. Condition 8 – Upon request submit CEMs data to District. Condition 9 – CEMs data reduced per 40 CFR, part 51, appendix P, paragraphs 5.0 – 5.3.3. Condition 10 – Records maintained per permit conditions. Condition 11 – Turbine Operating hours report & annual source test report.</p>	<p>E. Source test reference method See Source Test Summary Form 3 of 4</p> <p>EPA Method 20 -NOx ARB Method 100 -CO, O2 ASTM Method D 3588-91 - Fuel HV</p>
<p>C. Method of monitoring:</p> <p>Condition 1, 3 – Annual source performed on May 24, 2017 Condition 1, 2, 4, 7, 8, 9, 10 – Recordkeeping Condition 5 – Maintenance via operators with assistance from CEMs manufacturer Condition 6 – Operational procedures ensure compliance with 96 hour reporting requirement Condition 11 – Turbine report submitted semi-annually, source test submitted annually</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2017 - December 31, 2017

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



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2017 - December 31, 2017

<p>A. Attachment # or Permit Condition #: Section 6 – Attachment NESHAP KK</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: 40 CFR Part 63 Subpart KK Applicable Requirements</p> <p>Condition 1 – Use < 10 Ton per 12 month rolling period of each HAP</p> <p>Condition 2 – Use < 25 tons total per 12 month rolling period for all HAPs</p> <p>Condition 3 – HAP exclusion for various activities</p> <p>Condition 4 – Considered Area Source if 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 N/A</p>
<p>C. Method of monitoring: Conditions 1 – 6: In 2017, 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? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2017 - December 31, 2017

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



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2017 - December 31, 2017

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

Permit Section: 7

Permit Specific Conditions (Attachments)



Period Covered by Compliance Certification: January 1, 2017 - December 31, 2017

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



Period Covered by Compliance Certification: January 1, 2017 - December 31, 2017

<p>A. Attachment # or Permit Condition #: Section 7 – Attachment PO00015PC2-rev 411, 431, 441</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Combustion Emissions Units- LM6000, LM2500, B&W Steam Boiler, 1X Hot Air, 1X Yankee Furnace, 2X Furnaces</p> <p>Condition 1 – Specifies monitoring requirements and calculations to demonstrate compliance with TPY emissions limits for Combustion Unit group identified in this condition. Condition 2 – Restricts fuel used in specified combustion units to Natural Gas (NG) Condition 3 – Maintain records: 12 mo. Rolling average fuel usage and emissions based on Emission Factors and CEM units specified in this condition and condition 1 above. Condition 4 - The Table 4 CO hourly lb./hour for the LM2500 shall be demonstrated by the annual source test requirement in STRMLIN15LM2500-NOx, CO. Condition 5 - The Table 4 CO hourly lb./hour for the LM600 shall be demonstrated by the annual source test requirement in STRMLIN15LM6000-NOx. Condition 6 - Permission to operate a rental boiler that is < 100 MMBTU/hr as an alternative to operating the 100 MMBTU/hr B-301 Boiler for up to 12 months. While in use, PO00015PC2 shall apply and PO00015PC4 shall not apply. The temporary boiler shall be equipped with Low NOx burners to meet the PO00015PC2 emissions limitations for the B-301 Boiler and shall maintain documentation that the temporary boiler meets the B-301 emission limitations and records of usage of the temporary rental boiler.</p>	<p>E. Source test reference method N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1 – Monthly monitoring of emissions records to ensure compliance with combustion emission limits. Condition 2 – Facility exclusively utilized PUC Natural Gas to fire all permitted combustion units at facility. Condition 3 - CEMS data from the turbines is used to maintain 12 month rolling averages for NOx, CO, and NH3. All other 12 month rolling averages are maintained by Emission Factors and fuel use. Condition 4 & 5 - Source Test records demonstrating the Table 4 limits for each turbine was performed and submitted per the STRMLN Requirements for each turbine. Condition 6 - Alternative Operating Scenario was not utilized in RY2017</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedance, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2017 - December 31, 2017

<p>A. Attachment # or Permit Condition #:</p> <p>Section 7 – Attachment PO00015PC3-rev351</p>	<p>D. Frequency of monitoring: Condition 2 - Semi Annual Condition 3 - Permit Term Condition 4 - Bi Annual</p>
<p>B. Description: 2X Papermachine Hot Air Furnace and "Yankee" Hood Furnace Requirements</p> <p>Condition 1 –Emission limitations: NOx < 0.08 lb./MMBTU, CO < 0.045 lb./MMBTU</p> <p>Condition 2 –Fuel and air settings locked in position as specified in permit. Settings recorded every 6 months</p> <p>Condition 3 – Source test the Hot Air before March 31, 2013 using ARB Method 100 for NOx, CO and O2. Notification & Test Protocol to District 15 days in advance. Report within 45 after test.</p> <p>Condition 4 – Perform a Screening Analysis with portable analyzer or perform a Source Test on the Yankee Hot Air Furnace once every 24 months using ARB Method 100 for NOx, CO and O2. Notification & Test Protocol to District 15 days in advance. Report within 45 after test.</p>	<p>E. Source test reference method: ARB Method 100: NOx CO Stack Gas O2 See Source Test Form 4 of 4</p>
<p>C. Method of monitoring:</p> <p>Condition 1 - Both Furnaces demonstrated compliance to the NOx and CO limits per their last Source Test</p> <p>Condition 2 – Fuel Linkage settings for the Yankee and Hot Air Furnaces were monitored in January and July to meet requirement</p> <p>Condition 3 - Condition requirements were met as demonstrated in the submitted 2012 Source Test Report.</p> <p>Condition 4 - Condition requirements were met as demonstrated in the submitted 2016 Source Test Report.</p>	<p>F. Currently in Compliance? YES*</p> <p>G. Compliance Status: INTERMITTENT**</p> <p>H. *Excursions, exceedances, or other non-compliance: Yes</p> <p>See deviation summary</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2017 - December 31, 2017

A. Attachment # or Permit Condition #: Section 7 – Attachment PO00015PC4 –rev 411, 431, 441	D. Frequency of monitoring: Monthly
B. Description: Flue Gas Recirculation (FGR) Requirements for Babcock & Wilcox Steam Boiler Condition 1.a-b – FGR system settings locked (physically pinned) in place per permit specifications. Parameters to be monitored, measured, and recorded on monthly basis.	E. Source test reference method N/A
C. Method of monitoring: Parameters to be monitored, measured, and recorded on monthly basis.	F. Currently in Compliance? YES G. Compliance Status: CONTINUOUS H. *Excursions, Exceedance, or other non-compliance: NO



Period Covered by Compliance Certification: January 1, 2017 - December 31, 2017

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



**ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM**

Period Covered by Compliance Certification: January 1, 2017 - December 31, 2017

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2017 - December 31, 2017

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2017 - December 31, 2017

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, 2017 - December 31, 2017

A. Attachment # or Permit Condition #: Section 8 – Attachment Rule 50 (04/13/04)	D. Frequency of monitoring: Monthly
B. Description: Opacity Condition 1 – 3 Minute emissions in hour less than 20% Opacity Condition 2 – Routine Surveillance and record of visible emissions other than uncombined water Condition 3 – Annual compliance certification, including site survey Condition 4 – EPA Method 9 survey per District request	E. Source test reference method: N/A
C. Method of monitoring: Condition 1 & 2 – No visible emissions were observed in 2017 Condition 3 - Opacity Survey completed on Sept28th, 2017 Condition 4 - Perform EPA Method 9 survey upon District request	F. Currently in Compliance? YES G. Compliance Status: CONTINUOUS H. *Excursions, Exceedence, or other non-compliance: NO



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2017 - December 31, 2017

<p>A. Attachment # or Permit Condition #: Section 8 – Attachment 54.B.1 (01/14/14)</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Sulfur Compounds – Sulfur Emissions from Combustion Operations at Point of Discharge</p> <p>Condition 1 – Point of Discharge SO₂ concentrations < 300 ppmvd (corrected to 3% oxygen for boilers and 15% oxygen for turbines), from combustion operations specified.</p> <p>Condition 2 – Comply with fuel Sulfur content limits per Rule 64. No monitoring required.</p> <p>Condition 3 – Upon District Request determine point of Discharge concentrations of SO₂</p>	<p>E. Source test reference method: N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1 – Compliance with permit condition Attachment P00015PC2. Only PUC-quality natural gas and CARB approved diesel used on site in 2017</p> <p>Conditions 2 – Fuel Oil Sulfur Content provided by supplier at each delivery. Gaseous sulfur content meeting PUC Quality requirements. Data furnished to district upon request.</p> <p>Condition 3 – Furnish District with data upon request.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2017 - December 31, 2017

<p>A. Attachment # or Permit Condition #: Section 8 - Attachment 54.B.2 (01/14/14)</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Sulfur compounds – SO2 Concentrations</p> <p>Condition 1 – Property Line SO2 concentrations: 1 hr. < 0.25 ppmvd, 24 hr. < 0.04 ppmvd</p> <p>Condition 2 - Property line 1 hour sulfur dioxide limit of 0.075 ppm</p> <p>Condition 3 – Provide fuel or exhaust analysis along with modeling data or other demonstration to District upon request</p> <p>Condition 4a-c – Upon District Request determine ground level concentrations of SO2</p>	<p>E. Source test reference method: N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1 - Compliance with permit condition Attachment P00015PC2. Only PUC-quality natural gas, and CARB approved diesel used on site in 2017</p> <p>Conditions 2 – If the District requires ambient air monitoring, test methods specified will be employed.</p> <p>Conditions 3 - Fuel Analysis provided by suppliers at request of facility. Exhaust analysis based on emissions factors incorporated into facility AB2588 Health Risk Assessment.</p> <p>Condition 4– Furnish District with data upon request.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2017 - December 31, 2017

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



Period Covered by Compliance Certification: January 1, 2017 - December 31, 2017

A. Attachment # or Permit Condition #: Section 8 – Attachment 57.1 (01/11/05)	D. Frequency of monitoring: Monthly
B. Description: Particulate Matter Emissions from Fuel Burning Equipment Condition 1 – PM shall not exceed 0.12 lbs/Mmbtu Condition 2 – Compliance demonstration required upon district request Condition 3 – Periodic monitoring not required. Certify compliance by referring to District Rule 57.B analysis dated 12/3/97	E. Source test reference method: N/A
C. Method of monitoring: Condition 1 – Satisfy Conditions 2 & 3 of this attachment. Condition 2 – Monitoring is not required based on district analysis (Per comments in permit, Table 1.C.3, Condition 57.1) Condition 3 – Periodic monitoring is not required. Compliance certified via District analysis of Rule 57.B, dated 12/3/97.	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, 2017 - December 31, 2017

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2017 - December 31, 2017

A. Attachment # or Permit Condition #: Section 8 – Attachment 64.B.2 (04/13/99)	D. Frequency of monitoring: Monthly
B. Description: Sulfur Content of Fuels – Liquid Fuel Requirements Condition 1 – No liquid Fuel usage with sulfur content > 0.5% by weight Condition 2 – If only use ARB quality liquid fuel compliance is assured without monitoring Condition 3 – Requirements for use of non ARB liquid fuels	E. Source test reference method: N/A
C. Method of monitoring: Conditions 1 & 2 – Maintain records of exclusive use of ARB compliant liquid fuel used on site in 2017 – No other monitoring is required. Condition 3 – Monitor per permit requirements if use non-ARB quality liquid fuel	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, 2017 - December 31, 2017

<p>A. Attachment # or Permit Condition #: Section 8 – Attachment 74.6 (11/11/03)</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Surface Cleaning and Degreasing</p> <p><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 < 900 g/l ROC & < 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 > 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: N/A</p>
<p>C. Method of monitoring:</p> <p>Conditions 1–4, 6-7: Compliance for permit conditions pertaining to solvent storage and handling is satisfied via personnel training and observation. Chemical Approval System ensures conformity with solvent ROC content limits.</p> <p>Condition 5: Facility does not use halogenated cold cleaner solvents</p> <p>Conditions 8-10: Cold cleaners are exempt per section 5 of Site Title V permit.</p> <p>Condition 11: Exempted Solvents including Cold Cleaner Solvent is maintained on 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? YES</p> <p>G. Compliance Status: INTERMITTENT**</p> <p>H. *Excursions, Exceedence, or other non-compliance: YES</p> <p>See deviation summary</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2017 - December 31, 2017

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2017 - December 31, 2017

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

Permit Section: 9-11

General Requirements for Short-Term Activities (Attachments)

General Permit Conditions

Miscellaneous Federal Program Conditions



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2017 - December 31, 2017

<p>A. Attachment # or Permit Condition #: Section 9 – Attachment 74.1</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Abrasive Blasting</p> <p>Condition 1.a-c: Abrasive Blasting shall be conducted indoors, using specified methods</p> <p>Condition 2.a-d: For Outdoor blasting use steel or iron shot/grit or utilize specified alternate methods</p> <p>Condition 3 – Adhere to Rule 74.1.B.2 requirements for pavement marking</p> <p>Condition 4 – Stucco and concrete blasting per Rule 74.1.B.3</p> <p>Condition 5 – Use California approved and labeled materials for abrasive blasting</p> <p>Condition 6 – Comply with visible emissions standard per rule 74.1.C.2</p> <p>Condition 7.a-e: Routine Surveillance and visual inspection of blasting operations. Surveillance to include permit specified recordkeeping.</p>	<p>E. Source test reference method: N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1.a-c: Abrasive Blasting shall be conducted indoors, using specified methods</p> <p>Condition 2.a-d: Approved abrasive blasting material was used for outdoor blasting.</p> <p>Condition 3 – Adhere to Rule 74.1.B.2 requirements for pavement marking</p> <p>Condition 4 – No stucco or concrete blasting occurred in 2017</p> <p>Condition 5 – Use California approved and labeled materials for abrasive blasting</p> <p>Condition 6 – Comply with visible emissions standard per rule 74.1.C.2</p> <p>Condition 7.a-e: Routine Surveillance and visual inspection of blasting operations. Surveillance to include permit specified recordkeeping.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



Period Covered by Compliance Certification: January 1, 2017 - December 31, 2017

<p>A. Attachment # or Permit Condition #: Section 9 – Attachment 74.2 (01/12/10)</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Architectural Coatings</p> <p>Condition 1.a-c: VOC Coating content limits, less water and exempt OC's, Flat <100 g/l; Nonflat <150 g/l; Nonflat High Gloss <250 g/l</p> <p>Condition 2 – Specialty coatings shall conform with Rule 74.2 Table of Standards. Industrial Maintenance <250 g/l less water & exempt OC's</p> <p>Condition 3 – Architectural coatings and cleaning materials to remain closed except when in use.</p> <p>Condition 4 – Adhere to Rule 74.2.B.1 thinning requirements</p> <p>Condition 5 – Routine Surveillance of architectural coating operations: Maintain VOC data on coatings used, and submit to district upon request</p> <p>Condition 6 – VOC content and other properties measured per procedures in Rule 74.2.G</p>	<p>E. Source test reference method N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1, 2 – All paints used at facility are reviewed for compliance prior to approval for use.</p> <p>Condition 3 – Closure requirements are documented / training provided to all site personnel and contractors.</p> <p>Condition 4 – 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? YES</p> <p>G. Compliance Status: INTERMITTENT</p> <p>H. *Excursions, Exceedence, or other non-compliance: Yes</p> <p>See Deviation Summary</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2017 - December 31, 2017

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 2017	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, 2017 - December 31, 2017

<p>A. Attachment # or Permit Condition #: Section 9 - Attachment 40 CFR 61.M</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: National Emissions Standards for Asbestos Condition 1 – Comply with 40 CFR part 61, Subpart M Condition 2 – Adhere to 40 CFR part 61.145 requirements for Demolition and Renovation.</p>	<p>E. Source test reference method N/A</p>
<p>C. Method of monitoring: Condition 1 – Site Asbestos abatement program managed consistent with 40 CFR Part 61, Subpart M. State certified contractors are utilized for ACM demolition and renovation. Adherence with 40 CFR Part 61.145 is mandatory for job approval. Condition 2 – ACM demolition and renovation are observed by site resources to ensure compliance with 40 CFR Part 61.145. Activities involving ACM recorded are filed with Site Environmental Leader. Notification is provided to District prior to ACM renovation or demolition for activities requiring notification. No applicable activities occurred during 2017.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2017 - December 31, 2017

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2017 - December 31, 2017

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

A. Attachment # or Permit Condition #: Section 10 – Shield 60KKKK	D. Frequency of monitoring: Monthly
B. Description: Permit Shield – Standards of Performance for Stationary Combustion Turbines Reference Information Only	E. Source test reference method N/A
C. Method of monitoring: Not Applicable - Reference Information only	F. Currently in Compliance? YES
	G. Compliance Status: CONTINUOUS
	H. *Excursions, Exceedence, or other non-compliance:

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2017 - December 31, 2017

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

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

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2017 - December 31, 2017

A. Attachment # or Permit Condition #: Section 10 – Attachment PO General	D. Frequency of monitoring: Monthly
B. Description: General Permit to Operate Conditions Condition 1 – Can petition Hearing Board within 30 days of receiving permit to alter conditions. Condition 2 – Post Permit reasonably close to equipment – Table 2 is sufficient if remainder of permit available elsewhere. Condition 3 – Permit is not transferable to another location. Condition 4 – Permit may be suspended if requested information is not furnished	E. Source test reference method N/A
C. Method of monitoring: Condition 1 – Reference Information only. Condition 2 – Table 2 posted close to equipment and remainder of permit available electronically everywhere in plant. Condition 3 – Permit and sources are not transferred or located in alternate locations. Condition 4 – Information requested by District is furnished within requested time.	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, 2017 - December 31, 2017

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2017 - December 31, 2017

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

Source Tests



Ventura County Air
Pollution Control
District

ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: January 1, 2017- December 31, 2017

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

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



ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: January 1, 2017- December 31, 2017

A. Emission Unit Description: LM6000 Turbine			B. Pollutant NOx
C. Measured Emission Rate: 2.35 ppm @ 15% O2	D. Limited Emission Rate: 2.5 ppm @ 15% O2	E. Specific Source Test: P27-074-FRCOMP	F. Test Date 3/27/2017

A. Emission Unit Description: LM6000 Turbine			B. Pollutant CO
C. Measured Emission Rate: 6.51 lb/hour	D. Limited Emission Rate: 10.20 lb/hour	E. Specific Source Test: P27-074-FRCOMP	F. Test Date 3/27/2017

A. Emission Unit Description: LM6000 Turbine			B. Pollutant O2
C. Measured Emission Rate: 14.45 %	D. Limited Emission Rate: N/A	E. Specific Source Test: P27-074-FRCOMP	F. Test Date 3/27/2017

A. Emission Unit Description: LM6000 Turbine			B. Pollutant Heat Rate
C. Measured Emission Rate: 449.00 MMBtu/hour	D. Limited Emission Rate: N/A	E. Specific Source Test: P27-074-FRCOMP	F. Test Date 3/27/2017

A. Emission Unit Description: LM6000 Turbine			B. Pollutant NH3
C. Measured Emission Rate: 1.01 ppm @ 15% O2	D. Limited Emission Rate: 20 ppm @ 15% O2	E. Specific Source Test: P27-074-FRCOMP	F. Test Date 3/27/2017

A. Emission Unit Description: LM6000 Turbine			B. Pollutant ROC
C. Measured Emission Rate: < 0.37 ppm @ 3% O2	D. Limited Emission Rate: 2.0 ppm @ 3% O2	E. Specific Source Test: P27-074-FRCOMP	F. Test Date 3/27/2017



ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: January 1, 2017- December 31, 2017

A. Emission Unit Description: LM2500 Turbine			B. Pollutant NOx
C. Measured Emission Rate: 20.70 ppm @ 15% O2	D. Limited Emission Rate: 24 ppm @ 15% O2	E. Specific Source Test: P27-074-FR COMP	F. Test Date 5/24/2017

A. Emission Unit Description: LM2500 Turbine			B. Pollutant CO
C. Measured Emission Rate: 33.70 lb/hour	D. Limited Emission Rate: 180.13 lb/hour	E. Specific Source Test: P27-074-FR COMP	F. Test Date 5/24/2017

A. Emission Unit Description: LM2500 Turbine			B. Pollutant O2
C. Measured Emission Rate: 14.27 %	D. Limited Emission Rate: N/A	E. Specific Source Test: P27-074-FR COMP	F. Test Date 5/24/2017

A. Emission Unit Description: LM2500 Turbine			B. Pollutant Heat Rate
C. Measured Emission Rate: 233.00 MMbtu/hour	D. Limited Emission Rate: N/A	E. Specific Source Test: P27-074-FR COMP	F. Test Date 5/24/2017



ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

7Period Covered by Compliance Certification: January 1, 2017- December 31, 2017

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

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

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

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

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

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

Deviations



DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 01/01/2017 to 12/31/2017

<p>A. Attachment # or Permit Condition #: Attachment 74.6 (11/11/03) Condition 1.c. NOTE: This deviation is also captured in Section 6 Rule 74.6 of ACC Report. Rule 74.6 condition are duplicated in Section 6 and Section 8 of our permit.</p>	<p>B. Equipment description: Solvent Cleaning Activity</p>	<p>C. Deviation Period: Date: 01/01/2017 - 08/25/2017 When Discovered: Date: 06/30/2017</p>
<p>D. Parameters monitored: Solvents used for cleaning ≤ 25 g/l</p>	<p>E. Limit: Solvents used for cleaning ≤ 25 g/l</p>	<p>F. Actual: ≥ 25 g/l</p>
<p>G. Probable Cause of Deviation New data was obtained for a surface cleaner that indicated VOC was > 25 g/l as supplied.</p>	<p>H. Corrective actions taken:</p> <ol style="list-style-type: none"> 1. Product was immediately removed from approval list and all reorders of the material were cancelled. 2. New product meets Rule 74.6 limits 3. Removal of all non-compliant surface cleaner was verified on 8/25/17 	

<p>A. Attachment # or Permit Condition #: Attachment PO00015PC5-441 Condition 3.c</p>	<p>B. Equipment description: Papermaking Scrubbers</p>	<p>C. Deviation Period: Dates: 01/01/2017 – 10/06/17 When Discovered: Date: 6/23/2017</p>
<p>D. Parameters monitored: Condition 3.c – Strict Adherence to Site Written Operating and Maintenance Plan</p>	<p>E. Limit: Daily confirmation by operators as described in Operating and Maintenance Plan required in Condition 3.c</p>	<p>F. Actual: Daily confirmation by other site personnel to confirm compliance, but not in real time.</p>
<p>G. Probable Cause of Deviation A Proficy data glitch prevented operators from being able to document daily average confirmations in real time. However, review of data by site personnel confirms compliance with daily average requirements of the scrubber flow and pressure drop throughout the period.</p>	<p>H. Corrective actions taken: A change to the Proficy System was implemented with ongoing refinement so that operators can document scrubber parameter daily confirmations in real time. All refinements were implemented before 10/6/17.</p>	



DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 01/01/2017 to 12/31/2017

A. Attachment # or Permit Condition #: Section 9 Part 70 General Condition 14	B. Equipment description: Source Test Protocols	C. Deviation Period: Dates: 3/10/2017 When Discovered: Date: 3/10/2017
D. Parameters monitored: N/A	E. Limit: All documents shall be certified by a responsible official	F. Actual: Source test protocol for Cogen 2 test was not signed by a responsible official
G. Probable Cause of Deviation Newly established internal procedure to ensure source test protocols are certified did not account for time needed for stack test vendor to develop updated protocol.	H. Corrective actions taken: Revised internal procedure to include more time for protocol development and Responsible Official certification. This year's test protocol is in progress to ensure proper certification.	

A. Attachment # or Permit Condition #: Attachment 74.2(01/12/10) Condition 5	B. Equipment description: Industrial Maintenance Coating was improperly used for Traffic Marking	C. Deviation Period: Date: 4/18/2017 When Discovered: Date: 4/19/2017
D. Parameters monitored: Routine Surveillance to ensure compliance with Rule 74.2	E. Limit: Traffic Markings – 100 g/l	F. Actual: (Industrial Maintenance Coatings) Macropoxy 646 Fast Cure Polyamide Epoxy – 250 g/l
G. Probable Cause of Deviation Individuals conducting painting misunderstood site paint use restrictions in Site Standard.	H. Corrective actions taken: Site Standard was updated to more specifically clarify which paints and coatings can be used for which purposes at the site and the standard was re-distributed facility wide.	



DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 01/01/2017 to 12/31/2017

<p>A. Attachment # or Permit Condition #: Attachment 74.2(01/12/10) Condition 1</p>	<p>B. Equipment description: Non-compliant paint was improperly used to paint the Main Hallway</p>	<p>C. Deviation Period: Date: 07/29/2017 – 7/30/2017 When Discovered: Date: 7/31/2017</p>
<p>D. Parameters monitored: Routine Surveillance to ensure compliance with Rule 74.2</p>	<p>E. Limit: Nonflat Coating <= 50 g/l</p>	<p>F. Actual: Liquid Magic Wall Magnetic Paint 250 g/l</p>
<p>G. Probable Cause of Deviation Individuals overseeing paint job did not follow existing Site Standard.</p>	<p>H. Corrective actions taken: Feedback was given to the individuals overseeing the paint job to prevent reoccurrence. Site Standard was updated to more specifically clarify which paints and coatings can be used for which purposes at the site and the standard was re-distributed facility wide. In addition, the site reinforced expectations of bringing new changes including paints through the site's chemical approval process.</p>	

<p>A. Attachment # or Permit Condition #: Attachment PO00015PC3-351 Condition 2</p>	<p>B. Equipment description: 2X Yankee Hood Furnace</p>	<p>C. Deviation Period: Dates: 07/01/2017 – 12/31/17 When Discovered: Date: 2/13/2018</p>
<p>D. Parameters monitored: Air Setting monitored, measured, and recorded every 6 months.</p>	<p>E. Limit: Every 6 months</p>	<p>F. Actual: Record of setting recorded 8 months after last record</p>
<p>G. Probable Cause of Deviation New individual responsible for record creation. Record was due prior to completion of training.</p>	<p>H. Corrective actions taken: Revised internal procedure and provided coaching to ensure timely completion of the measurement and records creation. (Note that two records were completed within the 2017 calendar year and the setting remained the same and in compliance.)</p>	

February 12, 2018

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 2017

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, 2017 through December 31, 2017 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, x2211 or palmer.em.1@pg.com should you have any questions about this certification.

Respectfully,



Eric Palmer
Site Environmental Leader

Cc:

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



Ventura County
Air Pollution
Control District

RESPONSIBLE OFFICIAL'S CERTIFICATION FORM


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

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

Daniel Cho
Air Quality Engineer
Ventura County Air Pollution Control District
669 County Square Drive
Ventura, CA 93003

Certification by Responsible Official

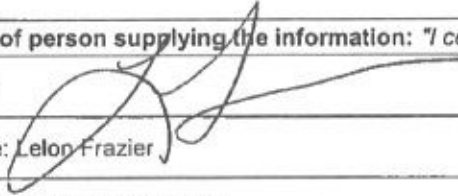
I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this document is true, accurate, and complete.

<p>Signature and Title of Responsible Official:</p> <p>Signature: </p> <p>Title: <u>APC Air Quality Mgr</u></p>	<p>Date: <u>2/12/18</u></p>
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**EMERGENCY DIESEL ENGINE
2017 ANNUAL REPORT FORM**

Reporting Period: January 1 through December 31, 2017
Report Due Date: February 15, 2018

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

Facility Name:	Procter & Gamble Paper Products	Permit No:	00015
Facility Address:	800 North Rice Avenue	Facility Contact:	Eric Palmer, palmer.em.1@pg.com
City:	Oxnard, CA 93030	Phone:	805-484-8871 X 2211
210 BHP	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.		
Are the details listed above correct? If no, please make corrections.		Yes	<input type="checkbox"/>
		No	<input checked="" type="checkbox"/>
Reporting Requirements for Calendar 2017			
	Date of Reading		Meter Reading
First of 2017:	01/03/2017	First of 2017:	335.1
End of 2017:	01/02/2018	End of 2017:	361.2
Total annual hours for: Maintenance & Testing:			26.1
Hours of Emergency use:			0.0
Total Hours of operation:			26.1
Has the engine listed above exceeded the permit limit for maintenance and testing? NO If yes, please explain here or attach additional pages:			
Signature of person supplying the information: "I certify that the above information is correct."			
Signature:			
Title:	Plant Manager		
Print Name:	Lelon Frazier	Date:	2/1/18
Phone #:	805 485-8871 X 8924	Email:	frazier.lf@pg.com
Send report to:	Ms. Chris Cote Ventura County Air Pollution Control District 669 County Square Drive, Second Floor Ventura, CA 93003	Chris:	(805) 645-1442 chrisc@vcapcd.org
		Eric:	(805) 645-1496 eric@vcapcd.org
		Fax:	(805) 645-1444
		Form#:	00015-50

**EMERGENCY DIESEL ENGINE
2017 ANNUAL REPORT FORM**

Reporting Period: January 1 through December 31, 2017

Report Due Date: February 15, 2018

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

Facility Name:	Procter & Gamble Paper Products		Permit No: 00015	
Facility Address:	800 North Rice Avenue		Facility Contact: Eric Palmer, palmer.em.1@pg.com	
City:	Oxnard, CA 93030		Phone: 805-484-8871 X 2408	
210 BHP	Clarke Detroit Diesel Allison, Inc. Diesel-Fired Emergency Engine, Model JU6HUF50 L1211H, Serial No. PE6068T157094, I.D: Warehouse Pump #2, (PG-5), used for fire suppression.			
Are the details listed above correct? If no, please make corrections.			Yes	<input type="checkbox"/>
			No	<input checked="" type="checkbox"/>
Reporting Requirements for Calendar 2017				
	Date of Reading		Meter Reading	
First of 2017:	01/03/2017	First of 2017:	338.4	
End of 2017:	01/02/2018	End of 2017:	364.2	
Total annual hours for: Maintenance & Testing:			25.8	
Hours of Emergency use:			0.0	
Total Hours of operation:			25.8	
Has the engine listed above exceeded the permit limit for maintenance and testing? NO If yes, please explain here or attach additional pages:				
Signature of person supplying the information: "I certify that the above information is correct."				
Signature:			Title: Plant Manager	
Print Name: Lejon Frazier			Date: 2/1/18	
Phone #: 805 485-8871 X 8924			Email: frazier.lf@pg.com	
Send report to: Ms. Chris Cote Ventura County Air Pollution Control District 669 County Square Drive, Second Floor Ventura, CA 93003			Chris: (805) 645-1442 chrisc@vcapcd.org Eric: (805) 645-1496 eric@vcapcd.org Fax: (805) 645-1444 Form#: 00015-50	

**EMERGENCY DIESEL ENGINE
2017 ANNUAL REPORT FORM**

Reporting Period: January 1 through December 31, 2017
Report Due Date: February 15, 2018

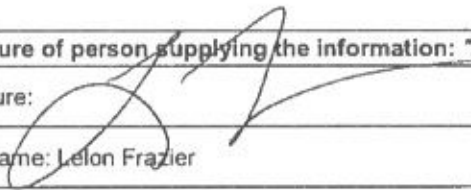
Your APCD Permit to Operate requires your facility to submit reports of the annual hours of operation and/or maintenance and testing, and emergency use for each diesel emergency engine. If the annual operating hours, excluding emergency operation, exceed the specified annual permit limit, please include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

Facility Name:	Procter & Gamble Paper Products		Permit No: 00015
Facility Address:	800 North Rice Avenue		Facility Contact: Eric Palmer, palmer.em.1@pg.com
City:	Oxnard, CA 93030	Phone: 805-484-8871 X 2211	
420 BHP	Caterpillar Diesel-Fired Emergency Standby Engine, Model 3406, Serial No 61808444, ID: Utility Yard Pump, PG-2, used for fire suppression		
Are the details listed above correct? If no, please make corrections.			
		Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
Reporting Requirements for Calendar 2017			
	Date of Reading		Meter Reading
First of 2017:	01/03/2017	First of 2017:	710.03
End of 2017:	01/02/2018	End of 2017:	731.2
Total annual hours for: Maintenance & Testing:			20
Hours of Emergency use:			1.2
Total Hours of operation:			21.2
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: 2/1/18		
Phone #: 805 485-8871 X 8924	Email: frazier.lf@pg.com		
Send report to: Ms. Chris Cote Ventura County Air Pollution Control District 669 County Square Drive, Second Floor Ventura, CA 93003	Chris: (805) 645-1442 chris@vcapcd.org Eric: (805) 645-1496 eric@vcapcd.org Fax: (805) 645-1444 Form#: 00015-50		

**EMERGENCY DIESEL ENGINE
2017 ANNUAL REPORT FORM**

Reporting Period: January 1 through December 31, 2017
Report Due Date: February 15, 2018

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

Facility Name:	Procter & Gamble Paper Products		Permit No: 00015		
Facility Address:	800 North Rice Avenue		Facility Contact: Eric Palmer, palmer.em.1@pg.com		
City:	Oxnard, CA 93030		Phone: 805-484-8871 X 2211		
420 BHP	Caterpillar Diesel-Fired Emergency Standby Engine, Model 3406, Serial No 6TB10913, ID: Utility Yard Pump, PG-3, used for fire suppression				
Are the details listed above correct? If no, please make corrections.			Yes	No	X
Reporting Requirements for Calendar 2017					
	Date of Reading		Meter Reading		
First of 2017:	01/03/2017	First of 2017:	765.3		
End of 2017:	01/02/2018	End of 2017:	785		
Total annual hours for: Maintenance & Testing:			19.3		
Hours of Emergency use:			0.9		
Total Hours of operation:			20.2		
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: 2/1/18			
Phone #: 805 485-8871 X 8924		Email: frazier.lf@pg.com			
Send report to: Ms. Chris Cote Ventura County Air Pollution Control District 669 County Square Drive, Second Floor Ventura, CA 93003		Chris: (805) 645-1442 chris@vcapcd.org			
		Eric: (805) 645-1496 eric@vcapcd.org			
		Fax: (805) 645-1444			
		Form#: 00015-50			

Opacity Annual Formal Survey
Procter & Gamble Oxnard Plant

VCAPCD Part 70 Permit, Attachment 50 Compliance Document

Conducted On Date: 9/28/17 Time: 9:00 am - 11:30
 Conducted By: Kurt Nelson Green Signature: [Signature]
 Visible Emissions Certification #: N/A
 Most Recent Certification Date: N/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 N - if there are no visible emissions for 2 3minutes Y- if there are visible emissions > .20% or No. 1 Ringelmann for 2 3minutes
S-1	62	2.10	Washer Wet Lapper	PM	When Fan motor on	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 HAF + Burners OR Cogen + Burners	Open when 1X running	N
S-4B	-	-	Furnace Cooling	Hot Air Release from shell cooling	Open	N
S-4C	-	-	HRB	Thermal Output, NOx, CO, SOx, PM, ROC	Normally Closed	N
S-4D	50	9.63	Cogen 1/LM2500 Turbine	Thermal Output, NOx, CO, SOx, PM, ROC	Damper closed when 1X running	N
S-4E	-	-	W/WL 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 LM6000 + HAF + PD	Normally Open	N
S-7B	-	-	Exhaust Divertion (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

PO00015, Attachment 103N; Capacity Factor: Babcock & Wilcox Boiler

B301	
Fuel Usage (MMSCF)	
Jan-17	0.86
Feb-17	3.33
Mar-17	4.29
Apr-17	0.35
May-17	5.71
Jun-17	0.03
Jul-17	0.22
Aug-17	0.24
Sep-17	0.03
Oct-17	4.39
Nov-17	0.02
Dec-17	1.46
12 Month Total	20.94

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 = 20.9356 * 1050

AHI = 21,982 MMBTU

Maximum Potential Heat Input (MPHI)

Capacity Factor (CF)

Rated Firing Capacity (RFC): 100 MMBTU/hr

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

Maximum Potential Operating Hours (MPOH): 8760 hrs

CF = AHI / MPHI

MPHI = RFC * MPOH

MPHI = 876,000 MMBTU

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

Maximum Allowable Rolling 12 month Fuel Usage: 250.29 MMSCF

CF = 0.025094 Ratio

% CF = 2.5% (%CF)

PO00015PC1.1 RY 2017 Monthly Throughput

Month	PMKG	CVTG	Total Facility	Cumbustion Emissions					
	ROC (tons)	ROC (tons)	ROC (tons)	ROC (tons)	NOx (tons)	PM (tons)	SOx (tons)	CO (tons)	NH3 (tons)
Jan-17	2.49	0.26	3.97	1.21	8.73	1.49	0.15	14.58	0.58
Feb-17	2.41	0.27	3.80	1.12	8.19	1.39	0.14	13.24	0.50
Mar-17	2.61	0.22	3.83	1.00	8.23	1.23	0.14	11.15	0.53
Apr-17	2.36	0.40	3.92	1.15	8.22	1.41	0.14	14.56	0.51
May-17	2.37	0.46	3.83	1.00	7.03	1.24	0.13	13.41	0.60
Jun-17	2.36	0.50	4.01	1.15	8.25	1.42	0.14	15.67	0.44
Jul-17	2.46	0.31	3.96	1.20	9.95	1.47	0.15	13.00	0.45
Aug-17	2.52	0.39	4.12	1.21	8.55	1.48	0.15	15.80	0.47
Sep-17	2.26	0.44	3.84	1.14	7.95	1.40	0.14	14.25	0.44
Oct-17	2.45	0.43	4.08	1.20	9.34	1.49	0.15	18.09	0.50
Nov-17	2.38	0.38	3.95	1.19	8.52	1.46	0.14	17.51	0.51
Dec-17	2.54	0.32	4.02	1.17	9.36	1.44	0.15	17.60	0.54
				<i>Current Actual in Tons versus Permit Limit</i>					
12 Mo Tons	29.21	4.40	47.34	13.73	102.32	16.92	1.72	178.85	6.08
				ROC	NOx	PM	SOx	CO	NH3
Permit Limits ->				16.82	132.88	68.3	2.03	284.93	54.19



February 12, 2017

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

Subject: Semi Annual Report - Permit to Operate No. 0015
Excursion Report for 1X, and 2X Paper Machine Dry End Scrubbers
Report Period: 7/1/17 – 12/31/17

Mr. Searcy:

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

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

I can be reached at 805-485-8871, x2211 or palmer.em.1@pg.com should you have any questions about this certification.

Respectfully,

Eric Palmer
Site Environmental Leader

Cc:

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



Ventura County
Air Pollution
Control District

RESPONSIBLE OFFICIAL'S CERTIFICATION FORM

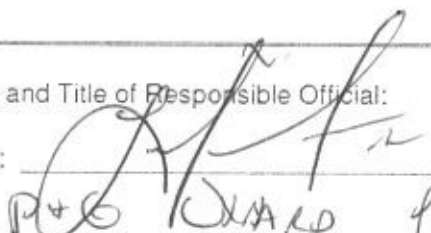
Ventura County APCD Rule 33.9 requires that *"any document, including reports, schedule of compliance progress reports and compliance certifications, required by a Part 70 permit shall be certified by a responsible official."* Therefore, this form shall be signed by the company's Responsible Official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

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

Daniel Cho
Air Quality Engineer
Ventura County Air Pollution Control District
669 County Square Drive
Ventura, CA 93003

Certification by Responsible Official

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

<p>Signature and Title of Responsible Official:</p> <p>Signature: </p> <p>Title: <u>Plant Mgr</u></p>	<p>Date: <u>2/12/13</u></p>
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Ventura County Air Pollution Control District
Part 70 - Semi Annual Scrubber Excursion Report

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

Report Period:	January 1, 2017 – June 30, 2017
Subject Units:	2 Dry End Scrubbers: 1X Paper Machine and 2X Paper Machine

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

Excursion Details –

Date	Duration	Cause	Corrective Action
None	--	--	--

The report above satisfies requirements identified in our facility Part 70 Permit, Attachment PO00015PC5, Condition 3.e.

February 12, 2017

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

Subject: Semi Annual Report - Permit to Operate No. 0015
Actual Annual Operating Hours for LM2500 and LM6000 Turbines
Report Period: 1/1/17- 12/31/17

Mr. Searcy:

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

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

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

I can be reached at 805-485-8871, x2211 or palmer.em.1@pg.com should you have any questions about this certification.

Respectfully,



Eric Palmer
Site Environmental Leader

Cc:

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



Ventura County
Air Pollution
Control District

RESPONSIBLE OFFICIAL'S CERTIFICATION FORM

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

Daniel Cho
Air Quality Engineer
Ventura County Air Pollution Control District
669 County Square Drive
Ventura, CA 93003

Certification by Responsible Official

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

Signature and Title of Responsible Official	Date:
Signature: 	2/12/18
Title: <u>Plant Manager</u>	

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

SUMMARY REPORT
ANNUAL OPERATING HOURS AND SOURCE TEST RESULTS

Reporting Period Dates: From 1/1/17 through 12/31/17

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

Certification or Audit: May 24, 2017 (Annual Source Test)
Process Unit Description: LM-2500 Gas Turbine (Cogen I)

Total Source Operating
Time in Reporting Period: 8285.90

SOURCE TEST SUMMARY

Pollutant	Measured Emissions	Permit Limit
Oxides of Nitrogen, ppm @15% O ₂	20.70	24
Carbon Monoxide, lb/hr	33.70	180.13

Refer to Horizon Test report # P27_074_FR_COMP for additional details.

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

SUMMARY REPORT
ANNUAL OPERATING HOURS AND SOURCE TEST RESULTS

Reporting Period Dates: From 1/1/17 through 12/31/17

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

Certification or Audit: March 27, 2017 (Annual Source Test)
Process Unit Description: LM-6000 Gas Turbine (Cogen II)

Total Source Operating
Time in Reporting Period: 8566.77

SOURCE TEST SUMMARY

Pollutant	Measured Emissions	Permit Limit
Oxides of Nitrogen, ppm @15% O ₂	2.35	2.5
Carbon Monoxide, lb/hour	6.51	10.20
Reactive Organic Compounds, ppm @15%	< 0.37	2.0
Ammonia, ppm @ 15% O ₂	1.01	20

Please refer to Horizon Test report # P27-074-FR COMP for additional details.