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P&G
The P&G Paper Product Co.
800 North Rice Avenue
Oxnard, CA 93030
www.pg.com

February 11, 2019

Mrs. Michelle Wood
AQS, Inspector
Ventura County APCD
669 County Square Drive
Ventura, California 93003

Subject: RY2018 Annual Title V Compliance Certification and Semi Annual Deviation Report

Mrs. Wood:

Enclosed is The Procter & Gamble Paper Products Company's Oxnard facility, Part 70 Permit No. 00015 Compliance Certification for the January 1, 2018 through December 31, 2018 reporting period. This submission also constitutes the Semi Annual Deviation Report for the time period July 1, 2018 – Dec 31, 2018.

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

**ANNUAL COMPLIANCE CERTIFICATION
SIGNATURE COVER FORM**

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

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

Confidentiality

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

Certification by Responsible Official

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

<p>Signature and Title of Responsible Official:</p>  <p>Title:</p> <p>P+6 OXNARD PLANT Mgr</p>	<p>Date:</p> <p>2/11/19</p>
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<p>Time Period Covered by Compliance Certification</p> <p>01/01/2018 (MM/DD/YY) to 12/31/2018 (MM/DD/YY)</p>
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Ventura County Air
Pollution Control
District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2018 - December 31, 2018

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



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2018 - December 31, 2018

<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 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. 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: 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, 2018 - December 31, 2018

<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, 2018 - December 31, 2018

<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: NO_x < 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: NO_x CO Stack Gas O₂</p>
<p>C. Method of monitoring: Condition 1 & 2 -3/30/2018 Source Test demonstrated compliance</p> <p>Condition 3 – Only Natural Gas was used for the 2018 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, 2018 - December 31, 2018

<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>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2018 - December 31, 2018

<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, 2018 - December 31, 2018

<p>A. Attachment # or Permit Condition #: Section 6 – Attachment STRMLN15LM6000-NOx-rev291</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: LM6000 Gas Turbine Based Cogeneration Unit</p> <p>Condition 1, 2, 4, & 6 - NOx < 2.5 ppmvd avg. @ 15% O2 over 3 hr. period, Annual Source Test, and CEMs, ROC <2.0 ppmvd @ 15% O2 average over 3 consecutive hrs. Operate Oxidation Catalyst & test annually, Outlet Ammonia < 20 ppmvd verified annually via source test, PM < 3.08 lbs/MMscf & source test using ARB Method 5 upon District request</p> <p>Condition 3: Emissions Exemption: 12 hr cold startup, 3 hr normal-startup, 2 hr unplanned load changes, and 1 hr shutdown</p> <p>Condition 5.a-f - Source Test Annually at normal operating load. Test Notification and protocol submitted 15 days in advance with report submitted within 45 days of test to include permit specified parameters</p> <p>Condition 7.a-l & 8.a-c - Operate and maintain CEMs & record permit specified data, CEMs calibration and maintenance per 40 CFR, part 51, Appendix P, Sections 3.0 through 3.9.5</p> <p>Condition 9 - Written Notification of monitored emission standards violations within 96 hours</p> <p>Condition 10.a-d & 11 - Permanent CEMs records, to include permit specified data, Upon request submit CEMs data to District</p> <p>Condition 12 & 13 - CEMs data reduced per 40 CFR, part 51, appendix P, paragraphs 5.0 – 5.3.3. Records maintained per permit conditions</p> <p>Condition 14.a-b - Turbine Operating hours report & annual source test report</p>	<p>E. Source test reference method Source Test Summary Form 2 of 4</p> <p>EPA Method 20 -NOx ARB Method 100 -CO, O2 EPA Method 18 -ROC ASTM Method D 3588-91 - Fuel HV BAAQMD Method ST-1B-NH3</p>
<p>C. Method of monitoring: Condition 1, 2, 4, 5, & 6 – Annual source test conducted on March 13, 2018. 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, 2018 - December 31, 2018

<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 22, 2018 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, 2018 - December 31, 2018

<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, 2018 - December 31, 2018

<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 2018, 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, 2018 - December 31, 2018

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, 2018 - December 31, 2018

<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: INTERMITTENT**</p> <p>H. *Excursions, Exceedence, or other non-compliance: Yes</p> <p>See deviation summary</p>



Period Covered by Compliance Certification: January 1, 2018 - December 31, 2018

<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, 2018 - December 31, 2018

<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: 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 RY2018</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, 2018 - December 31, 2018

<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 2018 Source Test Report.</p> <p>Condition 4 - Condition requirements were met as demonstrated in the submitted 2018 Source Test Report.</p>	<p>F. Currently in Compliance? YES*</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, exceedances, or other non-compliance: No</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2018 - December 31, 2018

<p>A. Attachment # or Permit Condition #: Section 7 – Attachment PO00015PC4 –rev 411, 431, 441</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>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.</p>	<p>E. Source test reference method N/A</p>
<p>C. Method of monitoring: Parameters to be monitored, measured, and recorded on monthly basis.</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, 2018 - December 31, 2018

<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, 2018 - December 31, 2018

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, 2018 - December 31, 2018

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 excesss 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, 2018 - December 31, 2018

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2018 - December 31, 2018

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 2018 Condition 3 - Opacity Survey completed on Sept28th, 2018 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, 2018 - December 31, 2018

<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 2018</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, 2018 - December 31, 2018

<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 2018</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, 2018 - December 31, 2018

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2018 - December 31, 2018

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2018 - December 31, 2018

A. Attachment # or Permit Condition #: Section 8 – Attachment 64.B.1 (04/13/99)	D. Frequency of monitoring: Monthly
B. Description: Sulfur Content of Fuels – Gaseous Fuel Requirements Condition 1 – Gaseous Fuel sulfur compounds < 788 ppmvd Condition 2 – Periodic Monitoring not required if using PUC Natural Gas Condition 3 – Analyze fuel if using non-PUC quality fuel Condition 4a-b – Monitoring required if landfill or oilfield gaseous fuel is used	E. Source test reference method: N/A
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.	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, 2018 - December 31, 2018

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 2018 – 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



Period Covered by Compliance Certification: January 1, 2018 - December 31, 2018

<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: 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, 2018 - December 31, 2018

<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, 2018 - December 31, 2018

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



Period Covered by Compliance Certification: January 1, 2018 - December 31, 2018

<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 2018</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>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2018 - December 31, 2018

<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: 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, 2018 - December 31, 2018

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.	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, 2018 - December 31, 2018

A. Attachment # or Permit Condition #: Section 9 - Attachment 40 CFR 61.M	D. Frequency of monitoring: Monthly
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.	E. Source test reference method N/A
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 2018.	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, 2018 - December 31, 2018

<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:</p> <p>Condition 1, All deviations from Title V requirements are reported as required.</p> <p>Condition 2, 4, 7-9, 11-12: Not applicable - Instructional conditions.</p> <p>Condition 3 – Internal administrative procedures.</p> <p>Condition 5 – Electronic databases and hard copy archives used for 5 year data retention.</p> <p>Condition 6 – Reports submitted to district</p> <p>Condition 10 – Internal Administrative procedures. Records of payments exist.</p> <p>Condition 13 -15: Internal Administrative procedures.</p>	<p>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, 2018 - December 31, 2018

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, 2018 - December 31, 2018

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 Institutional 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, 2018 - December 31, 2018

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, 2018 - December 31, 2018

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, 2018 - December 31, 2018

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



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: 24.60 ppm @3% O2	D. Limited Emission Rate: 40 ppm @ 3% O2	E. Specific Source Test: P27-076-FR-B301	F. Test Date 3/5/2018

A. Emission Unit Description: B-301 Boiler			B. Pollutant CO
C. Measured Emission Rate: 175.00 ppm @ 3% O2	D. Limited Emission Rate: 400 ppm @ 3% O2	E. Specific Source Test: P27-076-FR-B301	F. Test Date 3/5/2018



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: LM6000 Turbine			B. Pollutant NOx
C. Measured Emission Rate: 2.37 ppm @ 15% O2	D. Limited Emission Rate: 2.5 ppm @ 15% O2	E. Specific Source Test: P27-076-FRCOMP	F. Test Date 3/13/2018

A. Emission Unit Description: LM6000 Turbine			B. Pollutant CO
C. Measured Emission Rate: 6.38 lb/hour	D. Limited Emission Rate: 10.20 lb/hour	E. Specific Source Test: P27-076-FRCOMP	F. Test Date 3/13/2018

A. Emission Unit Description: LM6000 Turbine			B. Pollutant O2
C. Measured Emission Rate: 14.74 %	D. Limited Emission Rate: N/A	E. Specific Source Test: P27-076-FRCOMP	F. Test Date 3/13/2018

A. Emission Unit Description: LM6000 Turbine			B. Pollutant Heat Rate
C. Measured Emission Rate: 437.00 MMbtu/hour	D. Limited Emission Rate: N/A	E. Specific Source Test: P27-076-FRCOMP	F. Test Date 3/13/2018

A. Emission Unit Description: LM6000 Turbine			B. Pollutant NH3
C. Measured Emission Rate: 0.68 ppm @ 15% O2	D. Limited Emission Rate: 20 ppm @ 15% O2	E. Specific Source Test: P27-076-FRCOMP	F. Test Date 3/13/2018

A. Emission Unit Description: LM6000 Turbine			B. Pollutant ROC
C. Measured Emission Rate: < 0.39 ppm @ 3% O2	D. Limited Emission Rate: 2.0 ppm @ 3% O2	E. Specific Source Test: P27-076-FRCOMP	F. Test Date 3/13/2018



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: 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: P27-076-FR COMP	F. Test Date 5/22/2018

A. Emission Unit Description: LM2500Turbine			B. Pollutant CO
C. Measured Emission Rate: 24.90 lb/hour	D. Limited Emission Rate: 180.13 lb/hour	E. Specific Source Test: P27-076-FR COMP	F. Test Date 5/22/2018

A. Emission Unit Description: LM2500 Turbine			B. Pollutant O2
C. Measured Emission Rate: 14.36 %	D. Limited Emission Rate: N/A	E. Specific Source Test: P27-076-FR COMP	F. Test Date 5/22/2018

A. Emission Unit Description: LM2500 Turbine			B. Pollutant Heat Rate
C. Measured Emission Rate: 227.00 MMbtu/hour	D. Limited Emission Rate: N/A	E. Specific Source Test: P27-076-FR COMP	F. Test Date 5/22/2018



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: 0.05 lb/Mmbtu	D. Limited Emission Rate: 0.080 lb/Mmbtu	E. Specific Source Test: P27-076-FR2X	F. Test Date 3/28/2018

A. Emission Unit Description: 2X Predryer Hot Air Furnace (70 Mmbtu/hour)			B. Pollutant CO
C. Measured Emission Rate: <0.0158 lb/Mmbtu	D. Limited Emission Rate: 0.045 lb/Mmbtu	E. Specific Source Test: P27-076-FR2X	F. Test Date 3/28/2018

A. Emission Unit Description: 2X Predryer Hot Air Furnace (70 Mmbtu/hour)			B. Pollutant O2
C. Measured Emission Rate: 19.80 %	D. Limited Emission Rate: N/A	E. Specific Source Test: P27-076-FR2X	F. Test Date 3/28/2018

A. Emission Unit Description: 2X Yankee Hot Air Furnace (40 Mmbtu/hour)			B. Pollutant NOx
C. Measured Emission Rate: 0.05 lb/Mmbtu	D. Limited Emission Rate: 0.080 lb/Mmbtu	E. Specific Source Test: P27-076-FR2X	F. Test Date 3/28/2018

A. Emission Unit Description: 2X Yankee Hot Air Furnace (40 Mmbtu/hour)			B. Pollutant CO
C. Measured Emission Rate: <0.0158 lb/Mmbtu	D. Limited Emission Rate: 0.045 lb/Mmbtu	E. Specific Source Test: P27-076-FR2X	F. Test Date 3/28/2018

A. Emission Unit Description: 2X Yankee Hot Air Furnace (40 Mmbtu/hour)			B. Pollutant O2
C. Measured Emission Rate: 19.80 %	D. Limited Emission Rate: N/A	E. Specific Source Test: P27-076-FR2X	F. Test Date 3/28/2018



DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 01/01/2018 to 12/31/2018

A. Attachment # or Permit Condition #: Attachment PO00015PC5-441 Condition 3.c	B. Equipment description: Papermaking Scrubbers	C. Deviation Period: Dates: 01/01/2018 – 12/31/18 When Discovered: Date: 1/3/2019
D. Parameters monitored: Condition 3.c – Strict Adherence to Site Written Operating and Maintenance Plan	E. Limit: Daily confirmation by operators as described in Operating and Maintenance Plan required in Condition 3.c	F. Actual: Daily confirmation generally conducted throughout the year. However, we found a few gaps in which the confirmation was not completed per the plan.
G. Probable Cause of Deviation We discovered that some individuals were not fully implementing the desired improvements.	H. Corrective actions taken: We've secured reinforcements to establish a weekly health check to ensure this daily confirmation is being completed daily as described in the Operating and Maintenance Plan.	

A. Attachment # or Permit Condition #: Attachment 40CFR63ZZZN3 Condition 1.	B. Equipment description: Fire Pumps	C. Deviation Period: Date: 01/01/2018 - 12/31/2018 When Discovered: Date: 1/3/2019
D. Parameters monitored: Emergency engine required maintenance	E. Limit: Every 500/1000 operating hours or Annually	F. Actual: ≥ 1 year
G. Probable Cause of Deviation Fire pump owner failed to follow Maintenance Plan	H. Corrective actions taken: Feedback was given to the Fire Pump owner to prevent reoccurrence. Maintenance was completed immediately after the deviation was discovered. In addition, the site implemented additional checks to ensure the required maintenance is completed on time.	



DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 01/01/2018 to 12/31/2018

A. Attachment # or Permit Condition #: Attachment PO00015PC5-441 Condition 3.c	B. Equipment description: Wetlapper Scrubbers	C. Deviation Period: Date: 10/1/18-11/19/18 When Discovered: Date: 12/15/18
D. Parameters monitored: Condition 3.c – Strict Adherence to Site Written Operating and Maintenance Plan	E. Limit: Primary recordkeeping as described in Operating and Maintenance Plan required in Condition 3.c	F. Actual: Recordkeeping generally maintained on Experion Server, however daily average records could not be retrieved during the deviation period for the Wet Lapper
G. Probable Cause of Deviation A glitch in the Experion server prevented the storage of daily average data records during the deviation period for the Wet Lapper.	H. Corrective actions taken: New server owner being trained on Operating and Maintenance records requirements. In addition, improvements are being made to the Experion Server to ensure compliance records are maintained and uncompromised.	



Ventura County
Air Pollution
Control District

**RESPONSIBLE OFFICIAL'S
CERTIFICATION FORM**

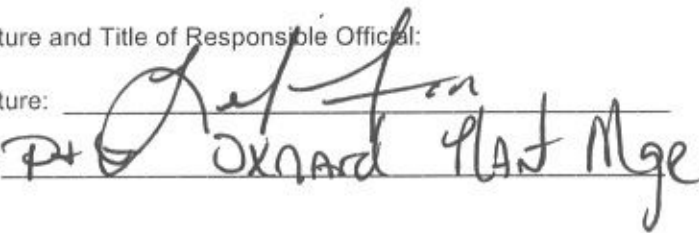
Ventura County APCD Rule 33.9 requires that "any document, including reports, schedule of compliance progress reports and compliance certifications, required by a Part 70 permit shall be certified by a responsible official." Therefore, this form shall be signed by the company's Responsible Official and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

Ed Swede
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: 	2/11/19
Title: <u>Plant Mgr</u>	

February 11, 2019

Michelle Wood
AQS, Inspector
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: 1/1/18- 12/31/18

Mrs. Wood:

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

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

SUMMARY REPORT
ANNUAL OPERATING HOURS AND SOURCE TEST RESULTS

Reporting Period Dates: From 1/1/18 through 12/31/18

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

Certification or Audit: May 22, 2018 (Annual Source Test)
Process Unit Description: LM-2500 Gas Turbine (Cogen I)

Total Source Operating
Time in Reporting Period: 8558.63

SOURCE TEST SUMMARY

Pollutant	Measured Emissions	Permit Limit
Oxides of Nitrogen, ppm @15% O ₂	20.70	24
Carbon Monoxide, lb/hr	24.90	180.13

Refer to Horizon Test report # P27_076_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 1/1/18 through 12/31/18

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

Certification or Audit: March 13, 2018 (Annual Source Test)
Process Unit Description: LM-6000 Gas Turbine (Cogen II)

Total Source Operating
Time in Reporting Period: 8599.47

SOURCE TEST SUMMARY

Pollutant	Measured Emissions	Permit Limit
Oxides of Nitrogen, ppm @15% O ₂	2.37	2.5
Carbon Monoxide, lb/hour	6.38	10.20
Reactive Organic Compounds, ppm @15%	< 0.39	2.0
Ammonia, ppm @ 15% O ₂	0.68	20

Please refer to Horizon Test report # P27-076-FR COMP for additional details.



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:

Ed Swede
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: Signature:  Title: <u>P&G Onroad Plant Mgr</u>	Date: <u>2/14/19</u>
--	----------------------

February 11, 2019

Mrs. Michelle Wood
AQS, Inspector
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: 7/1/18 – 12/31/18

Mrs. Wood:

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
Part 70 - Semi Annual Scrubber Excursion Report

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

Report Period:	January 1, 2018 – June 30, 2018
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.

This page is intended for internal use ONLY

Embedded Excel Workbooks contain:

DT Log – Proficy Report showing DT for entire calendar year

PC5.3a - A list of days where the machine was down (PC5.3a)

ADJ DT - A collection of the hourly averages used for any day where a daily average was adjusted to remove DT. (This page is intended to be printed out and submitted to VCAPCD when they request to see the Scrubber Reports)

Month – A tab for each month contains hourly averages, daily averages, and adjusted daily averages when DT was removed.

SA Compliance – A list of all days in the calendar year where daily average were below permit requirement and the adjusted value and /or if the value was not adjusted because the Papermachine was down for the entire day

1X Paper Machine: There were several days in October where Proficy was not collecting DT. Daily Averages for 10/18 and 10/21 did not meet compliance limits and there was no DT to show for it. In lieu of the Proficy Downtime report, a different Proficy report is used to show the times Parent Rolls were created on the 1X machine. During the periods of low hourly averages on 10/18 and 10/21, no PRs were created.

NET – This is not an excursion because the quality report showing times where PR were NOT created is a suitable replacement for the DT report.



2016 1X Scrubber
Reports - official.xls

2X Paper Machine: I accidentally deleted the July Experion Data load. The daily averages used for this report are from Proficy. Proficy extracts the daily average from Experion. The Daily average from Experion match the daily averages when data is extracted manually from Experion.

There were no days in the month of July that were below the permit requirement so hourly data was not needed to adjust for downtime. Hourly averages are still needed and they do exist in the Experion Archive. To access it, E&I needs to temporarily move the archive over to the main server. A request has been made to do this. When the data is available, I will download it and paste it to the July tab. There will be NO change in the daily average.

NET- We have the hourly averages "available" so this is not an excursion.



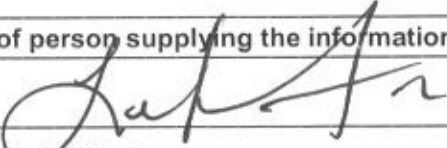
2016 2X Scrubber
Reports - Official.xls

**EMERGENCY DIESEL ENGINE
2018 ANNUAL REPORT FORM**

Reporting Period: January 1 through December 31, 2018

Report Due Date: February 15, 2019

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	X	No	
Reporting Requirements for Calendar 2018							
	Date of Reading			Meter Reading			
First of 2018:	01/02/2018		First of 2018:	361.2			
End of 2018:	01/03/2019		End of 2018:	387.1			
Total annual hours for: Maintenance & Testing:				25.9			
Hours of Emergency use:				0.0			
Total Hours of operation:				25.9			
Has the engine listed above exceeded the permit limit for maintenance and testing? NO If yes, please explain here or attach additional pages: See attachment							
Signature of person supplying the information: "I certify that the above information is correct."							
Signature: 			Title: Plant Manager				
Print Name: Lebron Frazier			Date: 2/11/19				
Phone #: 805 485-8871 X 8924			Email: frazier.lf@pg.com				
Send report to: Ms. Chris Cote Ventura County Air Pollution Control District			Chris: (805) 645-1442 chrisc@vcapcd.org				
			Eric: (805) 645-1496 eric@vcapcd.org				
			Fax: (805) 645-1444				

669 County Square Drive, Second Floor

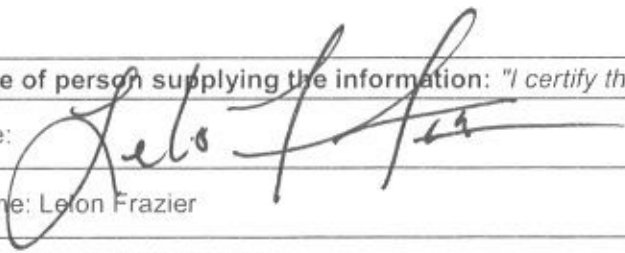
Ventura, CA 93003

Form#: 00015-50

**EMERGENCY DIESEL ENGINE
2018 ANNUAL REPORT FORM**

Reporting Period: January 1 through December 31, 2018
Report Due Date: February 15, 2019

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	No
			<input type="checkbox"/>	<input checked="" type="checkbox"/>
Reporting Requirements for Calendar 2018				
	Date of Reading		Meter Reading	
First of 2018:	01/02/2018	First of 2018:	364.2	
End of 2018:	01/03/2019	End of 2018:	389.2	
Total annual hours for: Maintenance & Testing:			25	
Hours of Emergency use:			0.0	
Total Hours of operation:			25	
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>"I certify that the above information is correct."</i>				
Signature:			Title: Plant Manager	
Print Name: Leion Frazier			Date: 2/6/19	
Phone #: 805 485-8871 X 8924			Email: frazier.lf@pg.com	
Send report to: Ms. Chris Cote Ventura County Air Pollution Control District			Chris: (805) 645-1442 chrisc@vcapcd.org Eric: (805) 645-1496 eric@vcapcd.org	

669 County Square Drive, Second Floor	Fax: (805) 645-1444
Ventura, CA 93003	Form#: 00015-50

**EMERGENCY DIESEL ENGINE
2018 ANNUAL REPORT FORM**
Reporting Period: January 1 through December 31, 2018
Report Due Date: February 15, 2019

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	

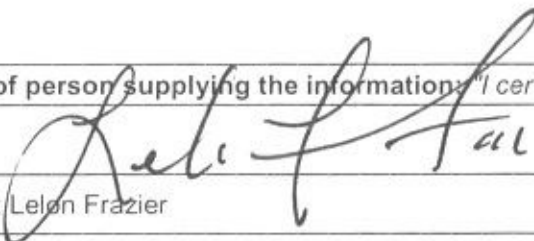
Are the details listed above correct? If no, please make corrections.	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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Reporting Requirements for Calendar 2017			
	Date of Reading		Meter Reading
First of 2017:	01/02/2018	First of 2017:	731.2
End of 2017:	01/03/2019	End of 2017:	751.3
Total annual hours for: Maintenance & Testing:			18.5
Hours of Emergency use:			1.6
Total Hours of operation:			20.1

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:

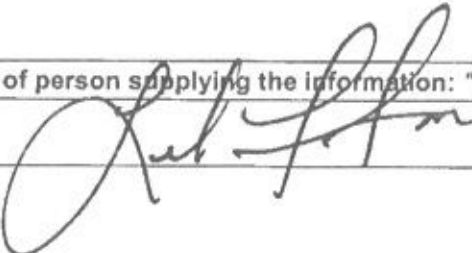
2/6/19

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
2018 ANNUAL REPORT FORM**

Reporting Period: January 1 through December 31, 2018
Report Due Date: February 15, 2019

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	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Reporting Requirements for Calendar 2018			
	Date of Reading		Meter Reading
First of 2018:	01/02/2018	First of 2018:	785
End of 2018:	01/03/2019	End of 2019:	801
Total annual hours for: Maintenance & Testing:			15.4
Hours of Emergency use:			0.6
Total Hours of operation:			16
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: 2/6/19
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



Ventura County
Air Pollution
Control District

**RESPONSIBLE OFFICIAL'S
CERTIFICATION FORM**

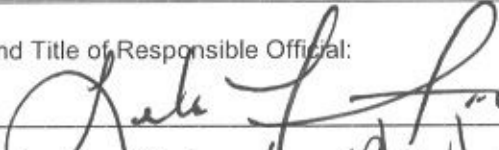
Ventura County APCD Rule 33.9 requires that "any document, including reports, schedule of compliance progress reports and compliance certifications, required by a Part 70 permit shall be certified by a responsible official." Therefore, this form shall be signed by the company's Responsible Official and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

Ed Swede
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>P-6 Oxand Plant Mgr</u></p>	<p>Date:</p> <p>2/16/19</p>
--	-----------------------------



The P&G Paper Product Co.

800 North Rice Avenue

Oxnard, CA 93030

www.pg.com

February 11, 2019

Michelle Wood
AQS, Inspector
Ventura County APCD
669 County Square Drive
Ventura, California 93003

Subject: Additional Documents in Support of Part 70 Compliance Certification for Report Year 2018

Mrs. Wood:

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, 2018 through December 31, 2018 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:

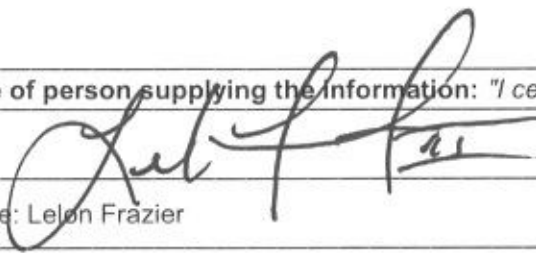
Mr. Lelon Frazier, Plant Manager; P&G
Mr. Kim Lim, HS&E Leader; P&G
Ms. Chris Cote, AQS; VCAPCD

**EMERGENCY DIESEL ENGINE
2018 ANNUAL REPORT FORM**

Reporting Period: January 1 through December 31, 2018

Report Due Date: February 15, 2019

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"/> X <input checked="" type="checkbox"/> No <input type="checkbox"/>
Reporting Requirements for Calendar 2018			
	Date of Reading		Meter Reading
First of 2018:	01/02/2018	First of 2018:	361.2
End of 2018:	01/03/2019	End of 2018:	387.1
Total annual hours for: Maintenance & Testing:			25.9
Hours of Emergency use:			0.0
Total Hours of operation:			25.9
Has the engine listed above exceeded the permit limit for maintenance and testing? YES If yes, please explain here or attach additional pages: See attachment			
Signature of person supplying the information: "I certify that the above information is correct."			
Signature:			Title: Plant Manager
Print Name: Lelon Frazier	Date:		2/6/19
Phone #: 805 485-8871 X 8924	Email: frazier.lf@pg.com		
Send report to: Ms. Chris Cote Ventura County Air Pollution Control District	Chris: (805) 645-1442 chrisc@vcapcd.org		
	Eric: (805) 645-1496 eric@vcapcd.org		
	Fax: (805) 645-1444		

669 County Square Drive, Second Floor

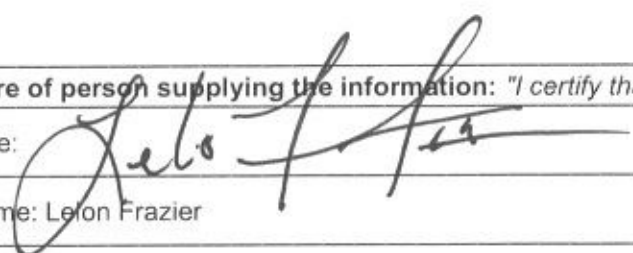
Ventura, CA 93003

Form#: 00015-50

**EMERGENCY DIESEL ENGINE
2018 ANNUAL REPORT FORM**

Reporting Period: January 1 through December 31, 2018
Report Due Date: February 15, 2019

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 checked="" type="checkbox"/> No
Reporting Requirements for Calendar 2018			
	Date of Reading		Meter Reading
First of 2018:	01/02/2018	First of 2018:	364.2
End of 2018:	01/03/2019	End of 2018:	389.2
Total annual hours for: Maintenance & Testing:			25
Hours of Emergency use:			0.0
Total Hours of operation:			25
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: Leion Frazier	Date:		2/6/19
Phone #: 805 485-8871 X 8924	Email: frazier.lf@pg.com		
Send report to: Ms. Chris Cote Ventura County Air Pollution Control District	Chris: (805) 645-1442 chrisc@vcapcd.org Eric: (805) 645-1496 eric@vcapcd.org		

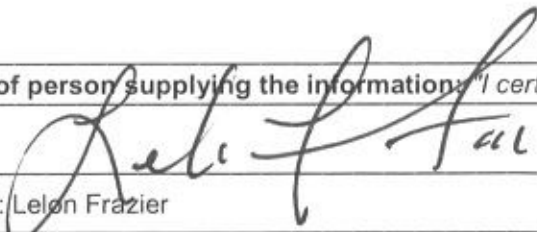
669 County Square Drive, Second Floor	Fax: (805) 645-1444
Ventura, CA 93003	Form#: 00015-50

**EMERGENCY DIESEL ENGINE
2018 ANNUAL REPORT FORM**

Reporting Period: January 1 through December 31, 2018

Report Due Date: February 15, 2019

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	<input type="checkbox"/>	No <input checked="" type="checkbox"/>
Reporting Requirements for Calendar 2017				
	Date of Reading		Meter Reading	
First of 2017:	01/02/2018	First of 2017:	731.2	
End of 2017:	01/03/2019	End of 2017:	751.3	
Total annual hours for: Maintenance & Testing:			18.5	
Hours of Emergency use:			1.6	
Total Hours of operation:			20.1	
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>"I certify that the above information is correct."</i>				
Signature:			Title: Plant Manager	
Print Name: Lelon Frazier			Date: 2/6/19	

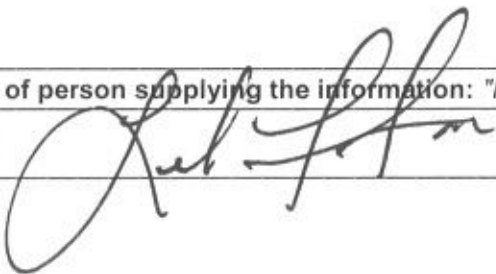
Phone #: 805 485-8871 X 8924	Email: frazier.lf@pg.com
Send report to: Ms. Chris Cote Ventura County Air Pollution Control District 669 County Square Drive, Second Floor Ventura, CA 93003	Chris: (805) 645-1442 chrisc@vcapcd.org Eric: (805) 645-1496 eric@vcapcd.org Fax: (805) 645-1444 Form#: 00015-50

**EMERGENCY DIESEL ENGINE
2018 ANNUAL REPORT FORM**

Reporting Period: January 1 through December 31, 2018

Report Due Date: February 15, 2019

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 <input type="checkbox"/> No <input type="checkbox"/> X <input checked="" type="checkbox"/>
Reporting Requirements for Calendar 2018		
	Date of Reading	Meter Reading
First of 2018:	01/02/2018	First of 2018: 785
End of 2018:	01/03/2019	End of 2019: 801
Total annual hours for: Maintenance & Testing:		15.4
Hours of Emergency use:		0.6
Total Hours of operation:		16
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: 2/6/19
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

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

B301	
Fuel Usage (MMSCF)	
Jan-18	2.01
Feb-18	9.80
Mar-18	0.34
Apr-18	0.00
May-18	0.10
Jun-18	0.01
Jul-18	0.49
Aug-18	0.55
Sep-18	0.46
Oct-18	0.20
Nov-18	0.79
Dec-18	1.49
12 Month Total	16.26

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 = 16.2569 * 1050

AHI = 17,070 MMBTU

Maximum Potential Heat Input (MPHI)

Capacity Factor (CF)

Rated Firing Capacity (RFC): 100 MMBTU/hr

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

Maximum Potential Operating Hours (MPOH): 8760 hrs

CF = AHI / MPMHI

MPHI = RFC * MPOH

MPHI = 876,000 MMBTU

CF = 0.019486 Ratio

30% of MPMHI (Maximum Allowable): 262800 MMBTU

% CF = 1.9% (%CF)

Maximum Allowable Rolling 12 month Fuel Usage: 250.29 MMSCF

Opacity Annual Formal Survey
Procter & Gamble Oxnard Plant

VCA/CD Part 70 Permit Attachment SO Compliance Document

Conducted On Date 9/28/18
Conducted By ERIC PALMER

Time 9:00AM - 11:00AM
Signature [Signature]

Visible Emissions Certification # NA
Must Recent Certification Date 9/18/18

Permit Emission Points
Drawing PG 3419810

Stack	Stack Height (ft)	Stack Dia (sq ft)	Emissions Unit	Emission Description	Stack Position	Visible Emissions other than Uncombined Water N - if there are no visible emissions for 2 minutes Y - if there are visible emissions > 20% or No. 1 Ringelmann for 2 min notes
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-331 Steam Boiler	Thermal Output with NOx, CO, SOx, PM, ROC	FGR closed during Stk (3hr) 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	3.63	Cogen 1/LM2500 Turbine	Thermal Output, NOx, CO, SOx, PM, ROC	Damper closed when 1X running	N
S-4E			W/W, 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 Diversion (PDF Stack)	Thermal Output with NOx, CO, SOx, PM, ROC, NH3	Normally Closed	N
S-7C			2X Vacuum Stack	PM	Open Vent	N
S-7D			2X Wet End (Former)	PM	Open Vent	N
S-7E			2X Broke Pulper Vent	PM	Open Vent	N
2			Fire Pump #2	CARB Fuel Combustion	Open vent	N
3			Fire Pump #3	CARB Fuel Combustion	Open vent	N
4			Fire Pump #4	CARB Fuel Combustion	Open vent	N
5			Fire Pump #5	CARB Fuel Combustion	Open vent	N

Any Other Visible Emissions? NO

Permit Emission Points
 Drawing - PG-3419820

Stack	Stack Hght (ft)	Stack Dia (sq ft)	Emissions Unit	Emission Description	Stack Position	Calculation
S-1	62	2.10	Washer Wet Lepper	PM	When Fan motor on	Permit - Fixed Operating Parameters
S-2	84	12.67	Cogen 2/LM6000 Turbine	Thermal Output with NOx, CO, SOx, PM, ROC, NH3	Damper closed when 2X is running	CEMS
S-3	27	4.40	B-301 Steam Boiler	Thermal Output with NOx, CO, SOx, PM, ROC	FGR closed during 50 (1hr) only - 100% Exhaust otherwise partial exhaust	Permit - Emission Factor for B-301
Stack S-4 is not a physical stack but represents the totals stacks from 1X process stacks 4A-4E						
				Thermal Output with NOx, CO, SOx, PM, ROC	Open when 1X running	CEMS
S-4A	56	4.72	1X PreDryer	HAF - Burners QB, Coke A + Burners		Permit - Emission Factors for HAF, Burners, and CI SOx, PM, ROC
S-4B	-	-	Furnace Cooling	Hot Air Release from shell cooling	Open	Inclusive of CI Emissions
S-4C	-	-	HRB	Thermal Output, NOx, CO, SOx, PM, ROC	Normally Closed	Inclusive of CI Emissions CEMS for NOx, CO
S-4D	50	9.63	Cogen 12/LM1500 Turbine	Thermal Output, NOx, CO, SOx, PM, ROC	Damper closed when 1X running	Permit Emission factors SOx, PM, ROC
S-4E	-	-	W/WL Breaker Pulper vent	PM	Open vent	Calculation included in Turbine and Furnace emission factors for PM
S-5	-	-	1X Scrubber	PM	When Fan motor on	Permit - Fixed Operating Parameters
S-6	-	-	2X Scrubber	PM	When Fan motor on	Permit - Fixed Operating Parameters
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)						
			2X PreDryer Exhaust (YHAF Stack)	Thermal Output with NOx, CO, SOx, PM, ROC, NH3	Normally Open	
S-7A	74	12.72		LM6000 - HAF + PD		(PD + HAF) 1X Emission Factor + Cogen 2 Emissions
S-7B	-	-	Exhaust Diversion (PDF Stack)	Thermal Output with NOx, CO, SOx, PM, ROC, NH3	Normally Closed	Inclusive of 2X emissions
S-7C	-	-	2X Vacuum Stack	PM	Open Vent	Calculation included in Turbine and Furnace emission factors for PM
S-7D	-	-	2X Wet End (Former)	PM	Open Vent	Calculation included in Turbine and Furnace emission factors for PM
S-7E	-	-	2X Breaker Pulper Vent	PM	Open Vent	Calculation included in Turbine and Furnace emission factors for PM
Fire Pumps						
			Fire Pump #2	CARB Fuel Combustion	Open vent	Report allocated fuel usage
			Fire Pump #3	CARB Fuel Combustion	Open vent	Report allocated fuel usage
			Fire Pump #4	CARB Fuel Combustion	Open vent	Report allocated fuel usage
			Fire Pump #5	CARB Fuel Combustion	Open vent	Report allocated fuel usage
ROC Emissions						
			Parts Cleaner - Pmlng		ROC	insignificant Activity
			Parts Cleaner - Cvtg		ROC	insignificant Activity
			Parts Cleaner - Truck Shop		ROC	insignificant Activity
			ink Room		ROC	Calculate from chemical usage/ Graphic Arts VOC Ides
			Manufacturing Additives		ROC	Calculated from chemical usage

Annual Title V Permitted Equipment Audit

Name: ERIC PALMER

Date: 9/28/18

Equipment	Location	Any Signs of Alteration?	Visible Nameplate Data	Comments
1 100 MMBTU/Hr Babcock & Wilcox Model FM 1854 NG / No. 2 FO Steam Boiler w/ FGR and loNOx Coen Burner, Model 675/DAF-32	Utilities Building - East Wall. <i>Check outside then inside</i>	NO	YES	
2 Emergency Engines	#1 - North of Cooling Towers #2 - East of Treated Water Tank #3 East of Fresh Water Tank	#1 NA #2 NO #3 NO	#1 NA EMR 9/28/18 #2 YES #3 YES	#1 NA #2 #3
3 46.77 MW GE NG Cogen Turbine w/ Steam Inj & SCR w/ NH3 Inj - LM6000	Energy - Turbine Hall at Cogen II	NO	YES	
4 2X - Dryer Furnace w/ (1) 70 MMBTU/Hr NG Coen Co. LoNOx Burner	Outside 2X	NO	YES	
5 2X - Yankee Trim Furnace w/ (1) 40 MMBTU/Hr NG Coen Co. LoNOx Burner		NO	YES	
6 20.1 MW GE NG/ No.2 FO Cogen Turbine w/ water Inj. LM-2500	Between 1X and Papermaking Rebuild Shop	NO	YES	
7 1X - 150 MMBTU/Hr NG No. 2 FO Hot Air Furnace		NO	YES	
8 1X - Yankee Drying Hood w/ (2) 14 MMBTU/Hr / LPG AER Corp Burners	Through Blade shop at top of 1X	NO	YES	

Annual Title V Permitted Equipment Audit

Name: _____

Date: _____

	Equipment	Location	Any Signs of Alteration?	Visible Nameplate Data	Comments
9	1X Scrubber Stack	Top of roof - S-5	NO	YES	
10	2X Scrubber Stack	Top of roof - S-1	NO	YES	
11	2X - Dryer Exhaust Stack	Stack S-7A (square stack)	NO	YES	
12	2X - Vacuum Exhaust Stack	Stack S-7C at top of Vacuum Train	NO	YES	
13	2X - Wet End Exhaust Stack <i>also known as Former Exhaust Stack</i>	Stack S-7D	NO	YES	
14	WWL Broke Pulper Vent	Stack S-4E (Safety watch - do not cross red faded line)	NO	YES	
15	1X - Wet End Exhaust Stack	Stack S-4D near Cooling Tower	NO	YES	
16	1X - PreDryer Exhaust Stack (Big)	Stack S-4A	NO	YES	
17	1X - PreDryer Exhaust Stack (little)	Stack S-4B	NO	YES	

Annual Title V Permitted Equipment Audit

Name: _____

Date: _____

	Equipment	Location	Any Signs of Alteration?	Visible Nameplate Data	Comments
18	Outside by Stock Prep		NO	YES	
19	WWL Venturi Scrubber, Anderson 200 Series, Model No. VES-113 Cyclonic		NO	YES	

Annual Title V Permitted Equipment Audit

Name: _____

Date: _____

Equipment	Location	Any Signs of Alteration?	Visible Nameplate Data	Comments
Ground Level by 90 day HW storage				
20 1X - Dry End Venturi Scrubber, Anderson 2000 Series, Model No. WAF170	North Wall of Papermachine room building facing 90-Day Accumulation Area. Stack S-5	NO	YES	
21 2X Dry End Venturi Scrubber Anderson 2000 Series Model No. WAF113	Stack S-1	NO	YES	
22 KRT/TT Converting Line Room	Ensure that all roof vents are closed.	NO	YES	
23 Additive and Ink Applications	PVA Glue Room, KX1/2/3, Ink Room	NO	YES	
24 Cold Cleaners w/ < 1 m ² surface Area	Papermaking Rebuild Shop, Converting Shop, Logistics Shop	NO	YES	
25 Emergency Engines	#4&5 - South Property Line in Shed next to Tank @ Outside warehouse	NO	YES	
26 1X - Vacuum Exhaust Stack	Stack S-4C	NO	YES	

PO00015PC1.1 RY 2018 Monthly Throughput

Month	PMKG	CVTG	Total Facility	Cumbustion Emissions					
	ROC	ROC	ROC	ROC	NOx	PM	SOx	CO	NH3
	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)
Jan-17	1.93	0.28	3.33	1.12	8.81	1.38	0.14	13.79	0.51
Feb-17	1.83	0.33	3.21	1.05	8.77	1.32	0.12	12.94	0.62
Mar-17	1.82	0.36	3.40	1.21	8.94	1.50	0.15	12.44	0.37
Apr-17	2.01	0.29	3.33	1.03	6.92	1.26	0.13	9.85	0.37
May-17	2.06	0.40	3.63	1.18	8.70	1.44	0.15	11.25	0.34
Jun-17	2.28	0.57	4.04	1.18	8.55	1.45	0.15	10.62	0.32
Jul-17	2.23	0.55	4.01	1.23	8.84	1.52	0.15	10.40	0.31
Aug-17	2.18	2.12	5.53	1.23	9.63	1.51	0.15	11.19	0.31
Sep-17	2.25	0.34	3.77	1.18	9.47	1.46	0.14	10.18	0.31
Oct-17	2.21	0.29	3.72	1.22	8.65	1.50	0.15	11.97	0.34
Nov-17	2.13	0.29	3.57	1.16	8.16	1.42	0.14	12.20	0.35
Dec-17	2.18	0.33	3.72	1.21	9.34	1.49	0.15	12.51	0.36
<i>Current Actual in Tons versus Permit Limit</i>									
12 Mo Tons	25.11	6.16	45.26	13.99	104.79	17.26	1.74	139.34	4.52
				ROC	NOx	PM	SOx	CO	NH3
			Permit Limits ->	16.82	132.88	68.3	2.03	284.93	54.19