



May 14, 2020

Mr. Keith Macias  
Compliance Manager  
Ventura County APCD  
669 County Square Drive  
Ventura, CA 93003

Re: New-Indy Oxnard, LLC  
2019-2020 Annual Title V Certification (PTO 0157)

Dear Mr. Macias:

Enclosed, please find a binder containing the 2019-2020 Annual Title V Certification Forms and related documentation for New-Indy Oxnard facility. The supporting documentation is included in Section 5.

If you have any questions, please feel free to contact Robyn Lebrilla at 805.271.7284.

Sincerely,

Rudy Rehbein  
Mill Manager

CC: Gerardo Rios  
Chief Permit Office (AIR-3)  
Office of Air Division, EPA Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

enc: 2019-2020 Annual Title V Compliance Certification Binder

**NEW INDY OXNARD, LLC**

5936 PERKINS ROAD • OXNARD, CALIFORNIA 93033 • WWW.NEWINDYCONTAINERBOARD.COM  
PHONE (805) 986-3881 • FAX (805) 488-5186





## **2019-2020 TITLE V COMPLIANCE CERTIFICATION**

**PERMIT TO OPERATE 0157**

May 14, 2020

**Prepared for:**      **New-Indy Oxnard, LLC**  
5936 Perkins Road  
Oxnard, California 93033

**Prepared by:**      **Sespe Consulting, Inc.**  
374 Poli Street, Suite 200  
Ventura, California 93001

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New-Indy Oxnard, LLC  
May 14, 2020

- Section 1      Signature Cover Form  
Section 2      Deviation Summary Forms  
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Section 4      Permit Attachment Forms

Requirement ID	Description
6.a. 74.15N1-0157	Boilers, Steam Generators, and Process Heaters – NO <sub>x</sub> and CO limits for units with heat input greater than 9,000 MMBtu/yr
6.b. 103N5-0157	Stack Monitoring
6.c. STRMLN157- NO <sub>x</sub> , CO, NH <sub>3</sub>	Gas Turbine Based Cogeneration Unit; NO <sub>x</sub> , CO, and NH <sub>3</sub> Applicable Requirements – NO <sub>x</sub> Streamlined
6.d. STRMLN157-SO <sub>x</sub>	Gas Turbine Based Cogeneration Unit; SO <sub>x</sub> Applicable Requirements – Streamlined
6.e. 74.9N7	Stationary Internal Combustion Engines – Exemption for Emergency Engines
6.f. 40CFR63ZZZN9	Reciprocating Internal Combustion Engines – Existing Spark Ignition Engines
7.a. PO0157PC1	General Recordkeeping Requirements
7.b. PO0157PC1	Solvent Cleaning Additional Requirements
7.c. PO0157PC1	Stationary Gas Turbine Path Cleaning Solvent Use
7.d. PO0157PC2	Turbine NO <sub>x</sub> and CO Emissions Limits
7.e. PO0157PC2	Turbine and Duct Burner Natural Gas Only Requirement
7.f. PO0157PC2	Nebraska Boiler Flue Gas Recirculation Requirements
7.g. PO0157PC2	Nebraska Boiler NO <sub>x</sub> and Oxygen Continuous Monitoring Requirements
7.h. PO0157PC2	Recordkeeping Requirements for the Maxon Duct Burner
8.a. Rule 50	Opacity
8.b. Rule 54.B.1	Sulfur Compounds – SO <sub>x</sub> at Point of Discharge
8.c. Rule 54.B.2	Sulfur Compounds – SO <sub>x</sub> at or Beyond Property Line
8.d. Rule 55	Fugitive Dust
8.e. Rule 57.1	Particulate Matter Emissions From Fuel Burning Equipment
8.f. Rule 64.B.1	Sulfur Content of Fuels – Gaseous Fuel Requirements
8.g. Rule 74.6	Surface Cleaning and Degreasing
8.h. Rule 74.11.1	Large Water Heaters and Small Boilers

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Requirement ID	Description
8.i. Rule 74.22	Natural Gas-Fired, Fan Type Central Furnaces
9.a. Rule 74.1	Abrasive Blasting
9.b. Rule 74.2	Architectural Coatings
9.c. 40CFR61.M	40 CFR 61 Subpart M – Asbestos NESHAPS
10.a. Part 70 General	Part 70 Permit General Conditions
10.b. PO General	Permit to Operate General Conditions
11.a. 40CFR68RMP-157	Accidental Release Prevention and Risk Management Plans
11.b. 40CFR82	40 CFR 82 – Protection of Stratospheric Ozone
11c.1. SHIELD-D, Da, Db, Dc)	Permit Shield – 40 CFR Part 60, Subparts D, Da, Db, and Dc.
11c.2. SHIELD-60JJJJ	Permit Shield – 40 CFR Part 60, Subpart JJJJ
11c.3. SHIELD-60KKKK	Permit Shield – 40 CFR Part 60, Subpart KKKK
11c.4. SHIELD-63YYYY	Permit Shield – 40 CFR Part 63, Subparts YYYY
11c.5. SHIELD-63JJJJJ	Permit Shield – 40 CFR 63, Subpart JJJJJ
11.c.6. SHIELD-40CFR72-78	Permit Shield – 40 CFR Parts 72 – 78

Section 5 Supporting Records

Requirement ID	Description
Deviation Summary Form	Supporting Documentation.
Source Test Summary Form	Supporting Documentation.
6.a. 74.15N1-0157 & PO00157PC2	Nebraska Boiler fuel use, hours of operation, and tune-up document.
6.e. 74.9N7	Emergency engine records.
7.c. PO0157PC2	Cogeneration unit and duct burners fuel use and emissions.
8.a. Rule 50	Quarterly opacity observations.
8.c. Rule 54.B.2	District memo dated May 23, 1996.
8.d. Rule 57.1	District memo dated Dec. 3, 1997.

**2019 - 2020  
Annual Title V Compliance Certification  
New-Indy Oxnard, LLC  
May 14, 2020**

**Section 1      Signature Cover Form**







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:

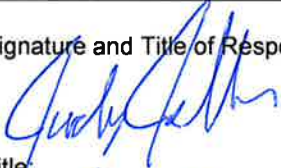
Mr. Gerardo Rios, Chief  
Permits Office (AIR-3)  
Office of Air Division  
EPA Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

**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>Mill Manager</p>	<p>Date:</p> <p>5/14/2020</p>
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<p>Time Period Covered by Compliance Certification</p> <p><u>04</u> / <u>01</u> / <u>19</u> (MM/DD/YY) to <u>03</u> / <u>31</u> / <u>20</u> (MM/DD/YY)</p>
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**2019 - 2020  
Annual Title V Compliance Certification  
New-Indy Oxnard, LLC  
May 14, 2020**

**Section 2      Deviation Summary Forms**



2019-2020  
Annual Title V Compliance Certification  
New-Indy Oxnard, LLC  
May 14, 2020

**Deviation Summary Table**

Letter Date	Breakdown/Event	Comment
5/8/2019	CEMS – Invalid Data	During preventative maintenance the initial calibration of new O <sub>2</sub> probe drifted more than 5%. Unit recalibrated.
5/24/2019	Pi Data Loss	During scheduled maintenance moving virtual servers from separate hosts to a single host resulted in dropped network connections. Corrupted network card software reinstalled.
6/17/2019	CEMS – Sample Handling Failure	Stack gas flow restricted from meter. Adjusted controls and sample line. Installed new stack and calibration gas control valves.
7/19/2019	CEMS – Calibration Failure	Power disruption affected PLC microprocessor causing loss of calibration parameters. Manual calibration and direct parameter input to PLC by vendor technician.
8/13/2019	Cogen Excess NOx Emissions	Electrical control fluctuations disrupted ammonia dilution fan operating causing the ammonia automatic control valve to close and resulting in excess NOx emissions. Re-established fan and control valve operation.
11/14/2019	CEMS – Invalid Data	Faulty equipment installed during CEMS preventative maintenance caused poor gas flow resulting in invalid data. Faulty equipment was replaced.
12/31/2019	CEMS – Invalid Inlet NOx Data	Inlet NOx chemiluminescence detector damaged during power surge and replacement required configuration by vendor technician.
12/31/2019	CEMS – Invalid O <sub>2</sub> Data	Corrupted calibration software caused invalid O <sub>2</sub> data. Reinstalled software and recalibrated unit.
1/16/2020	CEMS – Invalid Inlet NOx Data	Damaged hose causing sample pump failure resulting in invalid NOx data. Replaced filter, hose, and pump.
3/19/2020	CEMS – Data Loss	Uninterruptable power supply (UPS) lost power causing CEMS to stop operating resulting in data loss. Power restored and UPS secured to prevent recurrence.
3/30/2020	CEMS – Data Loss	Inadvertent change of month in the distributed control system (DCS) caused Pi to error because it could not record data in the future. Correct month entered in DCS.



## ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 04 / 01 / 19 (MM/DD/YY) to 03 / 31 / 20 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: STRMLN157-NOx, CO, NH3 - rev241</p>	<p>B. Equipment description: CEMS - Invalid Data</p>	<p>C. Deviation Period: Date &amp; Time          Begin: <u>5/2/2019 10:31AM</u>          End: <u>5/2/2019, 1:14PM</u>          When Discovered: Date &amp; Time  <u>5/2/2019, 12:30PM</u></p>
<p>D. Parameters monitored: Oxygen emissions</p>	<p>E. Limit: Continuous monitoring.</p>	<p>F. Actual: Intermittent due to preventative maintenance.</p>
<p>G. Probable Cause of Deviation: New probe drifted after initial calibration.</p>		<p>H. Corrective actions taken: Recalibrated probe.</p>

<p>A. Attachment # or Permit Condition #: STRMLN157-NOx, CO, NH3 - rev241</p>	<p>B. Equipment description: Pi Data Loss</p>	<p>C. Deviation Period: Date &amp; Time          Begin: <u>5/21/2019, 8:51AM</u>          End: <u>5/22/2019, 7:15AM</u>          When Discovered: Date &amp; Time  <u>5/21/2019, 11:16AM</u></p>
<p>D. Parameters monitored: All Parameters</p>	<p>E. Limit: Continuous monitoring.</p>	<p>F. Actual: Intermittent</p>
<p>G. Probable Cause of Deviation: Network interface card software driver corruption.</p>		<p>H. Corrective actions taken: Reinstalled driver.</p>

<p>A. Attachment # or Permit Condition #: STRMLN157-NOx, CO, NH3 - rev241</p>	<p>B. Equipment description: CEMS - Sample Handling Failure</p>	<p>C. Deviation Period: Date &amp; Time          Begin: <u>6/13/2019, 8:10AM</u>          End: <u>6/13/2019, 9:57AM</u>          When Discovered: Date &amp; Time  <u>6/13/2019, 8:10AM</u></p>
<p>D. Parameters monitored: All Parameters</p>	<p>E. Limit: Continuous monitoring.</p>	<p>F. Actual: Intermittent</p>
<p>G. Probable Cause of Deviation: Sample train not transmitting sufficient stack gas to CEMS</p>		<p>H. Corrective actions taken: Stack and calibration gas control valves replaced.</p>



## ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 04 / 01 / 19 (MM/DD/YY) to 03 / 31 / 20 (MM/DD/YY)

<b>A. Attachment # or Permit Condition #:</b> STRMLN157-NOx, CO, NH3-rev241	<b>B. Equipment description:</b> CEMS - Calibration Failure	<b>C. Deviation Period: Date &amp; Time</b> Begin: <u>7/15/19, 9:04 PM</u> End: <u>7/16/19, 3:24 PM</u> When Discovered: Date & Time <u>7/15/19, 9:04 PM</u>
<b>D. Parameters monitored:</b> All Parameters	<b>E. Limit:</b> Continuous monitoring	<b>F. Actual:</b> Intermittent due to damage from power disruption.
<b>G. Probable Cause of Deviation:</b> PLC microprocessor calibration parameters corrupted.		<b>H. Corrective actions taken:</b> Manual calibration and direct programming of parameters to PLC microprocessor by vendor technician.

<b>A. Attachment # or Permit Condition #:</b> STRMLN157-NOx, CO, NH3-rev241	<b>B. Equipment description:</b> CEMS - Excess NOx Emissions	<b>C. Deviation Period: Date &amp; Time</b> Begin: <u>8/12/19, 1:55AM</u> End: <u>8/12/19, 2:45AM</u> When Discovered: Date & Time <u>8/12/19, 1:55AM</u>
<b>D. Parameters monitored:</b> NOx	<b>E. Limit:</b> 12 ppmvd at 15%O2	<b>F. Actual:</b> 17.17 lb excess over 50 minute period.
<b>G. Probable Cause of Deviation:</b> Electric fluctuations stopped ammonia dilution fan causing ammonia control valve to close.		<b>H. Corrective actions taken:</b> Reestablished power to fan and opened ammonia control valve.

<b>A. Attachment # or Permit Condition #:</b> STRMLN157-NOx, CO, NH3-rev241	<b>B. Equipment description:</b> CEMS - Invalid Data	<b>C. Deviation Period: Date &amp; Time</b> Begin: <u>11/12/19, 1:26PM</u> End: <u>11/12/19, 5:28PM</u> When Discovered: Date & Time <u>11/13/19, 9:00AM</u>
<b>D. Parameters monitored:</b> All Parameters	<b>E. Limit:</b> Continuous Monitoring	<b>F. Actual:</b> Intermittent due to poor stack gas flow.
<b>G. Probable Cause of Deviation:</b> Replacement ammonia scrubber installed during preventative maintenance not working properly.		<b>H. Corrective actions taken:</b> Replaced ammonia scrubber.



## ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 04 / 01 / 19 (MM/DD/YY) to 03 / 31 / 20 (MM/DD/YY)

<b>A. Attachment # or Permit Condition #:</b> STRMLN157-NOx, CO, NH3-rev241	<b>B. Equipment description:</b> CEMS - Invalid Inlet NOx Data	<b>C. Deviation Period: Date &amp; Time</b> Begin: <u>12/25/19, 3:08PM</u> End: <u>12/27/19, 4:40PM</u> When Discovered: Date & Time <u>12/25/19, 3:08PM</u>
<b>D. Parameters monitored:</b> NOx	<b>E. Limit:</b> Continuous monitoring	<b>F. Actual:</b> Intermittent
<b>G. Probable Cause of Deviation:</b> Inlet NOx chemiluminescence detector damaged during power surge.		<b>H. Corrective actions taken:</b> Detector replaced by vendor technician.

<b>A. Attachment # or Permit Condition #:</b> STRMLN157-NOx, CO, NH3-rev241	<b>B. Equipment description:</b> CEMS - Invalid Oxygen Data	<b>C. Deviation Period: Date &amp; Time</b> Begin: <u>12/27/19, 4:40PM</u> End: <u>12/28/19, 10:25AM</u> When Discovered: Date & Time <u>12/27/19, 4:40PM</u>
<b>D. Parameters monitored:</b> Oxygen	<b>E. Limit:</b> Continuous monitoring	<b>F. Actual:</b> Intermittent due to electric control fluctuations.
<b>G. Probable Cause of Deviation:</b> Electric control fluctuations caused corruption of calibration program.		<b>H. Corrective actions taken:</b> Reinstalled calibration program.

<b>A. Attachment # or Permit Condition #:</b> STRMLN157-NOx, CO, NH3-rev241	<b>B. Equipment description:</b> CEMS - Invalid Inlet NOx Data	<b>C. Deviation Period: Date &amp; Time</b> Begin: <u>1/14/20, 8:43AM</u> End: <u>1/14/20, 3:43PM</u> When Discovered: Date & Time <u>1/14/20, 8:43AM</u>
<b>D. Parameters monitored:</b> NOx	<b>E. Limit:</b> Continuous monitoring	<b>F. Actual:</b> Intermittent
<b>G. Probable Cause of Deviation:</b> Damaged hose caused sample pump failure.		<b>H. Corrective actions taken:</b> Replaced filter, pump and tubing.





## ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 04 / 01 / 19 (MM/DD/YY) to 03 / 31 / 20 (MM/DD/YY)

<b>A. Attachment # or Permit Condition #:</b> STRMLN157-NOx, CO, NH3-rev241	<b>B. Equipment description:</b> CEMS - Data Loss	<b>C. Deviation Period: Date &amp; Time</b> Begin: <u>3/16/20, 3:30PM</u> End: <u>3/16/20, 4:13PM</u> When Discovered: Date & Time <u>3/16/20, 3:30PM</u>
<b>D. Parameters monitored:</b> All	<b>E. Limit:</b> Continuous monitoring	<b>F. Actual:</b> Intermittent
<b>G. Probable Cause of Deviation:</b> Uninterruptable power supply (UPS) lost power causing CEMS to stop operating resulting in data loss.		<b>H. Corrective actions taken:</b> Power restored and UPS secured to prevent recurrence.

<b>A. Attachment # or Permit Condition #:</b> STRMLN157-NOx, CO, NH3-rev241	<b>B. Equipment description:</b> CEMS - Pi Data Loss	<b>C. Deviation Period: Date &amp; Time</b> Begin: <u>3/26/20, 8:18AM</u> End: <u>3/26/19, 11:51AM</u> When Discovered: Date & Time <u>3/26/20, 10:40AM</u>
<b>D. Parameters monitored:</b> All	<b>E. Limit:</b> Continuous recording	<b>F. Actual:</b> Intermittent
<b>G. Probable Cause of Deviation:</b> Inadvertent change of month to a future month in the distributed control system (DCS) caused Pi to error.		<b>H. Corrective actions taken:</b> Correct month entered in DCS.

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



**2019 - 2020  
Annual Title V Compliance Certification  
New-Indy Oxnard, LLC  
May 14, 2020**

**Section 3      Source Test Summary Forms**





Ventura County  
Air Pollution  
Control District

## ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 04 / 01 / 19 (MM/DD/YY) to 03 / 31 / 20 (MM/DD/YY)

A. Emission Unit Description: Gas turbine based cogeneration unit			B. Pollutant: NOx
C. Measured Emission Rate: 10.4 ppm @ 15% O2	D. Limited Emission Rate: 12 ppm @ 15% O2	E. Specific Source Test or Monitoring Record Citation: AirX Source Test	F. Test Date: 3/3/2020

A. Emission Unit Description: Gas turbine based cogeneration unit			B. Pollutant: CO
C. Measured Emission Rate: 14.09 lb/hr	D. Limited Emission Rate: 59.65 lbs/hr	E. Specific Source Test or Monitoring Record Citation: AirX Source Test	F. Test Date: 3/3/2020

A. Emission Unit Description: Gas turbine based cogeneration unit & Nebraska Boiler			B. Pollutant: NOx
C. Measured Emission Rate: 44.42 tons/yr by CEMS.	D. Limited Emission Rate: 50 tons/yr	E. Specific Source Test or Monitoring Record Citation: CEMS data	F. Test Date: 3/3/2020

A. Emission Unit Description: Gas turbine based cogeneration unit & Nebraska Boiler			B. Pollutant: CO
C. Measured Emission Rate: 92.62 tons/yr by CEMS & calc.	D. Limited Emission Rate: 97.66 tons/yr	E. Specific Source Test or Monitoring Record Citation: CEMS data (cogen) Fuel use (boiler)	F. Test Date: 3/3/2020

A. Emission Unit Description: Gas turbine based cogeneration unit			B. Pollutant: NH3
C. Measured Emission Rate: 1.4 @ 15% O2	D. Limited Emission Rate: 20 @ 15% O2	E. Specific Source Test or Monitoring Record Citation: AirX Source Test	F. Test Date: 3/3/2020



Ventura County  
Air Pollution  
Control District

## ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 04 / 01 / 19 (MM/DD/YY) to 03 / 31 / 20 (MM/DD/YY)

A. Emission Unit Description: Nebraska Boiler (RATA)			B. Pollutant: NOx
C. Measured Emission Rate: Relative Accuracy 8.6%	D. Limited Emission Rate: 20%	E. Specific Source Test or Monitoring Record Citation: AIRx Testing Services, Inc.	F. Test Date: 11/06/18

A. Emission Unit Description: Nebraska Boiler (RATA)			B. Pollutant: O2
C. Measured Emission Rate: Relative Accuracy 16.5%	D. Limited Emission Rate: 20%	E. Specific Source Test or Monitoring Record Citation: AIRx Testing Services, Inc.	F. Test Date: 11/06/18

A. Emission Unit Description: Nebraska Boiler compliance emissions testing			B. Pollutant: NOx
C. Measured Emission Rate: 29.9 ppmv @ 3% O2	D. Limited Emission Rate: 40 ppm @ 3% O2	E. Specific Source Test or Monitoring Record Citation: AirX Testing Services, Inc.	F. Test Date: 10/17/2018

A. Emission Unit Description: Nebraska Boiler compliance emissions testing			B. Pollutant: CO
C. Measured Emission Rate: 0.2 ppmv @ 3% O2	D. Limited Emission Rate: 400 ppm @ 3% O2	E. Specific Source Test or Monitoring Record Citation: AirX Testing Services, Inc.	F. Test Date: 10/17/2018

A. Emission Unit Description: Nebraska Boiler (initial compliance test - mid fire)			B. Pollutant: NOx
C. Measured Emission Rate: 31.95 ppm @ 3% O2	D. Limited Emission Rate: 40 ppm @ 3% O2	E. Specific Source Test or Monitoring Record Citation: Energy Environmental Solutions, Inc.	F. Test Date: 10/20/16



Ventura County  
Air Pollution  
Control District

## ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 04 / 01 / 18 (MM/DD/YY) to 03 / 31 / 19 (MM/DD/YY)

A. Emission Unit Description: Nebraska Boiler (initial compliance test - mid fire)			B. Pollutant: CO
C. Measured Emission Rate: 1.47 ppm @ 3% O2	D. Limited Emission Rate: 400 ppm @ 3% O2	E. Specific Source Test or Monitoring Record Citation: Energy Environmental Solutions, Inc.	F. Test Date: 10/20/16

A. Emission Unit Description: Nebraska Boiler (initial RATA)			B. Pollutant: NOx
C. Measured Emission Rate: Relative Accuracy 9.4%	D. Limited Emission Rate: 20%	E. Specific Source Test or Monitoring Record Citation: AirX Testing Services, Inc.	F. Test Date: 11/1/16

A. Emission Unit Description: Nebraska Boiler (initial RATA)			B. Pollutant: O2
C. Measured Emission Rate: Relative Accuracy 16.6%	D. Limited Emission Rate: 20%	E. Specific Source Test or Monitoring Record Citation: AirX Testing Services, Inc.	F. Test Date: 11/1/16

A. Emission Unit Description: Maxon Duct Burner			B. Pollutant: NOx
C. Measured Emission Rate: 0.92 tons/year	D. Limited Emission Rate: 1.90 tons/year	E. Specific Source Test or Monitoring Record Citation: West Coast Environmental	F. Test Date: 8/17/95

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





**2019 - 2020  
Annual Title V Compliance Certification  
New-Indy Oxnard, LLC  
May 14, 2020**

**Section 4      Permit Attachment Forms**





Ventura County  
Air Pollution  
Control District

## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 19 (MM/DD/YY) to 03 / 31 / 20 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <u>74.15N1-00157</u></p>	<p>D. Frequency of monitoring:  Continuous</p>
<p>B. Description: Pursuant to Rule 74.15.B.1, the boiler shall be source tested not less than once every 24 months for NOx, CO, and Stack Gas Oxygen using ARB Method 100.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  n/a</p>
<p>C. Method of monitoring: CEMS and biennial source test. Source test completed on 10/17/2018 and 11/06/2018.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>            G. Compliance Status? (C or I): <u>I</u>            H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>Y</u>            *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>6.b.103N5-0157</u></p>	<p>D. Frequency of monitoring:  Continuous</p>
<p>B. Description: Rule 103, Stack Monitoring - Nebraska Boiler</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  n/a</p>
<p>C. Method of monitoring: Fuel meter and CEMS. Maximum rolling 12-month capacity factor is 4.304% and unit remains exempt from 103.A.2.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>            G. Compliance Status? (C or I): <u>C</u>            H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>            *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>6.c.STRMLN157-NOx, CO, NH3</u></p>	<p>D. Frequency of monitoring:  Continuous</p>
<p>B. Description: Gas Turbine Based Cogeneration Unit; NOx, CO, NH3 Applicable Requirements - NOx Streamline</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable EPA Method 20, ARB Method 100 BAAQMD Method ST-1B</p>
<p>C. Method of monitoring: Annual source test and CEMS for NOx, CO, O2, NH3, and control system operating parameters.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>            G. Compliance Status? (C or I): <u>I</u>            H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>Y</u>            *If yes, attach Deviation Summary Form</p>



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 19 (MM/DD/YY) to 03 / 31 / 20 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <u>6.d. STRMLN157-SOx</u></p>	<p>D. Frequency of monitoring:  Continuous</p>
<p>B. Description: Gas Turbine Based Cogeneration Unit; SOx Applicable Requirements - Streamlined</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable EPA Method 6, 6A, 6C, 15, 16A, 16B, or SCAQMD 307-94</p>
<p>C. Method of monitoring:  Facility burns PUC quality gas only. Annual source test would be required if non-PUC quality gas were used.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p><small>*If yes, attach Deviation Summary Form</small></p>

<p>A. Attachment # or Permit Condition #: <u>6.e. 74.9N7</u></p>	<p>D. Frequency of monitoring:  Continuous</p>
<p>B. Description:  Stationary Internal Combustion Engines - Exemption for Emergency Engines</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  n/a</p>
<p>C. Method of monitoring:  Non-resettable hour meter. Log operating hours and reasons for operation.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p><small>*If yes, attach Deviation Summary Form</small></p>

<p>A. Attachment # or Permit Condition #: <u>6.f. 40CFR63ZZZZN9</u></p>	<p>D. Frequency of monitoring:  Continuous</p>
<p>B. Description:  Reciprocating Internal Combustion Engine - Existing Emergency Spark Ignited Engines</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  n/a</p>
<p>C. Method of monitoring:  Non-resettable hour meter. Log maintenance activities including oil change and spark plug/belt/hose inspection/changes.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p><small>*If yes, attach Deviation Summary Form</small></p>



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<p>A. Attachment # or Permit Condition #: <b>7.a. PO00157PC1</b></p>	<p>D. Frequency of monitoring: <b>Continuous</b></p>
<p>B. Description: <b>General Recordkeeping Requirements</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable <b>n/a</b></p>
<p>C. Method of monitoring: <b>Monthly records of throughput and consumption.</b></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>  G. Compliance Status? (C or I): <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <b>7.b. PO00157PC1</b></p>	<p>D. Frequency of monitoring: <b>Continuous</b></p>
<p>B. Description: <b>Solvent Cleaning Additional Requirements</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable <b>n/a</b></p>
<p>C. Method of monitoring: <b>Monthly records of solvent usage. Maintain Safety Data Sheets showing VOC and HHC content of non-exempt solvents used.</b></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>  G. Compliance Status? (C or I): <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <b>7.c. PO00157PC1</b></p>	<p>D. Frequency of monitoring: <b>continuous</b></p>
<p>B. Description: <b>Stationary Gas Turbine Gas Path Cleaning Solvent Use</b></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable <b>n/a</b></p>
<p>C. Method of monitoring: <b>Maintain solvent information.</b></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>  G. Compliance Status? (C or I): <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: <u>7.d. PO00157PC2</u></p>	<p>D. Frequency of monitoring: <u>Continuous</u></p>
<p>B. Description:  <u>Turbine NOx and CO Emissions Limits</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <u>n/a</u></p>
<p>C. Method of monitoring: <u>Monthly calculations based upon NOx and CO hourly emissions from CEMS.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>  G. Compliance Status? (C or I): <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>7.e. PO00157PC2</u></p>	<p>D. Frequency of monitoring: <u>Continuous</u></p>
<p>B. Description:  <u>Turbine and Duct Burner Natural Gas Only Requirement</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <u>n/a</u></p>
<p>C. Method of monitoring: <u>Fueled by natural gas only.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>  G. Compliance Status? (C or I): <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>7.f. PO00157PC2</u></p>	<p>D. Frequency of monitoring: <u>Continuous</u></p>
<p>B. Description:  <u>Nebraska Boiler Flue Gas Recirculation (FGR) Requirements</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <u>n/a</u></p>
<p>C. Method of monitoring:  <u>Record FGR variable frequency drive (VFD) percentage and speed (Hz) daily when unit is in operation.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>  G. Compliance Status? (C or I): <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: <u>7.g. PO00157PC2</u></p>	<p>D. Frequency of monitoring:  <u>Continuous</u></p>
<p>B. Description:  <u>Nebraska Boiler NOx and Oxygen Continuous Monitoring Requirements.</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <u>n/a</u></p>
<p>C. Method of monitoring: <u>CEMS for NOx and oxygen. Daily zero and span drift checks when boiler is in operation.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>  G. Compliance Status? (C or I): <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>7.h. PO00157PC2</u></p>	<p>D. Frequency of monitoring:  <u>Continuous, Daily</u></p>
<p>B. Description:  <u>Recordkeeping for Maxon duct burner.</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <u>n/a</u></p>
<p>C. Method of monitoring: <u>Continuously record time and duration of burner operation and fuel consumption rate.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>  G. Compliance Status? (C or I): <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>8.a. Rule 50</u></p>	<p>D. Frequency of monitoring:  <u>Quarterly</u></p>
<p>B. Description:  <u>Opacity</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <u>EPA Method 22</u></p>
<p>C. Method of monitoring: <u>Stack opacity routinely observed. Observations on 6/18/19, 9/6/19, 12/19/19, and 2/26/20 are formally documented.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u>  G. Compliance Status? (C or I): <u>C</u>  H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: 8.b. Rule 54.B.1</p>	<p>D. Frequency of monitoring:  Continuous</p>
<p>B. Description:  Sulfur Compounds - SOx at Point of Discharge</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  n/a</p>
<p>C. Method of monitoring: Follow Rule 64 monitoring requirements. Compliance with Rule 64 ensures compliance with this rule based on District analysis.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 8.c. Rule 54.B.2</p>	<p>D. Frequency of monitoring:  Continuous</p>
<p>B. Description:  Sulfur Compounds - SOx at or Beyond Property Line</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  n/a</p>
<p>C. Method of monitoring: Compliance by use of PUC quality natural gas as discussed in District memo (5/23/96)</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 8.d. Rule 55</p>	<p>D. Frequency of monitoring:  Continuous</p>
<p>B. Description:  Fugitive Dust</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  EPA Methods 9 and 22</p>
<p>C. Method of monitoring: There are no operations, disturbed surface areas or man-made conditions at this stationary source that are subject to Rule.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u>  *If yes, attach Deviation Summary Form</p>





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<p>A. Attachment # or Permit Condition #: <b>8.e. Rule 57.1</b></p>	<p>D. Frequency of monitoring:</p> <p style="text-align: center;">Continuous</p>
<p>B. Description:</p> <p>Particulate Matter Emissions from Fuel Burning Equipment</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p> <p style="text-align: center;">n/a</p>
<p>C. Method of monitoring:</p> <p>Compliance assured based on District analysis (12/3/97).</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p><small>*If yes, attach Deviation Summary Form</small></p>

<p>A. Attachment # or Permit Condition #: <b>8.f. Rule 64.B.1</b></p>	<p>D. Frequency of monitoring:</p> <p style="text-align: center;">Continuous</p>
<p>B. Description:</p> <p>Sulfur Content of Fuels - Gaseous Fuel Requirements</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p> <p style="text-align: center;">SCAQMD Method 307-94 or ASTM Method D1072-90</p>
<p>C. Method of monitoring:</p> <p>Monitor source of natural gas and perform source test annually if non-PUC gas is burned.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p><small>*If yes, attach Deviation Summary Form</small></p>

<p>A. Attachment # or Permit Condition #:</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description:</p> <p style="text-align: center;">INTENTIONALLY BLANK</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring:</p>	<p>F. Currently in Compliance? (Y or N): _____</p> <p>G. Compliance Status? (C or I): _____</p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): _____</p> <p><small>*If yes, attach Deviation Summary Form</small></p>



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Period Covered by Compliance Certification: 04 / 01 / 19 (MM/DD/YY) to 03 / 31 / 20 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <u>8.G. Rule 74.6 (2003)</u></p>	<p>D. Frequency of monitoring:  Continuous</p>
<p>B. Description:  Surface Cleaning and Degreasing</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  n/a</p>
<p>C. Method of monitoring: Maintain current solvent information. Routine surveillance of solvent cleaning activities. Solvent testing upon request.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>8.h. Rule 74.11.1</u></p>	<p>D. Frequency of monitoring:  Continuous</p>
<p>B. Description:  Large Water Heaters and Small Boilers</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  n/a</p>
<p>C. Method of monitoring: Facility did not install an affected unit (between 75,000 BTU/hr and 2,000,000 BTU/hr).</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>8.i. Rule 74.22</u></p>	<p>D. Frequency of monitoring:  Continuous</p>
<p>B. Description: Natural Gas-Fired, Fan Type Central Furnaces</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  n/a</p>
<p>C. Method of monitoring: Maintain furnace identification. Rule only applies to future installs.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: <u>9.a. Rule 74.1</u></p>	<p>D. Frequency of monitoring:  <u>Continuous</u></p>
<p>B. Description:  <u>Abrasive Blasting</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <u>n/a</u></p>
<p>C. Method of monitoring: <u>Routine surveillance and visual inspections Abrasive blasting records including date, type of media used (ARB certification, if any), and item/location blasted are on file.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>9.b. Rule 74.2</u></p>	<p>D. Frequency of monitoring:  <u>Continuous</u></p>
<p>B. Description:  <u>Architectural Coatings</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <u>n/a</u></p>
<p>C. Method of monitoring: <u>Routine surveillance and visual inspections Vital Coatings (VCAPCD PTO 08244) performs architectural coating activities at the facility.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <u>9.c. 40CFR61.M</u></p>	<p>D. Frequency of monitoring:  <u>Continuous</u></p>
<p>B. Description:  <u>Asbestos NESHAPS</u></p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  <u>n/a</u></p>
<p>C. Method of monitoring: <u>Follow inspection, recordkeeping, and notification procedures from 40CFR61.145. No asbestos-related activities during compliance period.</u></p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: <b>10.a. Part 70 General</b></p>	<p>D. Frequency of monitoring:  Continuous</p>
<p>B. Description:  Part 70 Permit General Conditions, Rule 32</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  n/a</p>
<p>C. Method of monitoring: Throughput and emissions limits; other requirements of the permit; notification; permit modification and renewal; and reporting requirements.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>I</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>Y</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <b>10.b. PO General</b></p>	<p>D. Frequency of monitoring:  Continuous</p>
<p>B. Description:  Permit to Operate General Conditions</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  n/a</p>
<p>C. Method of monitoring: The facility operated in compliance with these requirements including postings.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <b>11.a 40CFR68RMP-157</b></p>	<p>D. Frequency of monitoring:  Continuous</p>
<p>B. Description:  Accidental Release Prevention and Risk Management Plans</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  n/a</p>
<p>C. Method of monitoring: The facility is exempt from federal regulation based on quantity stored. State plan was updated in 2016 in coordination with Oxnard Fire Dept.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: 11.b 40CFR82</p>	<p>D. Frequency of monitoring:  Continuous</p>
<p>B. Description: Protection of Stratospheric Ozone</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable n/a</p>
<p>C. Method of monitoring: Facility did not conduct activities subject to this regulation.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 11.c.1 SHIELD-D, Da, Db, Dc</p>	<p>D. Frequency of monitoring:  Continuous</p>
<p>B. Description: Permit Shield for 40CFR60, Subparts D, Da, Db, and Dc</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable n/a</p>
<p>C. Method of monitoring: Facility did not modify or install equipment that would trigger these requirements. Therefore, this permit shield remains in effect.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 11.c.2 SHIELD-60JJJJ</p>	<p>D. Frequency of monitoring:  Continuous</p>
<p>B. Description: Permit Shield for 40CFR60 Subpart JJJJ</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable n/a</p>
<p>C. Method of monitoring: Facility did not modify or install equipment that would trigger this requirement. Therefore, this permit shield remains in effect.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: 11.c.3. SHIELD-60KKKK</p>	<p>D. Frequency of monitoring: Continuous</p>
<p>B. Description: 40CFR60 Subpart KKKK, Standards of Performance for Stationary Combustion Turbines</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable n/a</p>
<p>C. Method of monitoring: Facility did not modify or install equipment that would trigger these requirements. Therefore, this permit shield remains in effect.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 11.c.4 SHIELD-63YYYY</p>	<p>D. Frequency of monitoring: Continuous</p>
<p>B. Description: National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable n/a</p>
<p>C. Method of monitoring: Emissions of Hazardous Air Pollutants remain less than major source thresholds (10 tpy single HAP, 25 tpy combined HAPs).</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 11.c.5 SHIELD-63JJJJJJ</p>	<p>D. Frequency of monitoring: Continuous</p>
<p>B. Description: Permit Shield for 40CFR Part 63, Subpart JJJJJJ</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable n/a</p>
<p>C. Method of monitoring: The boiler is a gas-fired boiler and exempt from this regulation.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 /18 (MM/DD/YY) to 03 / 31 /19 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: <b>11.c.6 SHIELD-40CFR72-78</b></p>	<p>D. Frequency of monitoring:  <b>Continuous</b></p>
<p>B. Description:  Permit Shield for 40CFR Parts 72 through 78</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  n/a</p>
<p>C. Method of monitoring: The facility supplied less than 219,000 MW-hr/yr to any utility power distribution system. Therefore, this permit shield remains in effect.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: <b>103N5-0157</b></p>	<p>D. Frequency of monitoring:  <b>Continuous</b></p>
<p>B. Description: Annual heat input capacity factor calculation.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable  n/a</p>
<p>C. Method of monitoring: Fuel meter and CEMS. Maximum rolling 12-month capacity factor is 4.302% and unit remains exempt from 103.A.2 (because the capacity factor is less than 30%).</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

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





**2019 - 2020  
Annual Title V Compliance Certification  
New-Indy Oxnard, LLC  
May 14, 2020**

**Section 5      Supporting Records**



# NEW INDY

CONTAINERBOARD

January 16, 2020

Ventura County Air Pollution Control District  
669 County Square Drive, Second Floor  
Ventura, CA 93003

Attention: Ed Swede  
Subject: Continuous Emission Monitoring System (CEMS) - Invalid Inlet NOx data

Dear Mr. Swede:

New-Indy Oxnard is submitting this follow-up report for the call made to VCAPCD Hotline by Robyn Lebrilla on January 14, 2020 at 11:05 AM.

On January 14 at 8:45 AM, Cogen Operator observed CEMS inlet NOx fault. During troubleshooting, E&I Technician found a damaged hose which caused the sample pump failure. Filter, pump and tubing were replaced, and system was dried out. A successful calibration was completed and CEMS was back online at 3:43 PM. Inlet NOx data was lost on January 14 from 8:43 AM to 3:43 PM, a total of 7 hours.

The Daily Emission Sheets, PI trends, ABB trends, Cogen Daily Log, and Environmental Incident Report have been provided for your review. If you have any questions or require any additional information, please call me at (805) 271-7271.

Sincerely,



Zhen Han  
Process Engineer

---

**NEW INDY OXNARD, LLC**

5936 PERKINS ROAD • OXNARD, CALIFORNIA 93033 • [WWW.NEWINDYCONTAINERBOARD.COM](http://WWW.NEWINDYCONTAINERBOARD.COM)  
PHONE (805) 986-3881 • FAX (805) 488-5186



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:

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

**Certification by Responsible Official**

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

<p>Signature and Title of Responsible Official:</p> <p>Signature: <u></u></p> <p>Title: <u>Mill Manager</u></p>	<p>Date:</p> <p><u>1/16/2020</u></p>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------

DAILY ENVIRONMENTAL REPORT

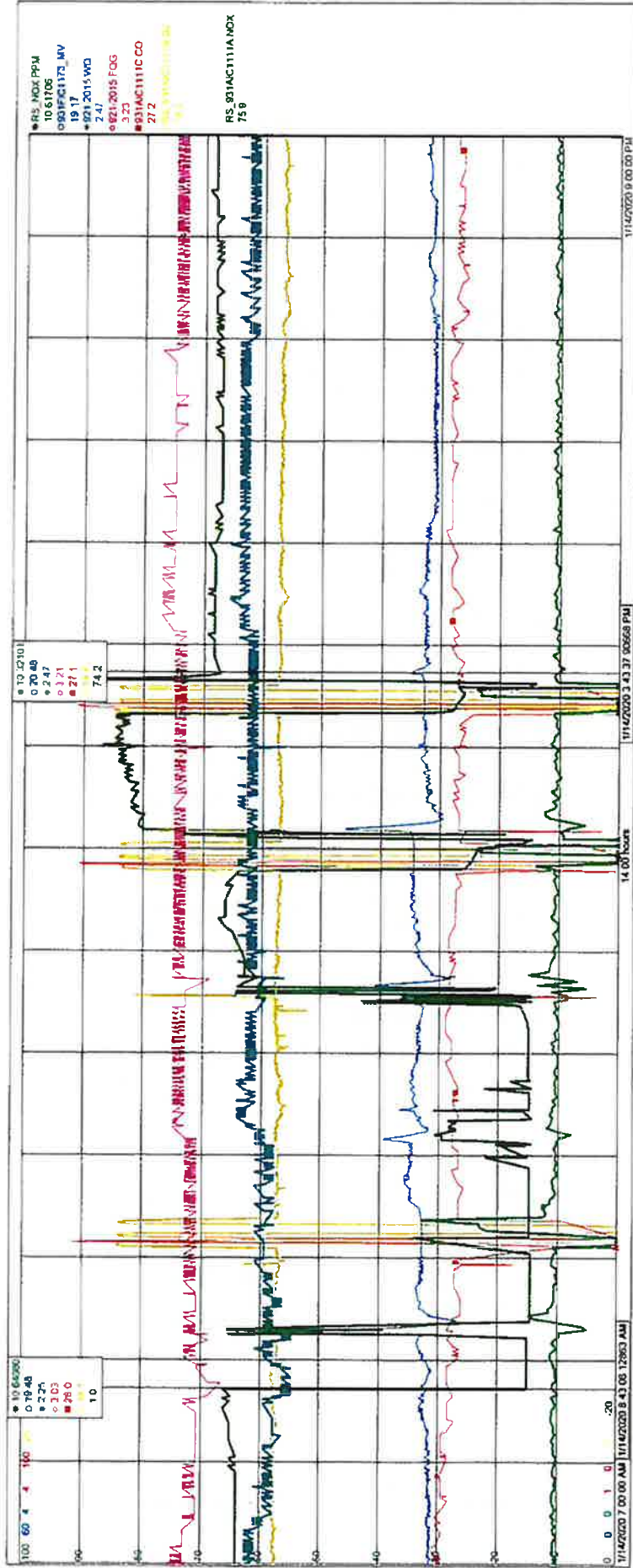
11/15/2020 7:00

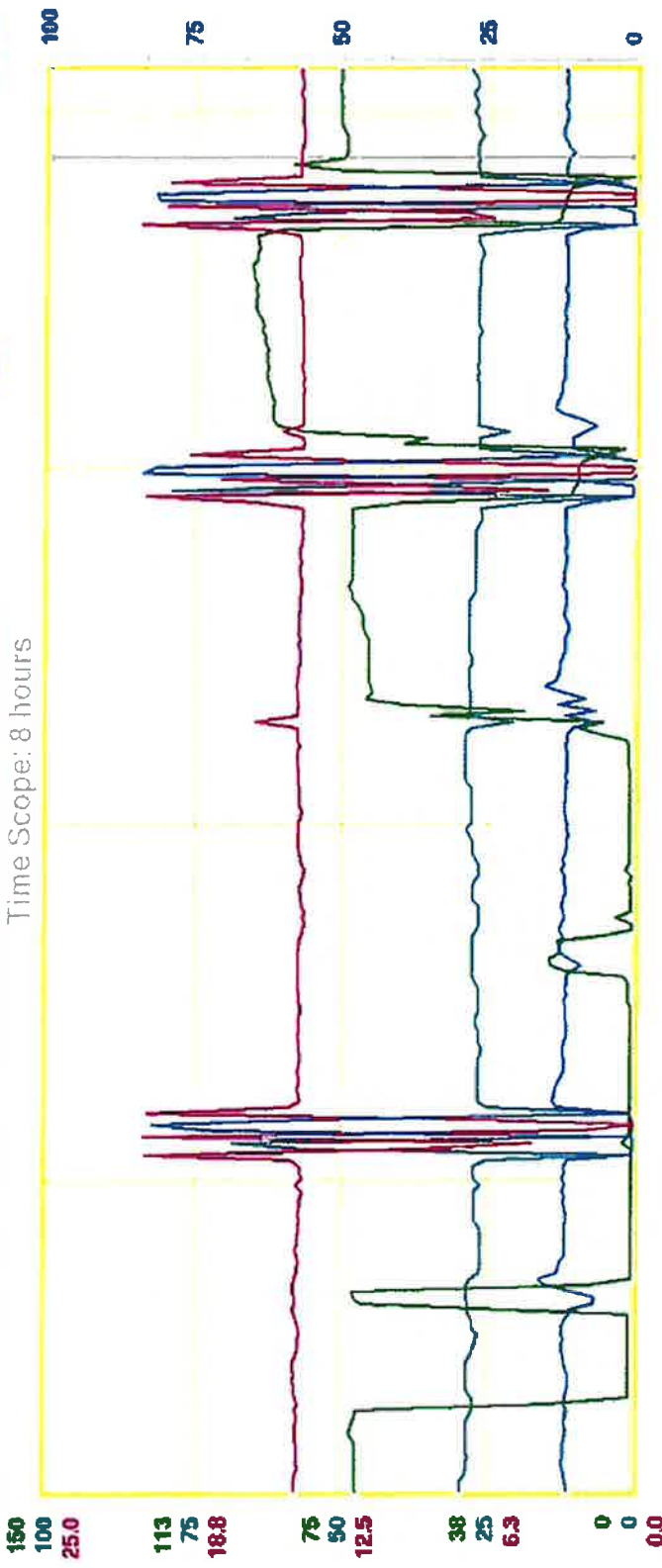
11/14/2020 7:00

11/15/2020 7:00

Time	Duct Burner gas flow MFCFH	Turbine gas flow MFCFH	Mann Burner gas flow MMBTU/HR	SCFH	SCR Inlet Temperature °F	SCR Inlet NOx ppm	Ammonia Usage ppm	HCl NOx mole ratio	Injection stream rate lbs/hr	Steam to heat ratio	NOx lbs/hr	Stack O2 %	Stack CO ppm	Stack CO2 ppm	Stack SO2 ppm	Stack NOx ppm	3h Running Average HCl lb	Midstack O2 %	Midstack NOx ppm	Midstack SO2 ppm	Midstack CO ppm	Daily Av Copm HCl	Daily Av Copm SO2	Daily Av Copm NOx
8:00	27.57	259.27	3.85	3785.65	714.85	69.68	18.89	0.65	2.39	0.76	11.32	14.42	27.11	17.87	10.48	10.48	20.84	0.00	0.00	0.00	0.00	11.00	11.00	11.00
9:00	28.27	254.40	3.61	2849.64	715.67	50.99	19.23	12.35	2.29	0.74	11.17	14.43	20.07	18.72	10.51	10.50	20.81	0.00	0.00	0.00	0.00	11.00	11.00	11.00
10:00	29.83	257.03	3.59	3539.87	717.44	6.63	20.12	105.79	2.34	0.74	11.18	14.30	24.51	18.94	10.47	10.49	20.75	0.00	0.00	0.00	0.00	11.00	11.00	11.00
11:00	25.00	259.05	3.85	3789.69	718.49	4.03	20.83	80.76	2.36	0.75	11.65	14.32	24.05	18.55	10.39	10.48	20.73	0.00	0.00	0.00	0.00	11.00	11.00	11.00
12:00	18.65	202.93	3.65	3783.16	720.29	5.75	20.59	60.63	2.46	0.77	11.37	14.29	24.40	18.09	10.48	10.43	20.71	0.00	0.00	0.00	0.00	11.00	11.00	11.00
13:00	18.65	202.25	3.89	3789.86	709.78	29.50	20.21	27.18	2.45	0.76	11.14	14.43	25.76	18.35	10.51	10.48	20.71	0.00	0.00	0.00	0.00	11.00	11.00	11.00
14:00	17.24	204.38	3.88	3784.50	708.13	59.78	20.58	1.13	2.46	0.77	9.99	13.28	20.51	13.12	9.83	10.27	20.71	0.00	0.00	0.00	0.00	11.00	11.00	11.00
15:00	17.12	205.15	3.87	3750.85	708.17	83.20	19.83	1.64	2.46	0.77	9.81	14.34	21.24	12.05	8.84	8.78	20.72	0.00	0.00	0.00	0.00	11.00	11.00	11.00
16:00	18.66	205.32	3.87	3751.68	708.13	64.82	19.65	1.19	2.47	0.77	9.81	14.34	21.24	12.05	8.84	8.78	20.72	0.00	0.00	0.00	0.00	11.00	11.00	11.00
17:00	19.06	206.60	3.87	3780.84	710.31	79.77	19.59	0.65	2.53	0.76	11.29	14.25	24.49	18.03	10.52	8.11	20.76	0.00	0.00	0.00	0.00	11.00	11.00	11.00
18:00	17.23	208.44	3.89	3774.78	707.34	74.25	18.73	0.64	2.53	0.76	11.22	14.25	25.23	18.43	10.49	9.99	20.87	0.00	0.00	0.00	0.00	11.00	11.00	11.00
19:00	19.15	208.35	3.92	3784.82	709.76	74.27	18.90	0.64	2.51	0.76	11.25	14.23	24.69	18.10	10.48	10.50	20.78	0.00	0.00	0.00	0.00	11.00	11.00	11.00
20:00	25.06	265.70	3.80	3765.46	720.10	74.82	18.95	0.63	2.46	0.77	11.48	14.10	23.24	13.46	10.48	10.49	20.76	0.00	0.00	0.00	0.00	11.00	11.00	11.00
21:00	25.56	264.33	3.81	3768.55	721.43	75.43	19.06	0.63	2.47	0.77	11.48	14.10	23.25	13.54	10.50	10.49	20.76	0.00	0.00	0.00	0.00	11.00	11.00	11.00
22:00	25.76	263.83	3.80	3781.37	720.32	76.12	19.35	0.63	2.46	0.77	11.57	14.13	23.56	13.60	10.50	10.51	20.72	0.00	0.00	0.00	0.00	11.00	11.00	11.00
23:00	25.74	269.35	3.80	3781.98	719.38	74.38	18.59	0.61	2.53	0.76	11.53	14.13	24.70	13.56	10.49	10.51	20.72	0.00	0.00	0.00	0.00	11.00	11.00	11.00
0:00	29.10	295.35	3.88	3780.50	721.28	74.22	18.59	0.60	2.53	0.76	11.68	14.08	24.68	13.77	10.49	10.51	20.78	0.00	0.00	0.00	0.00	11.00	11.00	11.00
1:00	29.10	295.42	3.87	3789.89	721.68	74.47	18.64	0.60	2.50	0.77	11.79	14.08	24.98	13.59	10.49	10.51	20.78	0.00	0.00	0.00	0.00	11.00	11.00	11.00
2:00	30.25	289.01	3.88	3782.78	724.88	75.57	18.65	0.60	2.51	0.77	11.72	14.08	24.84	13.54	10.50	10.51	20.79	0.00	0.00	0.00	0.00	11.00	11.00	11.00
3:00	30.25	285.23	3.88	3771.08	724.84	77.00	19.17	0.61	2.48	0.77	11.72	14.08	24.84	13.54	10.50	10.51	20.79	0.00	0.00	0.00	0.00	11.00	11.00	11.00
4:00	30.53	283.37	3.80	3770.95	724.54	77.35	19.37	0.61	2.47	0.77	11.37	14.10	24.45	13.41	10.44	10.50	20.81	0.00	0.00	0.00	0.00	11.00	11.00	11.00
5:00	30.95	282.25	3.89	3764.87	724.37	77.31	19.40	0.62	2.46	0.77	11.61	14.10	24.44	13.44	10.44	10.51	20.82	0.00	0.00	0.00	0.00	11.00	11.00	11.00
6:00	30.87	282.80	3.89	3763.87	724.45	77.48	19.47	0.62	2.47	0.77	11.64	14.10	24.57	13.56	10.53	10.51	20.84	0.00	0.00	0.00	0.00	11.00	11.00	11.00
7:00	31.00	280.88	3.89	3764.48	722.28	78.19	18.63	0.62	2.45	0.76	11.37	14.12	24.61	13.45	10.53	10.53	20.83	0.00	0.00	0.00	0.00	11.00	11.00	11.00

Comments: CEMS inlet NOx lost data on 11/14/20 from 8:43 AM to 3:43 PM. VCAPCD was notified on 11/14/20 at 11:05 AM





150  
100  
25.0  
113  
75  
18.8  
75  
50  
12.5  
38  
25  
6.3  
0  
0  
0.0

10:00 12:00 14:00 15:00  
 2020-01-14

OH Name	Description	Attribute	Treatment	Ruler Time	Ruler Value	Current Value	Unit	Filter	Time Offset	Form
931AIC1111A.NOX	B&W SCR INLET NOX	MV	Mem	15-44 2020-01-14	74.95	75.80	PPM			
931AIC1111C.CO	B&W BLR STACK RAW CO	MV	Mem	15-44 2020-01-14	20.38	28.10	PPM			
931AIC1111B.O2	B&W BLR RAW O2%	MV	Mean	15-44 2020-01-14	14.32	14.46	%			
931AIC1111D.NOX	B&W BLR STACK NOX	MV	Mean	15-44 2020-01-14	11.52	10.97	PPM			
931-AIC-1111INCAL	RSMT CEMS IN CAL	MV	Mem	---	---	0				
931-aic-1111.tfb	RSMT CEMS TROUBLE	MV	Mem	---	---	1				

01 30 minutes 02 1 hour 03 1 day 04 10 days

05 Positioning... 06 Trace Control... 07 Trace Config... 08 Analyze... 09 Extended Config...



NEW-INDY CONTAINERBOARD OFFICIAL DAILY COGENERATION LOG DATE: 19 JAN 20

PDF Created with deskPDF Writer - Trial :: http://www.docudesk.com

PERMATE H<sub>2</sub>O CONCENTRATE H<sub>2</sub>O HP LP SCS LP TURBINE MEGAWATS

188.9049 9803421 23465 2187 0957620 2651190 3144866 506427 37165

1825132 5797129 225010 2119 0919870 2274410 3135725 541591 36555

STEAM & WATER READINGS				GAS & ELECTRIC READINGS			
PERMATE H <sub>2</sub> O	CONCENTRATE H <sub>2</sub> O	HP	LP	MAXON	DUCT BURNER	MEGAWATS	
188.9049	9803421	23465	2187	0957620	3144866	506427	37165
1825132	5797129	225010	2119	0919870	3135725	541591	36555

AMMONIA DELIVERY				BOILER TEST RESULTS			
PERMATE H <sub>2</sub> O	CONCENTRATE H <sub>2</sub> O	HP	LP	DUCT BURNER	MEGAWATS		
188.9049	9803421	23465	2187	3144866	506427	37165	
1825132	5797129	225010	2119	3135725	541591	36555	

TURBINE				GENERATOR				COGEN BOILER				COMPRESSORS			
PERMATE H <sub>2</sub> O	CONCENTRATE H <sub>2</sub> O	HP	LP	DUCT BURNER	MEGAWATS			DUCT BURNER	MEGAWATS			DUCT BURNER	MEGAWATS		
188.9049	9803421	23465	2187	3144866	506427	37165		3144866	506427	37165		3144866	506427	37165	
1825132	5797129	225010	2119	3135725	541591	36555		3135725	541591	36555		3135725	541591	36555	

NAME: BENAVIDES NAME: NAME: SOUTH TANK FEET

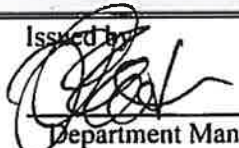
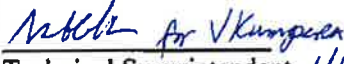

Temp. cooling 'F T1 T2 4.63

BOILER FEEDWATER  
 PH 8.75 - 9.5  
 Conductivity <20mmhos  
 Silica  
 K.O.  
 Feed IODS<1000 ppm  
 Permanta IODS<10 ppm  
 PH (Feed 7.5)  
 CONDENSATE  
 PH-ph 8.5 - 9.5  
 Conductivity <20mmhos  
 LP-ph 8.5 - 9.5  
 Conductivity <20mmhos  
 HP  
 PH 9.5 - 10.5  
 Conductivity 75-150  
 Phosphate 9-15 ppm  
 Silica  
 Iron ppm  
 Iron ppm  
 pH 9.5 - 10.5  
 Conductivity 75 - 150  
 Phosphate 3-15 ppm  
 Silica  
 Iron ppm  
 Mixed Bed  
 pH 6.0 - 7.5  
 Conductivity <1mmhos  
 Silica  
 HP Steam Test  
 Silica  
 SOFTENER  
 Haraheata <1.0 ppm  
 Running (1 or 2)  
 STEAM TEST  
 Silica <20 ppb  
 PV NO.2  
 HP BLOW DOWN  
 TIME: 9:00  
 NORTH TANK  
 SOUTH TANK  
 FEET  
 SALT  
 NOTES:  
 CHANGE TO PIC 160 TO 20 FROM 18  
 CHANGE SP PIC 850 TO 18 FROM 16.5  
 PER PJD



# New-Indy Oxnard Environmental Incident Report

Shaded section to be completed by the EMR

Name of Incident <b>Invalid Inlet NOx Data</b>		Incident Date <b>1/14/20</b>	
Exact Location Incident <b>Cogen</b>			
Reported By: <b>Robyn Lebrilla</b>	Estimated Start and Stop Times of Incident: <b>1/14 8:43 AM – 3:43 PM</b>		Possible Cause: <b>Water in sample handler</b>
Incident Type: <input type="checkbox"/> Spill Internal <input type="checkbox"/> Improper Waste Disposal <input type="checkbox"/> Spill External <input type="checkbox"/> Near miss or below spill release guidelines <input checked="" type="checkbox"/> Air Emission <input type="checkbox"/> Other _____		Released To <input type="checkbox"/> Storm Water System <input type="checkbox"/> Secondary Containment <input type="checkbox"/> Process Sewer <input checked="" type="checkbox"/> Air <input type="checkbox"/> Ground (External) <input type="checkbox"/> Ground (Inside Mill Property) <input type="checkbox"/> Near Miss <input type="checkbox"/> Other _____	
Detailed Description of Event:  1/14 8:45am Cogen Operator contacted E&I to resolve NOx inlet fault. Technician found damaged hose which caused the sample pump to fail. Filter, pump and tubing was replaced, and system dried out. CEM's was calibrated, calibration accuracy was verified, and unit was back online at 3:43 pm.  (if required use additional paper and attach)			
Estimated Amount Released	pH	CONSISTENCY (%)	Estimated Monetary Loss
<input type="checkbox"/> _____ Gallons <input type="checkbox"/> _____ Pounds <input type="checkbox"/> Other _____			
		No. of Emergency Sandbags used	After event, Sandbags Removed/Disposed
		<input type="checkbox"/> _____ Bags <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No
List Any External Emergency Clean Up Personnel Contacted N/A		List Any External Agencies Contacted (Agency, person and time of call.) V/CAPCD on 1/14/20 at 11:05 AM	
List Hueneme Personnel Contacted (Foreman, Mill Manager, etc.) Robyn Lebrilla		Any Acute or Chronic Health Risks (refer to MSDS) N/A	
Describe Any Emergency Response Actions Filter, pump and tubing was replaced, and system dried out.			
Suggestions to Prevent Reoccurrence			Estimated Completion Date
1. Continue 3-month PM for system maintenance. This PM includes tubing inspection and replacement.			1. 1/15/2020
2. After major repairs are conducted, conduct 3-month PM to verify system is in proper condition.			2. 1/15/2020
3.			3.
4.			4.
Root Cause after investigation  Damaged hose		Severity Level (level 1 and 2 must be tracked through SHIMS) <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4	
Investigated By: <b>Mark Wilder</b>		Investigated Date: <b>1/14/2020</b>	
<u>Follow Up</u>		<u>By When</u>	<u>Completion Date</u>
Issued by  Department Manager	Reviewed by  Technical Superintendent	Approved by  Mill Manager	

Print Time: 1/15/2020 1:43:04 PM

Note: This document is valid for only ONE week after print time!

# NEW INDY

## CONTAINERBOARD

March 19, 2020

Ventura County Air Pollution Control District  
669 County Square Drive, Second Floor  
Ventura, CA 93003

Attention: Ed Swede  
Subject: Continuous Emission Monitoring System (CEMS) – Data Loss

Dear Mr. Swede:

New-Indy Oxnard is submitting this follow-up report for the call made to VCAPCD Hotline by Zhen Han on March 16, 2020 at 4:30 PM.

On March 16 at 3:30 PM, Cogen operator noticed emission data loss. Appropriate personnel were notified immediately. During troubleshooting, E&I Technician found that the UPS (Uninterruptible Power Supply) for CEMS analyzer had lost power. UPS was restored and will be secured to prevent this incident from happening again. CEMS was back online at 4:13 PM. CEMS lost emission data on March 16 from 3:30 PM to 4:13 PM, a total of 0.72 hour. There were no excess emissions during this event.

The Daily Emission Sheets, PI trends, ABB trends, Cogen Daily Log, and Environmental Incident Report have been provided for your review. If you have any questions or require any additional information, please call me at (805) 271-7271.

Sincerely,



Zhen Han  
Process Engineer

---

**NEW INDY OXNARD, LLC**

5936 PERKINS ROAD • OXNARD, CALIFORNIA 93033 • [WWW.NEWINDYCONTAINERBOARD.COM](http://WWW.NEWINDYCONTAINERBOARD.COM)  
PHONE (805) 986-3881 • FAX (805) 488-5186



Ventura County  
Air Pollution  
Control District

## RESPONSIBLE OFFICIAL'S CERTIFICATION FORM

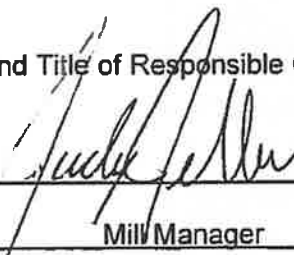
Ventura County APCD Rule 33.9 requires that "any document, including reports, schedule of compliance progress reports and compliance certifications, required by a Part 70 permit shall be certified by a responsible official." Therefore, this form shall be signed by the company's Responsible Official and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

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

### Certification by Responsible Official

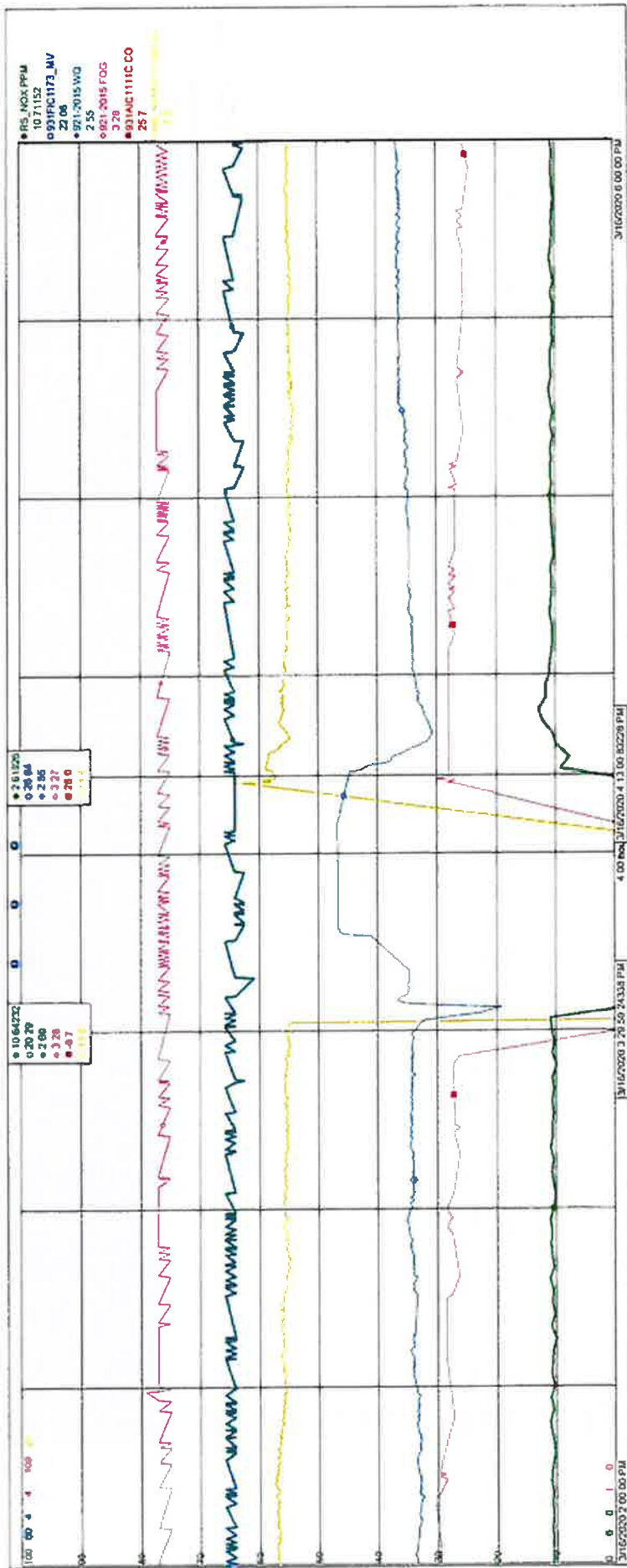
I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this document is true, accurate, and complete.

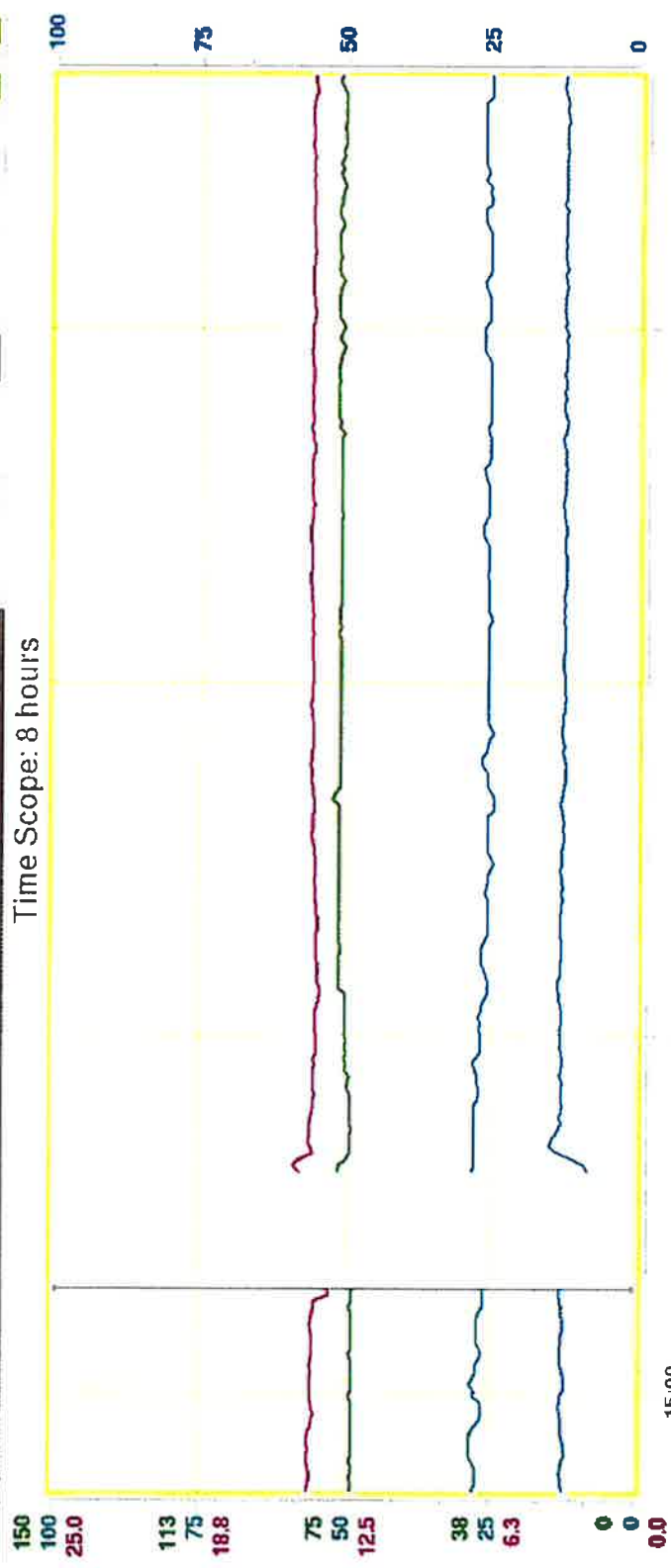
<p>Signature and Title of Responsible Official:</p> <p>Signature: <u></u></p> <p>Title: <u>Mill Manager</u></p>	<p>Date:</p> <p><u>3/19/2020</u></p>
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**DAILY ENVIRONMENTAL REPORT**

Time	3/17/2020 7:00				3/16/2020 7:00															
	Daily Burner gas flow MSCFH	Turbine gas flow MSCFH	Stationary gas flow MSCFH	SCR Inlet Temperature °F	SCR Inlet Temperature °F	SCR Inlet Temperature °F	SCR Inlet Temperature °F	SCR Inlet Temperature °F												
8:00	11.06	200.60	3.89	693.34	70.24	20.60	11.13	14.25	24.00	15.41	10.49	10.58	20.85	0.00	Daily Av Copm NOx	11.18	BH	Daily Av Copm NOx	11.18	BH
9:00	13.57	209.69	2.36	706.74	75.51	20.65	11.17	14.21	24.01	15.60	10.44	10.49	20.69	0.00						
10:00	8.62	207.03	3.71	705.65	75.64	20.75	11.02	14.30	23.31	14.98	10.47	10.47	20.69	0.00						
11:00	23.74	200.35	3.74	721.12	75.70	21.75	11.65	14.00	22.15	15.18	10.81	10.51	20.68	0.00						
12:00	24.79	270.27	3.75	728.72	75.60	21.87	11.82	13.95	21.90	15.05	10.51	10.53	20.68	0.00						
13:00	25.50	270.18	3.82	728.13	73.03	21.87	11.82	13.95	21.90	15.05	10.51	10.53	20.68	0.00						
14:00	15.61	209.59	2.50	710.27	73.50	20.67	11.42	14.17	24.87	18.31	10.46	10.53	20.00	0.00						
15:00	17.25	211.47	3.76	711.13	73.61	20.18	11.65	14.00	24.60	18.23	10.56	10.56	20.77	0.00						
16:00	26.70	270.78	3.80	729.26	78.83	22.25	8.51	5.84	10.80	7.77	4.68	8.48	20.64	0.00						
17:00	26.92	270.98	3.84	730.80	78.95	22.15	8.14	12.18	21.21	12.48	7.83	7.54	20.70	0.00						
18:00	26.39	270.20	3.78	729.82	78.48	21.59	11.92	13.74	21.41	14.80	10.52	7.51	20.70	0.00						
19:00	25.30	270.52	3.79	729.34	78.87	22.01	11.84	13.92	21.61	14.83	10.57	9.57	20.75	0.00						
20:00	24.37	267.54	3.81	728.38	78.69	21.82	11.83	13.96	21.60	14.85	10.45	10.51	20.75	0.00						
21:00	24.17	269.65	3.80	724.93	76.55	21.82	11.78	13.99	22.02	15.07	10.47	10.50	20.75	0.00						
22:00	24.84	271.21	3.80	726.83	76.83	21.84	11.87	13.97	22.00	15.20	10.51	10.48	20.75	0.00						
23:00	24.32	270.54	3.54	729.97	76.82	21.69	11.82	14.00	22.31	15.23	10.47	10.48	20.76	0.00						
0:00	10.58	270.90	2.74	700.21	75.98	20.82	11.22	14.30	24.18	15.74	10.48	10.48	20.77	0.00						
1:00	18.71	270.90	3.72	736.41	73.83	19.82	11.56	14.14	25.11	16.58	10.49	10.48	20.85	0.00						
2:00	24.71	269.85	3.73	719.89	72.87	19.68	11.81	14.00	24.82	16.88	10.49	10.49	20.86	0.00						
3:00	25.70	270.89	3.74	722.08	72.75	19.72	11.86	14.03	24.45	16.79	10.48	10.50	20.87	0.00						
4:00	27.05	267.46	3.75	722.87	72.44	19.63	11.96	14.03	24.45	16.45	10.51	10.51	20.88	0.00						
5:00	14.00	267.20	2.72	698.50	72.15	18.90	11.36	14.32	27.89	17.81	10.47	10.48	20.88	0.00						
6:00	13.70	264.66	1.41	698.15	72.83	19.12	11.28	14.31	28.89	17.50	10.47	10.48	20.85	0.00						
7:00	13.85	271.30	3.73	700.00	73.97	19.42	11.45	14.27	29.89	17.97	10.51	10.48	20.81	0.00						

Comments Emission data was lost due to power loss on 3/16/20 from 3:30 PM to 4:13 PM, a total of 0.72 hour VCAPCD was notified on 3/16/20 at 4:30 PM





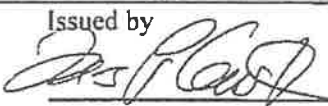

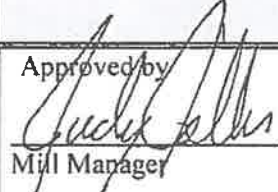
ON/Name	Description	Attribute	Treatment	Ruler Time	Ruler Value	Current Value	Unit	Filter	Time Offset	Form	
D1	B&W SCRINLET NOX	MV	Mem	15:34 2020-03-16	---	81.28	PPM				
D2	B&W BLR STACK RAW GO	MV	Mem	15:34 2020-03-16	---	24.38	PPM				
D3	B&W BLR RAW O2%	MV	Mean	15:34 2020-03-16	---	14.05	%				
D4	B&W BLR STACK NOX	MV	Mean	15:34 2020-03-16	---	12.28	PPM				
D5	RSMT GEMS IN CAL	MV	Mem	---	---	0					
D6	RSMT GEMS TROUBLE	MV	Mem	---	---	1					
D7	30 minutes			D3	1 hour	D4	8 hours	D5	1 day	D6	10 days
D8	Positioning...			D7	Trace Control...	D8	Analyze...	D9	Trace Config...	D10	Extended Config...





## New-Indy Oxnard Environmental Incident Report

Shaded section to be completed by the EMR

Name of Incident Emission Data Loss		Incident Date 3/16/20	
Exact Location Incident Cogen			
Reported By: Zhen Han		Estimated Start and Stop Times of Incident: 3/16 3:30 PM – 4:13 PM	Possible Cause: Lost control power to Analyzer
Incident Type: <input type="checkbox"/> Spill Internal <input type="checkbox"/> Spill External <input checked="" type="checkbox"/> Air Emission <input type="checkbox"/> Other _____		Released To <input type="checkbox"/> Storm Water System <input type="checkbox"/> Process Sewer <input type="checkbox"/> Ground (External) <input type="checkbox"/> Near Miss <input type="checkbox"/> Other _____	
<input type="checkbox"/> Improper Waste Disposal <input type="checkbox"/> Near miss or below spill release guidelines		<input type="checkbox"/> Secondary Containment <input checked="" type="checkbox"/> Air <input type="checkbox"/> Ground (Inside Mill Property)	
Detailed Description of Event: Operator quickly noticed loss of signal to DCS and set ammonia valve to a position greater than operation prior to loss of power. E&I contacted, and cause resolved. UPS lost power.			
(if required use additional paper and attach)			
Estimated Amount Released		pH	CONSISTENCY (%)
<input type="checkbox"/> _____ Gallons <input type="checkbox"/> _____ Pounds <input type="checkbox"/> Other _____			
		Estimated Monetary Loss	No. of Emergency Sandbags used
			<input type="checkbox"/> _____ Bags <input type="checkbox"/> N/A
List Any External Emergency Clean Up Personnel Contacted N/A		List Any External Agencies Contacted (Agency, person and time of call.) V/CAPCD on 3/16/20 at 4:30PM	
List Hueneme Personnel Contacted (Foreman, Mill Manager, etc.) Robyn Lebrilla, James West and Lars Gustavson		Any Acute or Chronic Health Risks (refer to MSDS) N/A	
Describe Any Emergency Response Actions: Power was restored			
Suggestions to Prevent Reoccurrence			Estimated Completion Date
1. Secure power source.			1. 3/27/20
2.			2.
3.			3.
4.			4.
Root Cause after investigation: Loss of power.		Severity Level (level 1 and 2 must be tracked through SHIMS)	
		<input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4	
Investigated By: Lars Gustavson		Investigated Date: 3/16/20	
<u>Follow Up</u>		<u>By When</u>	<u>Completion Date</u>
Issued by  Department Manager	Reviewed by  Technical Superintendent	Approved by  Mill Manager	
	3/17/20		3/19/2020

Print Time: 3/17/2020 3:56:48 PM

Note: This document is valid for only ONE week after print time!



# NEW INDY

**CONTAINERBOARD**

March 30, 2020

Ventura County Air Pollution Control District  
669 County Square Drive, Second Floor  
Ventura, CA 93003

Attention: Ed Swede  
Subject: Continuous Emission Monitoring System (CEMS) – Data Loss

Dear Mr. Swede:

New-Indy Oxnard is submitting this follow-up report for the call made to VCAPCD Hotline by Zhen Han on March 26, 2020 at 10:40 AM.

On March 26 at 8:18 AM, all data from PI data collection system (PI) flatlined. While troubleshooting, it was discovered that a wrong month (5/26 rather than 3/26) was inadvertently entered to correct the time on DCS (Distributed Control System), which was off by a few minutes. *NOTE: CEMS data are collected in the DCS and saved for a maximum of 10 days. Real-time data from DCS are transferred and stored in PI.*

The forward leap of two months caused PI to error as it could not record data in the future. Once the date on DCS was corrected, both DCS and PI started recording valid data. Emission data was lost on March 26 from 8:18 AM to 11:51 AM, a total of 3.55 hours. To prevent this incident from recurring, a SOP for updating/changing date and time parameters in DCS will be developed.

The Daily Emission Sheets, PI trends, ABB trends, Cogen Daily Log, and Environmental Incident Report have been provided for your review. If you have any questions or require any additional information, please call me at (805) 271-7271.

Sincerely,



Zhen Han  
Process Engineer

---

**NEW INDY OXNARD, LLC**

5936 PERKINS ROAD • OXNARD, CALIFORNIA 93033 • WWW.NEWINDYCONTAINERBOARD.COM  
PHONE (805) 986-3881 • FAX (805) 488-5186



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:

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

### Certification by Responsible Official

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

<p>Signature and Title of Responsible Official:</p> <p>Signature: <u></u></p> <p>Title: <u>Mill Manager</u></p>	<p>Date:</p> <p><u>3/31/2020</u></p>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------

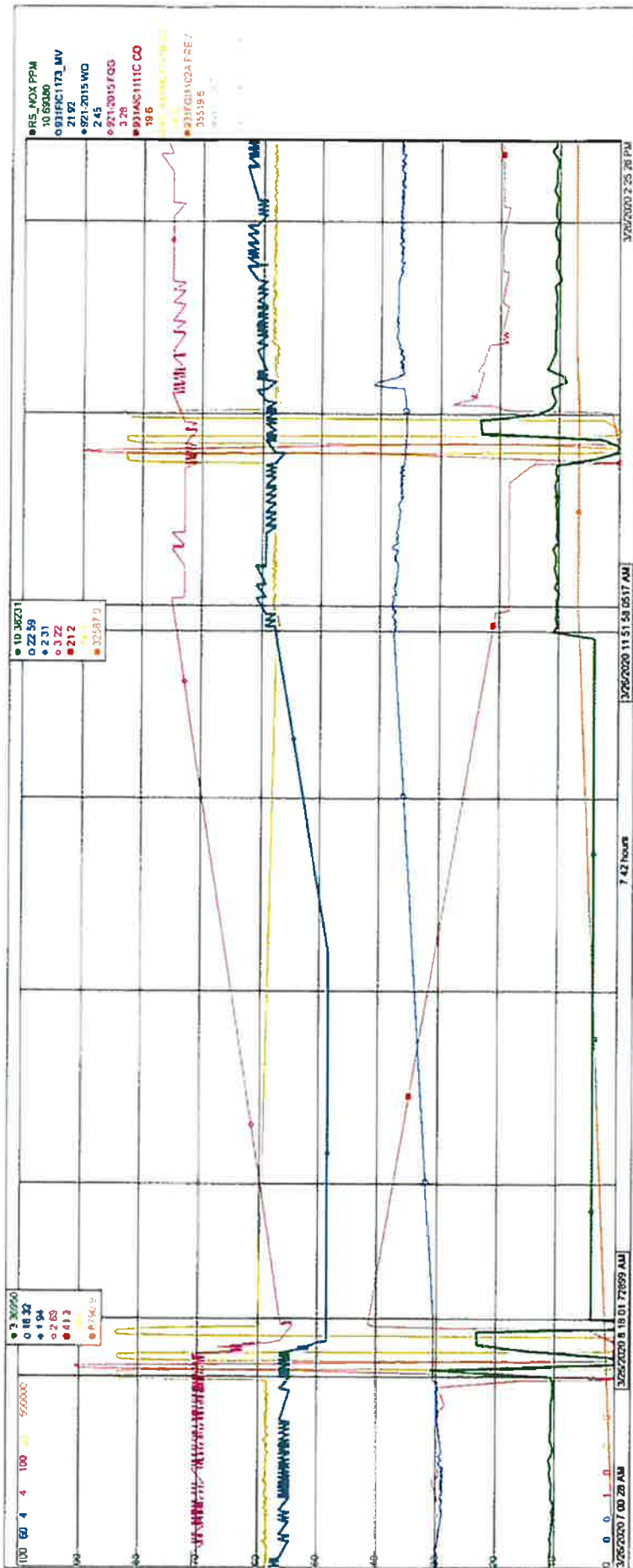
**DAILY ENVIRONMENTAL REPORT**

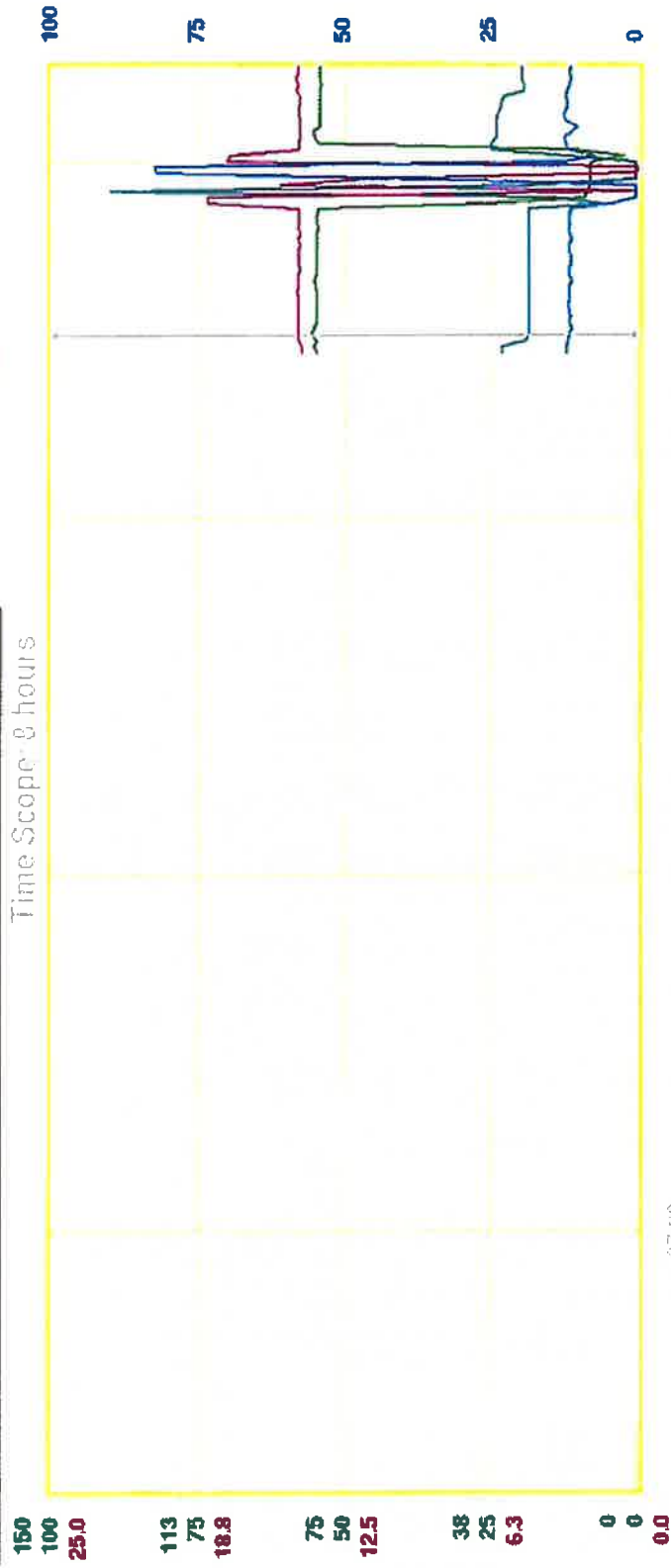
3/27/2020 7:00

3/27/2020 7:00

Time	Dust Burner ppm MDOCFH	Turnine ppm MDOCFH	Moloch Burner ppm MDOCFH	SCF Temperature °F	SCF Inlet ppm	Aromatics ppm	NH <sub>3</sub> TCH micro molar	Emission rate lb/hr	Oxygen to fuel ratio	NOx ppm	SO <sub>2</sub> ppm	Stack O <sub>2</sub> %	Stack CO ppm	Stack CO 15% O <sub>2</sub> ppm	Nitrobenzo CO %	Nitrobenzo NOx ppm	Nitrobenzo Corrected NOx (ppm)	Daily Air Cogen lb/hr	Daily Air Cogen lb/hr	Daily Air Cogen lb/hr
8:00	6.76	253.54	0.00	674.89	60.42	17.72	0.68	2.22	0.72	10.47	14.75	27.82	18.83	20.68	0.00	0.00	0.00	0.00	0.00	
9:00	6.83	229.85	0.00	664.27	11.17	18.70	0.75	1.98	0.72	3.46	14.95	26.13	21.96	20.87	0.00	0.00	0.00	0.00	0.00	
10:00	6.83	220.25	0.00	660.81	29.06	18.74	0.75	1.84	0.73	3.46	14.81	24.51	21.96	20.87	0.00	0.00	0.00	0.00	0.00	
11:00	6.83	220.25	0.00	660.81	60.84	21.45	0.75	2.10	0.73	3.46	14.68	26.22	21.96	20.87	0.00	0.00	0.00	0.00	0.00	
12:00	6.53	220.25	0.25	655.88	73.80	22.14	0.76	2.23	0.74	4.09	14.45	22.72	20.29	20.88	0.00	0.00	0.00	19.79	16.29	
13:00	6.07	258.06	1.10	618.55	82.10	22.05	0.75	2.36	0.74	10.18	14.48	19.02	10.03	20.87	0.00	0.00	0.00	zero value	zero value	
14:00	6.05	265.06	0.00	633.55	78.35	22.13	0.72	2.42	0.75	10.54	14.53	18.15	11.20	20.68	0.00	0.00	0.00	zero value	zero value	
15:00	6.83	265.35	0.00	630.87	77.27	21.87	0.75	2.46	0.75	10.51	14.37	17.58	11.09	20.71	0.00	0.00	0.00	zero value	zero value	
16:00	6.55	265.35	0.00	633.06	80.83	21.40	0.74	2.45	0.75	10.85	14.37	20.60	13.95	20.88	0.00	0.00	0.00	zero value	zero value	
17:00	6.55	265.35	0.00	633.06	78.86	21.50	0.75	2.45	0.75	10.85	14.37	20.60	13.95	20.88	0.00	0.00	0.00	zero value	zero value	
18:00	6.76	294.81	0.00	632.48	78.99	21.18	0.69	2.42	0.75	10.88	14.40	22.41	16.18	20.88	0.00	0.00	0.00	zero value	zero value	
19:00	5.99	294.47	1.29	633.31	78.23	21.03	0.70	2.45	0.75	10.82	14.41	22.01	13.88	20.88	0.00	0.00	0.00	zero value	zero value	
20:00	5.32	281.49	0.33	634.31	79.63	21.00	0.70	2.35	0.74	10.66	14.46	21.03	13.00	20.84	0.00	0.00	0.00	zero value	zero value	
21:00	11.22	281.23	0.00	637.26	79.04	21.60	0.69	2.30	0.74	10.89	14.34	24.17	15.24	20.82	0.00	0.00	0.00	zero value	zero value	
22:00	6.00	281.40	0.00	638.35	78.30	20.58	0.68	2.37	0.74	10.84	14.42	24.19	15.00	20.83	0.00	0.00	0.00	zero value	zero value	
23:00	6.64	281.90	0.00	637.59	77.48	20.21	0.66	2.39	0.74	10.88	14.46	24.30	15.16	20.80	0.00	0.00	0.00	zero value	zero value	
0:00	6.75	299.18	0.00	635.25	74.74	19.20	0.67	2.45	0.75	10.96	14.48	25.64	16.18	20.42	0.00	0.00	0.00	zero value	zero value	
1:00	7.36	295.49	0.00	635.14	74.49	19.96	0.66	2.42	0.75	10.95	14.48	25.40	18.79	20.86	0.00	0.00	0.00	zero value	zero value	
2:00	6.00	299.18	0.00	633.68	73.33	19.72	0.65	2.42	0.75	10.96	14.45	27.82	17.79	20.84	0.00	0.00	0.00	zero value	zero value	
3:00	9.40	295.94	0.00	636.35	72.19	18.10	0.64	2.43	0.75	11.04	14.47	28.07	18.48	20.82	0.00	0.00	0.00	zero value	zero value	
4:00	6.68	295.60	0.00	635.20	72.11	18.02	0.65	2.41	0.75	10.95	14.49	28.00	18.23	20.90	0.00	0.00	0.00	zero value	zero value	
5:00	14.88	298.18	3.62	635.92	695.38	75.34	0.64	2.46	0.76	11.31	14.33	28.41	18.50	20.00	0.00	0.00	0.00	zero value	zero value	
6:00	25.09	298.18	3.75	636.06	711.38	72.11	0.63	2.47	0.76	11.89	14.14	28.73	18.17	20.00	0.00	0.00	0.00	zero value	zero value	
7:00	29.20	293.54	3.73	634.56	721.02	73.68	0.64	2.43	0.75	11.77	14.00	25.00	17.28	20.85	0.00	0.00	0.00	zero value	zero value	

Comments: Emission data loss was on 3/26/20 from 8:18 AM to 11:51 AM, a total of 3:55 hours. VCAPCD was notified on 3/28/20 at 10:40 AM





07:00 09:00 11:00

ON Name	Description	Attribute	Treatment	Ruler/Time	Ruler Value	Current Value	Unit	Filter	Time Offset	Form
951AIC1111A\NOX	BAW SGT INERT\NOX	MV	Mem	12:02 2020-03-26	93.48	90.91	PPM			
957AIC1111C\CO	BAW BLR STACK\RAW CO	MV	Mem	12:02 2020-03-26	10.41	24.50	PPM			
951AIC1111B\O2	BAW BLR\RAW\O2%	MV	Mean	12:02 2020-03-26	14.51	14.00	%			
957AIC1111D\NOX	BAW BLR STACK\NOX	MV	Mean	12:02 2020-03-26	11.38	12.41	PPM			
951-AIC-1111\NCAL	RSM1 CEMS IN CAL	MV	Mem			0				
951-alc-1111\trb	RSM1 CEMS TROUBLE	MV	Mem			1				

01 30 minutes	02 1 hour	03 1 day	04 10 days
05 Positioning...	06 Trace Control...	07 Analyze...	08 Trace Config...
		09 Extended Config...	



DAY SHIFT OPERATOR

NAME: *BENAVIDES*

NIGHT SHIFT OPERATOR




NAME: *BENAVIDES*

PERMEATE H2O		CONCENTRATE H2O		LP		HP		SGG LP		TURBINE		GAS & ELECTRIC READINGS		BOILER TEST RESULTS	
CURRENT	PREVIOUS	TANK 1	TANK 2	% FULL	% TANK 1	% TANK 2	CHILLER HOURS	PACKSETTER ON/OFF	ALARM: RED/YELLOW/GREEN	HP RECOURSE	HP RECOURSE	HP RECOURSE	MAXON	DUCT BURNER	MEGAWATTS
7.875	12.19	218.94	3.6	21224	2.7	19.9		2.54	190	85.0	8.9	3.4	347.8	102375	1878.8
28610.45		2123488						553260		8220860		3478984	169897	169897	78333
NEW DEMIN TRAILER															
AMMONIA DELIVERY															
TURBINE															
FAV Inlet Temp: 7:00 11:00 13:00 15:00 17:00 Humidity: 7:00 5.0 8:00 4.0 9:00 3.0 10:00 2.0 11:00 1.0 12:00 0.5 Steam Injection: 2:25 1.94 2:00 2.38 2:14 2.34 2:44 2.44 2:44 2.44 2:44 2.44 2:44 2.44 2:44 2.44 Turbine L.O. Level: 85 85 85 85 85 85 85 85 85 85 85 85 85 85 85 85 154: 1420 1350 1377 1464 1479 1491 1491 1491 1491 1491 1491 1491 1491 1491 1491 1491															
GENERATOR															
Gen. Bearing Drain: 7:00 9:00 11:00 13:00 15:00 17:00 L.O. Supply: 11.9 11.9 11.9 11.9 11.9 11.9 11.9 11.9 11.9 11.9 11.9 11.9 11.9 11.9 11.9 11.9 Gen. Vibration (Max): .30 .30 .30 .30 .30 .30 .30 .30 .30 .30 .30 .30 .30 .30 .30 .30 Tie Line: 11.50 13.33 13.17 11.2 11.41 11.42 11.52 11.56 11.48 11.45 11.55 11.50 Generator Voltage: 12.82 12.84 12.85 12.82 12.81 12.81 12.81 12.81 12.81 12.81 12.81 12.81 12.81 12.81 12.81 12.81 GEN. 1180 AMPS GEN VARS 45.8 MEGA VARS GEN. 1125 AMPS GEN VARS 43.1 MEGA VARS															
COGEN BOILER															
450 Header Temp: 7:00 9:00 11:00 13:00 15:00 17:00 HP Drum Level: 7:19 7:15 7:19 7:20 7:19 7:19 7:19 7:19 7:19 7:19 7:19 7:19 7:19 7:19 7:19 7:19 LP Drum Pressure: 467 467 467 467 467 467 467 467 467 467 467 467 467 467 467 467 CO NOx: 10.3 10.1 10.8 12.8 22.1 10.8 10.8 10.8 10.8 10.8 10.8 10.8 10.8 10.8 10.8 10.8 Hot Well Level: 16.2 13.5 11.5 13.7 15.1 15.0 15.0 15.0 15.0 15.0 15.0 15.0 15.0 15.0 15.0 15.0															
COMPRESSORS															
Filter Separator: 7:00 9:00 11:00 13:00 15:00 17:00 Coa Receiver: 2.2 2.2 2.2 2.2 2.2 2.2 2.2 2.2 2.2 2.2 2.2 2.2 2.2 2.2 2.2 2.2 Frame Oil Pressure (25-50) PSI: 26-87 Temp. cooling °F: T1 T2 T1 T2 T1 T2 T1 T2 T1 T2 T1 T2 T1 T2 T1 T2															

4200 000-2011 - 00214

# New-Indy Oxnard Environmental Incident Report

Shaded section to be completed by the EMR

Name of Incident <b>PI Data Loss</b>		Incident Date <b>3/26/20</b>	
Exact Location Incident <b>Mill Wide</b>			
Reported By: <b>Zhen Han</b>		Estimated Start and Stop Times of Incident: <b>3/26/20 8:15 AM – 11:51 AM</b>	Possible Cause: <b>Date &amp; Time Change on DCS System</b>
Incident Type: <input type="checkbox"/> Spill Internal <input type="checkbox"/> Improper Waste Disposal <input type="checkbox"/> Spill External <input type="checkbox"/> Near miss or below spill release guidelines <input checked="" type="checkbox"/> Air Emission <input type="checkbox"/> Other _____		Released To <input type="checkbox"/> Storm Water System <input type="checkbox"/> Secondary Containment <input type="checkbox"/> Process Sewer <input checked="" type="checkbox"/> Air <input type="checkbox"/> Ground (External) <input type="checkbox"/> Ground (Inside Mill Property) <input type="checkbox"/> Near Miss <input type="checkbox"/> Other _____	
Detailed Description of Event: In an effort to update the Date and Time on the DCS time server, a wrong month was inadvertently placed (5/26 rather than 3/26). This is not a task that is normally done but since the mill had a paper machine outage, the Process Control Engineer capitalized on updating the time on DCS. The jump ahead by two months caused PI to error as it couldn't record time in the future. The DCS system started recording data as 5/26/2020 but lost the data prior 3/26/20 – 8:19 am. After discovery that the set the date was wrong, it was changed back immediately. This revived PI but the data on the DCS that was being recorded from –8:21 am was lost. The DCS started recording ~11:51 am on 3/26/20.			
<i>(if required use additional paper and attach)</i>			
Estimated Amount Released		pH	CONSISTENCY (%)
<input type="checkbox"/> _____ Gallons <input type="checkbox"/> _____ Pounds <input type="checkbox"/> Other _____			
		Estimated Monetary Loss	No. of Emergency Sandbags used
			<input type="checkbox"/> _____ Bags <input type="checkbox"/> N/A
List Any External Emergency Clean Up Personnel Contacted N/A		List Any External Agencies Contacted (Agency, person and time of call.) VCAPCD on 3/26/20 at 10:40 AM	
List Hueneme Personnel Contacted (Foreman, Mill Manager, etc.) Robyn Lebrilla, Sandy Robin		Any Acute or Chronic Health Risks (refer to MSDS) N/A	
Describe Any Emergency Response Actions Corrected wrong date immediately upon discovery			
Suggestions to Prevent Reoccurrence			Estimated Completion Date
1. Write up an SOP for updating date/time on DCS server			1. 3/31/2020
2.			2.
3.			3.
4.			4.
Root Cause after investigation		Severity Level (level 1 and 2 must be tracked through SHIMS)	
Human Error		<input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4	
Investigated By: <b>Troy Humphrey</b>		Investigated Date: <b>3/26/20</b>	
<u>Follow Up</u>		<u>By When</u>	<u>Completion Date</u>
Issued by  3/30/2020 Department Manager		Reviewed by  Technical Superintendent	Approved by  Mill Manager

Print Time: 3/26/2020 3:27:42 PM

Note: This document is valid for only ONE week after print time!

# NEW INDY

**CONTAINERBOARD**

May 8, 2019

Ventura County Air Pollution Control District  
669 County Square Drive, Second Floor  
Ventura, CA 93003

Attention: Ed Swede  
Subject: Invalid CEMS data

Dear Mr. Swede:

New-Indy Oxnard is submitting this follow-up report for the call made to VCAPCD Hotline by Zhen Han on May 2, 2019 at 2:43 PM.

On May 2, 2019 at 10:31 AM, the mill performed a preventive maintenance on the Continuous Emission Monitoring System (CEMS). In particular, a new O<sub>2</sub> module was installed. Initial calibration was completed by noon after the installation. At around 12:30 PM, we observed that the O<sub>2</sub> drifted to 5%. The unit was recalibrated and a successful O<sub>2</sub> calibration was completed. CEMS was stable and back online by 1:14 PM. There was no valid emission data from 10:31 AM to 1:14 PM.

The Daily Emission Sheets, PI trends, ABB trends, Cogen Daily Log, and Environmental Incident Report have been provided for your review. If you have any questions or require any additional information, please call me at (805) 271-7284.

Sincerely,



Zhen Han  
Process Engineer

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**NEW INDY OXNARD, LLC**

5936 PERKINS ROAD • OXNARD, CALIFORNIA 93033 • [WWW.NEWINDYCONTAINERBOARD.COM](http://WWW.NEWINDYCONTAINERBOARD.COM)  
PHONE (805) 986-3881 • FAX (805) 488-5186





Ventura County  
Air Pollution  
Control District

## RESPONSIBLE OFFICIAL'S CERTIFICATION FORM

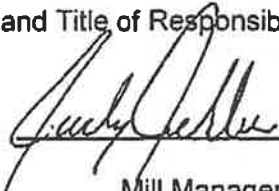
Ventura County APCD Rule 33.9 requires that "any document, including reports, schedule of compliance progress reports and compliance certifications, required by a Part 70 permit shall be certified by a responsible official." Therefore, this form shall be signed by the company's Responsible Official and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

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

### Certification by Responsible Official

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

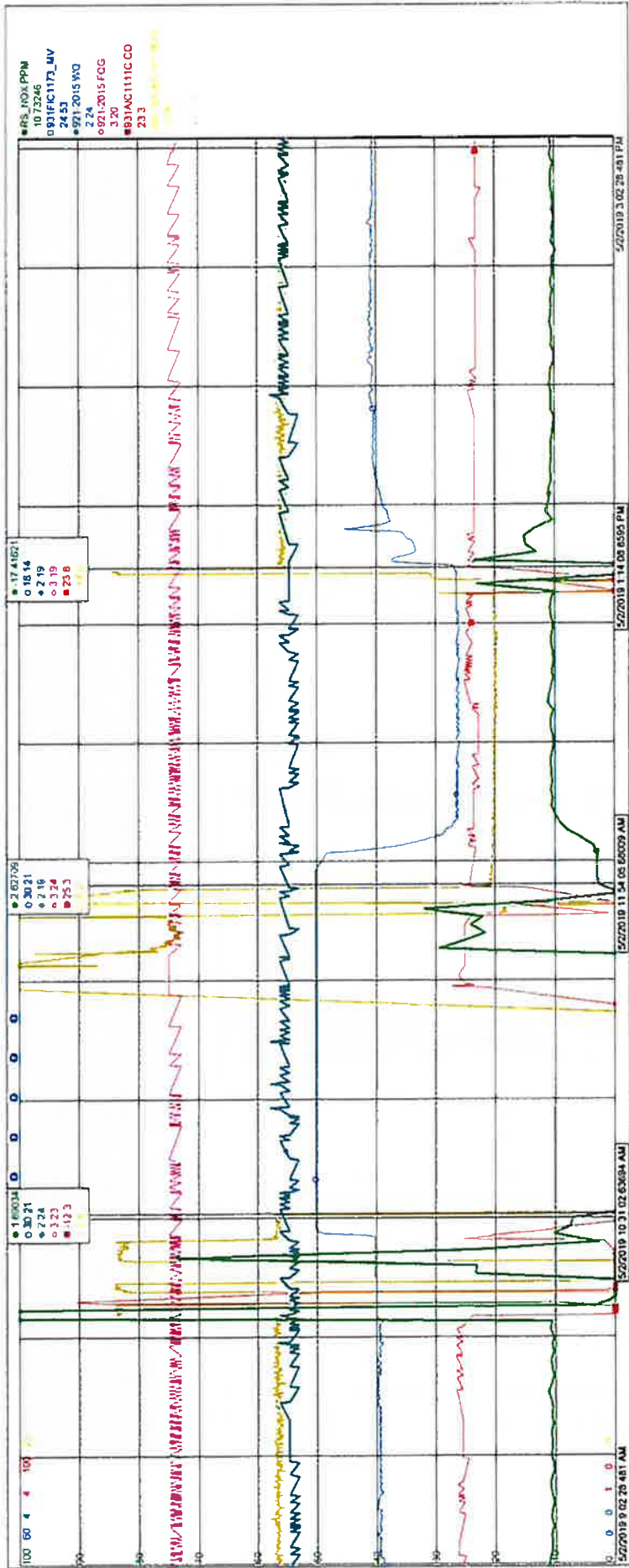
<p>Signature and Title of Responsible Official:</p> <p>Signature: <u></u></p> <p>Title: <u>Mill Manager</u></p>	<p>Date:</p> <p>5/8/2019</p>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------

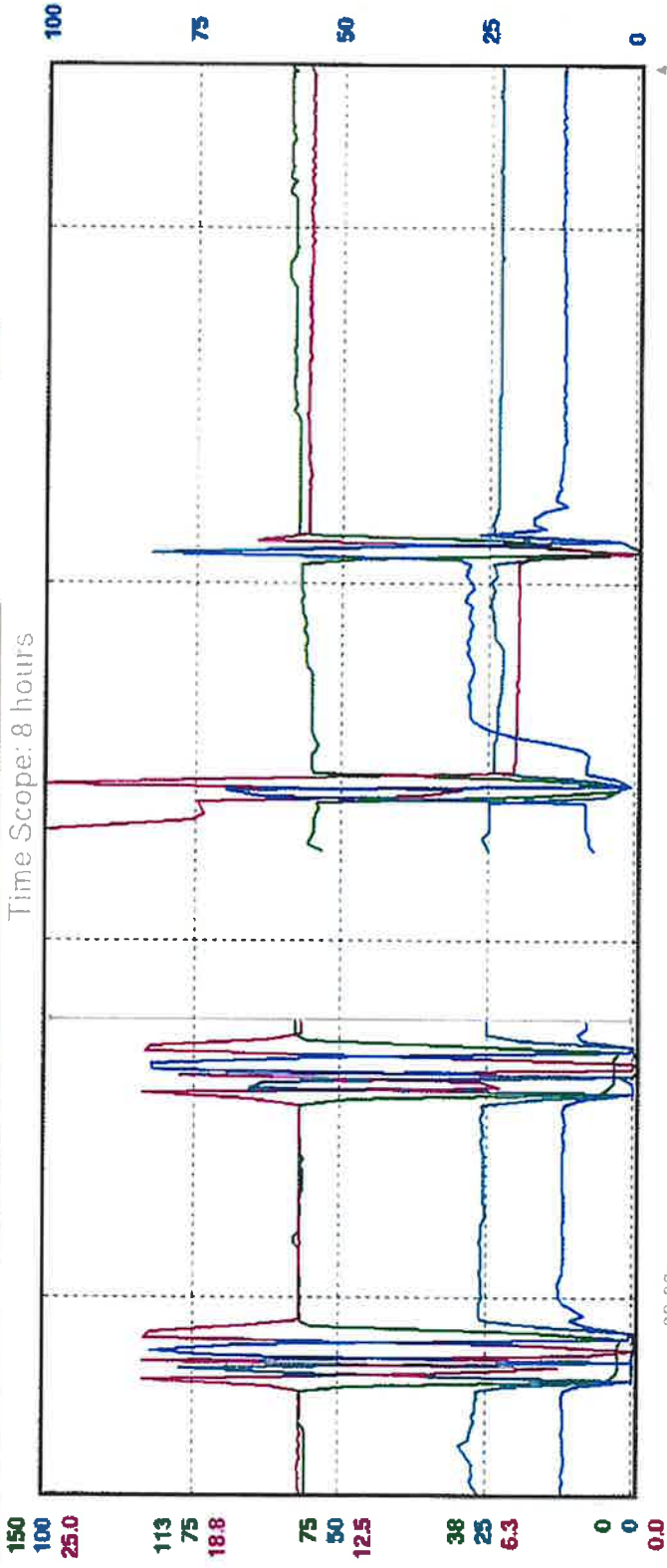
**DAILY ENVIRONMENTAL REPORT**

Date & Time	Dust/Burner MW/SCFH	Exhaust MW/SCFH	Mean/Std Dev MW/SCFH	SCFH Temperature	SCR Feed MW	Ammonia Usage lb/h	H2O MW rate/100	Exhaust Rate lb/h	Sulfur to Fuel Ratio lb/lb	NOx lb/h	Stack CO ppm	Stack CO %	Stack O2 %	Stack CO ppm	Stack NOx ppm	15% O2 ppm	18% O2 ppm	3h Running Average NOx	Intracala NOx ppm	Intracala CO %	Intracala NOx ppm	Intracala CO ppm	Intracala NOx ppm	Daily Av Cogen NOx lb/h	Daily Av Cogen CO ppm	Daily Av Cogen/NOx lb/h
11:05	265.24	3.97	3051.35	663.18	83.21	23.49	0.73	2.19	0.65	10.93	14.21	21.80	15.07	10.55	10.52	10.52	10.52	20.41	0.00	0.00	0.00	0.00	9.97	9.97	8.87	
10:54	263.97	3.92	3027.61	663.15	84.09	24.01	0.74	2.16	0.66	10.74	14.20	21.26	15.16	10.47	10.50	10.50	10.50	20.36	0.00	0.00	0.00	0.00	9.97	9.97	8.87	
10:70	264.47	3.92	3012.31	664.17	85.40	23.11	0.73	2.17	0.65	10.83	14.19	21.67	14.31	10.58	10.54	10.54	10.54	20.36	0.00	0.00	0.00	0.00	9.97	9.97	8.87	
8:75	264.30	0.00	0.00	661.54	-18.75	20.21	4.20	2.18	0.68	2.87	3.13	-3.07	-1.91	9.67	9.77	9.77	9.77	20.36	0.00	0.00	0.00	0.00	11.55	11.55	11.55	
8:74	266.01	3.35	3305.00	665.05	27.30	20.20	-0.39	2.22	0.68	9.19	20.12	4.71	5.63	9.63	9.63	9.63	9.63	20.36	0.00	0.00	0.00	0.00	11.55	11.55	11.55	
8:34	263.95	3.93	3020.46	661.62	83.62	18.76	0.55	2.18	0.66	9.58	5.06	8.81	5.43	9.63	9.63	9.63	9.63	20.36	0.00	0.00	0.00	0.00	11.55	11.55	11.55	
13:46	265.49	3.96	3355.47	659.84	89.37	24.19	0.72	2.20	0.65	11.16	13.96	20.03	12.83	10.81	10.81	10.81	10.81	20.42	0.00	0.00	0.00	0.00	9.97	9.97	8.87	
13:05	266.01	3.87	3054.74	692.05	87.70	24.53	0.72	2.22	0.65	10.91	13.92	19.69	12.49	10.45	10.45	10.45	10.45	20.44	0.00	0.00	0.00	0.00	9.97	9.97	8.87	
11:19	266.35	3.95	3058.34	690.19	86.13	24.32	0.72	2.22	0.65	10.90	13.85	19.48	12.42	10.56	10.56	10.56	10.56	20.46	0.00	0.00	0.00	0.00	9.97	9.97	8.87	
8:51	266.18	3.45	3331.54	665.74	89.55	24.44	0.71	2.21	0.65	10.84	13.84	19.67	11.61	10.55	10.55	10.55	10.55	20.47	0.00	0.00	0.00	0.00	9.97	9.97	8.87	
10:29	268.52	0.00	0.00	689.82	90.20	24.81	0.72	2.23	0.68	10.88	13.78	17.41	11.03	10.51	10.51	10.51	10.51	20.42	0.00	0.00	0.00	0.00	9.97	9.97	8.87	
8:02	268.18	0.95	974.17	688.46	86.75	23.73	0.71	2.23	0.66	10.78	13.86	18.08	11.16	10.48	10.48	10.48	10.48	20.34	0.00	0.00	0.00	0.00	9.97	9.97	8.87	
6:03	268.35	3.99	3077.69	682.59	88.18	23.73	0.71	2.23	0.66	10.73	13.86	18.08	11.16	10.48	10.48	10.48	10.48	20.34	0.00	0.00	0.00	0.00	9.97	9.97	8.87	
10:30	266.01	3.98	3071.69	684.57	87.14	23.60	0.71	2.20	0.68	10.70	13.82	19.73	12.38	10.43	10.43	10.43	10.43	20.33	0.00	0.00	0.00	0.00	9.97	9.97	8.87	
10:41	268.01	3.98	3064.62	688.12	86.13	22.94	0.69	2.21	0.68	10.84	13.85	20.77	13.15	10.68	10.68	10.68	10.68	20.36	0.00	0.00	0.00	0.00	9.97	9.97	8.87	
10:27	266.52	3.92	3015.11	685.84	86.14	22.79	0.69	2.22	0.69	10.89	13.82	20.77	13.15	10.68	10.68	10.68	10.68	20.36	0.00	0.00	0.00	0.00	9.97	9.97	8.87	
8:43	265.97	3.69	3786.20	682.65	85.17	22.45	0.69	2.22	0.68	10.89	13.82	20.77	13.15	10.68	10.68	10.68	10.68	20.36	0.00	0.00	0.00	0.00	9.97	9.97	8.87	
7:55	265.75	3.67	3700.20	690.00	84.86	22.36	0.69	2.21	0.68	10.82	13.90	20.44	12.77	10.54	10.54	10.54	10.54	20.37	0.00	0.00	0.00	0.00	9.97	9.97	8.87	
8:03	265.96	2.14	2099.52	680.18	85.59	22.34	0.68	2.20	0.68	10.72	13.90	19.92	12.36	10.48	10.48	10.48	10.48	20.37	0.00	0.00	0.00	0.00	9.97	9.97	8.87	
8:03	264.96	3.84	3851.44	677.18	84.97	22.17	0.68	2.19	0.68	10.69	13.83	20.24	12.49	10.48	10.48	10.48	10.48	20.36	0.00	0.00	0.00	0.00	9.97	9.97	8.87	
8:34	265.49	3.84	3545.19	678.20	84.74	22.20	0.69	2.21	0.69	10.71	13.88	20.56	12.84	10.44	10.44	10.44	10.44	20.37	0.00	0.00	0.00	0.00	9.97	9.97	8.87	
8:26	264.64	3.95	3850.87	679.54	84.76	22.25	0.69	2.19	0.68	10.77	13.80	21.48	13.41	10.53	10.49	10.49	10.49	20.38	0.00	0.00	0.00	0.00	9.97	9.97	8.87	
10:55	264.64	3.96	3850.81	678.84	84.56	22.13	0.69	2.19	0.68	10.68	13.87	22.25	14.00	10.55	10.50	10.50	10.50	20.38	0.00	0.00	0.00	0.00	9.97	9.97	8.87	
7:03	263.44	1.20	1212.95	670.98	84.94	22.13	0.70	2.18	0.68	10.67	13.91	20.87	13.03	10.51	10.51	10.51	10.51	20.34	0.00	0.00	0.00	0.00	9.97	9.97	8.87	

**Comments** CEMS maintenance was completed on 5/2/19 from 10:31 AM to 11:54 AM. O2 module was replaced. O2 drifted to 5% after initial calibration. A successful calibration was completed by 1:14 PM. Cogen emission data was not valid until 1:14 PM. VCAPCD was notified by Zhen Han at 2:43 PM.

**PRINT TIME:** 5/2/2019 9:50 AM  
**NOTE:** This document is valid ( ) ONE week after print time





09:00  
2019-05-02

ION Name	Description	Attribute	Treatment	Ruler Time	Ruler Value	Current Value	Unit	Filter	Time Offset	Form
931AIC1111A.NOX	BAW SCR INLET NOX	MV	Mem	10:32	---	88.02	PPM			
931AIC1111C.CO	BAW BLR STACK RAW CO	MV	Mem	10:32	---	23.25	PPM			
931AIC1111B.O2	BAW BLR RAW O2%	MV	Mean	10:32	---	18.84	%			
931AIC1111D.NOX	BAW BLR STACK NOX	MV	Mean	10:32	---	12.41	PPM			
931-AIC-1111INCAL	RSMT CEMS IN CAL	MV	Mem	---	---	0				
931-alc-1111.trb	RSMT CEMS TROUBLE	MV	Mem	---	---	1				

30 minutes

Positioning...

1 hour

Trace Control...

8 hours

Analyze...

1 day

Trace Config...

10 days

Extended Config...



WARRANT PREVIOUS		PERMEATE H <sub>2</sub> O		CONCENTRATE H <sub>2</sub> O		LP		HP		SCG LP		TURBINE		GAS & ELECTRIC READINGS		BOILER TEST RESULTS		MEGAWATT	
904	757	904	757	859	1542	209	149	1900	1900	610	400	871	50	216	172	230	45	0.28	0.28
904	1374	859	1542	209	149	1900	1900	610	400	871	50	216	172	230	45	0.28	0.28	0.28	0.28
NEW DESIM TRAILER	YES	NO	TANK 1	%	TANK 2	%	CHILLER HOURS	PACESETTER (ON) / OFF	ALARM: RED	YELLOW	GREEN	BOILER FEED WATER	PH 8.75-9.5	Conductivity <20mmhos	Silica <20 ppb	R.O.	Feed 105<1000 ppm	Permeate 105<10 ppm	PH (Feas 7.5)
AMMONIA DELIVERY	YES	NO	TANK 1	%	TANK 2	%	CHILLER HOURS	PACESETTER (ON) / OFF	ALARM: RED	YELLOW	GREEN	BOILER FEED WATER	PH 8.75-9.5	Conductivity <20mmhos	Silica <20 ppb	R.O.	Feed 105<1000 ppm	Permeate 105<10 ppm	PH (Feas 7.5)
TURBINE																			
BATTERIES 12.2.5 V HP RECOUPE 1477 1473 1472 1473 AIR INLET DIFF 2.1 (W/HP) HP RECOUPE 1477 1473 1472 1473 FAR AIR INLET DIFF 2.17 IN (H/HP) HP RECOUPE 1477 1473 1472 1473 AT L.O. DIFFERENTIAL 5 PSI HP RECOUPE 1477 1473 1472 1473 BOILER FEED WATER NO. 100.0 100.0 100.0 100.0 CONDENSATE 1477 1473 1472 1473 HP-PT 8.5-9.5 CONDUCTIVITY <20mmhos PH 9.5-10.5 CONDUCTIVITY 75-150 PHOSPHATE 5-15 ppm SILICA <5 ppm IRON ppm LP PH 9.5-10.5 CONDUCTIVITY 75-150 PHOSPHATE 5-15 ppm SILICA <5 ppm IRON ppm MIXED BED PH 6.0-7.5 CONDUCTIVITY <10mmhos SILICA <10 ppb HP STEAM TEST SILICA <20 ppb SOFTENER HARDNESS <1.0 ppm RUNNING (1 or 2) STEAM TEST PH SILICA <20 ppb PV NO.2 HP BLOW DOWN TIME: DAY SHIFT: 07:15 NORTH TANK 5 FEET SOUTH TANK 5 FEET NOTES: CHANKE OAT DEMA BOTTLES 450801001																			
GENERATOR																			
GEN 1 500 AMPS GEN VARS 3.7 MEGA VARS GEN 1150 AMPS GEN VARS 3.7 MEGA VARS FIELD 910 COOLING TWR INLET 17.00 17.00 17.00 17.00 COOLING TWR OUTLET 16.5 16.5 16.5 16.5 FIELD 140 VI FIELD 140 450 Header Temp 'F 709 704 710 710 HP Drum Level IN 0.9 0.9 0.5 0.5 LP Drum Level IN 0.3 0.3 0.2 0.2 HP Drum Pressure PSI 475 403 476 474 LP Drum Pressure PSI 152 152 152 152 CO PPM 27.9 22.3 0 0 NOx PPM 10.8 10.7 A L 4.9 10.3 10.5 10.9 10.6 11.0 10.6 10.7 O <sub>2</sub> % 14.21 14.24 14.7 15.1 15.7 15.3 15.4 15.2 15.4 15.2 15.4 15.4 15.4 15.4 15.4 15.4 15.4 15.4 15.4 15.4 Hot Well Level % 8.00 10.00 12.00 14.00 16.00 18.00 20.00 22.00 24.00 26.00 28.00 30.00 32.00 34.00 36.00 38.00 40.00 42.00 44.00 46.00 450 Header Temp 'F 710 710 710 710 HP Drum Level IN 1.2 1.3 1.4 1.4 LP Drum Level IN 0.5 0.5 0.5 0.5 HP Drum Pressure PSI 152 152 152 152 LP Drum Pressure PSI 10.0 10.0 10.0 10.0 NOx PPM 14.22 14.24 14.24 14.24 Hot Well Level % 1.50 1.50 1.50 1.50 AUTO / ON / OFF DUCT BURNER 1150 SET POINT 451 1103 B SET POINT 446 1150 SET POINT 446 1103 B SET POINT 446 DUCT BURNER 446 Filter Separator PSI 225 225 225 225 Car Receiver PSI 415 415 415 415 Crankcase Oil Level % 60 Frame Oil Pressure (25-50) PSI 26.56 Temp. cooling 'F T1 T2 Frame Oil Pressure (25-50) PSI 26.81 Temp. cooling 'F T1 T2																			
COGEN BOILER																			
GEN 1 500 AMPS GEN VARS 3.7 MEGA VARS GEN 1150 AMPS GEN VARS 3.7 MEGA VARS FIELD 910 COOLING TWR INLET 17.00 17.00 17.00 17.00 COOLING TWR OUTLET 16.5 16.5 16.5 16.5 FIELD 140 VI FIELD 140 450 Header Temp 'F 709 704 710 710 HP Drum Level IN 0.9 0.9 0.5 0.5 LP Drum Level IN 0.3 0.3 0.2 0.2 HP Drum Pressure PSI 475 403 476 474 LP Drum Pressure PSI 152 152 152 152 CO PPM 27.9 22.3 0 0 NOx PPM 10.8 10.7 A L 4.9 10.3 10.5 10.9 10.6 11.0 10.6 10.7 O <sub>2</sub> % 14.21 14.24 14.7 15.1 15.7 15.3 15.4 15.2 15.4 15.2 15.4 15.4 15.4 15.4 15.4 15.4 15.4 15.4 15.4 15.4 Hot Well Level % 8.00 10.00 12.00 14.00 16.00 18.00 20.00 22.00 24.00 26.00 28.00 30.00 32.00 34.00 36.00 38.00 40.00 42.00 44.00 46.00 450 Header Temp 'F 710 710 710 710 HP Drum Level IN 1.2 1.3 1.4 1.4 LP Drum Level IN 0.5 0.5 0.5 0.5 HP Drum Pressure PSI 152 152 152 152 LP Drum Pressure PSI 10.0 10.0 10.0 10.0 NOx PPM 14.22 14.24 14.24 14.24 Hot Well Level % 1.50 1.50 1.50 1.50 AUTO / ON / OFF DUCT BURNER 1150 SET POINT 451 1103 B SET POINT 446 1150 SET POINT 446 1103 B SET POINT 446 DUCT BURNER 446 Filter Separator PSI 225 225 225 225 Car Receiver PSI 415 415 415 415 Crankcase Oil Level % 60 Frame Oil Pressure (25-50) PSI 26.56 Temp. cooling 'F T1 T2 Frame Oil Pressure (25-50) PSI 26.81 Temp. cooling 'F T1 T2																			
COMPRESSORS																			
GEN 1 500 AMPS GEN VARS 3.7 MEGA VARS GEN 1150 AMPS GEN VARS 3.7 MEGA VARS FIELD 910 COOLING TWR INLET 17.00 17.00 17.00 17.00 COOLING TWR OUTLET 16.5 16.5 16.5 16.5 FIELD 140 VI FIELD 140 450 Header Temp 'F 709 704 710 710 HP Drum Level IN 0.9 0.9 0.5 0.5 LP Drum Level IN 0.3 0.3 0.2 0.2 HP Drum Pressure PSI 475 403 476 474 LP Drum Pressure PSI 152 152 152 152 CO PPM 27.9 22.3 0 0 NOx PPM 10.8 10.7 A L 4.9 10.3 10.5 10.9 10.6 11.0 10.6 10.7 O <sub>2</sub> % 14.21 14.24 14.7 15.1 15.7 15.3 15.4 15.2 15.4 15.2 15.4 15.4 15.4 15.4 15.4 15.4 15.4 15.4 15.4 15.4 Hot Well Level % 8.00 10.00 12.00 14.00 16.00 18.00 20.00 22.00 24.00 26.00 28.00 30.00 32.00 34.00 36.00 38.00 40.00 42.00 44.00 46.00 450 Header Temp 'F 710 710 710 710 HP Drum Level IN 1.2 1.3 1.4 1.4 LP Drum Level IN 0.5 0.5 0.5 0.5 HP Drum Pressure PSI 152 152 152 152 LP Drum Pressure PSI 10.0 10.0 10.0 10.0 NOx PPM 14.22 14.24 14.24 14.24 Hot Well Level % 1.50 1.50 1.50 1.50 AUTO / ON / OFF DUCT BURNER 1150 SET POINT 451 1103 B SET POINT 446 1150 SET POINT 446 1103 B SET POINT 446 DUCT BURNER 446 Filter Separator PSI 225 225 225 225 Car Receiver PSI 415 415 415 415 Crankcase Oil Level % 60 Frame Oil Pressure (25-50) PSI 26.56 Temp. cooling 'F T1 T2 Frame Oil Pressure (25-50) PSI 26.81 Temp. cooling 'F T1 T2																			

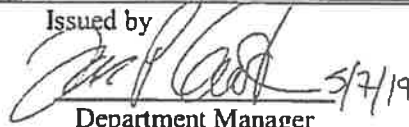

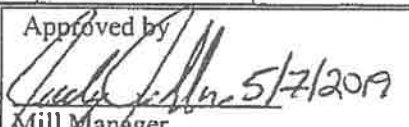
NIGHT SHIFT OPERATOR

DAY SHIFT OPERATOR

4509 000-201 - 00144

## New-Indy Oxnard Environmental Incident Report

Shaded section to be completed by the EMR

Name of Incident O2 Analyzer Maintenance		Incident Date 5/2/19	
Exact Location Incident Cogen			
Reported By: Gary Uribe		Estimated Start and Stop Times of Incident: 10:31 AM - 1:14 PM	Possible Cause: Changed O2 Module in Rosemount Analyzer.
Incident Type: <input type="checkbox"/> Spill Internal <input type="checkbox"/> Improper Waste Disposal <input type="checkbox"/> Spill External <input type="checkbox"/> Near miss or below spill release guidelines <input checked="" type="checkbox"/> Air Emission <input type="checkbox"/> Other _____		Released To <input type="checkbox"/> Storm Water System <input type="checkbox"/> Secondary Containment <input type="checkbox"/> Process Sewer <input checked="" type="checkbox"/> Air <input type="checkbox"/> Ground (External) <input type="checkbox"/> Ground (Inside Mill Property) <input type="checkbox"/> Near Miss <input type="checkbox"/> Other _____	
Detailed Description of Event O2 module for Rosemount analyzer was replaced starting at 10:31 am, initial calibration was finished by noon. After the initial calibration analyzer drifted 5% as unit was warming up. Unit was recalibrated after warm-up and was back on line by 1:14 pm. Unit has been running and calibrating properly since. (if required use additional paper and attach)			
Estimated Amount Released		pH	CONSISTENCY (%)
<input type="checkbox"/> _____ Gallons <input type="checkbox"/> _____ Pounds <input type="checkbox"/> Other _____			
List Any External Emergency Clean Up Personnel Contacted N/A		List Any External Agencies Contacted (Agency, person and time of call.) VCAPCD, Zhen Han, 2:43 PM	
List Hueneme Personnel Contacted (Foreman, Mill Manager, etc.) Robyn Lebrilla		Any Acute or Chronic Health Risks (refer to MSDS) N/A	
Describe Any Emergency Response Actions Replaced unit was monitored after calibration and recalibrated after it stabilized.			
Suggestions to Prevent Reoccurrence			Estimated Completion Date
1. Continue to monitor analyzers after replacement to verify unit has warmed up and is stable.			1. Problem resolved
2.			2.
3.			3.
4.			4.
Root Cause after investigation Proactive monitoring of new analyzer allowed tech to capture warm up drift and resolve.		Severity Level (level 1 and 2 must be tracked through SHIMS) <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4	
Investigated By Gary Uribe		Investigated Date: 5/2/19	
<u>Follow Up</u>		<u>By When</u>	<u>Completion Date</u>
Issued by  Department Manager	Reviewed by  Technical Superintendent	Approved by  Mill Manager	

Print Time: 5/7/2019 5:31:51 PM

Note: This document is valid for only ONE week after print time!

# NEW INDY

CONTAINERBOARD

May 24, 2019

Ed Swede  
Ventura County Air Pollution Control District  
669 County Square Drive, Second Floor  
Ventura, CA 93003

Subject: PI data loss

Dear Mr. Swede:

New-Indy Oxnard is submitting this follow-up report for the call made to VCAPCD Breakdown Center Hotline by Zhen Han on May 21, 2019 at 11:16 AM and Robyn Lebrilla's call to your office on May 22, 2019 at 8:58 AM.

On May 21, 2019, the mill scheduled a maintenance on the server. IT had to move all virtual servers from two load balanced ESXI server hosts to one ESXI server host. However, the host holding all the servers began dropping connections randomly causing PI data loss. The issue was resolved by migrating the servers back to two hosts and rebooting the hosts. On May 22, 2019, the mill had a network connection drop again. Investigation followed and it was found that the network interface card (NIC) software driver on the host was corrupted. Updating the NIC software had resolved the issue.

There were no valid PI data on May 21 from 8:51 AM to 1:29 PM and on May 22 from 6:53 AM to 7:15 AM, a total of 2.93 hours. Please note that the ABB DCS emission data were intact, which reflect that there were no excess emissions during this period.

The Daily Emission Sheet, PI trend, ABB trend, Cogen Daily Log and Environmental Incident Report have been provided for your review. If you have any questions or require any additional information, please call me at (805) 271-7271.

Sincerely,



Zhen Han  
Process Engineer

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**NEW INDY OXNARD, LLC**

5936 PERKINS ROAD • OXNARD, CALIFORNIA 93033 • [WWW.NEWINDYCONTAINERBOARD.COM](http://WWW.NEWINDYCONTAINERBOARD.COM)  
PHONE (805) 986-3881 • FAX (805) 488-5186



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:

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

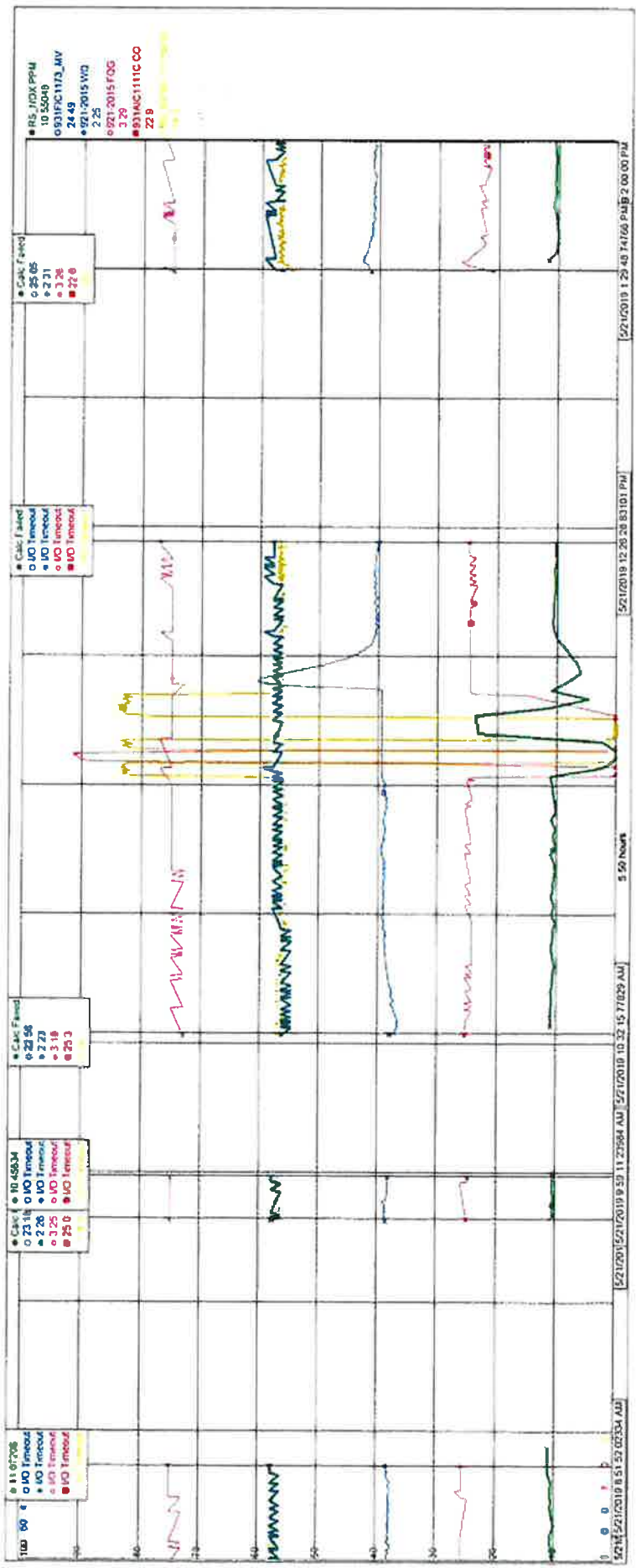
### Certification by Responsible Official

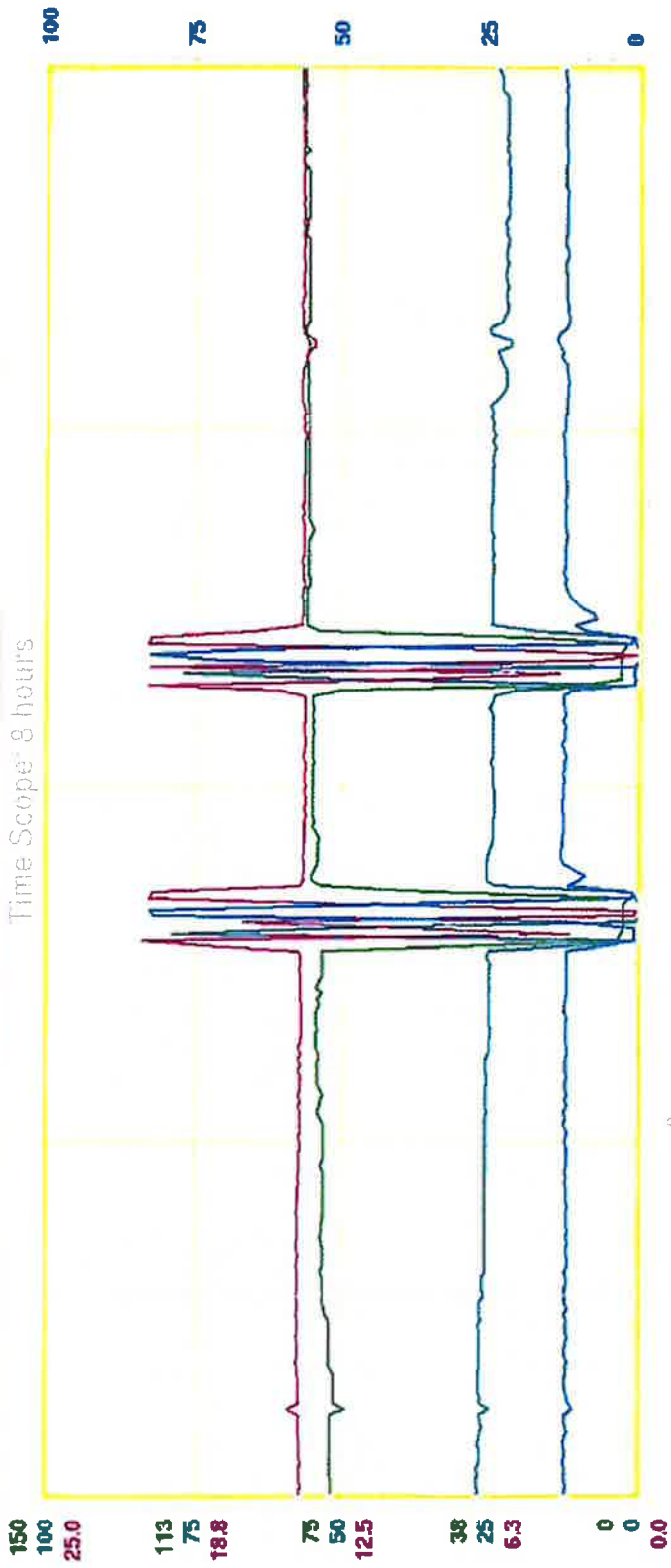
I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this document is true, accurate, and complete.

<p>Signature and Title of Responsible Official:</p> <p>Signature: <u></u></p> <p>Title: <u>Technical Manager</u></p>	<p>Date:</p> <p>5/23/19</p>
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DM Name	Description	Attribute	Treatment	Ruler Time	Ruler Value	Current Value	Unit	Filter	Time Offset	Form
001AIC1111A.NOX	B&W SCR INLET NOX	MV	Mem	00:08 2018-05-21	79.76	63.77	PPM			
001AIC1111C.CO	B&W BLR STACK RAW CO	MV	Mem	00:08 2018-05-21	25.59	22.72	PPM			
001AIC1111B.O2	B&W BLR RAW O2%	MV	Mean	00:08 2018-05-21	14.41	14.27	%			
001AIC1111D.NOX	B&W BLR STACK NOX	MV	Mean	00:08 2018-05-21	11.95	11.72	PPM			
001-AIC-1111A.CAL	RSMT CEMS IN CAL	MV	Mem			0				Current Time
001-AIC-1111A.tb	RSMT CEMS TROUBLE	MV	Mem			0				Save Trend... Hide Table

01 30 minutes 02 1 hour 03 6 hours 04 1 day 05 10 days  
06 Positioning... 07 Trace Control... 08 Analyze... 09 Trace Config... 10 Extended Config...

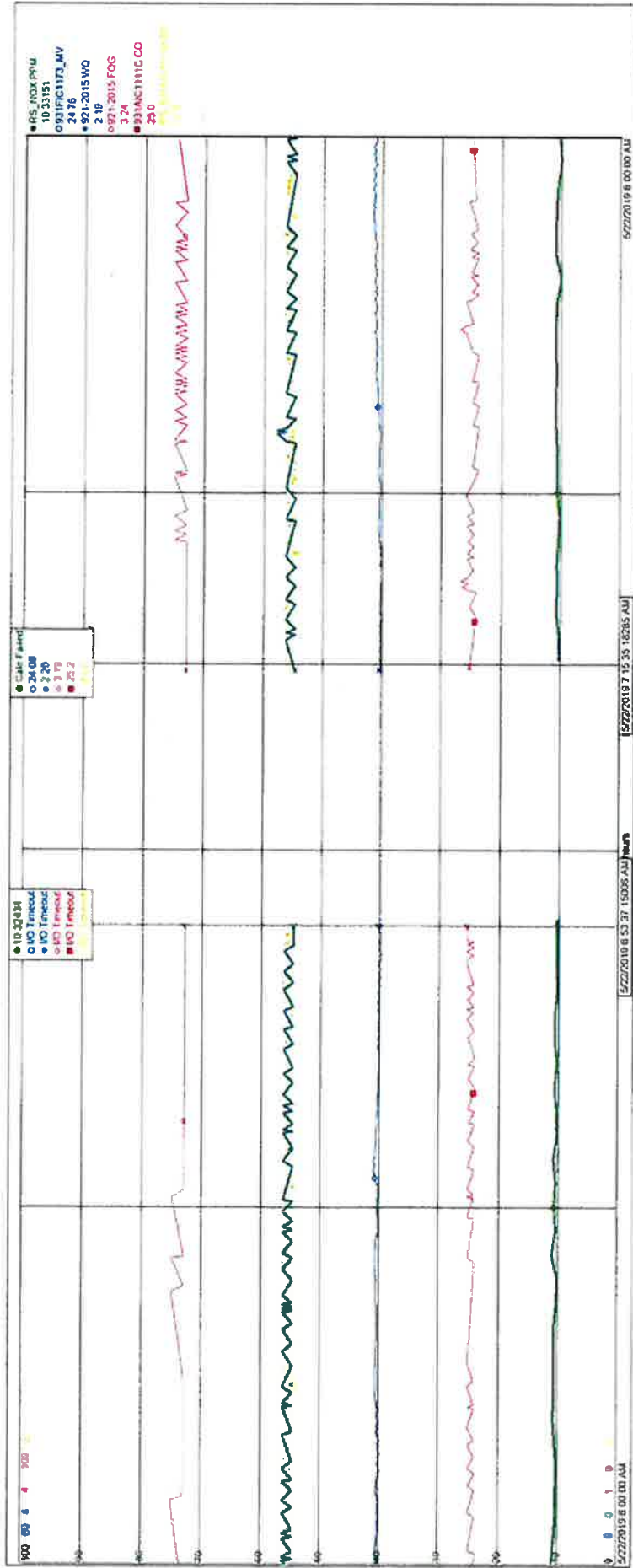


CURRENT		PREVIOUS		NEW DEWH TRAILER		AMMONIA DELIVERY		STEAM & WATER READINGS				GAS & ELECTRIC READINGS				BOILER TEST RESULTS											
PERMEATE H <sub>2</sub> O		CONCENTRATE H <sub>2</sub> O		UP		HP		SCG LP		TURBINE		MAXION		DUCT BURNER		MEGAWATTS											
9256575		863850		210787		2102		6297320		5083680		2174588		569000		13743											
9246371		8629094		211541		1978		6216500		4702240		2173354		290403		13188											
YES <input type="checkbox"/> NO <input type="checkbox"/>		TANK 1		TANK 2		CHILLER HOURS:		PAGESETER		ALARM: RED		YELLOW		GREEN		DAY SHIFT		NIGHT SHIFT									
YES <input type="checkbox"/> NO <input type="checkbox"/>		% FULL: 59						19:00		21:00		23:00		1:00		3:00		5:00									
TURBINE		FMV		7:00		9:00		11:00		13:00		15:00		17:00		19:00		21:00		23:00		1:00		3:00		5:00	
Inlet Temp		41.2		51.50		50.94		50.94		50.94		50.94		50.94		49.12		49.12		49.12		49.12		49.12		49.12	
Humidity		61.8		47.5		43.8		38.2		38.2		38.2		38.2		38.2		38.2		38.2		38.2		38.2		38.2	
Vibration (Max)		0.65		0.64		0.64		0.64		0.64		0.64		0.64		0.64		0.64		0.64		0.64		0.64		0.64	
Steam Injection		2.19		2.21		2.21		2.25		2.25		2.25		2.25		2.25		2.25		2.25		2.25		2.25		2.25	
Turbine L.O. Level		80		80		80		80		80		80		80		80		80		80		80		80		80	
T54		1460		1469		1473		1478		1478		1478		1478		1478		1478		1478		1478		1478		1478	
BATTERIES		123.3		123.3		123.3		123.3		123.3		123.3		123.3		123.3		123.3		123.3		123.3		123.3		123.3	
AIR INLET DIFF		2.20		2.20		2.20		2.20		2.20		2.20		2.20		2.20		2.20		2.20		2.20		2.20		2.20	
L.O. DIFFERENTIAL		5		5		5		5		5		5		5		5		5		5		5		5		5	
CHAMK		YES <input type="checkbox"/> NO <input type="checkbox"/>		YES <input type="checkbox"/> NO <input type="checkbox"/>		YES <input type="checkbox"/> NO <input type="checkbox"/>		YES <input type="checkbox"/> NO <input type="checkbox"/>		YES <input type="checkbox"/> NO <input type="checkbox"/>		YES <input type="checkbox"/> NO <input type="checkbox"/>		YES <input type="checkbox"/> NO <input type="checkbox"/>		YES <input type="checkbox"/> NO <input type="checkbox"/>		YES <input type="checkbox"/> NO <input type="checkbox"/>		YES <input type="checkbox"/> NO <input type="checkbox"/>		YES <input type="checkbox"/> NO <input type="checkbox"/>		YES <input type="checkbox"/> NO <input type="checkbox"/>		YES <input type="checkbox"/> NO <input type="checkbox"/>	
GEN. BEARING DRAIN		153		154		154		154		154		154		154		154		154		154		154		154		154	
L.O. SUPPLY		12.0		12.1		12.1		12.2		12.2		12.2		12.2		12.2		12.2		12.2		12.2		12.2		12.2	
GEN. VIBRATION (MAX)		0.35		0.36		0.36		0.36		0.36		0.36		0.36		0.36		0.36		0.36		0.36		0.36		0.36	
THE LINE		11.50		11.66		11.63		11.53		11.53		11.53		11.53		11.53		11.53		11.53		11.53		11.53		11.53	
GENERATOR VOLTAGE		KV		KV		KV		KV		KV		KV		KV		KV		KV		KV		KV		KV		KV	
GEN. 1		3.0		3.4		3.4		3.4		3.4		3.4		3.4		3.4		3.4		3.4		3.4		3.4		3.4	
FIELD		18.9		16.5		16.5		16.5		16.5		16.5		16.5		16.5		16.5		16.5		16.5		16.5		16.5	
COOLING TWR INLET		7:00		9:00		11:00		13:00		15:00		17:00		19:00		21:00		23:00		1:00		3:00		5:00		7:00	
450 HEADER TEMP		F		F		F		F		F		F		F		F		F		F		F		F		F	
HP DRUM LEVEL		IN		IN		IN		IN		IN		IN		IN		IN		IN		IN		IN		IN		IN	
HP DRUM PRESSURE		PSI		PSI		PSI		PSI		PSI		PSI		PSI		PSI		PSI		PSI		PSI		PSI		PSI	
LP DRUM PRESSURE		PPM		PPM		PPM		PPM		PPM		PPM		PPM		PPM		PPM		PPM		PPM		PPM		PPM	
NOX		%		%		%		%		%		%		%		%		%		%		%		%		%	
HOT WELL LEVEL		%		%		%		%		%		%		%		%		%		%		%		%		%	
450 HEADER TEMP		F		F		F		F		F		F		F		F		F		F		F		F		F	
HP DRUM LEVEL		IN		IN		IN		IN		IN		IN		IN		IN		IN		IN		IN		IN		IN	
HP DRUM PRESSURE		PSI		PSI		PSI		PSI		PSI		PSI		PSI		PSI		PSI		PSI		PSI		PSI		PSI	
LP DRUM PRESSURE		PPM		PPM		PPM		PPM		PPM		PPM		PPM		PPM		PPM		PPM		PPM		PPM		PPM	
NOX		%		%		%		%		%		%		%		%		%		%		%		%		%	
HOT WELL LEVEL		%		%		%		%		%		%		%		%		%		%		%		%		%	
AUTO / ON / OFF		S/P		S/P		S/P		S/P		S/P		S/P		S/P		S/P		S/P		S/P		S/P		S/P		S/P	
FILTER SEPARATOR		PSI		PSI		PSI		PSI		PSI		PSI		PSI		PSI		PSI		PSI		PSI		PSI		PSI	
GAS RECEIVER		PSI		PSI		PSI		PSI		PSI		PSI		PSI		PSI		PSI		PSI		PSI		PSI		PSI	
CRANKCASE OIL LEVEL		%		%		%		%		%		%		%		%		%		%		%		%		%	
FRAME OIL PRESSURE		PSI		PSI		PSI		PSI		PSI		PSI		PSI		PSI		PSI		PSI		PSI		PSI		PSI	
TEMP. COOLING		F		F		F		F		F		F		F		F		F		F		F		F		F	
TEMP. COOLING		F		F		F		F		F		F		F		F		F		F		F		F		F	

DAILY ENVIRONMENTAL REPORT

Time	5/23/2019 7:00			5/22/2019 7:00			5/22/2019 7:00			5/22/2019 7:00			5/22/2019 7:00			5/22/2019 7:00			5/22/2019 7:00			5/22/2019 7:00			
	Duct Burner Gas Flow kgSCFH	Turbine Gas Flow kgSCFH	Mass Burner Gas Flow kgSCFH	SCR Temperature °F	SCR Inlet NOx ppm	Ammonia Usage lb/h	NOx/NO2 mass ratio	Injection steam rate lb/h	Steam to fuel ratio lb/h	NOx lb/h	Stack CO ppm	Stack CO ppm	Stack CO ppm	Stack CO ppm	Stack CO ppm	Stack CO ppm	Stack CO ppm	Stack CO ppm	Stack CO ppm	Stack CO ppm	Stack CO ppm	Stack CO ppm	Stack CO ppm	Stack CO ppm	
8 00	22.77	207.35	3.90	703.02	83.00	24.46	0.74	2.22	0.70	11.32	13.91	21.00	13.59	10.69	19.82	18.28	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
9 00	22.17	203.19	3.81	703.90	84.01	25.13	0.76	2.24	0.70	11.30	13.92	20.52	13.28	10.57	19.75	19.35	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
10 00	20.81	205.32	3.89	710.24	85.84	25.99	0.75	2.26	0.70	11.49	13.90	19.34	12.78	10.51	19.56	19.32	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
11 00	23.77	200.35	3.90	709.48	85.32	25.00	0.75	2.29	0.71	11.39	13.83	19.00	12.82	10.53	19.54	19.32	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
12 00	23.67	205.84	3.97	709.14	85.07	25.79	0.75	2.28	0.70	11.40	13.87	19.00	12.52	10.50	19.51	19.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
13 00	22.01	208.01	3.94	707.24	84.24	25.62	0.76	2.29	0.71	11.37	13.90	18.55	12.76	10.44	19.49	19.35	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
14 00	20.87	208.35	3.94	707.23	84.24	25.71	0.76	2.29	0.71	11.36	13.93	18.77	12.77	10.41	19.49	19.31	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
15 00	17.49	205.00	2.31	699.82	87.84	24.95	0.76	2.28	0.70	11.04	14.03	20.29	13.02	10.40	19.45	19.34	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
16 00	7.17	200.18	2.03	683.50	83.00	25.00	0.70	2.28	0.70	10.89	14.22	19.61	12.28	10.45	19.45	19.36	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
17 00	14.56	205.24	4.07	691.24	83.14	24.80	0.77	2.28	0.70	11.00	14.09	20.70	13.25	10.48	19.45	19.34	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
18 00	15.59	206.18	4.03	694.85	82.26	24.40	0.76	2.28	0.70	11.11	14.01	20.00	13.20	10.45	19.46	19.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
19 00	18.22	206.18	4.03	691.81	82.53	24.93	0.77	2.28	0.70	11.05	14.07	21.10	13.82	10.48	19.45	19.32	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
20 00	15.37	205.49	4.02	691.51	81.04	24.37	0.76	2.27	0.70	11.01	14.11	21.37	13.82	10.48	19.45	19.32	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
21 00	10.51	204.81	0.19	687.19	81.45	24.09	0.71	2.27	0.70	10.90	14.21	20.90	13.19	10.57	19.45	19.28	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
22 00	7.27	205.32	0.00	689.85	83.87	24.82	0.79	2.27	0.70	10.75	14.28	20.31	12.83	10.57	19.53	19.27	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
23 00	13.65	208.35	0.00	687.78	81.43	24.08	0.76	2.29	0.71	10.97	14.18	21.96	14.11	10.47	19.53	19.27	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0 00	18.35	205.24	0.00	692.78	80.17	23.34	0.75	2.26	0.70	11.08	14.19	22.00	14.70	10.49	19.50	19.22	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1 00	14.43	203.78	0.00	689.39	79.30	27.68	0.75	2.26	0.70	10.91	14.25	22.03	14.69	10.47	19.49	19.24	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2 00	13.90	205.75	0.00	689.78	78.92	22.45	0.73	2.29	0.70	10.87	14.23	23.06	14.71	10.48	19.48	19.22	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3 00	13.51	204.73	0.00	688.49	77.61	22.00	0.73	2.27	0.70	10.83	14.26	23.03	14.61	10.48	19.48	19.24	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4 00	9.31	203.79	0.00	678.22	76.65	21.55	0.74	2.25	0.70	10.78	14.38	23.25	14.55	10.57	19.49	19.29	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
5 00	6.84	201.74	0.00	671.23	75.71	21.02	0.75	2.23	0.70	10.58	14.45	23.90	14.48	10.49	19.50	19.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
6 00	6.87	203.53	0.00	671.59	75.82	21.40	0.76	2.25	0.70	10.81	14.42	23.36	14.32	10.49	19.50	19.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
7 00	6.85	202.68	0.00	671.44	75.75	21.27	0.76	2.25	0.70	10.56	14.44	23.59	14.39	10.47	19.45	19.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Comments PI data loss was on 5/22/19 from 6:53 AM to 7:15 AM, a total of 0.37 hour. VCAPCD Ed Sweede was notified by Robyn Leblanc on 5/22/19 at 8:58 AM.





36M

2019-05-22 15:03

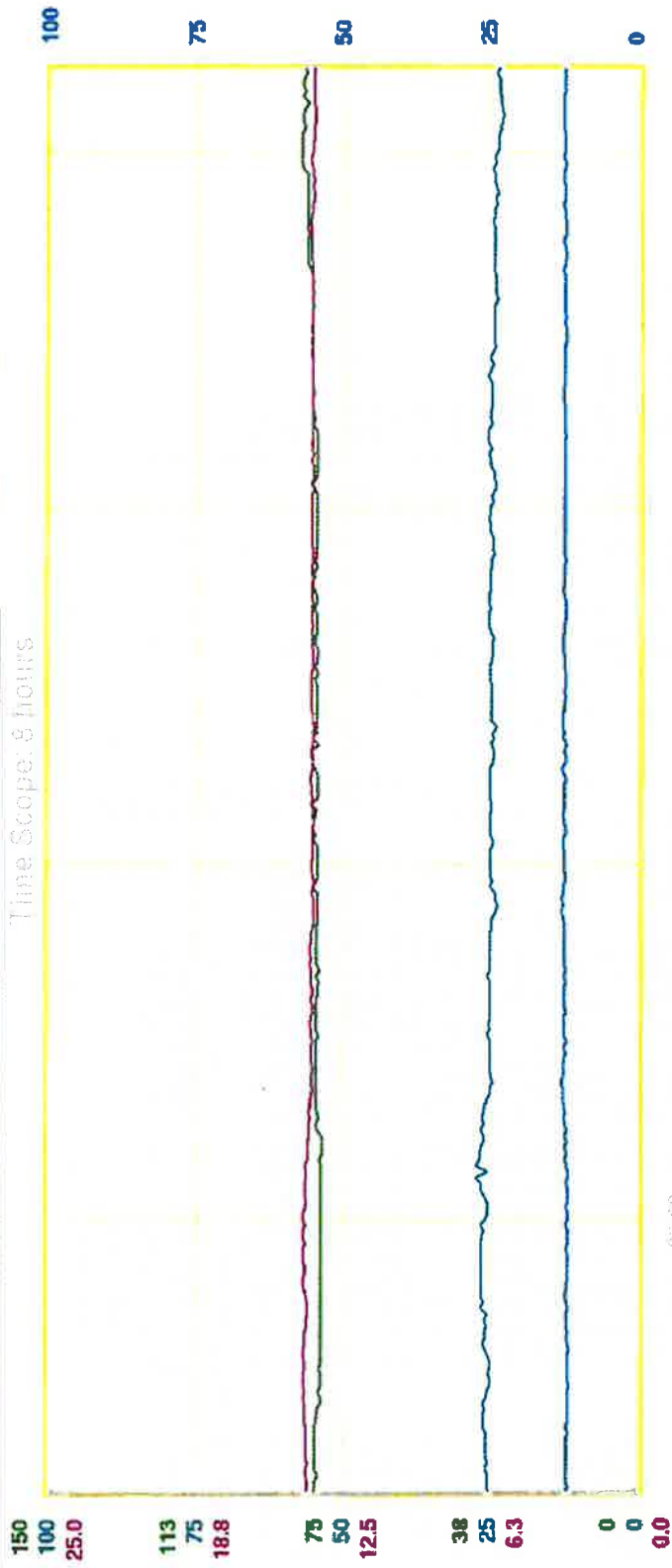
Value 15:00:19

AS117 - Spare

HOIST UP SW

782-2130.ULS

RSMT\_4-20MA ROSEMOUNT CEMS VALUES



05:50 2019-05-22 07:01

ON/Name	Description	Attributes	Treatment	Filter	Time Offset	Form
931AIC1111A.NOX	BAW SCR INLET NOX	MV	Mem	01/28	02.45	93.77 PPM
931AIC1111C.CO	BAW BLR STACK RAW CO	MV	Mem	01/28	25.18	21.99 PPM
931AIC1111B.O2	BAW BLR RAW O2%	MV	Mean	01/28	14.10	14.21 %
931AIC1111D.NOX	BAW BLR STACK NOX	MV	Mean	01/28	11.90	12.03 PPM
931-AIC-1111.INCAL	RSMT CEMS IN CAL	MV	Mem	--	0	0
931-aic-1111.trb	RSMT CEMS TROUBLE	MV	Mem	--	0	0

D1	30 minutes	D2	1 hour	D3	8 hours	D4	1 day	D5	10 days
D6	Positioning...	D7	Trace Control...	D8	Analyze...	D9	Trace Config...	D10	Extended Config...

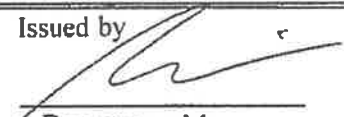
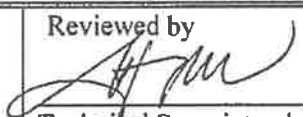
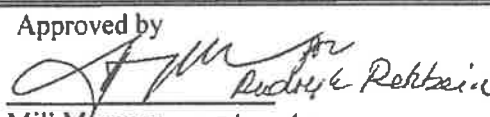


CURRENT		PERMATE H10		STEAM & WATER READINGS		GAS & ELECTRIC READINGS		BOILER TEST RESULTS		
CONCENTRATE H 02	LP	HP	SCG LP	TURBINE	MAXON	DUCT BURNER	MEGAWATTS	DAY SHIFT	NIGHT SHIFT	
863332	212.904	2065	637.440	5455750	2144200	372156	14391	8:36	6:23	
NEW DELVIN TRAILER	% TANK 1	% TANK 2	% FULL	CHILLER HOURS:	PAUSE/SETTER (ON) / OFF	ALARM: NO	YELLOW	GREEN		
4256575	8633860	210787	81	2102	1900	2300	100	300		
AMMONIA DELIVERY	YES	NO	NO	%	1900	2100	1900	300		
	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	
TURBINE	Flay	%	60.12	49.75	51.00	50.14	50.7	50.7	50.0	
	Inlet Temp	'F	463	461	467	468	467	465	463	
	Humidity	%	49.6	40.4	37.4	38.1	38.1	37.4	37.4	37.4
	Vibration (Max)	MILS	0.60	0.50	0.52	0.52	0.52	0.52	0.52	0.52
	Steam Injection	#/SEC	2.26	2.15	2.31	2.31	2.31	2.31	2.31	2.31
	Turbine L.O. Level	%	100	100	100	100	100	100	100	100
	T54	'F	1468	1468	1479	1484	1484	1484	1484	1484
	BATTERIES	12.7.2	V	147.2	147.2	147.2	147.2	147.2	147.2	147.2
	AIR INLET DIFF	FAR	147.4	147.4	147.4	147.4	147.4	147.4	147.4	147.4
	GEN. VIBRATION	PSI	147.4	147.4	147.4	147.4	147.4	147.4	147.4	147.4
GENERATOR	450 Header Temp	'F	310	310	311	311	311	311	311	
	HP Drum Level	IN	0.8	0.1	0.6	0.7	0.7	0.7	0.7	
	LP Drum Level	IN	0.9	0.4	0.9	0.8	0.8	0.8	0.8	
	HP Drum Pressure	PSI	479	479	479	479	479	479	479	
	LP Drum Pressure	PSI	152	152	152	152	152	152	152	
	CO	PPM	20.6	19.8	20.1	19.0	19.0	19.0	19.0	
	NOx	PPM	11.0	10.9	10.4	10.7	10.6	10.6	10.6	
	Hot Well Level	%	146	151	160	160	160	160	160	
	450 Header Temp	'F	404	404	404	404	404	404	404	
	HP Drum Level	IN	0.9	0.9	0.9	0.9	0.9	0.9	0.9	
COGEN BOILER	450 Header Temp	'F	479	479	479	479	479	479	479	
	HP Drum Pressure	PSI	152	152	152	152	152	152	152	
	LP Drum Pressure	PSI	20.5	19.8	20.1	20.6	20.6	20.6	20.6	
	CO	PPM	13.85	13.85	13.85	13.85	13.85	13.85	13.85	
	Hot Well Level	%	135	144	144	144	144	144	144	
	1150 SET POINT	DUCT BURNER	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	
	1150 SET POINT	DUCT BURNER	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	
	1150 SET POINT	DUCT BURNER	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	
	1150 SET POINT	DUCT BURNER	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	
	1150 SET POINT	DUCT BURNER	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	
COMPRESSORS	450 Header Temp	'F	152	152	152	152	152	152	152	
	HP Drum Level	IN	0.9	0.9	0.9	0.9	0.9	0.9	0.9	
	LP Drum Pressure	PSI	222	224	224	224	224	224	224	
	CO	PPM	411	410	410	410	410	410	410	
	NOx	PPM	10.4	10.4	10.4	10.4	10.4	10.4	10.4	
	Hot Well Level	%	135	144	144	144	144	144	144	
	1150 SET POINT	DUCT BURNER	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	
	1150 SET POINT	DUCT BURNER	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	
	1150 SET POINT	DUCT BURNER	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	
	1150 SET POINT	DUCT BURNER	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	1103 B SET POINT	



## New-Indy Oxnard Environmental Incident Report

Shaded section to be completed by the EMR

Name of Incident: PI data loss		Incident Date 5/21/19 & 5/22/19			
Exact Location Incident: Cogen					
Reported By Sandy Robin		Estimated Start and Stop Times of Incident: 5/21/19 8:51 AM – 10:32 AM, 12:26 PM– 1:29 PM 5/22/19 6:53 AM - 7:15 AM		Possible Cause: ESXI Issues	
Incident Type: <input type="checkbox"/> Spill Internal <input type="checkbox"/> Spill External <input checked="" type="checkbox"/> Air Emission <input type="checkbox"/> Other _____		<input type="checkbox"/> Improper Waste Disposal <input type="checkbox"/> Near miss or below spill release guidelines		Released To <input type="checkbox"/> Storm Water System <input type="checkbox"/> Process Sewer <input type="checkbox"/> Ground (External) <input type="checkbox"/> Near Miss <input checked="" type="checkbox"/> Other _____ PI _____	
Detailed Description of Event VMs on each of the ESXI hosts were dropping connections seemingly at random causing loss of data. VMs were able to be brought back online by migrating but wasn't consistent. Troubleshooting we found the 10gbps NIC on each had a bad driver that needed to be updated. We were able to keep the environment running by falling back on the 1gbps NIC which degrades performance but can run that way.					
<i>(if required use additional paper and attach)</i>					
Estimated Amount Released		pH	CONSISTENCY (%)	Estimated Monetary Loss	No. of Emergency Sandbags used
<input type="checkbox"/> _____ Gallons <input type="checkbox"/> _____ Pounds <input type="checkbox"/> Other _____					<input type="checkbox"/> _____ Bags <input type="checkbox"/> N/A
List Any External Emergency Clean Up Personnel Contacted N/A			List Any External Agencies Contacted (Agency, person and time of call.) VCAPCD, Zhen Han, 5/21/19, 11:16 AM Ed Swede, Robyn Lebrilla, 5/22/19 8:58 AM		
List Hueneme Personnel Contacted (Foreman, Mill Manager, etc.) Robyn Lebrilla			Any Acute or Chronic Health Risks (refer to MSDS) N/A		
Describe Any Emergency Response Actions Migrated and rebooted VMs which would bring them back up temporarily. Found issue with the 10gb nic and adjusted to only use 1gb NIC.					
Suggestions to Prevent Reoccurrence				Estimated Completion Date	
1. Upgraded drivers for the 10gb NIC in ESXI				1. 5/23/19	
2.				2.	
3.				3.	
4.				4.	
Root Cause after investigation 10gb NIC driver bad and needed to be upgraded.			Severity Level (level 1 and 2 must be tracked through SHIMS) <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4		
Investigated By: Bryan Vest			Investigated Date: 5/21/19		
<u>Follow Up</u>		<u>By When</u>	<u>Completion Date</u>	<u>By Whom</u>	
Issued by  Department Manager		Reviewed by  Technical Superintendent 5/23/19		Approved by  Mill Manager 5/23/19	

Print Time: 5/23/2019 3:11:47 PM

Note: This document is valid for only ONE week after print time!

# NEW INDY

**CONTAINERBOARD**

June 17, 2019

Ventura County Air Pollution Control District  
669 County Square Drive, Second Floor  
Ventura, CA 93003

Attention: Ed Swede  
Subject: CEMS sample handling failure

Dear Mr. Swede:

New-Indy Oxnard is submitting this follow-up report for the call made to VCAPCD Hotline by Zhen Han on June 13, 2019 at 9:47 AM.

On June 13, 2019 at 8:10 AM, the Continuous Emission Monitoring System (CEMS) stopped reading stack emissions. During troubleshooting, it was determined that the stack gas flow was restricted. After cycling the calibration and stack gas control valves, stack gas started flowing to the analyzer. The 10:00 AM auto calibration occurred shortly after establishing the gas flow, but it did not pass. Further troubleshooting of controls and sample line were done and unit had a passing calibration at 2:42 PM. The CEMS sample handling system failure resulted to data loss from 8:10 AM – 9:57 AM, a total of 1.78 hrs.

Per Universal Sample Handling recommendations, the stack and calibration gas control valves in sample handler were replaced. Universal also recommended removal of the redundant control valve in the stack, which is planned to be completed on June 18.

The Daily Emission Sheets, PI trends, ABB trends, Cogen Daily Log, and Environmental Incident Report have been provided for your review. If you have any questions or require any additional information, please call me at (805) 271-7284.

Sincerely,



Robyn Lebrilla  
Environmental Engineer

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**NEW INDY OXNARD, LLC**

5936 PERKINS ROAD • OXNARD, CALIFORNIA 93033 • WWW.NEWINDYCONTAINERBOARD.COM  
PHONE (805) 986-3881 • FAX (805) 488-5186



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:

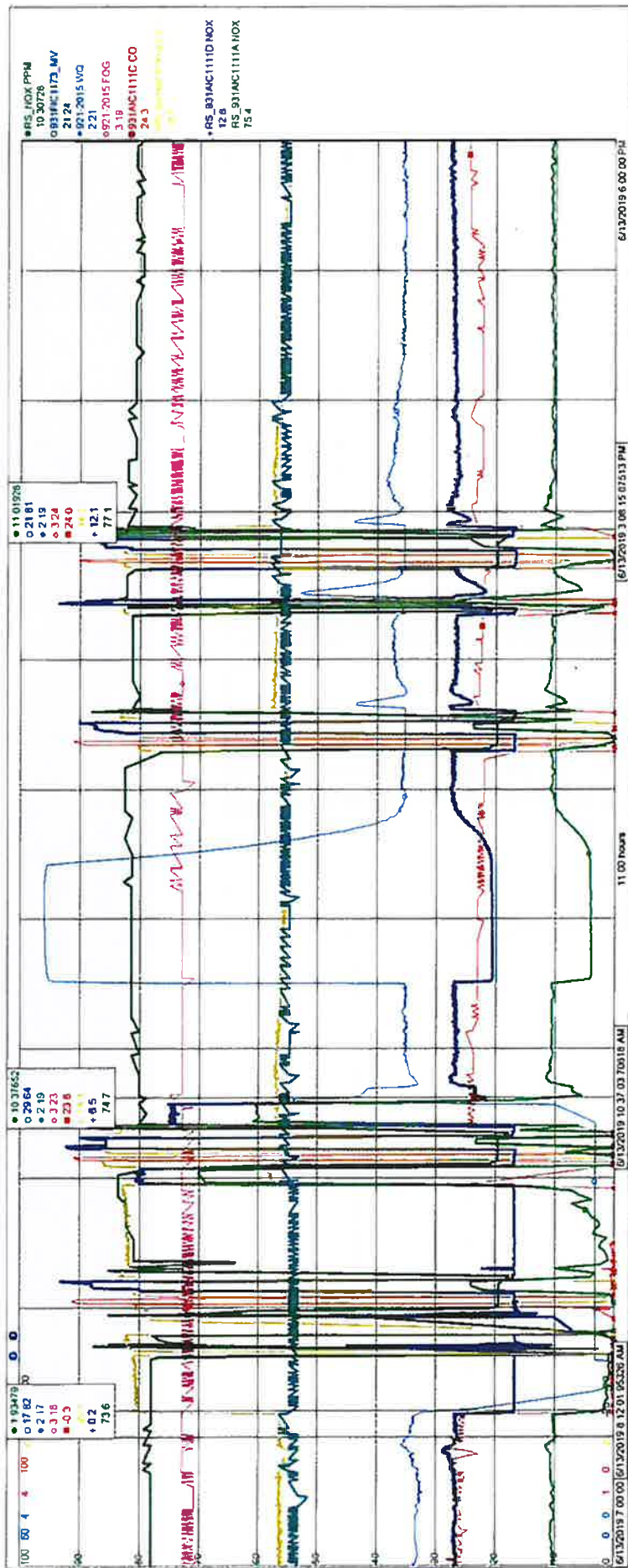
Air Quality Engineer  
Ventura County Air Pollution Control District  
669 County Square Drive  
Ventura, CA 93003

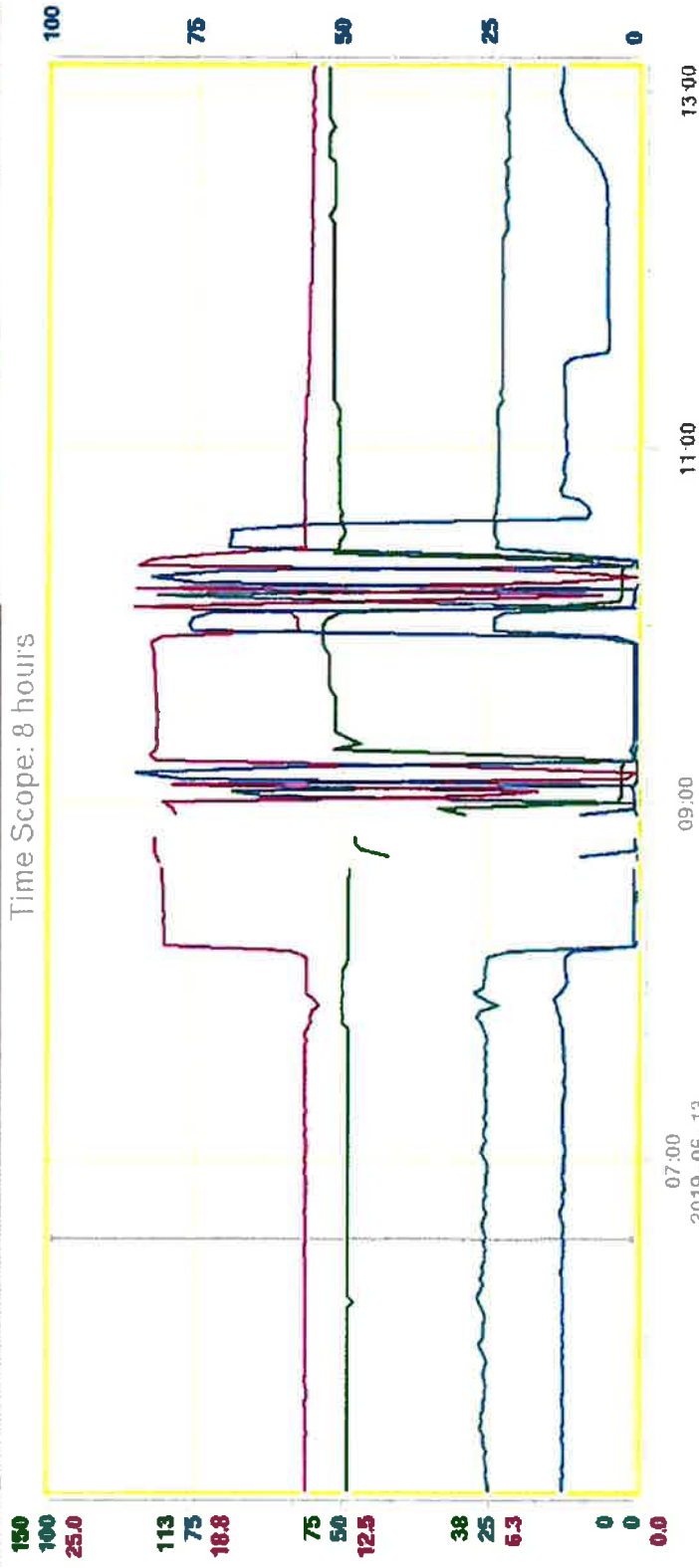
### Certification by Responsible Official

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>Technical Manager</u></p>	<p>Date: <u>6/17/2019</u></p>
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------







Ch#Name	Description	Attribute	Treatment	Ruler Time	Ruler Value	Current Value	Unit	Filter	Time Offset	Form
931AIG1111A.NOX	B&W SCR INLET NOX	MV	Mean	08:52 2018-06-13	73.73	75.52	PPM			
931ANG1111C.CO	B&W BLR STACK RAW CO	MV	Mean	08:52 2018-06-13	28.10	18.22	PPM			
931AIG1111B.O2	B&W BLR RAW O2%	MV	Mean	08:52 2018-06-13	14.06	14.38	%			
931AIG1111D.NOX	B&W BLR STACK NOX	MV	Mean	08:52 2018-06-13	12.11	11.44	PPM			
931-AIG-1111.INCAL	RSMT GEMS IN CAL	MV	Mean			0				
931-alc-1111.lrb	RSMT GEMS TROUBLE	MV	Mean			0				

ABB

30 minutes 1 hour 1 day 10 days

Positioning... Trace Control... Analyze... Trace Config... Extended Config...

NEW DEMOH TRAILER		AMMONIA DELIVERY		STEAM & WATER READINGS				GAS & ELECTRIC READINGS				BOILER TEST RESULTS		
PERMEATE H <sub>2</sub> O	CONCENTRATE H <sub>2</sub> O	LP	HP	FACESETTER	CHILLER HOURS:	SCG LP	TURBINE	MAXON	DUCT BURNER	MEGAWATT	DAY SHIFT	NIGHT SHIFT		
YES	NO	TANK 1	TANK 2	%	%	ALARM: RED	ALLOW	3.00	5.00	2.24	8.1	8.30		
94916600	87385453	3.16	2.2	18.00	21.00	6.55	3.03	2.24	2.03	2.60				
4805552	87336495	12.40	3.9	49.25	46.74	6.54	2.67	4.50	2.67	3.50				
<p>GEN. 1110 AMPS GENVARS 2.80 MEGA VARS GEN. 1100 AMPS GENVARS 2.5 MEGA VARS</p> <p>FIELD 187 AMPS FIELD VOLTS 168 FIELD 185 AMPS FIELD VOLTS 168</p> <p>COOLING TWR INLET 89 F COOLING TWR INLET 84 F COOLING TWR OUTLET 86 F</p>														
<p>450 Header Temp F 7.00 9.00 11.00 13.00 15.00 17.00 19.00 21.00 23.00 25.00</p> <p>HP Drum Level IN 0.9 4.1 7.0 7.0 7.0 7.0 7.0 7.0 7.0 7.0</p> <p>LP Drum Pressure PSI 4.74 4.74 4.74 4.74 4.74 4.74 4.74 4.74 4.74 4.74</p>														
<p>COGEN BOILER</p> <p>450 Header Temp F 7.00 9.00 11.00 13.00 15.00 17.00 19.00 21.00 23.00 25.00</p> <p>HP Drum Level IN 0.9 4.1 7.0 7.0 7.0 7.0 7.0 7.0 7.0 7.0</p> <p>LP Drum Pressure PSI 4.74 4.74 4.74 4.74 4.74 4.74 4.74 4.74 4.74 4.74</p>														
<p>COMPRESSORS</p> <p>Filter Separator PSI 2.31 2.31 2.31 2.31 2.31 2.31 2.31 2.31 2.31 2.31</p> <p>Gas Receiver PSI 4.0 4.0 4.0 4.0 4.0 4.0 4.0 4.0 4.0 4.0</p>														

NIGHT SHIFT OPERATOR: NAME: WILKINS / BRADSMITH

DAY SHIFT OPERATOR: NAME: MTT

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NOTES: Reported emission issues to Jay on 6/13/19

23:09 MCC B High Temp Alarm

Supermax Furnace

Turbine N<sub>2</sub> Inlet not sufficient off water

TANK BULK ON IT STARTED CONDENSE BULK

Daniel

BOILER FEEDWATER

pH 8.75-9.5

Conductivity <5mmhos

Silica <20 ppb

R.O.

Feed 105<1000 ppm

Permeate 105<10 ppm

pH (Feed 7.5)

CONDENSATE

HP-pH 8.5-9.5

Conductivity <2mmhos

LP-pH 8.5-9.5

Conductivity <2mmhos

HP 9.5 - 10.5

Conductivity 75-150

Phosphate 5-15 ppm

Silica <5 ppm

Iron ppm

MIXED BED

pH 6.0 - 7.5

Conductivity <1mmhos

Silica <10 ppb

HP Steam Test

Silica <20 ppb

SOFTENER

Hardness <1.0 ppm

Running (1 or 2)

STEAM TEST

Silica <20 ppb

PV NO.2

HP BLOW DOWN

DAY SHIFT: 10:08

NORTH TANK

SOUTH TANK

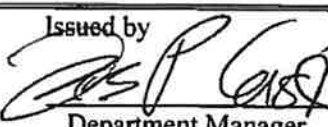
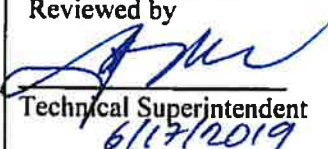
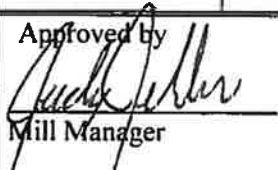
SALT

FEET

1111

## New-Indy Oxnard Environmental Incident Report

Shaded section to be completed by the EMR

Name of Incident: CEMS sample handling system failure		Incident Date: 06/13/2019	
Exact Location Incident: CEMS Analyzer			
Reported By: Jay Maharaj		Estimated Start and Stop Times of Incident: 06/13/2019 8:10 AM – 2:42 PM	Possible Cause: Sample contamination
Incident Type: <input type="checkbox"/> Spill Internal <input type="checkbox"/> Improper Waste Disposal <input type="checkbox"/> Spill External <input type="checkbox"/> Near miss or below spill release guidelines <input checked="" type="checkbox"/> Air Emission <input type="checkbox"/> Other _____		Released To <input type="checkbox"/> Storm Water System <input type="checkbox"/> Secondary Containment <input type="checkbox"/> Process Sewer <input checked="" type="checkbox"/> Air <input type="checkbox"/> Ground (External) <input type="checkbox"/> Ground (Inside Mill Property) <input type="checkbox"/> Near Miss <input type="checkbox"/> Other _____	
Detailed Description of Event: On 6/12 during mill wide maintenance shutdown, E&I performed maintenance on CEMS. The control valve at stack sample probe was moved closer to heated probe to reduce unheated sample line exposure to cool air and prevent moisture accumulation. On 6/13 8:10 am CEMS stopped reading B&W gas values. E&I was notified, during troubleshooting it was determined calibration gases would flow to analyzer, but stack gases would not. After cycling valves for calibration and stack gases, stack gases started flowing to analyzer. Auto calibration occurred 8 minutes after establishing gas flow, but it did not pass. Further troubleshooting of controls and sample line were done and unit had a passing calibration at 2:42 PM. On 6/14 Contacted Universal Sample Handling, the manufacturer of our sample handling system. Prevention action items 1, & 2 are recommendations from Universal. (if required use additional paper and attach)			
Estimated Amount Released		pH	CONSISTENCY (%)
<input type="checkbox"/> _____ Gallons <input type="checkbox"/> _____ Pounds <input type="checkbox"/> Other _____			
Estimated Monetary Loss		No. of Emergency Sandbags used	After event, Sandbags Removed/Disposed
		<input type="checkbox"/> _____ Bags <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No
List Any External Emergency Clean Up Personnel Contacted: None		List Any External Agencies Contacted (Agency, person and time of call.) APCD at 9:47 A.M.	
List Hueneme Personnel Contacted (Foreman, Mill Manager, etc.) Robyn Lebrilla		Any Acute or Chronic Health Risks (refer to MSDS): N/A	
Describe Any Emergency Response Actions:			
Suggestions to Prevent Reoccurrence			Estimated Completion Date
1. Replace Stack/Cal Gas control valves in sample handler.			1. 6/17/19
2. Remove redundant Stack/Cal Gas control valve on stack.			2. 6/18/19
3.			3.
Root Cause after investigation: Sample handling control valve issue resulting to lost flow from stack.		Severity Level (level 1 and 2 must be tracked through SHIMS) <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4	
Investigated By: Jay Maharaj		Investigated Date: 6/13/19	
Follow Up		By When	Completion Date
Issued by  Department Manager	Reviewed by  Technical Superintendent 6/17/2019	Approved by  Mill Manager	

Print Time: 6/17/2019 10:15:58 AM

Note: This document is valid for only ONE week after print time!



# NEW INDY

**CONTAINERBOARD**

July 19, 2019

Ventura County Air Pollution Control District  
669 County Square Drive, Second Floor  
Ventura, CA 93003

Attention: Ed Swede  
Subject: CEMS calibration failure

Dear Mr. Swede:

New-Indy Oxnard is submitting this follow-up report for the call made to VCAPCD Hotline by Rudy Rehbein on July 15, 2019 at 11:35 PM.

On July 12, 2019 at 6:24 AM, the mill had power disruption which shut down the operations including Cogen. On July 15, 2019 at 9:04 PM, Cogen was back online but the CEMS was not calibrating properly. Investigation followed and Rosemount service technician arrived on July 16. After troubleshooting, the technician found that the PLC microprocessor has been affected by the power disruption and the calibration parameters were lost. He resolved the issue by separating the gas units from the processor, calibrating each channel separately and then inputting the calibration results into the processor. CEMS successful calibrations were completed at 3:24 PM. There was no valid emission data from July 15, 9:04 PM to July 16, 3:24 PM, a total of 18.33 hours.

The Daily Emission Sheets, PI trends, ABB trends, Cogen Daily Log and Environmental Incident Report have been provided for your review. If you have any questions or require any additional information, please call me at (805) 271-7284.

Sincerely,



Robyn Lebrilla  
Environmental Engineer

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**NEW INDY OXNARD, LLC**

5936 PERKINS ROAD • OXNARD, CALIFORNIA 93033 • WWW.NEWINDYCONTAINERBOARD.COM  
PHONE (805) 986-3881 • FAX (805) 488-5186



Ventura County  
Air Pollution  
Control District

## RESPONSIBLE OFFICIAL'S CERTIFICATION FORM

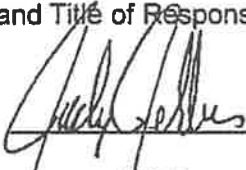
Ventura County APCD Rule 33.9 requires that "any document, including reports, schedule of compliance progress reports and compliance certifications, required by a Part 70 permit shall be certified by a responsible official." Therefore, this form shall be signed by the company's Responsible Official and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

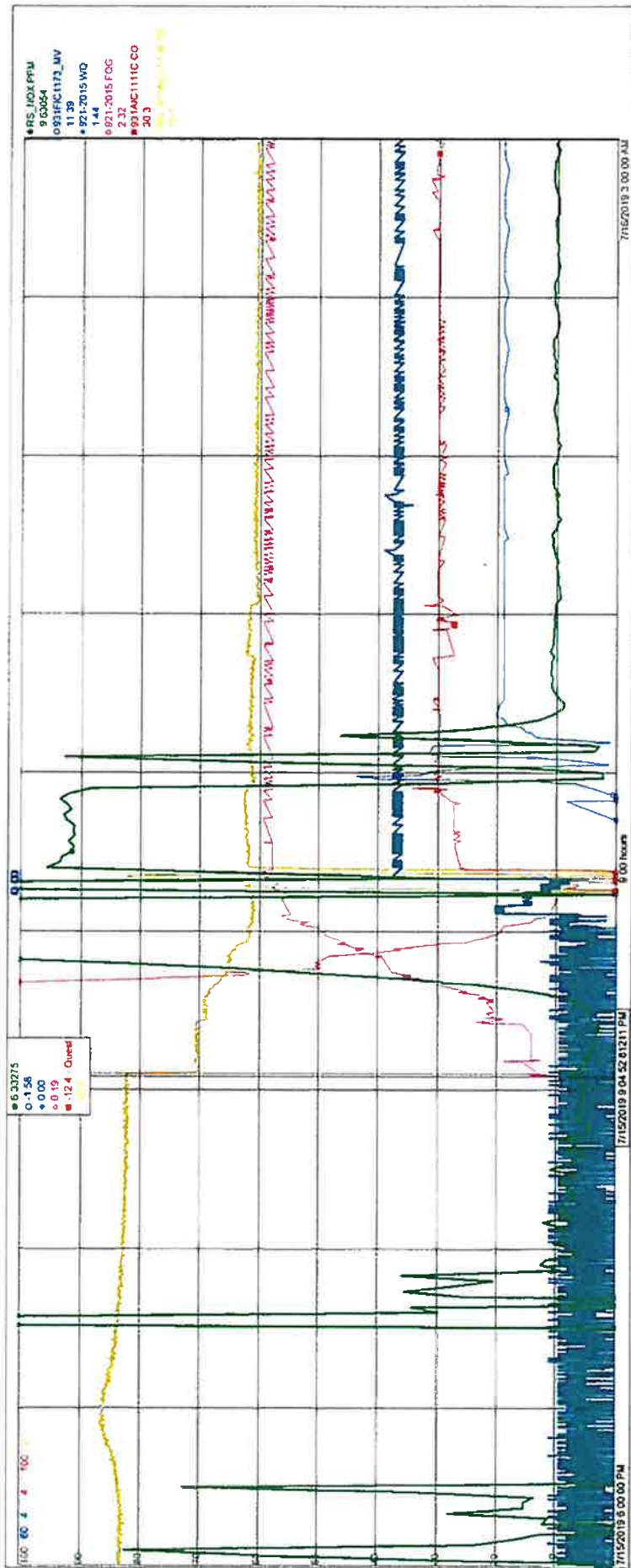
Air Quality Engineer  
Ventura County Air Pollution Control District  
669 County Square Drive  
Ventura, CA 93003

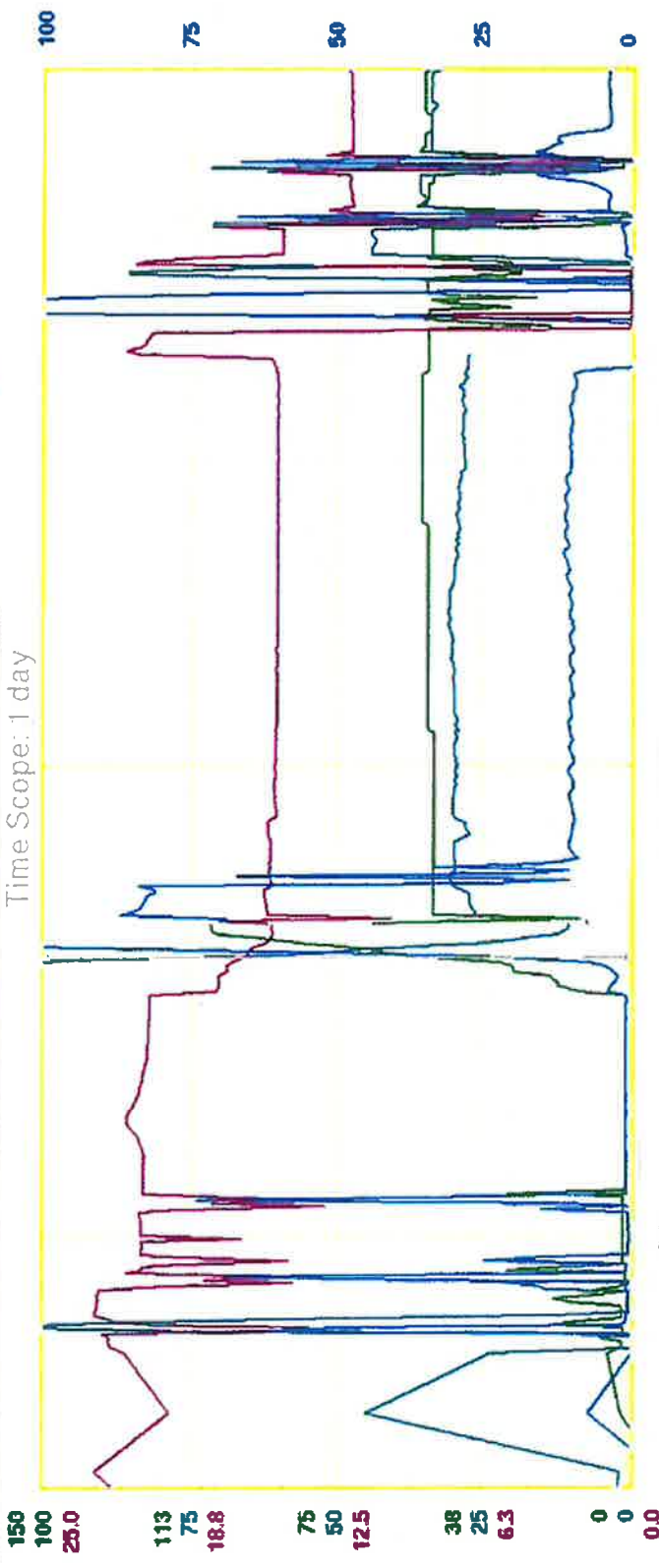
### Certification by Responsible Official

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

<p>Signature and Title of Responsible Official:</p> <p>Signature: <u></u></p> <p>Title: <u>Mill Manager</u></p>	<p>Date:</p> <p><u>7/19/2019</u></p>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------







17.00 61.98  
 0 9-07-15 2019 07-16

ON Name	Description	Attribute	Treatment	Ruler:Time	Ruler:Value	Current:Value	Unit	Filter	Time Offset	Form
931AIC111A:NOX	B&W SCR INLET:NOX	MV	Mem	21-44 2019-07-15	54.06	82.73	PPM			
931AIC111C:CO	B&W BLR STACK RAW CO	MV	Mem	21-44 2019-07-15	67.94	20.47	PPM			
931AIC111B:O2	B&W BLR RAW O2%	MV	Mean	21-44 2019-07-15	18.45	14.58	%			
931AIC111D:NOX	B&W BLR STACK NOX	MV	Mean	21-44 2019-07-15	25.32	11.20	PPM			
931-AIC-111I:NCAL	RSMT CEMS IN CAL	MV	Mem	---		0				
931-alc-111I:rb	RSMT CEMS TROUBLE	MV	Mem	---		1				

D1	30 minutes	D2	1 hour	D3	8 hours	D5	10 days
D4	PostHolding...	D6	Trace Control...	D8	Analyza...	D9	Trace Config...
							Extended Config...



CURRENT		PERMATE H <sub>2</sub> O		CONCENTRATE H <sub>2</sub> O		LP		HP		SCG LP		TURBINE		MAXON		DUCT BURNER		MECAWATS	
479	39	58	888	2289	2758	24	24	24	24	7203	260	264	2100	233	2574	2678	47937		
PREVIOUS	47	36	999	8445	0	11	11	11	11	715	8150	257	1090	232	2857	0	47881		
NEW DEMIN TRAILER		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		TANK 1		TANK 2		CHILLER HOURS											
AMMONIA DELIVERY		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		% FULL: 80															
TURBINE																			
FMV		%		7:00		9:00		11:00		13:00		15:00		17:00		19:00		21:00	
Inlet Temp		°F		36.0		36.0		36.0		36.0		36.0		36.0		36.0		36.0	
Humidity		%		62		62		62		62		62		62		62		62	
Vibration (Max)		MILS		72.4		72.4		72.4		72.4		72.4		72.4		72.4		72.4	
Stream Injection		1/SEC		.64		.64		.64		.64		.64		.64		.64		.64	
Turbine L.O. Level		%		1.44		1.44		1.44		1.44		1.44		1.44		1.44		1.44	
T54		°F		100		100		100		100		100		100		100		100	
GENERATOR																			
Gen. Bearing Drain		°F		7:00		9:00		11:00		13:00		15:00		17:00		19:00		21:00	
L.O. Supply		°F		150		150		150		150		150		150		150		150	
Gen. Vibration (Max)		IPS		.20		.20		.20		.20		.20		.20		.20		.20	
Tie Line		MW		0		0		0		0		0		0		0		0	
Generator Voltage		KV		15.2		15.2		15.2		15.2		15.2		15.2		15.2		15.2	
COGEN BOILER																			
450 Header Temp		°F		7:00		9:00		11:00		13:00		15:00		17:00		19:00		21:00	
HP Drum Level		IN		707		707		707		707		707		707		707		707	
LP Drum Level		IN		1.2		1.2		1.2		1.2		1.2		1.2		1.2		1.2	
HP Drum Pressure		PSI		0.2		0.2		0.2		0.2		0.2		0.2		0.2		0.2	
LP Drum Pressure		PSI		461		461		461		461		461		461		461		461	
CO		PPM		146		146		146		146		146		146		146		146	
NOx		PPM		30.0		30.0		30.0		30.0		30.0		30.0		30.0		30.0	
Hot Well Level		%		15.22		15.22		15.22		15.22		15.22		15.22		15.22		15.22	
450 Header Temp		°F		2000		2000		2000		2000		2000		2000		2000		2000	
HP Drum Level		IN		708		708		708		708		708		708		708		708	
LP Drum Level		IN		0.0		0.0		0.0		0.0		0.0		0.0		0.0		0.0	
HP Drum Pressure		PSI		461		461		461		461		461		461		461		461	
LP Drum Pressure		PSI		146		146		146		146		146		146		146		146	
CO		PPM		27.0		27.0		27.0		27.0		27.0		27.0		27.0		27.0	
NOx		PPM		9.3		9.3		9.3		9.3		9.3		9.3		9.3		9.3	
Hot Well Level		%		15.2		15.2		15.2		15.2		15.2		15.2		15.2		15.2	
COMPRESSORS																			
AUTO / ON / OFF				11:00 SET POINT		11:03 B SET POINT		11:50 SET POINT		11:50 SET POINT		11:50 SET POINT		11:50 SET POINT		11:50 SET POINT		11:50 SET POINT	
Filter Separator		PSI		23.00		23.00		23.00		23.00		23.00		23.00		23.00		23.00	
Gas Receiver		PSI		24.0		24.0		24.0		24.0		24.0		24.0		24.0		24.0	
Crankcase Oil Level		%		40		40		40		40		40		40		40		40	
Frame Oil Pressure (25-50)		PSI		72		72		72		72		72		72		72		72	
Temp. cooling		°F		T1		T1		T1		T1		T1		T1		T1		T1	
Temp. cooling		°F		T2		T2		T2		T2		T2		T2		T2		T2	

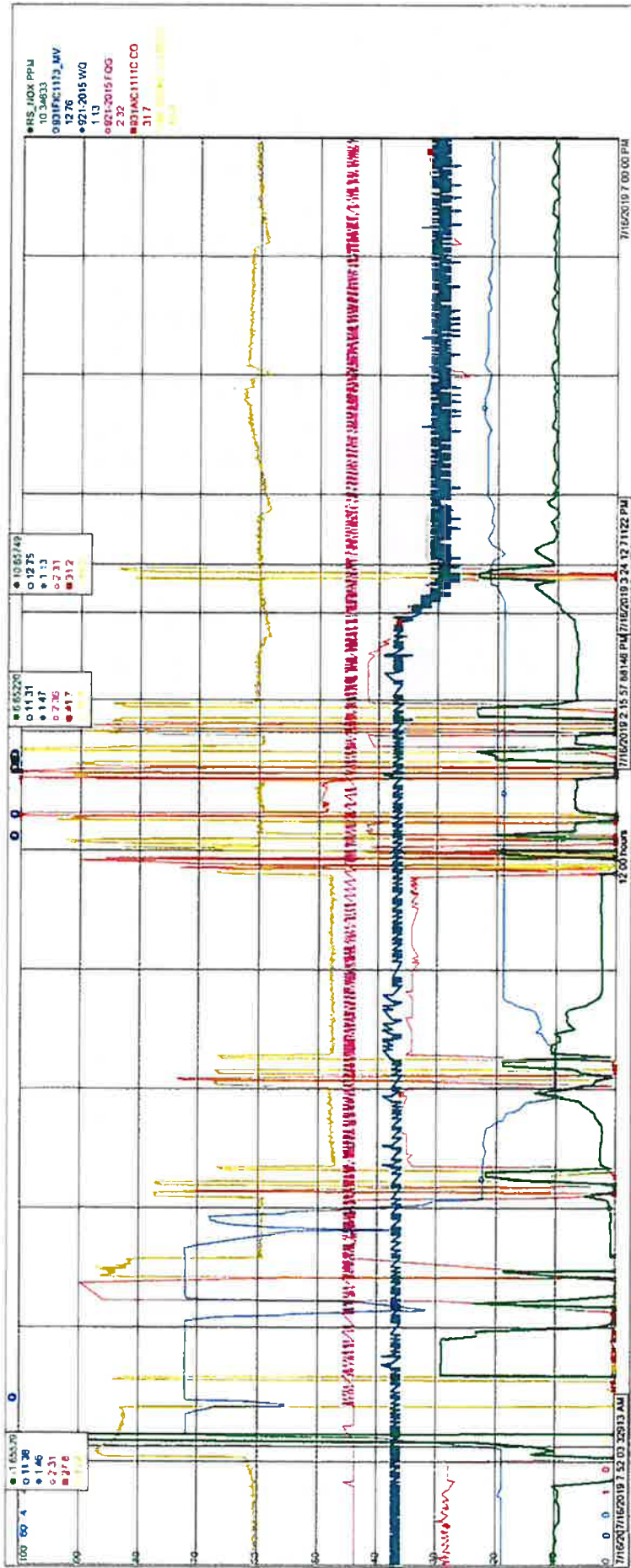
NAME: M DAVIS

NAME: M DAVIS

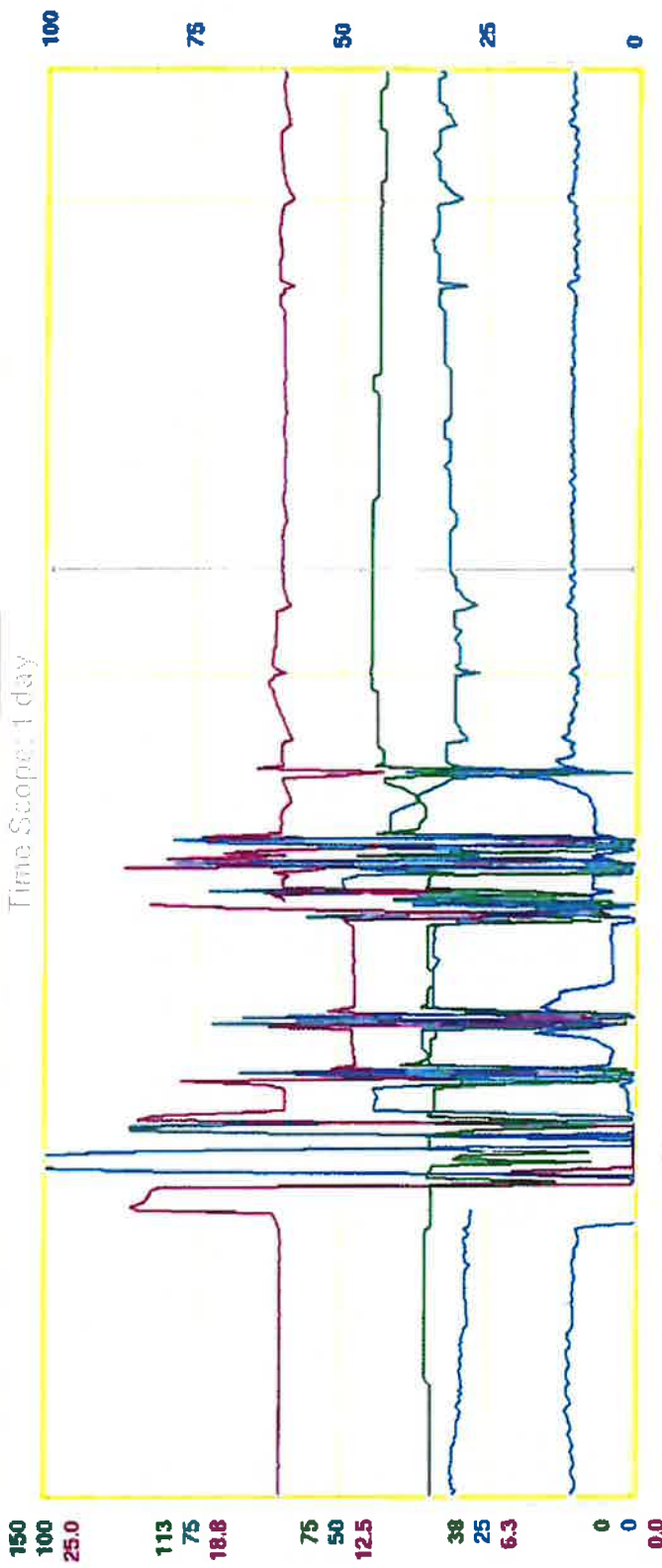
DATE: 07-15-19

FORM 000-2011 - REV.1









ION Name	Description	Attribute	Treatment	Ruler: Time	Ruler: Value	Current Value	Unit	Filter	Time Offset	Form
931AIC1111A:NOX	B&W SCR INLET:NOX	MV	Mem	18:48 2019-07-16	87.36	81.80	PPM			
931AIC1111C:CO	B&W BLR STACK RAW CO	MV	Mem	18:48 2019-07-16	31.89	20.47	PPM			
931AIC1111B:O2	B&W BLR RAW O2%	MV	Mean	18:48 2019-07-16	15.10	14.54	%			
931AIC1111D:NOX	B&W BLR STACK NOX	MV	Mean	18:48 2019-07-16	9.98	11.32	PPM			
931-AIC-1111:INCAL	RSMT CEMS IN CAL	MV	Mem			0				
931-aic-1111:trb	RSMT CEMS TROUBLE	MV	Mem			1				

D1	30 minutes	D2	1 hour	D3	8 hours	D5	10 days	
D6	Positioning...	D7	Trace Control...	D8	Analyze...	D9	Trace Config...	
							D10	Extended Config...

< > << >> <<< >>> Current Time Save Trend Hide Table



CURRENT		PREVIOUS		NEW DEMIN TRAILER		AMMONIA DELIVERY		PERMEATE H <sub>2</sub> O		CONCENTRATE H <sub>2</sub> O		LP		HP		SCG LP		TURBINE		MASON		DUCT BURNER		MEGAWATS											
980	7015	888	6152	888	2284	85	85	1651	98	2458	72	2468	2	205920	3549	38	2648	2340	7789	2332	571	3549	38	47318											
974	3458	888	2284	85	85	1651	98	2458	72	2468	2	205920	3549	38	2648	2340	7789	2332	571	3549	38	47318	47318												
CHILLER HOURS: 102,759		: 21:46		PACEMAKER ON / OFF		ALARM: RED / YELLOW / GREEN		BOILER FEEDWATER		PH 8.75 - 9.5		Conductivity <20mmhos		Silica <20ppb		R.O.		Feed 10S<1000 ppm		Permeate 10S<10 ppm		PH (feed 7.5)		CONDENSATE											
7.54		8.4		3.48		134.9		7.54		8.4		3.48		134.9		7.54		8.4		3.48		134.9		7.54											
TURBINE		GENERATOR		COGEN BOILER		COMPRESSORS		450 Header Temp		HP Drum Level		LP Drum Level		HP Drum Pressure		LP Drum Pressure		CO		On		Hot Well Level		450 Header Temp		HP Drum Level		LP Drum Pressure		CO		On		Hot Well Level	
7.00		9.00		11.00		13.00		15.00		17.00		19.00		21.00		23.00		25.00		27.00		29.00		31.00		33.00		35.00		37.00		39.00			
151		152		153		154		155		156		157		158		159		160		161		162		163		164		165		166		167			
121		121		123		123		123		123		123		123		123		123		123		123		123		123		123		123		123			
24		24		23		24		24		25		25		25		25		25		25		25		25		25		25		25		25			
12.34		12.34		12.34		12.34		12.34		12.34		12.34		12.34		12.34		12.34		12.34		12.34		12.34		12.34		12.34		12.34		12.34			
7.00		9.00		11.00		13.00		15.00		17.00		19.00		21.00		23.00		25.00		27.00		29.00		31.00		33.00		35.00		37.00		39.00			
151		152		153		154		155		156		157		158		159		160		161		162		163		164		165		166		167			
121		121		123		123		123		123		123		123		123		123		123		123		123		123		123		123		123			
24		24		23		24		24		25		25		25		25		25		25		25		25		25		25		25		25			
12.34		12.34		12.34		12.34		12.34		12.34		12.34		12.34		12.34		12.34		12.34		12.34		12.34		12.34		12.34		12.34		12.34			
7.00		9.00		11.00		13.00		15.00		17.00		19.00		21.00		23.00		25.00		27.00		29.00		31.00		33.00		35.00		37.00		39.00			
151		152		153		154		155		156		157		158		159		160		161		162		163		164		165		166		167			
121		121		123		123		123		123		123		123		123		123		123		123		123		123		123		123		123			
24		24		23		24		24		25		25		25		25		25		25		25		25		25		25		25		25			
12.34		12.34		12.34		12.34		12.34		12.34		12.34		12.34		12.34		12.34		12.34		12.34		12.34		12.34		12.34		12.34		12.34			

NIGHT SHIFT OPERATOR

DAY SHIFT OPERATOR

NAME:


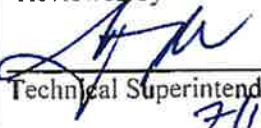

NAME:

W. DAVIS

W. DAVIS

# New-Indy Oxnard Environmental Incident Report

Shaded section to be completed by the EMR

Name of Incident: Turbine CEMS not calibrating		Incident Date: 07/15/2019	
Exact Location Incident Cogen area			
Reported By James West		Estimated Start and Stop Times of Incident: 7/15 9:04 PM – 7/16 3:24 PM	Possible Cause: Power disruption
Incident Type: <input type="checkbox"/> Spill Internal <input type="checkbox"/> Improper Waste Disposal <input type="checkbox"/> Spill External <input type="checkbox"/> Near miss or below spill release guidelines <input checked="" type="checkbox"/> Air Emission <input type="checkbox"/> Other _____		Released To <input type="checkbox"/> Storm Water System <input type="checkbox"/> Secondary Containment <input type="checkbox"/> Process Sewer <input checked="" type="checkbox"/> Air <input type="checkbox"/> Ground (External) <input type="checkbox"/> Ground (Inside Mill Property) <input type="checkbox"/> Near Miss <input type="checkbox"/> Other _____	
Detailed Description of Event The CEMS unit for stack NOx and CO will not accurately calibrate on the span. Both NOx and CO are 19% below the actual span value. Calibrated several times manually and automatically. Changed out the sample pump and problem continued. Contacted the OEM and received a response the next day, July 16. Worked with OEM over the phone for 4 hours until a local Rosemount representative arrived at the mill. After troubleshooting, the technician found that the PLC parameters/constants were lost. The technician ran a calibration process by separating the CO and NOx units from the processor and running a calibration then inputting the results into the processor. Ran a second calibration with the processor and the system came back to normal. The successful calibration was completed by 3:24 PM.			
<i>(if required use additional paper and attach)</i>			
Estimated Amount Released		pH	CONSISTENCY (%)
<input type="checkbox"/> _____ Gallons <input type="checkbox"/> _____ Pounds <input checked="" type="checkbox"/> Other: Zero _____			
List Any External Emergency Clean Up Personnel Contacted		List Any External Agencies Contacted (Agency, person and time of call.) VCAPCD	
List Huenele Personnel Contacted (Foreman, Mill Manager, etc.) Shift supervisor, Mill Manager, E&I Supervisor		Any Acute or Chronic Health Risks (refer to MSDS) No	
Describe Any Emergency Response Actions New-Indy E&I technician on site worked on the calibration failure the evening of 7/15.			
Suggestions to Prevent Reoccurrence		Estimated Completion Date	
1. Develop a procedure to repair a loss of PLC memory parameters.		1. 8/6/2019	
2.		2.	
3.		3.	
4.		4.	
Root Cause after investigation PLC Microprocessor was affected by power disruption.		Severity Level (level 1 and 2 must be tracked through SHIMS) <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4	
Investigated By Rudy Rehbein		Investigated Date 7/16/19	
<u>Follow Up</u>		<u>By When</u>	<u>Completion Date</u>
Issued By  Department Manager	Reviewed by  Technical Superintendent 7/19/2019	Approved by  Mill Manager 7/19/2019	

Print Time: 7/19/2019 11:17:46 AM

Note: This document is valid for only ONE week after print time!

# NEW INDY

**CONTAINERBOARD**

August 13, 2019

Ed Swede  
Ventura County Air Pollution Control District  
669 County Square Drive, Second Floor  
Ventura, CA 93003

Subject: Cogen Excess NOx Emission

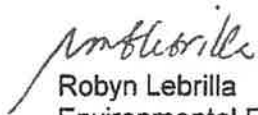
Dear Mr. Swede:

New-Indy Oxnard is submitting this follow-up report for a call made to VCAPCD Breakdown Center Hotline by Howard Gastelum on August 12, 2019 at 2:50 AM.

On August 12, 2019, at 1:55 AM, the mill experienced electrical control fluctuations causing equipment to shut down. One of the affected units was the ammonia dilution fan for Cogen SCR (Selective Catalytic Reduction). Since the ammonia dilution fan stopped working, the ammonia control valve shut off automatically resulting to high NOx emissions. Addition of ammonia was re-established at about 2:30 AM and the system was under control at about 2:45 AM. The NOx emission was high from 1:55 AM to 2:45 AM, which resulted to a total of 17.17 lbs excess NOx emissions (see attached calculations). Investigation is in progress to determine the cause of electrical control fluctuations in the mill.

The Daily Emission Sheet, PI trend, ABB trend, Daily Logs and Environmental Incident Report have been provided for your review. If you have any questions or require any additional information, please call me at (805) 271-7284.

Sincerely,



Robyn Lebrilla  
Environmental Engineer

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**NEW INDY OXNARD, LLC**

5936 PERKINS ROAD • OXNARD, CALIFORNIA 93033 • WWW.NEWINDYCONTAINERBOARD.COM  
PHONE (805) 986-3881 • FAX (805) 488-5186



Ventura County  
Air Pollution  
Control District

## RESPONSIBLE OFFICIAL'S CERTIFICATION FORM

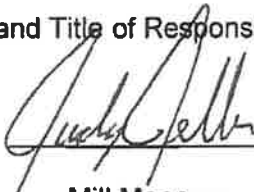
Ventura County APCD Rule 33.9 requires that "any document, including reports, schedule of compliance progress reports and compliance certifications, required by a Part 70 permit shall be certified by a responsible official." Therefore, this form shall be signed by the company's Responsible Official and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

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

### Certification by Responsible Official

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

<p>Signature and Title of Responsible Official:</p> <p>Signature: <u></u></p> <p>Title: <u>Mill Manager</u></p>	<p>Date:</p> <p><u>8/13/2019</u></p>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------

ExcessEmissionCalc

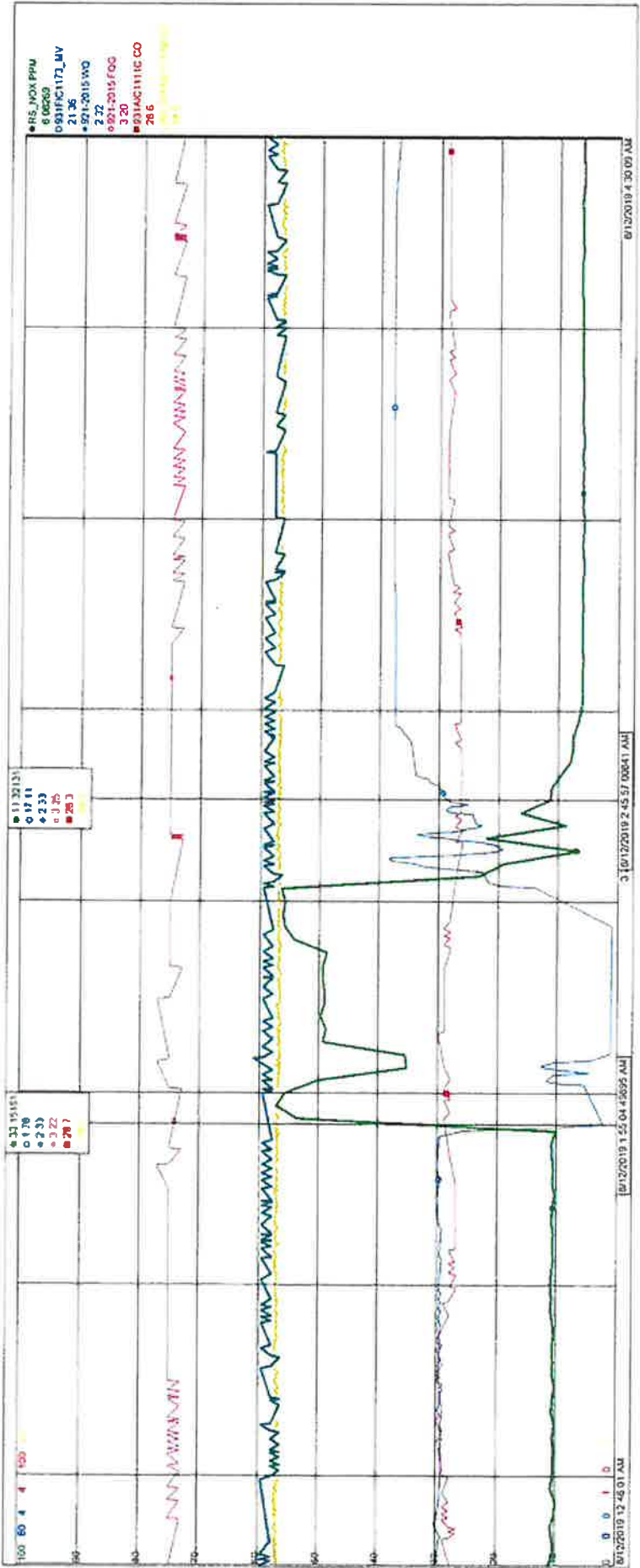
New-Indy Oxnard, LLC Excess Emission Calculations												
Date	Time	NOX Emissions (PPM)	Average 3-Hour NOx (PPM)	NOx Permit limit (PPM)	Excess NOx (PPM)	X (see Notes)	Average Hourly Fuel Throughput Duct Burner (MSCFH)	Average Hourly Fuel Throughput Turbine (MSCFH)	Total Hourly Fuel Throughput (MMSCFH)	Average Excess NOx Emission (lbs/hr)	Number of Hrs	Total Excess NOx Emissions (lbs)
8/12/2019	1:00 AM - 2:00 AM	14.18					8.36	266.35				
	2:00 AM - 3:00 AM	32.70					9.55	266.01				
	3:00 AM - 4:00 AM	6.04					10.15	265.15				
			17.64	12.00	5.64	3.69	9.35	265.84	0.28	5.72	3	17.17
Notes: $X = F \cdot MW^{(20.9/20.9-15)} / (1/387)^{(1/1000000)} \cdot (HHV)$ F-factor: 8642 HHV: 1013.4 NO2: 46 $X = 3.69$												

**DAILY ENVIRONMENTAL REPORT**

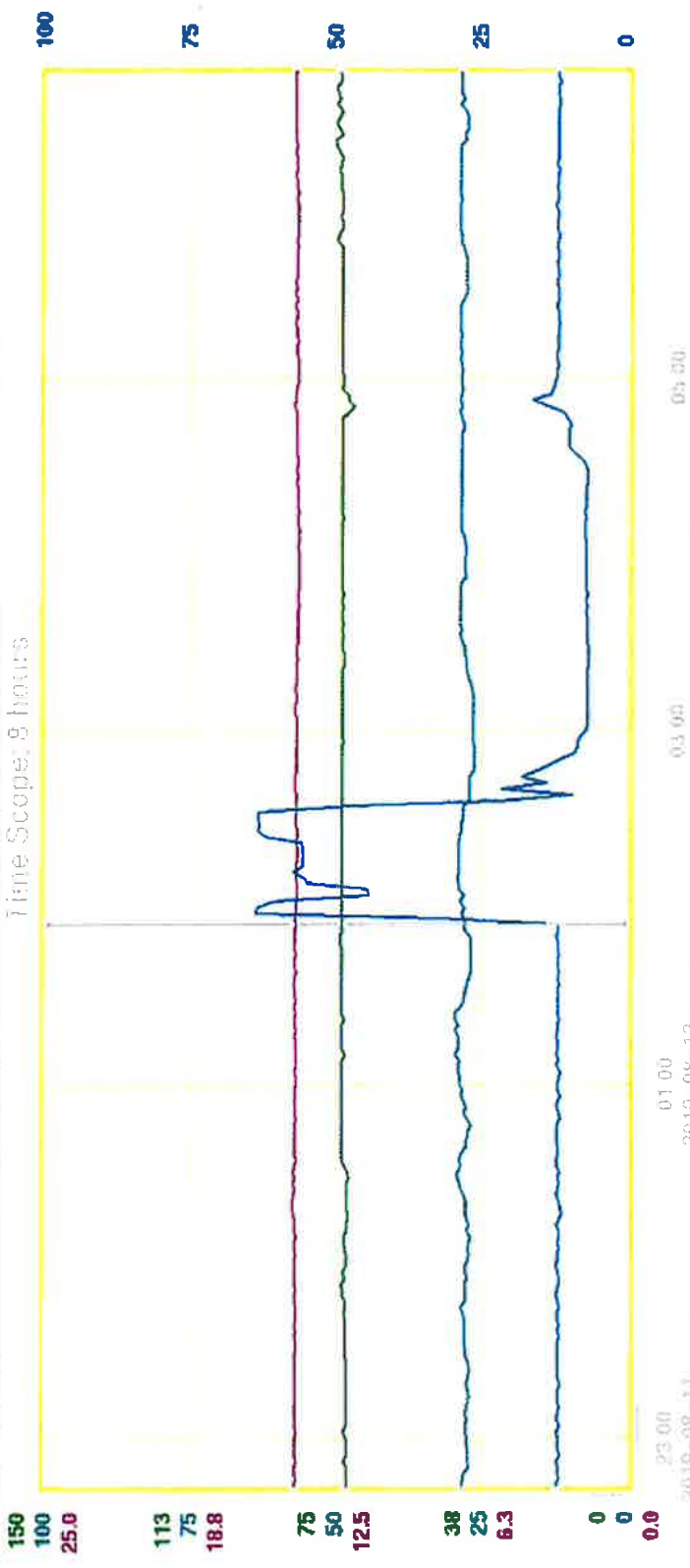
8/12/2018 7:00      8/11/2018 7:00

Time	Dust Burner MSO2/H	Turbo MSO2/H	Mach Burner MSO2/H	SCR Temperature °F	SCR Flow ppm	Ammonia Usage lb/h	Inlet NOx ppm (dry)	Injection Rate lb/h	Steam to Leak Rate lb/h	NOx lb/h	Stack CO ppm	Stack CO %	Stack CO lb/h	CO lb/h	Stack NOx ppm	3h Running Average NOx	Microbial CO %	Microbial NOx ppm	Microbial Corrected NOx (ppm) (2% O2)	Daily Av. Caprihala		
																				NOx lb/h	CO lb/h	
8:20	265.49	73.09	18.19	500.57	0.00	18.19	0.72	2.33	0.72	10.45	14.64	14.64	18.47	10.45	20.70	10.49	20.70	0.00	0.00	11.46	11.46	
9:00	265.01	73.45	18.23	680.14	0.00	18.23	0.67	2.34	0.72	10.61	14.07	14.07	25.64	10.61	20.67	10.50	20.67	0.00	0.00	11.46	11.46	
10:00	265.35	74.45	18.32	685.35	0.00	18.32	0.63	2.34	0.72	10.57	14.05	14.05	25.44	10.57	20.63	10.50	20.63	0.00	0.00	11.46	11.46	
11:00	265.87	74.45	18.00	650.82	0.00	18.00	0.65	2.34	0.72	10.97	14.33	14.33	23.48	10.97	20.69	10.81	20.69	0.00	0.00	11.46	11.46	
12:00	265.18	74.48	18.19	650.87	0.00	18.19	0.69	2.34	0.72	10.58	14.31	14.31	23.38	10.58	20.74	10.60	20.74	0.00	0.00	11.46	11.46	
13:00	265.33	74.38	18.25	687.84	0.00	18.25	0.65	2.41	0.73	10.75	14.29	14.29	23.22	10.75	20.75	10.59	20.75	0.00	0.00	11.46	11.46	
14:00	265.51	74.64	18.27	658.10	0.00	18.27	0.65	2.41	0.73	10.78	14.22	14.22	23.19	10.78	20.78	10.51	20.78	0.00	0.00	11.46	11.46	
15:00	265.76	74.45	18.25	659.06	0.00	18.25	0.65	2.41	0.73	10.68	14.22	14.22	23.03	10.68	20.63	10.53	20.63	0.00	0.00	11.46	11.46	
16:00	265.23	74.75	18.26	659.03	0.00	18.26	0.65	2.36	0.73	10.53	14.20	14.20	22.81	10.53	20.65	10.44	20.65	0.00	0.00	11.46	11.46	
17:00	267.20	74.76	18.27	658.95	0.00	18.27	0.66	2.36	0.73	10.60	14.19	14.19	21.25	10.60	20.84	10.47	20.84	0.00	0.00	11.46	11.46	
18:00	267.71	74.43	18.25	658.59	0.00	18.25	0.65	2.36	0.72	10.81	14.18	14.18	24.55	10.81	20.81	10.46	20.81	0.00	0.00	11.46	11.46	
19:00	266.35	74.41	18.14	688.04	0.00	18.14	0.62	2.35	0.72	10.81	14.18	14.18	24.86	10.81	20.81	10.50	20.81	0.00	0.00	11.46	11.46	
20:00	266.66	74.11	18.10	687.05	0.00	18.10	0.65	2.36	0.72	10.88	14.19	14.19	24.86	10.88	20.74	10.50	20.74	0.00	0.00	11.46	11.46	
21:00	267.54	74.14	18.08	689.78	0.00	18.08	0.64	2.37	0.73	10.75	14.17	14.17	25.18	10.75	20.81	10.59	20.81	0.00	0.00	11.46	11.46	
22:00	268.60	73.76	18.65	687.25	0.00	18.65	0.63	2.37	0.73	10.71	14.22	14.22	24.80	10.71	20.73	10.59	20.73	0.00	0.00	11.46	11.46	
23:00	267.54	73.31	17.63	650.35	0.00	17.63	0.65	2.37	0.72	10.70	14.23	14.23	25.01	10.70	20.71	10.59	20.71	0.00	0.00	11.46	11.46	
7:07	266.52	72.91	17.62	655.08	0.00	17.62	0.65	2.34	0.72	10.53	14.26	14.26	24.56	10.53	20.72	10.53	20.72	0.00	0.00	11.46	11.46	
7:34	264.64	72.99	17.60	653.59	0.00	17.60	0.60	2.32	0.72	10.53	14.26	14.26	24.81	10.53	20.72	10.53	20.72	0.00	0.00	11.46	11.46	
7:07	265.84	73.72	18.25	655.84	0.00	18.25	0.59	2.33	0.72	12.80	14.25	14.25	24.98	12.80	20.77	13.79	20.77	0.00	0.00	11.46	11.46	
7:30	265.35	73.83	8.45	652.00	0.00	8.45	0.30	2.34	0.72	34.90	14.21	14.21	24.50	34.90	20.77	13.79	20.77	0.00	0.00	11.46	11.46	
8:30	265.01	73.47	22.83	650.45	0.00	22.83	0.82	2.30	0.72	8.14	14.18	14.18	24.35	8.14	20.78	11.46	20.78	0.00	0.00	11.46	11.46	
9:00	265.15	73.39	20.10	693.41	0.00	20.10	0.71	2.31	0.71	8.00	14.18	14.18	25.04	8.00	20.75	11.46	20.75	0.00	0.00	11.46	11.46	
9:55	265.35	73.84	17.59	691.18	0.00	17.59	0.64	2.32	0.72	10.75	14.20	14.20	24.99	10.75	20.75	11.46	20.75	0.00	0.00	11.46	11.46	
9:32	264.56	74.01	17.66	691.09	0.00	17.66	0.65	2.31	0.72	10.73	14.24	14.24	25.00	10.73	20.75	11.46	20.75	0.00	0.00	11.46	11.46	
7:00																						

Comments NOx was high on 8/12/19 from 1:55 AM to 2:45 AM because ammonia dilution fan shut off a total of 0.83 hour VCAPCO was notified on 8/12/19 2:50 AM by Howard G.







ON/Name	Description	Attribute	Treatment	Ruler/Time	Ruler/Value	Current Value	Unit	Filter	Time Offset	Form
931AIC111A/NOX	B&W SCR INLET NOX	MV	Mem	01:54	73.88	74.30	PPM			
931AIC111C/CO	B&W BLR STACK RAW CO	MV	Mem	01:54	27.91	28.59	PPM			
931AIC111B/O2	B&W BLR RAW O2%	MV	Mean	01:54	14.24	14.25	%			
931AIC111D/NOX	B&W BLR STACK NOX	MV	Mean	01:54	11.77	11.87	PPM			
931-AIC-111/INCAL	RSMT CEMS IN CAL	MV	Mem	---	---	0				
931-alc-111/arb	RSMT CEMS TROUBLE	MV	Mem	---	---	1				


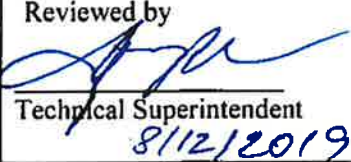
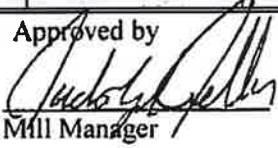
01 30 minutes	02 1 hour	03 9 hours	04 1 day	05 10 days
06 Positioning...	07 Trace Control...	08 Analyze...	09 Trace Config...	10 Extended Config...



CURRENT		PREVIOUS		NEW DEMIN TRALER		AMMONIA DELIVERY		STEAM & WATER READINGS				GAS & ELECTRIC READINGS				BOILER TEST RESULTS					
PERMEATE H <sub>2</sub> O		CONCENTRATE H <sub>2</sub> O		IP		HP		SCG LP		TURBINE		DUCT BURNER		MAGAWATS		DAY SHIFT		NIGHT SHIFT			
0819 105		9011048		210370		1962		7721480		1435060		1874228		55681		8.3		8.11			
0705 2864		90061336		205340		1896		7771230		1069590		190175		55086		10.5		9.86			
TANK 1		TANK 2		%		%		%		%		%		%		%		%			
NO		NO		NO		NO		NO		NO		NO		NO		NO		NO			
FULL		FULL		FULL		FULL		FULL		FULL		FULL		FULL		FULL		FULL			
TURBINE		7:00		9:00		11:00		13:00		15:00		17:00		19:00		21:00		23:00		5:00	
Inlet Temp		52.8		51.2		50.7		52.3		52.1		52.3		51.3		51.5		50.25		50.4	
Humidity		63		64		65		66		66		66		66		66		66		66	
Vibration (Max)		6.2		6.6		5.3		4.8		4.0		4.6		5.0		5.0		4.9		4.6	
Steam Injection		1.9		1.9		1.9		1.9		1.9		1.9		1.9		1.9		1.9		1.9	
Turbine L.O. Level		2.2		2.2		2.2		2.2		2.2		2.2		2.2		2.2		2.2		2.2	
T54		100		99		97		95		95		95		95		95		95		96	
BATTERIES		1429		1429		1429		1429		1429		1429		1429		1429		1429		1429	
AIR INLET DIF		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6	
AIR INLET DIF		7.2		7.2		7.2		7.2		7.2		7.2		7.2		7.2		7.2		7.2	
L.O. DIFFERENTIAL		5		5		5		5		5		5		5		5		5		5	
BOILER FEED WATER PUMP OPERATION		NO		NO		NO		NO		NO		NO		NO		NO		NO		NO	
GEN. BEARING DRAIN		1.5		1.5		1.5		1.5		1.5		1.5		1.5		1.5		1.5		1.5	
L.O. SUPPLY		1.3		1.3		1.3		1.3		1.3		1.3		1.3		1.3		1.3		1.3	
GEN. VIBRATION (MAX)		3.4		3.4		3.4		3.4		3.4		3.4		3.4		3.4		3.4		3.4	
TIE LINE		11.0		11.0		11.0		11.0		11.0		11.0		11.0		11.0		11.0		11.0	
GENERATOR VOLTAGE		11.5		11.5		11.5		11.5		11.5		11.5		11.5		11.5		11.5		11.5	
GEN.		115		115		115		115		115		115		115		115		115		115	
FIELD		198		198		198		198		198		198		198		198		198		198	
COOLING TWR INLET		74		74		74		74		74		74		74		74		74		74	
COOLING TWR OUTLET		58		58		58		58		58		58		58		58		58		58	
450 HEADER TEMP		710		710		710		710		710		710		710		710		710		710	
HP DRUM LEVEL		1.3		1.3		1.3		1.3		1.3		1.3		1.3		1.3		1.3		1.3	
LP DRUM LEVEL		0.2		0.2		0.2		0.2		0.2		0.2		0.2		0.2		0.2		0.2	
HP DRUM PRESSURE		468		475		475		475		475		475		475		475		475		475	
LP DRUM PRESSURE		153		153		153		153		153		153		153		153		153		153	
CO		2.8		2.8		2.8		2.8		2.8		2.8		2.8		2.8		2.8		2.8	
NOX		10.4		10.4		10.4		10.4		10.4		10.4		10.4		10.4		10.4		10.4	
O <sub>2</sub>		14.4		14.4		14.4		14.4		14.4		14.4		14.4		14.4		14.4		14.4	
HOT WELL LEVEL		15.4		15.4		15.4		15.4		15.4		15.4		15.4		15.4		15.4		15.4	
GEN.		800		800		800		800		800		800		800		800		800		800	
450 HEADER TEMP		710		710		710		710		710		710		710		710		710		710	
HP DRUM LEVEL		1.4		1.4		1.4		1.4		1.4		1.4		1.4		1.4		1.4		1.4	
LP DRUM LEVEL		0.3		0.3		0.3		0.3		0.3		0.3		0.3		0.3		0.3		0.3	
HP DRUM PRESSURE		475		475		475		475		475		475		475		475		475		475	
LP DRUM PRESSURE		153		153		153		153		153		153		153		153		153		153	
CO		2.5		2.5		2.5		2.5		2.5		2.5		2.5		2.5		2.5		2.5	
NOX		10.4		10.4		10.4		10.4		10.4		10.4		10.4		10.4		10.4		10.4	
O <sub>2</sub>		14.4		14.4		14.4		14.4		14.4		14.4		14.4		14.4		14.4		14.4	
HOT WELL LEVEL		14		14		14		14		14		14		14		14		14		14	
AUTO / ON / OFF		4.5		4.5		4.5		4.5		4.5		4.5		4.5		4.5		4.5		4.5	
DUCT BURNER		1103 B SET POINT		1103 B SET POINT		1103 B SET POINT		1103 B SET POINT		1103 B SET POINT		1103 B SET POINT		1103 B SET POINT		1103 B SET POINT		1103 B SET POINT		1103 B SET POINT	
DUCT BURNER		5.5		5.5		5.5		5.5		5.5		5.5		5.5		5.5		5.5		5.5	
S/P		442		442		442		442		442		442		442		442		442		442	
5.0		5.0		5.0		5.0		5.0		5.0		5.0		5.0		5.0		5.0		5.0	
7:00		9:00		11:00		13:00		15:00		17:00		19:00		21:00		23:00		5:00		5:00	
2.7		2.7		2.7		2.7		2.7		2.7		2.7		2.7		2.7		2.7		2.7	
4.0		4.0		4.0		4.0		4.0		4.0		4.0		4.0		4.0		4.0		4.0	
CRANKCASE OIL LEVEL		760		760		760		760		760		760		760		760		760		760	
CRANKCASE OIL LEVEL		760		760		760		760		760		760		760		760		760		760	
FRAME OIL PRESSURE (25-50) PSI		2.5		2.5		2.5		2.5		2.5		2.5		2.5		2.5		2.5		2.5	
TEMP. COOLING		F		F		F		F		F		F		F		F		F		F	
TEMP. COOLING		F		F		F		F		F		F		F		F		F		F	
12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6	
11		11		11		11		11		11		11		11		11		11		11	
70		70		70		70		70		70		70		70		70		70		70	
12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6	
12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6	
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12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6	
12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6	
12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6	
12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6	
12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6	
12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6	
12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6	
12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6	
12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6		12.6	
12.6		12.6		12.6		1															

# New-Indy Oxnard Environmental Incident Report

Shaded section to be completed by the EMR

Name of Incident: Excess NOx Emission		Incident Date: 08/12/2019	
Exact Location Incident Cogen area			
Reported By: Howard Gastelum	Estimated Start and Stop Times of Incident: 8/12/19 1:55 AM – 2:45 AM		Possible Cause: Electrical control fluctuations
Incident Type: <input type="checkbox"/> Spill Internal <input type="checkbox"/> Improper Waste Disposal <input type="checkbox"/> Spill External <input type="checkbox"/> Near miss or below spill release guidelines <input checked="" type="checkbox"/> Air Emission <input type="checkbox"/> Other _____		Released To <input type="checkbox"/> Storm Water System <input type="checkbox"/> Secondary Containment <input type="checkbox"/> Process Sewer <input checked="" type="checkbox"/> Air <input type="checkbox"/> Ground (External) <input type="checkbox"/> Ground (Inside Mill Property) <input type="checkbox"/> Near Miss <input type="checkbox"/> Other _____	
Detailed Description of Event  On 8/12/19, at 1:55 AM, the plant experienced electrical control fluctuations. Equipment shut off due to these fluctuations including the ammonia dilution fan for the Cogen SCR. Control was re-established at 2:45 AM and VCAPCD breakdown hotline was notified of potential excess NOx emissions.  (if required use additional paper and attach)			
Estimated Amount Released		pH	CONSISTENCY (%)
<input type="checkbox"/> _____ Gallons <input type="checkbox"/> _____ Pounds <input checked="" type="checkbox"/> Other: Zero _____			
List Any External Emergency Clean Up Personnel Contacted N/A		List Any External Agencies Contacted (Agency, person and time of call.) VCAPCD at 2:50 AM	
List Hueneme Personnel Contacted (Foreman, Mill Manager, etc.) Environmental Engineer, E&I Supervisor		Any Acute or Chronic Health Risks (refer to MSDS) No	
Describe Any Emergency Response Actions Re-established control			
Suggestions to Prevent Reoccurrence			Estimated Completion Date
1. Investigation in progress to determine cause of electrical control fluctuations			1. 9/13/19
2.			2.
3.			3.
4.			4.
Root Cause after investigation: Cause of electrical control fluctuations is under investigation.		Severity Level (level 1 and 2 must be tracked through SHIMS) <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4	
Investigated By: E&I		Investigated Date 8/12/19 - ongoing	
Follow Up		By When	Completion Date
Issued by  Department Manager 8/12/2019	Reviewed by  Technical Superintendent 8/12/2019	Approved by  Mill Manager 8/12/2019	

Print Time: 8/12/2019 9:37:49 AM

Note: This document is valid for only ONE week after print time!

# NEW INDY

CONTAINERBOARD

November 14, 2019

Ventura County Air Pollution Control District  
669 County Square Drive, Second Floor  
Ventura, CA 93003

Attention: Ed Swede  
Subject: Continuous Emission Monitoring System (CEMS) - Invalid data

Dear Mr. Swede:

New-Indy Oxnard is submitting this follow-up report for the call made to VCAPCD Hotline by the undersigned on November 13, 2019 at 9:35 AM.

On November 13 at 9:00 AM, during the daily emission review, it was found that the cogen operations had invalid emission data during CEMS preventive maintenance performed on November 12. During maintenance, E&I Technicians checked the lines and replaced two sets of tubing and the ammonia scrubber. Initial calibration was completed right after the maintenance but it did not pass due to poor air gas flow. After troubleshooting, the technician found that the installed scrubber was not working properly. Installing a different ammonia scrubber resolved the gas flow issue. The unit was recalibrated and successful calibrations were completed by 5:28 PM. There were no valid emission data on November 12 from 1:26 PM to 5:28 PM, a total of 4.03 hours.

The Daily Emission Sheets, PI trends, ABB trends, Cogen Daily Log, and Environmental Incident Report have been provided for your review. If you have any questions or require any additional information, please call me at (805) 271-7271.

Sincerely,



Zhen Han  
Process Engineer

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**NEW INDY OXNARD, LLC**

5936 PERKINS ROAD • OXNARD, CALIFORNIA 93033 • WWW.NEWINDYCONTAINERBOARD.COM  
PHONE (805) 986-3881 • FAX (805) 488-5186



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:

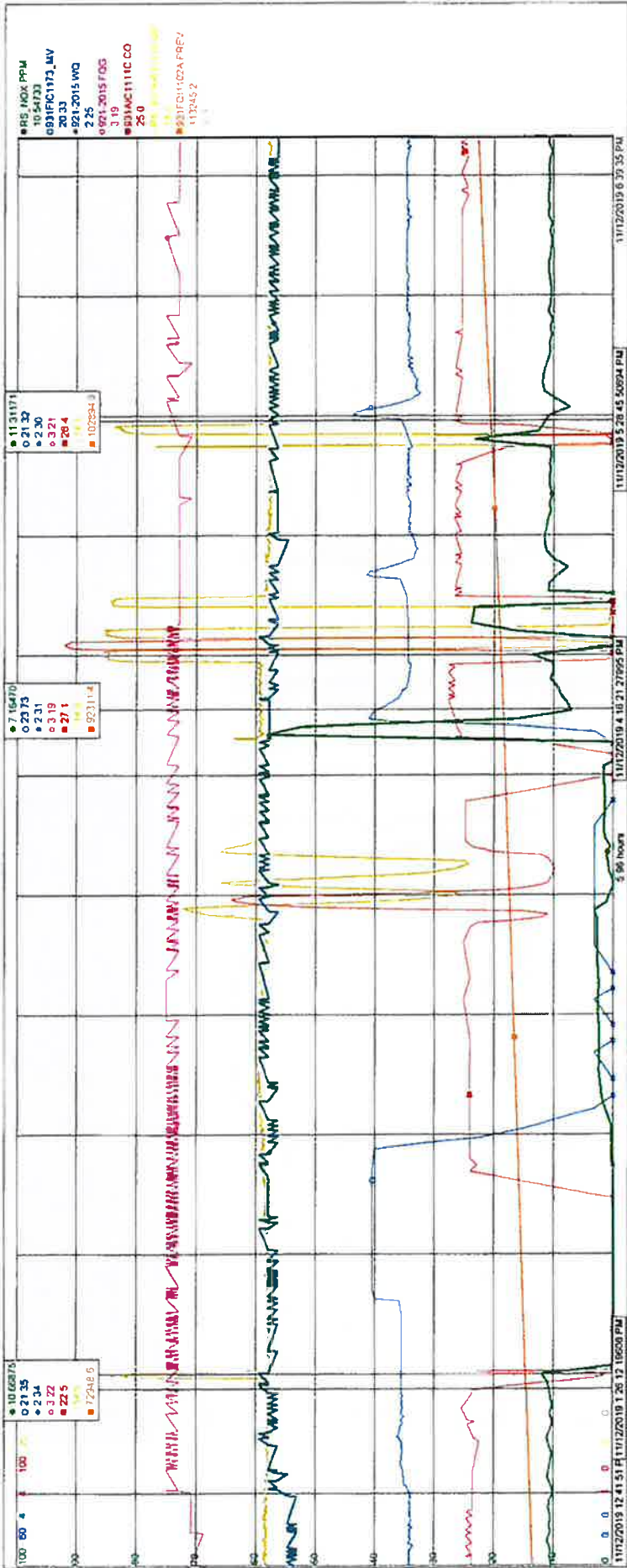
Air Quality Engineer  
Ventura County Air Pollution Control District  
669 County Square Drive  
Ventura, CA 93003

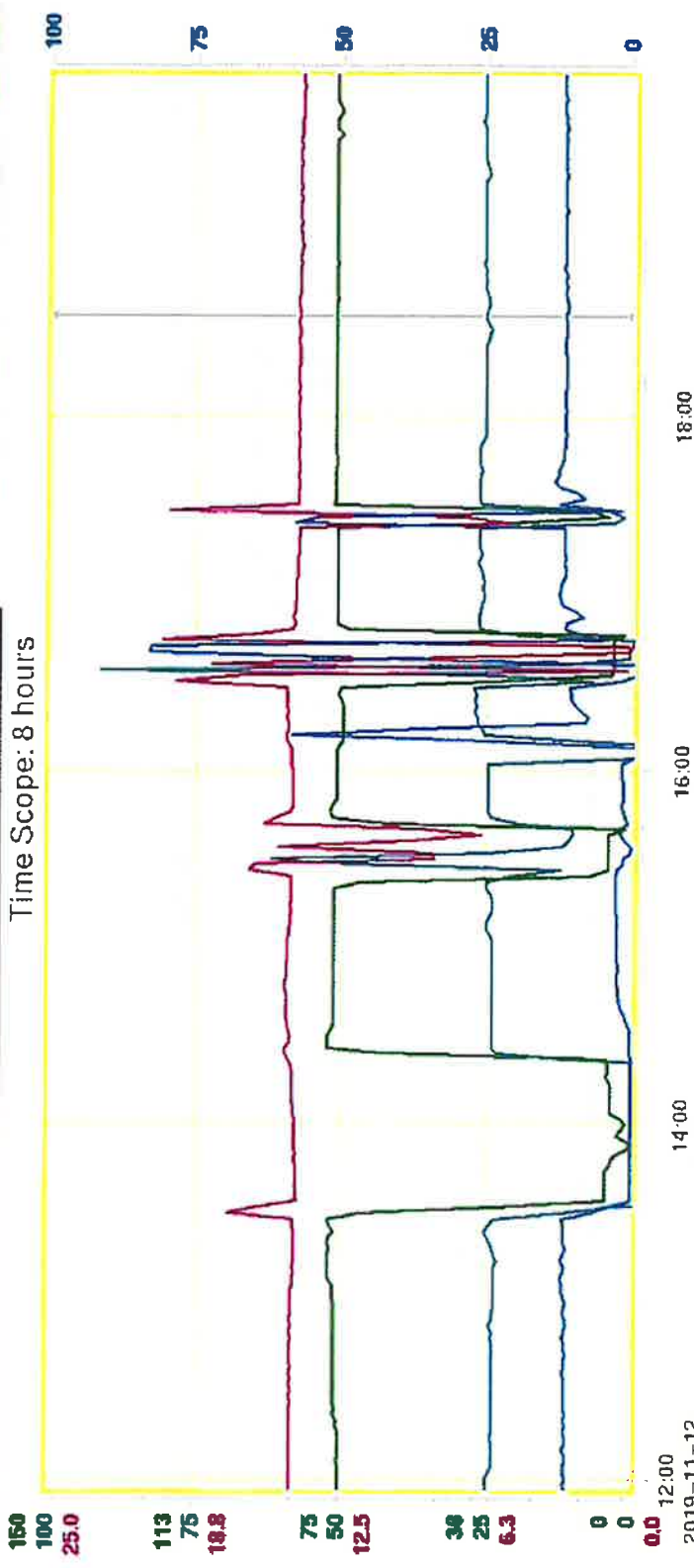
### Certification by Responsible Official

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: <u></u>	<u></u>
Title: <u>Mill Manager</u>	11/14/2019







ON/Name	Description	Attribute	Treatment	Ruler Time	Ruler Value	Current Value	Unit	Filter	Time Offset	Form
001AIG1111A:NOX	B&W SCR INLET NOX	MV	Mem	10:34/2019-11-12	78.92	78.28	PPPM			
001AIG1111C:O2	B&W BLR STACK RAW CO	MV	Mem	10:34/2019-11-12	25.47	24.31	PPPM			
001AIG1111B:O2	B&W BLR RAW O2%	MV	Mean	10:34/2019-11-12	14.38	14.58	%			
001AIG1111D:NOX	B&W BLR STACK NOX	MV	Mean	10:34/2019-11-12	11.57	11.44	PPPM			
001-AIG-1111:INCAL	RSMT CEMS IN CAL	MV	Mem			0				
001-ajc-1111:trb	RSMT CEMS TROUBLE	MV	Mem			1				

01	30 minutes	03	1 hour	04	1 day	05	10 days	
06	Positioning...	07	Trace Control...	08	Analyze...	09	Trace Config...	
							10	Extended Config...

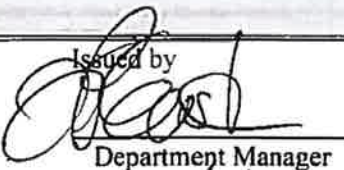
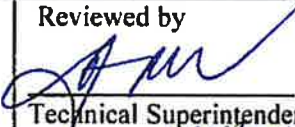
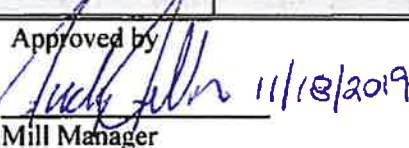




PERMATE H2O		CONCENTRATE H2O		LP		HP		SCC LP		TURBINE		MAXON		DUCT BURNER		MEGAWATT																																																																																																																																																																																																																																																																																																	
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53793	53793	9444546	218634	1957	0010450	9587650	290650	2807190	290650	00054																																																																																																																																																																																																																																																																																																							
<p>NEW DEMIN TRAILER YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> TANK 1 % FULL 44/46 TANK 2 % FULL 44/46 CHILLER HOURS: 104,490:10:48</p> <p>AMMONIA DELIVERY YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> PACSEITER (ON) OFF ALARM: RED <input checked="" type="checkbox"/> YELLOW <input type="checkbox"/> GREEN <input type="checkbox"/></p>																																																																																																																																																																																																																																																																																																																	
<p><b>TURBINE</b></p> <table border="1"> <tr> <td>FAV</td> <td>%</td> <td>7:00</td> <td>9:00</td> <td>11:00</td> <td>13:00</td> <td>15:00</td> <td>17:00</td> <td>19:00</td> <td>21:00</td> <td>23:00</td> <td>5:00</td> <td>5:00</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Inlet Temp</td> <td>%</td> <td>44.08</td> <td>45.00</td> <td>46.19</td> <td>46.81</td> <td>50.19</td> <td>48.67</td> <td>47.81</td> <td>49.81</td> <td>45.38</td> <td>44.69</td> <td>48.94</td> <td>47-88</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Humidity</td> <td>%</td> <td>62</td> <td>63</td> <td>67</td> <td>68</td> <td>68</td> <td>68</td> <td>64</td> <td>67</td> <td>64</td> <td>62</td> <td>62</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Vibration (Max)</td> <td>MILS</td> <td>0.75</td> <td>0.66</td> <td>0.75</td> <td>0.70</td> <td>0.69</td> <td>0.68</td> <td>0.78</td> <td>0.66</td> <td>0.65</td> <td>0.64</td> <td>0.64</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Steam Injection</td> <td>1/SEC</td> <td>2.06</td> <td>2.06</td> <td>2.19</td> <td>2.31</td> <td>2.25</td> <td>2.25</td> <td>2.27</td> <td>2.25</td> <td>2.25</td> <td>2.25</td> <td>2.25</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Turbine L.O. Level</td> <td>%</td> <td>98</td> <td>98</td> <td>98</td> <td>97</td> <td>95</td> <td>95</td> <td>95</td> <td>95</td> <td>95</td> <td>95</td> <td>95</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>T64</td> <td>%</td> <td>1432</td> <td>1438</td> <td>1458</td> <td>1468</td> <td>1490</td> <td>1496</td> <td>1472</td> <td>1491</td> <td>1477</td> <td>1476</td> <td>1465</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>																		FAV	%	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	5:00	5:00						Inlet Temp	%	44.08	45.00	46.19	46.81	50.19	48.67	47.81	49.81	45.38	44.69	48.94	47-88					Humidity	%	62	63	67	68	68	68	64	67	64	62	62						Vibration (Max)	MILS	0.75	0.66	0.75	0.70	0.69	0.68	0.78	0.66	0.65	0.64	0.64						Steam Injection	1/SEC	2.06	2.06	2.19	2.31	2.25	2.25	2.27	2.25	2.25	2.25	2.25						Turbine L.O. Level	%	98	98	98	97	95	95	95	95	95	95	95						T64	%	1432	1438	1458	1468	1490	1496	1472	1491	1477	1476	1465																																																																																																																																																																							
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<p><b>GENERATOR</b></p> <table border="1"> <tr> <td>Gen Bearing Drain</td> <td>F</td> <td>7:00</td> <td>9:00</td> <td>11:00</td> <td>13:00</td> <td>15:00</td> <td>17:00</td> <td>19:00</td> <td>21:00</td> <td>23:00</td> <td>5:00</td> <td>5:00</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>L.O. Supply</td> <td>F</td> <td>153</td> <td>163</td> <td>153</td> <td>153</td> <td>153</td> <td>154</td> <td>153</td> <td>153</td> <td>152</td> <td>152</td> <td>152</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Gen. Vibration (Max)</td> <td>IPS</td> <td>0.32</td> <td>0.30</td> <td>0.31</td> <td>0.32</td> <td>0.32</td> <td>0.33</td> <td>0.33</td> <td>0.33</td> <td>0.33</td> <td>0.33</td> <td>0.32</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>The Line</td> <td>MW</td> <td>10.69</td> <td>10.68</td> <td>10.98</td> <td>10.94</td> <td>10.95</td> <td>10.91</td> <td>11.05</td> <td>10.98</td> <td>10.98</td> <td>10.91</td> <td>10.91</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Generator Voltage</td> <td>KV</td> <td>12.81</td> <td>12.81</td> <td>12.81</td> <td>12.81</td> <td>12.81</td> <td>12.80</td> <td>12.80</td> <td>12.80</td> <td>12.80</td> <td>12.80</td> <td>12.80</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>																		Gen Bearing Drain	F	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	5:00	5:00						L.O. Supply	F	153	163	153	153	153	154	153	153	152	152	152						Gen. Vibration (Max)	IPS	0.32	0.30	0.31	0.32	0.32	0.33	0.33	0.33	0.33	0.33	0.32						The Line	MW	10.69	10.68	10.98	10.94	10.95	10.91	11.05	10.98	10.98	10.91	10.91						Generator Voltage	KV	12.81	12.81	12.81	12.81	12.81	12.80	12.80	12.80	12.80	12.80	12.80																																																																																																																																																																																																											
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Gen. Vibration (Max)	IPS	0.32	0.30	0.31	0.32	0.32	0.33	0.33	0.33	0.33	0.33	0.32																																																																																																																																																																																																																																																																																																					
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Generator Voltage	KV	12.81	12.81	12.81	12.81	12.81	12.80	12.80	12.80	12.80	12.80	12.80																																																																																																																																																																																																																																																																																																					
<p><b>COGEN BOILER</b></p> <table border="1"> <tr> <td>450 Header Temp</td> <td>F</td> <td>7:00</td> <td>9:00</td> <td>11:00</td> <td>13:00</td> <td>15:00</td> <td>17:00</td> <td>19:00</td> <td>21:00</td> <td>23:00</td> <td>5:00</td> <td>5:00</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>HP Drum Level</td> <td>IN</td> <td>2.2</td> <td>2.0</td> <td>1.0</td> <td>1.1</td> <td>0.9</td> <td>0.9</td> <td>1.1</td> <td>0.8</td> <td>0.8</td> <td>0.8</td> <td>0.9</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>LP Drum Level</td> <td>IN</td> <td>0.7</td> <td>0.4</td> <td>0.4</td> <td>0.4</td> <td>0.6</td> <td>0.5</td> <td>0.5</td> <td>0.5</td> <td>0.5</td> <td>0.5</td> <td>0.5</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>HP Drum Pressure</td> <td>PSI</td> <td>13.8</td> <td>16.0</td> <td>15.2</td> <td>15.2</td> <td>15.2</td> <td>15.2</td> <td>15.2</td> <td>15.2</td> <td>15.2</td> <td>15.2</td> <td>15.2</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>LP Drum Pressure</td> <td>PPM</td> <td>2.8</td> <td>2.9</td> <td>2.5</td> <td>2.2</td> <td>2.1</td> <td>2.1</td> <td>2.2</td> <td>2.4</td> <td>2.2</td> <td>2.2</td> <td>2.2</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>CO</td> <td>PPM</td> <td>10.7</td> <td>10.1</td> <td>10.7</td> <td>10.7</td> <td>10.7</td> <td>10.6</td> <td>10.7</td> <td>10.7</td> <td>10.7</td> <td>10.7</td> <td>10.7</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>NOx</td> <td>%</td> <td>14.74</td> <td>14.70</td> <td>14.53</td> <td>14.67</td> <td>14.67</td> <td>14.57</td> <td>14.57</td> <td>14.57</td> <td>14.57</td> <td>14.57</td> <td>14.57</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Hot Well Level</td> <td>%</td> <td>145</td> <td>149</td> <td>145</td> <td>152</td> <td>152</td> <td>158</td> <td>161</td> <td>154</td> <td>15</td> <td>159</td> <td>134</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>450 Header Temp</td> <td>F</td> <td>7:00</td> <td>9:00</td> <td>11:00</td> <td>13:00</td> <td>15:00</td> <td>17:00</td> <td>19:00</td> <td>21:00</td> <td>23:00</td> <td>5:00</td> <td>5:00</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>HP Drum Level</td> <td>IN</td> <td>0.2</td> <td>0.9</td> <td>0.9</td> <td>0.9</td> <td>0.9</td> <td>0.8</td> <td>0.9</td> <td>0.9</td> <td>0.9</td> <td>0.9</td> <td>0.9</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>LP Drum Level</td> <td>IN</td> <td>0.1</td> <td>0.3</td> <td>0.4</td> <td>0.4</td> <td>0.5</td> <td>0.5</td> <td>0.6</td> <td>0.6</td> <td>0.6</td> <td>0.6</td> <td>0.6</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>HP Drum Pressure</td> <td>PSI</td> <td>14.4</td> <td>15.7</td> <td>15.2</td> <td>15.2</td> <td>15.2</td> <td>15.2</td> <td>15.2</td> <td>15.2</td> <td>15.2</td> <td>15.2</td> <td>15.2</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>LP Drum Pressure</td> <td>PPM</td> <td>28.3</td> <td>26.9</td> <td>23.5</td> <td>21.6</td> <td>21.6</td> <td>21.6</td> <td>22.1</td> <td>22.5</td> <td>22.2</td> <td>22.2</td> <td>22.2</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>CO</td> <td>PPM</td> <td>10.4</td> <td>10.8</td> <td>10.7</td> <td>10.6</td> <td>10.6</td> <td>10.6</td> <td>10.8</td> <td>10.8</td> <td>10.8</td> <td>10.8</td> <td>10.8</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>NOx</td> <td>%</td> <td>14.67</td> <td>14.63</td> <td>14.64</td> <td>14.64</td> <td>14.64</td> <td>14.64</td> <td>14.64</td> <td>14.64</td> <td>14.64</td> <td>14.64</td> <td>14.64</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Hot Well Level</td> <td>%</td> <td>144</td> <td>138</td> <td>136</td> <td>151</td> <td>161</td> <td>164</td> <td>161</td> <td>156</td> <td>159</td> <td>152</td> <td>134</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>																		450 Header Temp	F	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	5:00	5:00						HP Drum Level	IN	2.2	2.0	1.0	1.1	0.9	0.9	1.1	0.8	0.8	0.8	0.9						LP Drum Level	IN	0.7	0.4	0.4	0.4	0.6	0.5	0.5	0.5	0.5	0.5	0.5						HP Drum Pressure	PSI	13.8	16.0	15.2	15.2	15.2	15.2	15.2	15.2	15.2	15.2	15.2						LP Drum Pressure	PPM	2.8	2.9	2.5	2.2	2.1	2.1	2.2	2.4	2.2	2.2	2.2						CO	PPM	10.7	10.1	10.7	10.7	10.7	10.6	10.7	10.7	10.7	10.7	10.7						NOx	%	14.74	14.70	14.53	14.67	14.67	14.57	14.57	14.57	14.57	14.57	14.57						Hot Well Level	%	145	149	145	152	152	158	161	154	15	159	134						450 Header Temp	F	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	5:00	5:00						HP Drum Level	IN	0.2	0.9	0.9	0.9	0.9	0.8	0.9	0.9	0.9	0.9	0.9						LP Drum Level	IN	0.1	0.3	0.4	0.4	0.5	0.5	0.6	0.6	0.6	0.6	0.6						HP Drum Pressure	PSI	14.4	15.7	15.2	15.2	15.2	15.2	15.2	15.2	15.2	15.2	15.2						LP Drum Pressure	PPM	28.3	26.9	23.5	21.6	21.6	21.6	22.1	22.5	22.2	22.2	22.2						CO	PPM	10.4	10.8	10.7	10.6	10.6	10.6	10.8	10.8	10.8	10.8	10.8						NOx	%	14.67	14.63	14.64	14.64	14.64	14.64	14.64	14.64	14.64	14.64	14.64						Hot Well Level	%	144	138	136	151	161	164	161	156	159	152	134					
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CO	PPM	10.7	10.1	10.7	10.7	10.7	10.6	10.7	10.7	10.7	10.7	10.7																																																																																																																																																																																																																																																																																																					
NOx	%	14.74	14.70	14.53	14.67	14.67	14.57	14.57	14.57	14.57	14.57	14.57																																																																																																																																																																																																																																																																																																					
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HP Drum Level	IN	0.2	0.9	0.9	0.9	0.9	0.8	0.9	0.9	0.9	0.9	0.9																																																																																																																																																																																																																																																																																																					
LP Drum Level	IN	0.1	0.3	0.4	0.4	0.5	0.5	0.6	0.6	0.6	0.6	0.6																																																																																																																																																																																																																																																																																																					
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LP Drum Pressure	PPM	28.3	26.9	23.5	21.6	21.6	21.6	22.1	22.5	22.2	22.2	22.2																																																																																																																																																																																																																																																																																																					
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NOx	%	14.67	14.63	14.64	14.64	14.64	14.64	14.64	14.64	14.64	14.64	14.64																																																																																																																																																																																																																																																																																																					
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<p><b>COMPRESSORS</b></p> <table border="1"> <tr> <td>Filter Separator</td> <td>PSI</td> <td>7:00</td> <td>9:00</td> <td>11:00</td> <td>13:00</td> <td>15:00</td> <td>17:00</td> <td>19:00</td> <td>21:00</td> <td>23:00</td> <td>5:00</td> <td>5:00</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Gas Receiver</td> <td>PSI</td> <td>235</td> <td>235</td> <td>235</td> <td>235</td> <td>235</td> <td>235</td> <td>235</td> <td>235</td> <td>235</td> <td>235</td> <td>235</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Crane Oil Level %</td> <td>%</td> <td>411</td> <td>408</td> <td>410</td> <td>409</td> <td>410</td> <td>410</td> <td>409</td> <td>409</td> <td>410</td> <td>411</td> <td>410</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Frame Oil Pressure (25-50) PSI</td> <td>PSI</td> <td>65</td> <td>65</td> <td>65</td> <td>65</td> <td>65</td> <td>65</td> <td>65</td> <td>65</td> <td>65</td> <td>65</td> <td>65</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Temp. cooling F</td> <td>F</td> <td>11</td> <td>69</td> <td>72</td> <td>62.2</td> <td>72</td> <td>62.2</td> <td>72</td> <td>62.2</td> <td>72</td> <td>62.2</td> <td>72</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>																		Filter Separator	PSI	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	5:00	5:00						Gas Receiver	PSI	235	235	235	235	235	235	235	235	235	235	235						Crane Oil Level %	%	411	408	410	409	410	410	409	409	410	411	410						Frame Oil Pressure (25-50) PSI	PSI	65	65	65	65	65	65	65	65	65	65	65						Temp. cooling F	F	11	69	72	62.2	72	62.2	72	62.2	72	62.2	72																																																																																																																																																																																																											
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<p>NAME: Wm. Davis / Carlos NAME: 1100 B SET POINT 446 1100 B SET POINT 442 1100 B SET POINT 442</p> <p>DAY SHIFT OPERATOR NIGHT SHIFT OPERATOR</p>																																																																																																																																																																																																																																																																																																																	

## New-Indy Oxnard Environmental Incident Report

Shaded section to be completed by the EMR

Name of Incident <b>Invalid CEMS data during Maintenance</b>		Incident Date <b>11/12/19</b>	
Exact Location Incident <b>Cogen</b>			
Reported By <b>Gary Uribe</b>	Estimated Start and Stop Times of Incident: <b>11/12/19 from 1:26 PM to 4:16 PM</b>		Possible Cause: <b>Maintenance</b>
Incident Type: <input type="checkbox"/> Spill Internal <input type="checkbox"/> Improper Waste Disposal <input type="checkbox"/> Spill External <input type="checkbox"/> Near miss or below spill release guidelines <input checked="" type="checkbox"/> Air Emission <input type="checkbox"/> Other _____		Released To <input type="checkbox"/> Storm Water System <input type="checkbox"/> Secondary Containment <input type="checkbox"/> Process Sewer <input checked="" type="checkbox"/> Air <input type="checkbox"/> Ground (External) <input type="checkbox"/> Ground (Inside Mill Property) <input type="checkbox"/> Near Miss <input type="checkbox"/> Other _____	
Detailed Description of Event Performed PM on the analyzer unit. Notified environmental in the early morning. Also notified COGEN to put emissions in manual before starting PM. Took down unit at 1:26 PM. Checked lines for moisture and replaced 2 sets of tubing and an ammonia scrubber. Put unit back into E1 at 2:22pm. Noticed after starting back up that the NOx reading was low but slowly increasing. Did a manual calibration at 3:20 PM. Calibration did not pass due to poor gas flow. Replaced the ammonia scrubber which resolved the poor sample gas flow issue. Started the unit up at 4:09 PM and performed another calibration at 4:27 PM, but the O2 did not pass. A passing O2 calibration was completed at 5:21 PM and CEMS was back online at 5:28 PM. (if required use additional paper and attach)			
Estimated Amount Released	pH	CONSISTENCY (%)	Estimated Monetary Loss
<input type="checkbox"/> _____ Gallons <input type="checkbox"/> _____ Pounds			
<input type="checkbox"/> Other _____			No. of Emergency Sandbags used <input type="checkbox"/> _____ Bags <input type="checkbox"/> N/A
After event, Sandbags Removed/Disposed			
<input type="checkbox"/> Yes <input type="checkbox"/> No			
List Any External Emergency Clean Up Personnel Contacted N/A		List Any External Agencies Contacted (Agency, person and time of call.) VACAPCD on 11/13/19 at 9:35 AM	
List Hueneme Personnel Contacted (Foreman, Mill Manager, etc.) Robyn Lebrilla		Any Acute or Chronic Health Risks (refer to MSDS) N/A	
Describe Any Emergency Response Actions			
Suggestions to Prevent Reoccurrence			Estimated Completion Date
1. CEMS PM will be scheduled during Cogen shutdowns (if possible)			1. On going
2. Air flow will be checked for each ammonia scrubber prior to install			2. 11/13/19
3.			3.
4.			4.
Root Cause after investigation		Severity Level (level 1 and 2 must be tracked through SHIMS)	
Defective ammonia scrubber		<input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4	
Investigated By <b>Gary Uribe</b>		Investigated Date <b>11/13/19</b>	
Follow Up		By When	Completion Date
Issued by  Department Manager 11/18/19	Reviewed by  Technical Superintendent 11/18/2019	Approved by  11/18/2019 Mill Manager	

Print Time: 11/18/2019 8:18:25 AM

Note: This document is valid for only ONE week after print time!

# NEW INDY

CONTAINERBOARD

December 31, 2019

Ventura County Air Pollution Control District  
669 County Square Drive, Second Floor  
Ventura, CA 93003

Attention: Ed Swede

Subject: Continuous Emission Monitoring System (CEMS) - Invalid Inlet NOx data

Dear Mr. Swede:

New-Indy Oxnard is submitting this follow-up report for the call made by Victor Kumpera to the VCAPCD Breakdown Center Hotline on December 25, 2019 at 5:30 PM.

On December 25 at 12:07 PM, the mill lost SCE power. The turbine was back online at 3:08 PM, however, the CEMS was observed collecting invalid inlet NOx data. It was found that the inlet NOx Chemiluminescence Detector (CLD) was damaged during the power surge. The CLD was replaced on December 26 at 8:24 AM but the spare CLD did not work properly. On December 27, the mill brought in a contractor to help resolve the issue. The inlet NOx unit was reconfigured and the unit was back online at 4:40 PM. The inlet NOx data were lost from December 25, 3:08 PM to December 27, 4:40 PM, a total of 49.5 hours. There were no excess emissions during this period.

The Daily Emission Sheets, PI trends, ABB trends, Cogen Reports and Environmental Incident Report have been provided for your review. If you have any questions or require any additional information, please call me at (805) 271-7284.

Sincerely,



Zhen Han  
Process Engineer

---

**NEW INDY OXNARD, LLC**

5936 PERKINS ROAD • OXNARD, CALIFORNIA 93033 • WWW.NEWINDYCONTAINERBOARD.COM  
PHONE (805) 986-3881 • FAX (805) 488-5186



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:

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

### Certification by Responsible Official

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

<p>Signature and Title of Responsible Official:</p> <p>Signature: <u></u></p> <p>Title: <u>Technical Manager</u></p>	<p>Date: <u>12/31/2019</u></p>
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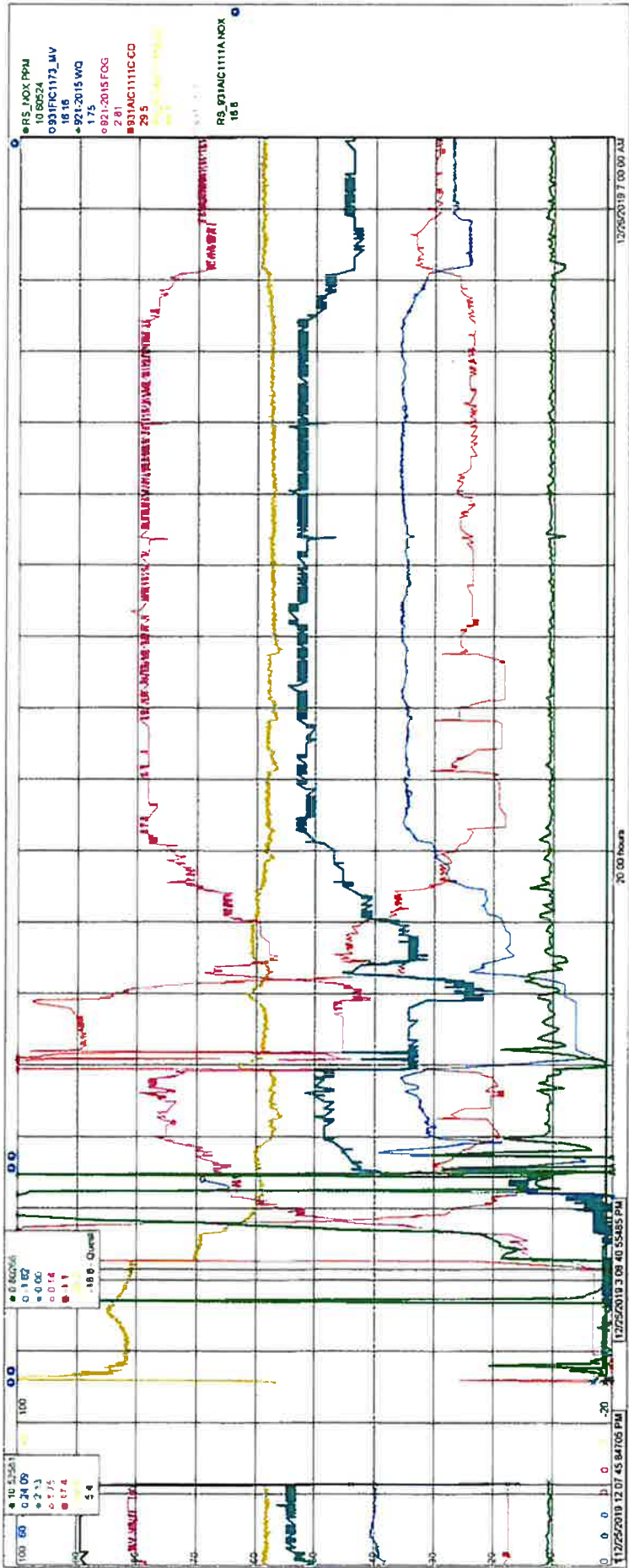
**DAILY ENVIRONMENTAL REPORT**

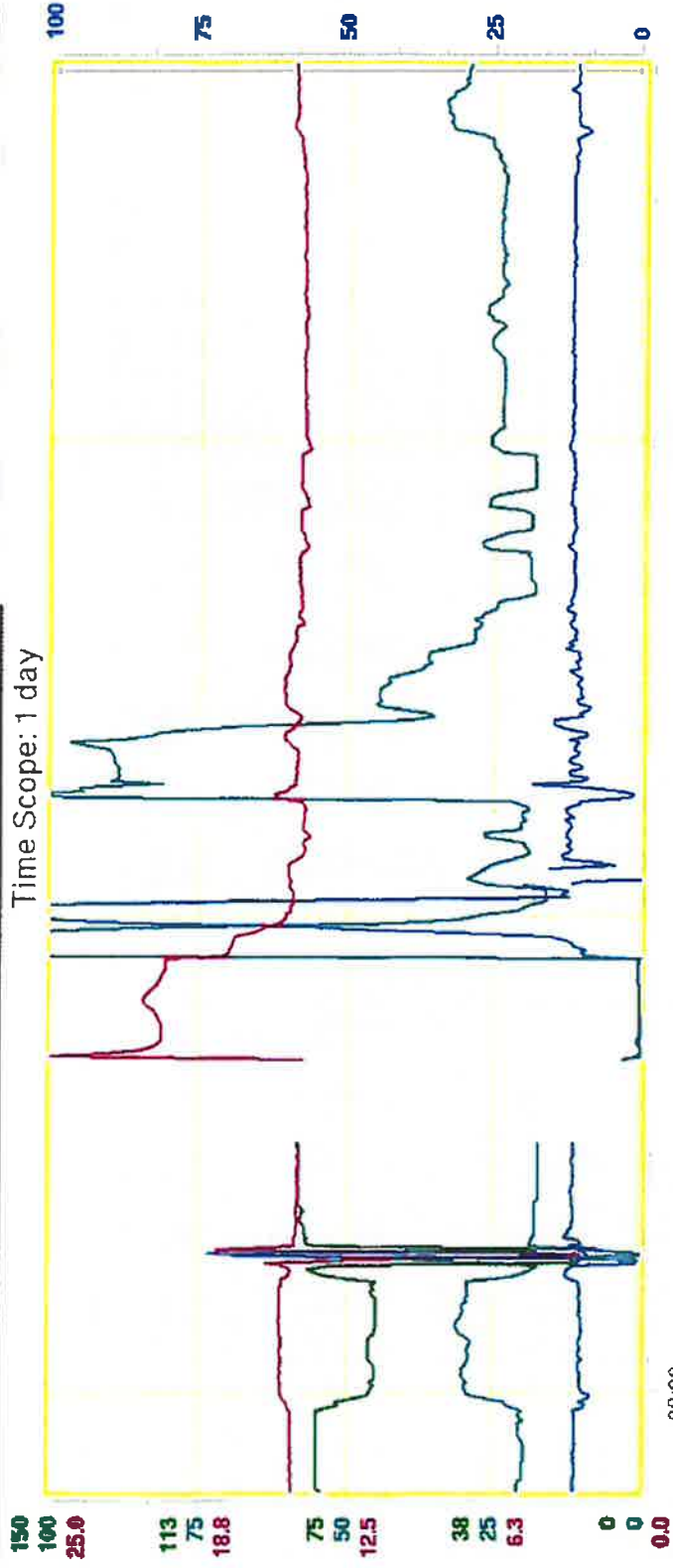
12/25/2019 7:00

12/25/2019 7:00

Time	Euler Burner Job No MFC/FT	Turntable Job No MFC/FT	Magna Burner Job No MFC/FT	SCF Temperature %	EGR Inlet MFC ppm	Airflow L/min ppm	MFC NOx mech ind.	Precision Mean ppm	Oven to Inlet ppm	NOx ppm	Check O2 %	Check CO ppm	Check CO ppm	Check CO ppm	Stack NOx ppm	30 min Average NOx	Hebrelia O2 %	Hebrelia ppm	Hebrelia Corrected MFC (ppm 1.2% O <sub>2</sub> )	Daily Av Cogen		Daily Av Cap/Hub	
																				MFC	ppm	MFC	ppm
8:00	0.00	253.34	0.00	600.50	78.08	21.04	0.72	2.02	0.05	8.80	21.52	12.58	10.10	10.28	20.78	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
9:00	0.78	274.46	0.00	651.60	68.79	15.74	0.71	1.78	0.65	8.98	15.27	30.81	18.18	18.12	20.75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
10:00	0.85	274.38	0.00	650.20	66.49	15.32	0.72	1.80	0.65	9.15	15.26	29.86	15.48	18.83	20.74	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
11:00	0.08	260.20	0.00	676.05	86.70	23.30	0.74	2.06	0.66	10.42	14.60	18.83	10.12	10.84	20.60	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
12:00	0.05	293.86	0.00	673.05	87.00	23.90	0.74	2.14	0.67	10.51	14.55	18.73	9.87	10.53	20.60	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
13:00	0.05	265.33	0.00	682.86	80.64	23.81	0.74	2.12	0.66	10.56	14.55	18.14	9.86	10.54	20.60	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
14:00	-0.06	9.36	0.00	487.20	-18.75	-1.82	6.63	0.08	0.76	0.00	0.34	0.34	0.34	0.34	8.22	-0.78	0.00	0.00	0.00	0.00	0.00	0.00	
15:00	-0.06	66.02	0.00	500.65	-18.75	-1.82	6.63	0.05	0.42	0.00	0.34	0.34	0.34	0.34	8.22	-0.78	0.00	0.00	0.00	0.00	0.00	0.00	
16:00	-0.06	212.64	0.00	670.34	-18.75	18.50	-2.65	1.11	0.41	27.76	14.80	21.73	10.47	10.47	20.85	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
17:00	1.67	228.59	0.00	671.33	18.75	19.17	-2.89	1.80	0.65	9.90	14.37	24.77	12.50	10.18	20.82	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
18:00	28.40	148.38	0.00	682.95	-18.75	3.95	-0.85	1.32	0.73	8.90	14.37	24.77	12.50	10.18	20.82	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
19:00	12.45	198.11	0.00	658.45	-18.75	9.85	-1.86	1.36	0.60	8.83	14.86	28.57	21.75	10.74	20.85	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
20:00	7.32	222.88	0.00	668.62	-18.75	14.77	-2.51	1.75	0.64	9.31	14.86	31.42	18.47	10.87	20.81	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
21:00	2.20	254.80	0.00	678.90	-18.75	20.43	-3.03	2.04	0.66	10.37	14.52	19.12	12.28	10.87	19.43	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
22:00	4.88	258.37	0.00	684.62	-18.75	20.80	-3.06	2.07	0.66	10.48	14.41	20.24	12.12	10.83	20.72	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
23:00	4.27	258.57	0.00	697.35	-18.75	21.08	-3.06	2.10	0.67	10.48	14.38	18.86	11.41	10.83	20.68	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
0:00	7.09	258.44	3.68	694.58	-18.75	21.08	-3.07	2.11	0.67	10.53	14.33	21.45	13.19	10.87	20.68	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
1:00	7.47	267.81	3.69	690.64	-18.75	21.01	-3.03	2.09	0.66	10.57	14.36	21.87	13.38	10.87	20.81	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
2:00	7.51	259.27	3.71	693.49	-18.75	21.30	-3.07	2.10	0.66	10.62	14.34	22.02	13.58	10.87	20.85	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
3:00	6.74	257.48	3.70	690.05	-18.75	21.20	-3.06	2.09	0.65	10.50	14.36	21.65	13.21	10.87	20.79	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
4:00	6.72	254.50	1.93	688.50	-18.75	20.67	-3.02	2.02	0.65	10.28	14.44	22.01	13.26	10.87	20.87	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
5:00	8.18	226.25	0.00	671.07	-18.75	15.43	-2.50	1.76	0.64	9.15	14.74	20.11	12.28	10.87	20.89	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
6:00	8.76	226.81	0.00	668.11	-18.75	16.11	-2.62	1.77	0.64	9.27	14.77	20.76	12.40	10.87	20.85	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

Comments: Cogen was down due to power surge on 12/25/19 from 12:07 PM to 3:08 PM, a total of 3:02 hours. Inlet NOx was not back online after starting up. VCAPCD was notified on 12/25/19 at 5:30 PM.





08:00 2019-12-25 16:00 2019-12-26 00:00

ION/Name	Description	Attribute	Treatment	Ruler Time	Ruler Value	Current Value	Unit	Filter	Time Offset	Form
931AIG111A:NOX	B&W SCR INLET NOX	MV	Mom	08:12 2019-12-26	20.81	26.33	PPM			
931AIG111C:CO	B&W BLR STACK RAW CO	MV	Mom	08:12 2019-12-26	14.76	14.50	%			
931AIG111B:O2	B&W BLR BAW O2	MV	Mean	08:12 2019-12-26	10.97	10.57	PPM			
931AIG111D:NOX	B&W BLR STACK NOX	MV	Mean	08:12 2019-12-26		0				
931-AIC-1111:NCAL	RSM1 CEMS IN CAL	MV	Mom			1				
931-aic-1111:trb	RSM1 CEMS TROUBLE	MV	Mom							

30 minutes 1 hour 8 hours 10 days

Positioning... Trace Control... Analyze... Trace Config... Extended Config...



NEW-INDY CONTAINERBOARD ORKARD MILL

OFFICIAL DAILY COGENERATION LOG

DATE: 12/25/19

STEAM & WATER READINGS				GAS & ELECTRIC READINGS			
CONCENTRATE H 01		HP		TURBINE		MAXON	
PERMEATE H10	LP	HP	SCG LP	TURBINE	MAXON	DUCT BURNER	MEGAWATTS
1633691	126402	1116	0543760	552650	3029240	107374	25771
1622211	219935	1846	0536777	524207	3029240	107374	25771
NEW DEMIN TRAILER							
AMMONIA DELIVERY	TANK 1	TANK 2	%	CHILLER HOURS:	BOILER TEST RESULTS	BOILER TEST RESULTS	NIGHT SHIFT
	YES NO	YES NO	%	PAUSE/SETTER ON/OFF	ALARM: RED YELLOW GREEN		
TURBINE				COGEN BOILER			
FW	7:00	9:00	11:00	13:00	15:00	17:00	19:00
Inlet Temp	48	40	49	49	49	49	49
Humidity	53	55	59	57	56	56	54
Vibration (Max)	3.1	3.7	4.2	3.1	3.0	3.3	3.3
Steam Injection	1/SEC	2.1	2.1	2.1	2.1	2.1	2.1
Turbine L.O. Level	%	90	90	90	90	90	90
T54	%	1458	1400	1383	1406	1432	1432
GENERATOR				COGEN BOILER			
Gen. Breathing Drain	7:00	9:00	11:00	13:00	15:00	17:00	19:00
L.O. Supply	150	151	152	150	150	151	151
Gen. Vibration (Max)	IPS	1.9	1.8	1.9	1.9	1.9	1.9
Tie Line	MW	11.3	11.3	11.3	11.3	11.3	11.3
Generator Voltage	KV	13.1	13.1	13.1	13.1	13.1	13.1
COMPRESSORS				COGEN BOILER			
Filter Separator	PSI	217	217	217	217	217	217
Gas Receiver	PSI	410	410	410	410	410	410
COGEN BOILER				COGEN BOILER			
450 Header Temp	F	710	710	710	710	710	710
HP Drum Level	IN	1.1	1.1	1.1	1.1	1.1	1.1
LP Drum Level	IN	1.1	1.1	1.1	1.1	1.1	1.1
HP Drum Pressure	PSI	469	469	469	469	469	469
LP Drum Pressure	PSI	30	30	30	30	30	30
CO	PPM	8.3	8.3	8.3	8.3	8.3	8.3
NOx	PPM	15.7	15.7	15.7	15.7	15.7	15.7
Hot Well Level	%	15.0	15.0	15.0	15.0	15.0	15.0
COMPRESSORS				COGEN BOILER			
1150 SET POINT	PSI	1103	1103	1103	1103	1103	1103
DUCT BURNER	PSI	225	225	225	225	225	225
Frame Oil Pressure (25--50)	PSI	30	30	30	30	30	30
Temp. cooling	F	72	72	72	72	72	72

NAME: MSV

NAME: M.W.

NOTES:  
 TANK 1: 12:00  
 TANK 2: 15:31  
 DALLING 15:37  
 CHILLED WATER BITTERS CATERPILLAR TEST  
 FROM 1629525 CONN. 1629377 WATER. 16291600

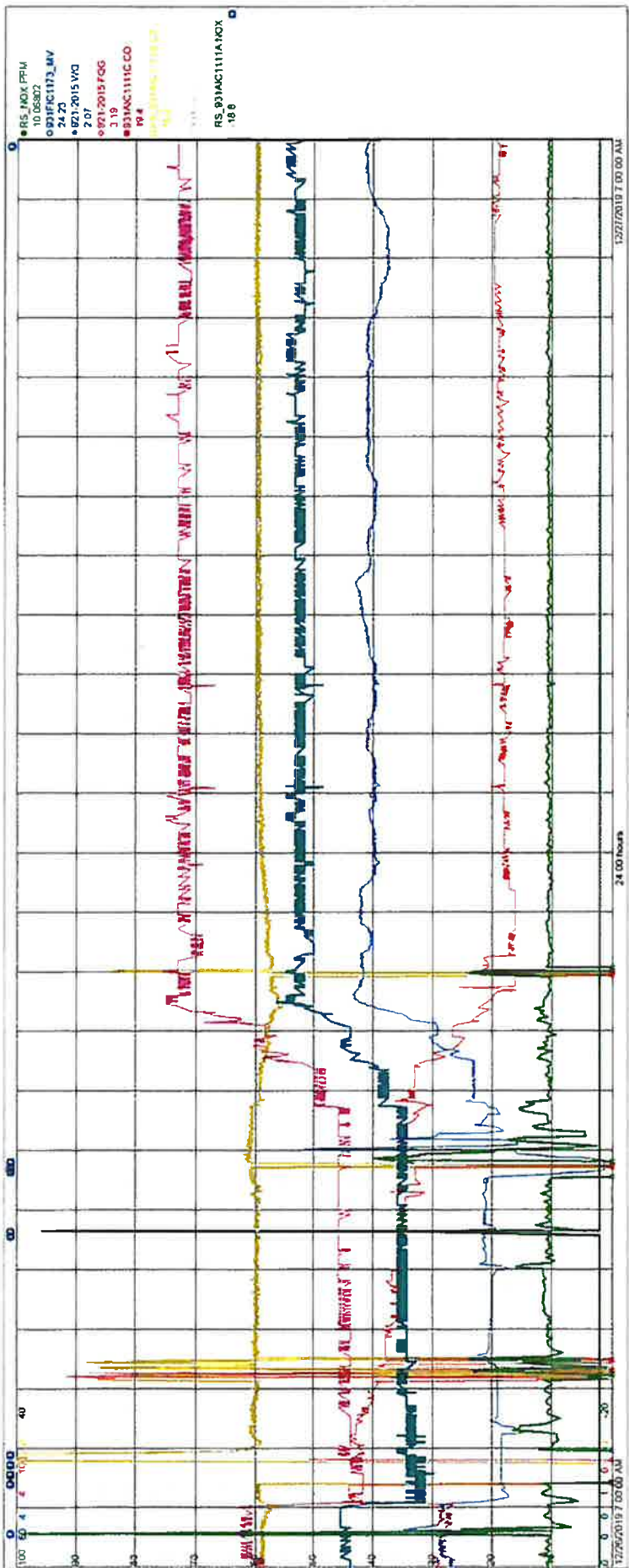
NIGHT SHIFT OPERATOR

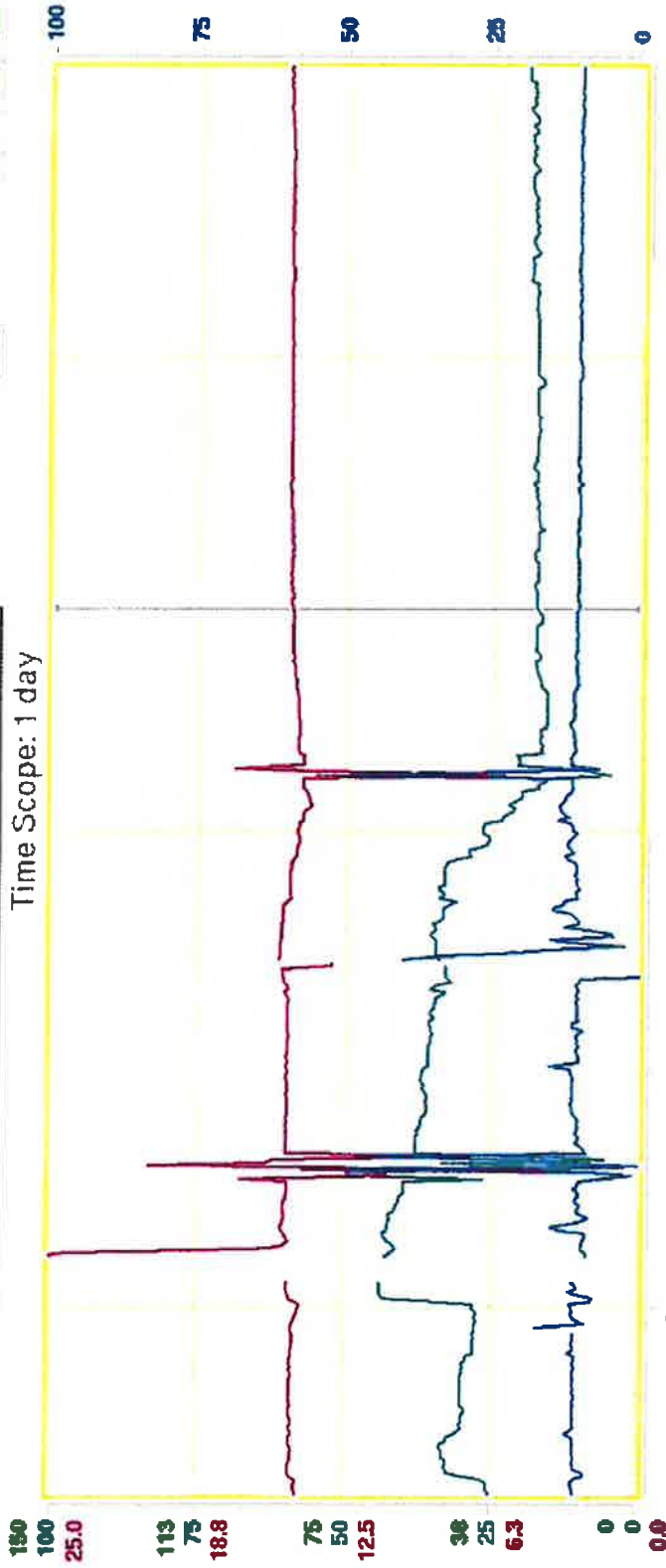
DAY SHIFT OPERATOR

19









150  
 100  
 25.0  
 113  
 75  
 18.8  
 76  
 50  
 12.5  
 36  
 25  
 6.3  
 0  
 0  
 0.0

08:00 2019-12-26 16:00 2019-12-27 00:00

ON/Name	Description	Attribute	Treatment	Ruler Time	Ruler Value	Current Value	Unit	Filter	Time Offset	Form
931AIG111A:NOX	B&W SCR INLET NOX	UV	Mem	19:44 2019-12-26	---	---	PPM			
931AIG111C:CO	B&W BER STACK RAW CO	UV	Mem	19:44 2019-12-26	18.06	21.28	PPM			
931AIG111B:O2	B&W BLR RAW O2%	UV	Mean	19:44 2019-12-26	14.80	14.27	%			
931AIG111D:NOX	B&W BLR STACK NOX	UV	Mean	19:44 2019-12-26	10.80	11.88	PPM			
931-AIG-1111.INCAL	RSMT GEMS IN CAL	UV	Mem	---	---	0				
931-aic-1111.trb	RSMT GEMS TROUBLE	UV	Mem	---	---	1				

01 30 minutes

02 1 hour

03 8 hours

04 10 days

05 Trace Control...

06 Analyze...

07 Trace Config...

08 Extended Config...

09



NAME:		DAY SHIFT OPERATOR		NIGHT SHIFT OPERATOR		NAME:	
COMPRESSORS		AUTO / ON / OFF Filter Separator PSI Gas Receiver PSI		AUTO / ON / OFF Filter Separator PSI Gas Receiver PSI		AUTO / ON / OFF Filter Separator PSI Gas Receiver PSI	
COGEN BOILER		450 Header Temp °F HP Drum Level IN LP Drum Level IN HP Drum Pressure PSI LP Drum Pressure PSI CD PPM NOx PPM Hot Well Level %		450 Header Temp °F HP Drum Level IN LP Drum Level IN HP Drum Pressure PSI LP Drum Pressure PSI CD PPM NOx PPM Hot Well Level %		450 Header Temp °F HP Drum Level IN LP Drum Level IN HP Drum Pressure PSI LP Drum Pressure PSI CD PPM NOx PPM Hot Well Level %	
GENERATOR		Gen. Bearing Drain °F L.O. Supply °F Gen. Vibration (Max) IPS Tie Line kW Generator Voltage kV		Gen. Bearing Drain °F L.O. Supply °F Gen. Vibration (Max) IPS Tie Line kW Generator Voltage kV		Gen. Bearing Drain °F L.O. Supply °F Gen. Vibration (Max) IPS Tie Line kW Generator Voltage kV	
TURBINE		FKW Inlet Temp °F Humidity % Vibration (Max) MILS Steam Injection 1/SEC Turbine L.O. Level % T54		FKW Inlet Temp °F Humidity % Vibration (Max) MILS Steam Injection 1/SEC Turbine L.O. Level % T54		FKW Inlet Temp °F Humidity % Vibration (Max) MILS Steam Injection 1/SEC Turbine L.O. Level % T54	
STEAM & WATER READINGS		PERMEATE H <sub>2</sub> O CONCENTRATE H <sub>2</sub> O NEW DEMO TRAILER YES NO AMMONIA DELIVERY YES NO		PERMEATE H <sub>2</sub> O CONCENTRATE H <sub>2</sub> O NEW DEMO TRAILER YES NO AMMONIA DELIVERY YES NO		PERMEATE H <sub>2</sub> O CONCENTRATE H <sub>2</sub> O NEW DEMO TRAILER YES NO AMMONIA DELIVERY YES NO	
GAS & ELECTRIC READINGS		MASON DUCT BURNER BOILER TEST RESULTS		MASON DUCT BURNER BOILER TEST RESULTS		MASON DUCT BURNER BOILER TEST RESULTS	

0249 00-3011 - 8244

NAME: BENAVIDES

26 DEC 19

NOTES: 0700 2# FIBER DOWN 4# PAPER CONT.  
 0800 1# DOWN - OUT OF STOCK  
 1000 1# COMPRESSOR BACK ON-LINE  
 1030 1# DUCT BURNER OFF  
 1030 REGEN SOFTENERS OFF  
 1530 2# FIBER STARTING DR. FIBER START ON

CONDENSATE

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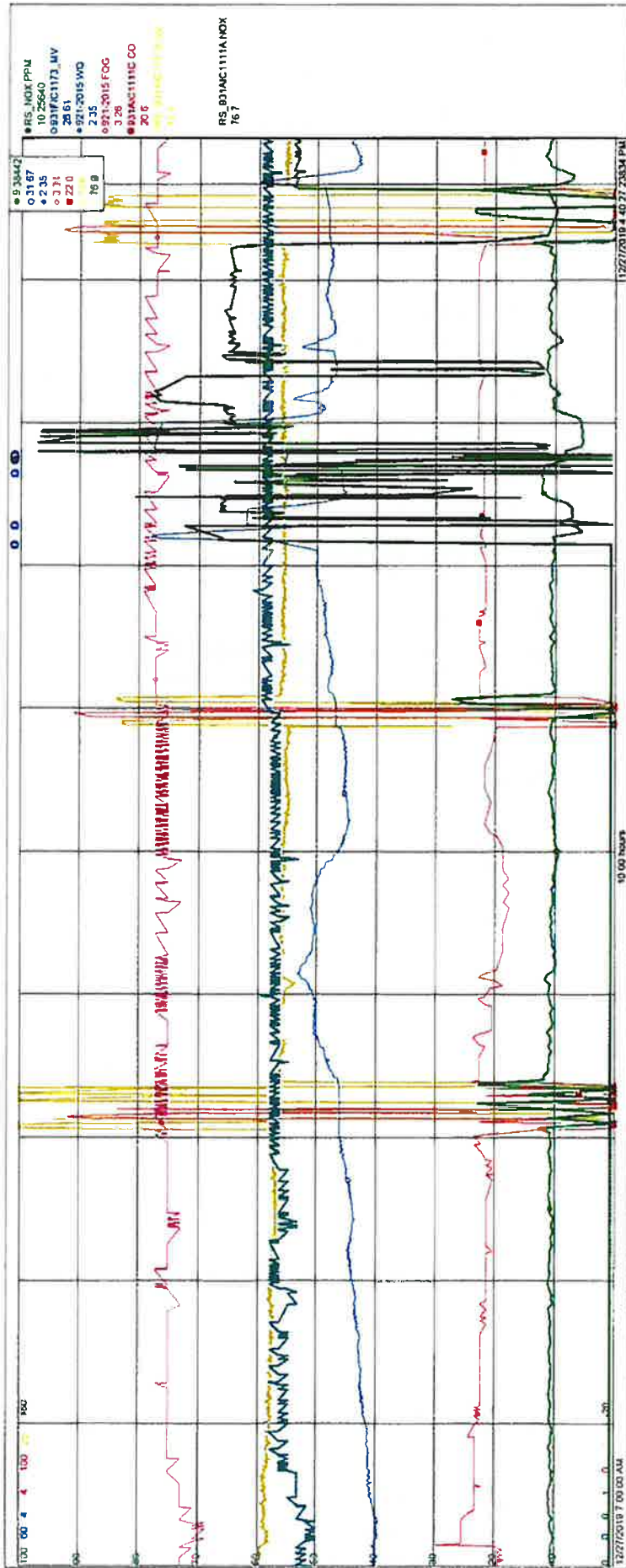
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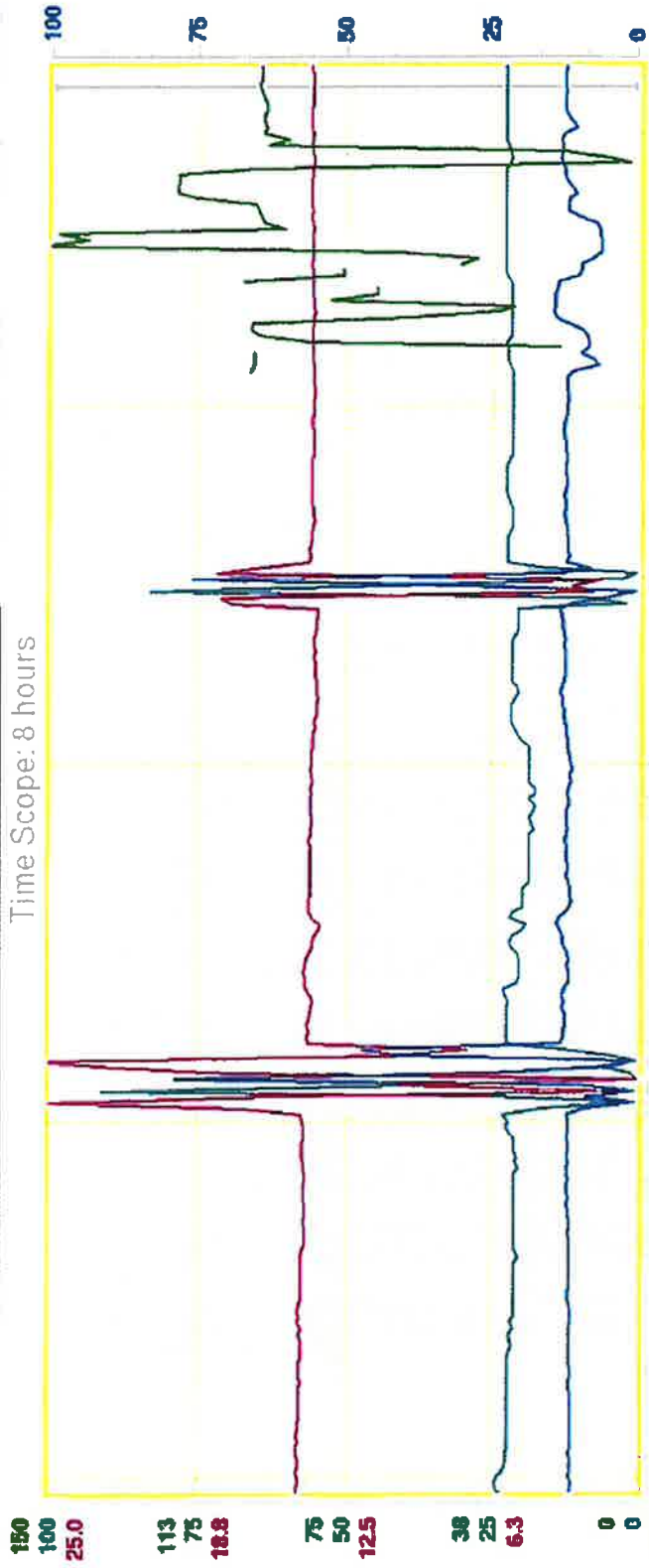
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08:00 10:00 12:00 14:00  
 2019-12-27

ON Name	Description	Attribute	Treatment	Ruler Time	Ruler Value	Current Value	Unit	Filter	Time Offset	Form
931AIC1111A:NOX	B&W SCR INLET:NOX	MV	Mem	15:48	97.38	74.58	PPM			
931AIC1111C:CO	B&W BLR STACK RAW CO	MV	Mem	15:48	22.04	23.16	PPM			
931AIC1111B:O2	B&W BLR RAW O2%	MV	Mean	15:48	13.94	11.98	%			
931AIC1111D:NOX	B&W BLR STACK NOX	MV	Mean	15:48	12.77	15.81	PPM			
931-AIC-1111:INCAL	RSMT CEMS IN CAL	MV	Mem	15:48	0	0				
931-alc-1111:trb	RSMT CEMS TROUBLE	MV	Mem	15:48	1	1				

30 minutes 1 hour 1 day 10 days  
 Positioning... Trace Control... Analyze... Trace Config... Extended Config...



NAME: **BENKVIDS**

DAY SHIFT OPERATOR

NIGHT SHIFT OPERATOR

PERMITS H10	STEAM & WATER READINGS		GAS & ELECTRIC READINGS		TURBINE	SCG LP	HP	LP	HP RECOURSE	LP RECOURSE	TURBINE	DUCT BURNER	MEGAWATTS
	CONCENTRATE H O1	TANK 1	TANK 2	ON / OFF									
CURRENT	1660773	9703795	220991	20874	0571750	6226800	3088596	370914	3088596	370914	26883		
PROXIS	1647939	9698438	200421	1527	0546830	6850330	3020212	59190	3020212	59190	26278		
NEW DEMIN TRAILER	YES	NO	NO	NO	CHILLER HOURS:	104, 58A:45							
AMMONIA DELIVERY	YES	NO	NO	NO	PACKSETER ON / OFF	ALARM: RED	YELLOW	GREEN					
TURBINE													
FMV	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00	
Inlet Temp	19.06	18.94	19.38	19.12	18.88	16.50	5.9	5.8	4.9	4.9	5.2	4.9	
Humidity	23	27	16	14	16	64	100	100	90	80	82	82	
Vibration (Max)	29.7	24.7	11.7	16.7	14.8	22.9	2.4	2.3	2.5	2.6	2.5	2.4	
Steam Injection	15.1	17.0	15.9	15.6	15.0	16.3	5.5	6.9	7.0	7.1	7.5	7.4	
Turbine L.O. Level	15.12	15.21	15.31	15.31	15.38	15.38	15.3	15.3	15.3	15.3	15.3	15.3	
15A	85	85	85	85	100	100	100	100	100	100	100	100	
BATTERIES	14.67	14.80	15.16	15.16	15.21	15.12	14.98	14.94	14.94	14.92	14.97	14.60	
GENERATOR													
Gen. Bearing Drain	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00	
L.O. Supply	150	151	158	159	156	155	153	154	153	152	150	150	
Gen. Vibration (Max)	11.9	11.9	12.1	12.2	12.3	12.3	12.4	12.4	12.4	12.1	12.0	12.0	
Tie Line	10.94	11.39	11.58	11.92	11.94	11.52	11.5	11.5	11.5	11.5	11.5	11.5	
Generator Voltage	12.98	12.98	12.97	12.97	13.00	12.99	13.1	13.1	13.1	13.1	13.1	13.1	
COGEN BOILER													
450 Header Temp	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00	
HP Drum Level	7.0	7.0	7.1	7.0	7.0	7.0	7.0	7.0	7.0	7.0	7.0	7.0	
LP Drum Level	0.1	0.3	0.1	0.2	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	
HP Drum Pressure	468	468	468	475	475	475	475	475	475	475	475	475	
LP Drum Pressure	152	152	140	154	154	154	154	154	154	154	154	154	
CO	22.0	19.5	18.0	19.5	19.6	18.5	18.5	18.5	18.5	18.5	18.5	18.5	
Hot Well Level	14.68	14.44	13.87	13.99	13.93	13.82	13.7	13.7	13.7	13.7	13.7	13.7	
450 Header Temp	8:00	10:00	12:00	14:00	16:00	18:00	20:00	22:00	24:00	2:00	4:00	6:00	
HP Drum Level	11.0	10.4	10.7	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	
LP Drum Level	0.3	0.3	0.3	0.3	0.3	0.3	0.3	0.3	0.3	0.3	0.3	0.3	
HP Drum Pressure	468	468	468	475	475	475	475	475	475	475	475	475	
LP Drum Pressure	152	152	152	154	154	154	154	154	154	154	154	154	
CO	21.5	19.0	17.4	18.2	18.2	18.2	18.2	18.2	18.2	18.2	18.2	18.2	
Hot Well Level	14.68	14.33	13.88	13.91	13.91	13.91	13.91	13.91	13.91	13.91	13.91	13.91	
COMPRESSORS													
Filter Separator	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00	
Gas Receiver	22.1	21.9	22.1	22.1	22.1	21.7	22.1	22.1	22.1	22.1	22.1	22.1	
Frame Oil Pressure (23-50) PSI	405	405	405	406	406	405	404	408	468	405	405	405	
Temp. cooling °F	72	72	72	72	72	72	72	72	72	72	72	72	

BOILER TEST RESULTS

BOILER FEEDWATER

CONDENSATE

CONDUCTIVITY

PHOSPHATE

SILICA

IRON

PH

SOFTENER

STEAM TEST

HP BLOW DOWN

SALE

NOTES:

DAY SHIFT: 1009

NORTH TANK

SOUTH TANK




FEET

FEET



# New-Indy Oxnard Environmental Incident Report

Shaded section to be completed by the EMR

Name of Incident Invalid Inlet NOx Data		Incident Date 12/25/19													
Exact Location Incident Cogen															
Reported By: Victor Kumpere	Estimated Start and Stop Times of Incident: 12/25 3:08 PM, 12/27 4:40 PM	Possible Cause: SCE Power Outage													
<b>Incident Type:</b> <input type="checkbox"/> Spill Internal <input type="checkbox"/> Improper Waste Disposal <input type="checkbox"/> Spill External <input type="checkbox"/> Near miss or below spill release guidelines <input checked="" type="checkbox"/> Air Emission <input type="checkbox"/> Other _____		<b>Released To</b> <input type="checkbox"/> Storm Water System <input type="checkbox"/> Secondary Containment <input checked="" type="checkbox"/> Process Sewer <input checked="" type="checkbox"/> Air <input type="checkbox"/> Ground (External) <input type="checkbox"/> Ground (Inside Mill Property) <input type="checkbox"/> Near Miss <input type="checkbox"/> Other _____													
<b>Detailed Description of Event</b> <p>SCE power loss to Mill surged power damaging Inlet NOx CLD Analyzer. We replaced the CLD on 12/26, the spare CLD did not work properly. Contacted Manufacturer of CEMS and Technicians were not available to come onsite. After extensive unsuccessful troubleshooting via phone, support decision was made to bring in an independent contractor. Contractor arrived 12/27 1:28 PM, inlet NOx unit was repaired and back online at 4:40 pm.</p> <p><i>(if required use additional paper and attach)</i></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Estimated Amount Released</th> <th>pH</th> <th>CONSISTENCY (%)</th> <th>Estimated Monetary Loss</th> <th>No. of Emergency Sandbags used</th> <th>After event, Sandbags Removed/Disposed</th> </tr> </thead> <tbody> <tr> <td> <input type="checkbox"/> _____ Gallons    <input type="checkbox"/> _____ Pounds  <input type="checkbox"/> Other _____           </td> <td></td> <td></td> <td></td> <td> <input type="checkbox"/> _____ Bags  <input type="checkbox"/> N/A           </td> <td> <input type="checkbox"/> Yes    <input type="checkbox"/> No           </td> </tr> </tbody> </table>				Estimated Amount Released	pH	CONSISTENCY (%)	Estimated Monetary Loss	No. of Emergency Sandbags used	After event, Sandbags Removed/Disposed	<input type="checkbox"/> _____ Gallons <input type="checkbox"/> _____ Pounds <input type="checkbox"/> Other _____				<input type="checkbox"/> _____ Bags <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No
Estimated Amount Released	pH	CONSISTENCY (%)	Estimated Monetary Loss	No. of Emergency Sandbags used	After event, Sandbags Removed/Disposed										
<input type="checkbox"/> _____ Gallons <input type="checkbox"/> _____ Pounds <input type="checkbox"/> Other _____				<input type="checkbox"/> _____ Bags <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No										
List Any External Emergency Clean Up Personnel Contacted N/A		List Any External Agencies Contacted (Agency, person and time of call.) VCAPCD on 12/25/19 at 5:30 PM													
List Hueneme Personnel Contacted (Foreman, Mill Manager, etc.) Victor Kumpere		Any Acute or Chronic Health Risks (refer to MSDS) N/A													
<b>Describe Any Emergency Response Actions</b> Troubleshooting began as soon as failure was observed and APCD was contacted.															
<b>Suggestions to Prevent Reoccurrence</b> 1. Purchase or repair spare CLD.			<b>Estimated Completion Date</b> 1. 1/15/20												
2.			2.												
3.			3.												
4.			4.												
<b>Root Cause after investigation</b> SCE power loss causing power surge.		<b>Severity Level (level 1 and 2 must be tracked through SHIMS)</b> <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4													
Investigated By: Gary Uribe		Investigated Date 12/25-27/19													
<b>Follow Up</b>		<b>By When</b>	<b>Completion Date</b>												
<b>Issued by</b>  Department Manager 12/31/19	<b>Reviewed by</b>  Technical Superintendent 12/31/2019	<b>Approved by</b>  Mill Manager 12/31/19 For Rudy while on vacation													

Print Time: 12/31/2019 11:18:47 AM

Note: This document is valid for only ONE week after print time!

# NEW INDY

CONTAINERBOARD

December 31, 2019

Ventura County Air Pollution Control District  
669 County Square Drive, Second Floor  
Ventura, CA 93003

Attention: Ed Swede

Subject: Continuous Emission Monitoring System (CEMS) - Invalid O<sub>2</sub> data

Dear Mr. Swede:

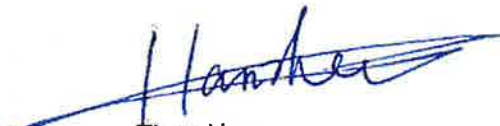
New-Indy Oxnard is submitting this follow-up report for the call made by Zhen Han to the VCAPCD Breakdown Center Hotline on December 27, 2019 at 8:35 PM.

On December 27 at 4:40 PM, CEMS invalid O<sub>2</sub> data was observed right after the inlet NO<sub>x</sub> issue was resolved (refer to December 25-27, 2019 breakdown report for invalid inlet NO<sub>x</sub> data for details). The O<sub>2</sub> span did not pass after a manual calibration was completed at 4:40 PM. The unit was re-calibrated and ammonia scrubber was replaced but oxygen remained at around 7.5%. To ensure mill's compliance, the ammonia valve was operated in manual throughout the night to control raw NO<sub>x</sub> at approximately 9 ppm.

On December 28 at 8:15 AM, the O<sub>2</sub> module was replaced but calibration still failed. It was discovered that the calibration program was corrupted. The program was corrected, and CEMS started recording O<sub>2</sub> data at 9:25 AM. A passing auto calibration was completed at 10:25 AM. The CEMS had invalid O<sub>2</sub> data from December 27, 4:40 PM to December 28, 10:25 AM; a total of 17.75 hours. There were no excess emissions during this period.

The Daily Emission Sheets, PI trends, ABB trends, Cogen Reports and Environmental Incident Report have been provided for your review. If you have any questions or require any additional information, please call me at (805) 271-7284.

Sincerely,



Zhen Han  
Process Engineer

---

**NEW INDY OXNARD, LLC**

5936 PERKINS ROAD • OXNARD, CALIFORNIA 93033 • WWW.NEWINDYCONTAINERBOARD.COM  
PHONE (805) 986-3881 • FAX (805) 488-5186



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:

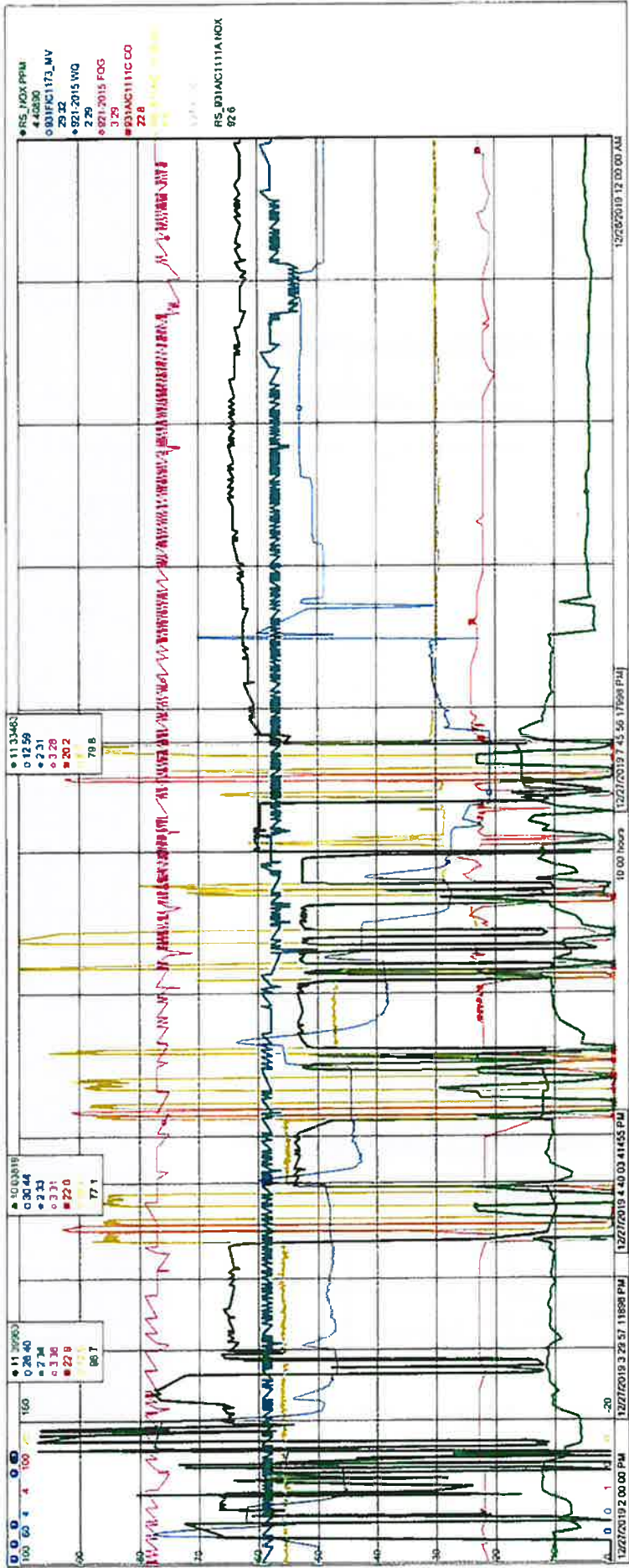
Air Quality Engineer  
Ventura County Air Pollution Control District  
669 County Square Drive  
Ventura, CA 93003

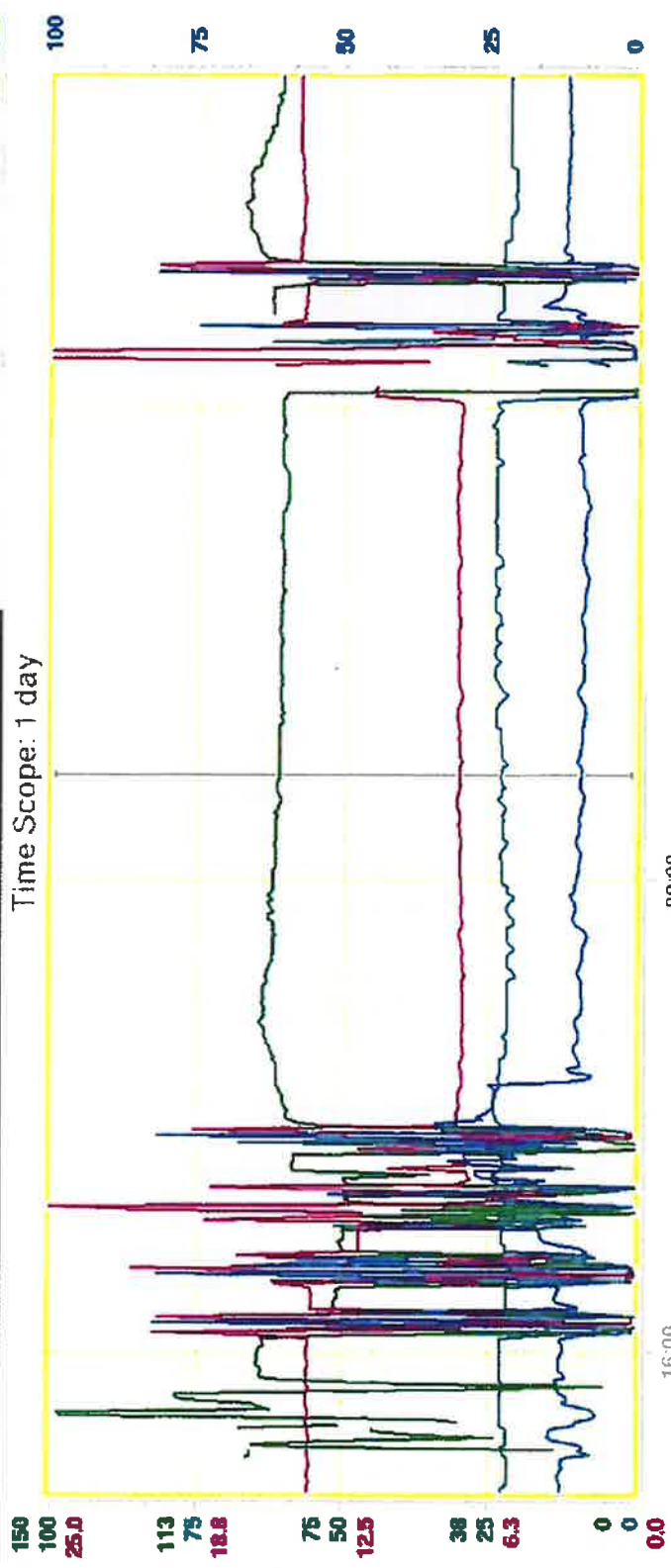
### Certification by Responsible Official

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

<p>Signature and Title of Responsible Official:</p> <p>Signature: <u></u></p> <p>Title: <u>Technical Manager</u></p>	<p>Date: <u>12/31/2019</u></p>
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------







ON/Name	Description	Attribute	Treatment	Ruler Time	Ruler Value	Current Value	Unit	Filter	Time Offset	Form
931AIG1111A:NOX	B&W SCR INLET:NOX	MV	Mem	01-48 2019-12-28	81.55	85.36	PPM			
931AIG1111C:CO	B&W BLR STACK RAW CO	MV	Mem	01-46 2019-12-28	22.04	23.89	PPM			
931AIC1111B:O2	B&W BLR RAW O2%	MV	Mean	01-46 2019-12-28	7.54	13.94	%			
931AIC1111D:NOX	B&W BLR STACK NOX	MV	Mean	01-46 2019-12-28	9.13	12.17	PPM			
931-AIC-1111:NCAL	RSMF CEMS IN CAL	MV	Mem			0				
931-alc-1111:trb	RSMF CEMS TROUBLE	MV	Mem			1				

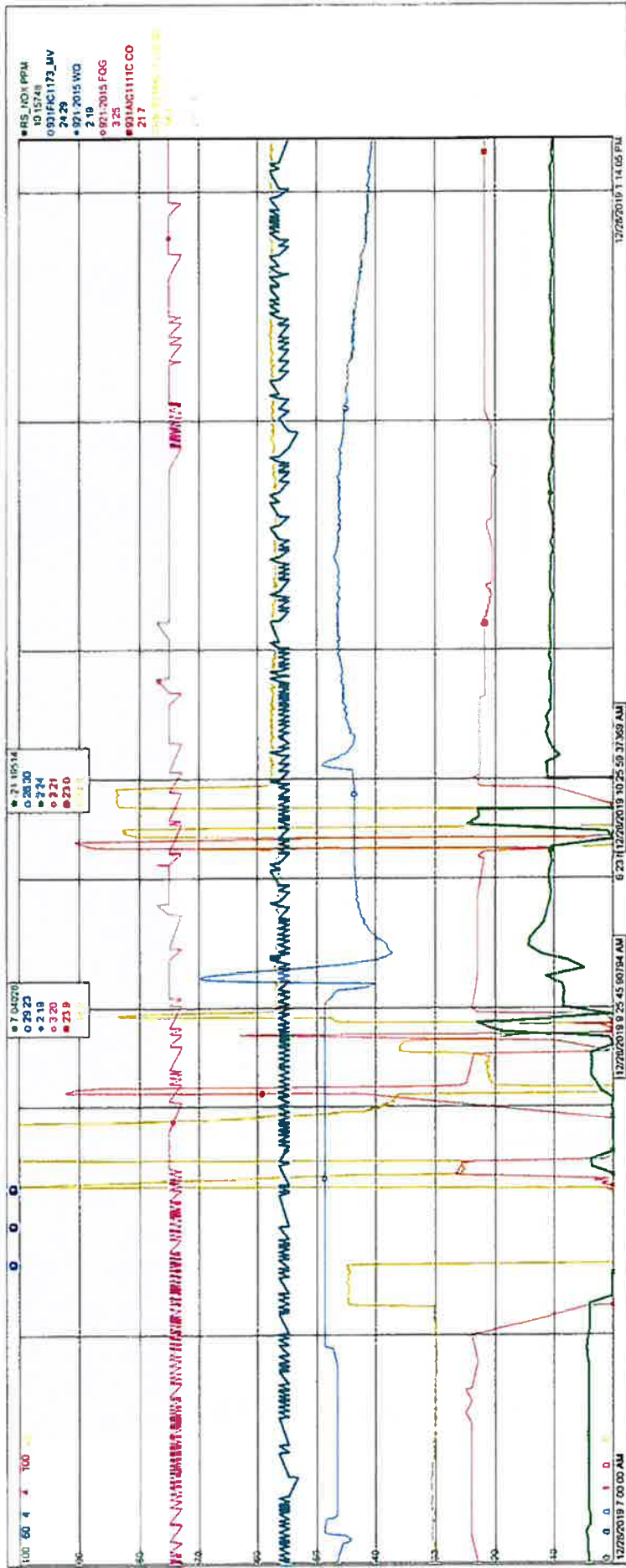
01 30 minutes 02 1 hour 03 8 hours 04 10 days  
05 Positioning... 06 Trace Control... 07 Analyze... 08 Trace Config... 09 Extended Config...

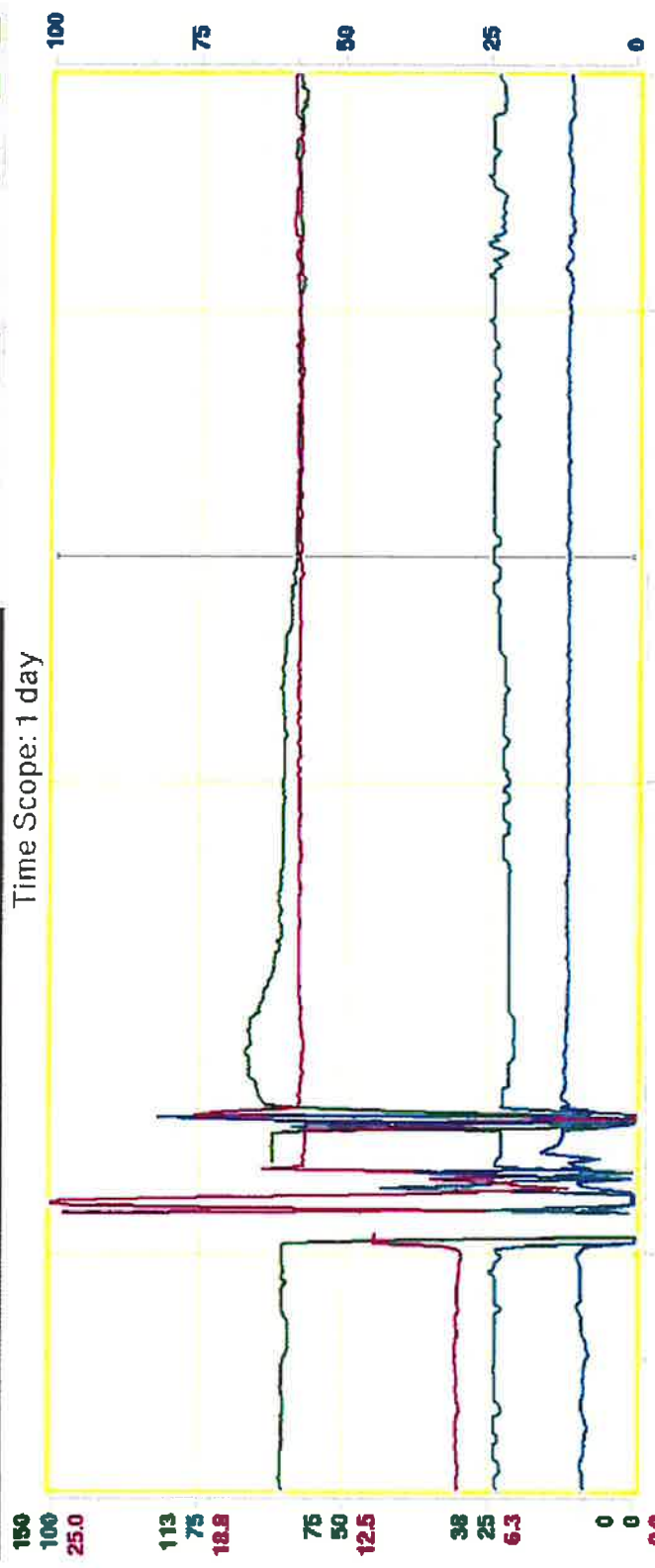












ON/Name	Description	Attribute	Treatment	Ruler Time	Ruler Value	Current Value	Unit	Filter	Time Offset	Form
931AIC1111A:NOX	B&W SCR INLET NOX	MV	Mem	19:48 2019-12-28	97.00	96.96	PPM			
931AIC1111C:CO	B&W BLR STACK RAW CO	MV	Mem	19:48 2019-12-28	24.59	23.09	PPM			
931AIC1111B:O2	B&W BLR RAW O2%	MV	Mean	19:48 2019-12-28	14.42	13.92	%			
931AIC1111D:NOX	B&W BLR STACK NOX	MV	Mean	19:48 2019-12-28	11.47	12.34	PPM			
931-AIG-1111:INCAL	RSMT GEMS IN CAL	MV	Mem			0				
931-aic-1111:trb	RSMT GEMS TROUBLE	MV	Mem			1				

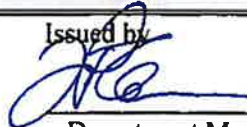


30 minutes 1 hour 8 hours 10 days  
Positioning... Trace Control... Analyze... Trace Config... Extended Config...



PERMATE HHO		CONCENTRATE H O		LP		HP		TURBINE		GAS & ELECTRIC READINGS		BOILER TEST RESULTS																																																																																																		
CURRENT	PREVIOUS	NEW DCMN TRAILER	YES	NO	TANK 1	TANK 2	%	CHILLER HOURS	SCC	LP	HP	MAXON	DUCCI BURNER	MEGAWATS																																																																																																
1673943	1660713	9105778	9105778	220991	1995	2085	3.5	104,584.45	1620	1620	1620	3088596	277759	277759																																																																																																
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<p>AMMONIA DELIVERY YES <input type="checkbox"/> NO <input type="checkbox"/> % FULL: 43/44</p> <p>PACKSETTER (ON/OFF) ALARM: RED <input type="checkbox"/> YELLOW <input type="checkbox"/> GREEN <input type="checkbox"/></p>																																																																																																														
<p><b>TURBINE</b></p> <table border="1"> <tr> <th>7:00</th> <th>8:00</th> <th>9:00</th> <th>11:00</th> <th>13:00</th> <th>15:00</th> <th>17:00</th> <th>19:00</th> <th>21:00</th> <th>23:00</th> <th>3:00</th> <th>5:00</th> </tr> <tr> <td>50.12</td> <td>52.00</td> <td>51.94</td> <td>52.06</td> <td>51.88</td> <td>52.12</td> <td>51.88</td> <td>52.30</td> <td>47.88</td> <td>52.06</td> <td>48.51</td> <td></td> </tr> <tr> <td>2.2</td> <td>5.6</td> <td>6.4</td> <td>6.5</td> <td>6.2</td> <td>6.2</td> <td>6.2</td> <td>5.1</td> <td>9.5</td> <td>5.5</td> <td>5.3</td> <td></td> </tr> <tr> <td>24.7</td> <td>18.5</td> <td>15.5</td> <td>24.7</td> <td>27.7</td> <td>31.7</td> <td>32.5</td> <td>32.7</td> <td>31.7</td> <td>24.8</td> <td>25.9</td> <td></td> </tr> <tr> <td>0.75</td> <td>0.78</td> <td>0.80</td> <td>0.83</td> <td>0.80</td> <td>0.80</td> <td>0.80</td> <td>0.75</td> <td>0.78</td> <td>0.78</td> <td>0.78</td> <td></td> </tr> <tr> <td>3.9</td> <td>2.14</td> <td>2.25</td> <td>2.25</td> <td>2.31</td> <td>2.25</td> <td>2.25</td> <td>2.31</td> <td>2.19</td> <td>2.31</td> <td>2.12</td> <td></td> </tr> <tr> <td>1.00</td> <td>1.00</td> <td>1.00</td> <td>1.00</td> <td>1.00</td> <td>1.00</td> <td>1.00</td> <td>1.00</td> <td>1.00</td> <td>1.00</td> <td>1.00</td> <td></td> </tr> <tr> <td>1468</td> <td>1485</td> <td>1502</td> <td>1494</td> <td>1494</td> <td>1494</td> <td>1490</td> <td>1484</td> <td>1480</td> <td>1476</td> <td>1472</td> <td>1453</td> </tr> </table>															7:00	8:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	3:00	5:00	50.12	52.00	51.94	52.06	51.88	52.12	51.88	52.30	47.88	52.06	48.51		2.2	5.6	6.4	6.5	6.2	6.2	6.2	5.1	9.5	5.5	5.3		24.7	18.5	15.5	24.7	27.7	31.7	32.5	32.7	31.7	24.8	25.9		0.75	0.78	0.80	0.83	0.80	0.80	0.80	0.75	0.78	0.78	0.78		3.9	2.14	2.25	2.25	2.31	2.25	2.25	2.31	2.19	2.31	2.12		1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00		1468	1485	1502	1494	1494	1494	1490	1484	1480	1476	1472	1453
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<p>NOTES: Bad Readings on the Stack-Gary E. Fixed it, now is working normally. Reason @ 08:20.</p> <p>1930 WDRREN ON CPAN MIXER 2.4.165</p> <p>3550 P/M DOWN WRAPPED UP</p> <p>0603 2ND FIBER DOWN</p>																																																																																																														

# New-Indy Oxnard Environmental Incident Report

Shaded section to be completed by the EMR

Name of Incident <b>Invalid O2 Data</b>		Incident Date <b>12/27/19</b>	
Exact Location Incident <b>Cogen</b>			
Reported By: <b>Zhen Han</b>		Estimated Start and Stop Times of Incident: <b>12/27 4:40 PM – 12/28 10:25 AM</b>	Possible Cause: <b>SCE Power Outage</b>
Incident Type: <input type="checkbox"/> Spill Internal <input type="checkbox"/> Improper Waste Disposal <input type="checkbox"/> Spill External <input type="checkbox"/> Near miss or below spill release guidelines <input checked="" type="checkbox"/> Air Emission <input type="checkbox"/> Other _____		Released To <input type="checkbox"/> Storm Water System <input type="checkbox"/> Secondary Containment <input checked="" type="checkbox"/> Process Sewer <input checked="" type="checkbox"/> X Air <input type="checkbox"/> Ground (External) <input type="checkbox"/> Ground (Inside Mill Property) <input type="checkbox"/> Near Miss <input type="checkbox"/> Other _____	
Detailed Description of Event: On 12/27 after configuring and repairing Inlet NOx Analyzer, which was damaged by the power outage, we discovered the O2 module was not reading correctly. After extensive troubleshooting including replacing the Ammonia scrubber decision was made to change the O2 module on 12/28. Ammonia valve was put in manual to control raw NOx to approx. 9 ppm. After correcting O2 module, it was discovered program was corrupted for auto calibration. Program was corrected and tested. The 12/28 10:05 am auto calibration passed and CEMS was put back online.			
<i>(if required use additional paper and attach)</i>			
Estimated Amount Released		pH	CONSISTENCY (%)
<input type="checkbox"/> _____ Gallons <input type="checkbox"/> _____ Pounds <input type="checkbox"/> Other _____			
			Estimated Monetary Loss No. of Emergency Sandbags used <input type="checkbox"/> _____ Bags <input type="checkbox"/> N/A
List Any External Emergency Clean Up Personnel Contacted N/A		List Any External Agencies Contacted (Agency, person and time of call.) VCAPCD on 12/27/19 at 8:35 PM	
List Hueneme Personnel Contacted (Foreman, Mill Manager, etc.) Victor Kumpera		Any Acute or Chronic Health Risks (refer to MSDS) N/A	
Describe Any Emergency Response Actions Troubleshooting began as soon as failure was observed and APCD was contacted.			
Suggestions to Prevent Reoccurrence 1. Purchase or repair spare O2 module			Estimated Completion Date 1. 1/15/20
2.			2.
3.			3.
4.			4.
Root Cause after investigation: SCE power loss causing power surge.		Severity Level (level 1 and 2 must be tracked through SHIMS) <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4	
Investigated By: <b>Gary Uribe</b>		Investigated Date <b>12/27-28/19</b>	
<b>Follow Up</b>		<b>By When</b>	<b>Completion Date</b>
Issued by  Department Manager		Reviewed by  Technical Superintendent 12/21/2019	Approved by  Mill Manager 12/31/19 For Rudy while on vacation

Print Time: 12/31/2019 11:33:38 AM

Note: This document is valid for only ONE week after print time!



**LM2500 – PK GENERAL ELECTRIC  
GAS TURBINE  
ANNUAL COMPLIANCE and RATA EMISSIONS TESTING  
VCAPCD PTO #0157  
March 3, 2020**

**Prepared For:  
NEW INDY OXNARD  
5936 Perkins Road,  
Oxnard, CA 93033**

**Attn: Robyn Lebrilla**

**Facility Location:  
NEW INDY OXNARD  
5936 Perkins Road,  
Oxnard, CA 93033**

**For Submission to:  
Ventura County Air Pollution Control District  
669 County Square Drive  
Ventura, California 93003**

**Attn: Ed Swede**

**Prepared by:  
AIRx Testing Services, Inc.  
2472 Eastman Avenue #34  
Ventura, CA 93003**

**Job No.: 23022**

**Lab No.: 220-017**

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Test Team Leader**

**Reviewed by:  
Tom Porter**

**Submitted  
March 31, 2020**

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**SUMMARY OF SOURCE TEST RESULTS**

**New Indy  
Gas Turbine  
Rosemount CEM  
3/3/2020**

<b>CONSTITUENTS</b>	<b>Run 1</b>	<b>Run 2</b>	<b>Run 3</b>	<b><i>Average</i></b>	<b><i>Allowable</i></b>
<b>NOx, ppmv:</b>	<b>11.4</b>	<b>11.3</b>	<b>11.2</b>	<b><i>11.3</i></b>	<b>-</b>
<b>NOx ppmv @ 15 % O2:</b>	<b>10.5</b>	<b>10.4</b>	<b>10.3</b>	<b><i>10.4</i></b>	<b>12</b>
<b>NOx, lb/hr:</b>	<b>11.69</b>	<b>11.63</b>	<b>11.61</b>	<b><i>11.64</i></b>	<b>-</b>
<b>NOx, lb/MMBtu</b>	<b>0.0013</b>	<b>0.0013</b>	<b>0.0013</b>	<b><i>0.0013</i></b>	<b>-</b>
<b>CO, ppmv:</b>	<b>21.2</b>	<b>23.0</b>	<b>23.3</b>	<b><i>22.5</i></b>	<b>-</b>
<b>CO, ppmv @ 15% O2:</b>	<b>19.4</b>	<b>21.2</b>	<b>21.4</b>	<b><i>20.7</i></b>	<b>-</b>
<b>CO, lb/hr:</b>	<b>13.17</b>	<b>14.40</b>	<b>14.70</b>	<b><i>14.09</i></b>	<b>59.65</b>
<b>CO, lb/MMBtu</b>	<b>0.0015</b>	<b>0.0017</b>	<b>0.0017</b>	<b><i>0.0016</i></b>	<b>-</b>
<b>O2, %:</b>	<b>14.5</b>	<b>14.5</b>	<b>14.5</b>	<b><i>14.5</i></b>	<b>-</b>
<b>NH3, ppmv:</b>	<b>1.5</b>	<b>1.7</b>	<b>1.5</b>	<b><i>1.6</i></b>	<b>-</b>
<b>NH3, ppmv @ 15% O2:</b>	<b>1.4</b>	<b>1.6</b>	<b>1.3</b>	<b><i>1.4</i></b>	<b>20</b>
<b>Stack Flow:</b>	<b>142855</b>	<b>143642</b>	<b>144504</b>	<b><i>143667</i></b>	<b>-</b>
<b>Ammonia Injection Rate, lb/hr (avg):</b>	<b>26.42</b>	<b>23.11</b>	<b>23.40</b>	<b><i>24.31</i></b>	<b>-</b>
<b>Fuel Usage (Turbine &amp; Duct), dscfm:</b>	<b>4804.9</b>	<b>4810.1</b>	<b>4862.7</b>	<b><i>4825.9</i></b>	<b>-</b>
<b>Turbine Load, MWh (avg):</b>	<b>24.87</b>	<b>25.06</b>	<b>25.30</b>	<b><i>25.08</i></b>	<b>-</b>

New Indy  
Turbine  
3/3/2020

CEMS RATA  
Calculations

Run	AIRx Testing - Reference Method		
	NOx ppmv @ 15% O2	O2 Dry %	CO ppmv @ 15% O2
1	10.7	14.5	19.2
2	10.4	14.5	19.0
3	10.4	14.5	20.3
4	10.2	14.5	20.5
5	10.4	14.5	21.4
6	10.6	14.5	21.5
7	10.6	14.5	21.6
8	10.4	14.6	21.6
9	10.1	14.4	21.0

Run	New Indy		CEMS
	NOx ppmv @ 15%	O2 Dry %	CO ppmv @ 15%
1	10.8	14.0	19.3
2	10.5	14.1	19.4
3	10.5	14.1	20.6
4	10.2	14.0	20.5
5	10.5	14.1	21.3
6	10.6	14.1	21.3
7	10.6	14.1	21.5
8	10.5	14.0	21.2
9	10.4	14.0	20.8

Run	Reference Method - CEM, Difference		
	NOx ppmv @ 15%	O2 Dry %	CO ppmv @ 15%
1	-0.1	0.4	-0.1
2	0.0	0.4	-0.4
3	0.0	0.4	-0.2
4	0.0	0.4	0.0
5	-0.1	0.4	0.1
6	0.0	0.4	0.3
7	0.0	0.5	0.1
8	-0.1	0.5	0.4
9	-0.3	0.4	0.3

Arithmetic Mean, d  
Standard Deviation, Sd  
Confidence Coefficient, CC  
Avg Reference Method, RM  
Relative Accuracy, RA

-0.1	0.4	0.1
0.1	0.0	0.3
0.1	0.0	0.2
10.4	14.5	20.7
<b>1.3</b>	<b>3.3</b>	<b>1.2</b>

NOTE: Calculations based on "Code of Federal Regulations 40", 1988, Part 60, Appendix B, Specification 2, p. 939.



New Indy  
Turbine  
3/3/2020

**CEM Bias Adjustment Factor (BAF) Calculations Summary**

Raw NOx, ppmv	
Average Difference, RM-CEM; d	-0.1
Std Deviation; Sdev	0.1
T' Value	2.306
Number of Runs; n	9
Conf. Coefficient; CC	0.07
CC - d  ; If > zero, No BAF Required	0.008
Mean CEM Results, CEM	10.5
Raw NOx ppm, BAF	1.006

Stack Flow, DSCFM	
Average Difference, RM-CEM; d	0
Std Deviation; Sdev	0
T' Value	2.306
Number of Runs; n	9
Conf. Coefficient; CC	0
CC - d  ; If > zero, No BAF Required	0
Mean CEM Results, CEM	21
Flow DSCFM, BAF	Not req'd; CEMS high

- NOTES: 1. Calculation of BAF based on SCAQMD protocol for Rule 2012, Volume 3, SCAQMD Rules and Regulations XVIII - XXX, Sept 9, 1994; Att.B
2. If |NOx ppm diff.| < 1 ppm, then the NOx ppm BAF is not reqd.
3. If (RM - CEM avg diff.) < zero, the CEM is biased high; no BAF is reqd.
4.  $BAF = 1 + (|d|/CEM)$  where 'd' refers to the average RM-CEM difference, and CEM refers to the average CEM results.



# INTRODUCTION



## 1.0 INTRODUCTION

On March 3, 2020 AIRx Testing Services, Inc. conducted the annual compliance/RATA source test on a natural gas fired General Electric LM2500-PK Gas Turbine. The unit is located at the New Indy Plant on Perkins Road, in Oxnard. The turbine is used for the generation of electrical power and process heat for the facility operations. The tests were required to satisfy requirements detailed in PTO #0157.

The objective of the testing was to determine NO<sub>x</sub>, CO and NH<sub>3</sub> emissions from the unit at one (1) operating load of approximately 100% capacity. Additionally, data taken from the compliance tests was used to determine the relative accuracy (RATA) of the facility CEM (Rosemont) equipment. Operational data reported by New Indy personnel was turbine and duct burner fuel usage (mscfh), Ammonia injection rate (lb/hr) and turbine load (KWh).

**PROCESS DETAILS:** The LM2500-PK is rated for 290 MMBtu/hr heat input and exhausts into an HRSG with a COEN duct burner. The duct burner is rated at 50.8 MMBtu/hr. Emissions are controlled with a Babcock-Hitachi Selective Catalytic Converter (SCR). The SCR uses ammonia injection for NO<sub>x</sub> reduction. The duct dimensions at the sample location are 54" x 125". An integrated sampling probe has been installed by the facility. All sampling was performed from the integrated sampling probe. The sample port locations are located zero diameters upstream and one (1) equivalent diameter downstream from a disturbance; consequently velocity traverses could not be accurately performed.

**CEM DATA:** CEM data was recorded by a Data Acquisition System (DAS) during the test program in the form of one (1) minute averages. The one (1) minute data averages were then printed out and averaged to obtain CEM data for comparison to the RM data. The CEM data was obtained by plant personnel during the test program and was provided to the test team. The CEM data monitored NO<sub>x</sub> in ppmv and CO ppmv concentrations corrected to 15% oxygen and oxygen concentrations. NO<sub>x</sub>, CO and O<sub>2</sub> response times were conducted prior to the start of the testing.

**CONTINUOUS MONITORS:** NO<sub>x</sub>, CO, and O<sub>2</sub> sampling utilized a stainless steel multi-point sampling probe connected with a Teflon sampling line to a sample conditioner. The dry gases were then transported through a Teflon line to the sample gas flow panel for distribution to the individual analyzers. Triplicate 96 minute sampling for NO<sub>x</sub>, CO and O<sub>2</sub> was performed in accordance with CARB Method 100 and EPA Method 20. NO<sub>x</sub> measurements were made utilizing an API 200EH chemiluminescent analyzer. CO concentrations were determined with an API 300EM NDIR w/GFC analyzer. Oxygen concentration was measured utilizing a Servomex Model 1400 paramagnetic analyzer. Initial three (3) point calibrations were performed at the analyzers. Subsequent calibrations were performed through the sample system probe tip (Bias checks). All initial bias checks correlated with the initial instrument calibrations to within 2% of analyzer range. Bias calibrations were performed before and after each test run and used to correct the emissions data for any analyzer drift. All monitor calibrations were performed with EPA Protocol 1 calibration gases.

During all tests, the NO<sub>x</sub> and O<sub>2</sub> RM analyzers were operated on the 25 ppmv and 25% scales, respectively. The CO monitor was setup and calibrated for operation on the 100 ppmv scale.

There were no deviations from CARB Method 100 or EPA Method 20 methodology during the test.

## 1.0 INTRODUCTION (cont)

### CONTINUOUS MONITORS cont):

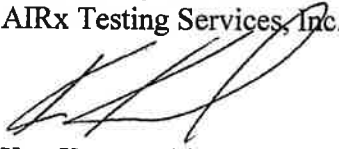
All monitored data was continuously recorded on a 10" analog chart recorder. Chart speed was maintained at 10 cm/hr. Analyzer output was also recorded with a PC based Data Acquisition System (DAS) and imported into spreadsheets for determination of average run concentrations.

**FLOWRATE:** Stack flow calculations were performed using fuel consumption data provided by plant personnel (turbine and duct burner fuel usages added together) and the stack oxygen, in accordance with EPA Method 19.

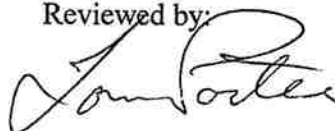
**AMMONIA:** Exhaust duct ammonia samples were collected and analyzed in accordance with BAAQMD Method ST-1B. The sample train consists of four (4) iced impingers, the first two (2) contained approximately 150 ml 0.1N HCl, the third is empty and the fourth contains silica gel. The sample was collected utilizing an EPA Method 5 sampling console, Three (3) 96 minute runs were collected for compliance determination. Samples were collected utilizing stainless a steel sampling probe. Analysis of the collected ammonia samples was performed by the AIRx Testing Services laboratory.

All reporting and calculations have been performed using VCAPCD standard conditions of 68°F and 29.92 inches of Hg. If you have any questions regarding this test program or report, please contact the undersigned at (805) 644-1099.

Respectfully Submitted  
AIRx Testing Services, Inc.

  
Ken Kennepohl  
Senior Engineer

Reviewed by:



Tom Porter  
Vice President of Testing Services

<b>CALCULATIONS</b>





**CONTINUOUS EMISSIONS MONITORING - CARB METHOD 1-100**

Client : New Indy  
 Site : Oxnard  
 Unit : Turbine

Date : 3/3/2020  
 Job# : 23022  
 Lab# : 219-012

**FIELD DATA**

Test Length      96      mins.      Points 1 Minute

Standard Temperature:      68 ° F

**Drift Corrected Emissions Data**

<i>Outlet</i>	<i>Run #1</i>	<i>Run #2</i>	<i>Run #3</i>
NOx	<span style="border: 1px solid black; padding: 2px;">11.43</span> ppm	<span style="border: 1px solid black; padding: 2px;">11.31</span> ppm	<span style="border: 1px solid black; padding: 2px;">11.23</span> ppm
O2	<span style="border: 1px solid black; padding: 2px;">14.47</span> %	<span style="border: 1px solid black; padding: 2px;">14.50</span> %	<span style="border: 1px solid black; padding: 2px;">14.47</span> %
CO	<span style="border: 1px solid black; padding: 2px;">21.16</span> ppm	<span style="border: 1px solid black; padding: 2px;">23.01</span> ppm	<span style="border: 1px solid black; padding: 2px;">23.35</span> ppm

**Process Data**

Exhaust Flow	<span style="border: 1px solid black; padding: 2px;">142855</span> dscfm	<span style="border: 1px solid black; padding: 2px;">143642</span> dscfm	<span style="border: 1px solid black; padding: 2px;">144504</span> dscfm
F-Factor	<span style="border: 1px solid black; padding: 2px;">8710</span> dscf/MMBtu	<span style="border: 1px solid black; padding: 2px;">8710</span> dscf/MMBtu	<span style="border: 1px solid black; padding: 2px;">8710</span> dscf/MMBtu

*Equations used;*

$T_{fact} = (10^{-6} * (29.92 / (21.85 * (460 + T_{std})))) * 60$

$lb/hr = [ppmv] * Q * MW * (T_{fact})$

$lb/MM\ Btu = [lb/hr] / [MMBtu/hr]$

$ppmv @ 15\% O_2 = ppm * 5.9(20.9 / (20.9 - O_2))$

$MW\ NO_x = 46; CO = 28$

**CALCULATED EMISSIONS**

NOx	<span style="border: 1px solid black; padding: 2px;">10.5</span> ppm @ 15% O2	<span style="border: 1px solid black; padding: 2px;">10.4</span> ppm @ 15% O2	<span style="border: 1px solid black; padding: 2px;">10.3</span> ppm @ 15% O2
	<span style="border: 1px solid black; padding: 2px;">11.69</span> lb/hr	<span style="border: 1px solid black; padding: 2px;">11.63</span> lb/hr	<span style="border: 1px solid black; padding: 2px;">11.61</span> lb/hr
	<span style="border: 1px solid black; padding: 2px;">0.0013</span> lb/MMBtu	<span style="border: 1px solid black; padding: 2px;">0.0013</span> lb/MMBtu	<span style="border: 1px solid black; padding: 2px;">0.0013</span> lb/MMBtu
CO	<span style="border: 1px solid black; padding: 2px;">19.4</span> ppm @ 15% O2	<span style="border: 1px solid black; padding: 2px;">21.2</span> ppm @ 15% O2	<span style="border: 1px solid black; padding: 2px;">21.4</span> ppm @ 15% O2
	<span style="border: 1px solid black; padding: 2px;">13.17</span> lb/hr	<span style="border: 1px solid black; padding: 2px;">14.40</span> lb/hr	<span style="border: 1px solid black; padding: 2px;">14.70</span> lb/hr
	<span style="border: 1px solid black; padding: 2px;">0.0015</span> lb/MMBtu	<span style="border: 1px solid black; padding: 2px;">0.0017</span> lb/MMBtu	<span style="border: 1px solid black; padding: 2px;">0.0017</span> lb/MMBtu

## Compliance Bias Adjustment

Facility: New Indy  
 Source: Turbine  
 Date: 03/03/20

### Compliance Testing Run No. 1

Parameter	Measured Conc. (ppm,%)	Reference Span gas (ppm.%)	Initial Bias Zero (ppm.%)	Final Bias Zero (ppm.%)	Average Bias Zero (ppm.%)	Initial Bias Span (ppm.%)	Final Bias Span (ppm.%)	Average Bias Span (ppm.%)	Bias Adjusted Conc. (ppm.%)
NOx	11.44	12.2	0.0	0.0	0.0	12.2	12.2	12.2	<b>11.43</b>
O2	14.46	12.1	0.0	0.0	0.0	12.1	12.1	12.1	<b>14.47</b>
CO	21.22	40.0	0.1	0.0	0.0	40.2	40.0	40.1	<b>21.16</b>

### Run No. 2

Parameter	Measured Conc. (ppm,%)	Reference Span gas (ppm.%)	Initial Bias Zero (ppm.%)	Final Bias Zero (ppm.%)	Average Bias Zero (ppm.%)	Initial Bias Span (ppm.%)	Final Bias Span (ppm.%)	Average Bias Span (ppm.%)	Bias Adjusted Conc. (ppm.%)
NOx	11.32	12.2	0.0	0.0	0.0	12.2	12.2	12.2	<b>11.31</b>
O2	14.48	12.1	0.0	0.0	0.0	12.1	12.1	12.1	<b>14.50</b>
CO	23.01	40.0	0.0	0.0	0.0	40.0	40.0	40.0	<b>23.01</b>

### Run No. 3

Parameter	Measured Conc. (ppm,%)	Reference Span gas (ppm.%)	Initial Bias Zero (ppm.%)	Final Bias Zero (ppm.%)	Average Bias Zero (ppm.%)	Initial Bias Span (ppm.%)	Final Bias Span (ppm.%)	Average Bias Span (ppm.%)	Bias Adjusted Conc. (ppm.%)
NOx	11.24	12.2	0.0	0.0	0.0	12.2	12.2	12.2	<b>11.23</b>
O2	14.46	12.1	0.0	0.0	0.0	12.1	12.1	12.1	<b>14.47</b>
CO	23.33	40.0	0.0	0.0	0.0	40.0	39.9	40.0	<b>23.35</b>

## RATA Bias Adjustment

Facility: New Indy  
 Source: Turbine  
 Date: 03/03/20

### Run No. 1

Parameter	Measured Conc. (ppm,%)	Reference Span gas (ppm,%)	Initial Zero (ppm,%)	Final Zero (ppm,%)	Average Zero (ppm,%)	Initial Span (ppm,%)	Final Span (ppm,%)	Average Span (ppm,%)	Adjusted Conc. (ppm,%)
NOx	11.70	12.2	0.0	0.0	0.0	12.2	12.2	12.2	<b>11.71</b>
O2	14.44	12.1	0.0	0.0	0.0	12.1	12.1	12.1	<b>14.45</b>
CO	20.99	40.0	0.0	0.0	0.0	40.0	39.9	40.0	<b>21.00</b>

### Run No. 2

Parameter	Measured Conc. (ppm,%)	Reference Span gas (ppm,%)	Initial Zero (ppm,%)	Final Zero (ppm,%)	Average Zero (ppm,%)	Initial Span (ppm,%)	Final Span (ppm,%)	Average Span (ppm,%)	Adjusted Conc. (ppm,%)
NOx	11.36	12.2	0.0	0.0	0.0	12.2	12.2	12.2	<b>11.36</b>
O2	14.45	12.1	0.0	0.0	0.0	12.1	12.1	12.1	<b>14.46</b>
CO	20.73	40.0	0.0	0.0	0.0	40.0	39.9	40.0	<b>20.74</b>

### Run No. 3

Parameter	Measured Conc. (ppm,%)	Reference Span gas (ppm,%)	Initial Zero (ppm,%)	Final Zero (ppm,%)	Average Zero (ppm,%)	Initial Span (ppm,%)	Final Span (ppm,%)	Average Span (ppm,%)	Adjusted Conc. (ppm,%)
NOx	11.24	12.2	0.0	0.0	0.0	12.2	12.2	12.2	<b>11.25</b>
O2	14.52	12.1	0.0	0.0	0.0	12.1	12.1	12.1	<b>14.53</b>
CO	21.97	40.0	0.0	0.0	0.0	40.0	40.0	40.0	<b>21.96</b>

### Run No. 4

Parameter	Measured Conc. (ppm,%)	Reference Span gas (ppm,%)	Initial Zero (ppm,%)	Final Zero (ppm,%)	Average Zero (ppm,%)	Initial Span (ppm,%)	Final Span (ppm,%)	Average Span (ppm,%)	Adjusted Conc. (ppm,%)
NOx	11.09	12.2	0.0	0.0	0.0	12.2	12.2	12.2	<b>11.10</b>
O2	14.47	12.1	0.0	0.0	0.0	12.1	12.1	12.1	<b>14.48</b>
CO	22.31	40.0	0.0	0.0	0.0	40.0	40.0	40.0	<b>22.30</b>

### Run No. 5

Parameter	Measured Conc. (ppm,%)	Reference Span gas (ppm,%)	Initial Zero (ppm,%)	Final Zero (ppm,%)	Average Zero (ppm,%)	Initial Span (ppm,%)	Final Span (ppm,%)	Average Span (ppm,%)	Adjusted Conc. (ppm,%)
NOx	11.36	12.2	0.0	0.0	0.0	12.2	12.2	12.2	<b>11.36</b>
O2	14.48	12.1	0.0	0.0	0.0	12.1	12.1	12.1	<b>14.48</b>
CO	23.34	40.0	0.0	0.0	0.0	40.0	40.0	40.0	<b>23.33</b>

## RATA Bias Adjustment

Facility: New Indy  
 Source: Turbine  
 Date: 03/03/20

### Run No. 6

Parameter	Measured Conc. (ppm,%)	Reference Span gas (ppm.%)	Initial Zero (ppm.%)	Final Zero (ppm.%)	Average Zero (ppm.%)	Initial Span (ppm.%)	Final Span (ppm.%)	Average Span (ppm.%)	Adjusted Conc. (ppm.%)
NOx	11.54	12.2	0.0	0.0	0.0	12.2	12.2	12.2	<b>11.54</b>
O2	14.50	12.1	0.0	0.0	0.0	12.1	12.1	12.1	<b>14.50</b>
CO	23.39	40.0	0.0	0.0	0.0	40.0	40.0	40.0	<b>23.38</b>

### Run No. 7

Parameter	Measured Conc. (ppm,%)	Reference Span gas (ppm.%)	Initial Zero (ppm.%)	Final Zero (ppm.%)	Average Zero (ppm.%)	Initial Span (ppm.%)	Final Span (ppm.%)	Average Span (ppm.%)	Adjusted Conc. (ppm.%)
NOx	11.42	12.2	0.0	0.0	0.01	12.2	12.1	12.1	<b>11.46</b>
O2	14.50	12.1	0.0	0.0	0.01	12.1	12.1	12.1	<b>14.51</b>
CO	23.54	40.0	0.0	0.0	0.02	40.0	40.3	40.2	<b>23.44</b>

### Run No. 8

Parameter	Measured Conc. (ppm,%)	Reference Span gas (ppm.%)	Initial Zero (ppm.%)	Final Zero (ppm.%)	Average Zero (ppm.%)	Initial Span (ppm.%)	Final Span (ppm.%)	Average Span (ppm.%)	Adjusted Conc. (ppm.%)
NOx	11.14	12.2	0.0	0.0	0.0	12.2	12.0	12.1	<b>11.21</b>
O2	14.46	12.1	0.0	0.0	0.0	12.1	12.0	12.0	<b>14.56</b>
CO	23.34	40.0	0.0	0.0	0.0	40.0	40.3	40.2	<b>23.25</b>

### Run No. 9

Parameter	Measured Conc. (ppm,%)	Reference Span gas (ppm.%)	Initial Zero (ppm.%)	Final Zero (ppm.%)	Average Zero (ppm.%)	Initial Span (ppm.%)	Final Span (ppm.%)	Average Span (ppm.%)	Adjusted Conc. (ppm.%)
NOx	11.13	12.2	0.0	0.0	0.0	12.2	12.2	12.2	<b>11.12</b>
O2	14.41	12.1	0.0	0.0	0.0	12.1	12.1	12.1	<b>14.42</b>
CO	23.13	40.0	0.0	0.0	0.0	40.0	40.1	40.1	<b>23.09</b>

**FIELD DATA & CALCULATIONS SUMMARY**

Client: **New Indy**  
Site: **Oxnard**  
Unit: **Turbine**

Date: **3/3/2020**  
Type: **T std = 68 °F**  
Run: **1-NH3**

<b>Vm</b>	Metered Sample Gas Volume	<b>69.587</b>	<b>dcf</b>		
<b>Lp</b>	Avg. Leak Rate	<b>0.002</b>	<b>cf</b>		
<b>Vn</b>	Leak Corrected Sample Gas Volume	<b>69.587</b>	<b>dcf</b>		
<b>Y</b>	Dry Gas Meter Calibration Factor	<b>1.0108</b>			
<b>Pbar</b>	Barometric Pressure	<b>29.97</b>	<b>in. Hg</b>		
<b>del H</b>	Dry Gas Meter Press. Differential, Average	<b>1.8</b>	<b>in. H2O</b>		
<b>Tm</b>	Dry Gas Meter Temperature, Average	<b>66.6</b>	<b>°F</b>	<b>526.6</b>	<b>°R</b>
<b>Vm(std)</b>	Sample Gas Volume	<b>70.9534</b>	<b>dscf</b>		
<b>O2</b>	Oxygen, Dry	<b>14.5</b>	<b>%</b>		
<b>Theta</b>	Sampling Time	<b>96</b>	<b>min.</b>		

**CALCULATED EMISSION RESULTS**

Client: **New Indy**  
Site: **Oxnard**  
Unit: **Turbine**

Date: **3/3/2020**  
Type: **T std = 68 °F**  
Run: **1-NH3**

**AMMONIA AS NH3**

<b>Ws</b>	Ammonia Weight	<b>0.0022</b>	<b>g</b>
<b>Cs</b>	Ammonia Emissions	<b>0.00048</b>	<b>grain/dscf</b>
	Ammonia Concentration	<b>1.5</b>	<b>ppmv</b>
	Ammonia Concentration	<b>1.4</b>	<b>ppmv @ 15% O2</b>

**FIELD DATA & CALCULATIONS SUMMARY**

Client: **New Indy**  
 Site: **Oxnard**  
 Unit: **Turbine**

Date: **3/3/2020**  
 Type: **T std = 68 °F**  
 Run: **2-NH3**

<b>Vm</b>	Metered Sample Gas Volume	<b>72.022</b>	<b>dcf</b>		
<b>Lp</b>	Avg. Leak Rate	<b>0.002</b>	<b>cf</b>		
<b>Vn</b>	Leak Corrected Sample Gas Volume	<b>72.022</b>	<b>dcf</b>		
<b>Y</b>	Dry Gas Meter Calibration Factor	<b>1.0108</b>			
<b>Pbar</b>	Barometric Pressure	<b>29.99</b>	<b>in. Hg</b>		
<b>del H</b>	Dry Gas Meter Press. Differential, Average	<b>1.8</b>	<b>in. H2O</b>		
<b>Tm</b>	Dry Gas Meter Temperature, Average	<b>72.7</b>	<b>°F</b>	<b>532.7</b>	<b>°R</b>
<b>Vm(std)</b>	Sample Gas Volume	<b>72.6435</b>	<b>dscf</b>		
<b>O2</b>	Oxygen, Dry	<b>14.5</b>	<b>%</b>		
<b>Theta</b>	Sampling Time	<b>96</b>	<b>min.</b>		

**CALCULATED EMISSION RESULTS**

Client: **New Indy**  
 Site: **Oxnard**  
 Unit: **Turbine**

Date: **3/3/2020**  
 Type: **T std = 68 °F**  
 Run: **2-NH3**

**AMMONIA AS NH3**

<b>Ws</b>	Ammonia Weight	<b>0.00253</b>	<b>g</b>
<b>Cs</b>	Ammonia Emissions	<b>0.00054</b>	<b>grain/dscf</b>
	Ammonia Concentration	<b>1.7</b>	<b>ppmv</b>
	Ammonia Concentration	<b>1.6</b>	<b>ppmv @ 15% O2</b>

**FIELD DATA & CALCULATIONS SUMMARY**

Client: **New Indy**  
Site: **Oxnard**  
Unit: **Turbine**

Date: **3/3/2020**  
Type: **T std = 68 °F**  
Run: **3-NH3**

<b>Vm</b>	Metered Sample Gas Volume	<b>72.145</b>	<b>dcf</b>		
<b>Lp</b>	Avg. Leak Rate	<b>0.001</b>	<b>cf</b>		
<b>Vn</b>	Leak Corrected Sample Gas Volume	<b>72.145</b>	<b>dcf</b>		
<b>Y</b>	Dry Gas Meter Calibration Factor	<b>1.0108</b>			
<b>Pbar</b>	Barometric Pressure	<b>29.97</b>	<b>in. Hg</b>		
<b>del H</b>	Dry Gas Meter Press. Differential, Average	<b>1.8</b>	<b>in. H2O</b>		
<b>Tm</b>	Dry Gas Meter Temperature, Average	<b>77.1</b>	<b>°F</b>	<b>537.1</b>	<b>°R</b>
<b>Vm(std)</b>	Sample Gas Volume	<b>72.1167</b>	<b>dscf</b>		
<b>O2</b>	Oxygen, Dry	<b>14.5</b>	<b>%</b>		
<b>Theta</b>	Sampling Time	<b>96</b>	<b>min.</b>		

**CALCULATED EMISSION RESULTS**

Client: **New Indy**  
Site: **Oxnard**  
Unit: **Turbine**

Date: **3/3/2020**  
Type: **T std = 68 °F**  
Run: **3-NH3**

**AMMONIA AS NH3**

<b>Ws</b>	Ammonia Weight	<b>0.00215</b>	<b>g</b>		
<b>Cs</b>	Ammonia Emissions	<b>0.00046</b>	<b>grain/dscf</b>		
	Ammonia Concentration	<b>1.5</b>	<b>ppmv</b>		
	Ammonia Concentration	<b>1.3</b>	<b>ppmv @ 15% O2</b>		

**"F" FACTOR EXHAUST GAS FLOWRATE CALCULATION**

Client : New Indy  
 Site : Oxnard  
 Unit : Turbine

Date : 3/3/2020  
 Job# : 23022  
 Lab# : 219-012

"F" Factor, Q(std):  dscf/MMBTU

Standard Temperature, T std:  deg. F

	<i>Run 1</i>	<i>Run 2</i>	<i>Run 3</i>
Oxygen, % (avg)	14.5	14.5	14.5
Fuel Usage, dscfm (avg)	4804.9	4810.1	4862.7
MMBTU/min	5.0452	5.0506	5.1058
Flowrate ("F" Factor), dscfm	142855	143642	144504

*formulae:*

$$\text{MMBTU/min} = (\text{Fuel Usage} * 1050 \text{ Btu/ft}^3) / 10^6$$

$$\text{Flowrate ("F" Factor)} = \text{"F" Factor} * \text{MMBTU/min} * (20.0 / (20.9 - O_2))$$



**LABORATORY ANALYSIS**



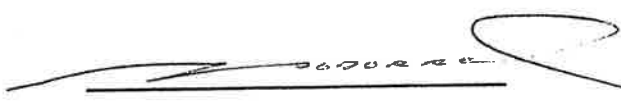
Client: New Indy  
 Site: Oxnard  
 Unit: Turbine

 Analysis Date: 3/3/2020  
 Lab: 220-017

Run#:	Sample Volume (ml)	Aliquot Volume (ml)	Reading ug/ml	Dilution
<u>R1</u>	<u>440</u>	<u>49</u>	<u>4.09</u>	<u>1</u>
	Total NH3 mg/sample		<u>2.20</u>	
<u>R-2</u>	<u>361</u>	<u>49</u>	<u>5.70</u>	<u>1</u>
	Total NH3 mg/sample		<u>2.53</u>	
<u>R-3</u>	<u>369</u>	<u>49</u>	<u>4.75</u>	<u>1</u>
	Total NH3 mg/sample		<u>2.15</u>	
<u>R1 (Duplicate)</u>	<u>440</u>	<u>49</u>	<u>4.15</u>	<u>1</u>
	Total NH3 mg/sample		<u>2.23</u>	
<u>0.1 N HCL Blank</u>	<u>200</u>	<u>49</u>	<u>0.05</u>	<u>1</u>
<u>R-1</u>	<u>440</u>	<u>48</u>	<u>5.19</u>	<u>1</u>
Spike (1 ug/ml)	Theoretical Value =		<u>5.00</u>	(ug/ml)
% Recovery			<u>103.8</u>	%
Total NH3 mg/sample = (ug/ml-HCl blank)*60.71*Dilution*Sample Vol/(Aliquot*1000)				
Analyst:	<u>Ferodie Torres</u>			

Client: NEW INDY  
Site: OXNARD, CA  
Unit: TURBINE

Analysis Date: 03-04-20  
Lab: 220

Run#:	Sample Volume (ml)	Aliquot Volume (ml)	Reading ug/ml	Dilution
<u>R1</u>	<u>440</u>	<u>49</u>	<u>4.09</u>	<u>1</u>
<u>R-2</u>	<u>361</u>	<u>49</u>	<u>5.70</u>	<u>1</u>
<u>R-3</u>	<u>369</u>	<u>49</u>	<u>4.75</u>	<u>1</u>
<u>Run #: R- 1</u> (Duplicate)	<u>440</u>	<u>49</u>	<u>4.15</u>	<u>1</u>
<u>0.1 N HCL Blank</u>	<u>200</u>	<u>49</u>	<u>0.05</u>	<u>1</u>
<u>Run #: R- 1</u>	<u>440</u>	<u>48</u>	<u>5.09</u>	<u>1</u>
<u>Spike (1 ug/ml)</u>	<u>Theoretical Value =</u>		<u>5.00</u>	<u>(ug/ml)</u>
<u>Analyst:</u>				<u>Date: 03-04-20</u>

CAL: 1.0 = ~~4.09~~ 1.01  
5.0 = 5.05  
10.0 = 10.3  
(STANDARD) = READING

**FIELD DATA & STRIP CHARTS**



**EMISSIONS TEST - CARB 100**

Date: 3/3/2020

**\*\* Test Information \*\***

Client: New Indy  
 County: Ventura  
 Site(s): Oxnard  
 Unit(s): Turbine

**\*\* Personnel \*\***

AIRx: KK/WH  
 Client: RL  
 APCD: -

Run Length:	96/32	Inlet ( )	Outlet (X)	Fuel ( )	HC ( )	
No. Points:	96/32	S.T. (X)	E.I. ( )	Data ( )	H2S ( )	NH3 ( )

	Time	Baro.	Temp.	Weather.
Arrive:	6:00 AM	29.90	54	Clear
Depart:	2:00 PM	29.86	60	Clear

**\*\* Instrument Information \*\***

Instrument	"On"	Unit#	Make/Model
O2:	1	12	Servomex
CO:	1	3	API 300EM
NOx:	1	3	API 200EH

Recorder: Soltech 10 cm/hr

**\*\* Calibration Information \*\***

	Units	Zero	Span	Range	Gas Cyl.#	Gas Flow
O2:	%	0	12.1	25	SA17161	0.8
O2:	%	0	19.9	25	ALM024672	0.8
CO:	ppmv	0	40.0	100	CC272657	1
CO:	ppmv	0	81.3	100	EB0020337	1
NOx:	ppmv	0	12.2	25	CC99748	1
NOx:	ppmv	0	19.8	25	CC27837	1
NO2:	ppmv	0	21.4	25	CC121480	1

**\*\* Recorder Information \*\***

	Chanl.	Pen Type	Color
O2: %	2	Cont.	Green
CO: ppmv	3	Cont.	Puple
NOx: ppmv	1	Cont.	Brown

CLIENT:  
 PLANT:  
 DATE:  
 ENGINEER:

Newbury  
 Oxnard  
 3/3/2020  
 KK/AWH

JOB#  
 RUN#  
 RUN START:

219-012  
 Compliance R1  
 8:12 AM

NOx. ppm	CO. ppm	O2. %	NOx. ppm @ 15% O2	CO. ppm @ 15% O2	TIME
<b>11.44</b>	<b>21.22</b>	<b>14.46</b>	<b>10.5</b>	<b>19.4</b>	<b>Averages</b>
11.51	21.87	14.46	10.6	20.1	8:12
11.67	21.82	14.45	10.7	20.0	8:13
11.68	21.70	14.41	10.6	19.7	8:14
11.78	21.61	14.45	10.8	19.8	8:15
12.01	21.32	14.44	11.0	19.5	8:16
12.19	21.31	14.43	11.1	19.4	8:17
11.98	21.30	14.44	10.9	19.4	8:18
11.87	21.21	14.44	10.8	19.4	8:19
11.86	21.12	14.44	10.8	19.3	8:20
11.82	21.16	14.44	10.8	19.3	8:21
11.72	21.16	14.44	10.7	19.3	8:22
11.69	21.10	14.45	10.7	19.3	8:23
11.77	21.19	14.45	10.8	19.4	8:24
11.88	21.21	14.46	10.9	19.4	8:25
11.92	21.17	14.46	10.9	19.4	8:26
11.82	21.29	14.47	10.8	19.5	8:27
11.84	21.28	14.47	10.9	19.5	8:28
11.81	21.10	14.48	10.9	19.4	8:29
11.70	21.09	14.48	10.8	19.4	8:30
11.60	21.25	14.48	10.7	19.5	8:31
11.57	21.16	14.48	10.6	19.5	8:32
11.45	20.89	14.47	10.5	19.2	8:33
11.46	20.71	14.45	10.5	19.0	8:34
11.59	20.58	14.43	10.6	18.8	8:35
11.65	20.40	14.42	10.6	18.6	8:36
11.60	20.30	14.40	10.5	18.4	8:37
11.55	20.22	14.39	10.5	18.3	8:38
11.57	20.24	14.40	10.5	18.4	8:39
11.57	20.19	14.40	10.5	18.3	8:40
11.56	20.30	14.41	10.5	18.5	8:41
11.53	20.41	14.42	10.5	18.6	8:42
11.50	20.44	14.42	10.5	18.6	8:43
11.54	20.53	14.43	10.5	18.7	8:44
11.48	20.58	14.44	10.5	18.8	8:45
11.36	20.65	14.45	10.4	18.9	8:46
11.36	20.76	14.45	10.4	19.0	8:47
11.38	20.74	14.44	10.4	19.0	8:48
11.36	20.78	14.45	10.4	19.0	8:49
11.34	20.76	14.45	10.4	19.0	8:50
11.36	20.89	14.46	10.4	19.2	8:51
11.30	20.61	14.47	10.4	18.9	8:52
11.33	20.84	14.47	10.4	19.1	8:53
11.36	21.02	14.46	10.4	19.3	8:54
11.27	21.03	14.51	10.4	19.4	8:55
11.03	20.69	14.46	10.1	19.0	8:56
11.14	20.65	14.44	10.2	18.9	8:57
11.44	20.48	14.41	10.4	18.6	8:58
11.48	20.44	14.41	10.4	18.6	8:59
11.66	20.35	14.40	10.6	18.5	9:00
11.70	20.30	14.39	10.6	18.4	9:01
11.74	20.29	14.40	10.7	18.4	9:02
11.72	20.41	14.40	10.7	18.5	9:03
11.62	20.46	14.42	10.6	18.6	9:04
11.53	20.55	14.44	10.5	18.8	9:05
11.50	20.48	14.44	10.5	18.7	9:06
11.44	20.65	14.45	10.5	18.9	9:07
11.46	20.65	14.46	10.5	18.9	9:08
11.38	20.88	14.47	10.4	19.2	9:09
11.31	20.81	14.48	10.4	19.1	9:10
11.30	20.66	14.48	10.4	19.0	9:11
11.32	20.76	14.48	10.4	19.1	9:12
11.33	20.87	14.49	10.4	19.2	9:13
11.19	21.11	14.47	10.3	19.4	9:14
10.96	21.20	14.45	10.0	19.4	9:15
10.89	21.23	14.44	10.0	19.4	9:16
10.91	21.42	14.44	10.0	19.6	9:17
10.89	21.51	14.43	9.9	19.6	9:18
11.01	21.43	14.42	10.0	19.5	9:19
11.14	21.44	14.43	10.2	19.6	9:20
11.20	21.65	14.45	10.2	19.8	9:21
11.16	21.95	14.46	10.2	20.1	9:22
11.16	21.89	14.48	10.3	20.1	9:23
11.08	21.99	14.49	10.2	20.2	9:24
11.00	22.07	14.50	10.1	20.3	9:25
10.96	22.13	14.49	10.1	20.4	9:26
11.03	22.39	14.49	10.2	20.6	9:27
11.04	22.39	14.50	10.2	20.7	9:28
11.06	22.57	14.51	10.2	20.8	9:29
11.07	22.45	14.52	10.2	20.8	9:30
11.08	22.33	14.52	10.2	20.6	9:31
11.15	22.34	14.50	10.3	20.6	9:32
11.14	22.36	14.50	10.3	20.6	9:33
11.10	22.11	14.48	10.2	20.3	9:34
11.28	21.97	14.47	10.4	20.2	9:35
11.48	21.73	14.46	10.5	19.9	9:36
11.43	21.68	14.45	10.5	19.8	9:37
11.39	21.75	14.46	10.4	19.9	9:38
11.46	21.56	14.46	10.5	19.8	9:39
11.51	21.74	14.47	10.6	20.0	9:40
11.49	21.81	14.48	10.6	20.1	9:41
11.42	21.98	14.49	10.5	20.2	9:42
11.44	21.93	14.49	10.5	20.2	9:43
11.47	21.83	14.49	10.6	20.1	9:44
11.57	21.99	14.48	10.6	20.2	9:45
11.46	22.15	14.51	10.6	20.5	9:46
11.41	22.14	14.51	10.5	20.5	9:47
11.34	22.19	14.52	10.5	20.5	9:48



CLIENT: New Av  
 PLANT: Oxnard  
 DATE: 3/3/2020  
 ENGINEER: KK/WH

JOB#: 219-012  
 RUN#: Compliance R2  
 RUN START: 10:00 AM

NOx, ppm	CO, ppm	O2, %	NOx, ppm @ 15% O2	CO, ppm @ 15% O2	TIME
<b>11.32</b>	<b>23.01</b>	<b>14.48</b>	<b>10.4</b>	<b>21.2</b>	<b>Averages</b>
11.55	19.04	14.54	10.7	17.7	10:00
11.92	21.41	14.48	11.0	19.7	10:01
11.96	21.68	14.48	11.0	19.9	10:02
11.76	21.93	14.49	10.8	20.2	10:03
11.60	21.81	14.50	10.7	20.1	10:04
11.54	21.73	14.51	10.7	20.1	10:05
11.49	21.70	14.51	10.6	20.1	10:06
11.41	21.84	14.51	10.5	20.2	10:07
11.30	21.98	14.51	10.4	20.3	10:08
11.04	22.05	14.49	10.2	20.3	10:09
10.84	22.11	14.48	10.0	20.3	10:10
10.57	22.38	14.48	9.7	20.6	10:11
10.31	22.34	14.47	9.5	20.5	10:12
10.31	22.23	14.46	9.5	20.4	10:13
10.39	22.21	14.45	9.5	20.3	10:14
10.43	22.04	14.42	9.5	20.1	10:15
10.66	21.99	14.41	9.7	20.0	10:16
10.99	22.02	14.41	10.0	20.0	10:17
11.03	22.20	14.42	10.0	20.2	10:18
10.93	22.36	14.44	10.0	20.4	10:19
10.99	22.52	14.45	10.1	20.6	10:20
11.15	22.72	14.46	10.2	20.8	10:21
11.09	23.04	14.45	10.2	21.1	10:22
11.02	23.26	14.48	10.1	21.4	10:23
11.10	23.10	14.48	10.2	21.3	10:24
11.11	23.30	14.49	10.2	21.4	10:25
11.00	23.19	14.49	10.1	21.4	10:26
10.98	22.98	14.49	10.1	21.2	10:27
11.08	23.10	14.49	10.2	21.3	10:28
11.09	23.02	14.48	10.2	21.2	10:29
11.11	22.92	14.46	10.2	21.0	10:30
11.12	23.07	14.46	10.2	21.1	10:31
11.10	23.02	14.46	10.2	21.1	10:32
11.27	22.80	14.44	10.3	20.8	10:33
11.43	22.86	14.44	10.4	20.9	10:34
11.43	22.78	14.44	10.4	20.8	10:35
11.47	22.73	14.45	10.5	20.8	10:36
11.57	22.90	14.46	10.6	21.0	10:37
11.47	23.08	14.47	10.5	21.2	10:38
11.48	23.13	14.48	10.6	21.3	10:39
11.36	23.32	14.49	10.5	21.5	10:40
11.28	23.27	14.49	10.4	21.4	10:41
11.25	23.36	14.50	10.4	21.6	10:42
11.18	23.53	14.50	10.3	21.7	10:43
11.08	23.72	14.51	10.2	21.9	10:44
11.02	23.52	14.51	10.2	21.7	10:45
11.11	23.54	14.50	10.2	21.7	10:46
11.18	23.61	14.50	10.3	21.8	10:47
11.23	23.46	14.49	10.4	21.6	10:48
11.38	23.29	14.48	10.5	21.4	10:49
11.51	23.03	14.47	10.6	21.1	10:50
11.39	23.12	14.46	10.4	21.2	10:51
11.30	22.99	14.45	10.3	21.0	10:52
11.43	22.94	14.43	10.4	20.9	10:53
11.54	23.27	14.45	10.6	21.3	10:54
11.46	23.23	14.45	10.5	21.3	10:55
11.35	23.44	14.46	10.4	21.5	10:56
11.25	23.68	14.49	10.4	21.8	10:57
11.30	23.58	14.49	10.4	21.7	10:58
11.45	23.73	14.50	10.6	21.9	10:59
11.38	23.60	14.51	10.5	21.8	11:00
11.32	23.70	14.51	10.5	21.9	11:01
11.39	23.81	14.51	10.5	22.0	11:02
11.36	23.74	14.52	10.5	21.9	11:03
11.46	23.71	14.52	10.6	21.9	11:04
11.64	23.76	14.52	10.8	22.0	11:05
11.68	23.72	14.52	10.8	21.9	11:06
11.57	23.62	14.52	10.7	21.8	11:07
11.54	23.61	14.51	10.7	21.8	11:08
11.54	23.57	14.50	10.6	21.7	11:09
11.54	23.46	14.49	10.6	21.6	11:10
11.43	23.55	14.48	10.5	21.7	11:11
11.38	23.39	14.48	10.5	21.5	11:12
11.59	23.14	14.48	10.7	21.3	11:13
11.68	23.11	14.48	10.7	21.2	11:14
11.61	23.18	14.48	10.7	21.3	11:15
11.66	23.26	14.49	10.7	21.4	11:16
11.59	23.33	14.50	10.7	21.5	11:17
11.46	23.35	14.50	10.6	21.5	11:18
11.42	23.48	14.51	10.5	21.7	11:19
11.43	23.54	14.51	10.6	21.7	11:20
11.45	23.53	14.52	10.6	21.8	11:21
11.44	23.73	14.51	10.6	21.9	11:22
11.49	23.71	14.51	10.6	21.9	11:23
11.52	23.54	14.52	10.6	21.8	11:24
11.51	23.63	14.52	10.6	21.8	11:25
11.48	23.62	14.52	10.6	21.8	11:26
11.48	23.50	14.51	10.6	21.7	11:27
11.52	23.48	14.50	10.6	21.7	11:28
11.53	23.37	14.49	10.6	21.5	11:29
11.50	23.29	14.48	10.6	21.4	11:30
11.61	23.18	14.47	10.7	21.3	11:31
11.58	23.05	14.47	10.6	21.2	11:32
11.53	23.05	14.47	10.6	21.2	11:33
11.61	23.02	14.48	10.7	21.2	11:34
11.68	22.97	14.49	10.7	21.1	11:35
11.61	23.07	14.49	10.7	21.2	11:36

CLIENT: N. Adv JOB# 219-012  
 PLANT: Oxnard RUN# Compliance R3  
 DATE: 3/3/2020 RUN START: 12:00 PM  
 ENGINEER: KK/WH

NOx. ppm	CO. ppm	O2. %	NOx. ppm @ 15% O2	CO. ppm @ 15% O2	TIME
<b>11.24</b>	<b>23.33</b>	<b>14.46</b>	<b>10.3</b>	<b>21.4</b>	<b>Averages</b>
11.25	23.46	14.51	10.4	21.7	12:00
11.59	23.54	14.52	10.7	21.8	12:01
11.77	23.52	14.53	10.9	21.8	12:02
11.68	23.65	14.53	10.8	21.9	12:03
11.51	23.64	14.51	10.6	21.8	12:04
11.44	23.68	14.52	10.6	21.9	12:05
11.39	23.82	14.53	10.5	22.1	12:06
11.35	23.82	14.52	10.5	22.0	12:07
11.28	23.75	14.53	10.4	22.0	12:08
11.27	23.60	14.52	10.4	21.8	12:09
11.29	23.63	14.51	10.4	21.8	12:10
11.39	23.45	14.50	10.5	21.6	12:11
11.54	23.27	14.48	10.6	21.4	12:12
11.68	23.25	14.47	10.7	21.4	12:13
11.66	23.20	14.46	10.7	21.3	12:14
11.58	23.21	14.45	10.6	21.2	12:15
11.55	23.16	14.46	10.6	21.2	12:16
11.40	23.18	14.46	10.4	21.2	12:17
11.29	23.37	14.47	10.4	21.4	12:18
11.28	23.40	14.47	10.4	21.5	12:19
11.38	23.66	14.47	10.4	21.7	12:20
11.46	23.65	14.47	10.5	21.7	12:21
11.44	23.60	14.49	10.5	21.7	12:22
11.51	23.65	14.49	10.6	21.8	12:23
11.45	23.82	14.51	10.6	22.0	12:24
11.37	23.65	14.50	10.5	21.8	12:25
11.29	23.76	14.51	10.4	21.9	12:26
11.24	23.81	14.52	10.4	22.0	12:27
11.24	23.82	14.51	10.4	22.0	12:28
11.30	23.69	14.51	10.4	21.9	12:29
11.36	23.47	14.51	10.5	21.7	12:30
11.39	23.37	14.50	10.5	21.5	12:31
11.32	23.34	14.49	10.4	21.5	12:32
11.24	23.24	14.48	10.3	21.3	12:33
11.27	23.25	14.48	10.4	21.4	12:34
11.28	23.06	14.46	10.3	21.1	12:35
11.33	23.08	14.45	10.4	21.1	12:36
11.30	23.07	14.44	10.3	21.1	12:37
11.24	23.15	14.44	10.3	21.2	12:38
11.25	23.15	14.44	10.3	21.1	12:39
11.20	23.27	14.46	10.3	21.3	12:40
11.13	23.31	14.47	10.2	21.4	12:41
11.01	23.51	14.48	10.1	21.6	12:42
11.10	23.68	14.49	10.2	21.8	12:43
11.14	23.62	14.50	10.3	21.8	12:44
11.05	23.66	14.50	10.2	21.8	12:45
10.94	23.59	14.50	10.1	21.8	12:46
10.97	23.78	14.51	10.1	22.0	12:47
10.95	23.86	14.52	10.1	22.1	12:48
11.01	23.67	14.51	10.2	21.9	12:49
11.03	23.68	14.51	10.2	21.9	12:50
10.92	23.66	14.49	10.1	21.8	12:51
10.90	23.53	14.47	10.0	21.6	12:52
11.02	23.31	14.45	10.1	21.3	12:53
11.10	23.10	14.42	10.1	21.0	12:54
11.13	23.03	14.40	10.1	20.9	12:55
11.00	22.84	14.39	10.0	20.7	12:56
10.92	22.75	14.39	9.9	20.6	12:57
11.03	22.84	14.40	10.0	20.7	12:58
11.16	22.96	14.41	10.2	20.9	12:59
11.32	23.13	14.42	10.3	21.1	13:00
11.52	23.29	14.44	10.5	21.3	13:01
11.45	23.38	14.45	10.5	21.4	13:02
11.33	23.56	14.46	10.4	21.6	13:03
11.19	23.64	14.47	10.3	21.7	13:04
11.09	23.72	14.48	10.2	21.8	13:05
11.05	23.95	14.48	10.2	22.0	13:06
11.08	23.95	14.48	10.2	22.0	13:07
11.07	23.77	14.47	10.2	21.8	13:08
11.14	23.73	14.46	10.2	21.8	13:09
11.14	23.73	14.45	10.2	21.7	13:10
11.09	23.60	14.45	10.1	21.6	13:11
11.13	23.39	14.43	10.1	21.3	13:12
11.25	23.18	14.41	10.2	21.1	13:13
11.31	22.94	14.38	10.2	20.8	13:14
11.31	22.61	14.35	10.2	20.4	13:15
11.33	22.14	14.32	10.2	19.9	13:16
11.36	21.80	14.29	10.1	19.5	13:17
11.43	21.71	14.27	10.2	19.3	13:18
11.55	21.68	14.29	10.3	19.3	13:19
11.63	21.87	14.31	10.4	19.6	13:20
11.73	22.07	14.32	10.5	19.8	13:21
11.79	22.36	14.35	10.6	20.2	13:22
11.69	22.54	14.38	10.6	20.4	13:23
11.44	22.77	14.39	10.4	20.7	13:24
11.19	23.07	14.41	10.2	21.0	13:25
11.02	23.22	14.42	10.0	21.2	13:26
10.92	23.29	14.42	10.0	21.2	13:27
10.95	23.29	14.43	10.0	21.2	13:28
10.86	23.41	14.44	9.9	21.4	13:29
10.78	23.40	14.45	9.9	21.4	13:30
10.68	23.56	14.45	9.8	21.6	13:31
10.66	23.75	14.46	9.8	21.7	13:32
10.73	23.78	14.45	9.8	21.8	13:33
10.78	23.77	14.44	9.9	21.7	13:34
10.77	23.79	14.44	9.8	21.7	13:35
10.74	23.85	14.44	9.8	21.8	13:36

CLIENT:	New Indy	JOB#	220-017
PLANT:	Oxnard, CA	RUN#	RATA 1
DATE:	3/3/2020	UNIT ID:	Turbine
ENGINEER:	KK/JT	RUN START:	8:12 AM

NOx, ppm	CO, ppm	O2, %	NOx, ppm @ 15% O2	CO, ppm @ 15% O2	TIME
11.51	21.87	14.46	10.55	20.05	8:12
11.67	21.82	14.45	10.67	19.95	8:13
11.68	21.70	14.41	10.61	19.73	8:14
11.78	21.61	14.45	10.77	19.75	8:15
12.01	21.32	14.44	10.97	19.47	8:16
12.19	21.31	14.43	11.12	19.44	8:17
11.98	21.30	14.44	10.94	19.44	8:18
11.87	21.21	14.44	10.84	19.37	8:19
11.86	21.12	14.44	10.83	19.29	8:20
11.82	21.16	14.44	10.80	19.33	8:21
11.72	21.16	14.44	10.71	19.33	8:22
11.69	21.10	14.45	10.69	19.29	8:23
11.77	21.19	14.45	10.77	19.39	8:24
11.88	21.21	14.46	10.88	19.43	8:25
11.92	21.17	14.46	10.93	19.41	8:26
11.82	21.29	14.47	10.84	19.53	8:27
11.84	21.28	14.47	10.86	19.52	8:28
11.81	21.10	14.48	10.85	19.39	8:29
11.70	21.09	14.48	10.76	19.39	8:30
11.60	21.25	14.48	10.67	19.54	8:31
11.57	21.16	14.48	10.64	19.46	8:32
11.45	20.89	14.47	10.50	19.16	8:33
11.46	20.71	14.45	10.49	18.96	8:34
11.59	20.58	14.43	10.58	18.77	8:35
11.65	20.40	14.42	10.60	18.57	8:36
11.60	20.30	14.40	10.53	18.43	8:37
11.55	20.22	14.39	10.47	18.33	8:38
11.57	20.24	14.40	10.50	18.37	8:39
11.57	20.19	14.40	10.51	18.34	8:40
11.56	20.30	14.41	10.51	18.45	8:41
11.53	20.41	14.42	10.50	18.58	8:42
11.50	20.44	14.42	10.48	18.62	8:43
11.54	20.53	14.43	10.53	18.73	8:44
<b>11.70</b>	<b>20.99</b>	<b>14.44</b>	<b>10.69</b>	<b>19.18</b>	<b>Averages</b>

CLIENT:	New Indy	JOB#	220-017
PLANT:	Oxnard, CA	RUN#	RATA 2
DATE:	3/3/2020	UNIT ID:	Turbine
ENGINEER:	KK/JT	RUN START:	8:45 AM

NOx, ppm	CO, ppm	O2, %	NOx, ppm @ 15% O2	CO, ppm @ 15% O2	TIME
11.48	20.58	14.44	10.49	18.80	8:45
11.36	20.65	14.45	10.39	18.88	8:46
11.36	20.76	14.45	10.38	18.98	8:47
11.38	20.74	14.44	10.40	18.95	8:48
11.36	20.78	14.45	10.40	19.02	8:49
11.34	20.76	14.45	10.37	19.00	8:50
11.36	20.89	14.46	10.41	19.15	8:51
11.30	20.61	14.47	10.36	18.90	8:52
11.33	20.84	14.47	10.39	19.11	8:53
11.36	21.02	14.46	10.41	19.26	8:54
11.27	21.03	14.51	10.41	19.42	8:55
11.03	20.69	14.46	10.11	18.97	8:56
11.14	20.65	14.44	10.17	18.85	8:57
11.44	20.48	14.41	10.40	18.62	8:58
11.48	20.44	14.41	10.43	18.57	8:59
11.66	20.35	14.40	10.58	18.47	9:00
11.70	20.30	14.39	10.61	18.41	9:01
11.74	20.29	14.40	10.65	18.41	9:02
11.72	20.41	14.40	10.65	18.54	9:03
11.62	20.46	14.42	10.58	18.62	9:04
11.53	20.55	14.44	10.53	18.76	9:05
11.50	20.48	14.44	10.50	18.71	9:06
11.44	20.65	14.45	10.47	18.89	9:07
11.46	20.65	14.46	10.50	18.93	9:08
11.38	20.88	14.47	10.44	19.16	9:09
11.31	20.81	14.48	10.39	19.11	9:10
11.30	20.66	14.48	10.38	18.98	9:11
11.32	20.76	14.48	10.42	19.10	9:12
11.33	20.87	14.49	10.43	19.22	9:13
11.19	21.11	14.47	10.26	19.36	9:14
10.96	21.20	14.45	10.02	19.38	9:15
10.89	21.23	14.44	9.95	19.40	9:16
10.91	21.42	14.44	9.96	19.56	9:17
<b>11.36</b>	<b>20.73</b>	<b>14.45</b>	<b>10.39</b>	<b>18.95</b>	<b>Averages</b>

CLIENT:  
PLANT:  
DATE:  
ENGINEER:

New Indy  
Oxnard, CA  
3/3/2020  
KK/JT

JOB#  
RUN#  
UNIT ID:  
RUN START:

220-017  
RATA 3  
Turbine  
9:18 AM

NOx, ppm	CO, ppm	O2, %	NOx, ppm @ 15% O2	CO, ppm @ 15% O2	Time
10.89	21.51	14.43	9.93	19.61	9:18
11.01	21.43	14.42	10.03	19.52	9:19
11.14	21.44	14.43	10.16	19.55	9:20
11.20	21.65	14.45	10.24	19.79	9:21
11.16	21.95	14.46	10.23	20.12	9:22
11.16	21.89	14.48	10.25	20.11	9:23
11.08	21.99	14.49	10.20	20.24	9:24
11.00	22.07	14.50	10.14	20.33	9:25
10.96	22.13	14.49	10.08	20.36	9:26
11.03	22.39	14.49	10.16	20.62	9:27
11.04	22.39	14.50	10.18	20.65	9:28
11.06	22.57	14.51	10.21	20.84	9:29
11.07	22.45	14.52	10.24	20.76	9:30
11.08	22.33	14.52	10.24	20.63	9:31
11.15	22.34	14.50	10.28	20.61	9:32
11.14	22.36	14.50	10.27	20.60	9:33
11.10	22.11	14.48	10.20	20.31	9:34
11.28	21.97	14.47	10.35	20.16	9:35
11.48	21.73	14.46	10.51	19.90	9:36
11.43	21.68	14.45	10.46	19.84	9:37
11.39	21.75	14.46	10.44	19.93	9:38
11.46	21.56	14.46	10.50	19.76	9:39
11.51	21.74	14.47	10.57	19.96	9:40
11.49	21.81	14.48	10.56	20.05	9:41
11.42	21.98	14.49	10.50	20.22	9:42
11.44	21.93	14.49	10.54	20.20	9:43
11.47	21.83	14.49	10.56	20.10	9:44
11.57	21.99	14.48	10.64	20.22	9:45
11.46	22.15	14.51	10.58	20.45	9:46
11.41	22.14	14.51	10.54	20.45	9:47
11.34	22.19	14.52	10.49	20.53	9:48
11.28	22.14	14.52	10.43	20.48	9:49
11.33	21.51	15.72	14.65	27.34	9:50
<b>11.24</b>	<b>21.97</b>	<b>14.52</b>	<b>10.47</b>	<b>20.43</b>	<b>Averages</b>

CLIENT:	New Indy	JOB#	220-017
PLANT:	Oxnard, CA	RUN#	RATA 4
DATE:	3/3/2020	UNIT ID:	Turbine
ENGINEER:	KK/JT	RUN START:	10:00 AM

NOx, ppm	CO, ppm	O2, %	NOx, ppm (@ 15% O2	CO, ppm (@ 15% O2	TIME
11.55	19.04	14.54	10.71	17.65	10:00
11.92	21.41	14.48	10.96	19.68	10:01
11.96	21.68	14.48	11.00	19.94	10:02
11.76	21.93	14.49	10.82	20.18	10:03
11.60	21.81	14.50	10.69	20.11	10:04
11.54	21.73	14.51	10.65	20.06	10:05
11.49	21.70	14.51	10.61	20.05	10:06
11.41	21.84	14.51	10.54	20.18	10:07
11.30	21.98	14.51	10.43	20.28	10:08
11.04	22.05	14.49	10.17	20.31	10:09
10.84	22.11	14.48	9.96	20.31	10:10
10.57	22.38	14.48	9.71	20.56	10:11
10.31	22.34	14.47	9.47	20.50	10:12
10.31	22.23	14.46	9.45	20.37	10:13
10.39	22.21	14.45	9.50	20.30	10:14
10.43	22.04	14.42	9.50	20.08	10:15
10.66	21.99	14.41	9.69	19.99	10:16
10.99	22.02	14.41	10.00	20.03	10:17
11.03	22.20	14.42	10.04	20.23	10:18
10.93	22.36	14.44	9.98	20.40	10:19
10.99	22.52	14.45	10.05	20.60	10:20
11.15	22.72	14.46	10.21	20.80	10:21
11.09	23.04	14.45	10.16	21.09	10:22
11.02	23.26	14.48	10.12	21.37	10:23
11.10	23.10	14.48	10.21	21.25	10:24
11.11	23.30	14.49	10.22	21.44	10:25
11.00	23.19	14.49	10.14	21.36	10:26
10.98	22.98	14.49	10.11	21.16	10:27
11.08	23.10	14.49	10.20	21.28	10:28
11.09	23.02	14.48	10.20	21.17	10:29
11.11	22.92	14.46	10.18	21.01	10:30
11.12	23.07	14.46	10.18	21.12	10:31
11.10	23.02	14.46	10.17	21.08	10:32
<b>11.09</b>	<b>22.31</b>	<b>14.47</b>	<b>10.18</b>	<b>20.48</b>	<b>Averages</b>

CLIENT:	New Indy	JOB#	220-017
PLANT:	Oxnard, CA	RUN#	RATA 5
DATE:	3/3/2020	UNIT ID:	Turbine
ENGINEER:	KK/JT	RUN START:	10:33 AM

NOx, ppm	CO, ppm	O2, %	NOx, ppm @ 15% O2	CO, ppm @ 15% O2	TIME
11.27	22.80	14.44	10.29	20.81	10:33
11.43	22.86	14.44	10.44	20.88	10:34
11.43	22.78	14.44	10.44	20.80	10:35
11.47	22.73	14.45	10.50	20.80	10:36
11.57	22.90	14.46	10.60	20.97	10:37
11.47	23.08	14.47	10.52	21.16	10:38
11.48	23.13	14.48	10.55	21.25	10:39
11.36	23.32	14.49	10.46	21.46	10:40
11.28	23.27	14.49	10.37	21.41	10:41
11.25	23.36	14.50	10.38	21.55	10:42
11.18	23.53	14.50	10.31	21.70	10:43
11.08	23.72	14.51	10.22	21.90	10:44
11.02	23.52	14.51	10.17	21.71	10:45
11.11	23.54	14.50	10.24	21.72	10:46
11.18	23.61	14.50	10.30	21.75	10:47
11.23	23.46	14.49	10.35	21.61	10:48
11.38	23.29	14.48	10.47	21.42	10:49
11.51	23.03	14.47	10.56	21.13	10:50
11.39	23.12	14.46	10.43	21.17	10:51
11.30	22.99	14.45	10.34	21.03	10:52
11.43	22.94	14.43	10.43	20.93	10:53
11.54	23.27	14.45	10.55	21.28	10:54
11.46	23.23	14.45	10.49	21.26	10:55
11.35	23.44	14.46	10.41	21.49	10:56
11.25	23.68	14.49	10.35	21.79	10:57
11.30	23.58	14.49	10.40	21.70	10:58
11.45	23.73	14.50	10.55	21.87	10:59
11.38	23.60	14.51	10.51	21.79	11:00
11.32	23.70	14.51	10.45	21.89	11:01
11.39	23.81	14.51	10.53	22.00	11:02
11.36	23.74	14.52	10.50	21.94	11:03
11.46	23.71	14.52	10.59	21.92	11:04
11.64	23.76	14.52	10.77	21.98	11:05
<b>11.36</b>	<b>23.34</b>	<b>14.48</b>	<b>10.44</b>	<b>21.46</b>	<b>Averages</b>

CLIENT:	New Indy	JOB#	220-017
PLANT:	Oxnard, CA	RUN#	RATA 6
DATE:	3/3/2020	UNIT ID:	Turbine
ENGINEER:	KK/JT	RUN START:	11:06 AM

NOx, ppm	CO, ppm	O2, %	NOx, ppm @ 15% O2	CO, ppm @ 15% O2	TIME
11.64	23.76	14.52	10.77	21.98	11:06
11.68	23.72	14.52	10.80	21.94	11:07
11.57	23.62	14.52	10.69	21.83	11:08
11.54	23.61	14.51	10.66	21.79	11:09
11.54	23.57	14.5	10.64	21.74	11:10
11.54	23.46	14.49	10.63	21.6	11:11
11.43	23.55	14.48	10.51	21.65	11:12
11.38	23.39	14.48	10.46	21.49	11:13
11.59	23.14	14.48	10.65	21.26	11:14
11.68	23.11	14.48	10.73	21.23	11:15
11.61	23.18	14.48	10.67	21.31	11:16
11.66	23.26	14.49	10.74	21.42	11:17
11.59	23.33	14.5	10.68	21.51	11:18
11.46	23.35	14.5	10.57	21.54	11:19
11.42	23.48	14.51	10.54	21.68	11:20
11.43	23.54	14.51	10.56	21.74	11:21
11.45	23.53	14.52	10.59	21.76	11:22
11.44	23.73	14.51	10.56	21.9	11:23
11.49	23.71	14.51	10.62	21.9	11:24
11.52	23.54	14.52	10.64	21.75	11:25
11.51	23.63	14.52	10.64	21.83	11:26
11.48	23.62	14.52	10.61	21.84	11:27
11.48	23.5	14.51	10.60	21.71	11:28
11.52	23.48	14.5	10.63	21.66	11:29
11.53	23.37	14.49	10.62	21.52	11:30
11.5	23.29	14.48	10.57	21.4	11:31
11.61	23.18	14.47	10.66	21.28	11:32
11.58	23.05	14.47	10.62	21.16	11:33
11.53	23.05	14.47	10.58	21.15	11:34
11.61	23.02	14.48	10.67	21.16	11:35
11.68	22.97	14.49	10.74	21.13	11:36
11.61	23.07	14.49	10.68	21.23	11:37
11.5	23.12	14.49	10.58	21.27	11:38
<b>11.54</b>	<b>23.39</b>	<b>14.50</b>	<b>10.63</b>	<b>21.56</b>	<b>Averages</b>



CLIENT:	New Indy	JOB#	220-017
PLANT:	Oxnard, CA	RUN#	RATA 7
DATE:	3/3/2020	UNIT ID:	Turbine
ENGINEER:	KK/JT	RUN START:	12:00 PM

NOx, ppm	CO, ppm	O2, %	NOx, ppm (@ 15% O2	CO, ppm (@ 15% O2	TIME
11.25	23.46	14.51	10.40	21.68	12:00
11.59	23.54	14.52	10.72	21.77	12:01
11.77	23.52	14.53	10.90	21.78	12:02
11.68	23.65	14.53	10.81	21.90	12:03
11.51	23.64	14.51	10.63	21.84	12:04
11.44	23.68	14.52	10.59	21.91	12:05
11.39	23.82	14.53	10.54	22.05	12:06
11.35	23.82	14.52	10.49	22.03	12:07
11.28	23.75	14.53	10.44	21.99	12:08
11.27	23.60	14.52	10.42	21.83	12:09
11.29	23.63	14.51	10.44	21.83	12:10
11.39	23.45	14.50	10.50	21.63	12:11
11.54	23.27	14.48	10.60	21.39	12:12
11.68	23.25	14.47	10.72	21.35	12:13
11.66	23.20	14.46	10.69	21.25	12:14
11.58	23.21	14.45	10.59	21.24	12:15
11.55	23.16	14.46	10.57	21.21	12:16
11.40	23.18	14.46	10.44	21.24	12:17
11.29	23.37	14.47	10.36	21.43	12:18
11.28	23.40	14.47	10.35	21.49	12:19
11.38	23.66	14.47	10.44	21.70	12:20
11.46	23.65	14.47	10.52	21.70	12:21
11.44	23.60	14.49	10.52	21.71	12:22
11.51	23.65	14.49	10.60	21.79	12:23
11.45	23.82	14.51	10.57	21.99	12:24
11.37	23.65	14.50	10.49	21.82	12:25
11.29	23.76	14.51	10.42	21.93	12:26
11.24	23.81	14.52	10.39	22.01	12:27
11.24	23.82	14.51	10.38	22.00	12:28
11.30	23.69	14.51	10.44	21.89	12:29
11.36	23.47	14.51	10.49	21.67	12:30
11.39	23.37	14.50	10.50	21.54	12:31
11.32	23.34	14.49	10.42	21.49	12:32
<b>11.42</b>	<b>23.54</b>	<b>14.50</b>	<b>10.53</b>	<b>21.70</b>	<b>Averages</b>

CLIENT:	New Indy	JOB#	220-017
PLANT:	Oxnard, CA	RUN#	RATA 8
DATE:	3/3/2020	UNIT ID:	Turbine
ENGINEER:	KK/JT	RUN START:	12:33 PM

NOx, ppm	CO, ppm	O2, %	NOx, ppm @ 15% O2	CO, ppm @ 15% O2	TIME
11.24	23.24	14.48	10.32	21.34	12:33
11.27	23.25	14.48	10.36	21.36	12:34
11.28	23.06	14.46	10.34	21.13	12:35
11.33	23.08	14.45	10.36	21.11	12:36
11.30	23.07	14.44	10.33	21.09	12:37
11.24	23.15	14.44	10.27	21.15	12:38
11.25	23.15	14.44	10.27	21.13	12:39
11.20	23.27	14.46	10.26	21.31	12:40
11.13	23.31	14.47	10.21	21.38	12:41
11.01	23.51	14.48	10.11	21.59	12:42
11.10	23.68	14.49	10.21	21.78	12:43
11.14	23.62	14.50	10.26	21.75	12:44
11.05	23.66	14.50	10.19	21.82	12:45
10.94	23.59	14.50	10.09	21.75	12:46
10.97	23.78	14.51	10.13	21.95	12:47
10.95	23.86	14.52	10.12	22.05	12:48
11.01	23.67	14.51	10.18	21.87	12:49
11.03	23.68	14.51	10.18	21.85	12:50
10.92	23.66	14.49	10.05	21.78	12:51
10.90	23.53	14.47	10.00	21.58	12:52
11.02	23.31	14.45	10.09	21.33	12:53
11.10	23.10	14.42	10.11	21.04	12:54
11.13	23.03	14.40	10.10	20.90	12:55
11.00	22.84	14.39	9.96	20.70	12:56
10.92	22.75	14.39	9.90	20.62	12:57
11.03	22.84	14.40	10.01	20.72	12:58
11.16	22.96	14.41	10.15	20.88	12:59
11.32	23.13	14.42	10.31	21.06	13:00
11.52	23.29	14.44	10.52	21.26	13:01
11.45	23.38	14.45	10.47	21.39	13:02
11.33	23.56	14.46	10.38	21.58	13:03
11.19	23.64	14.47	10.27	21.70	13:04
11.09	23.72	14.48	10.18	21.79	13:05
<b>11.14</b>	<b>23.34</b>	<b>14.46</b>	<b>10.20</b>	<b>21.39</b>	<b>Averages</b>

CLIENT:	New Indy	JOB#	220-017
PLANT:	Oxnard, CA	RUN#	RATA 9
DATE:	3/3/2020	UNIT ID:	Turbine
ENGINEER:	KK/JT	RUN START:	1:06 PM

NOx, ppm	CO, ppm	O2, %	NOx, ppm (@ 15% O2	CO, ppm (@ 15% O2	TIME
11.09	23.72	14.48	10.18	21.79	13:06
11.05	23.95	14.48	10.16	22.01	13:07
11.08	23.95	14.48	10.18	22.01	13:08
11.07	23.77	14.47	10.17	21.82	13:09
11.14	23.73	14.46	10.21	21.75	13:10
11.14	23.73	14.45	10.20	21.72	13:11
11.09	23.60	14.45	10.14	21.59	13:12
11.13	23.39	14.43	10.14	21.31	13:13
11.25	23.18	14.41	10.24	21.08	13:14
11.31	22.94	14.38	10.24	20.77	13:15
11.31	22.61	14.35	10.19	20.38	13:16
11.33	22.14	14.32	10.17	19.87	13:17
11.36	21.80	14.29	10.14	19.46	13:18
11.43	21.71	14.27	10.18	19.32	13:19
11.55	21.68	14.29	10.31	19.34	13:20
11.63	21.87	14.31	10.41	19.57	13:21
11.73	22.07	14.32	10.52	19.80	13:22
11.79	22.36	14.35	10.63	20.16	13:23
11.69	22.54	14.38	10.57	20.38	13:24
11.44	22.77	14.39	10.38	20.65	13:25
11.19	23.07	14.41	10.18	20.99	13:26
11.02	23.22	14.42	10.04	21.15	13:27
10.92	23.29	14.42	9.95	21.21	13:28
10.95	23.29	14.43	9.98	21.24	13:29
10.86	23.41	14.44	9.92	21.38	13:30
10.78	23.40	14.45	9.86	21.40	13:31
10.68	23.56	14.45	9.77	21.57	13:32
10.66	23.75	14.46	9.76	21.74	13:33
10.73	23.78	14.45	9.81	21.75	13:34
10.78	23.77	14.44	9.85	21.71	13:35
10.77	23.79	14.44	9.84	21.73	13:36
10.74	23.85	14.44	9.82	21.79	13:37
10.71	23.61	14.43	9.77	21.54	13:38
<b>11.1</b>	<b>23.1</b>	<b>14.4</b>	<b>10.1</b>	<b>21.0</b>	<b>Averages</b>

New  
ending  
11.0-17  
3-3-10 with  
look for

Nov 0.25  
CG 0.100  
02.0-25

Bias

Initial Bias cal

40  
CG

Nov 12.11  
Nov 12.18

40  
CG  
CC271657

Nov 12.11  
12.16

40  
CG  
E50010337

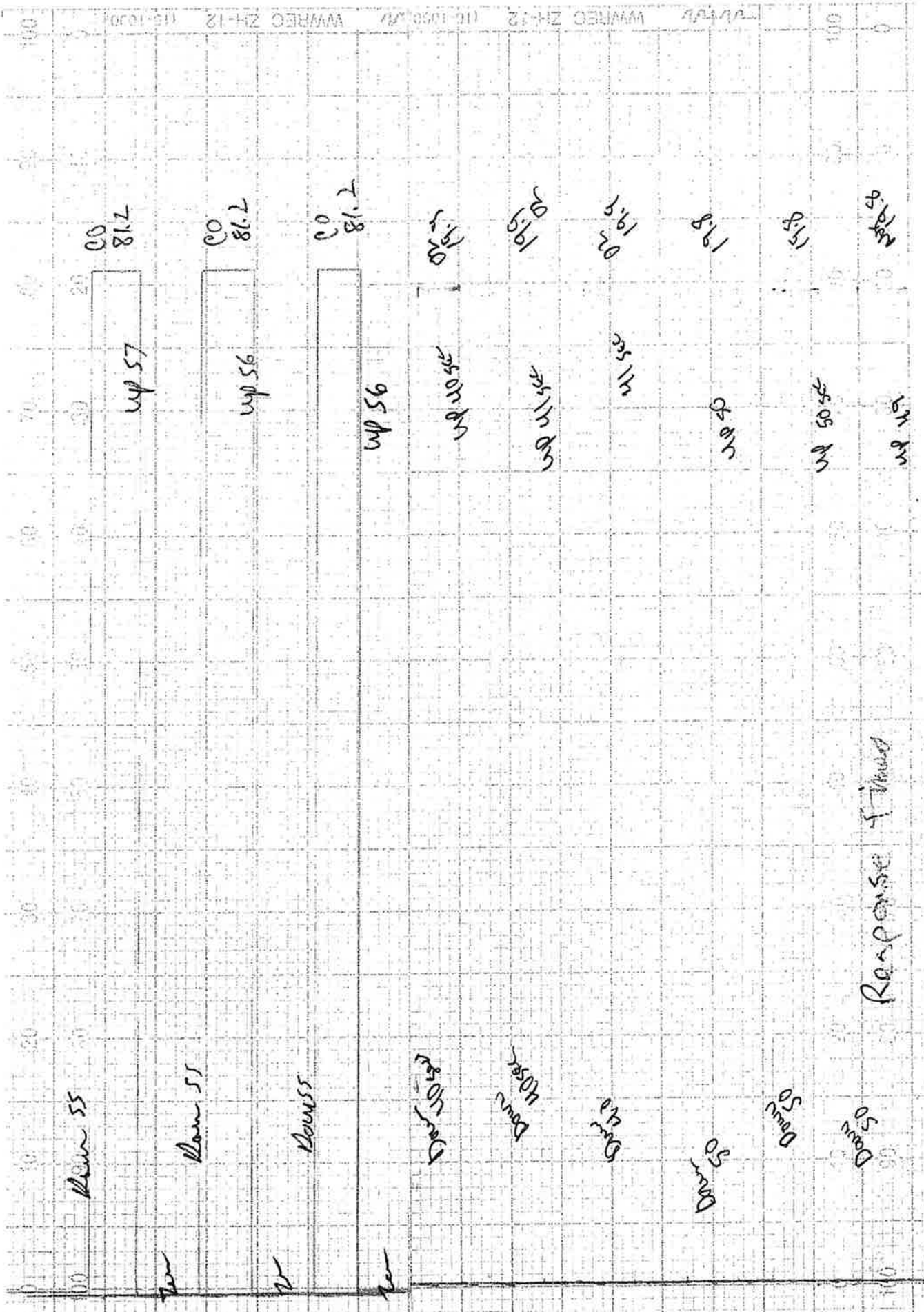
Nov 12.18  
12.16

Nov 12.18  
CG214150  
AB2 → NO  
CONSUME

Nov 12.18  
CG21737

Nov 12.18  
CG214145

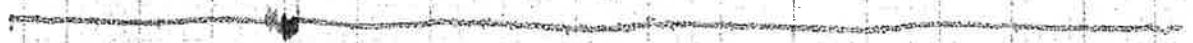
Initial Interval Linearity cal



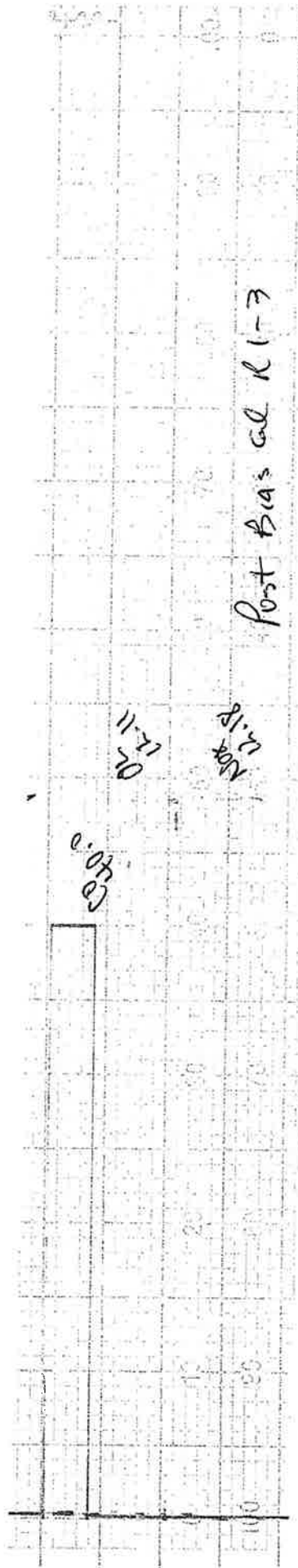
Response Time

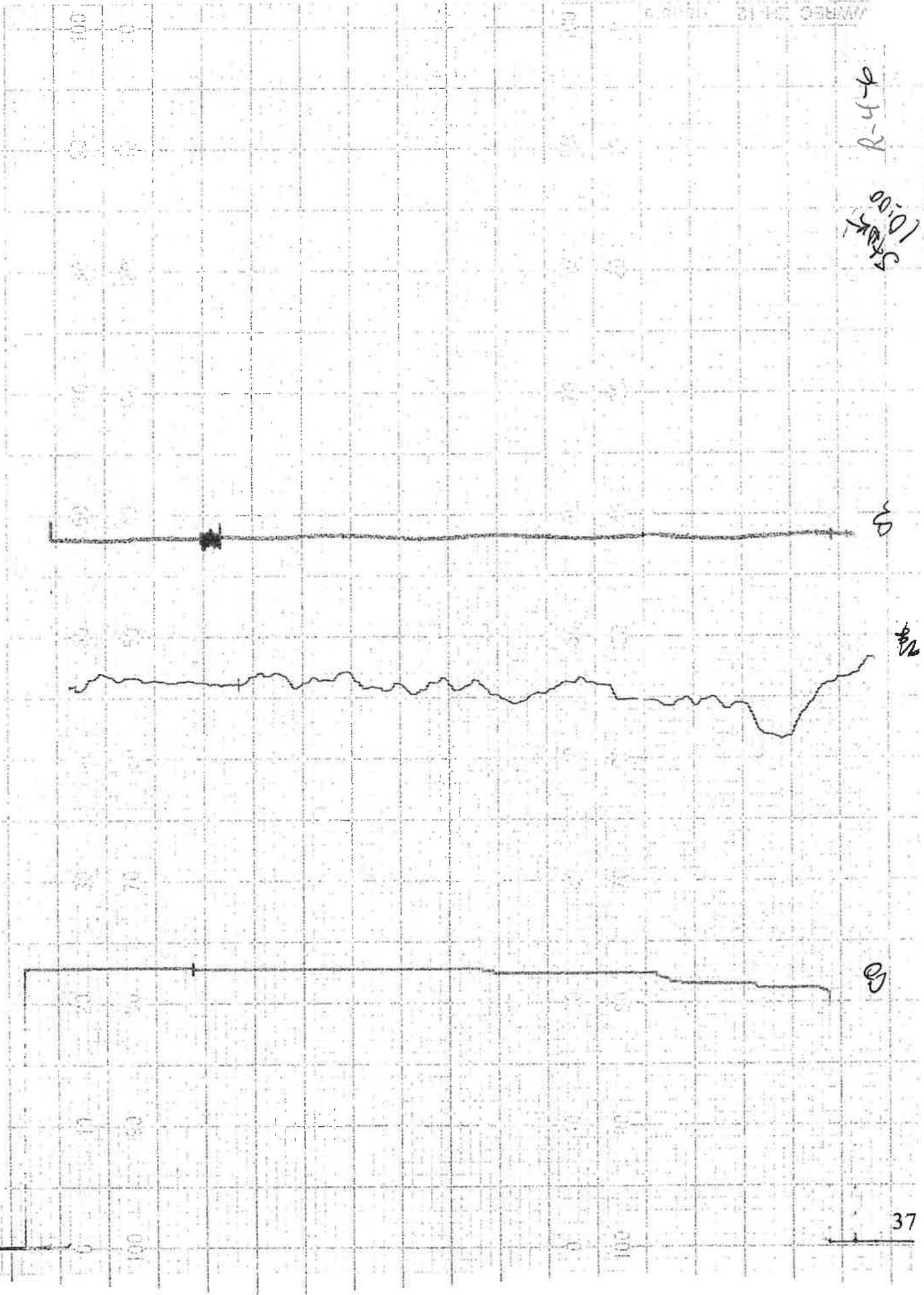
2/16/63  
R-1 → 3

End  
Dir

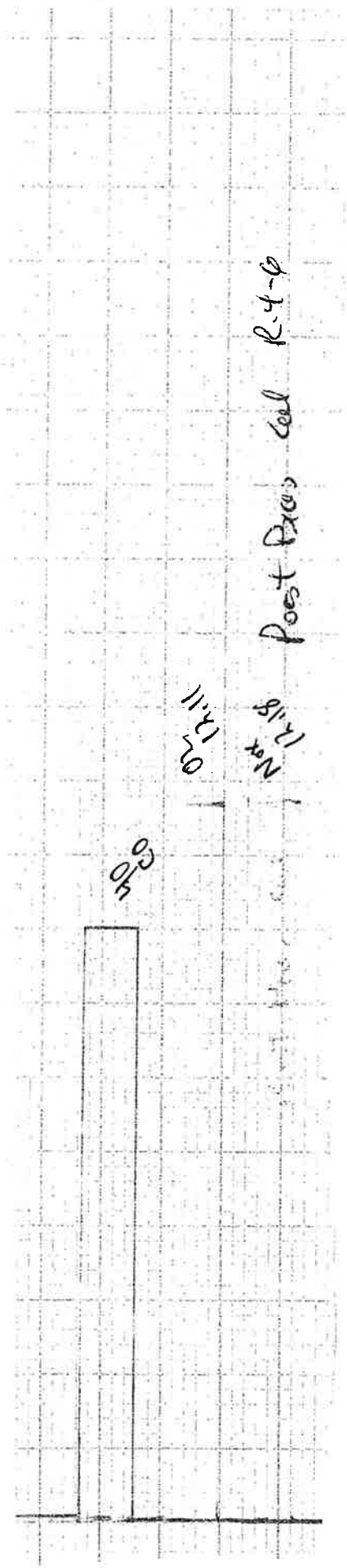


35

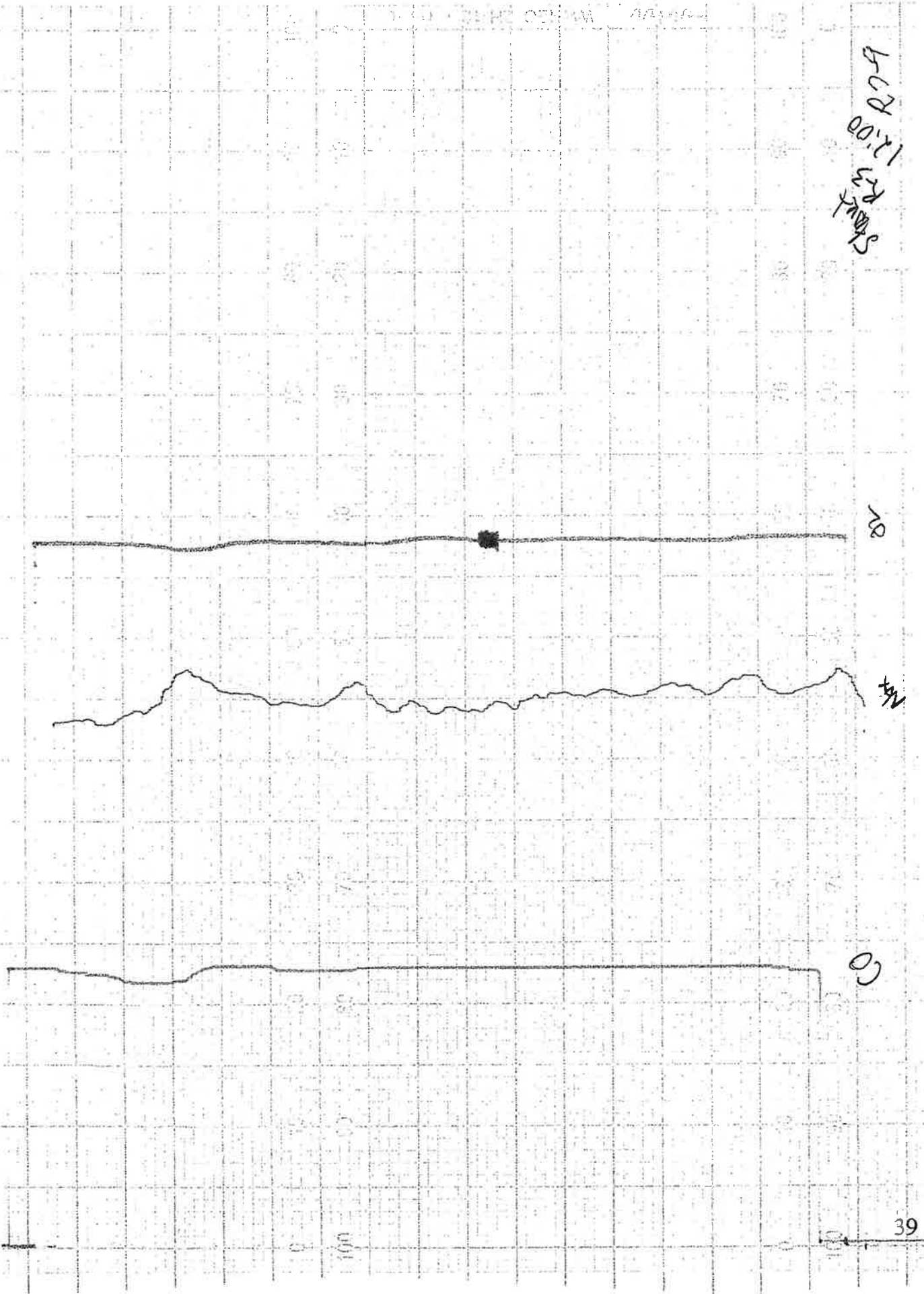


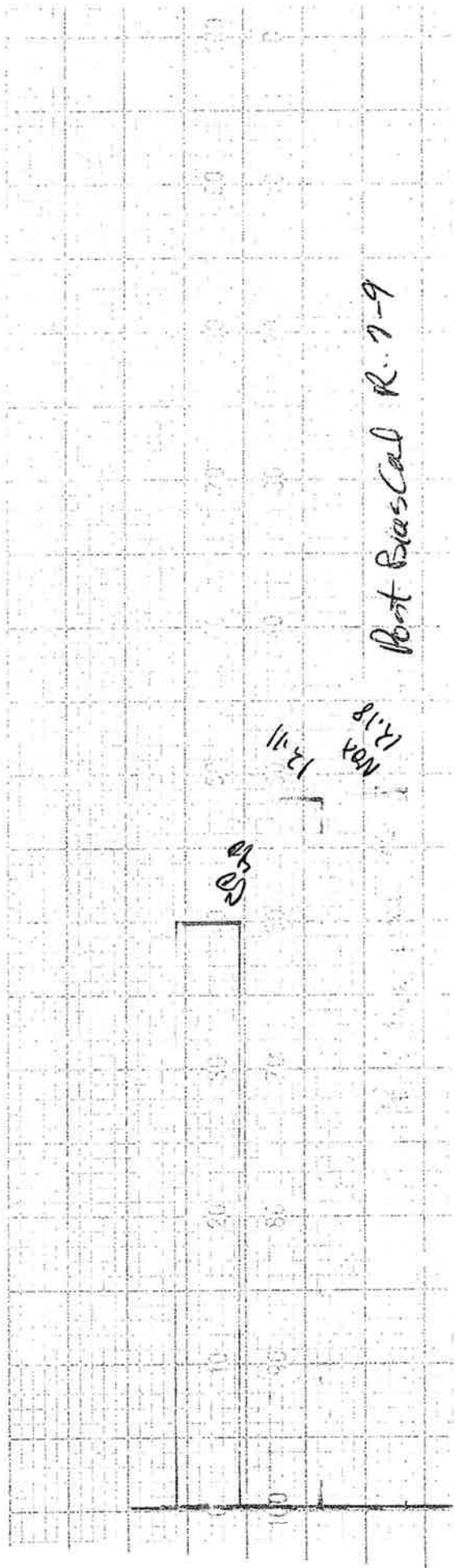






SLACK RY3  
12:00  
ALTA RY9



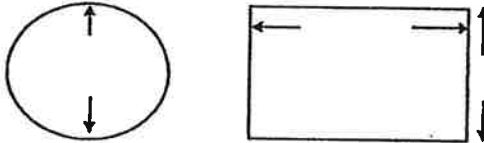


# AIR TESTING

Plant: <u>AKW ENCLY</u>	Amb. Temp: <u>50</u>	Nozzle: <u>318</u>
Location: <u>OxNHAD</u>	Pbar: <u>29.97</u>	Prob Heat: <u>-</u>
Unit: <u>tenchime</u>	Pitot: <u>-</u>	Wind Vel: <u>calm</u>
Date: <u>3-3-20</u>	Pyro: <u>-</u>	Static Press: <u>-</u>
Run #: <u>1-2-3</u>	Mag Δ P: <u>-</u>	O2: <u>21.5</u>
Cold Box: <u>-</u>	Mag Δ H: <u>AKW ENCLY</u>	CO2: <u>-</u>
Meter #: <u>J</u>	% H2O: <u>-</u>	Engineer: <u>KK</u>
Meter Factor: <u>1.0108</u>	Box Heat: <u>-</u>	Technician: <u>ET</u>

Stack Dia.: \_\_\_\_\_  
 "A": \_\_\_\_\_  
 "B": \_\_\_\_\_  
 Port Size: \_\_\_\_\_  
 Offset: \_\_\_\_\_  
 M/F: \_\_\_\_\_

Stack Sample Port Location



Imp.	Gross	Tare	Total
1		611.6	
2		595.5	
3		551.7	
4		103.9	

Filter 1: \_\_\_\_\_  
 Filter 2: \_\_\_\_\_

START TIME: 8:12 END TIME: 9:42

"K" FACTOR: \_\_\_\_\_

Point No.	Traverse Distance	Time Minutes	Stack °F	Δ P	√Δ P	Dry Gas Meter Volume	Δ H In H2O	Inlet °F	Outlet °F	Impinger Exit °F	Meter Vacuum	Filter Temp. °F	Probe Temp. °F	Cyl. Flow
		0				897.670	1.75	63	61		4			
		10				905.6	1.75	65	60		4			
		20				912.8	1.75	67	61		4			
		30				920.0	1.75	68	63		4			
		40				927.2	1.75	69	64		4			
		50				934.4	1.75	70	64		4			
		60				941.6	1.75	71	65		4			
		70				948.8	1.75	71	67		4			
		80				956.0	1.75	72	68		4			
		90				963.2	1.75	73	69		4			
		96				967.257								

Average: 96 | 69.587 | 1.75 | 66.6 | 90

Leak Checks: Pitots

Pre	Top	Bottom
ΔP		

Post	Top	Bottom
ΔP		

Sample Train Leak Check

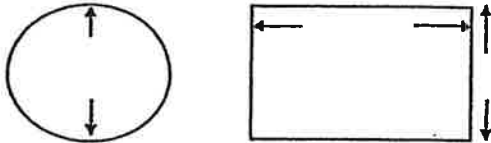
CFM:	<u>1.002</u>	In. HG:	<u>17</u>
CFM:	<u>1.002</u>	In. HG:	<u>15</u>

# AIR TESTING

Plant: <u>NEW India</u>	Amb. Temp: <u>70</u>	Nozzle: <u>318</u>
Location: <u>Chennai</u>	Pbar: <u>29.99</u>	Prob Heat: <u>-</u>
Unit: <u>Turbine</u>	Pitot: <u>-</u>	Wind Vel: <u>Calm</u>
Date: <u>3-3-2020</u>	Pyro: <u>-</u>	Static Press: <u>-</u>
Run #: <u>21-5-6</u>	Mag Δ P: <u>-</u>	O2: <u>14.5</u>
Cold Box: <u>5</u>	Mag Δ H: <u>116.210</u>	CO2: <u>-</u>
Meter #: <u>5</u>	% H2O: <u>-</u>	Engineer: <u>KK</u>
Meter Factor: <u>1.0108</u>	Box Heat: <u>-</u>	Technician: <u>KT</u>

Stack Dia.: \_\_\_\_\_  
 "A": \_\_\_\_\_  
 "B": \_\_\_\_\_  
 Port Size: \_\_\_\_\_  
 Offset: \_\_\_\_\_  
 M/F: \_\_\_\_\_

Stack Sample Port Location



Imp.	Gross	Tare	Total
1		647.0	
2		584.2	
3		477.3	
4		641.3	

Filter 1: \_\_\_\_\_

Filter 2: \_\_\_\_\_

START TIME: 10:00 END TIME: 11:36

"K" FACTOR: \_\_\_\_\_

Point No.	Traverse Distance	Time Minutes	Stack °F	Δ P	√Δ P	Dry Gas Meter Volume	Δ H In H2O	Inlet °F	Outlet °F	Impinger Ext. °F	Meter Vacuum	Filter Temp. °F	Probe Temp. °F	Cyl. Flow
		0				968.337	1.75	71	69		5			
		10				975.5	1.75	74	69		5			
		20				982.7	1.75	74	70		5			
		30				989.9	1.75	75	71		5			
		40				997.1	1.75	75	71		5			
		50				1004.3	1.75	75	71		5			
		60				1011.5	1.75	76	71		5			
		70				1018.7	1.75	76	71		5			
		80				1025.9	1.75	76	71		5			
		90				1033.1	1.75	76	71		5			
		96				1040.359								

Average: 96 | 92.022 | 1.75 | 92.7 | 95.0

Leak Checks : Pitots

Sample Train Leak Check

Pre ΔP	Top	Bottom
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Post ΔP	Top	Bottom
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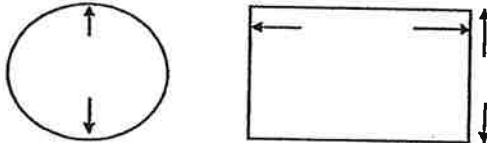
CFM: <u>1.001</u>	In. HG: <u>15</u>
CFM: <u>1.001</u>	In. HG: <u>14</u>



Plant: <u>New Tully</u>	Amb. Temp: <u>72</u>	Nozzle: <u>316</u>
Location: <u>Danwood</u>	Pbar: <u>29.97</u>	Prob Heat: <u>-</u>
Unit: <u>Texture</u>	Pitot: <u>-</u>	Wind Vel: <u>0.5</u>
Date: <u>3-3-20</u>	Pyro: <u>-</u>	Static Press: <u>-</u>
Run #: <u>7-8-9</u>	Mag Δ P: <u>-</u>	O2: <u>18.5</u>
Cold Box: <u>3</u>	Mag Δ H: <u>41.600</u>	CO2: <u>-</u>
Meter #: <u>J</u>	% H2O: <u>-</u>	Engineer: <u>KE</u>
Meter Factor: <u>1.0108</u>	Box Heat: <u>-</u>	Technician: <u>ET</u>

Stack Dia.: \_\_\_\_\_  
 "A": \_\_\_\_\_  
 "B": \_\_\_\_\_  
 Port Size: \_\_\_\_\_  
 Offset: \_\_\_\_\_  
 M/F: \_\_\_\_\_

Stack Sample Port Location



Imp.	Gross	Tare	Total
1			
2			
3			
4			

Filter 1: \_\_\_\_\_

Filter 2: \_\_\_\_\_

START TIME: 12:00 END TIME: 13:06

"K" FACTOR: \_\_\_\_\_

Point No.	Traverse Distance	Time Minutes	Stack °F	Δ P	√Δ P	Dry Gas Meter Volume	Δ H In H2O	Inlet ° F	Outlet ° F	Impinger Exit ° F	Meter Vacuum	Filter Temp. ° F	Probe Temp. ° F	Cyl. Flow
		0				41.608	1.75	75	74		4			
		10				48.8	1.75	77	74		4			
		20				56.0	1.75	78	74		4			
		30				63.2	1.75	78	75		4			
		40				70.5	1.75	79	75		4			
		50				77.7	1.75	80	75		4			
		60				84.9	1.75	80	76		4			
		70				92.1	1.75	81	76		4			
		80				99.3	1.75	81	76		4			
		90				106.5	1.75	81	77		4			
		96				113.753								

Average: 96 | 72.145 | 1.75 | 77.1 | 4.0

Leak Checks: Pitots

Sample Train Leak Check

Pre ΔP	Top	Bottom
--------	-----	--------

Post ΔP	Top	Bottom
---------	-----	--------

CFM: <u>.002</u>	In. HG: <u>17</u>
CFM: <u>.002</u>	In. HG: <u>14</u>

R-1

New-Indy Oxnard, LLC  
ROSEMOUNT CEMS SOURCE TEST - March 3, 2020

3/3/2020 5:17 3/3/2020 5:45 AM 1 m

Stack NOx	Stack CO	Stack O2	Duct Burner Gas Flow	Turbine Gas Flow	Steam Injection	Ammonia Injection	Turbine Load
RE_31AC1151C.CO	RS_31AC1119C.O2	0968AFLOWL_A	6TASFLOW	921-2016.WQ	931FC1173_MV	921-2016.DWATT	
03-Mar-20 08:12:00	19.53	14.05	23.58	260.35	2.47	24.78	24.90
03-Mar-20 08:13:00	19.45	14.02	24.56	266.35	2.47	25.12	24.91
03-Mar-20 08:14:00	19.33	13.98	25.13	266.35	2.45	25.24	24.78
03-Mar-20 08:15:00	19.33	13.97	25.16	266.35	2.44	25.25	24.77
03-Mar-20 08:16:00	19.35	13.98	24.54	268.35	2.44	25.50	24.77
03-Mar-20 08:17:00	19.37	13.98	23.03	265.27	2.44	25.59	24.80
03-Mar-20 08:18:00	19.49	14.02	22.23	265.35	2.44	25.65	24.60
03-Mar-20 08:19:00	19.44	14.01	22.36	262.72	2.44	25.71	24.88
03-Mar-20 08:20:00	19.40	14.02	22.90	262.51	2.44	25.66	24.83
03-Mar-20 08:21:00	19.53	14.05	23.87	264.85	2.44	25.84	24.81
03-Mar-20 08:22:00	19.57	14.04	23.11	266.34	2.44	25.91	24.75
03-Mar-20 08:23:00	19.67	14.09	23.01	266.35	2.44	25.86	24.78
03-Mar-20 08:24:00	19.50	14.03	22.43	266.35	2.44	25.83	24.94
03-Mar-20 08:25:00	19.47	14.02	22.94	266.35	2.46	26.14	24.82
03-Mar-20 08:26:00	19.43	14.01	22.33	266.35	2.46	26.12	24.89
03-Mar-20 08:27:00	19.42	14.01	21.68	266.35	2.46	26.11	24.84
03-Mar-20 08:28:00	19.65	14.09	21.20	269.35	2.41	26.18	24.81
03-Mar-20 08:29:00	19.60	14.07	20.87	268.35	2.39	26.15	24.69
03-Mar-20 08:30:00	19.54	14.05	21.20	266.35	2.44	26.27	24.73
03-Mar-20 08:31:00	19.44	14.02	22.05	266.35	2.46	26.38	24.80
03-Mar-20 08:32:00	19.42	14.01	22.84	269.35	2.45	26.63	24.84
03-Mar-20 08:33:00	19.51	14.04	23.54	269.35	2.45	26.56	24.82
03-Mar-20 08:34:00	19.25	13.95	24.10	266.35	2.47	26.62	24.83
03-Mar-20 08:35:00	19.80	13.98	24.47	269.35	2.48	26.62	24.84
03-Mar-20 08:36:00	19.49	13.98	24.35	266.35	2.45	26.62	24.78
03-Mar-20 08:37:00	19.54	14.01	23.59	266.35	2.48	26.82	24.77
03-Mar-20 08:38:00	19.48	13.98	23.49	266.35	2.47	26.77	24.77
03-Mar-20 08:39:00	19.45	13.98	24.33	266.35	2.46	26.60	24.79
03-Mar-20 08:40:00	19.04	14.02	24.48	266.35	2.46	26.50	24.77
03-Mar-20 08:41:00	19.54	14.02	23.68	266.35	2.45	26.98	24.75
03-Mar-20 08:42:00	19.21	14.07	22.85	268.35	2.49	26.91	24.77
03-Mar-20 08:43:00	10.86	14.06	23.32	268.35	2.46	26.91	24.81
03-Mar-20 08:44:00	10.82	14.10	22.08	268.35	2.45	26.88	24.86
<b>Average Stack NOx, ppm (15% O2)</b>	<b>19.31</b>	<b>14.02</b>	<b>Average Duct Burner Gas Flow (MSCFH)</b>	<b>Average Turbine Gas Flow (MSCFH)</b>	<b>Ave. Steam Injection Rate (lbs)</b>	<b>Ave. Ammonia Injection (lb/hr)</b>	<b>Ave. Turbine Load (MWh)</b>
	19.31	14.02	23.10	266.04	2.45	26.16	24.82

289.23 \* 1000 / 60 = 4820.5 cfm

New-Indy Oxnard, LLC  
ROSEMOUNT CEMS SOURCE TEST - March 3, 2020

R-2

Stack NOx	Stack CO	Stack O2	Duct Burner Gas Flow	Turbine Gas Flow	Steam Injection	Ammonia Injection	Turbine Load
10.76	19.75	14.09	22.26	266.35	2.47	27.10	24.91
10.78	19.71	14.07	21.85	266.35	2.46	27.02	24.90
10.86	19.72	14.07	20.65	266.35	2.46	27.02	24.87
10.80	19.70	14.07	20.31	266.35	2.45	26.97	24.83
10.47	19.73	14.08	20.52	266.35	2.49	27.04	24.89
10.36	19.70	14.07	20.29	266.35	2.46	27.00	24.84
10.56	19.76	14.09	19.47	266.35	2.48	27.21	24.66
10.55	19.76	14.09	19.85	266.35	2.39	27.09	24.16
10.27	19.44	14.05	18.87	259.09	2.48	26.99	24.66
10.09	18.76	14.07	19.11	259.27	2.46	27.20	24.53
10.07	18.72	14.08	19.78	263.36	2.52	27.05	24.59
10.15	18.59	14.01	20.60	269.33	2.46	27.18	25.01
10.37	18.54	13.99	21.63	268.35	2.46	27.20	24.69
10.82	18.49	14.02	22.24	266.35	2.45	27.31	24.88
10.93	18.61	14.02	22.26	266.35	2.46	27.52	24.80
10.85	18.63	14.02	22.62	266.35	2.47	27.49	24.89
10.58	18.74	14.06	23.39	266.35	2.46	27.50	24.63
10.48	18.83	14.04	23.52	266.35	2.47	27.48	24.77
10.74	18.26	14.10	22.79	268.35	2.47	27.44	24.80
10.71	18.45	14.07	21.86	266.35	2.42	27.57	24.60
10.30	18.82	14.09	20.66	266.35	2.40	27.60	24.72
10.19	18.84	14.10	20.02	266.35	2.39	27.46	24.74
10.48	18.35	14.10	20.12	266.35	2.44	27.30	24.66
18.61	18.88	14.09	20.08	266.35	2.46	27.39	24.78
18.28	18.28	14.09	19.79	266.35	2.47	27.35	24.72
18.92	18.99	14.14	19.74	266.35	2.49	27.32	24.73
18.65	19.72	14.06	20.10	266.35	2.48	27.24	24.64
10.54	18.80	14.08	20.74	266.35	2.48	27.15	24.65
10.04	19.71	14.05	21.78	266.35	2.47	27.09	24.90
9.80	19.67	14.04	22.25	266.35	2.47	26.89	24.84
9.82	19.67	14.04	21.87	266.35	2.54	26.63	25.01
10.07	19.59	14.01	22.32	266.35	2.52	26.65	24.69
10.20	19.65	14.04	23.54	266.35	2.55	26.47	25.04
<b>Average Stack NOx, ppm (15% O2)</b>	<b>Average Stack CO, ppm (15% O2)</b>	<b>Average Stack O2 (%)</b>	<b>Average Duct Burner Gas Flow (MSCFH)</b>	<b>Average Turbine Gas Flow (MSCFH)</b>	<b>Avg. Steam Injection Rate (lbs)</b>	<b>Avg. Ammonia Injection (lb/hr)</b>	<b>Avg. Turbine Load (MW/h)</b>
10.45	19.36	14.06	21.10	265.73	2.47	27.19	24.85

286.83 \* 1000 / 60 = 4780.5 cfm



R-3

New-Indy Oxnard, LLC  
ROSEMOUNT CEMS SOURCE TEST - March 3, 2020

3/3/2020 1:19 03/03/2020 1:19

Stack NOx	Stack CO	Stack O2	Duct Burner Gas Flow	Turbine Gas Flow	Steam Injection	Ammonia Injection	Turbine Load
NOx ppm (15% O2)	CO ppm (15% O2)	Stack O2 (%)	08GASFLOW_A	STGASFLOW	921-2016.WQ	93FIC1173_MV	921-2016.DWATT
10.34	19.67	14.04	24.20	266.35	2.50	26.46	25.02
10.49	20.00	14.05	24.07	266.35	2.46	26.46	24.91
10.48	20.76	14.11	23.52	266.35	2.51	26.54	24.87
10.28	20.76	14.11	22.41	266.35	2.53	26.47	24.93
10.18	20.70	14.12	21.60	266.35	2.55	26.23	24.87
10.22	20.84	14.13	21.87	266.35	2.54	26.12	25.05
10.30	20.72	14.09	21.83	266.35	2.53	25.94	25.03
10.42	20.72	14.09	21.64	266.35	2.54	25.86	25.05
10.43	20.63	14.06	21.60	266.35	2.52	25.85	24.98
10.29	20.78	14.11	22.47	266.35	2.53	25.80	24.90
10.22	20.78	14.11	22.48	266.35	2.53	25.71	24.93
10.27	20.65	14.14	21.81	266.35	2.55	25.72	25.00
10.28	20.60	14.12	20.78	266.35	2.52	25.71	24.97
10.29	20.71	14.06	20.05	266.35	2.54	25.66	25.00
10.38	20.68	14.08	20.37	266.35	2.52	25.67	24.89
10.58	20.75	14.10	22.14	266.35	2.54	25.68	24.89
10.71	20.02	14.05	23.96	266.35	2.54	25.75	24.87
10.72	19.81	14.04	25.83	266.35	2.49	25.68	24.80
10.75	20.52	14.03	26.01	266.35	2.46	25.90	24.88
10.80	20.67	14.09	26.91	266.35	2.47	25.99	24.87
10.78	20.65	14.08	22.87	266.35	2.49	26.02	24.85
10.68	20.65	14.06	23.35	266.35	2.47	25.99	24.90
10.55	20.69	14.09	23.25	266.35	2.45	25.85	24.87
10.38	20.41	14.10	22.34	266.35	2.46	25.99	24.88
10.38	19.85	14.10	21.42	267.42	2.54	26.02	25.06
10.62	20.27	14.07	20.50	269.88	2.51	25.83	24.84
10.75	20.61	14.07	20.27	270.38	2.53	25.78	25.02
10.73	20.71	14.11	20.99	267.84	2.54	25.82	24.84
10.65	20.78	14.13	21.34	266.96	2.47	25.82	24.82
10.47	20.71	14.11	21.19	266.35	2.49	25.86	24.89
10.25	20.79	14.13	21.12	268.35	2.48	25.85	24.94
10.10	20.74	14.12	21.15	268.35	2.48	25.85	24.86
10.02	20.76	14.12	21.08	268.35	2.50	25.84	24.92
<b>Average Stack NOx ppm (15% O2)</b>	<b>Average Stack CO ppm (15% O2)</b>	<b>Average Stack O2 (%)</b>	<b>Average Duct Burner Gas Flow (MSCFH)</b>	<b>Average Turbine Gas Flow (MSCFH)</b>	<b>Ave. Steam Injection Rate (lbs)</b>	<b>Ave. Ammonia Injection (lb/hr)</b>	<b>Ave. Turbine Load (MWth)</b>
10.45	20.67	14.09	22.23	266.66	2.51	25.90	24.84

Aug MWth = 24.42  
Avg MWth = 24.87

488.83 x 1000 / 60 = 4813.83 cfm

Average Runns 1-3

4804.94 cfm

R-4

New Indy Oxnard, LLC  
ROSEMOUNT CEMS SOURCE TEST - March 3, 2020

3/3/2020 10:23 1 m

Stack NOx	Stack CO	Stack O2	Duct Burner Gas Flow	Turbine Gas Flow	Steam Injection	Ammonia Injection	Turbine Load
RS_NOX_PPM	RG_3T1ACT111C.CCO	RG_3T1ACT111B.O2	PROGASFLOW_A	OT0ASFLOW	921-2016.WQ	931FICT171_AW	921-2015.DWATT
11.45	20.11	14.04	21.33	266.35	2.51	25.89	24.94
03-Mar-20 10:00:00	03-Mar-20 10:00:00	03-Mar-20 10:00:00	03-Mar-20 10:00:00	03-Mar-20 10:00:00	03-Mar-20 10:00:00	03-Mar-20 10:00:00	03-Mar-20 10:00:00
11.12	19.83	14.03	20.84	266.35	2.53	26.03	24.97
03-Mar-20 10:01:00	03-Mar-20 10:01:00	03-Mar-20 10:01:00	03-Mar-20 10:01:00	03-Mar-20 10:01:00	03-Mar-20 10:01:00	03-Mar-20 10:01:00	03-Mar-20 10:01:00
10.89	19.78	14.09	18.87	266.35	2.54	25.97	24.93
03-Mar-20 10:02:00	03-Mar-20 10:02:00	03-Mar-20 10:02:00	03-Mar-20 10:02:00	03-Mar-20 10:02:00	03-Mar-20 10:02:00	03-Mar-20 10:02:00	03-Mar-20 10:02:00
10.64	19.81	14.10	19.33	266.35	2.55	26.06	24.88
03-Mar-20 10:03:00	03-Mar-20 10:03:00	03-Mar-20 10:03:00	03-Mar-20 10:03:00	03-Mar-20 10:03:00	03-Mar-20 10:03:00	03-Mar-20 10:03:00	03-Mar-20 10:03:00
10.77	19.79	14.09	19.17	266.35	2.54	25.84	24.92
03-Mar-20 10:04:00	03-Mar-20 10:04:00	03-Mar-20 10:04:00	03-Mar-20 10:04:00	03-Mar-20 10:04:00	03-Mar-20 10:04:00	03-Mar-20 10:04:00	03-Mar-20 10:04:00
10.90	19.79	14.09	19.69	266.35	2.52	25.81	24.92
03-Mar-20 10:05:00	03-Mar-20 10:05:00	03-Mar-20 10:05:00	03-Mar-20 10:05:00	03-Mar-20 10:05:00	03-Mar-20 10:05:00	03-Mar-20 10:05:00	03-Mar-20 10:05:00
10.28	20.46	14.13	19.87	266.35	2.54	25.63	24.96
03-Mar-20 10:06:00	03-Mar-20 10:06:00	03-Mar-20 10:06:00	03-Mar-20 10:06:00	03-Mar-20 10:06:00	03-Mar-20 10:06:00	03-Mar-20 10:06:00	03-Mar-20 10:06:00
9.97	20.68	14.08	19.83	266.35	2.53	25.47	24.98
03-Mar-20 10:07:00	03-Mar-20 10:07:00	03-Mar-20 10:07:00	03-Mar-20 10:07:00	03-Mar-20 10:07:00	03-Mar-20 10:07:00	03-Mar-20 10:07:00	03-Mar-20 10:07:00
9.73	20.75	14.10	19.83	266.35	2.53	25.18	24.92
03-Mar-20 10:08:00	03-Mar-20 10:08:00	03-Mar-20 10:08:00	03-Mar-20 10:08:00	03-Mar-20 10:08:00	03-Mar-20 10:08:00	03-Mar-20 10:08:00	03-Mar-20 10:08:00
9.56	20.49	14.01	20.66	266.35	2.54	24.88	24.83
03-Mar-20 10:09:00	03-Mar-20 10:09:00	03-Mar-20 10:09:00	03-Mar-20 10:09:00	03-Mar-20 10:09:00	03-Mar-20 10:09:00	03-Mar-20 10:09:00	03-Mar-20 10:09:00
9.52	20.44	14.00	21.73	266.35	2.52	24.72	24.92
03-Mar-20 10:10:00	03-Mar-20 10:10:00	03-Mar-20 10:10:00	03-Mar-20 10:10:00	03-Mar-20 10:10:00	03-Mar-20 10:10:00	03-Mar-20 10:10:00	03-Mar-20 10:10:00
9.66	20.40	13.99	23.13	266.35	2.52	24.52	24.91
03-Mar-20 10:11:00	03-Mar-20 10:11:00	03-Mar-20 10:11:00	03-Mar-20 10:11:00	03-Mar-20 10:11:00	03-Mar-20 10:11:00	03-Mar-20 10:11:00	03-Mar-20 10:11:00
8.79	20.34	13.97	23.55	266.35	2.54	24.19	24.90
03-Mar-20 10:12:00	03-Mar-20 10:12:00	03-Mar-20 10:12:00	03-Mar-20 10:12:00	03-Mar-20 10:12:00	03-Mar-20 10:12:00	03-Mar-20 10:12:00	03-Mar-20 10:12:00
9.92	19.78	13.86	22.63	266.35	2.55	24.18	24.82
03-Mar-20 10:13:00	03-Mar-20 10:13:00	03-Mar-20 10:13:00	03-Mar-20 10:13:00	03-Mar-20 10:13:00	03-Mar-20 10:13:00	03-Mar-20 10:13:00	03-Mar-20 10:13:00
9.98	20.17	14.04	22.71	266.35	2.53	24.04	24.98
03-Mar-20 10:14:00	03-Mar-20 10:14:00	03-Mar-20 10:14:00	03-Mar-20 10:14:00	03-Mar-20 10:14:00	03-Mar-20 10:14:00	03-Mar-20 10:14:00	03-Mar-20 10:14:00
9.85	20.48	14.01	24.16	266.35	2.51	23.92	24.97
03-Mar-20 10:15:00	03-Mar-20 10:15:00	03-Mar-20 10:15:00	03-Mar-20 10:15:00	03-Mar-20 10:15:00	03-Mar-20 10:15:00	03-Mar-20 10:15:00	03-Mar-20 10:15:00
10.05	20.56	14.04	24.42	266.35	2.54	23.78	24.90
03-Mar-20 10:16:00	03-Mar-20 10:16:00	03-Mar-20 10:16:00	03-Mar-20 10:16:00	03-Mar-20 10:16:00	03-Mar-20 10:16:00	03-Mar-20 10:16:00	03-Mar-20 10:16:00
10.31	20.58	14.05	23.93	266.35	2.55	23.67	25.04
03-Mar-20 10:17:00	03-Mar-20 10:17:00	03-Mar-20 10:17:00	03-Mar-20 10:17:00	03-Mar-20 10:17:00	03-Mar-20 10:17:00	03-Mar-20 10:17:00	03-Mar-20 10:17:00
10.34	20.42	13.99	21.72	266.35	2.52	23.60	25.10
03-Mar-20 10:18:00	03-Mar-20 10:18:00	03-Mar-20 10:18:00	03-Mar-20 10:18:00	03-Mar-20 10:18:00	03-Mar-20 10:18:00	03-Mar-20 10:18:00	03-Mar-20 10:18:00
10.07	20.68	14.00	20.88	266.35	2.52	23.36	25.08
03-Mar-20 10:19:00	03-Mar-20 10:19:00	03-Mar-20 10:19:00	03-Mar-20 10:19:00	03-Mar-20 10:19:00	03-Mar-20 10:19:00	03-Mar-20 10:19:00	03-Mar-20 10:19:00
9.81	21.55	14.07	20.44	267.42	2.54	23.31	25.00
03-Mar-20 10:20:00	03-Mar-20 10:20:00	03-Mar-20 10:20:00	03-Mar-20 10:20:00	03-Mar-20 10:20:00	03-Mar-20 10:20:00	03-Mar-20 10:20:00	03-Mar-20 10:20:00
9.82	20.61	14.03	20.53	269.88	2.54	23.22	24.97
03-Mar-20 10:21:00	03-Mar-20 10:21:00	03-Mar-20 10:21:00	03-Mar-20 10:21:00	03-Mar-20 10:21:00	03-Mar-20 10:21:00	03-Mar-20 10:21:00	03-Mar-20 10:21:00
9.85	20.81	14.07	20.38	270.38	2.51	23.16	24.91
03-Mar-20 10:22:00	03-Mar-20 10:22:00	03-Mar-20 10:22:00	03-Mar-20 10:22:00	03-Mar-20 10:22:00	03-Mar-20 10:22:00	03-Mar-20 10:22:00	03-Mar-20 10:22:00
10.00	21.54	14.07	20.38	270.38	2.53	23.10	25.03
03-Mar-20 10:23:00	03-Mar-20 10:23:00	03-Mar-20 10:23:00	03-Mar-20 10:23:00	03-Mar-20 10:23:00	03-Mar-20 10:23:00	03-Mar-20 10:23:00	03-Mar-20 10:23:00
10.05	20.85	14.08	19.76	266.38	2.55	23.00	24.82
03-Mar-20 10:24:00	03-Mar-20 10:24:00	03-Mar-20 10:24:00	03-Mar-20 10:24:00	03-Mar-20 10:24:00	03-Mar-20 10:24:00	03-Mar-20 10:24:00	03-Mar-20 10:24:00
10.11	21.19	14.10	20.14	266.35	2.51	22.85	24.97
03-Mar-20 10:25:00	03-Mar-20 10:25:00	03-Mar-20 10:25:00	03-Mar-20 10:25:00	03-Mar-20 10:25:00	03-Mar-20 10:25:00	03-Mar-20 10:25:00	03-Mar-20 10:25:00
10.22	20.68	14.08	20.88	269.35	2.55	22.89	24.89
03-Mar-20 10:26:00	03-Mar-20 10:26:00	03-Mar-20 10:26:00	03-Mar-20 10:26:00	03-Mar-20 10:26:00	03-Mar-20 10:26:00	03-Mar-20 10:26:00	03-Mar-20 10:26:00
10.42	20.55	14.03	22.16	266.35	2.53	22.77	24.92
03-Mar-20 10:27:00	03-Mar-20 10:27:00	03-Mar-20 10:27:00	03-Mar-20 10:27:00	03-Mar-20 10:27:00	03-Mar-20 10:27:00	03-Mar-20 10:27:00	03-Mar-20 10:27:00
10.44	20.54	14.02	23.05	266.35	2.51	22.61	24.84
03-Mar-20 10:28:00	03-Mar-20 10:28:00	03-Mar-20 10:28:00	03-Mar-20 10:28:00	03-Mar-20 10:28:00	03-Mar-20 10:28:00	03-Mar-20 10:28:00	03-Mar-20 10:28:00
10.22	20.50	14.01	23.39	266.35	2.47	22.57	24.85
03-Mar-20 10:29:00	03-Mar-20 10:29:00	03-Mar-20 10:29:00	03-Mar-20 10:29:00	03-Mar-20 10:29:00	03-Mar-20 10:29:00	03-Mar-20 10:29:00	03-Mar-20 10:29:00
10.23	20.47	14.00	23.47	266.35	2.53	22.79	24.83
03-Mar-20 10:30:00	03-Mar-20 10:30:00	03-Mar-20 10:30:00	03-Mar-20 10:30:00	03-Mar-20 10:30:00	03-Mar-20 10:30:00	03-Mar-20 10:30:00	03-Mar-20 10:30:00
10.54	20.47	14.00	23.20	266.35	2.51	22.57	24.89
03-Mar-20 10:31:00	03-Mar-20 10:31:00	03-Mar-20 10:31:00	03-Mar-20 10:31:00	03-Mar-20 10:31:00	03-Mar-20 10:31:00	03-Mar-20 10:31:00	03-Mar-20 10:31:00
10.71	20.42	13.98	23.10	266.35	2.53	22.77	24.90
03-Mar-20 10:32:00	03-Mar-20 10:32:00	03-Mar-20 10:32:00	03-Mar-20 10:32:00	03-Mar-20 10:32:00	03-Mar-20 10:32:00	03-Mar-20 10:32:00	03-Mar-20 10:32:00
<b>Average Stack NOx, ppm (15% O2)</b>	<b>Average Stack CO, ppm (15% O2)</b>	<b>Average Stack O2 (%)</b>	<b>Average Duct Burner Gas Flow (MSCFH)</b>	<b>Average Turbine Gas Flow (MSCFH)</b>	<b>Ave. Steam Injection Rate (lbs)</b>	<b>Ave. Ammonia Injection (lb/hr)</b>	<b>Ave. Turbine Load (MW)</b>
10.22	20.47	14.04	21.47	266.66	2.53	24.08	24.95

Avg NH3 = 23.11 16/67  
Avg MW = 25.06

288.13 \* 1000 / 60 = 4802.17 cfm

average 4-5-6

4810, 11 cfm

R-5

New-Indy Onnard, LLC  
ROSEMOUNT CEMS SOURCE TEST - March 3, 2020

3/3/2020 11:06:16 AM

Stack NOx	Stack CO	Stack O2	Duct Burner Gas Flow	Turbine Gas Flow	Steam Injection	Ammonia Injection	Turbine Load
RS_131AC111B.CO2	RS_131AC111C.CO2	RS_131AC111B.CO2	09GASFLOW_A	GTGASFLOW	971-2016.WQ	931FIC173_MV	821-2016.DWATT
03-Mar-20 10:33:00	03-Mar-20 10:33:00	03-Mar-20 10:33:00	03-Mar-20 10:33:00	03-Mar-20 10:33:00	03-Mar-20 10:33:00	03-Mar-20 10:33:00	03-Mar-20 10:33:00
10.70	20.47	14.00	22.81	266.35	2.55	22.74	24.99
03-Mar-20 10:34:00	03-Mar-20 10:34:00	03-Mar-20 10:34:00	03-Mar-20 10:34:00	03-Mar-20 10:34:00	03-Mar-20 10:34:00	03-Mar-20 10:34:00	03-Mar-20 10:34:00
10.70	20.63	14.05	22.86	266.35	2.52	22.74	24.96
03-Mar-20 10:35:00	03-Mar-20 10:35:00	03-Mar-20 10:35:00	03-Mar-20 10:35:00	03-Mar-20 10:35:00	03-Mar-20 10:35:00	03-Mar-20 10:35:00	03-Mar-20 10:35:00
10.72	20.50	14.01	21.85	266.35	2.53	22.61	24.96
03-Mar-20 10:36:00	03-Mar-20 10:36:00	03-Mar-20 10:36:00	03-Mar-20 10:36:00	03-Mar-20 10:36:00	03-Mar-20 10:36:00	03-Mar-20 10:36:00	03-Mar-20 10:36:00
10.66	20.71	14.04	21.56	266.35	2.54	22.47	24.93
03-Mar-20 10:37:00	03-Mar-20 10:37:00	03-Mar-20 10:37:00	03-Mar-20 10:37:00	03-Mar-20 10:37:00	03-Mar-20 10:37:00	03-Mar-20 10:37:00	03-Mar-20 10:37:00
10.90	21.56	14.09	21.56	266.35	2.54	22.40	24.95
03-Mar-20 10:38:00	03-Mar-20 10:38:00	03-Mar-20 10:38:00	03-Mar-20 10:38:00	03-Mar-20 10:38:00	03-Mar-20 10:38:00	03-Mar-20 10:38:00	03-Mar-20 10:38:00
10.41	21.53	14.08	21.51	266.35	2.51	22.36	24.89
03-Mar-20 10:39:00	03-Mar-20 10:39:00	03-Mar-20 10:39:00	03-Mar-20 10:39:00	03-Mar-20 10:39:00	03-Mar-20 10:39:00	03-Mar-20 10:39:00	03-Mar-20 10:39:00
10.41	21.43	14.03	21.12	266.35	2.51	22.31	24.90
03-Mar-20 10:40:00	03-Mar-20 10:40:00	03-Mar-20 10:40:00	03-Mar-20 10:40:00	03-Mar-20 10:40:00	03-Mar-20 10:40:00	03-Mar-20 10:40:00	03-Mar-20 10:40:00
10.37	21.44	14.04	20.90	266.35	2.54	22.28	24.92
03-Mar-20 10:41:00	03-Mar-20 10:41:00	03-Mar-20 10:41:00	03-Mar-20 10:41:00	03-Mar-20 10:41:00	03-Mar-20 10:41:00	03-Mar-20 10:41:00	03-Mar-20 10:41:00
10.29	21.53	14.08	20.92	266.35	2.52	22.13	24.87
03-Mar-20 10:42:00	03-Mar-20 10:42:00	03-Mar-20 10:42:00	03-Mar-20 10:42:00	03-Mar-20 10:42:00	03-Mar-20 10:42:00	03-Mar-20 10:42:00	03-Mar-20 10:42:00
10.29	21.63	14.10	20.79	266.35	2.53	22.24	24.82
03-Mar-20 10:43:00	03-Mar-20 10:43:00	03-Mar-20 10:43:00	03-Mar-20 10:43:00	03-Mar-20 10:43:00	03-Mar-20 10:43:00	03-Mar-20 10:43:00	03-Mar-20 10:43:00
10.41	21.63	14.05	20.44	266.35	2.55	22.02	24.87
03-Mar-20 10:44:00	03-Mar-20 10:44:00	03-Mar-20 10:44:00	03-Mar-20 10:44:00	03-Mar-20 10:44:00	03-Mar-20 10:44:00	03-Mar-20 10:44:00	03-Mar-20 10:44:00
10.53	21.40	14.02	20.32	266.35	2.51	22.10	24.81
03-Mar-20 10:45:00	03-Mar-20 10:45:00	03-Mar-20 10:45:00	03-Mar-20 10:45:00	03-Mar-20 10:45:00	03-Mar-20 10:45:00	03-Mar-20 10:45:00	03-Mar-20 10:45:00
10.65	21.37	14.02	20.48	266.35	2.52	22.00	24.91
03-Mar-20 10:46:00	03-Mar-20 10:46:00	03-Mar-20 10:46:00	03-Mar-20 10:46:00	03-Mar-20 10:46:00	03-Mar-20 10:46:00	03-Mar-20 10:46:00	03-Mar-20 10:46:00
10.64	21.19	14.08	21.13	266.35	2.54	22.08	24.82
03-Mar-20 10:47:00	03-Mar-20 10:47:00	03-Mar-20 10:47:00	03-Mar-20 10:47:00	03-Mar-20 10:47:00	03-Mar-20 10:47:00	03-Mar-20 10:47:00	03-Mar-20 10:47:00
10.47	20.43	13.99	22.38	266.35	2.55	22.10	24.83
03-Mar-20 10:48:00	03-Mar-20 10:48:00	03-Mar-20 10:48:00	03-Mar-20 10:48:00	03-Mar-20 10:48:00	03-Mar-20 10:48:00	03-Mar-20 10:48:00	03-Mar-20 10:48:00
10.40	20.74	14.03	23.31	266.35	2.51	22.01	24.86
03-Mar-20 10:49:00	03-Mar-20 10:49:00	03-Mar-20 10:49:00	03-Mar-20 10:49:00	03-Mar-20 10:49:00	03-Mar-20 10:49:00	03-Mar-20 10:49:00	03-Mar-20 10:49:00
10.46	21.45	14.02	22.75	266.35	2.54	22.01	24.86
03-Mar-20 10:50:00	03-Mar-20 10:50:00	03-Mar-20 10:50:00	03-Mar-20 10:50:00	03-Mar-20 10:50:00	03-Mar-20 10:50:00	03-Mar-20 10:50:00	03-Mar-20 10:50:00
10.50	20.94	13.96	22.82	266.35	2.58	22.09	25.00
03-Mar-20 10:51:00	03-Mar-20 10:51:00	03-Mar-20 10:51:00	03-Mar-20 10:51:00	03-Mar-20 10:51:00	03-Mar-20 10:51:00	03-Mar-20 10:51:00	03-Mar-20 10:51:00
10.53	21.35	14.03	23.72	266.35	2.53	22.07	25.11
03-Mar-20 10:52:00	03-Mar-20 10:52:00	03-Mar-20 10:52:00	03-Mar-20 10:52:00	03-Mar-20 10:52:00	03-Mar-20 10:52:00	03-Mar-20 10:52:00	03-Mar-20 10:52:00
10.62	21.39	14.01	23.70	267.42	2.58	22.17	25.12
03-Mar-20 10:53:00	03-Mar-20 10:53:00	03-Mar-20 10:53:00	03-Mar-20 10:53:00	03-Mar-20 10:53:00	03-Mar-20 10:53:00	03-Mar-20 10:53:00	03-Mar-20 10:53:00
10.79	21.44	14.03	23.82	269.80	2.56	22.16	25.04
03-Mar-20 10:54:00	03-Mar-20 10:54:00	03-Mar-20 10:54:00	03-Mar-20 10:54:00	03-Mar-20 10:54:00	03-Mar-20 10:54:00	03-Mar-20 10:54:00	03-Mar-20 10:54:00
10.69	21.55	14.06	23.55	270.38	2.54	21.80	25.04
03-Mar-20 10:55:00	03-Mar-20 10:55:00	03-Mar-20 10:55:00	03-Mar-20 10:55:00	03-Mar-20 10:55:00	03-Mar-20 10:55:00	03-Mar-20 10:55:00	03-Mar-20 10:55:00
10.21	21.55	14.08	22.38	267.84	2.54	22.13	25.14
03-Mar-20 10:56:00	03-Mar-20 10:56:00	03-Mar-20 10:56:00	03-Mar-20 10:56:00	03-Mar-20 10:56:00	03-Mar-20 10:56:00	03-Mar-20 10:56:00	03-Mar-20 10:56:00
10.01	21.41	14.02	21.58	267.43	2.52	22.19	25.01
03-Mar-20 10:57:00	03-Mar-20 10:57:00	03-Mar-20 10:57:00	03-Mar-20 10:57:00	03-Mar-20 10:57:00	03-Mar-20 10:57:00	03-Mar-20 10:57:00	03-Mar-20 10:57:00
10.20	21.62	14.09	21.27	269.88	2.53	22.25	25.01
03-Mar-20 10:58:00	03-Mar-20 10:58:00	03-Mar-20 10:58:00	03-Mar-20 10:58:00	03-Mar-20 10:58:00	03-Mar-20 10:58:00	03-Mar-20 10:58:00	03-Mar-20 10:58:00
10.37	21.50	14.05	21.05	270.38	2.54	22.29	25.10
03-Mar-20 10:59:00	03-Mar-20 10:59:00	03-Mar-20 10:59:00	03-Mar-20 10:59:00	03-Mar-20 10:59:00	03-Mar-20 10:59:00	03-Mar-20 10:59:00	03-Mar-20 10:59:00
10.54	21.55	14.06	20.95	267.84	2.52	22.23	25.12
03-Mar-20 11:00:00	03-Mar-20 11:00:00	03-Mar-20 11:00:00	03-Mar-20 11:00:00	03-Mar-20 11:00:00	03-Mar-20 11:00:00	03-Mar-20 11:00:00	03-Mar-20 11:00:00
10.57	21.58	14.07	20.88	266.38	2.54	22.13	25.12
03-Mar-20 11:01:00	03-Mar-20 11:01:00	03-Mar-20 11:01:00	03-Mar-20 11:01:00	03-Mar-20 11:01:00	03-Mar-20 11:01:00	03-Mar-20 11:01:00	03-Mar-20 11:01:00
10.40	21.63	14.08	20.85	266.35	2.52	22.17	25.14
03-Mar-20 11:02:00	03-Mar-20 11:02:00	03-Mar-20 11:02:00	03-Mar-20 11:02:00	03-Mar-20 11:02:00	03-Mar-20 11:02:00	03-Mar-20 11:02:00	03-Mar-20 11:02:00
10.48	21.60	14.08	20.78	266.35	2.53	22.28	25.17
03-Mar-20 11:03:00	03-Mar-20 11:03:00	03-Mar-20 11:03:00	03-Mar-20 11:03:00	03-Mar-20 11:03:00	03-Mar-20 11:03:00	03-Mar-20 11:03:00	03-Mar-20 11:03:00
10.69	21.57	14.07	20.88	266.35	2.54	22.36	25.05
03-Mar-20 11:04:00	03-Mar-20 11:04:00	03-Mar-20 11:04:00	03-Mar-20 11:04:00	03-Mar-20 11:04:00	03-Mar-20 11:04:00	03-Mar-20 11:04:00	03-Mar-20 11:04:00
11.03	21.71	14.11	20.57	266.35	2.54	22.44	25.18
03-Mar-20 11:05:00	03-Mar-20 11:05:00	03-Mar-20 11:05:00	03-Mar-20 11:05:00	03-Mar-20 11:05:00	03-Mar-20 11:05:00	03-Mar-20 11:05:00	03-Mar-20 11:05:00
10.78	21.57	14.07	20.46	266.35	2.52	22.51	25.12
<b>Average Stack NOx, ppm (15% O2)</b>	<b>Average Stack CO, ppm (15% O2)</b>	<b>Average Stack O2 (%)</b>	<b>Average Duct Burner Gas Flow (MSCFH)</b>	<b>Average Turbine Gas Flow (MSCFH)</b>	<b>Ave. Steam Injection Rate (lbs/hr)</b>	<b>Ave. Ammonia Injection (lb/hr)</b>	<b>Ave. Turbine Load (MW)</b>
10.52	21.32	14.05	21.76	266.97	2.54	22.23	25.02

288.73 \* 1000 / 60 = 4812.17 cfm

R-6

New-Indy Oxnard, LLC  
ROSEMOUNT CEMS SOURCE TEST - March 3, 2020

3/3/2020 11:32 2/3/2020 11:33 1 m

Stack NOx	Stack CO	Stack O2	Duct Burner Gas Flow	Turbine Gas Flow	Steam Injection	Ammonia Injection	Turbine Load
RS_NOX_PPM	RS_R1AC111C.CCO	RL_R1AC111B.O2	DSGASFLOW_A	GTGASFLOW	921-2015.WQ	931FIC1173_AW	921-2015.DWATT
10.86	21.81	14.06	20.35	266.35	2.55	22.44	25.15
03-Mar-20 11:06:00	03-Mar-20 11:06:00	03-Mar-20 11:06:00	03-Mar-20 11:06:00	03-Mar-20 11:06:00	03-Mar-20 11:06:00	03-Mar-20 11:06:00	03-Mar-20 11:06:00
10.68	21.52	14.05	20.25	268.35	2.54	22.49	25.13
03-Mar-20 11:07:00	03-Mar-20 11:07:00	03-Mar-20 11:07:00	03-Mar-20 11:07:00	03-Mar-20 11:07:00	03-Mar-20 11:07:00	03-Mar-20 11:07:00	03-Mar-20 11:07:00
10.58	21.33	13.98	20.40	267.42	2.51	22.42	25.08
03-Mar-20 11:08:00	03-Mar-20 11:08:00	03-Mar-20 11:08:00	03-Mar-20 11:08:00	03-Mar-20 11:08:00	03-Mar-20 11:08:00	03-Mar-20 11:08:00	03-Mar-20 11:08:00
10.52	21.35	14.00	20.90	269.68	2.53	22.50	25.07
03-Mar-20 11:09:00	03-Mar-20 11:09:00	03-Mar-20 11:09:00	03-Mar-20 11:09:00	03-Mar-20 11:09:00	03-Mar-20 11:09:00	03-Mar-20 11:09:00	03-Mar-20 11:09:00
10.58	21.37	14.01	21.35	270.38	2.53	22.64	25.05
03-Mar-20 11:10:00	03-Mar-20 11:10:00	03-Mar-20 11:10:00	03-Mar-20 11:10:00	03-Mar-20 11:10:00	03-Mar-20 11:10:00	03-Mar-20 11:10:00	03-Mar-20 11:10:00
10.54	20.91	14.04	22.52	267.64	2.54	22.66	25.05
03-Mar-20 11:11:00	03-Mar-20 11:11:00	03-Mar-20 11:11:00	03-Mar-20 11:11:00	03-Mar-20 11:11:00	03-Mar-20 11:11:00	03-Mar-20 11:11:00	03-Mar-20 11:11:00
10.54	20.81	14.04	23.05	268.36	2.53	22.68	25.18
03-Mar-20 11:12:00	03-Mar-20 11:12:00	03-Mar-20 11:12:00	03-Mar-20 11:12:00	03-Mar-20 11:12:00	03-Mar-20 11:12:00	03-Mar-20 11:12:00	03-Mar-20 11:12:00
10.51	20.72	14.01	23.02	269.35	2.53	22.90	25.20
03-Mar-20 11:13:00	03-Mar-20 11:13:00	03-Mar-20 11:13:00	03-Mar-20 11:13:00	03-Mar-20 11:13:00	03-Mar-20 11:13:00	03-Mar-20 11:13:00	03-Mar-20 11:13:00
10.43	21.51	14.04	22.30	269.35	2.55	22.90	25.08
03-Mar-20 11:14:00	03-Mar-20 11:14:00	03-Mar-20 11:14:00	03-Mar-20 11:14:00	03-Mar-20 11:14:00	03-Mar-20 11:14:00	03-Mar-20 11:14:00	03-Mar-20 11:14:00
10.30	21.60	14.07	20.64	268.35	2.53	22.87	25.25
03-Mar-20 11:15:00	03-Mar-20 11:15:00	03-Mar-20 11:15:00	03-Mar-20 11:15:00	03-Mar-20 11:15:00	03-Mar-20 11:15:00	03-Mar-20 11:15:00	03-Mar-20 11:15:00
10.23	21.50	14.04	19.62	266.35	2.52	22.74	25.17
03-Mar-20 11:16:00	03-Mar-20 11:16:00	03-Mar-20 11:16:00	03-Mar-20 11:16:00	03-Mar-20 11:16:00	03-Mar-20 11:16:00	03-Mar-20 11:16:00	03-Mar-20 11:16:00
10.26	21.62	14.08	19.50	266.35	2.52	22.86	25.19
03-Mar-20 11:17:00	03-Mar-20 11:17:00	03-Mar-20 11:17:00	03-Mar-20 11:17:00	03-Mar-20 11:17:00	03-Mar-20 11:17:00	03-Mar-20 11:17:00	03-Mar-20 11:17:00
10.41	21.57	14.08	18.43	267.42	2.58	22.84	25.20
03-Mar-20 11:18:00	03-Mar-20 11:18:00	03-Mar-20 11:18:00	03-Mar-20 11:18:00	03-Mar-20 11:18:00	03-Mar-20 11:18:00	03-Mar-20 11:18:00	03-Mar-20 11:18:00
10.75	21.67	14.09	19.46	269.68	2.61	22.83	25.20
03-Mar-20 11:19:00	03-Mar-20 11:19:00	03-Mar-20 11:19:00	03-Mar-20 11:19:00	03-Mar-20 11:19:00	03-Mar-20 11:19:00	03-Mar-20 11:19:00	03-Mar-20 11:19:00
10.83	21.63	14.09	19.53	271.46	2.57	22.85	25.32
03-Mar-20 11:20:00	03-Mar-20 11:20:00	03-Mar-20 11:20:00	03-Mar-20 11:20:00	03-Mar-20 11:20:00	03-Mar-20 11:20:00	03-Mar-20 11:20:00	03-Mar-20 11:20:00
10.80	21.60	14.07	19.68	271.47	2.58	22.90	25.25
03-Mar-20 11:21:00	03-Mar-20 11:21:00	03-Mar-20 11:21:00	03-Mar-20 11:21:00	03-Mar-20 11:21:00	03-Mar-20 11:21:00	03-Mar-20 11:21:00	03-Mar-20 11:21:00
10.82	21.90	14.16	19.67	270.39	2.59	22.99	25.32
03-Mar-20 11:22:00	03-Mar-20 11:22:00	03-Mar-20 11:22:00	03-Mar-20 11:22:00	03-Mar-20 11:22:00	03-Mar-20 11:22:00	03-Mar-20 11:22:00	03-Mar-20 11:22:00
10.72	21.67	14.09	19.47	267.64	2.61	23.03	25.19
03-Mar-20 11:23:00	03-Mar-20 11:23:00	03-Mar-20 11:23:00	03-Mar-20 11:23:00	03-Mar-20 11:23:00	03-Mar-20 11:23:00	03-Mar-20 11:23:00	03-Mar-20 11:23:00
10.69	21.56	14.06	19.37	267.43	2.61	23.07	25.27
03-Mar-20 11:24:00	03-Mar-20 11:24:00	03-Mar-20 11:24:00	03-Mar-20 11:24:00	03-Mar-20 11:24:00	03-Mar-20 11:24:00	03-Mar-20 11:24:00	03-Mar-20 11:24:00
10.77	21.44	14.02	19.45	269.68	2.58	23.12	25.27
03-Mar-20 11:25:00	03-Mar-20 11:25:00	03-Mar-20 11:25:00	03-Mar-20 11:25:00	03-Mar-20 11:25:00	03-Mar-20 11:25:00	03-Mar-20 11:25:00	03-Mar-20 11:25:00
10.81	21.64	14.09	19.60	270.38	2.60	23.19	25.30
03-Mar-20 11:26:00	03-Mar-20 11:26:00	03-Mar-20 11:26:00	03-Mar-20 11:26:00	03-Mar-20 11:26:00	03-Mar-20 11:26:00	03-Mar-20 11:26:00	03-Mar-20 11:26:00
10.76	21.66	14.09	19.86	267.64	2.60	23.29	25.25
03-Mar-20 11:27:00	03-Mar-20 11:27:00	03-Mar-20 11:27:00	03-Mar-20 11:27:00	03-Mar-20 11:27:00	03-Mar-20 11:27:00	03-Mar-20 11:27:00	03-Mar-20 11:27:00
10.78	21.22	14.03	20.45	267.43	2.59	23.36	25.25
03-Mar-20 11:28:00	03-Mar-20 11:28:00	03-Mar-20 11:28:00	03-Mar-20 11:28:00	03-Mar-20 11:28:00	03-Mar-20 11:28:00	03-Mar-20 11:28:00	03-Mar-20 11:28:00
10.81	20.59	14.02	21.44	269.96	2.60	23.40	25.22
03-Mar-20 11:29:00	03-Mar-20 11:29:00	03-Mar-20 11:29:00	03-Mar-20 11:29:00	03-Mar-20 11:29:00	03-Mar-20 11:29:00	03-Mar-20 11:29:00	03-Mar-20 11:29:00
10.82	20.83	14.04	21.85	271.46	2.60	23.31	25.27
03-Mar-20 11:30:00	03-Mar-20 11:30:00	03-Mar-20 11:30:00	03-Mar-20 11:30:00	03-Mar-20 11:30:00	03-Mar-20 11:30:00	03-Mar-20 11:30:00	03-Mar-20 11:30:00
10.78	20.64	14.04	21.82	270.38	2.56	23.39	25.16
03-Mar-20 11:31:00	03-Mar-20 11:31:00	03-Mar-20 11:31:00	03-Mar-20 11:31:00	03-Mar-20 11:31:00	03-Mar-20 11:31:00	03-Mar-20 11:31:00	03-Mar-20 11:31:00
10.73	20.63	14.04	21.62	270.39	2.57	23.41	25.27
03-Mar-20 11:32:00	03-Mar-20 11:32:00	03-Mar-20 11:32:00	03-Mar-20 11:32:00	03-Mar-20 11:32:00	03-Mar-20 11:32:00	03-Mar-20 11:32:00	03-Mar-20 11:32:00
10.67	20.61	14.03	21.02	267.64	2.59	23.69	25.24
03-Mar-20 11:33:00	03-Mar-20 11:33:00	03-Mar-20 11:33:00	03-Mar-20 11:33:00	03-Mar-20 11:33:00	03-Mar-20 11:33:00	03-Mar-20 11:33:00	03-Mar-20 11:33:00
10.59	20.55	14.01	20.45	267.43	2.62	23.62	25.22
03-Mar-20 11:34:00	03-Mar-20 11:34:00	03-Mar-20 11:34:00	03-Mar-20 11:34:00	03-Mar-20 11:34:00	03-Mar-20 11:34:00	03-Mar-20 11:34:00	03-Mar-20 11:34:00
10.47	20.64	14.00	19.77	269.68	2.57	23.47	25.16
03-Mar-20 11:35:00	03-Mar-20 11:35:00	03-Mar-20 11:35:00	03-Mar-20 11:35:00	03-Mar-20 11:35:00	03-Mar-20 11:35:00	03-Mar-20 11:35:00	03-Mar-20 11:35:00
10.47	21.62	14.08	19.08	270.38	2.58	23.40	25.14
03-Mar-20 11:36:00	03-Mar-20 11:36:00	03-Mar-20 11:36:00	03-Mar-20 11:36:00	03-Mar-20 11:36:00	03-Mar-20 11:36:00	03-Mar-20 11:36:00	03-Mar-20 11:36:00
10.63	21.60	14.07	18.38	267.64	2.59	23.38	25.19
03-Mar-20 11:37:00	03-Mar-20 11:37:00	03-Mar-20 11:37:00	03-Mar-20 11:37:00	03-Mar-20 11:37:00	03-Mar-20 11:37:00	03-Mar-20 11:37:00	03-Mar-20 11:37:00
10.80	21.88	14.10	18.12	267.43	2.60	23.14	25.26
03-Mar-20 11:38:00	03-Mar-20 11:38:00	03-Mar-20 11:38:00	03-Mar-20 11:38:00	03-Mar-20 11:38:00	03-Mar-20 11:38:00	03-Mar-20 11:38:00	03-Mar-20 11:38:00
<b>Average Stack NOx ppm (15% O2)</b>	<b>Average Stack CO, ppm (15% O2)</b>	<b>Average Stack O2 (%)</b>	<b>Average Duct Burner Gas Flow (MSCFH)</b>	<b>Average Turbine Gas Flow (MSCFH)</b>	<b>Ave. Steam Injection Rate (lb/hr)</b>	<b>Ave. Ammonia Injection (lb/hr)</b>	<b>Ave. Turbine Load (MWh)</b>
10.63	21.28	14.05	20.41	268.55	2.67	23.02	25.21

288,916 \* 1000 / 60 = 4816.0 cfm

R-7

New-Indy Oxnard, LLC  
ROSEMOUNT CEMS SOURCE TEST - March 3, 2020

3/3/2020 7:36 AM ROSEMOUNT1231 1.m

Stack NOx	Stack CO	Stack O2	Duct Burner Gas Flow	Turbine Gas Flow	Steam Injection	Ammonia Injection	Turbine Load
RS_01MCH118102	RS_01MCH118102	RS_01MCH118102	380ASFLWA_A	07048FLOW	921-2015.WQ	519FC1173_NV	921-2015.DWATT
10.35	21.79	14.14	19.43	270.38	05-Mar-20 12:00:00	05-Mar-20 12:00:00	25.39
10.62	21.56	14.07	20.20	267.84	05-Mar-20 12:01:00	05-Mar-20 12:01:00	25.34
10.64	21.51	14.05	20.25	267.43	05-Mar-20 12:02:00	05-Mar-20 12:02:00	25.27
10.32	21.50	14.05	19.31	269.98	05-Mar-20 12:03:00	05-Mar-20 12:03:00	25.27
10.18	21.62	14.09	19.83	270.38	05-Mar-20 12:04:00	05-Mar-20 12:04:00	25.15
10.29	21.51	14.05	19.53	267.84	05-Mar-20 12:05:00	05-Mar-20 12:05:00	25.21
10.40	21.64	14.09	19.38	267.43	05-Mar-20 12:06:00	05-Mar-20 12:06:00	25.28
10.52	21.47	14.04	18.94	269.98	05-Mar-20 12:07:00	05-Mar-20 12:07:00	25.30
10.60	21.51	14.05	19.06	271.47	05-Mar-20 12:08:00	05-Mar-20 12:08:00	25.30
10.67	21.29	14.06	19.84	271.47	05-Mar-20 12:09:00	05-Mar-20 12:09:00	25.31
10.67	21.50	14.05	19.52	271.47	05-Mar-20 12:10:00	05-Mar-20 12:10:00	25.28
10.58	21.47	14.04	20.70	271.47	05-Mar-20 12:11:00	05-Mar-20 12:11:00	25.30
10.55	21.45	14.03	21.01	270.38	05-Mar-20 12:12:00	05-Mar-20 12:12:00	25.38
10.60	21.40	14.01	21.50	267.84	05-Mar-20 12:13:00	05-Mar-20 12:13:00	25.19
10.56	21.36	14.01	21.90	267.43	05-Mar-20 12:14:00	05-Mar-20 12:14:00	25.26
10.40	21.47	14.04	22.17	269.98	05-Mar-20 12:15:00	05-Mar-20 12:15:00	25.28
10.36	21.39	14.01	22.12	271.47	05-Mar-20 12:16:00	05-Mar-20 12:16:00	25.30
10.54	21.40	14.02	21.63	271.47	05-Mar-20 12:17:00	05-Mar-20 12:17:00	25.45
10.57	21.43	14.03	21.05	271.47	05-Mar-20 12:18:00	05-Mar-20 12:18:00	25.41
10.45	21.41	14.02	20.34	271.47	05-Mar-20 12:19:00	05-Mar-20 12:19:00	25.39
10.44	21.63	14.09	19.75	271.47	05-Mar-20 12:20:00	05-Mar-20 12:20:00	25.31
10.60	21.86	14.18	18.33	271.47	05-Mar-20 12:21:00	05-Mar-20 12:21:00	25.29
10.68	21.69	14.11	19.22	271.47	05-Mar-20 12:22:00	05-Mar-20 12:22:00	25.32
10.65	21.65	14.10	19.51	271.47	05-Mar-20 12:23:00	05-Mar-20 12:23:00	25.29
10.70	21.81	14.15	19.51	271.47	05-Mar-20 12:24:00	05-Mar-20 12:24:00	25.35
10.84	21.89	14.11	19.69	271.47	05-Mar-20 12:25:00	05-Mar-20 12:25:00	25.34
10.83	21.56	14.06	18.86	271.47	05-Mar-20 12:26:00	05-Mar-20 12:26:00	25.36
10.61	21.61	14.08	19.31	271.47	05-Mar-20 12:27:00	05-Mar-20 12:27:00	25.48
10.56	21.74	14.12	19.23	271.47	05-Mar-20 12:28:00	05-Mar-20 12:28:00	25.40
10.75	21.57	14.07	19.59	271.47	05-Mar-20 12:29:00	05-Mar-20 12:29:00	25.42
10.49	21.34	14.03	18.56	271.47	05-Mar-20 12:30:00	05-Mar-20 12:30:00	25.39
10.49	21.45	14.03	19.37	271.47	05-Mar-20 12:31:00	05-Mar-20 12:31:00	25.26
10.39	21.56	14.07	20.16	271.47	05-Mar-20 12:32:00	05-Mar-20 12:32:00	25.45
<b>Average Stack NOx, ppm (15% O2)</b>	<b>Average Stack CO, ppm (15% O2)</b>	<b>Average Stack O2 (%)</b>	<b>Average Duct Burner Gas Flow (MSCFH)</b>	<b>Average Turbine Gas Flow (MSCFH)</b>	<b>Ave. Steam Injection Rate (lbs/hr)</b>	<b>Ave. Ammonia Injection (lb/hr)</b>	<b>Ave. Turbine Load (MWh)</b>
10.55	21.54	14.06	19.85	270.54	2.69	23.25	25.32

290.49 \* 1000 / 60 = 4841.5 cfm

AUGUST 7-8-9

4862.68 cfm

*Kater*

New-indy Oxnard, LLC  
ROSEMOUNT CEMS SOURCE TEST - March 3, 2020

3/3/20 10:16 AM

Stack NOx	Stack CO	Stack O2	Duct Burner Gas Flow	Turbine Gas Flow	OTGASFLOW	Steam Injection	Ammonia Injection	Turbine Load
10.54	21.32	13.89	20.92	271.47	271.47	2.59	23.69	25.36
03-Mar-20 12:33:00	03-Mar-20 12:33:00	03-Mar-20 12:33:00	03-Mar-20 12:33:00	03-Mar-20 12:33:00	03-Mar-20 12:33:00	03-Mar-20 12:33:00	03-Mar-20 12:33:00	03-Mar-20 12:33:00
10.65	21.03	13.99	21.56	271.47	271.47	2.60	23.57	25.35
03-Mar-20 12:34:00	03-Mar-20 12:34:00	03-Mar-20 12:34:00	03-Mar-20 12:34:00	03-Mar-20 12:34:00	03-Mar-20 12:34:00	03-Mar-20 12:34:00	03-Mar-20 12:34:00	03-Mar-20 12:34:00
10.72	20.57	14.04	21.89	271.47	271.47	2.60	23.57	25.47
03-Mar-20 12:35:00	03-Mar-20 12:35:00	03-Mar-20 12:35:00	03-Mar-20 12:35:00	03-Mar-20 12:35:00	03-Mar-20 12:35:00	03-Mar-20 12:35:00	03-Mar-20 12:35:00	03-Mar-20 12:35:00
10.76	20.43	13.99	21.60	271.47	271.47	2.59	23.67	25.50
03-Mar-20 12:36:00	03-Mar-20 12:36:00	03-Mar-20 12:36:00	03-Mar-20 12:36:00	03-Mar-20 12:36:00	03-Mar-20 12:36:00	03-Mar-20 12:36:00	03-Mar-20 12:36:00	03-Mar-20 12:36:00
10.76	21.07	14.03	20.35	271.47	271.47	2.59	23.64	25.37
03-Mar-20 12:37:00	03-Mar-20 12:37:00	03-Mar-20 12:37:00	03-Mar-20 12:37:00	03-Mar-20 12:37:00	03-Mar-20 12:37:00	03-Mar-20 12:37:00	03-Mar-20 12:37:00	03-Mar-20 12:37:00
10.77	21.51	14.04	19.48	271.47	271.47	2.59	23.44	25.40
03-Mar-20 12:38:00	03-Mar-20 12:38:00	03-Mar-20 12:38:00	03-Mar-20 12:38:00	03-Mar-20 12:38:00	03-Mar-20 12:38:00	03-Mar-20 12:38:00	03-Mar-20 12:38:00	03-Mar-20 12:38:00
10.78	21.49	14.04	19.28	271.47	271.47	2.59	23.51	25.34
03-Mar-20 12:39:00	03-Mar-20 12:39:00	03-Mar-20 12:39:00	03-Mar-20 12:39:00	03-Mar-20 12:39:00	03-Mar-20 12:39:00	03-Mar-20 12:39:00	03-Mar-20 12:39:00	03-Mar-20 12:39:00
10.69	21.63	14.08	18.88	271.47	271.47	2.60	23.42	25.34
03-Mar-20 12:40:00	03-Mar-20 12:40:00	03-Mar-20 12:40:00	03-Mar-20 12:40:00	03-Mar-20 12:40:00	03-Mar-20 12:40:00	03-Mar-20 12:40:00	03-Mar-20 12:40:00	03-Mar-20 12:40:00
10.39	21.68	14.09	18.23	271.47	271.47	2.57	23.66	25.25
03-Mar-20 12:41:00	03-Mar-20 12:41:00	03-Mar-20 12:41:00	03-Mar-20 12:41:00	03-Mar-20 12:41:00	03-Mar-20 12:41:00	03-Mar-20 12:41:00	03-Mar-20 12:41:00	03-Mar-20 12:41:00
10.26	21.66	14.10	17.82	270.38	270.38	2.60	23.40	25.22
03-Mar-20 12:42:00	03-Mar-20 12:42:00	03-Mar-20 12:42:00	03-Mar-20 12:42:00	03-Mar-20 12:42:00	03-Mar-20 12:42:00	03-Mar-20 12:42:00	03-Mar-20 12:42:00	03-Mar-20 12:42:00
10.37	21.75	14.12	17.75	267.84	267.84	2.61	23.44	25.20
03-Mar-20 12:43:00	03-Mar-20 12:43:00	03-Mar-20 12:43:00	03-Mar-20 12:43:00	03-Mar-20 12:43:00	03-Mar-20 12:43:00	03-Mar-20 12:43:00	03-Mar-20 12:43:00	03-Mar-20 12:43:00
10.38	21.64	14.08	17.65	271.47	271.47	2.61	23.40	25.29
03-Mar-20 12:44:00	03-Mar-20 12:44:00	03-Mar-20 12:44:00	03-Mar-20 12:44:00	03-Mar-20 12:44:00	03-Mar-20 12:44:00	03-Mar-20 12:44:00	03-Mar-20 12:44:00	03-Mar-20 12:44:00
10.27	21.67	14.09	17.48	269.88	269.88	2.59	23.28	25.28
03-Mar-20 12:45:00	03-Mar-20 12:45:00	03-Mar-20 12:45:00	03-Mar-20 12:45:00	03-Mar-20 12:45:00	03-Mar-20 12:45:00	03-Mar-20 12:45:00	03-Mar-20 12:45:00	03-Mar-20 12:45:00
10.29	21.61	14.07	17.85	271.46	271.46	2.61	23.69	25.21
03-Mar-20 12:46:00	03-Mar-20 12:46:00	03-Mar-20 12:46:00	03-Mar-20 12:46:00	03-Mar-20 12:46:00	03-Mar-20 12:46:00	03-Mar-20 12:46:00	03-Mar-20 12:46:00	03-Mar-20 12:46:00
10.49	21.67	14.09	18.25	271.47	271.47	2.59	23.42	25.27
03-Mar-20 12:47:00	03-Mar-20 12:47:00	03-Mar-20 12:47:00	03-Mar-20 12:47:00	03-Mar-20 12:47:00	03-Mar-20 12:47:00	03-Mar-20 12:47:00	03-Mar-20 12:47:00	03-Mar-20 12:47:00
10.55	21.55	14.05	18.88	271.47	271.47	2.59	23.28	25.30
03-Mar-20 12:48:00	03-Mar-20 12:48:00	03-Mar-20 12:48:00	03-Mar-20 12:48:00	03-Mar-20 12:48:00	03-Mar-20 12:48:00	03-Mar-20 12:48:00	03-Mar-20 12:48:00	03-Mar-20 12:48:00
10.43	21.46	14.03	18.86	271.47	271.47	2.61	23.28	25.33
03-Mar-20 12:49:00	03-Mar-20 12:49:00	03-Mar-20 12:49:00	03-Mar-20 12:49:00	03-Mar-20 12:49:00	03-Mar-20 12:49:00	03-Mar-20 12:49:00	03-Mar-20 12:49:00	03-Mar-20 12:49:00
10.44	21.42	14.01	19.35	271.47	271.47	2.58	23.19	25.32
03-Mar-20 12:50:00	03-Mar-20 12:50:00	03-Mar-20 12:50:00	03-Mar-20 12:50:00	03-Mar-20 12:50:00	03-Mar-20 12:50:00	03-Mar-20 12:50:00	03-Mar-20 12:50:00	03-Mar-20 12:50:00
10.62	21.06	14.01	20.21	271.47	271.47	2.59	23.12	25.15
03-Mar-20 12:51:00	03-Mar-20 12:51:00	03-Mar-20 12:51:00	03-Mar-20 12:51:00	03-Mar-20 12:51:00	03-Mar-20 12:51:00	03-Mar-20 12:51:00	03-Mar-20 12:51:00	03-Mar-20 12:51:00
10.58	20.50	14.01	21.58	271.47	271.47	2.60	23.09	25.21
03-Mar-20 12:52:00	03-Mar-20 12:52:00	03-Mar-20 12:52:00	03-Mar-20 12:52:00	03-Mar-20 12:52:00	03-Mar-20 12:52:00	03-Mar-20 12:52:00	03-Mar-20 12:52:00	03-Mar-20 12:52:00
10.25	20.50	14.00	23.66	271.47	271.47	2.60	23.05	25.13
03-Mar-20 12:53:00	03-Mar-20 12:53:00	03-Mar-20 12:53:00	03-Mar-20 12:53:00	03-Mar-20 12:53:00	03-Mar-20 12:53:00	03-Mar-20 12:53:00	03-Mar-20 12:53:00	03-Mar-20 12:53:00
10.14	20.32	13.84	24.61	270.38	270.38	2.61	23.02	25.18
03-Mar-20 12:54:00	03-Mar-20 12:54:00	03-Mar-20 12:54:00	03-Mar-20 12:54:00	03-Mar-20 12:54:00	03-Mar-20 12:54:00	03-Mar-20 12:54:00	03-Mar-20 12:54:00	03-Mar-20 12:54:00
10.32	20.48	13.99	24.61	267.84	267.84	2.60	23.03	25.13
03-Mar-20 12:55:00	03-Mar-20 12:55:00	03-Mar-20 12:55:00	03-Mar-20 12:55:00	03-Mar-20 12:55:00	03-Mar-20 12:55:00	03-Mar-20 12:55:00	03-Mar-20 12:55:00	03-Mar-20 12:55:00
10.45	20.47	13.89	23.61	267.84	267.84	2.59	23.10	25.18
03-Mar-20 12:56:00	03-Mar-20 12:56:00	03-Mar-20 12:56:00	03-Mar-20 12:56:00	03-Mar-20 12:56:00	03-Mar-20 12:56:00	03-Mar-20 12:56:00	03-Mar-20 12:56:00	03-Mar-20 12:56:00
10.49	20.38	13.86	23.49	269.88	269.88	2.61	23.17	25.26
03-Mar-20 12:57:00	03-Mar-20 12:57:00	03-Mar-20 12:57:00	03-Mar-20 12:57:00	03-Mar-20 12:57:00	03-Mar-20 12:57:00	03-Mar-20 12:57:00	03-Mar-20 12:57:00	03-Mar-20 12:57:00
10.64	20.68	14.00	22.88	271.46	271.46	2.58	23.32	25.35
03-Mar-20 12:58:00	03-Mar-20 12:58:00	03-Mar-20 12:58:00	03-Mar-20 12:58:00	03-Mar-20 12:58:00	03-Mar-20 12:58:00	03-Mar-20 12:58:00	03-Mar-20 12:58:00	03-Mar-20 12:58:00
10.93	21.44	14.02	21.61	271.47	271.47	2.60	23.36	25.25
03-Mar-20 12:59:00	03-Mar-20 12:59:00	03-Mar-20 12:59:00	03-Mar-20 12:59:00	03-Mar-20 12:59:00	03-Mar-20 12:59:00	03-Mar-20 12:59:00	03-Mar-20 12:59:00	03-Mar-20 12:59:00
10.97	21.51	14.04	20.40	271.47	271.47	2.60	23.41	25.21
03-Mar-20 13:00:00	03-Mar-20 13:00:00	03-Mar-20 13:00:00	03-Mar-20 13:00:00	03-Mar-20 13:00:00	03-Mar-20 13:00:00	03-Mar-20 13:00:00	03-Mar-20 13:00:00	03-Mar-20 13:00:00
10.66	21.51	14.04	19.30	271.47	271.47	2.58	23.39	25.27
03-Mar-20 13:01:00	03-Mar-20 13:01:00	03-Mar-20 13:01:00	03-Mar-20 13:01:00	03-Mar-20 13:01:00	03-Mar-20 13:01:00	03-Mar-20 13:01:00	03-Mar-20 13:01:00	03-Mar-20 13:01:00
10.47	21.54	14.05	18.86	271.47	271.47	2.59	23.28	25.18
03-Mar-20 13:02:00	03-Mar-20 13:02:00	03-Mar-20 13:02:00	03-Mar-20 13:02:00	03-Mar-20 13:02:00	03-Mar-20 13:02:00	03-Mar-20 13:02:00	03-Mar-20 13:02:00	03-Mar-20 13:02:00
10.43	21.54	14.05	19.32	271.47	271.47	2.61	23.22	25.21
03-Mar-20 13:03:00	03-Mar-20 13:03:00	03-Mar-20 13:03:00	03-Mar-20 13:03:00	03-Mar-20 13:03:00	03-Mar-20 13:03:00	03-Mar-20 13:03:00	03-Mar-20 13:03:00	03-Mar-20 13:03:00
10.38	21.46	14.03	18.60	271.47	271.47	2.60	23.17	25.25
03-Mar-20 13:04:00	03-Mar-20 13:04:00	03-Mar-20 13:04:00	03-Mar-20 13:04:00	03-Mar-20 13:04:00	03-Mar-20 13:04:00	03-Mar-20 13:04:00	03-Mar-20 13:04:00	03-Mar-20 13:04:00
10.28	21.60	14.07	18.64	271.47	271.47	2.60	23.14	25.26
03-Mar-20 13:05:00	03-Mar-20 13:05:00	03-Mar-20 13:05:00	03-Mar-20 13:05:00	03-Mar-20 13:05:00	03-Mar-20 13:05:00	03-Mar-20 13:05:00	03-Mar-20 13:05:00	03-Mar-20 13:05:00
<b>Average Stack NOx, ppm (15% O2)</b>	<b>Average Stack CO, ppm (15% O2)</b>	<b>Average Stack O2 (%)</b>	<b>Average Duct Burner Gas Flow (MSCFH)</b>	<b>Average Turbine Gas Flow (MSCFH)</b>	<b>Average Turbine Gas Flow (MSCFH)</b>	<b>Average Steam Injection Rate (lb/hr)</b>	<b>Average Ammonia Injection (lb/hr)</b>	<b>Ave. Turbine Load (MWh)</b>
10.62	21.22	14.03	20.26	270.85	270.85	2.69	23.34	25.28

291.11 \* 1000 / 60 = 4851.83 cfm

R-9

New-Indy Oxnard, LLC  
ROSEMOUNT CEMS SOURCE TEST - March 3, 2020

3020201136 1320201139 116

Stack NOx	Stack CO	Stack O2	Duct Burner Gas Flow	Turbine Gas Flow	Steam Injection	Ammonia Injection	Turbine Load
RS_13A11C111C.CCO	RS_13A11C111B.O2	RS_13A11C111B.O2	ROGASFLOW_A	GTGASFLOW	921-2016.WQ	931F1C1173_AW	921-2015.DWATT
10.30	21.61	14.08	18.74	271.47	2.58	23.32	25.30
10.44	21.77	14.13	19.06	271.47	2.60	23.26	25.31
10.51	21.64	14.08	20.35	271.47	2.59	23.33	25.50
10.47	21.40	14.01	20.98	271.47	2.60	23.36	25.57
10.59	21.31	13.88	21.83	271.47	2.59	23.53	25.33
10.70	20.75	14.00	22.88	271.47	2.59	23.48	25.50
10.74	20.34	13.95	24.20	270.59	2.58	23.44	25.21
10.60	20.27	13.93	25.50	267.84	2.60	23.44	25.11
10.57	19.45	13.88	26.60	267.43	2.61	23.56	25.20
10.72	19.18	13.84	27.45	259.88	2.59	23.64	25.28
10.78	19.15	13.83	28.18	271.47	2.60	23.65	25.35
10.75	19.20	13.85	28.77	271.47	2.58	23.58	25.38
10.76	19.56	13.91	28.43	271.47	2.61	24.03	25.41
10.82	19.56	13.87	28.85	271.47	2.59	24.30	25.41
10.84	20.25	13.92	25.79	271.47	2.60	24.28	25.52
10.80	20.41	13.97	25.46	271.47	2.59	24.21	25.58
10.65	20.54	14.01	25.05	271.47	2.58	24.21	25.24
10.38	20.50	14.00	24.53	271.47	2.60	24.05	25.31
10.24	20.55	14.02	23.82	271.47	2.60	24.00	25.34
10.30	20.81	14.02	23.19	271.47	2.60	23.85	25.27
10.28	21.39	14.01	22.43	271.47	2.57	23.91	25.30
10.16	21.36	14.00	21.62	271.47	2.59	23.76	25.23
10.10	21.43	14.02	20.96	271.47	2.60	23.65	25.20
10.15	21.58	14.07	20.56	271.47	2.61	23.59	25.31
10.16	21.56	14.07	20.14	271.47	2.60	23.47	25.37
10.13	21.39	14.01	19.72	271.47	2.60	23.58	25.36
10.15	21.36	14.01	19.41	271.47	2.58	23.38	25.32
10.27	21.35	14.00	19.27	271.47	2.59	23.26	25.27
10.23	21.37	14.01	19.55	270.39	2.58	23.25	25.28
9.86	21.38	14.01	20.41	267.84	2.59	23.30	25.25
9.81	21.34	14.00	21.48	266.36	2.61	23.12	25.21
10.19	20.93	13.94	22.83	266.35	2.61	23.05	25.37
10.25	20.17	13.90	24.12	267.42	2.56	22.88	25.25
<b>Average Stack NOx, ppm (15% O2)</b>	<b>Average Stack CO, ppm (15% O2)</b>	<b>Average Stack O2 (%)</b>	<b>Average Duct Burner Gas Flow (MBCFH)</b>	<b>Average Turbine Gas Flow (MBCFH)</b>	<b>Ave. Steam Injection Rate (lbs)</b>	<b>Ave. Ammonia Injection (lb/hr)</b>	<b>Ave. Turbine Load (MWh)</b>
10.42	20.75	13.96	23.10	270.58	2.59	23.61	25.30

Avg NH3 = 23.40 ds/w  
Avg MWh = 25.30

4894.67 ct/m  
293.68 x 1000/60

**EPA METHOD 20 MEASUREMENT  
SYSTEM PERFORMANCE TIME**

**RESPONSE TIME**

DATE OF TEST: 3-3-2020

PROBE LOCATION: Stack

ANALYZER TYPE & MODEL #

NOx: AMI 200FH

CO: AMI 300EM

O2: TECOMEX 1400

Span Gas Concentration/Analyzer Full Scale Setting:

NOx; Gas, ppmv: 19.8

Full Scale setting, ppmv 25

CO; Gas, ppmv: 81.2

Full Scale setting, ppmv 100

O2; Gas, %: 19.9

Full Scale setting, % 25

UPSCALE TIME - Analyzer + Sampling System:

Trial #	Nox	CO	O2
1	<u>49</u>	<u>56</u>	<u>41</u> seconds
2	<u>50</u>	<u>56</u>	<u>41</u> seconds
3	<u>50</u>	<u>57</u>	<u>40</u> seconds
Average Response	<u>50</u>	<u>56</u>	<u>41</u> seconds

DOWNSCALE - Analyzer + Sampling System:

Trial #	Nox	CO	O2
1	<u>50</u>	<u>55</u>	<u>40</u> seconds
2	<u>50</u>	<u>55</u>	<u>40</u> seconds
3	<u>50</u>	<u>55</u>	<u>40</u> seconds
Average Response	<u>50</u>	<u>55</u>	<u>40</u> seconds

Slower Average 50 56 41 seconds



<b>DESCRIPTION OF METHOD(S) USED</b>
--------------------------------------



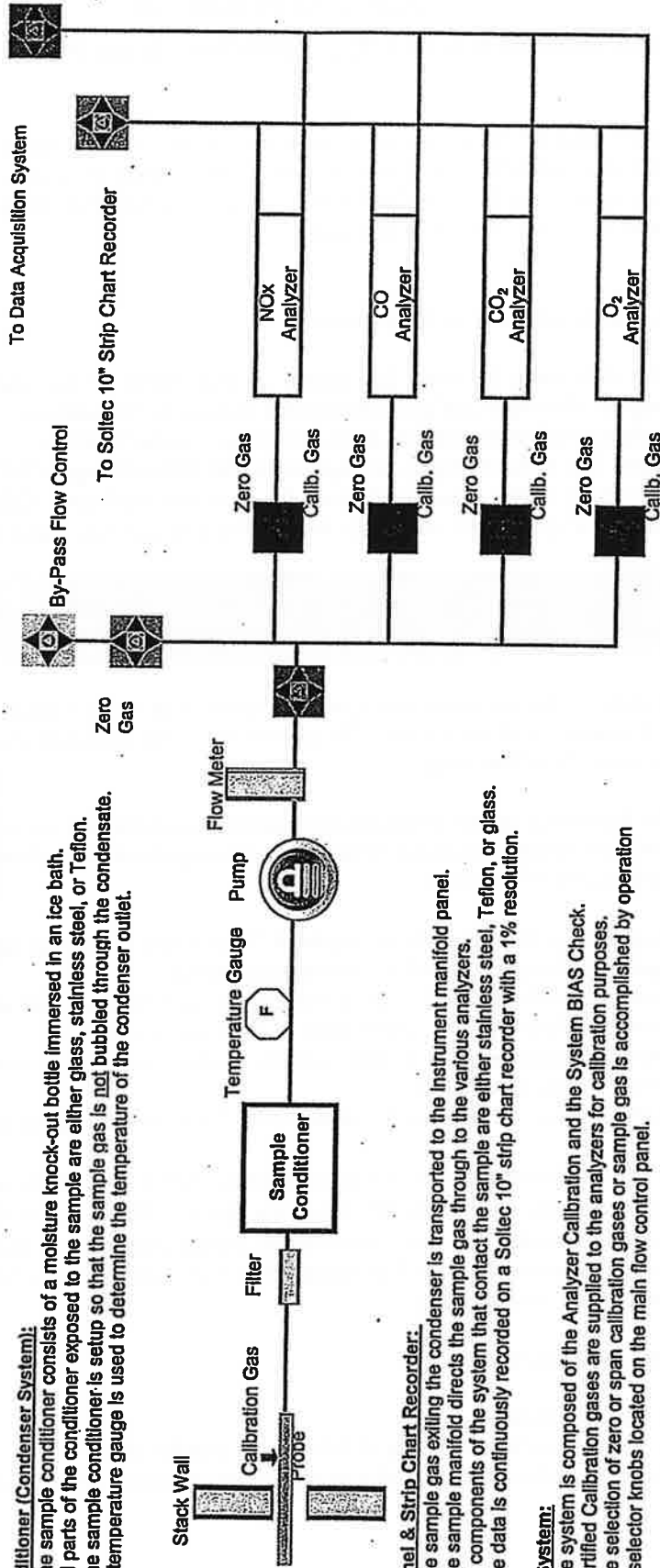
## Method 100 – Sample Train Assembly

### Probe:

1. AIRx Testing Services, Inc. uses a stainless steel sampling probe.
2. The probe is connected to the sample conditioner using a heated (if necessary ) Teflon sampling line.

### Sample Conditioner (Condenser System):

1. The sample conditioner consists of a moisture knock-out bottle immersed in an ice bath.
2. All parts of the conditioner exposed to the sample are either glass, stainless steel, or Teflon.
3. The sample conditioner is setup so that the sample gas is not bubbled through the condensate.
4. A temperature gauge is used to determine the temperature of the condenser outlet.



### Manifold Panel & Strip Chart Recorder:

1. The sample gas exiting the condenser is transported to the instrument manifold panel.
2. The sample manifold directs the sample gas through to the various analyzers.
3. All components of the system that contact the sample are either stainless steel, Teflon, or glass.
4. The data is continuously recorded on a Soltec 10" strip chart recorder with a 1% resolution.

### Calibration System:

1. The system is composed of the Analyzer Calibration and the System BIAS Check.
2. Certified Calibration gases are supplied to the analyzers for calibration purposes.
3. The selection of zero or span calibration gases or sample gas is accomplished by operation of selector knobs located on the main flow control panel.

**Nitrogen Oxides:** – Chemiluminescent Analyzer: Based on the chemiluminescent reaction of NO and ozone to form NO<sub>2</sub> in an excited state. Light emission is monitored through an optical filter by a high sensitivity photomultiplier tube, the output of which is electronically processed so it is linearly proportional to the NO concentration. The output is in units of ppmv.

**Carbon Monoxide** – Non-Dispersive Infrared (NDIR) Analyzer: Radiation from an infrared source is passed through a narrow band-pass filter and a multiple optical pass sample cell where absorption by the sample gas occurs. The infrared radiation exits the sample cell and falls on a solid state infrared detector. The output is in units of ppmv.

**Oxygen** – Electrochemical Analyzer: Oxygen in the flue gas sample diffuses through a Teflon membrane and is reduced on the surface of the cathode. A corresponding oxidation occurs at the anode and an electric current proportional to the concentration of oxygen is produced. The output is in units of percent O<sub>2</sub> by volume.

**Carbon Dioxide** – Non-Dispersive Infrared (NDIR) Analyzer: The instrument measures the differential in Infrared energy absorbed from energy beams passed through a reference cell (containing a gas selected to have minimal absorption of Infrared energy in the wavelength absorbed by CO<sub>2</sub>) and a sample cell through which the sample gas flows continuously. The output is in units of percent CO<sub>2</sub> by volume.

# EPA Method 20

## NO<sub>x</sub>, SO<sub>2</sub>, and Diluent (O<sub>2</sub> or CO<sub>2</sub>) Emissions from Stationary Gas Turbines

**Principle:** A sample of an exhaust gas stream is continuously extracted, conditioned, and conveyed to instrumental analyzers for the determination of NO<sub>x</sub> and diluent content. During each NO<sub>x</sub> and diluent determination, a separate measurement of SO<sub>2</sub> emissions is made, using Method 6 or its equivalent. The diluent determination is used to adjust the NO<sub>x</sub> and SO<sub>2</sub> concentration to a reference condition.

### Measurement System: Performance Test Procedures

**Calibration check:** The difference between the known concentration of the CalGas and the gas concentration exhibited by the gas analyzer when the CalGas is introduced directly to the analyzer.

- 1) Calibrate the analyzer with zero and mid-level (45-55% of range) CalGas
- 2) Introduce low-level (20-30% of range) and high-level (80-90% of range) CalGas

**Performance Spec:** The linear curve determined from the zero and mid-level CalGas responses must predict the actual response of the low-level (NO<sub>x</sub> only) and high-level (NO<sub>x</sub> and O<sub>2</sub>/CO<sub>2</sub>) gases within 2% of the range.

**Sampling system BIAS:** The difference between the gas concentrations exhibited by the measurement system when CalGas is introduced at the sampling probe tip filter and when the same CalGas is introduced directly to the analyzer.

**Performance Spec:** less than 5% of the range for the zero, mid-range, and high-range CalGas.

**Zero Drift:** The difference in the measurement system responses at a zero concentration level during the initial calibration, and final calibration check after a test. No adjustment to the measurement system is allowed at that point.

**Performance Spec:** less than 2% of the range

**Calibration Drift:** The difference in the measurement system responses at a mid-range concentration level during the initial calibration, and final calibration check after a test. No adjustment is allowed at that point.

**Performance Spec:** less than 2% of the range

**Response time:** Time required by data recorder to display 95% of a step change in gas concentration.

- 1) Introduce zero gas into the system until all readings are stable.
- 2) Switch to monitor stack effluent until a stable reading can be obtained. Record upscale response time.
- 3) Introduce high-level CalGas into the system until all readings are stable.
- 4) Switch to monitor stack effluent until a stable reading can be obtained. Record downscale response time.
- 5) Repeat the previous 4 steps three times

**Performance Spec:** No greater than 30 seconds (or change of < 5% of the measured average concentration for 2 min)

**Interference response:** The output response of the measurement system to a component in the sample gas, other than the gas component being measured. Introduce the following gases, 500±50 ppm CO, 200±20 ppm SO<sub>2</sub>, 10±1 ppm CO<sub>2</sub>, 20.9±1 ppm O<sub>2</sub>, and determine the total interference output response of the system to these components. Conduct the interference response check on each analyzer prior to its first use in the field.

**Performance Spec:** less than 2% of the range

### Emission Measurement Test Procedures

- Select sampling site as follows:
  1. Upstream of the point of introduction of dilution air into the duct;
  2. At least 2 stack diameters (or 5 feet whichever is less) upstream of stack outlet.

- Conduct preliminary O<sub>2</sub>/CO<sub>2</sub> traverse to determine the sampling points of lowest O<sub>2</sub> or highest CO<sub>2</sub> concentration. Conduct this test at the turbine's lowest operating load mentioned in the test protocol.
  - Select minimum # of points:
    1. 8 for stacks with cross-sectional areas < 1.5 m<sup>2</sup> (16.1 ft<sup>2</sup>)
    2. 8 + 1 additional sample point per each 0.2m<sup>2</sup> (2.2ft<sup>2</sup>) of areas for stacks whose areas 16.1ft<sup>2</sup> < A < 107.6ft<sup>2</sup>
    3. 49 (48 if circular stacks) for stacks whose cross-sectional areas are > 10.0 m<sup>2</sup> (107.6 ft<sup>2</sup>)
    4. Use Method 1 to locate the traverse points
  - Conduct preliminary diluent measurement while the turbine is operating at the lowest percent of peak load:
    1. Position probe at first traverse point and begin sampling for at least 1 minute + response time
    2. Do the same for each traverse point, recording the diluent concentration each time
    3. Select the 8 points at which the lowest O<sub>2</sub> (or highest CO<sub>2</sub>) concentrations were obtained
    4. Sample at each of these selected points during each run at the different turbine load conditions
  - Three test runs at each load condition specified in the test protocol constitutes a complete test
- Cleaning of sample train: Flush probe, lines and sample conditioner with DW, than acetone. Dry with filtered dry air.
  - Allow Continuous Analyzers to warm up
  - Sampling system preparation: assemble sample train as shown in Fig 100.1-1, 100.1-2 and 100.1-3. Leak check the vacuum side of the assembly to a minimum of 20" of Hg (gauge). The sampling system should hold 20" of Hg vacuum for 5 minutes with less than 1" Hg loss. Check the pressure side of the system with liquid soap solution and correct any leaks.
  - Allowable modifications: probe heating element can be eliminated if stack is at or below ambient temperature and condensation is not observed. Pitot tube can be eliminated if only concentration measurements are required.
  - Calibrate analyzers and data recorders: introduce CalGases directly to the instruments and make all necessary adjustments to calibrate the analyzer and data recorder. Adjust system components to achieve manufacturer's recommended sampling rates.
  - Instrument response time: establish during semi-annual certification
  - Sampling system BIAS check: Mandatory
    1. Backflash gas through the probe as necessary to prevent particulate buildup
    2. Zero, and either mid-range or high-range (whichever is closest to effluent concentration)
    3. Introduce upscale CalGas and record concentration on a form similar to 100.1-5
    4. Introduce zero CalGas and record concentration
    5. Make no adjustments to the system except those necessary to achieve the correct flow rate.
    6. If invalid calibration is exhibited (> 5% of the range), take corrective action and repeat check.
    7. If adjustment to the analyzer is required, first repeat the analyzer calibration error check, then repeat the sampling system BIAS check.
  - NO<sub>2</sub> to NO conversion check: EPA Method 20 or gas mixture of NO<sub>2</sub> in air

### Emission Test Procedure:

- Traverse stack to determine presence of stratification
- Single-point gas sampling is acceptable if gas composition is homogenous (<10% variation)
- Determine moisture content and velocity pressures or Mass flow rate may be obtained by stoichiometric and gas composition relations
- Chart recorder label: turn on strip chart recorder and label the chart as to pollutant, source, range, calibration cylinder ID number, certified expiration date, zero and upper range calibration settings, chart speeds, date, time, operator.
- Sample probe traverse and minimum sampling time:
  1. Insert probe in stack
  2. determine if single point sampling is acceptable
  3. if traverse is required, leave the probe at each traverse point for at least the system response time + 1 minute.
  4. minimum sampling time of 60 minute is recommended. See District Rules and Regulations and permit conditions for special requirements.
  5. When test duration exceeds one hour, conduct zero and span checks every 2 hours. Adjust settings as necessary, mark strip charts and record in log books.
- Zero and Calibration DRIFT Tests:
  1. Immediately preceding and following each run, or if adjustments are necessary during the run, repeat the sampling system BIAS procedure. Make no adjustments to the system until after the DRIFT checks are complete. Record the information on a form similar to Figure 100.1-5.
  2. If run is invalid (sampling system BIAS specs exceeded), repeat entire procedure before repeating run.
  3. If both the zero and upscale calibration values are within the sampling system BIAS specs, then use the average of the initial and final BIAS check values to calculate the gas concentration for the run.
  4. If the zero or upscale calibration DRIFT exceeds the DRIFT limits, repeat entire procedure before conducting additional runs.
- Post Run Leak Check:

**INSTRUMENT INFORMATION**





## SOURCE EMISSION INSTRUMENTATION LIST

### OXIDES OF NITROGEN

<p><b>Unit No. - 1:</b>            Manufacturer: API            Model No.: 200 EH            Serial No.: 233            Method: Chemiluminescence            Range (ppmv) 0-5000</p>	<p><b>Unit No. - 6:</b>            Manufacturer: API            Model No.: 200 A            Serial No.: 1013            Method: Chemiluminescence            Range (ppmv) 0-50</p>
<p><b>Unit No. - 2:</b>            Manufacturer: API            Model No.: 200 EH            Serial No.: 234            Method: Chemiluminescence            Range (ppmv) 0-5000</p>	<p><b>Unit No. - 7:</b>            Manufacturer: Thermo Environmental (TECO)            Model No.: 10AR            Serial No.: 25559-221            Method: Chemiluminescence            Range (ppmv) 0-2.5, 10, 25, 100, 250, 1000, 2500, 10000</p>
<p><b>Unit No. - 3:</b>            Manufacturer: API            Model No.: 200 EH            Serial No.: 109            Method: Chemiluminescence            Range (ppmv) 0-5000</p>	<p><b>Unit No. - 8:</b>            Manufacturer: Thermo Environmental (TECO)            Model No.: 10AR            Serial No.: 38586-258            Method: Chemiluminescence            Range (ppmv) 0-2.5, 10, 25, 100, 250, 1000, 2500, 10000</p>
<p><b>Unit No. - 4:</b>            Manufacturer: API            Model No.: 200 EH            Serial No.: 442            Method: Chemiluminescence            Range (ppmv) 0-5000</p>	
<p><b>Unit No. - 5:</b>            Manufacturer: API            Model No.: 200 EH            Serial No.: 441            Method: Chemiluminescence            Range (ppmv) 0-5000</p>	



## SOURCE EMISSION INSTRUMENTATION LIST

### OXYGEN

<p><b><u>Unit No. - 5:</u></b>                      Manufacturer: Teledyne                      Model No.: 320-AX                      Serial No.: 108743                      Method: Electrochemical                      Range (%) 0-5, 10, 25</p>	<p><b><u>Unit No. - 13:</u></b>                      Manufacturer: Servomex                      Model No.: 1400                      Serial No.: X1420/B707                      Method: Paramagnetic                      Range (%) 0-25</p>
<p><b><u>Unit No. - 7:</u></b>                      Manufacturer: Teledyne                      Model No.: 320-AX                      Serial No.: 108742                      Method: Electrochemical                      Range (%) 0-5, 10, 25</p>	
<p><b><u>Unit No. - 9:</u></b>                      Manufacturer: Servomex                      Model No.: 1400                      Serial No.: 01420/B701/730                      Method: Paramagnetic                      Range (%) 0-25, 100</p>	
<p><b><u>Unit No. - 10:</u></b>                      Manufacturer: Servomex                      Model No.: 1400                      Serial No.: 01420/B308                      Method: Paramagnetic                      Range (%) 0-25</p>	
<p><b><u>Unit No. - 11:</u></b>                      Manufacturer: Teledyne                      Model No.: 320-A                      Serial No.: 111211                      Method: Electrochemical                      Range (%) 0-5, 10, 25</p>	
<p><b><u>Unit No. - 12:</u></b>                      Manufacturer: Servomex                      Model No.: 1400                      Serial No.: 01420/B7103                      Method: Paramagnetic                      Range (%) 0-25, 100</p>	



## SOURCE EMISSION INSTRUMENTATION LIST

### CARBON MONOXIDE

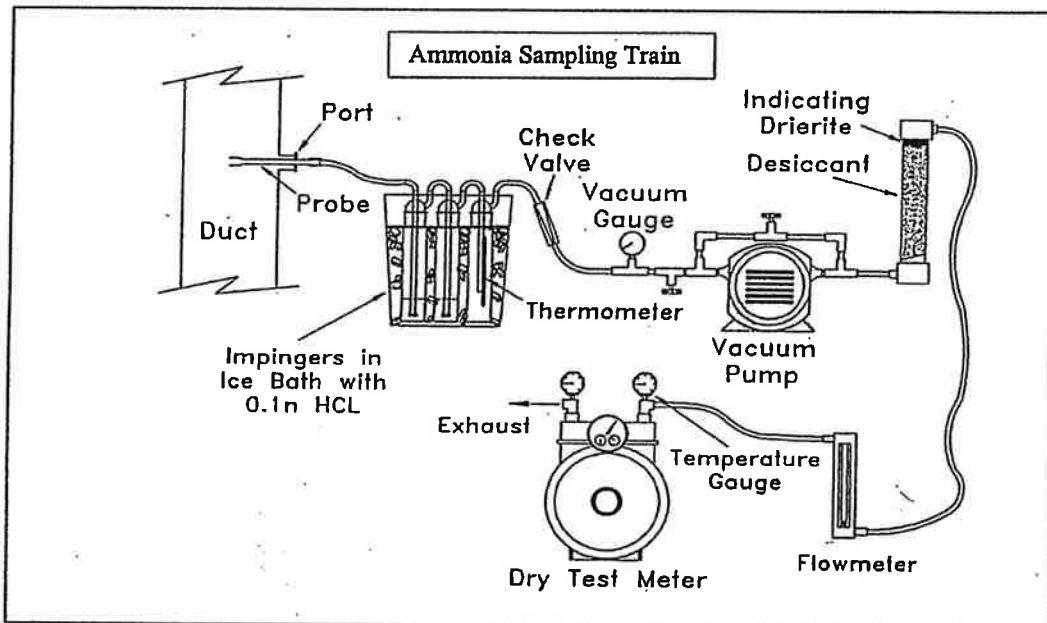
<b>Unit No. - 1:</b> Manufacturer: API Model No.: 300 EM Serial No.: 239 Method: NDIR/GFC Range (ppmv) 0-5, 10, 25, 50, 100, 250, 500, 1000, 2500, 5000	<b>Unit No. - 2:</b> Manufacturer: API Model No.: 300 EM Serial No.: 240 Method: NDIR/GFC Range (ppmv) 0-5, 10, 25, 50, 100, 250, 500, 1000, 2500, 5000
<b>Unit No. - 3:</b> Manufacturer: API Model No.: 300 EM Serial No.: 104 Method: NDIR/GFC Range (ppmv) 0-5, 10, 25, 50, 100, 250, 500, 1000, 2500, 5000	<b>Unit No - 5:</b> Manufacturer: Thermo Environmental (TECO) Model No.: 48H Serial No.: 25184-219 Method: NDIR/GFC Range (ppmv) 0-50, 100, 200, 500, 1000, 2000, 5000, 10000, 20000, 50000
<b>Unit No. - 6:</b> Manufacturer: Thermo Environmental (TECO) Model No.: 48H Serial No.: 29031-233 Method: NDIR/GFC Range (ppmv) 0-50, 100, 200, 500, 1000, 2000, 5000, 10000, 20000, 50000	<b>Unit No. - 7:</b> Manufacturer: Siemens Model No.: Ultramat 21p Serial No.: AO4-254 Method: NDIR Range (ppmv) 0-300
<b>Unit No. - 10:</b> Manufacturer: Thermo Environmental (TECO) Model No.: 48H Serial No.: 38391-257 Method: NDIR/GFC Range (ppmv) 0-50, 100, 200, 500, 1000, 2000, 5000, 10000, 20000, 50000	<b>Unit No. - 11:</b> Manufacturer: Thermo Environmental (TECO) Model No.: 48H Serial No.: 35226-249 Method: NDIR/GFC Range (ppmv) 0-50, 100, 200, 500, 1000, 2000, 5000, 10000, 20000, 50000
<b>Unit No - 13:</b> Manufacturer: Thermo Environmental (TECO) Model No.: 48 Serial No.: 48-15970-159 Method: NDIR/GFC Range (ppmv) 0-1, 2, 5, 10, 20, 50, 100, 200, 500, 1000	<b>Unit No - 14:</b> Manufacturer: Thermo Environmental (TECO) Model No.: 48 Serial No.: 48-23925-213 Method: NDIR/GFC Range (ppmv) 0-1, 2, 5, 10, 20, 50, 100, 200, 500, 1000

## BAAQMD Method ST-1B / Ammonia Integrated Sampling

**Principle:** A gas sample is drawn through a solution of 0.1N hydrochloric acid which absorbs the ammonia.

### Pre-Test Procedures:

- ❖ Add 100 ml of 0.1N to each of two impingers; retain 100 ml of the HCl to analyze as a blank
- ❖ Leak-test sampling train by starting the pump, plugging the probe, and adjusting the pump inlet vacuum to 10 inches Hg. The leak rate must not exceed 0.6 liter/min (0.02 CFM). Release plug, stop pump.
- ❖ Record initial "dry test meter" reading and barometric pressure.
- ❖ In the absence of stratification, sample at single point, otherwise select sampling traverse points.



### Sampling Procedure:

- ❖ Each test run shall be of **30 minute** duration or 90% of the batch time, whichever is less
- ❖ Position probe at the sampling point and start the pump
- ❖ Sample at constant rate of **14.3 liter/min (0.5 CFM)**, using rotameter to establish initial rate only
- ❖ Record "dry test meter" volume and temperature and "impinger outlet" temperature at 5-min intervals
- ❖ Maintain impinger temperature at 7°C (45°F) or less by adding ice as necessary
- ❖ At the conclusion of each run, stop pump, remove probe from stack and record final reading
- ❖ Point probe upward and purge sample train with ambient air

**Analysis:** Individually analyze the hydrochloric acid solutions and the blank for total ammonia content.

### Calculations:

Standard sample volume	Ammonia Concentration
$V_o = (17.71)V_m P_b / T_m$	$C = 5.02 \times 10^4 W / V_o$
<p><u>Where:</u>  <math>V_o</math> = Corrected sample volume to std conditions;  <math>T_m</math> = Average run meter temperature (°R);  <math>V_m</math> = Uncorrected meter volume (ft<sup>3</sup>);  <math>P_b</math> = Barometric pressure (inches Hg);                      17.71 = Constant correcting to 70°F &amp; 29.92 in.Hg.</p>	<p><u>Where:</u>  <math>C</math> = Ammonia concentration, ppmv on a dry basis;  <math>W</math> = Total weight of ammonia in the impinger catch, for each run, (g);  <math>5.02 \times 10^4</math> = Constant derived from the MW and correcting to standard conditions.</p>

**QUALITY ASSURANCE**





DocNumber: 228963



Praxair Distribution, Inc.  
5700 S. Alameda Street  
Los Angeles CA 90058  
Tel: 323-585-2154  
Fax: 714-542-6689  
PGVP ID: F22018

## CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

**Customer & Order Information**

PRAXAIR PKG OXNARD CA HPS  
455 E WOOLEY RD  
OXNARD CA 93030

Certificate Modification Date: 11/29/2018

Praxair Order Number: 70784150

Part Number: NI NO12ME-AS

Fill Date: 11/08/2018

Lot Number: 70088831006

Cylinder Style & Outlet: AS

CGA 660

Cylinder Pressure and Volume: 2000 psig 140 H3

**Certified Concentration**

Expiration Date:	11/20/2021	NIST Traceable
Cylinder Number:	CC99748	Expanded Uncertainty
<b>12.12 ppm</b>	<b>Nitric oxide</b>	<b>± 0.7 %</b>
<b>Balance</b>	<b>Nitrogen</b>	

**ProSpec EZ Cert**



**For Reference Only:** NOx 12.18 ppm

**Certification Information:** Certification Date: 11/20/2018 Term: 36 Months Expiration Date: 11/20/2021

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1.  
Do Not Use this Standard if Pressure is less than 100 PSIG.

**Analytical Data:**

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

1. Component: Nitric oxide

Requested Concentration: 12 ppm  
Certified Concentration: 12.12 ppm  
Instrument Used: Thermo Electron 42i-LS S/N 1030845077  
Analytical Method: Chemiluminescence  
Last Multipoint Calibration: 11/20/2018

Reference Standard: Type / Cylinder #: GMIS / CC87780

Concentration / Uncertainty: 9.98 ppm ±0.51%  
Expiration Date: 10/30/2019  
Traceable to: SRM # / Sample # / Cylinder #: PRMNC1170510.01 / NA / APEX1161172  
SRM Concentration / Uncertainty: 10.00 / 0.05  
SRM Expiration Date: 01/27/2019

First Analysis Data:				Date	11/13/2018
Z:	0	R:	9.98	C:	12.18
Conc:	12.17	Z:	0	C:	12.16
Conc:	12.15	R:	9.99	C:	12.18
Conc:	12.18				
UOM:	ppm	Mean Test Assay:		12.17	ppm

Second Analysis Data:				Date	11/20/2018
Z:	0	R:	9.98	C:	12.07
Conc:	12.07	Z:	0	C:	12.08
Conc:	12.08	R:	9.99	C:	12.08
Conc:	12.08				
UOM:	ppm	Mean Test Assay:		12.07	ppm

Analyzed By

Henry Koung (D.V.)  
Henry Koung

Certified By

Amalia Romo  
Amalia Romo

Information contained herein has been prepared at your request by qualified experts within Praxair Distribution, Inc. While we believe that the information is accurate within the limits of the analytical methods employed and is complete to the extent of the specific analyses performed, we make no warranty or representation as to the suitability of the use of the information for any purpose. The information is offered with the understanding that any use of the information is at the sole discretion and risk of the user. In no event shall the liability of Praxair Distribution, Inc., arising out of the use of the information contained herein exceed the fee established for providing such information.



**Praxair**  
 5700 South Alameda Street  
 Los Angeles, CA 90058  
 Tel: (323) 585-2154 Fax: (714) 542-6689  
 PGVPID: F22017

DocNumber: 000112832

**CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS**

**Customer & Order Information:**

PRAXAIR PKG OXNARD CA HPS  
 455 E WOOLEY RD  
 OXNARD CA 93030

Praxair Order Number: 70319550  
 Customer P. O. Number:  
 Customer Reference Number:

Fill Date: 7/14/2017  
 Part Number: NI NO20ME-AS  
 Lot Number: 70086719512  
 Cylinder Style & Outlet: AS CGA 660  
 Cylinder Pressure & Volume: 2000 psig 140 cu. ft.

**Certified Concentration:**

Expiration Date:	8/1/2020	NIST Traceable
Cylinder Number:	CC27837	Analytical Uncertainty:
19.7 ppm	NITRIC OXIDE	± 1 %
Balance	NITROGEN	

NOx = 19.8 ppm

NOx for Reference Only

**Certification Information:** Certification Date: 8/1/2017 Term: 36 Months Expiration Date: 8/1/2020

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Do Not Use this Standard if Pressure is less than 100 PSIG.

**Analytical Data:**

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

**1. Component: NITRIC OXIDE**

Requested Concentration: 20 ppm  
 Certified Concentration: 19.7 ppm  
 Instrument Used: Thermo Electron 42i-LS S/N 1030645077  
 Analytical Method: Chemiluminescence  
 Last Multipoint Calibration: 7/21/2017

Reference Standard Type: GMS  
 Ref. Std. Cylinder #: CC457593  
 Ref. Std. Conc: 20.07 ppm  
 Ref. Std. Traceable to SRM #: 2629a  
 SRM Sample #: 50-G-17  
 SRM Cylinder #: FF31691

<b>First Analysis Data:</b>		<b>Date:</b> 7/25/2017	
Z: 0	R: 20.1	C: 19.79	Conc: 19.76
R: 20.1	Z: 0	C: 19.78	Conc: 19.75
Z: 0	C: 19.78	R: 20.1	Conc: 19.75
UOM: ppm	Mean Test Assay: 19.754 ppm		

<b>Second Analysis Data:</b>		<b>Date:</b> 8/1/2017	
Z: 0	R: 20.1	C: 19.72	Conc: 19.691
R: 20.1	Z: 0	C: 19.7	Conc: 19.671
Z: 0	C: 19.71	R: 20.1	Conc: 19.681
UOM: ppm	Mean Test Assay: 19.681 ppm		

Analyzed by:   
 Amalia Real

Certified by:   
 Henry Koung

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**Praxair**  
 5700 South Alameda Street  
 Los Angeles, CA 90058  
 Tel: (323) 585-2154 Fax: (714) 542-6689  
 PGVPID: F22017

DocNumber: 000116258

**CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS**

**Customer & Order Information:**

PRAXAIR PKG OXNARD CA HPS  
 455 E WOOLEY RD  
 OXNARD CA 93030

Praxair Order Number: 70394045  
 Customer P. O. Number:  
 Customer Reference Number:

Fill Date: 10/16/2017  
 Part Number: EV NICDOXE90-AS  
 Lot Number: 70086728905  
 Cylinder Style & Outlet: AS CGA 590  
 Cylinder Pressure & Volume: 2000 psig 140 cu. ft.

**Certified Concentration:**

Expiration Date:	10/20/2025	NIST Traceable
Cylinder Number:	SA17161	Analytical Uncertainty:
4.01 %	CARBON DIOXIDE	± 0.5 %
12.11 %	OXYGEN	± 0.3 %
Balance	NITROGEN	

**Certification Information:** Certification Date: 10/20/2017 Term: 96 Months Expiration Date: 10/20/2025  
 This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Do Not Use this Standard if Pressure is less than 100 PSIG.

CO2 responses have been corrected for O2 IR broadening effect. O2 responses have been corrected for CO2 interference.

**Analytical Data:** (R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

**1. Component: CARBON DIOXIDE**

Requested Concentration: 4 %  
 Certified Concentration: 4.01 %  
 Instrument Used: Horiba VIA-510 S/N 20C194WK  
 Analytical Method: NDIR  
 Last Multipoint Calibration: 10/12/2017

Reference Standard Type: GMIS  
 Ref. Std. Cylinder #: DT0008914  
 Ref. Std. Conc: 7.00 %  
 Ref. Std. Traceable to SRM #: 1674b  
 SRM Sample #: 7-H-07  
 SRM Cylinder #: FF10631

<b>First Analysis Data:</b>		<b>Date:</b> 10/20/2017	
Z: 0	R: 7	C: 4.02	Conc: 4.003
R: 7.04	Z: 0	C: 4.03	Conc: 4.013
Z: 0	C: 4.03	R: 7.05	Conc: 4.013
UOM: %	Mean Test Assay: 4.009 %		

<b>Second Analysis Data:</b>		<b>Date:</b>	
Z: 0	R: 0	C: 0	Conc: 0
R: 0	Z: 0	C: 0	Conc: 0
Z: 0	C: 0	R: 0	Conc: 0
UOM: %	Mean Test Assay: 0 %		

**2. Component: OXYGEN**

Requested Concentration: 12 %  
 Certified Concentration: 12.11 %  
 Instrument Used: PARA 1 OXYMAT 5E  
 Analytical Method: PARAMAGNETIC  
 Last Multipoint Calibration: 9/25/2017

Reference Standard Type: GMIS  
 Ref. Std. Cylinder #: CC81686  
 Ref. Std. Conc: 14.96 %  
 Ref. Std. Traceable to SRM #: 2559a  
 SRM Sample #: 71-E-19  
 SRM Cylinder #: FF22331

<b>First Analysis Data:</b>		<b>Date:</b> 10/20/2017	
Z: 0	R: 14.96	C: 12.11	Conc: 12.105
R: 14.96	Z: 0	C: 12.11	Conc: 12.105
Z: 0	C: 12.13	R: 14.98	Conc: 12.125
UOM: %	Mean Test Assay: 12.111 %		

<b>Second Analysis Data:</b>		<b>Date:</b>	
Z: 0	R: 0	C: 0	Conc: 0
R: 0	Z: 0	C: 0	Conc: 0
Z: 0	C: 0	R: 0	Conc: 0
UOM: %	Mean Test Assay: 0 %		

Analyzed by:

Jose Vasquez

Certified by:

Jenna Lockman

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AIR LIQUIDE

Air Liquide America  
Specialty Gases LLC



Intertek

# RATA CLASS

Guaranteed +/- 1% Accuracy

8832 DICE ROAD, SANTA FE SPRINGS, CA 90670-2516

Phone: 800-323-2212

Fax: 562-464-5262

## CERTIFICATE OF ACCURACY: EPA Protocol Gas

**Assay Laboratory - PGVP Vendor ID: A52013**

AIR LIQUIDE AMERICA SPECIALTY GASES LLC  
8832 DICE ROAD  
SANTA FE SPRINGS, CA 90670-2516

P.O. No.: AIRX-FRESNO  
Document #: 53195873-007

**Customer**

ALA-CYL-UNION CITY (LOC 84227)  
TRANSFER ACCOUNT  
700 DECOTO ROAD  
UNION CITY CA 94587  
US

**ANALYTICAL INFORMATION Gas Type : CO2,O2,BALN**

This certification was performed according to EPA Traceability Protocol For Assay & Certification of Gaseous Calibration Standards; Procedure G-1. EPA/600/R-12/531; May 2012. Do not use this standard if pressure is less than 100 psig.

Cylinder Number: ALM024672      Certification Date: 02Dec2013      Exp. Date: 03Dec2021  
Cylinder Pressure: 2000 PSIG      Batch No: SBO0081471

COMPONENT	CERTIFIED CONCENTRATION (Moles)		ACCURACY (ABSOLUTE / RELATIVE)			
	Value	%	Value	%	Value	%
CARBON DIOXIDE	8.14	%	0.05	%	0.6	%
OXYGEN	19.9	%	0.13	%	0.7	%
NITROGEN	BALANCE					

**TRACEABILITY**

**REFERENCE STANDARD**

COMPONENT	CONCENTRATION	UNCERTAINTY	CYLINDER	TYPE/SRM SAMPLE	EXP. DATE
CARBON DIOXIDE	7.0160 %	0.0350 %	K003719	NTRM 1674	03Feb2016
OXYGEN	20.8500 %	0.1300 %	K000461	NTRM 2659/020500	14May2018

**ANALYTICAL METHOD**

1st Analysis: 02Dec2013

COMPONENT	INSTRUMENT	ANALYTICAL/PRINCIPLE	CALIBRATED	CONCENTRATION
CARBON DIOXIDE	VARIAN 8/3400/2808	FID & TCD	02Dec2013	8.136 %
OXYGEN	VARIAN 8/3400/2806	FID & TCD	25Nov2013	19.93 %

APPROVED BY:

*[Signature]*  
DC



Praxair  
 5700 South Alameda Street  
 Los Angeles, CA 90058  
 Tel: (323) 585-2154 Fax: (714) 542-6689  
 PGPVID: F22017

DocNumber: 000105446

**CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS**

**Customer & Order Information:**

PRAXAIR PKG OXNARD CA HPS  
 455 E WOOLEY RD  
 OXNARD CA 93030

Praxair Order Number: 70207603  
 Customer P. O. Number:  
 Customer Reference Number:

Fill Date: 2/22/2017  
 Part Number: NI CO4DME-AS  
 Lot Number: 109705308  
 Cylinder Style & Outlet: AS CGA 350  
 Cylinder Pressure & Volume: 2000 psig 140 cu. ft.

**Certified Concentration:**

Expiration Date:	3/7/2025	NIST Traceable
Cylinder Number:	CC272657	Analytical Uncertainty:
40.0 ppm	CARBON MONOXIDE	± 0.5 %
Balance	NITROGEN	

**Certification Information:** Certification Date: 3/7/2017 Term: 96 Months Expiration Date: 3/7/2025  
 This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Do Not Use this Standard if Pressure is less than 100 PSIG.

**Analytical Data:**

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

1. Component: CARBON MONOXIDE

Requested Concentration: 40 ppm  
 Certified Concentration: 40.0 ppm  
 Instrument Used: Horiba VIA-510 S/N 576876015  
 Analytical Method: NDIR  
 Last Multipoint Calibration: 3/1/2017

Reference Standard Type: GMIS  
 Ref. Std. Cylinder #: CC188877  
 Ref. Std. Conc: 50.3 ppm  
 Ref. Std. Traceable to SRM #: 1878c  
 SRM Sample #: 04-1-41  
 SRM Cylinder #: FF18402

First Analysis Data:				Date:			
Z:	0	R:	50.2	C:	39.8	Conc:	40.012
R:	50	Z:	0	C:	39.8	Conc:	40.012
Z:	0	C:	39.8	R:	49.9	Conc:	40.012
UOM:	ppm	Mean Test Assay:		40.012 ppm			

Second Analysis Data:				Date:			
Z:	0	R:	0	C:	0	Conc:	0
R:	0	Z:	0	C:	0	Conc:	0
Z:	0	C:	0	R:	0	Conc:	0
UOM:	ppm	Mean Test Assay:		0 ppm			

Analyzed by:

Certified by:

Nassim Haddad



DocNumber: 253976



Praxair Distribution, Inc.  
5700 S. Alameda Street  
Los Angeles CA 90058  
Tel: 323-585-2154  
Fax: 714-542-6689  
PGVP ID: F22019

## CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

**Customer & Order Information**

PRAXAIR PKG OXNARD CA HPS  
455 E WOOLEY RD  
OXNARD CA 93030

Certificate Issuance Date: 06/27/2019

Praxair Order Number: 70998288

Part Number: NI CO80ME-AS

Customer PO Number: 78981976

Fill Date: 06/13/2019

Lot Number: 70086916403

Cylinder Style & Outlet: AS

CGA 350

Cylinder Pressure and Volume: 2000 psig 140 ft3

**Certified Concentration**

Expiration Date:	06/18/2027	NIST Traceable
Cylinder Number:	EB0020337	Expanded Uncertainty
81.2 ppm	Carbon monoxide	± 0.4 %
Balance	Nitrogen	

**ProSpec EZ Cert**



**Certification Information:**

Certification Date: 06/18/2019

Term: 96 Months

Expiration Date: 06/18/2027

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1.

Do Not Use this Standard if Pressure is less than 100 PSIG.

**Analytical Data:**

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

1. Component:

Carbon monoxide

Requested Concentration: 80 ppm  
 Certified Concentration: 81.2 ppm  
 Instrument Used: Horiba VIA-510 S/N 576876015  
 Analytical Method: NDIR  
 Last Multipoint Calibration: 06/05/2019

Reference Standard:

Type / Cylinder #: SRM / FF28593

Concentration / Uncertainty: 98.40 ppm ±0.4095%

Expiration Date: 01/28/2020

Traceable to: SRM # / Sample # / Cylinder #: SRM 1679c / 3-J-45 / FF28593

SRM Concentration / Uncertainty: 98.40 PPM / ±0.40 PPM

SRM Expiration Date: 01/28/2020

First Analysis Data:		Date	
Z: 0	R: 98.4	C: 81.2	Conc: 81.2
R: SR4...	Z: 0	C: 81.2	Conc: 81.2
Z: 0	C: 81.3	R: 98.4	Conc: 81.3
UOM: ppm		Mean Test Assay: 81.2 ppm	

Second Analysis Data:		Date	
Z: 0	R: 0	C: 0	Conc: 0
R: 0	Z: 0	C: 0	Conc: 0
Z: 0	C: 0	R: 0	Conc: 0
UOM: ppm		Mean Test Assay: ppm	

Analyzed By

Brandon Aguilar

Certified By

Jose Vasquez

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**DRY GAS METER CALIBRATION**

Standard Pressure  
Standard Temperature  
Ambient pressure  
Ambient temperature

29.92 in. hg.  
60 F  
30.02 in. hg.  
59 F

Unit Number J  
Date: 1/7/2020  
Leak Check: .004 @ 20"

ΔH in. H2O	TIME min.	WET GAS VOL. cf	DRY GAS VOL. in/out cf	Temperature				*Y	†ΔH@ in. H2O
				W.G. AVG F	D.G. IN F	D.G. OUT F	D.G. AVG. F		
0.75	9.95	5.000	38.538		61.0	59.0	60.0	1.0043	1.6475
			43.498	61.0	61.0	59.0			
0.75	9.98	5.000	43.498		62.0	60.0	61.0	1.0078	1.6542
			48.450	61.0	62.0	60.0			
0.75	9.98	5.000	48.450		62.0	60.0	61.3	1.0027	1.6535
			53.430	61.0	62.0	61.0			
1.50	7.30	5.000	53.732		61.0	60.0	60.8	1.0108	1.7710
			58.658	61.0	61.0	61.0			
1.50	7.32	5.000	58.658		62.0	61.0	61.5	1.0098	1.7782
			63.596	61.0	62.0	61.0			
1.50	7.32	5.000	63.596		63.0	61.0	62.3	1.0119	1.7790
			69.374	61.5	64.0	61.0			
2.25	5.92	5.000	74.304		63.0	62.0	62.5	1.0108	1.7446
			74.939	61.5	63.0	62.0			
2.25	5.92	5.000	79.868		63.0	62.0	62.5	1.0154	1.7479
			84.770	62.0	63.0	62.0			
2.25	5.95	5.000	84.770		63.0	62.0	62.5	1.0133	1.7657
			89.682	62.0	63.0	62.0			
3.00	5.18	5.000	90.413		64.0	62.0	63.0	1.0138	1.7895
			95.309	63.0	63.0	63.0			
3.00	5.18	5.000	95.309		64.0	62.0	63.3	1.0153	1.7886
			100.200	63.0	64.0	63.0			
3.00	5.15	5.000	119.438		64.0	62.0	63.3	1.0065	1.7679
			124.372	63.0	64.0	63.0			
3.75	4.63	5.000	124.690		64.0	62.0	63.3	1.0135	1.7862
			129.581	63.0	64.0	63.0			
3.75	4.62	5.000	129.581		64.0	62.0	63.0	1.0124	1.7793
			134.475	63.0	63.0	63.0			
3.75	4.62	5.000	134.475		63.0	63.0	63.0	1.0132	1.7793
			139.365	63.0	63.0	63.0			
AVERAGE								1.0108	1.7488

Validity checks:

Meter Factor: 1.0108

\* Y(max - min) ≤ .02 ?

√  
√

ΔH@ : 1.7488

† | ΔH@ - ΔH@ avg. | ≤ .20 in. H2O ?

Calibration by: FT

Reviewed by: KK

**EQUATIONS USED:**

$$Y = (VWG * PBAR * (TDGavg + 460)) / ((VDG * (PBAR + (\Delta H / 13.6)) * (TWGavg + 460)))$$

$$\Delta H@ = ((0.0319 * \Delta H) / (PBAR * (TDGavg + 460))) * (((TWG + 460) * T) / VWG)^2$$







**Attachment to 6.a. 74.15N1-0157 and P00157PC2-Condition 4 (Nebraska Boiler)**

Condition No.	Response												
	Monthly						Rolling 12-Months						Emissions
Month-Year	Natural Gas (scf)	Uptime (hours)	Natural Gas (scf)	Uptime (hours)	Capacity Factor (%)	Nebraska Emissions NOx (tons)	Nebraska Emissions CO (tons)	Cogen Emissions NOx (tons)	Cogen Emissions CO (tons)	Total Emissions NOx (tons)	Total Emissions CO (tons)	Rolling 12 Months NOx (tons)	Rolling 12 Months CO (tons)
74.15 - 1 & 2	Required source test every 24 months will be conducted during next compliance year (last test was on 11/17/2018).												
74.15 - 3	Concentration limits do not apply during cold startup for period of three (3) hours.												
74.15 - 4	Records of biennial source test reports will be maintained and submitted to District upon request.												
PC2 - 4	Operate CEMS for NOx and oxygen including zero and span drift checks daily, reporting of breakdown, recording of operational parameters, reporting of violation, provision of CEMS data in an approved format.												
May-18	2,725,210	37.68	19,323,605	307	2.069%	0.10	0.42	3.83	9.61	3.93	10.03	43.88	66.06
Jun-18	0	0	19,292,222	306	2.066%	0.00	0.00	3.82	9.24	3.82	9.24	43.95	69.33
Jul-18	0	0	19,292,222	306	2.066%	0.00	0.00	3.96	9.07	3.96	9.07	44.15	72.94
Aug-18	0	0	19,292,222	306	2.066%	0.00	0.00	3.75	8.31	3.75	8.31	44.01	75.34
Sep-18	0	0	19,292,222	306	2.066%	0.00	0.00	3.73	8.53	3.73	8.53	44.02	79.23
Oct-18	3,113,410	46.66	22,145,090	346	2.371%	0.12	0.48	3.71	8.48	3.83	8.97	44.15	82.42
Nov-18	585,105	11.92	22,190,762	349	2.376%	0.03	0.09	3.71	7.06	3.74	7.15	44.24	84.28
Dec-18	0	0	21,636,506	333	2.317%	0.00	0.00	3.89	6.90	3.89	6.90	44.35	86.11
Jan-19	11,373	0.45	21,647,879	333	2.318%	0.00	0.00	3.86	7.05	3.86	7.05	44.35	88.35
Feb-19	0	0	21,404,077	329	2.292%	0.00	0.00	3.60	6.34	3.60	6.34	44.50	89.47
Mar-19	946,474	16.01	22,350,550	345	2.393%	0.04	0.15	3.84	7.24	3.89	7.39	44.48	91.10
Apr-19	0	0	7,381,571	113	0.790%	0.00	0.00	2.44	3.66	2.44	3.66	44.42	92.62
May-19	0	0	4,656,361	75	0.499%	0.00	0.00	3.82	4.76	3.82	4.76	44.32	87.36
Jun-19	1,013,281	17.32	5,669,642	92	0.607%	0.02	0.16	3.40	4.16	3.42	4.31	43.92	82.43
Jul-19	12,516,147	198.38	18,185,790	291	1.947%	0.23	1.94	2.79	3.88	3.02	5.83	42.98	79.20
Aug-19	0	0	18,185,790	291	1.947%	0.00	0.00	3.86	5.44	3.86	5.44	43.09	76.33
Sep-19	0	0	18,185,790	291	1.947%	0.00	0.00	3.77	5.14	3.77	5.14	43.13	72.94
Oct-19	12,356,397	184.65	27,428,777	429	2.937%	0.24	1.92	2.82	3.78	3.06	5.70	42.36	69.67
Nov-19	12,236,751	183.26	39,080,424	600	4.185%	0.20	1.90	2.60	3.45	2.80	5.35	41.42	67.88
Dec-19	0	0	39,080,424	600	4.185%	0.00	0.00	3.95	4.95	3.95	4.95	41.48	65.92
Jan-20	0	0	39,069,051	600	4.183%	0.00	0.00	3.98	5.69	3.98	5.69	41.60	64.56
Feb-20	1,104,655	15.17	40,173,705	615	4.302%	0.02	0.17	3.71	5.15	3.73	5.32	41.73	63.54
Mar-20	0	0	39,227,231	599	4.200%	0.00	0.00	4.18	5.66	4.18	5.66	42.03	61.81
<b>Max. Rolling 12 Months</b>			<b>40,173,705</b>	<b>615</b>	<b>4.302%</b>	<b>0.240</b>	<b>1.94</b>	<b>4.18</b>	<b>5.69</b>	<b>4.18</b>	<b>5.83</b>	<b>44.42</b>	<b>92.64</b>
Permit Limit												<b>50.00</b>	<b>97.44</b>
Exceeds Permit Limit?												NO	NO
Excess Emissions (Max. Rolling 12												<b>-5.58</b>	<b>-4.82</b>
Excess Emissions (Compliance Year)												<b>-7.97</b>	<b>-35.63</b>

Sample Calculation:  
 Capacity Factor = Annual Fuel Usage \* HHV natural gas / (Equipment rating \* Hours/year)  
 Capacity Factor = (10 MMcf/yr) \* (1.030 BTU/cf) / ((108 MMBtu/hr) \* (8,760 hr/yr))  
 Capacity Factor = 1.09%

Tune-up performed on 4/13/2018.  
 Nebraska NOx from CEMS. CO calculated based on 310.64 lb/MMcf as stated in



Attachment to 7.c. PO00157PC2

DATE	GAS TURBINE			COEN DUCT BURNER			MAXON BURNER			CEMS						
	Monthly (therms)	HHV	Monthly (scf)	Rolling 12-month (MMcf)	Monthly (therms)	Monthly (scf)	Rolling 12-month (MMcf)	Monthly (therms)	Monthly (scf)	Rolling 12-month (MMcf)	NOx (tons)	Rolling 12-month NOx (tons)	Monthly CO (tons)	Monthly NOx (tons)	Rolling 12-month CO (tons)	Rolling 12-month NOx (tons)
May-18	1,867,462	1,017	183,714,904	2,056	78,390	7,711,752	64	14,015	1,378,784	14.7	0.06	0.67	9.61	3.83	65.5	42.5
Jun-18	1,869,554	1,022	182,877,238	2,054	69,004	6,749,877	66	13,196	1,290,786	14.7	0.06	0.67	9.24	3.82	68.7	42.6
Jul-18	1,969,477	1,021	192,953,561	2,062	36,815	3,606,820	66	13,845	1,356,379	15.4	0.06	0.70	9.07	3.96	72.4	42.8
Aug-18	1,859,823	988	188,336,506	2,060	39,249	3,974,560	66	12,494	1,265,170	15.9	0.06	0.72	8.31	3.75	74.8	42.6
Sep-18	1,872,085	1,014	184,623,767	2,063	36,997	3,648,606	66	10,956	1,080,497	15.0	0.05	0.68	8.53	3.73	78.6	42.6
Oct-18	1,788,319	1,018	175,652,588	2,065	42,979	4,221,454	65	11,099	1,090,174	14.9	0.05	0.68	8.48	3.71	81.4	42.7
Nov-18	1,874,137	1,015	184,607,664	2,073	39,178	3,859,176	63	16,750	1,649,918	15.2	0.08	0.70	7.06	3.71	83.1	42.8
Dec-18	1,987,099	1,029	193,184,814	2,094	44,728	4,348,480	61	16,152	1,570,326	15.3	0.07	0.70	6.90	3.89	85.0	43.0
Jan-19	1,935,135	1,029	187,986,691	2,095	36,190	3,515,639	59	13,834	1,343,843	15.6	0.06	0.71	7.05	3.86	87.2	43.0
Feb-19	1,798,800	1,034	174,015,672	2,106	37,947	3,670,997	55	12,961	1,253,855	15.5	0.06	0.71	6.34	3.60	88.3	43.1
Mar-19	1,898,159	1,033	183,841,065	2,102	49,527	4,796,778	52	12,514	1,212,030	15.1	0.06	0.69	7.24	3.84	89.8	43.1
Apr-19	1,222,171	1,029	118,818,880	2,151	40,205	3,908,717	54	8,765	852,099	15.3	0.04	0.70	3.66	2.44	91.5	44.1
May-19	1,935,669	975	198,489,438	2,165	57,802	5,927,210	52	7,935	813,659	14.8	0.04	0.68	4.76	3.82	86.6	44.1
Jun-19	1,797,484	1,013	177,424,144	2,160	27,644	2,728,678	48	495	48,905	13.5	0.00	0.62	4.16	3.40	81.6	43.7
Jul-19	1,325,946	1,013	130,841,326	2,098	38,623	3,811,232	48	12,363	1,219,992	13.4	0.06	0.61	3.88	2.79	76.4	42.5
Aug-19	1,949,294	1,007	193,497,518	2,103	47,391	4,704,268	49	6,858	680,746	12.8	0.03	0.59	5.44	3.86	73.5	42.6
Sep-19	1,908,537	1,014	188,274,342	2,107	45,795	4,517,567	50	14,078	1,388,801	13.1	0.06	0.60	5.14	3.77	70.1	42.7
Oct-19	1,424,219	909	156,645,293	2,088	39,177	4,308,959	50	9,199	1,011,733	13.0	0.04	0.59	3.78	2.82	65.4	41.8
Nov-19	1,384,892	1,039	133,355,031	2,036	35,424	3,411,103	50	19,536	1,881,159	13.3	0.09	0.61	3.45	2.60	61.8	40.7
Dec-19	1,937,372	1,032	187,711,656	2,031	67,226	6,513,481	52	16,936	1,640,879	13.3	0.08	0.61	4.95	3.95	59.9	40.7
Jan-20	1,915,866	1,041	184,040,922	2,027	107,986	10,373,295	59	15,202	1,460,327	13.5	0.07	0.62	5.69	3.98	58.5	40.9
Feb-20	1,771,859	1,041	170,207,397	2,023	120,858	11,609,798	67	17,356	1,667,243	13.9	0.08	0.64	5.15	3.71	57.3	41.0
Mar-20	1,975,349	1,043	189,391,083	2,029	106,790	10,238,734	72	14,012	1,343,432	14.0	0.06	0.64	5.66	4.18	55.7	41.3
Max. Rolling 12 Months			2,165.4		-	-	72.1	-	-	15.3	-	0.7	-	-	91.5	44.1
Permit Limit			2,847		-	-	854	-	-	36.5	-	1.90	-	-	97.66	50.0
Exceeds Permit Limit?			NO		-	-	NO	-	-	NO	-	NO	-	-	NO	NO
Excess Emissions (Max. Rolling 12 Months)			-682		-	-	-782	-	-	-21.2	-	-1.20	-	-	-6.18	-5.9
Excess Emissions (Compliance Year)			-745		-	-	-802	-	-	-21.4	-	-1.21	-	-	-7.85	-6.9

\*CEMS data columns calculate monthly emissions by summing the pounds per hour emissions for every hour during the month that the turbine was operating, including start-ups, shut-downs, and upsets.

The CEMS uses the following methodology to estimate emissions as presented in this condition of the permit.

lb/hr = X \* (hourly ppmv@15% O2) \* (hourly fuel throughput)

ton/yr = Sum of hourly emissions for each month and evaluate annual limits based on rolling 12-month average. 2000 lb/ton.

where X = (8,740 dscf/MMBtu) \* ((NOx or CO) lb/lb-mole) \* (20.9/(20.9-15)) \* ((lb-mole/387 scf) \* 1E-6 \* HHV

(average HHV of fuel analyses over compliance year)

HHV = 1,013 btu/cf

NOx = 46 lb/lb-mole

CO = 28 lb/lb-mole



**Work Order Details**

195669: MH-PM, 1Y, INSPECT ADMIN OFFICE COMPUTER ROOM GENERATOR

This is an official APCD requirement effective 2014. Maintenance delays shall be reported to APCD Compliance Division.

Required annual maintenance includes:

- Change Oil
- Change Oil Filter
- Change Spark Plugs
- Hose & Belt inspection/replacement as needed

**PARTS**

OIL MOTOR, CASTROL HYSTER P/N - 995 C5W30 – VENDER #28333296 - Johnson Lift Hyster

OIL FILTER, HYSTER P/N - HYS BWB243 – VENDER #28333296 - Johnson Lift Hyster

SPARK PLUG WIRES HYSTER P/N - 995 35-4134 - VENDER #28333296 - Johnson Lift Hyster

SPARK PLUG, HYSTER P/N - 995 764 - VENDER #28333296 - Johnson Lift Hyster

VALVE, PCV HYSTER P/N - HYS 3133057 - VENDER #28333296 - Johnson Lift Hyster

DC24MF GP24 Maeine Battery 750

Asset: 6810 Generator, Main Office Computer Room  
 Location: 3146 Generator, Main Office Computer Room

Equipment #: 111-9013  
 Functional Location: 8149-09-01-030-140-080  
 MCC Location:

Sched Start:	6/4/19
Sched Finish:	
Target Start:	6/4/19
Target Finish:	6/4/19
Actual Start:	2/20/20
Actual Finish:	2/20/20
Report Date:	6/4/19
Reported By:	MAXADMIN
On Behalf Of:	

Site:	OXNARD
Priority:	3
Work Type:	PM
Status:	COMP
Parent:	
Failure Class:	
Problem Code:	
GL Account:	393900.453120

Job Plan:	JP2036
Supervisor:	
Lead:	JWEST
Vendor:	
Person Group:	252
Service:	
Service Group:	
Classification:	

Work Order Tracking

Find Work Order



- List View
- Work Order
- Plans
- Assignments
- Actuals
- Related Records
- Safety Plan
- Log
- Failure Reporting
- Specifications
- Service Address
- Map

<b>Work Order:</b> 195869 <b>Location:</b> 3148 >> Generator, Main Office Computer Room <b>Asset:</b> 6810 >> Generator, Main Office Computer Room <b>Equipment Number:</b> 111-9013 <b>Functional Location:</b> 8149-09-01-030-140-080 <b>MCC Location:</b>  <b>Failure Class:</b> <input type="text"/> >> <b>Problem Code:</b> <input type="text"/> >> <b>Parent WO:</b> <input type="text"/> >> <b>Shutdown Code:</b> <input type="text"/> >> <b>WO Action Code:</b> <input type="text"/> >>	<b>Site:</b> OXNARD <b>Class:</b> WORKORDEF <b>Asset Criticality:</b> 5 <b>WO Priority:</b> <input type="text"/> Medium- 15-30 d <b>Work Type:</b> PM <b>Planner Group:</b> 252 >> <b>Project ID:</b> <input type="text"/> >> <b>Project Task:</b> <input type="text"/> >> <b>GL Account:</b> 393800 453120 <b>Scheduled:</b> <input type="text"/> >>	<b>Attachments:</b>  <b>Status:</b> COMP <b>Status Date:</b> 2/20/20 10:43 AM <b>Inherit Status Changes?</b> <input checked="" type="checkbox"/> <b>Accepts Charges?</b> <input checked="" type="checkbox"/> <b>Is Task?</b> <input type="checkbox"/> <b>Storeroom Material Status:</b> <input type="text"/> >> <b>Direct Issue Material Status:</b> <input type="text"/> >> <b>Work Package Material Status:</b> <input type="text"/> >> <b>Material Status Last Updated:</b> 
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Scheduling Information

<b>Target Start:</b> <input type="text" value="5/4/19 12:00 AM"/> >>	<b>Actual Start:</b> <input type="text" value="2/20/20 10:43 AM"/> >>
<b>Target Finish:</b> <input type="text" value="5/4/19 12:00 AM"/> >>	<b>Actual Finish:</b> <input type="text" value="2/20/20 10:43 AM"/> >>
<b>Scheduled Start:</b> <input type="text" value="5/4/19 12:00 AM"/> >>	<b>Duration:</b> <input type="text" value="0.00"/>
<b>Scheduled Finish:</b> <input type="text"/> >>	<b>Time Remaining:</b> <input type="text"/>
<b>Start No Earlier Than:</b> <input type="text"/> >>	<b>Predecessors:</b> <input type="text"/> >>
<b>Finish No Later Than:</b> <input type="text"/> >>	<b>Include Tasks in Schedule?</b> <input type="checkbox"/>
<b>PM Due Date:</b> 5/4/19	

Follow-up Work

<b>Originating Record:</b> <input type="text"/> >>
<b>Originating Record Class:</b> <input type="text"/> >>
<b>Has Follow-up Work?</b> <input type="checkbox"/>
<b>Most Recent Follow Up WO:</b> <input type="text"/> >>
<b>Rebuild Item Number:</b> <input type="text"/> >>
<b>Rebuild Item Quantity:</b> <input type="text"/>
<b>Rebuild PO:</b> <input type="text"/>
<b>Interruptible?</b> <input type="checkbox"/>
<b>Interruptible shift:</b> <input type="text"/> >>

Responsibility

<b>Reported By:</b> <input type="text" value="MAXADMIN"/> >>	<b>Supervisor:</b> <input type="text"/> >>	<b>Service:</b> <input type="text"/> >>
<b>Reported Date:</b> <input type="text" value="5/4/19 2:01 AM"/> >>	<b>Lead:</b> <input type="text" value="AMEST"/> >>	<b>Service Group:</b> <input type="text"/> >>
<b>On Behalf Of:</b> <input type="text"/> >>	<b>Vendor:</b> <input type="text"/> >>	<b>Crew:</b> <input type="text"/> >>
<b>Phone:</b> <input type="text"/>	<b>Owner:</b> <input type="text"/>	<b>Crew Work Group:</b> <input type="text"/> >>

- Job Details
- Asset Details
- Priority Analysis

Address Information

<b>Service Address:</b> <input type="text"/> >>	<b>City:</b> <input type="text"/>
<b>Formatted Address:</b> <input type="text"/>	<b>State/Province:</b> <input type="text"/>
<b>Street Address:</b> <input type="text"/> >>	

Multiple Assets, Locations and CIs 0 - 0 of 0

# NEW INDY

**CONTAINERBOARD**

January 3, 2020

County of Ventura  
Air Pollution Control District  
669 County Square Drive, 2<sup>nd</sup> Floor  
Ventura, CA 93003

Attention: Mr. Ed Swede

Subject: 2019 Annual Report for Emergency Generator

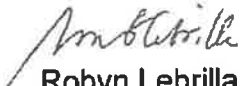
Dear Mr. Swede:

In compliance with Rule 74.9(F)(2) reporting requirement, New-Indy Oxnard mill is submitting the following information for the stationary internal combustion engine(s) rated at >50 HP maintained at the facility:

Unit	2019 Hours of Operation	2019 Maintenance Hours
Admin Emergency Generator WINCO PSS35000 88 HP	15	28

If you have any questions, please do not hesitate to contact me at (805) 271-7284.

Sincerely,



Robyn Lebrilla  
Environmental Engineer

---

**NEW INDY OXNARD, LLC**

5936 PERKINS ROAD • OXNARD, CALIFORNIA 93033 • WWW.NEWINDYCONTAINERBOARD.COM  
PHONE (805) 986-3881 • FAX (805) 488-5186



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:

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


### Certification by Responsible Official

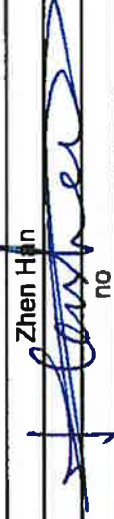
I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this document is true, accurate, and complete.


<p>Signature and Title of Responsible Official:</p> <p>Signature: <u></u></p> <p>Title: <u>Mill Manager</u></p>	<p>Date:</p> <p><u>01/4/2020</u></p>
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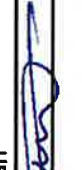
## Stack Opacity Observation Protocol


<b>Object:</b>	Cogen Stack
<b>Date of Observation:</b>	06/18/19
<b>Time of Observation:</b>	2:03 PM
<b>Fuel burned:</b>	Natural Gas
<b>Name of the observing person:</b>	Zhen Han
<b>Signature</b>	
<b>Was Visible Emission Other Than Steam Present ?</b>	no
<b>Object:</b>	Nebraska Boiler
<b>Date of Observation:</b>	n/a
<b>Time of Observation:</b>	n/a
<b>Fuel burned:</b>	n/a
<b>Name of the observing person:</b>	n/a
<b>Signature</b>	n/a
<b>Was Visible Emission Other Than Steam Present ?</b>	n/a

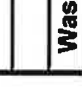
<b>Object:</b>	Paper Forming/Paper Drying
<b>Date of Observation:</b>	06/18/19
<b>Time of Observation:</b>	2:03 PM
<b>Fuel burned:</b>	N/A
<b>Name of the observing person:</b>	Zhen Han
<b>Signature</b>	
<b>Was Visible Emission Other Than Steam Present ?</b>	no

<b>Object:</b>	Maxon Burner
<b>Date of Observation:</b>	06/18/19
<b>Time of Observation:</b>	2:03 PM
<b>Fuel burned:</b>	Natural Gas
<b>Name of the observing person:</b>	Zhen Han
<b>Signature</b>	
<b>Was Visible Emission Other Than Steam Present ?</b>	no


## Stack Opacity Observation Protocol

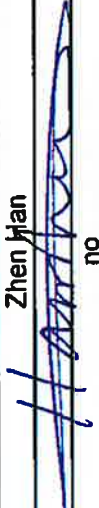
<b>Object:</b>	Cogen Stack
<b>Date of Observation:</b>	09/06/19
<b>Time of Observation:</b>	9:45 AM
<b>Fuel burned:</b>	Natural Gas
<b>Name of the observing person:</b>	Zhen Han
<b>Signature</b>	
<b>Was Visible Emission Other Than Steam Present ?</b>	no
<hr/>	
<b>Object:</b>	Nebraska Boiler
<b>Date of Observation:</b>	n/a
<b>Time of Observation:</b>	n/a
<b>Fuel burned:</b>	n/a
<b>Name of the observing person:</b>	n/a
<b>Signature</b>	n/a
<b>Was Visible Emission Other Than Steam Present ?</b>	n/a


<b>Object:</b>	Paper Forming/Paper Drying
<b>Date of Observation:</b>	09/06/19
<b>Time of Observation:</b>	9:45 AM
<b>Fuel burned:</b>	N/A
<b>Name of the observing person:</b>	Zhen Han
<b>Signature</b>	
<b>Was Visible Emission Other Than Steam Present ?</b>	no

<b>Object:</b>	Maxon Burner
<b>Date of Observation:</b>	09/06/19
<b>Time of Observation:</b>	9:45 AM
<b>Fuel burned:</b>	Natural Gas
<b>Name of the observing person:</b>	Zhen Han
<b>Signature</b>	
<b>Was Visible Emission Other Than Steam Present ?</b>	no


## Stack Opacity Observation Protocol

<b>Object:</b>	Cogen Stack
<b>Date of Observation:</b>	12/19/19
<b>Time of Observation:</b>	2:35 PM
<b>Fuel burned:</b>	Natural Gas
<b>Name of the observing person:</b>	Zhen Han
<b>Signature</b>	
<b>Was Visible Emission Other Than Steam Present ?</b>	no
<b>Object:</b>	Nebraska Boiler
<b>Date of Observation:</b>	n/a
<b>Time of Observation:</b>	n/a
<b>Fuel burned:</b>	n/a
<b>Name of the observing person:</b>	n/a
<b>Signature</b>	n/a
<b>Was Visible Emission Other Than Steam Present ?</b>	n/a

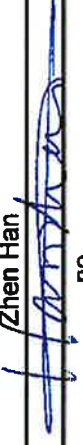
<b>Object:</b>	Paper Forming/Paper Drying
<b>Date of Observation:</b>	12/19/19
<b>Time of Observation:</b>	2:35 PM
<b>Fuel burned:</b>	N/A
<b>Name of the observing person:</b>	Zhen Han
<b>Signature</b>	
<b>Was Visible Emission Other Than Steam Present ?</b>	no


<b>Object:</b>	Maxon Burner
<b>Date of Observation:</b>	12/19/19
<b>Time of Observation:</b>	2:35 PM
<b>Fuel burned:</b>	Natural Gas
<b>Name of the observing person:</b>	Zhen Han
<b>Signature</b>	
<b>Was Visible Emission Other Than Steam Present ?</b>	no

## Stack Opacity Observation Protocol

<b>Object:</b>	Cogen Stack
<b>Date of Observation:</b>	02/26/20
<b>Time of Observation:</b>	8:30 AM
<b>Fuel burned:</b>	Natural Gas
<b>Name of the observing person:</b>	Zhen Han
<b>Signature</b>	
<b>Was Visible Emission Other Than Steam Present ?</b>	no

<b>Object:</b>	Nebraska Boiler
<b>Date of Observation:</b>	n/a
<b>Time of Observation:</b>	n/a
<b>Fuel burned:</b>	n/a
<b>Name of the observing person:</b>	n/a
<b>Signature</b>	n/a
<b>Was Visible Emission Other Than Steam Present ?</b>	n/a

<b>Object:</b>	Paper Forming/Paper Drying
<b>Date of Observation:</b>	02/26/20
<b>Time of Observation:</b>	8:30 AM
<b>Fuel burned:</b>	N/A
<b>Name of the observing person:</b>	Zhen Han
<b>Signature</b>	
<b>Was Visible Emission Other Than Steam Present ?</b>	no

<b>Object:</b>	Maxon Burner
<b>Date of Observation:</b>	02/26/20
<b>Time of Observation:</b>	8:30 AM
<b>Fuel burned:</b>	Natural Gas
<b>Name of the observing person:</b>	Zhen Han
<b>Signature</b>	
<b>Was Visible Emission Other Than Steam Present ?</b>	no

**VENTURA COUNTY  
AIR POLLUTION CONTROL DISTRICT**  
Memorandum

TO: Karl Krause

DATE: May 23, 1996

FROM: Terri Thomas

SUBJECT: Rule 54.B.2 Compliance

Per your request, I ran some screening level dispersion modeling tests to determine equipment parameters that would comply with Rule 54.B.2. Rule 54.B.2 limits ground level property line SO<sub>2</sub> concentrations to 0.25 ppm<sub>v</sub> for 1 hour and 0.04 ppm<sub>v</sub> for 24 hours.

I assume that the most common SO<sub>2</sub> emission source is diesel combustion in IC engines. Therefore, that was the focus of my analysis.

To determine appropriate stack parameters, I reviewed 4 source test reports for diesel ICEs prepared for AB 2588. For screening purposes, the most conservative value was chosen from the test data for each stack parameter. The following summarizes stack data from these reports:

Parameter	# tests reporting parameter value	range of values	screening value
Stack velocity	3	1,812-11,343 ft/min	1,812 ft/min 9.2 m/s
Stack diameter	3	2-6 inches	2 inches 0.05 meters
Stack temperature	4	192-785°F	192°F 362 K
Stack height	0	NA	2 meters

SO<sub>2</sub> emissions were based on 300 ppm<sub>v</sub> in the stack, which is the limit in Rule 54.B.1.a. This limit cannot be exceeded if the diesel fuel meets the 0.5% sulfur limit in Rule 64.B.2.

Other assumptions used in modeling were that the stack was vertical and has no raincap, and the property line was at least 100 meters from the stack.

Using the parameters and assumptions listed above, screening modeling showed that the limits in Rule 54.B.2 would not be exceeded.

Use of the minimum stack diameter, and thus, the minimum flow rate and emission rate is not the most conservative case. In order to determine the maximum emission rate that could be shown to meet the Rule under the conditions described above, modeling was performed by increasing the emissions and flow rate (to maintain the 300 ppm<sub>v</sub> SO<sub>2</sub> stack concentration), but increasing the stack diameter to maintain the minimum velocity. Modeling results are summarized below.

Emission rate (g/s)	Emission rate (lb/hr) and (lb/day)	1 hour max concentration (ppm <sub>v</sub> ) (limit=0.25)	24 hour max concentration (ppm <sub>v</sub> ) (limit=0.04)
0.0145	0.12 2.76	0.04	0.01
0.029	0.23 5.52	0.06	0.03
0.058	0.46 11.04	0.11	0.04
0.116	0.92 22.08	0.17	0.07
0.232	1.84 44.15	0.23	0.05

From the above, if SO<sub>2</sub> emissions do not exceed 1.84 lb/hr, the 1-hour limit of Rule 54.B.2 will be met. This is equivalent to burning 26 gallons of diesel at 0.5% sulfur per hour.

If SO<sub>2</sub> emissions do not exceed 11.04 lb/day, the 24-hour limit of Rule 54.B.2 will be met. This is equivalent to burning 155 gallons of diesel at 0.5% sulfur per day.

If the sulfur content of the fuel is lower than 0.5%, the allowable amount of fuel would, of course, be greater.

Let me know if the above information meets your needs. If so, another scenario that is probably common is a nonvertical stack (or stack with raincap). I can develop similar information for this case if you want.



Ventura County  
Air Pollution  
Control District

669 County Square Drive  
Ventura, California 93003

tel 805/645-1400  
fax 805/645-1444  
www.vcapcd.org

Michael Villegas  
Air Pollution Control Officer

**PERMIT TO OPERATE**  
Number 08244

Valid July 1, 2019 to June 30, 2020

**This Permit Has Been Issued To The Following:**

Company Name / Address:

Vital Coatings Inc.  
2131 Anthony Drive  
Ventura, CA 93003

Facility Name / Address:

Vital Coatings Inc.  
Portable Architectural Coating Ops.  
Ventura County, CA 00000

**Permission Is Hereby Granted To Operate The Following:**

Portable Architectural Surface Coating Operation, for the coating of process and industrial equipment subject to Rule 74.2, "Architectural Coatings". The surface coating of houses, office buildings, etc. is exempt from permit pursuant to Rule 23.F.7.

Permittee may use portable air compressor engines, provided that they are rated at less than 50 BHP (exempt Rule 23.D.6) or registered and complying with the California ARB Portable Equipment Registration Program (exempt Rule 23.D.9)

**This Permit Has Been Issued Subject To The Following Conditions:**

- | 1. Permitted Emissions | Tons/Year | Pounds/Hour |
|------------------------|-----------|-------------|
| Reactive Organics      | 1.04      | 1.00        |
2. Annual usage shall not exceed 1,000 gallons per year of coatings with maximum ROC (VOC) content of 250 grams per liter of material (2.09 pounds per gallon) as applied, while operating in Ventura County.

In order to comply with this condition, permittee shall maintain daily records and monthly reports of coatings, surface preparation materials, and coatings application equipment cleanup materials. Monthly usage shall be totaled and the monthly totals summed for the previous twelve months. Material usage totals for any of these twelve (12) month periods in excess of the above limit shall be considered a violation of this condition. Prior to exceeding the above limit, permittee shall submit an application to modify this condition.

3. This permit authorizes painting of stationary structures and their appurtenances (as defined in APCD Rule 74.2) at their permanent sites only.
4. All coating operations shall comply with APCD Rule 74.2,

VCAPCD Permit To Operate Number 08244  
Issued To Vital Coatings Inc.  
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"Architectural Coatings". The reactive organic compound content of flat coatings shall not exceed 50 grams per liter, computed on a minus water, minus exempt solvent basis as applied. The reactive organic compound content of nonflat coatings used shall not exceed 100 grams per liter, computed on a minus water, minus exempt solvent basis as applied. The reactive organic compound content of the industrial maintenance coatings used shall not exceed 250 grams per liter, computed on a minus water, minus exempt solvent basis as applied. Other coatings used shall meet their specific limit in the Rule 74.2 Table of Standards. Thinning of the coatings shall not cause the coatings to exceed their applicable standard.

5. The permittee shall employ reasonable methods to insure that discharge from the surface coating work area does not cause a nuisance, pursuant to California Health & Safety Code Section 41700 and APCD Rule 51 (Nuisance). Such methods may include, but are not limited to, use of shrouding and covering of objects adjacent to the surface coating activity.
6. The permittee shall not use solvent containing materials for surface preparation. This condition is applied pursuant to Rule 26 and Rule 74.6. Acetone or solvents with an ROC content of less than 25 grams per liter may be used in any amount.
7. All ROC containing materials, used or unused, including but not limited to surface coatings, surface preparation materials and cleanup materials shall be stored in closed containers. This condition is applied as Best Available Control Technology (BACT).
8. Portable surface coating equipment may be used anywhere in Ventura County.
9. The District shall be notified at least 48 hours prior to conducting painting operations by leaving a message on the District 24-hour message recorder at (805)654-2797 or by faxing a notification to (805)645-1444.

The notification shall include the following information:

- a) Identification of operator and the Permit to Operate number (No. 08244).
  - b) The location (street address and city) and a description of the painting activity.
  - c) The expected starting date and duration of the painting activity.
10. The permittee shall record and maintain the following information on each surface coating operation performed in Ventura County. The records shall be compiled into a monthly report. These records shall be maintained for the previous two years and shall be made available to APCD personnel upon request:



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Issued To Vital Coatings Inc.  
Valid July 1, 2019 to June 30, 2020


- a) The location and a description of the surface coating activities.
- b) The starting and ending dates.
- c) On a daily or per site basis, record usage as follows: the brand name and product or number for each coating, solvent and thinner used; the mix ratio of the components used; the quantity of each material used; the ROC content of the coatings, as applied, computed on a minus water, minus exempt solvent basis; the coating category (e.g., coating, solvent, thinner, etc.); and the method of application.
- d) On a daily or per site basis, record usage of spray equipment cleanup solvent used, which includes the following: brand and product name or number of each solvent; the quantity of each solvent used; the ROC content; and the method of application.

If purchase records are used to determine the amount of solvents used, then records and manifest of the amounts of solvents disposed of or sent to a recycler must also be maintained.

Within 30 days after receipt of this permit, the permittee may petition the Hearing Board to review any new or modified condition (Rule 22).

This permit, or a copy, shall be posted reasonably close to the subject equipment and shall be accessible to inspection personnel (Rule 19). This permit is not transferable from one location to another unless the equipment is specifically listed as being portable (Rule 20).

This Permit to Operate shall not be construed to allow any emission unit to operate in violation of any state or federal emission standard or any rule of the District.

  
Kerby E. Zozula, Manager  
Engineering Division

For:

Michael Villegas  
Air Pollution Control Officer



operate below this emission factor or emission limit. The particulate matter emission factors for these units are:

Natural Gas Fired Units		Rule 57.B Factor = 0.12 lb PM / MMBTU
Boiler > 100 MMBTU/Hr	3 lb/mmcf	0.00286 lb / MMBTU
Boiler 10 - 100 MMBTU/Hr	13.7 lb/mmcf	0.0131 lb / MMBTU
Boiler < 10 MMBTU/Hr	12 lb/mmcf	0.0114 lb / MMBTU
Turbine		0.0419 lb / MMBTU
Lean Burn Engine		0.046 lb / MMBTU
Rich Burn Engine		0.0007 lb / MMBTU

Fuel Oil or Diesel Fired Units		Rule 57.B Factor = 0.17 lb PM / MMBTU
Fuel Oil Fired Boiler	2 lb / Mgal	0.014 lb / MMBTU
Fuel Oil Fired Turbine		0.061 lb / MMBTU
Diesel Engine > 600 HP		0.062 lb / MMBTU

Compliance with the emission limit for diesel engines < 600 HP has been shown through the conducting of a source test on an engine within Ventura County. This source test was conducted for the purpose of generating an emission factor to be used for Air Toxic "Hot Spots" emission estimations. The measured particulate concentration for this engine was 0.1 gr/dscf at 12 percent CO<sub>2</sub>. The engine source test was a Cummins NTA engine rated at 335 horsepower at 2100 rpm. The source test was conducted July 29, 1992.

m:\title\rule57.Bcomp

**New-Indy Oxnard, LLC**

**Attachment to 8.i.Rule 74.11.1 - Title V Annual Certification**

**Date: 2/6/20**

**Conducted by: Zhen Han**

Formal survey identifying each natural gas-fired water heater, boiler, steam generator and process heater with heat input capacity between 75,000 and 1,000,000 btu/hr.

	North Property Space Heaters	North Property Water Heater	Admin Water Heater	Maintenance Lunch Room Water Heater
Manufacturer	Modine Manufacturing Company	Bradford White Corporation	Rinnai Corporation	Bradford White Corporation
Brand name	Modine	Eco-Defender	Rinnai	Eco-Defender
Model number	PD 300AE0130	URG250T6N	RL94e (REU-VC2837WD-US)	U440T6FRN
Heat input rating	300,000 BTU/hr	40,000 BTU/hr	199,000 BTU/hr	40,000 BTU/hr
Installation date		Nov-15	Jun-17	May-11
Certification status under VCAPCD Rule 74.11.1C or SCAQMD Rule 1146.2	None	Complies with jurisdictions having 10ng/J NOx Regs	Complies with SCAQMD Rule 1146.2 (<14 ng NOx/J)	Complies with SCAQMD Rule 1121
Number of units	4	1	1	1
Comment	Rule 74.11.1C covers NG-fired water heaters, small boilers, steam generator or process heaters - NOT space heaters	Exempt - less than 75000 BTU/hr		Exempt - less than 75000 BTU/hr

**NOTES:**

- \* 2 steam cleaners - propane fired
- \* Sump pumps & welders - portable, not natural gas-fired