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**Trustees of CSU and
CSUCI Site Authority**

Camarillo, CA

**Title V part 70
Annual Compliance Certification**

VCAPCD Permit to Operate #1267

Period covered April 1, 2019 to March 31, 2020

April 2020

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Ventura County
Air Pollution
Control District

**ANNUAL COMPLIANCE CERTIFICATION
SIGNATURE COVER FORM**

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

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

Confidentiality

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

Certification by Responsible Official

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

<p>Signature and Title of Responsible Official:</p> <p>Ysabel Trinidad <i>Ysabel Trinidad</i></p> <p>Title:</p> <p>Vice President</p>	<p>Date:</p> <p>04/17/2020</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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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 #: 74.9N7</p> <p>B. Description: Rule 74.9.D.3 Applicable Requirements Emergency Standby Stationary Internal Combustion Engines Operated During Either an Emergency or Maintenance Operation.</p> <p>C. Method of monitoring: Maintain records of: 1) Annual hours used during maintenance operations 2) Date, time, duration, and reason for emergency operation 3) Engine Manufacturer, model number, operator id, and location.</p>	<p>D. Frequency of monitoring: Submit report of annual engine hours of maintenance to District every Calendar Year by February 15.</p> <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</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 #: ATCM</p> <p>B. Description: ATCM for Stationary Compression Ignition Engines.</p> <p>C. Method of monitoring: Record hours operated for maintenance and testing. Records of fuel type purchased for use.</p>	<p>D. Frequency of monitoring: Each Use Each Delivery</p> <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</p> <p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>
<p>A. Attachment # or Permit Condition #: 40 CFR Part 63, Subpart ZZZZ</p> <p>B. Description: NESHAP for Reciprocating Internal Combustion Engines.</p> <p>C. Method of monitoring: 1) Change Oil Filter annually or every 500 hours or approved oil testing program. 2) Inspect Air Filter annually or every 1000 hours. 3) Inspect Belts/Hoses annually or every 500 hours. 4) Limit Non-Emergency use to less than 50 hours/year.</p>	<p>D. Frequency of monitoring: Each Use Each Maintenance Cycle</p> <p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</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>74.15N1</u></p>	<p>D. Frequency of monitoring: Annual Source Test Biennial Source Testing</p>
<p>B. Description: Rule 74.15.B.1 Applicable Requirements Boilers, Heater Treaters, Steam Generators, and Process Heaters: NOx and CO Emission Limits Annual Heat Input > 9,000 MMBTU.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable NOx - ARB Method 100 CO - ARB Method 100</p>
<p>C. Method of monitoring: Maintain Records of: 1) Source test report; and 2) Daily records of alternate fuel consumption.</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>STRMLN1267-LM-2500-NOx, NH3</u></p>	<p>D. Frequency of monitoring: Continuous emission monitoring system for fuel consumption, NOx, O2, and control system parameters.</p>
<p>B. Description: GE LM 2500-33 Gas Turbine Based Cogeneration Unit NOx and NH3 Applicable Requirements Including Streamlined NOx Requirements</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Note 1.</p>
<p>C. Method of monitoring: Annual Source Test for NOx, O2, NH3, and gaseous fuel HHV, CEMS data. Maintain Records for: 1) Source test Report 2) Maintenance operations periodic inspections, and repairs performed on the gas turbine, air pollution control system, and continuous emission monitors; and 3) Violations on exceedances of limits.</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>STRMLN1267-LM-2500-SOx</u></p>	<p>D. Frequency of monitoring: None</p>
<p>B. Description: GE LM 2500-33 Gas Turbine Based Cogeneration Unit SOx Applicable Requirements - Streamlined Natural Gas and Distillate Fuel Oil Limits</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Note 2.</p>
<p>C. Method of monitoring: Only used PUC quality gas. Did not have any Distillate Fuel Oil deliveries.</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 #: PO1267PC1 Condition No. 1</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Additional Permit Requirements Condition No. 1 - Throughput and Consumption Limits</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</p>
<p>C. Method of monitoring: Maintain 12-month rolling average records of throughput and consumption.</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 #: PO1267PC1 Condition No. 2</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Additional Permit Requirements Condition No. 2 - Solvent Usage</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</p>
<p>C. Method of monitoring: Maintain monthly records of solvent purchase and usage, as well as records of solvent that is recycled or disposed of properly.</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 #: PO1267PC2 Condition No. 1 & 8</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Additional Permit Requirements Condition No. 1 - Annual Emission and Throughput Limits Condition No. 8 - Records</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</p>
<p>C. Method of monitoring: Maintain rolling 12 month average records of natural gas, fuel oil, and ammonia consumption, as well as emissions of ROC, NOx, PM, SOx, and CO for the gas turbine and for the B&W boilers.</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 #: PO1267PC2 Condition No. 2 & 8</p> <p>B. Description: Additional Permit Requirements Condition No. 2 - Steam Boilers - Natural Gas Condition No. 8 - Records</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>C. Method of monitoring: Maintain rolling 12-month average records of fuel consumption and emissions of ROC, NOx, PM, SOx, and CO for the B&W boilers.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</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 #: PO1267PC2 Condition No. 3 & 8</p> <p>B. Description: Additional Permit Requirements Condition No. 3 - Steam Boilers - Fuel Oil Condition No. 8 - Records</p>	<p>D. Frequency of monitoring: Upon use</p>
<p>C. Method of monitoring: Maintain Records of fuel oil used. No fuel oil used this period.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</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 #: PO1267PC2 Condition No. 4</p> <p>B. Description: Additional Permit Requirements Condition No. 4 - Steam Boilers - Monitor and Record Fuel Consumption</p>	<p>D. Frequency of monitoring: Continuous</p>
<p>C. Method of monitoring: Continuous monitoring and recording of fuel consumption B&W boilers.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</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 #: PO1267PC2 Condition No. 5</p>	<p>D. Frequency of monitoring: Continuous</p>
<p>B. Description: Additional Permit Requirements Condition No. 5 - Steam Boilers - CEM for excess Oxygen in Exhaust Stacks</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</p>
<p>C. Method of monitoring: Continuous in-stack emissions monitoring and recording of excess oxygen in exhaust stacks of B&W boilers.</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 #: PO1267PC2 Condition No. 6</p>	<p>D. Frequency of monitoring: As Needed</p>
<p>B. Description: Additional Permit Requirements Condition No. 6 - Steam Boilers - Standby Service</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</p>
<p>C. Method of monitoring: Maintain records documenting the transition period during which the B&W boilers and the Gas Turbine are simultaneously operated.</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 #: PO1267PC2 Condition No. 7 & 8</p>	<p>D. Frequency of monitoring: Upon use</p>
<p>B. Description: Additional Permit Requirements Condition No. 7 - GE LM 2500-33 Gas Turbine Fuel Use Limits Condition No. 8 - Records</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</p>
<p>C. Method of monitoring: Maintain Records of fuel oil used. No fuel oil used this period.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: PO1267PC2 Condition No. 9</p>	<p>D. Frequency of monitoring: Annually</p>
<p>B. Description: Additional Permit Requirements Combustion Emission Units Condition No. 9 - Planned Shutdowns</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</p>
<p>C. Method of monitoring: Notified District by letter of planned shutdowns for calendar year.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 50</p>	<p>D. Frequency of monitoring: Annual Formal Survey Periodic visual observations</p>
<p>B. Description: Rule 50 Applicable Requirements Opacity</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</p>
<p>C. Method of monitoring: Routine surveillance and visible inspections. Records of visible emissions for a period or periods aggregating more than three (3) minutes in any one (1) hour including date, time, and identity of emissions unit.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 54.B.1</p>	<p>D. Frequency of monitoring: Annually</p>
<p>B. Description: Rule 54 Applicable Requirements Sulfur Compounds - Sulfur Emissions from Combustion Operations at Point of Discharge.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD Method 307-94.</p>
<p>C. Method of monitoring: Gas analysis demonstrating that natural gas burned has a sulfur content less than 236 ppm.</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 #: Rule 54.B.2</p>	<p>D. Frequency of monitoring: Annually</p>
<p>B. Description: Rule 54 Applicable Requirements Sulfur Compounds - Sulfur Dioxide Concentration</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable SO2 - BAAQMD Manual of Procedures, Vol. VI, Section 1, ground Level Monitoring for H2S and SO2.</p>
<p>C. Method of monitoring: Per District Memo dated May 23, 1996, CI Power maintains Sulfur analysis of all fuels that shows Sulfur content below 0.5%. This results in sulfur dioxide concentrations below 0.25 ppm averaged over one hour, or 0.04 ppm averaged over a 24-hour period, at ground level at any point at or beyond the property line.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

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

<p>A. Attachment # or Permit Condition #: Rule 57.1</p>	<p>D. Frequency of monitoring: Continuous.</p>
<p>B. Description: Rule 57 Applicable Requirements Combustion Contaminants - Specific - Fuel Burning Equipment</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</p>
<p>C. Method of monitoring: District analysis of Rule 57.1 compliance is based on EPA emission factors.</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 #: Rule 64.B.1</p>	<p>D. Frequency of monitoring: Annually</p>
<p>B. Description: Rule 64.B.1 Applicable Requirements Sulfur Content of Fuels - Gaseous Fuel Requirements</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable SCAQMD Method 307-94</p>
<p>C. Method of monitoring: Only burned PUC quality natural gas this period.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 64.B.2</p>	<p>D. Frequency of monitoring: Each delivery.</p>
<p>B. Description: Rule 64.B.2 Applicable Requirements Sulfur Content of Fuels - Solid or Liquid Fuel Requirements</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable ASTM D4294-98 or D2622-98</p>
<p>C. Method of monitoring: Maintain Records of sulfur content of fuels purchased. No solid or liquid fuel deliveries this period.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 74.6</p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: Rule 74.6 Applicable Requirements Surface Cleaning and Degreasing</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Note 3.</p>
<p>C. Method of monitoring: Routine surveillance of solvent cleaning activities. Maintain records of current solvent information including: 1) Name and Manufacturer's description. 2) Intended use at the facility. 3) ROC content and ROC composite pressure. 4) Mix Ratio if blended.</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 #: Rule 74.11</p>	<p>D. Frequency of monitoring: Not applicable</p>
<p>B. Description: Rule 74.11 Applicable Requirements Large Water Heaters and Small Boilers</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</p>
<p>C. Method of monitoring: Facility does not have any applicable equipment.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 74.22</p>	<p>D. Frequency of monitoring: Not applicable</p>
<p>B. Description: Rule 74.22 Applicable Requirements Natural Gas-Fired Fan-Type Central Furnaces.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</p>
<p>C. Method of monitoring: Facility does not have any applicable equipment.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 74.1</p>	<p>D. Frequency of monitoring: Not Applicable this period</p>
<p>B. Description: Rule 74.1 Applicable Requirements Abrasive Blasting</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable CCR Section 92400</p>
<p>C. Method of monitoring: Maintain Records of abrasive blasting performed on site. No abrasive blasting performed on site this period.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: Rule 74.2</p>	<p>D. Frequency of monitoring: Periodic</p>
<p>B. Description: Rule 74.2 Applicable Requirements Architectural Coatings</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See Note 4.</p>
<p>C. Method of monitoring: Routine surveillance of architectural coating operations. Maintain records of usage of architectural coatings.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 74.4.D</p>	<p>D. Frequency of monitoring: Not Applicable this period</p>
<p>B. Description: Rule 74.4.D Applicable Requirements Cutback Asphalt - Road Oils</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable ASTM D402</p>
<p>C. Method of monitoring: Maintain Records of ROC content in cutback asphalt used on site. No cutback asphalt used on site this period.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 40 CFR 61.M</p>	<p>D. Frequency of monitoring: Not applicable</p>
<p>B. Description: 40 CFR Part 61, Subpart M Applicable Requirements National Emission Standard for Asbestos</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable See 40 CFR 61.145</p>
<p>C. Method of monitoring: Maintain Records of asbestos demolition or renovation activities. No asbestos demolition or renovation performed this period.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: 40 CFR 68 RMP-1267</p>	<p>D. Frequency of monitoring: Not applicable</p>
<p>B. Description: 40 CFR Part 68 Applicable Requirements Accidental Release Prevention and Risk Management Plans</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</p>
<p>C. Method of monitoring: Effective 3/27/2009 the Facility de-registered from the 40 CFR Part 68 RMP by reducing on site inventory of all regulated substances below TQ's.</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 #: 40 CFR 82</p>	<p>D. Frequency of monitoring: Not Applicable this period</p>
<p>B. Description: 40 CFR Part 82 Applicable Requirements Protection of Stratospheric Ozone</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Not applicable</p>
<p>C. Method of monitoring: No servicing of motor (fleet) vehicles involving ozone- depleting substance refrigerants in the motor vehicle occurred. No maintenance, repair or disposal of appliances occurred.</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 #:</p>	<p>D. Frequency of monitoring:</p>
<p>B. Description:</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): _____ G. Compliance Status? (C or I): _____ H. *Excursions, exceedances, or other non-compliance? (Y or N): _____ *If yes, attach Deviation Summary Form</p>

NOTE	ATTACHMENT	
1	STRMLN1267-LM-2500-NOx, NH3, BOX E	NOx – EPA Method 20 O2 – ARB Method 100 NH3 – BAAQMD Method ST-1B Nat Gas HHV – ASTM D1826-88 Fuel Oil HHV – ASTM 240-87
2	STRMLN1267-LM-2500-Sox, Box E	Gaseous Fuel – SCAQMD Method 307-94 Fuel Oil – ASTM D4294-98 or D2622-98 Exhaust sulfur compounds – EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD 307-94, as appropriate.
3	Rule 74.6, Box E	ROC Content – EPA Test Method 24 Identity of solvent compounds – ASTM E168-67, ASTM E169-87, or ASTM E260-85 True VP or composite VP – ASTM D2879-86 or other methods per Rule 7436.G.5 Initial Boiling Point – ASTM 1078-78 or published source Spray Gun active/passive solvent losses – SCAQMD method (10-3-89)
4	Rule 74.2, Box E	VOC Content – EPA Method 24 or CARB Method 432 Acid Content – ASTM Method D1613-85 Metal Content – SCAQMD Method 311-91

Preventive Maintenance Work Order

Plant No: 000
 Work Order: P546483
 PM ID Number: 89
 Project ID:
 Slot Number:
 Asset Number: 45AD000

Date: 12/26/2019 00:02:56

Plan Priority: 2
 Safety: N
 Asset Type: Equipment
 Asset Code
 Work Location: PLANT MANAGER
 Origination Date: 12/26/2019 00:02
 Due Date: 1/24/2020
 Schedule Date:
 Completion Date:
 Work Area:
 Fault Code: EHS
 Work Type:
 Status: DO
 Compliance Type:
 Last PM Date: 01/24/2019

Asset Location: OFFICE
 Asset Short Desc: ADMINISTRATIVE
 Chg CC-Lab Acct: 5403.6-
 Originator: BEN BARRAZA 5
 Phone: 805-437-3797
 Work Group:
 Supervisor ID:
 Assigned To:
 Scheduled To:
 Planner:

Frequency Code: A2
 Work Requested: AIR PERMIT

Last PM Usage:

PER TITLE V PERMIT RULE 74.9.4, SEND LETTER DETAILING CALENDAR USAGE OF BSG OPERATIONS TO VCAPCD. LETTER DUE BY FEB 15.

*** VCAPCD will send form to Facility. Contact Chris Cote if report package has not arrived by Feb 1.

Sprrt Requirement:

Meter Reading: _____

CORRECTIVE ACTION

2/6/20 - CONTACTED ERIC WETHERBY @ VCAPCD. THIS PROGRAM HAS BEEN MERGED WITH THE ANNUAL COMPLIANCE CERTIFICATION SITE VISIT. DURING SITE VISIT, INSPECTOR WILL PROVIDE THE FORM. THERE WILL BE A 10 DAY WINDOW TO COMPLETE AND SUBMIT TO VCAPCD.

Completed By: JEFF

Completed Date: 2/6/20

SIGN OFF: Production / / :

Maintenance: / / :

Signed: _____

Signed: _____

STATUS CHANGES

Status: _____ Date: / / Time: :

Status: _____ Date: / / Time: :

LABOR

MATERIAL

Employee Id	Activity Code	Craft	Hours	Type	Stock No	Qty	Account
<u>3</u>			<u>1.25</u>	<u>R</u>			

**Emergency Standby Stationary Internal Combustion Engines
Attachment ATCM**

Emergency standby stationary internal combustion engines are subject to the permit conditions of this Attachment. Annual Compliance Certification consists of the following information.

Engine	Maintenance Operations	Permit Condition
Blackstart Generator	0.9 hours	< 20 hours per year

Emergency Standby Stationary Internal Combustion Engine Fuel Purchases

Date	Volume	Fuel Type

No Fuel Oil deliveries this period.



Letter of Conformance

April 4, 2019

This is to certify that the CARB Ultra Low sulfur dyed Diesel Fuel sold and delivered to

CALIFORNIA STATE UNIVERSITY CI on April 4th ,2019

Was in compliance with South Coast Air Quality Management District requirements for Ventura and Santa Barbara Counties. The test Results meet ASTM D-5453 and are Typical of all CARB Ultra Low Sulfur Dyed Diesel Fuel sold by SC Fuels. The sulfur Content is guaranteed to be less than .0015%. (15PPM) The high heat content is typically in the 19,950 - 20,200 BTU per pound range.

Hope Bowles

General Manager
SC Fuels
Oxnard Division
Office (805) 299-1219
b0\Vlesh@scfuels.co1n

3815 VINEYARD AYE, OXNARD, CA 93030*MAILING ADDRESS: P.O. UOX 50540, OXNARD, CA 93031-0540

**NESHAP Stationary Reciprocating Internal Combustion Engines
Attachment 40 CFR Part 63, Subpart ZZZZ**

Stationary reciprocating internal combustion engines are subject to the permit conditions of this Attachment. Annual Compliance Certification consists of the following information.

Engine	Maintenance Operations	Permit Condition
Blackstart Generator	1.9 hours	< 100 hours per year

Emergency Operations

Date / Time	Duration	Reason
04/07/19 10:00	87.4 Hours	SCE Line Maintenance, 66 KV Line Down.

Stationary Reciprocating Internal Combustion Maintenance Table

Maintenance Item	Periodicity
Oil & Oil Filter	Annually
Air Filter	Annually
Belts / Hoses	Annually

Preventive Maintenance Work Order

Plant No: 000
 Work Order: P546280
 PM ID Number: 92
 Project ID:
 Slot Number:
 Asset Number: 45BS100

Date: 11/28/2019 04:49:49

Plan Priority: 2
 Safety: N
 Asset Type: Equipment
 Asset Code
 Work Location: MECHANIC
 Origination Date: 11/28/2019 04:49
 Due Date: 12/27/2019
 Schedule Date:
 Completion Date:
 Work Area:
 Fault Code: N
 Work Type:
 Status: DO
 Compliance Type:

Asset Location: BLACKSTART GENERATOR
 Asset Short Desc: BLACKSTART ENGINE
 Chg CC-Lab Accl: 6810.12-
 Originator: MSADMIN 6
 Phone: 805-437-3797
 Work Group:
 Supervisor ID:
 Assigned To:
 Scheduled To:
 Planner:

Frequency Code: A1 Last PM Usage: Last PM Date: 12/27/2018
 Work Requested: TAG OUT BLACKSTART ENGINE AND GENERATOR IN ACCORDANCE WITH PLANT LOCKOUT/TAGOUT PROCEDURES REFER TO VENDOR MANUAL FOR SPECIFICATIONS ON THE FOLLOWING MAINTENANCE ITEMS:

1. Change fuel oil filters.
2. Change lubricating oil and filters.
3. Clean crank case breathers.
4. Inspect turbo chargers-see proc. (4-10)
5. Clean and inspect air filter.
6. Inspect Hoses and belts. Replace as needed.

NOTE: RUN ENGINE TO OPERATING TEMPERATURE BEFORE DRAINING OIL.

Sprpt Requirement: _____

Meter Reading: _____

CORRECTIVE ACTION

No Filter Change - _____

Completed By: Raul _____

Completed Date: 12/21/19

SIGN OFF: Production / / _____

Maintenance: _____

Signed: _____

Signed: 

STATUS CHANGES

Status: _____ Date: ___/___/___ Time: ___:___

Status: _____ Date: ___/___/___ Time: ___:___

LABOR

MATERIAL

Employee Id	Activity Code	Craft	Hours	Type	Stock No	Qty	Account
<u>0</u>			<u>1.6</u>				

LubeWatch[®]

Maintenance Management System

UIN 010466A

Diesel Engine
Blackstart

Unit No.

Unit:

Make

Model

Serial No.

Site

Compartment:

Name Diesel Engine

Make Detroit Diesel

Model 16V71

Serial No.

Capacity:





Customer:

CALIFORNIA STATE UNIVERSITY CI
1947 W Potrero Rd
Camarillo CA 93012
USA





All wear rates normal. Abrasive and other contaminant levels are acceptable. Viscosity within specified operating range. Action: Resample next service interval to further monitor.

DIAGNOSIS

ANALYST: Sam Smith Phoenix

	Normal
	Abnormal
	Caution
	Severe

LEGEND

	Normal
	Caution
	Abnormal
	Severe

DATE SAMPLED	31-Oct-19	01-Nov-17	23-Aug-17	08-Feb-17	03-Nov-16
DATE RECEIVED	31-Oct-19	08-Nov-17	29-Aug-17	14-Feb-17	10-Nov-16
DATE REPORTED	01-Nov-19	09-Nov-17	29-Aug-17	15-Feb-17	11-Nov-16
LAB NO.	44022123491	44021712532	44021672380	44021562264	44021515046
SIF NO.	33961127	32788831	16171416	16171414	16171415
TIME ON UNIT	Hrs				
TIME ON OIL	Hrs				
OIL BRAND	Chevron	Chevron	Chevron	Chevron	Chevron
OIL TYPE	Delo 400	Delo 400	Delo 400	Delo 400	Delo 400
OIL GRADE	SAE 40	SAE 40	SAE 40	SAE 40	SAE 40
OIL ADDED					
FILTER					
OIL CHANGED	Not Changed	Not Changed	Not Changed	Not Changed	Not Changed
WO NUMBER					

Metals (ppm)					
Iron (Fe)	10	4	4	4	4
Chromium (Cr)	<1	<1	<1	<1	<1
Lead (Pb)	1	<1	<1	<1	<1
Copper (Cu)	2	<1	<1	<1	<1
Tin (Sn)	1	<1	<1	<1	<1
Aluminium (Al)	1	1	1	1	1
Nickel (Ni)	<1	<1	<1	<1	<1
Silver (Ag)	<1	<1	<1	<1	<1
Titanium (Ti)	<1	<1	<1	<1	<1
Vanadium (V)	<1	<1	<1	<1	<1

Contaminants (ppm)					
Silicon (Si)	10	12	12	12	13
Sodium (Na)	4	4	4	3	3
Potassium (K)	5	<1	<1	1	1

Additives (ppm)					
Magnesium (Mg)	49	17	16	16	16
Calcium (Ca)	3541	3599	3532	3496	3632
Barium (Ba)	<1	<1	<1	<1	<1
Phosphorus (P)	1011	1015	1020	1017	1092
Zinc (Zn)	1153	1202	1165	1149	1189
Molybdenum (Mo)	49	45	51	49	52
Boron (B)	414	456	456	462	476

Contaminants					
Water (%)	<0.05	<0.05	<0.05	<0.05	<0.05
Coolant	No	No	No	No	No

Physical Tests					
Viscosity (cSt 100C)	13.8	14.0	14.2	14.6	14.2
Fuel (%)	<1.0	<1	<1	<1	<1
Soot (%) Infrared	<0.1	<0.1	0.3	0.6	0.4

Physical / Chemical					
Base Number (mgKOH/g)	8.6	8.7	9.6	9.6	2.9
Oxidation (Abs/0.1mm)	8	9	8	12	<1
E2412/D7414					



(800) LUBE-808



LubeWatch®

Maintenance Management System

(800) LUBE-808

UIN 010466A

U.S. Laboratories

Atlanta, Georgia - 420
 3121 Presidential Drive
 Atlanta, GA 30340
 800.394.3669

Valley View, Ohio - 410
 6180 Halle Dr, Suite O
 Valley View, OH 44125
 800.726.5400

Kansas City, Kansas - 430
 935 Sunshine Road
 Kansas City, KS 66115
 800.332.9055

Phoenix, Arizona - 440
 3319 West Earl Drive
 Phoenix, AZ 85017
 800.445.7930

Portland, Oregon - 401

4843 NW Front Avenue
 Portland, OR 97210
 800.770.4128

Canadian Laboratories

Burlington, Ontario - 450
 5036 South Service Rd.
 Burlington, ON L7L5Y7
 905.332.9559

Edmonton, Alberta - 402
 10717-176 Street
 Edmonton, AB T5S 1K1
 855.489.0057

Sales & Marketing

Houston, Texas
 10450 Stanciliff Road, Suite 210
 Houston, TX 77099
 977.835.8437

International Locations

Australia

Brisbane, Perth, Sydney, Muswellbrook

South America

Santiago de Chile, Belo Horizonte, Brazil

New Zealand

Wellington

Southeast Asia

Kuala Lumpur, Singapore

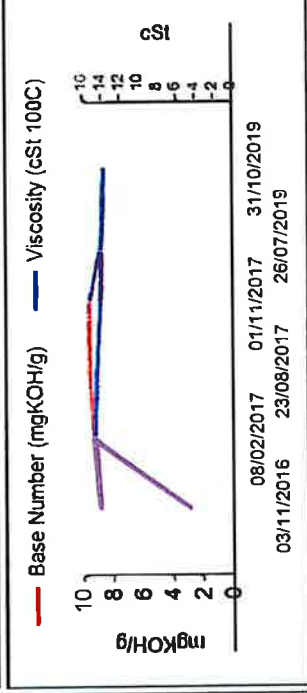
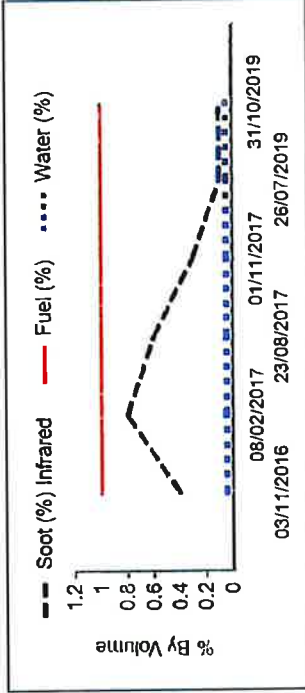
Europe

Prague

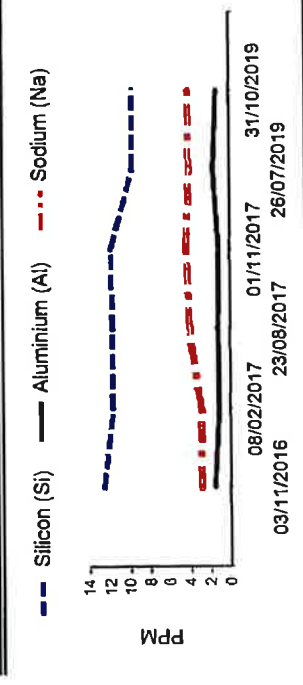
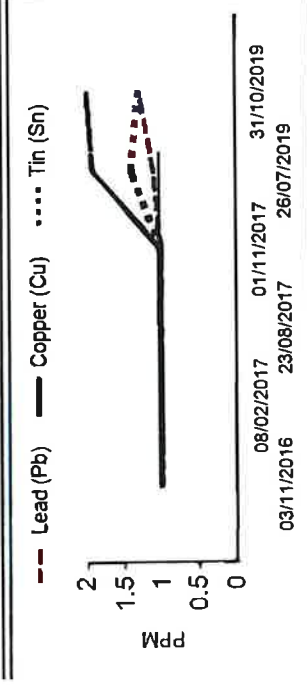
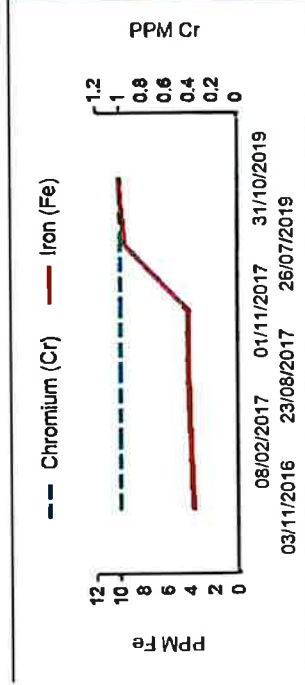
TEST METHODS:

Acid Number:	ASTM D974/D664 (*M)
Base Number:	ASTM D4739 (*M)
Base Number (Perchloric):	ASTM D2896 (*M)
Fuel Dilution by GC:	ASTM D7593
Fuel Dilution Visc/Settflash	In House
Fuel Soot ATR/IR:	ASTM D7686 (*M)
Soot by FTIR:	ASTM D7814
Glycol:	In House
Metals by ICP AES:	ASTM D5185 (*M)
Ox. NOx, SOx, FTIR:	ASTM D7418/D7414/D7415 D7624
PQ Index:	ASTM D8120 (*M)
Particle Count:	ASTM D7647 (*M) / ISO 4406
Viscosity:	ASTM D445 (*M) / D7279 (*M)
Water KF:	D6304C / E203 (*M)
Water Crackle:	In House

*M - Modified Method



Filter patch test is not performed Contact laboratory for more information



Since services are based on samples and information supplied by others, and since corrective actions, if any, are necessarily taken by others, these services are rendered without any warranty or liability of any kind beyond the actual amount paid to ALS Tribology for the services. Reported recommendations are based on interpretations of the generated test results and historical data. Certain test results appearing in this report may have been tested at other ALS laboratories within the Tribology divisional network.

California State University CI
 Attn: Jeff Smith
 1947 W Potrero Rd
 Camarillo CA 93012
 USA



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: HX002 Per Attachment 74.15.N1			B. Pollutant: NOx
C. Measured Emission Rate: 32.3 ppmvd @ 3.0% O2	D. Limited Emission Rate: 40 ppmvd @ 3.0% O2	E. Specific Source Test or Monitoring Record Citation: PTO #1267	F. Test Date: 10/24/18

A. Emission Unit Description: HX002 Per Attachment 74.15.N1			B. Pollutant: CO
C. Measured Emission Rate: 33.8 ppmvd @ 3.0% O2	D. Limited Emission Rate: 400 ppmvd @ 3.0% O2	E. Specific Source Test or Monitoring Record Citation: PTO #1267	F. Test Date: 10/24/18

A. Emission Unit Description: HX003 Per Attachment 74.15.N1			B. Pollutant: NOx
C. Measured Emission Rate: 32.7 ppmvd @ 3.0% O2	D. Limited Emission Rate: 40 ppmvd @ 3.0% O2	E. Specific Source Test or Monitoring Record Citation: PTO #1267	F. Test Date: 10/24/18

A. Emission Unit Description: HX003 Per Attachment 74.15.N1			B. Pollutant: CO
C. Measured Emission Rate: 7.6 ppmvd @ 3.0% O2	D. Limited Emission Rate: 400 ppmvd @ 3.0% O2	E. Specific Source Test or Monitoring Record Citation: PTO #1267	F. Test Date: 10/24/18

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:



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: GE LM2500-33 Natural Gas Fired Turbine Per Attachment STRMLN1267-LM-2500-NOx,NH3			B. Pollutant: NOx
C. Measured Emission Rate: 7.2 ppmvd @ 15.0% O2	D. Limited Emission Rate: 9 ppmvd @ 15.0% O2	E. Specific Source Test or Monitoring Record Citation: PTO #1267	F. Test Date: 10/23/18

A. Emission Unit Description: GE LM2500-33 Natural Gas Fired Turbine Per Attachment STRMLN1267-LM-2500-NOx,NH3			B. Pollutant: NH3
C. Measured Emission Rate: 7.4 ppmvd @ 15.0% O2	D. Limited Emission Rate: 20 ppmvd @ 15.0% O2	E. Specific Source Test or Monitoring Record Citation: PTO #1267	F. Test Date: 10/23/18

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:

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:

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:

Preventive Maintenance Work Order

Plant No: 000
 Work Order: P545856
 PM ID Number: 141
 Project ID:
 Slot Number:
 Asset Number: 45AD000

Date: 9/19/2019 04:36:17

Plan Priority: 2
 Safety: N
 Asset Type: Equipment
 Asset Code

Asset Location: OFFICE
 Asset Short Desc: ADMINISTRATIVE
 Chg CC-Lab Acct: 6610,00-
 Originator: RAUL PEREZ
 Phone: 805-437-3797
 Work Group:
 Supervisor ID:
 Assigned To:
 Scheduled To:
 Planner:

Work Location: PLANT MANAGER
 Origination Date: 9/19/2019 04:36
 Due Date: 11/1/2019
 Schedule Date:
 Completion Date:
 Work Area:
 Fault Code: EHS
 Work Type:
 Status: DO
 Compliance Type:

Frequency Code: A7
 Work Requested: AIR PERMIT

Last PM Usage:

Last PM Date: 11/01/2018

SOURCE TESTING FOR GAS TURBINE NEEDS TO BE SCHEDULED. NOTIFY DANIEL--GHO AT
 VCAPCD OF TEST DATES. *ED SIVEDI*

Delta Air Quality Services - Matt McCune 714-279-6777

Sprpt Requirement:

Meter Reading: _____

CORRECTIVE ACTION

*SENT LETTER TO VCAPCD REQUESTING A WAIVER FOR THIS YEARS
 SOURCE TEST ON 9/24/19. SPOKE WITH ED SIVEDI ABOUT
 STATUS OF REQUEST 9/24/19. REQUEST WAS GRANTED AND HAS
 BEEN LOGGED INTO THE AIR DISTRICTS TRACKING SYSTEM.*

Completed By: JEFF

Completed Date: 9/24/19

SIGN OFF: Production / / :

Maintenance: / / :

Signed: _____

Signed: _____

STATUS CHANGES

Status: _____ Date: / / Time: _____

Status: _____ Date: / / Time: _____

LABOR

MATERIAL

Employee Id	Activity Code	Craft	Hours	Type	Stock No	Qty	Account
<u>JES</u>			<u>2.0</u>	<u>R</u>			



August 28, 2019

Ventura County Air Pollution Control District
Attn: Ed Swede
669 County Square Drive
Ventura, CA 93003

Subject: 2019 Compliance Testing for Gas Turbine.

Mr. Swede,

CI Power is requesting that the 2019 Compliance and RATA Testing as required by Permit 01267 Attachment STRMLN1267LM2500-NOxNH3 Condition 5 on the GE LM2500 Turbine be waived due to the unit operating less than 200 hours this past calendar year. VCAPCD Stationary Gas Turbines Rule 74.23 C.l.c. provides an exemption for units that have run less than 200 hours per calendar year.

Attached is the fuel usage and run hours information that support the triggering of the <200 hour exemption.

Sincerely,

Ms. Ysabel Trinidad
Vice President

Attachments: Rolling 12 Month Emissions Calculations, 9/1/18 through 8/27/19.
Rolling 12 Month Hours Calculations, 9/1/18 through 8/27/19.



Ventura County
Air Pollution
Control District

**RESPONSIBLE OFFICIAL'S
CERTIFICATION FORM**

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

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

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

Certification by Responsible Official

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

<p>Signature and Title of Responsible Official:</p> <p>Signature: <u>[Handwritten Signature]</u></p> <p>Title: <u>VP, BUS & FIN AFFAIRS</u></p>	<p>Date: <u>8/30/19</u></p>
---	-----------------------------

**CI POWER COGENERATION PLANT
ROLLING TWELVE-MONTH EMISSIONS CALCULATIONS**

CI Power Emissions Report 2013 through August 27, 2019

1. GE LM-2500-33 GAS TURBINE (Permit to Operate #1267)

	1	2	3	4	5	6	7	8	9	10	11	12
Month	Sept-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19
Fuel Gas (MMCF)	2.05	12.62	1.71	0.00	2.00	1.20	1.77	0.00	0.00	2.07	1.92	0.53
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	0.00	179.21	16.52	0.00	0.00	39.59	25.05	0.00	0.00	28.46	27.19	12.14
NOx	0	271.5	32.56	0	0	52.11	32.21	0	0	40.17	37.30	14.12
PM	0.00	77.25	7.98	0.00	0.00	17.07	10.80	0.00	0.00	12.27	11.70	5.23
SOx	0.00	7.60	0.79	0.00	0.00	1.68	1.06	0.00	0.00	1.21	1.15	0.51
CO	0.00	669.08	69.13	0.00	0.00	147.83	93.54	0.00	0.00	106.27	101.37	45.33
NH3 Usage (MMCF)	0.000	17.347	1.531	0.000	0.000	3.333	2.211	0.000	0.000	2.210	2.032	1.049

GE LM-2500-33 GAS TURBINE			
EMISSION SUBTOTALS		EMISSION FACTORS	
23.33 MMCF		GAS	FUEL OIL
0.00 MMCF		LBS/MMCF	LBS/MGAL
330.12 LBS	0.17 TONS	14.15	1.84
471.98 LBS	0.24 TONS	CEM	CEM
142.31 LBS	0.07 TONS	6.10	3.10
14.00 LBS	0.01 TONS	0.60	24.41
1232.54 LBS	0.62 TONS	52.83	4.49

2. BABCOCK & WILCOX STEAM BOILERS (Permit to Operate #1267)

	1	2	3	4	5	6	7	8	9	10	11	12
Month	Sept-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19
Fuel Gas (MMCF)	6.1456	8.5521	5.1223	5.2856	7.5770	7.0589	6.2211	5.2300	7.5014	6.3413	5.2574	5.1018
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	82.68	88.13	79.79	110.38	101.51	100.27	70.39	70.97	101.30	92.01	84.16	68.62
NOx	313.07	333.76	302.19	418.08	384.45	379.76	266.57	268.75	383.65	348.48	318.75	259.89
PM	46.71	49.90	45.08	62.37	57.36	56.66	39.77	40.10	57.24	51.99	47.56	38.77
SOx	3.69	3.93	3.56	4.92	4.53	4.47	3.14	3.17	4.52	4.10	3.75	3.06
CO	1909.23	2031.15	1838.98	2544.14	2339.63	2311.04	1622.26	1635.72	2334.73	2120.72	1939.79	1581.56

BABCOCK & WILCOX BOILERS			
EMISSION SUBTOTALS		EMISSION FACTORS	
78.08 MMCF		GAS	FUEL OIL
0.00 MMCF		LBS/MMCF	LBS/MGAL
1050.18 LBS	0.53 TONS	13.45	1.60
3977.42 LBS	1.99 TONS	50.94	20.74
593.41 LBS	0.30 TONS	7.60	2.00
46.85 LBS	0.02 TONS	0.60	24.41
24204.96 LBS	12.10 TONS	310.00	43.92

REFERENCE: Annual Emission Limits and Emission Factors from Title V Permit Attachment PO1267PC2

PERMITTED CONDITIONS (PER YEAR)	
ROC	14.68 TONS
NOx	33.38 TONS
PM	8.73 TONS
SOx	25.01 TONS
CO	57.59 TONS

EMISSION TOTALS	
ROC	1380.31 LBS / 0.69 TONS
NOx	4449.40 LBS / 2.22 TONS
PM	735.73 LBS / 0.37 TONS
SOx	60.85 LBS / 0.03 TONS
CO	25437.50 LBS / 12.72 TONS

3. EMERGENCY GENERATOR OPERATING HOURS. (Permit to Operate #1267)

	1	2	3	4	5	6	7	8	9	10	11	12
Month	Sept-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19
Maintenance	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Emergency	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

TOTAL HOURS
1.30 HOURS
88.10 HOURS

REFERENCE: Airborne Toxic Control Measure For Stationary Compression Engines, Attachment ATCM In-Use Emergency Engines

PERMITTED LIMITS	
Maintenance	20.00 HOURS
Emergency	N/A HOURS

September 1, 2018 - August 27, 2019

CI POWER COGENERATION PLANT

GAS TURBINE RUN HOURS

DATE	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	DATE
	0	0	0	0	0	0	0	0	0	0	0	0	1
	0	0	0	0	0	0	0	0	0	0	0	0	2
	0	0	0	0	0	0	0	0	0	0	0	0	3
	0	0	0	0	0	0	0	0	0	0	0	0	4
	0	0	6.17	0	0	0	0.17	0	0	4.47	0	0	5
	0	0	0	0	0	6.72	0	0	0	0	0	0	6
	0	0	0	0	0	0	0	0	0	0	0	0	7
	0	0	0	0	0	0	0	0	0	0	0	0	8
	0	0	0	0	0	0	0	0	0	0	0	0	9
	0	0	0	0	0	0	0	0	0	0	0	0	10
	0	7.17	0	0	0	0	0	0	0	0	0	0	11
	0	0	0	0	0	0	0	0	0	0	0	0	12
	0	0	0	0	0	0	0	0	0	5.51	0	0	13
	0	0	0	0	0	0	0	0	0	0	0	0	14
	0	0	0	0	0	0	0	0	0	0	0	0	15
	0	6.2	0	0	0	0	0	0	0	0	0	0	16
	0	0	0	0	0	0	0	0	0	0	0	0	17
	0	0	0	0	0	0	0	0	0	0	0	0	18
	0	0	0	0	0	6.13	0	0	0	0	0	0	19
	0	5.4	0	0	0	0	0	0	0	0	0	0	20
	0	6.42	0	0	0	0	0	0	0	0	0	0	21
	0	6.43	0	0	0	0	0	0	0	0	0	0	22
	0	14.32	0	0	0	0	0	0	0	0	0	0	23
	0	5.42	0	0	0	0	0	0	0	0	0	0	24
	0	5.44	0	0	0	0	0	0	0	0	4.58	0	25
	0	0	0	0	0	0	0	0	0	0	0	0	26
	0	0	0	0	0	0	0	0	0	0	0	0	27
	0	0	0	0	0	0	0	0	0	0	0	0	28
	0	0	0	0	0	0	0	0	0	0	4.43	0	29
	0	0	0	0	0	0	0	0	0	0	0	0	30
	0	0	0	0	0	0	0	0	0	0	0	0	31
Total	3.22	27.30	5.17	0.00	0.00	12.35	3.17	0.00	0.00	9.93	9.11	4.22	Annual Hours
													108.30

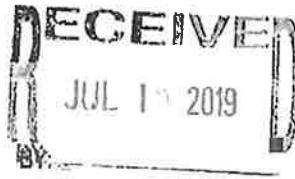
**GE LM 2500-33 Gas Turbine Based Cogeneration Unit
Attachment STRMLN1267LM2500-NO_xNH₃**

GE LM 2500-33 Gas Turbine is subject to the permit conditions of this Attachment. Annual Compliance Certification includes the following information.

List of CEM Breakdowns

Date	Time	Description	Excess Emissions

No breakdowns this reporting period.



4100 Burr St
 Bakersfield CA 93308
 661-324-1317
 661-324-2746

C.I. Power
 Attn: Margaret
 1947 W. Potrero Rd.
 Camarillo, CA 93012

Sampled: 7/09/2019
 Submitted: 7/09/2019
 Analyzed: 7/11/2019
 Reported: 7/12/2019

Gas Analysis by Chromatography - ASTM D 1945/D 3588

Company:	CI Power	Lab No.:	190451-1
Location:	Camarillo	Pressure:	243 psi
Description:	Cogen Fuel Gas	Temperature:	64 °F

Component	Mole %	Weight %	GIMCF	
Oxygen	ND	0.00		
Nitrogen	0.72	1.20		
Carbon Dioxide	ND	0.00		
Hydrogen	ND	0.00		
Carbon Monoxide	ND	0.00		
Methane	94.94	90.92		
Ethane	4.23	7.59		
Propane	0.11	0.29	0.031	
iso-Butane	ND	0.00	0.000	
n-Butane	ND	0.00	0.000	
iso-Pentane	ND	0.00	0.000	
n-Pentane	ND	0.00	0.000	
Hexanes Plus	ND	0.00	0.000	
Totals	100.00	100.00	0.031	
Specific Volume, ft ³ /lb	22.65	Values Corrected		
Compressibility (Z) Factor	0.9979	for Compressibility	CHONS	Weight %
Specific Gravity, Calculated	0.5784	0.5795	Carbon	74.371
GROSS				
BTU/ft ³ Dry	1036.6	1038.8	Hydrogen	24.429
BTU/ft ³ Wet	1018.4	1020.6	Oxygen	0.000
BTU/lb Dry	23479.1	23529.7	Nitrogen	1.200
BTU/lb Wet	23068.3	23117.9	Sulfur	0.000
NET				
BTU/ft ³ Dry	934.4	936.4	F FACTOR @	8622
BTU/ft ³ Wet	918.1	920.1	60 deg F, dscMWBtu	
BTU/lb Dry	21166.0	21211.6	F FACTOR @	8493
BTU/lb Wet	20795.6	20840.4	60 deg F, dscMWBtu	
Hydrogen Sulfide, ppm		TR<1	Method	ASTM D 4810
Dew Point, deg F		Not Tested	Method	Bureau of Mines
Moisture, lbs H ₂ O/MIMCF		Not Tested	Method	Bureau of Mines
ND Not a Det				
Tr Trace				

**CI POWER COGENERATION PLANT
ROLLING TWELVE-MONTH EMISSIONS CALCULATIONS**

1. GE LM-2500-33 GAS TURBINE (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
May-18	0.00	1.12	22.51	11.72	0.00	12.66	1.31	0.00	0.00	2.80	1.77	0.00
Fuel Gas (MMCF)	0	0	0	0	0	0	0	0	0	0	0	0
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	0.00	15.91	318.56	165.80	0.00	179.21	18.52	0.00	0.00	39.59	25.05	0.00
NOx	0	20.84	432.64	224.87	0	273.25	20.65	0	0	58.91	37.41	0
PM	0.00	6.86	137.33	71.48	0.00	77.25	7.98	0.00	0.00	17.07	10.80	0.00
SOx	0.00	0.67	13.51	7.03	0.00	7.60	0.79	0.00	0.00	1.68	1.06	0.00
CO	0.00	59.40	1189.38	619.04	0.00	669.08	69.13	0.00	0.00	147.83	93.54	0.00
NH3 Usage (MMCF)	0.000	1.631	27.135	13.481	0.000	17.347	1.931	0.000	0.000	3.888	2.331	0.000

EMISSION SUBTOTALS		EMISSION FACTORS	
		GAS	FUEL OIL
53.90	MMCF		
0.00	MMCF	LBS/MMCF	LBS/MGAL
762.66	LBS	0.38 TONS	14.15
1068.82	LBS	0.53 TONS	1.94
328.77	LBS	0.16 TONS	3.10
32.34	LBS	0.02 TONS	0.60
2847.40	LBS	1.42 TONS	52.83

2. BABCOCK & WILCOX STEAM BOILERS (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
May-18	6.8233	5.906	6.4407	6.7125	6.1459	6.5521	5.9322	8.2069	7.5472	7.4550	5.2331	5.2765
Fuel Gas (MMCF)	0	0	0	0	0	0	0	0	0	0	0	0
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	91.77	79.44	86.63	90.28	82.66	88.13	79.79	110.38	101.51	100.27	70.39	70.97
NOx	347.58	300.85	328.09	341.93	313.07	333.76	302.19	418.06	384.45	379.76	266.57	268.79
PM	51.86	44.89	48.95	51.02	46.71	49.80	45.08	62.37	57.36	56.66	39.77	40.10
SOx	4.09	3.54	3.86	4.03	3.69	3.93	3.56	4.92	4.53	4.47	3.14	3.17
CO	2115.22	1830.86	1996.62	2080.88	1905.23	2031.15	1838.98	2544.14	2339.63	2311.04	1622.26	1635.72

EMISSION SUBTOTALS		EMISSION FACTORS	
		GAS	FUEL OIL
78.23	MMCF		
0.00	MMCF	LBS/MMCF	LBS/MGAL
1052.21	LBS	0.53 TONS	13.45
3985.11	LBS	1.99 TONS	50.94
594.56	LBS	0.30 TONS	7.60
46.94	LBS	0.02 TONS	0.60
24251.73	LBS	12.13 TONS	310.00

REFERENCE: Annual Emission Limits and Emission Factors from Title V Permit
Attachment PO1267PC2

PERMITTED CONDITIONS (PER YEAR)	ROC	NOx	PM	SOx	CO
	14.88 TONS	33.38 TONS	8.73 TONS	25.01 TONS	57.59 TONS
	0.91 TONS	2.53 TONS	0.46 TONS	0.04 TONS	13.55 TONS

3. EMERGENCY GENERATOR OPERATING HOURS. (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
May-18	0.10	0.00	0.20	0.00	0.20	0.00	0.00	0.00	0.00	0.20	0.00	0.00
Maintenance	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.70	87.40
Emergency												

TOTAL HOURS
0.90 HOURS
88.10 HOURS

REFERENCE: Airborne Toxic Control Measure For Stationary Compression Engines.
Attachment ATCM In-Use Emergency Engines

PERMITTED LIMITS	HOURS
Maintenance	20.00 HOURS
Emergency	N/A

**CI POWER COGENERATION PLANT
ROLLING TWELVE-MONTH EMISSIONS CALCULATIONS**

1. GE LM-2500-33 GAS TURBINE (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	1.12	22.51	11.72	0.00	12.66	1.31	0.00	0.00	2.80	1.77	0.00	0.00
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	15.91	318.56	165.80	0.00	179.21	18.52	0.00	0.00	39.59	25.05	0.00	0.00
NOx	20.84	432.64	224.87	0	273.5	20.65	0	0	58.91	37.41	0	0
PM	6.86	137.33	71.48	0.00	77.25	7.98	0.00	0.00	17.07	10.80	0.00	0.00
SOx	0.67	13.51	7.03	0.00	7.60	0.79	0.00	0.00	1.68	1.06	0.00	0.00
CO	59.40	1189.38	619.04	0.00	669.08	69.13	0.00	0.00	147.83	93.54	0.00	0.00
NH3 Usage (MMCF)	1.631	27.135	13.481	0.000	17.347	1.931	0.000	0.000	3.888	2.331	0.000	0.000

GE LM-2500-33 GAS TURBINE			
EMISSION SUBTOTALS		EMISSION FACTORS	
		GAS	FUEL OIL
53.90	MMCF		
0.00	MMCF	LBS/MMCF	LBS/MGAL
762.65	LBS	0.38 TONS	1.84
1068.82	LBS	0.53 TONS	CEM
328.77	LBS	0.16 TONS	CEM
32.34	LBS	0.02 TONS	0.60
2847.40	LBS	1.42 TONS	52.83
			4.45

2. BABCOCK & WILCOX STEAM BOILERS (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	5.906	6.4407	6.7125	6.1456	6.5521	5.9322	8.2069	7.5472	7.4550	5.2331	5.2765	7.5314
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	79.44	86.63	90.28	82.66	88.13	79.79	110.38	101.51	100.27	70.39	70.97	101.30
NOx	300.85	328.09	341.93	313.07	333.76	302.19	418.06	384.45	379.78	266.57	268.79	383.65
PM	44.89	48.95	51.02	46.71	49.80	45.08	62.37	57.36	56.66	39.77	40.10	57.24
SOx	3.54	3.86	4.03	3.69	3.93	3.56	4.92	4.53	4.47	3.14	3.17	4.52
CO	1830.86	1996.62	2080.88	1905.23	2031.15	1838.98	2644.14	2339.63	2311.04	1622.26	1635.72	2334.73

BABCOCK & WILCOX BOILERS			
EMISSION SUBTOTALS		EMISSION FACTORS	
		GAS	FUEL OIL
78.94	MMCF		
0.00	MMCF	LBS/MMCF	LBS/MGAL
1061.74	LBS	0.53 TONS	1.60
4021.18	LBS	2.01 TONS	50.94
599.94	LBS	0.30 TONS	7.60
47.36	LBS	0.02 TONS	0.60
24471.24	LBS	12.24 TONS	310.00
			43.92

REFERENCE: Annual Emission Limits and Emission Factors from Title V Permit
Attachment PO1267PC2

PERMITTED CONDITIONS (PER YEAR)
ROC 14.88 TONS
NOx 33.38 TONS
PM 8.73 TONS
SOx 25.01 TONS
CO 57.59 TONS

EMISSION TOTALS
ROC 1824.38 LBS 0.91 TONS
NOx 5090.00 LBS 2.54 TONS
PM 928.71 LBS 0.46 TONS
SOx 79.70 LBS 0.04 TONS
CO 27318.64 LBS 13.66 TONS

3. EMERGENCY GENERATOR OPERATING HOURS. (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Maintenance	0.00	0.20	0.00	0.20	0.00	0.20	0.00	0.00	0.20	0.00	0.00	0.30
Emergency	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.70	87.40	0.00

TOTAL HOURS
1.10 HOURS
88.10 HOURS

REFERENCE: Airborne Toxic Control Measure For Stationary Compression Engines.
Attachment ATCM In-Use Emergency Engines

PERMITTED LIMITS
Maintenance 20.00 HOURS
Emergency N/A HOURS

**CI POWER COGENERATION PLANT
ROLLING TWELVE-MONTH EMISSIONS CALCULATIONS**

1. GE LM-2500-33 GAS TURBINE (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	22.51	11.72	0.00	12.66	1.31	0.00	0.00	2.80	1.77	0.00	0.00	2.01
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	318.56	165.80	0.00	179.21	18.52	0.00	0.00	39.59	25.05	0.00	0.00	28.46
NOx	432.64	224.87	0	273.5	20.65	0	0	58.91	37.41	0	0	40.17
PM	137.33	71.48	0.00	77.25	7.98	0.00	0.00	17.07	10.80	0.00	0.00	12.27
SOx	13.51	7.03	0.00	7.60	0.79	0.00	0.00	1.68	1.06	0.00	0.00	1.21
CO	1199.38	619.04	0.00	669.08	69.13	0.00	0.00	147.83	93.54	0.00	0.00	106.27
NH3 Usage (MMCF)	27.135	13.481	0.000	17.347	1.931	0.000	0.000	3.888	2.331	0.000	0.000	3.312

GE LM-2500-33 GAS TURBINE		EMISSION FACTORS	
EMISSION SUBTOTALS		GAS	FUEL OIL
		LBS/MMCF	LBS/MGAL
Fuel Gas	54.78 MMCF	0.39 TONS	1.84
Fuel Oil	0.00 Mgal	0.54 TONS	1.84
ROC	775.20 LBS	0.17 TONS	3.10
NOx	1088.15 LBS	0.02 TONS	24.41
PM	334.19 LBS	0.02 TONS	4.45
SOx	32.87 LBS	1.45 TONS	
CO	2694.26 LBS		

2. BABCOCK & WILCOX STEAM BOILERS (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	6.4407	6.7125	6.1459	6.5521	5.9322	8.2069	7.5472	7.4550	5.2331	5.2765	7.5314	6.8410
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	86.63	90.28	82.66	88.13	79.79	110.38	101.51	100.27	70.39	70.97	101.30	92.01
NOx	328.09	341.93	313.07	333.76	302.19	418.06	384.45	379.76	266.57	266.79	383.65	348.48
PM	48.95	51.02	46.71	49.80	45.08	62.37	57.36	56.66	39.77	40.10	57.24	51.99
SOx	3.86	4.03	3.69	3.93	3.56	4.92	4.53	4.47	3.14	3.17	4.52	4.10
CO	1996.62	2080.88	1905.23	2031.15	1838.98	2544.14	2339.63	2311.04	1622.26	1635.72	2334.73	2120.72

BABCOCK & WILCOX BOILERS		EMISSION FACTORS	
EMISSION SUBTOTALS		GAS	FUEL OIL
		LBS/MMCF	LBS/MGAL
Fuel Gas	79.87 MMCF	0.54 TONS	1.60
Fuel Oil	0.00 Mgal	2.03 TONS	20.74
ROC	1074.31 LBS	0.30 TONS	2.00
NOx	4068.81 LBS	0.02 TONS	24.41
PM	607.05 LBS	12.38 TONS	
SOx	47.92 LBS		
CO	24761.10 LBS		

PERMITTED CONDITIONS (PER YEAR)
ROC
NOx
PM
SOx
CO

EMISSION TOTALS

ROC	1849.51 LBS	0.92 TONS
NOx	5156.96 LBS	2.58 TONS
PM	941.23 LBS	0.47 TONS
SOx	80.80 LBS	0.04 TONS
CO	27655.36 LBS	13.83 TONS

REFERENCE: Annual Emission Limits and Emission Factors from Title V Permit
Attachment PO1267PC2

3. EMERGENCY GENERATOR OPERATING HOURS. (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Maintenance	0.20	0.00	0.20	0.00	0.20	0.00	0.00	0.20	0.00	0.00	0.30	0.00
Emergency	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.70	87.40	0.00	0.00

TOTAL HOURS
1.10 HOURS
88.10 HOURS

REFERENCE: Airborne Toxic Control Measure For Stationary Compression Engines.
Attachment ATCM In-Use Emergency Engines

PERMITTED LIMITS	HOURS
Maintenance	20.00 HOURS
Emergency	N/A HOURS

**CI POWER COGENERATION PLANT
ROLLING TWELVE-MONTH EMISSIONS CALCULATIONS**

1. GE LM-2500-33 GAS TURBINE (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	11.72	0.00	12.66	1.31	0.00	0.00	2.90	1.77	0.00	0.00	2.01	1.92
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	165.80	0.00	179.21	18.52	0.00	0.00	39.59	25.05	0.00	0.00	28.46	27.15
NOx	224.87	0.00	273.5	20.65	0	0	58.91	37.41	0	0	40.17	27.16
PM	71.48	0.00	77.25	7.98	0.00	0.00	17.07	10.80	0.00	0.00	12.27	11.70
SOx	7.03	0.00	7.60	0.79	0.00	0.00	1.68	1.06	0.00	0.00	1.21	1.15
CO	619.04	0.00	669.08	69.13	0.00	0.00	147.83	93.54	0.00	0.00	106.27	101.37
NH3 Usage (MMCF)	13.481	0.000	17.347	1.931	0.000	0.000	3.888	2.331	0.000	0.000	3.312	2.362

GE LM-2500-33 GAS TURBINE		
EMISSION SUBTOTALS		EMISSION FACTORS
34.19	MMCF	GAS
0.00	MMCF	FUEL OIL
483.79	LBS	LBS/MMCF
682.67	LBS	LBS/MGAL
208.56	LBS	0.24 TONS
20.51	LBS	0.34 TONS
1806.25	LBS	0.10 TONS
		0.01 TONS
		0.60
		52.83
		4.45

2. BABCOCK & WILCOX STEAM BOILERS (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	6.7125	6.1459	6.5521	5.9322	8.2069	7.5472	7.4550	5.2331	5.2765	7.5314	6.8410	6.2574
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	90.28	82.66	88.13	79.79	110.38	101.51	100.27	70.39	70.97	101.30	92.01	84.16
NOx	341.93	313.07	333.76	302.19	418.06	384.45	379.76	266.57	268.78	383.65	348.48	318.75
PM	51.02	46.71	49.80	45.08	62.37	57.36	56.66	39.77	40.10	57.24	51.99	47.56
SOx	4.03	3.69	3.93	3.56	4.92	4.53	4.47	3.14	3.17	4.52	4.10	3.75
CO	2080.88	1905.23	2031.15	1838.98	2644.14	2339.63	2311.04	1622.26	1635.72	2334.73	2120.72	1939.79

BABCOCK & WILCOX BOILERS		
EMISSION SUBTOTALS		EMISSION FACTORS
79.69	MMCF	GAS
0.00	MMCF	FUEL OIL
1071.85	LBS	LBS/MMCF
4059.47	LBS	LBS/MGAL
605.65	LBS	0.54 TONS
47.81	LBS	2.03 TONS
24704.27	LBS	0.30 TONS
		7.60
		2.00
		0.80
		24.41
		310.00
		43.92

REFERENCE: Annual Emission Limits and Emission Factors from Title V Permit
Attachment PO1267PC2

PERMITTED CONDITIONS (PER YEAR)
ROC 14.88 TONS
NOx 33.38 TONS
PM 8.73 TONS
SOx 25.01 TONS
CO 57.59 TONS

EMISSION TOTALS
ROC 1555.63 LBS 0.78 TONS
NOx 4742.14 LBS 2.37 TONS
PM 814.21 LBS 0.41 TONS
SOx 68.33 LBS 0.03 TONS
CO 26510.52 LBS 13.26 TONS

3. EMERGENCY GENERATOR OPERATING HOURS. (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Maintenance	0.00	0.20	0.00	0.20	0.00	0.00	0.20	0.00	0.00	0.30	0.00	0.40
Emergency	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.70	87.40	0.00	0.00	0.00

TOTAL HOURS
1.30 HOURS
88.10 HOURS

REFERENCE: Airborne Toxic Control Measure For Stationary Compression Engines.
Attachment ATCM In-Use Emergency Engines

PERMITTED LIMITS
Maintenance 20.00 HOURS
Emergency N/A HOURS

CI POWER COGENERATION PLANT ROLLING TWELVE-MONTH EMISSIONS CALCULATIONS

1. GE LM-2500-33 GAS TURBINE (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	0.00	12.66	1.31	0.00	0.00	2.80	1.77	0.00	0.00	2.01	1.92	0.86
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	0.00	179.21	18.52	0.00	0.00	39.59	25.05	0.00	0.00	28.46	27.15	12.14
NOx	0	273.5	20.65	0	0	58.91	37.41	0	0	40.17	27.16	14.18
PM	0.00	77.25	7.98	0.00	0.00	17.07	10.80	0.00	0.00	12.27	11.70	5.23
SOx	0.00	7.60	0.79	0.00	0.00	1.68	1.06	0.00	0.00	1.21	1.15	0.51
CO	0.00	669.08	69.13	0.00	0.00	147.83	93.54	0.00	0.00	106.27	101.37	45.33
NH3 Usage (MMCF)	0.000	17.347	1.931	0.000	0.000	3.888	2.331	0.000	0.000	3.312	2.362	1.049

EMISSION SUBTOTALS		EMISSION FACTORS	
		GAS	FUEL OIL
23.33	MMCF	14.15	1.84
0.00	MMCF	LBS/MMCF	LBS/MGAL
330.12	LBS	0.17	TONS
471.98	LBS	0.24	TONS
142.31	LBS	0.07	TONS
14.00	LBS	0.01	TONS
1232.54	LBS	0.62	TONS
		52.83	4.45

2. BABCOCK & WILCOX STEAM BOILERS (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	6.1459	6.5521	5.9322	8.2069	7.5472	7.4550	5.2331	5.2765	7.5314	6.8410	6.2574	5.8384
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	82.66	88.13	79.79	110.38	101.51	100.27	70.39	70.97	101.30	92.01	84.16	78.53
NOx	313.07	333.76	302.19	418.06	384.45	379.76	266.57	268.79	383.65	348.48	318.75	297.41
PM	46.71	49.80	45.08	62.37	57.36	56.66	39.77	40.10	57.24	51.99	47.56	44.37
SOx	3.69	3.93	3.56	4.92	4.53	4.47	3.14	3.17	4.52	4.10	3.78	3.50
CO	1905.23	2031.15	1838.98	2544.14	2339.63	2311.04	1622.26	1635.72	2334.73	2120.72	1939.79	1809.91

EMISSION SUBTOTALS		EMISSION FACTORS	
		GAS	FUEL OIL
78.82	MMCF	13.45	1.60
0.00	MMCF	LBS/MMCF	LBS/MGAL
1060.09	LBS	0.53	TONS
4014.94	LBS	2.01	TONS
599.01	LBS	0.30	TONS
47.29	LBS	0.02	TONS
2443.31	LBS	12.22	TONS
		310.00	43.92

PERMITTED CONDITIONS (PER YEAR)
ROC
NOx
PM
SOx
CO

14.88	TONS
33.38	TONS
8.73	TONS
25.01	TONS
57.59	TONS

EMISSION TOTALS			
1390.21	LBS	0.70	TONS
4486.92	LBS	2.24	TONS
741.32	LBS	0.37	TONS
61.29	LBS	0.03	TONS
25665.85	LBS	12.83	TONS

REFERENCE: Annual Emission Limits and Emission Factors from Title V Permit Attachment PO1267PC2

3. EMERGENCY GENERATOR OPERATING HOURS. (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Maintenance	0.20	0.00	0.20	0.00	0.00	0.20	0.00	0.00	0.30	0.00	0.40	0.00
Emergency	0.00	0.00	0.00	0.00	0.00	0.00	0.70	87.40	0.00	0.00	0.00	0.00

TOTAL HOURS
1.30 HOURS
88.10 HOURS

REFERENCE: Airborne Toxic Control Measure For Stationary Compression Engines. Attachment ATCM In-Use Emergency Engines

PERMITTED LIMITS	HOURS
Maintenance	20.00 HOURS
Emergency	N/A HOURS

**CI POWER COGENERATION PLANT
ROLLING TWELVE-MONTH EMISSIONS CALCULATIONS**

1. GE LM-2500-33 GAS TURBINE (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	12.66	1.31	0.00	0.00	2.80	1.77	0.00	0.00	2.01	1.92	0.86	3.31
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	179.21	18.52	0.00	0.00	39.59	25.05	0.00	0.00	28.46	27.15	12.14	46.90
NOx	273.5	20.65	0	0	58.91	37.41	0	0	40.17	27.16	14.18	67.68
PM	77.25	7.98	0.00	0.00	17.07	10.80	0.00	0.00	12.27	11.70	5.23	20.22
SOx	7.50	0.79	0.00	0.00	1.68	1.06	0.00	0.00	1.21	1.15	0.51	1.99
CO	669.08	69.13	0.00	0.00	147.83	93.54	0.00	0.00	106.27	101.37	45.33	175.12
NH3 Usage (MMCF)	17.347	1.931	0.000	0.000	3.888	2.331	0.000	0.000	3.312	2.362	1.049	4.169

GE LM-2500-33 GAS TURBINE		
EMISSION SUBTOTALS		EMISSION FACTORS
26.65	MMCF	
0.00	MMCF	
377.03	LBS	0.19 TONS
539.66	LBS	0.27 TONS
162.53	LBS	0.08 TONS
15.99	LBS	0.01 TONS
1407.66	LBS	0.70 TONS
		14.15
		1.84
		6.10
		3.10
		0.60
		24.41
		52.83
		4.45

2. BABCOCK & WILCOX STEAM BOILERS (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	6.5521	5.9322	8.2069	7.5472	7.4550	5.2331	5.2765	7.5314	6.8410	6.2574	5.8384	5.6760
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	88.13	79.79	110.38	101.51	100.27	70.39	70.97	101.30	92.01	84.16	78.53	76.34
NOx	333.76	302.19	418.06	384.45	379.76	266.57	268.79	383.65	348.48	318.75	297.41	288.13
PM	49.80	45.08	62.37	57.36	56.66	39.77	40.10	57.24	51.99	47.56	44.37	43.14
SOx	3.93	3.56	4.92	4.53	4.47	3.14	3.17	4.52	4.10	3.75	3.50	3.41
CO	2031.15	1838.98	2544.14	2339.63	2311.04	1622.26	1635.72	2334.73	2120.72	1939.79	1809.91	1759.55

BABCOCK & WILCOX BOILERS		
EMISSION SUBTOTALS		EMISSION FACTORS
78.35	MMCF	
0.00	MMCF	
1053.77	LBS	0.53 TONS
3991.01	LBS	2.00 TONS
595.44	LBS	0.30 TONS
47.01	LBS	0.02 TONS
24287.63	LBS	12.14 TONS
		13.45
		1.60
		50.94
		20.74
		7.60
		2.00
		0.60
		24.41
		310.00
		43.92

PERMITTED CONDITIONS (PER YEAR)
ROC
NOx
PM
SOx
CO

EMISSION TOTALS
ROC
NOx
PM
SOx
CO

3. EMERGENCY GENERATOR OPERATING HOURS. (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Maintenance	0.00	0.20	0.00	0.00	0.20	0.00	0.00	0.30	0.00	0.40	0.00	0.20
Emergency	0.00	0.00	0.00	0.00	0.00	0.70	87.40	0.00	0.00	0.00	0.00	0.00

TOTAL HOURS
1.30 HOURS
88.10 HOURS

REFERENCE: Airborne Toxic Control Measure For Stationary Compression Engines.
Attachment ATCM In-Use Emergency Engines

PERMITTED LIMITS	
Maintenance	20.00 HOURS
Emergency	N/A HOURS

**CI POWER COGENERATION PLANT
ROLLING TWELVE-MONTH EMISSIONS CALCULATIONS**

1. GE LM-2500-33 GAS TURBINE (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	1.31	0.00	0.00	2.80	1.77	0.00	0.00	2.01	1.92	0.86	3.31	2.57
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	18.52	0.00	0.00	39.59	25.05	0.00	0.00	28.46	27.15	12.14	46.90	36.42
NOx	20.65	0	0	58.91	37.41	0	0	40.17	27.16	14.18	67.68	49.74
PM	7.98	0.00	0.00	17.07	10.80	0.00	0.00	12.27	11.70	5.23	20.22	15.70
SOx	0.79	0.00	0.00	1.68	1.06	0.00	0.00	1.21	1.15	0.51	1.99	1.54
CO	69.13	0.00	0.00	147.83	93.54	0.00	0.00	106.27	101.37	45.33	175.12	135.66
NH ₃ Usage (MMCF)	1.931	0.000	0.000	3.888	2.331	0.000	0.000	3.312	2.362	1.049	4.169	3.967

EMISSION SUBTOTALS		EMISSION FACTORS	
16.55	MMCF	GAS	FUEL OIL
0.00	MMCF	LBS/MMCF	LBS/MGAL
234.24	LBS	0.12	TONS
315.90	LBS	0.16	TONS
100.98	LBS	0.05	TONS
9.93	LBS	0.00	TONS
874.55	LBS	0.44	TONS

2. BABCOCK & WILCOX STEAM BOILERS (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	5.9322	8.2069	7.5472	7.4550	5.2331	5.2765	7.5314	6.8410	6.2574	5.8384	5.6760	6.4866
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	79.79	110.38	101.51	100.27	70.39	70.97	101.30	92.01	84.16	78.53	76.34	87.24
NOx	302.19	418.06	384.45	379.76	266.57	268.79	383.65	348.48	318.75	297.41	289.13	330.43
PM	45.08	62.37	57.36	56.66	39.77	40.10	57.24	51.99	47.56	44.37	43.14	49.30
SOx	3.56	4.92	4.53	4.47	3.14	3.17	4.52	4.10	3.75	3.50	3.41	3.89
CO	1838.98	2544.14	2339.63	2311.04	1622.26	1635.72	2334.73	2120.72	1939.79	1809.91	1759.55	2010.83

EMISSION SUBTOTALS		EMISSION FACTORS	
78.28	MMCF	GAS	FUEL OIL
0.00	MMCF	LBS/MMCF	LBS/MGAL
1052.89	LBS	0.53	TONS
3987.67	LBS	1.99	TONS
594.94	LBS	0.30	TONS
46.97	LBS	0.02	TONS
24267.31	LBS	12.13	TONS

REFERENCE: Annual Emission Limits and Emission Factors from Title V Permit
Attachment PO1267PC2

PERMITTED CONDITIONS (PER YEAR)
ROC
NOx
PM
SOx
CO

EMISSION TOTALS
ROC
NOx
PM
SOx
CO

3. EMERGENCY GENERATOR OPERATING HOURS. (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Maintenance	0.20	0.00	0.00	0.20	0.00	0.00	0.30	0.00	0.40	0.00	0.20	0.10
Emergency	0.00	0.00	0.00	0.00	0.70	87.40	0.00	0.00	0.00	0.00	0.00	0.00

TOTAL HOURS
1.40 HOURS
88.10 HOURS

REFERENCE: Airborne Toxic Control Measure For Stationary Compression Engines.
Attachment ATCM In-Use Emergency Engines

PERMITTED LIMITS
Maintenance
Emergency

**CI POWER COGENERATION PLANT
ROLLING TWELVE-MONTH EMISSIONS CALCULATIONS**

1. GE LM-2500-33 GAS TURBINE (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	0.00	0.00	2.80	1.77	0.00	0.00	2.01	1.92	0.86	3.37	2.57	5.68
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	0.00	0.00	39.59	25.05	0.00	0.00	28.46	27.15	12.14	46.90	36.42	80.43
NOx	0	0	58.91	37.41	0	0	40.17	27.16	14.18	67.68	49.74	103.75
PM	0.00	0.00	17.07	10.80	0.00	0.00	12.27	11.70	5.23	20.22	15.70	34.67
SOx	0.00	0.00	1.68	1.06	0.00	0.00	1.21	1.15	0.51	1.99	1.54	3.41
CO	0.00	0.00	147.83	93.54	0.00	0.00	106.27	101.37	45.33	175.12	136.96	300.30
NH3 Usage (MMCF)	0.000	0.000	3.888	2.331	0.000	0.000	3.312	2.362	1.049	4.169	3.967	6.993

GE LM-2500-33 GAS TURBINE		EMISSION FACTORS	
EMISSION SUBTOTALS		EMISSION FACTORS	
		GAS	FUEL OIL
20.93	MMCF		
0.00	MMCF		
296.15	LBS	0.15 TONS	14.15
399.00	LBS	0.20 TONS	1.84
127.67	LBS	0.06 TONS	3.10
12.56	LBS	0.01 TONS	24.41
1105.71	LBS	0.55 TONS	4.45

2. BABCOCK & WILCOX STEAM BOILERS (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	8.2069	7.5472	7.4550	5.2331	5.2765	7.5314	6.8410	6.2574	5.8384	5.6760	6.4866	6.4946
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	110.38	101.51	100.27	70.39	70.97	101.30	92.01	84.16	78.53	76.34	87.24	87.35
NOx	418.06	384.45	379.76	266.57	268.79	383.65	348.48	318.75	297.41	289.13	330.43	330.84
PM	62.37	57.36	56.66	39.77	40.10	57.24	51.99	47.56	44.37	43.14	49.30	49.36
SOx	4.92	4.53	4.47	3.14	3.17	4.52	4.10	3.75	3.50	3.41	3.89	3.90
CO	2544.14	2339.63	2311.04	1622.26	1635.72	2334.73	2120.72	1939.79	1809.91	1759.55	2010.83	2013.33

BABCOCK & WILCOX BOILERS		EMISSION FACTORS	
EMISSION SUBTOTALS		EMISSION FACTORS	
		GAS	FUEL OIL
78.84	MMCF		
0.00	MMCF		
1060.45	LBS	0.53 TONS	13.45
4016.32	LBS	2.01 TONS	50.94
599.21	LBS	0.30 TONS	7.60
47.31	LBS	0.02 TONS	24.41
24441.66	LBS	12.22 TONS	310.00

REFERENCE: Annual Emission Limits and Emission Factors from Title V Permit
Attachment PO1267PC2

PERMITTED CONDITIONS (PER YEAR)	ROC	NOx	PM	SOx	CO
	14.88 TONS	33.38 TONS	8.73 TONS	25.01 TONS	57.69 TONS

EMISSION TOTALS		ROC	NOx	PM	SOx	CO
		1356.61 LBS	4415.32 LBS	726.89 LBS	59.86 LBS	2547.37 LBS
		0.68 TONS	2.21 TONS	0.36 TONS	0.03 TONS	12.77 TONS

3. EMERGENCY GENERATOR OPERATING HOURS. (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Maintenance	0.00	0.00	0.20	0.00	0.00	0.30	0.00	0.40	0.00	0.20	0.10	0.20
Emergency	0.00	0.00	0.00	0.70	87.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00

TOTAL HOURS	
	1.40 HOURS
	88.10 HOURS

REFERENCE: Airborne Toxic Control Measure For Stationary Compression Engines.
Attachment ATCM In-Use Emergency Engines.

PERMITTED LIMITS	MAINTENANCE HOURS	EMERGENCY HOURS
	20.00	N/A

**CI POWER COGENERATION PLANT
ROLLING TWELVE-MONTH EMISSIONS CALCULATIONS**

1. GE LM-2500-33 GAS TURBINE (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	0.00	2.80	1.77	0.00	0.00	2.01	1.92	0.86	3.31	2.57	5.68	0.00
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	0.00	39.59	25.05	0.00	0.00	28.46	27.15	12.14	48.90	36.42	80.43	0.00
NOx	0	58.91	37.41	0	0	40.17	27.16	14.18	67.68	49.74	103.75	0
PM	0.00	17.07	10.80	0.00	0.00	12.27	11.70	5.23	20.22	15.70	34.67	0.00
SOx	0.00	1.68	1.06	0.00	0.00	1.21	1.15	0.51	1.99	1.54	3.41	0.00
CO	0.00	147.83	93.54	0.00	0.00	106.27	101.37	45.33	175.12	135.96	300.30	0.00
NH3 Usage (MMCF)	0.000	3.888	2.331	0.000	0.000	3.312	2.362	1.049	4.169	3.967	6.993	0.000

GE LM-2500-33 GAS TURBINE		EMISSION FACTORS	
EMISSION SUBTOTALS		GAS	FUEL OIL
		LBS/MMCF	LBS/MGAL
20.93	MMCF		
0.00	MMCF		
296.15	LBS	0.15 TONS	14.15
399.00	LBS	0.20 TONS	1.84
127.67	LBS	0.06 TONS	6.10
12.56	LBS	0.01 TONS	0.60
1105.71	LBS	0.55 TONS	52.83

2. BABCOCK & WILCOX STEAM BOILERS (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	7.5472	7.4550	5.2331	5.2765	7.5314	6.8410	6.2574	5.8384	5.6760	6.4866	6.4946	7.7185
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	101.51	100.27	70.39	70.97	101.30	92.01	84.16	78.53	76.34	87.24	87.35	103.79
NOx	384.45	379.76	266.57	268.79	383.65	348.46	318.75	297.41	289.13	330.43	330.84	393.08
PM	57.36	56.66	39.77	40.10	57.24	51.99	47.56	44.37	43.14	49.30	49.36	58.66
SOx	4.53	4.47	3.14	3.17	4.52	4.10	3.75	3.50	3.41	3.89	3.90	4.63
CO	2339.63	2311.04	1622.26	1635.72	2334.73	2120.72	1939.79	1809.91	1759.55	2010.83	2013.33	2392.11

BABCOCK & WILCOX BOILERS		EMISSION FACTORS	
EMISSION SUBTOTALS		GAS	FUEL OIL
		LBS/MMCF	LBS/MGAL
78.35	MMCF		
0.00	MMCF		
1053.86	LBS	0.53 TONS	13.45
3991.34	LBS	2.00 TONS	50.94
595.49	LBS	0.30 TONS	7.60
47.01	LBS	0.02 TONS	0.60
24289.64	LBS	12.14 TONS	310.00

PERMITTED CONDITIONS (PER YEAR)
ROC
NOx
PM
SOx
CO

EMISSION TOTALS
ROC
NOx
PM
SOx
CO

REFERENCE: Annual Emission Limits and Emission Factors from Title V Permit Attachment PO1267PC2

ROC	14.88 TONS
NOx	33.38 TONS
PM	8.73 TONS
SOx	25.01 TONS
CO	57.59 TONS

ROC	1350.01 LBS	0.68 TONS
NOx	4390.34 LBS	2.20 TONS
PM	723.16 LBS	0.36 TONS
SOx	59.57 LBS	0.03 TONS
CO	25395.35 LBS	12.70 TONS

3. EMERGENCY GENERATOR OPERATING HOURS. (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Maintenance	0.00	0.20	0.00	0.00	0.30	0.00	0.40	0.00	0.20	0.10	0.20	0.40
Emergency	0.00	0.00	0.70	87.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

TOTAL HOURS
1.80 HOURS
88.10 HOURS

REFERENCE: Airborne Toxic Control Measure For Stationary Compression Engines. Attachment ATCM In-Use Emergency Engines

PERMITTED LIMITS	
Maintenance	20.00 HOURS
Emergency	N/A HOURS

**CI POWER COGENERATION PLANT
ROLLING TWELVE-MONTH EMISSIONS CALCULATIONS**

1. GE LM-2500-33 GAS TURBINE (Permit to Operate #1267)

Month	GE LM-2500-33 GAS TURBINE											
	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	2.80	1.77	0.00	0.00	2.01	1.92	0.96	3.31	2.57	5.68	0.00	0.00
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	39.59	25.05	0.00	0.00	28.46	27.15	12.14	46.90	36.42	80.43	0.00	0.00
NOx	58.91	37.41	0	0	40.17	27.16	14.18	67.68	49.74	103.75	0	0
PM	17.07	10.80	0.00	0.00	12.27	11.70	5.23	20.22	15.70	34.67	0.00	0.00
SOx	1.68	1.06	0.00	0.00	1.21	1.15	0.51	1.99	1.54	3.41	0.00	0.00
CO	147.83	93.54	0.00	0.00	106.27	101.37	45.33	175.12	135.96	300.30	0.00	0.00
NH3 Usage (MMCF)	3.888	2.331	0.000	0.000	3.312	2.362	1.049	4.169	3.967	6.993	0.000	0.000

EMISSION SUBTOTALS		EMISSION FACTORS	
		GAS	FUEL OIL
20.93	MMCF	LBS/MMCF	LBS/MGAL
0.00	MMCF	14.15	1.84
296.15	LBS	0.20	TONS
399.00	LBS	0.06	TONS
127.67	LBS	0.01	TONS
12.56	LBS	0.55	TONS
1105.71	LBS	52.83	4.45

2. BABCOCK & WILCOX STEAM BOILERS (Permit to Operate #1267)

Month	BABCOCK & WILCOX BOILERS											
	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	7.4550	5.2331	5.2765	7.5314	6.8410	6.2574	5.8384	5.6760	6.4866	6.4946	7.7165	8.6376
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	100.27	70.39	70.97	101.30	92.01	84.16	78.53	76.34	87.24	87.35	103.79	116.17
NOx	379.76	266.57	268.79	383.65	348.48	318.75	297.41	289.13	330.43	330.84	383.08	439.99
PM	56.66	39.77	40.10	57.24	51.99	47.56	44.37	43.14	49.30	49.36	58.65	65.65
SOx	4.47	3.14	3.17	4.52	4.10	3.75	3.50	3.41	3.89	3.90	4.63	5.18
CO	2311.04	1622.26	1635.72	2334.73	2120.72	1939.79	1809.91	1759.55	2010.83	2013.33	2392.11	2677.63

EMISSION SUBTOTALS		EMISSION FACTORS	
		GAS	FUEL OIL
79.44	MMCF	LBS/MMCF	LBS/MGAL
0.00	MMCF	13.45	1.60
1068.52	LBS	2.02	TONS
4046.88	LBS	50.94	20.74
603.77	LBS	7.60	2.00
47.67	LBS	0.02	TONS
24627.63	LBS	310.00	43.92

REFERENCE: Annual Emission Limits and Emission Factors from Title V Permit
Attachment PO1267PC2

PERMITTED CONDITIONS (PER YEAR)	ROC	NOx	PM	SOx	CO
	14.88 TONS	33.38 TONS	8.73 TONS	25.01 TONS	57.59 TONS

PERMITTED LIMITS	ROC	NOx	PM	SOx	CO
	1364.68 LBS	4445.88 LBS	731.44 LBS	60.22 LBS	25733.34 LBS

3. EMERGENCY GENERATOR OPERATING HOURS. (Permit to Operate #1267)

Month	TOTAL HOURS											
	1	2	3	4	5	6	7	8	9	10	11	12
Maintenance	0.20	0.00	0.00	0.30	0.00	0.40	0.00	0.20	0.10	0.20	0.40	0.00
Emergency	0.00	0.70	87.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

PERMITTED LIMITS	MAINTENANCE HOURS	EMERGENCY HOURS
	20.00 HOURS	N/A HOURS

REFERENCE: Airborne Toxic Control Measure For Stationary Compression Engines.
Attachment ATCM In-Use Emergency Engines

**CI POWER COGENERATION PLANT
ROLLING TWELVE-MONTH EMISSIONS CALCULATIONS**

1. GE LM-2500-33 GAS TURBINE (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	1.77	0.00	0.00	2.01	1.92	0.86	3.31	2.57	5.68	0.00	0.00	0.00
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	25.05	0.00	0.00	28.46	27.15	12.14	46.90	36.42	80.43	0.00	0.00	0.00
NOx	37.41	0	0	40.17	27.16	14.18	67.68	49.74	103.75	0	0	0
PM	10.80	0.00	0.00	12.27	11.70	5.23	20.22	15.70	34.67	0.00	0.00	0.00
SOx	1.06	0.00	0.00	1.21	1.15	0.51	1.99	1.54	3.41	0.00	0.00	0.00
CO	93.54	0.00	0.00	106.27	101.37	45.33	175.12	135.96	300.30	0.00	0.00	0.00
NH3 Usage (MMCF)	2.331	0.000	0.000	3.312	2.362	1.049	4.169	3.967	6.993	0.000	0.000	0.000

GE LM-2500-33 GAS TURBINE		
EMISSION SUBTOTALS		EMISSION FACTORS
18.13	MMCF	GAS
0.00	MMCF	FUEL OIL
256.56	LBS	LBS/MMCF
340.09	LBS	LBS/MGAL
110.60	LBS	CEM
10.88	LBS	CEM
957.88	LBS	CEM
		0.60
		52.83
		4.45

2. BABCOCK & WILCOX STEAM BOILERS (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	5.2331	5.2765	7.5314	6.8410	6.2574	5.8384	5.6760	6.4866	6.4946	7.7166	8.6375	7.941567
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	70.39	70.97	101.30	92.01	84.16	78.53	76.34	87.24	87.35	103.79	116.17	106.81
NOx	266.57	268.79	383.65	348.48	318.75	297.41	289.13	330.43	330.84	393.08	439.99	404.54
PM	39.77	40.10	57.24	51.99	47.66	44.37	43.14	49.30	49.36	58.65	65.65	60.36
SOx	3.14	3.17	4.52	4.10	3.75	3.50	3.41	3.89	3.90	4.63	5.18	4.76
CO	1622.26	1635.72	2334.73	2120.72	1939.79	1809.91	1759.56	2010.83	2013.33	2392.11	2677.63	2461.89

BABCOCK & WILCOX BOILERS		
EMISSION SUBTOTALS		EMISSION FACTORS
79.93	MMCF	GAS
0.00	MMCF	FUEL OIL
1075.07	LBS	LBS/MMCF
4071.66	LBS	LBS/MGAL
607.47	LBS	CEM
47.96	LBS	CEM
24778.47	LBS	CEM
		0.50
		310.00
		43.92

REFERENCE: Annual Emission Limits and Emission Factors from Title V Permit Attachment PO1267PC2

PERMITTED CONDITIONS (PER YEAR)
ROC
NOx
PM
SOx
CO

EMISSION TOTALS
ROC
NOx
PM
SOx
CO

3. EMERGENCY GENERATOR OPERATING HOURS. (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Maintenance	0.00	0.00	0.30	0.00	0.40	0.00	0.20	0.10	0.20	0.40	0.00	0.30
Emergency	0.70	87.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

TOTAL HOURS
1.90 HOURS
88.10 HOURS

REFERENCE: Airborne Toxic Control Measure For Stationary Compression Engines. Attachment ATCM In-Use Emergency Engines.

PERMITTED LIMITS
Maintenance
Emergency

PERMITTED LIMITS
20.00 HOURS
N/A HOURS

**CI POWER COGENERATION PLANT
ROLLING TWELVE-MONTH EMISSIONS CALCULATIONS**

1. GE LM-2500-33 GAS TURBINE (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	0.00	0.00	2.01	1.92	0.86	3.31	2.57	5.68	0.00	0.00	0.00	0.00
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	0.00	0.00	28.46	27.15	12.14	46.90	36.42	80.43	0.00	0.00	0.00	0.00
NOx	0	0	40.17	27.16	14.18	67.68	49.74	103.75	0	0	0	0
PM	0.00	0.00	12.27	11.70	5.23	20.22	15.70	34.67	0.00	0.00	0.00	0.00
SOx	0.00	0.00	1.21	1.15	0.51	1.99	1.54	3.41	0.00	0.00	0.00	0.00
CO	0.00	0.00	106.27	101.37	45.33	175.12	135.96	300.30	0.00	0.00	0.00	0.00
NH3 Usage (MMCF)	0.000	0.000	3.312	2.362	1.049	4.169	3.967	6.993	0.000	0.000	0.000	0.000

EMISSION SUBTOTALS		EMISSION FACTORS	
16.36	MMCF	GAS	FUEL OIL
231.51	LBS	LBS/MMCF	LBS/MGAL
302.68	LBS	0.12 TONS	14.15
99.80	LBS	0.15 TONS	6.10
9.82	LBS	0.05 TONS	3.10
864.35	LBS	0.00 TONS	0.60
		0.43 TONS	52.83
			4.45

2. BABCOCK & WILCOX STEAM BOILERS (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Fuel Gas (MMCF)	5.277	7.531	6.841	6.257	5.838	5.676	6.487	6.455	7.716	8.638	7.942	8.756
Fuel Oil (Mgal)	0	0	0	0	0	0	0	0	0	0	0	0
ROC	70.97	101.30	92.01	84.16	78.53	76.34	87.24	87.35	103.79	116.17	106.81	117.77
NOx	288.79	383.65	346.48	318.75	297.41	299.13	330.43	330.84	393.08	439.99	404.54	446.03
PM	40.10	57.24	51.99	47.56	44.37	43.14	49.30	49.36	58.65	65.65	60.36	66.55
SOx	3.17	4.52	4.10	3.75	3.50	3.41	3.89	3.90	4.63	5.18	4.76	5.25
CO	1695.72	2334.73	2120.72	1939.79	1809.91	1759.55	2010.83	2013.33	2392.11	2677.63	2461.89	2714.36

EMISSION SUBTOTALS		EMISSION FACTORS	
83.45	MMCF	GAS	FUEL OIL
0.00	MMCF	LBS/MMCF	LBS/MGAL
1122.45	LBS	0.56 TONS	13.45
4251.12	LBS	2.13 TONS	50.94
634.25	LBS	0.32 TONS	7.60
50.07	LBS	0.03 TONS	0.60
25870.57	LBS	12.94 TONS	310.00
			43.92

PERMITTED CONDITIONS (PER YEAR)
ROC
NOx
PM
SOx
CO

14.88 TONS
33.38 TONS
8.73 TONS
25.01 TONS
57.59 TONS

EMISSION TOTALS
1353.96 LBS
4553.80 LBS
734.05 LBS
59.89 LBS
26734.92 LBS

REFERENCE: Annual Emission Limits and Emission Factors from Title V Permit Attachment PO1267PC2

3. EMERGENCY GENERATOR OPERATING HOURS. (Permit to Operate #1267)

Month	1	2	3	4	5	6	7	8	9	10	11	12
Maintenance	0.00	0.30	0.00	0.40	0.00	0.20	0.10	0.20	0.40	0.00	0.30	0.00
Emergency	87.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

TOTAL HOURS
1.90 HOURS
87.40 HOURS

REFERENCE: Airborne Toxic Control Measure For Stationary Compression Engines. Attachment ATCM In-Use Emergency Engines

PERMITTED LIMITS:	
Maintenance	20.00 HOURS
Emergency	N/A HOURS

Material Name	Material ID	Manufacturer	Date of MSDS	Size [oz]	Quantity Used	ROC Content [lb/gal]	ROC [lb]	
Aerosol Penetrating Oil		Kano Labs	3/30/2001	10	0	5.01	0.00	
Aerosol Surface Cleaner	M715	Gunk	1/12/2006	14	12	3.67	4.82	
Aerosol Surface Cleaner	ICA736	I-Chem	1/13/2006	14	0	5.21	0.00	
Aerosol paint remover	7764T21	Diversified Brands	9/20/2016	15	0	2.31	0.00	
Annual Total ROC [lb]							4.82	
Rule 23 ROC limit [lb]							200	

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Solvent Cleaning – Material List

Solvent Name	Manufacturer's Description	ROC Content	ROC Partial Pressure	Intended Use	ROC Limit *
Aerosol Paint Remover	Diversified Brands #7764T21	277 g/l	Unknown	Maintenance cleaning	Exempt
Aerosol Penetrating Oil	Kano Labs	60% by volume	Unknown	Rust Penetrator	Exempt
Aerosol Surface Cleaner	Gunk M715	44% by volume	Unknown	Maintenance cleaning	Exempt
Aerosol Surface Cleaner	I-Chem ICA736	43.52% by volume	Unknown	Maintenance cleaning	Exempt

* Notes:

- 1) ROC content limit is 900 grams per liter and ROC composite partial pressure limit is 20 mmHg at 20°C for repair and maintenance cleaning.
- 2) ROC limit is 950 grams per liter and ROC composite partial pressure limit is 35 mmHg at 35°C for cleanup including cleaning of application equipment.
- 3) ROC limit is 70 grams per liter for manufacturing or surface preparation.
- 4) The use of up to 160 Fl. Oz. of non-refillable aerosol cleaning products per day per facility is exempt.

Attachment Rule 74.2
Usage Log for Architectural Coatings and Thinners

Material Name	Material ID	Manufacturer	Date of SDS	Size [oz]	Quantity Used	ROC Content [g/l]	Usage	Exemption or ROC Limit [g/l]	ROC Content as Applied [lb/gal]	ROC [lb]
Rust Inhibitor	RF-129	Kylon	7/21/2009	10.25	0	391	Rust preventative coating	400	3.26	0.00
High temp. aerosol paint (Aluminum)	Z630	Zynolyte / Aerove	3/11/2008	11	12	644	Aerosol coating	Rule 74.2 F.2	5.37	5.54
Galvanizing Compound (aerosol)	7007	Crown / Aerove	11/30/2010	13	0	295	Aerosol coating	Rule 74.2 F.2	2.46	0.00
Aerosol paint (Black)	Z635	Zynolyte / Aerove	3/11/2008	11	0	644	Aerosol coating	Rule 74.2 F.2	5.37	0.00
Aerosol paint (Red Primer)	V2169838	Rustoleum	12/13/2016	15	0	760	Rust preventative coating	Rule 74.2 F.2	6.34	0.00
Syn-Lustro Gunmetal Gray	10-12-1	Dunn-Edwards	4/22/2015	32	0	390	Rust Preventative Alkyd Enamel Coating	250	3.25	0.00
Syn-Lustro tawny yellow	10-M	Dunn-Edwards	4/22/2015	32	0	390	Rust Preventative Alkyd Enamel Coating	250	3.25	0.00
Syn-Lustro Meadow Irish Green	10-27	Dunn-Edwards	4/22/2015	32	0	390	Rust Preventative Alkyd Enamel Coating	250	3.25	0.00
Syn-Lustro Safety Green	10V-11-1	Dunn-Edwards	4/22/2015	32	0	390	Rust Preventative Alkyd Enamel Coating	250	3.25	0.00
Syn-Lustro Fire Red	10-19	Dunn-Edwards	4/22/2015	32	0	390	Rust Preventative Alkyd Enamel Coating	250	3.25	0.00
Syn-Lustro Machinery Green	10-24	Dunn-Edwards	4/22/2015	32	0	390	Rust Preventative Alkyd Enamel Coating	250	3.25	0.00
Syn-Lustro HI Vis Yellow	40465	Dunn-Edwards	4/22/2015	32	0	390	Rust Preventative Alkyd Enamel Coating	250	3.25	0.00
EPO Coat H3H	H3H	Dynamis	4/7/2000	128	0	321	Masonry Sealer	400	2.68	0.00
Navajo White	W7051	Dunn-Edwards	4/1/1999	128	1	140	Industrial Maintenance Coating	250	1.17	1.17
Paint Thinner		Sunnyside	4/29/2009	128	0	780	Thinner	N/A	6.51	0.00
									Annual total ROC [lb]	7
									Rule 23 ROC limit [lb]	200



December 3, 2020

Ed Swede
Environmental Engineer, Compliance Section
Ventura County Air Pollution Control District
669 County Square Drive
Ventura, CA 93003

Re: Projected Shutdown Schedule for CY 2020

Mr. Swede,

In compliance with Title V Attachment PO1267PC2 Section 9, the proposed shutdown schedule for CY 2020 is submitted as detailed in Attachment 1.

The facility currently operates under a Dispatch Power Purchase Agreement and the default state of the plant is shutdown unless dispatched by Southern California Edison.

The proposed schedule is for planning purposes only and is subject to change due to maintenance and operational requirements of the facility.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ysabel Trinidad'.

Ysabel Trinidad
Vice President

Attachments:

Attachment 1 – CI Power Cogeneration Plant Projected Shutdown Schedule for CY 2020



November 05, 2019

Memorandum to File

Re: Annual Gas Turbine and Standby boiler Opacity Survey

1. On November 04, 2019 CI Power Cogeneration Plant received an eight hour dispatch from 1400 to 2200. Over the course of this run the HRSG exhaust stack was inspected for visible emissions. There were no visible emissions observed at the HRSG exhaust stack. Additionally, a review of the periodic Opacity Checks showed no visible emissions present at any of the times the unit was checked.
2. On November 05, 2019, a review of the periodic Opacity Checks for the Standby Boilers was conducted. The review showed that there were no visible emissions present at any of the times the units were checked.

A handwritten signature in black ink, appearing to read 'Jeffery M. Smith', written over a horizontal line.

Jeffery M. Smith
Plant Manager
CI Power

Solvent Cleaning – Material List

Solvent Name	Manufacturer's Description	ROC Content	ROC Partial Pressure	Intended Use	ROC Limit *
Aerosol Paint Remover	Diversified Brands #7764T21	277 g/l	Unknown	Maintenance cleaning	Exempt
Aerosol Penetrating Oil	Kano Labs	60% by volume	Unknown	Rust Penetrator	Exempt
Aerosol Surface Cleaner	Gunk M715	44% by volume	Unknown	Maintenance cleaning	Exempt
Aerosol Surface Cleaner	I-Chem ICA736	43.52% by volume	Unknown	Maintenance cleaning	Exempt

* Notes:

- 1) ROC content limit is 900 grams per liter and ROC composite partial pressure limit is 20 mmHg at 20°C for repair and maintenance cleaning.
- 2) ROC limit is 950 grams per liter and ROC composite partial pressure limit is 35 mmHg at 35°C for cleanup including cleaning of application equipment.
- 3) ROC limit is 70 grams per liter for manufacturing or surface preparation.
- 4) The use of up to 160 Fl. Oz. of non-refillable aerosol cleaning products per day per facility is exempt.

Attachment Rule 74.2
Usage Log for Architectural Coatings and Thinners

Material Name	Material ID	Manufacturer	Date of SDS	Size [oz]	Quantity Used	ROC Content [g/l]	Usage	Exemption or ROC Limit [g/l]	ROC Content as Applied [lb/gal]	ROC [lb]
Rust Inhibitor	RF-129	Kylon	7/21/2009	10.25	0	391	Rust preventative coating	400	3.26	0.00
High temp. aerosol paint (Aluminum)	Z630	Zynolyte / Aerove	3/11/2008	11	12	644	Aerosol coating	Rule 74.2 F.2	5.37	5.54
Galvanizing Compound (aerosol)	7007	Crown / Aerove	11/30/2010	13	0	295	Aerosol coating	Rule 74.2 F.2	2.46	0.00
Aerosol paint (Black)	Z635	Zynolyte / Aerove	3/11/2008	11	0	644	Aerosol coating	Rule 74.2 F.2	5.37	0.00
Aerosol paint (Red Primer)	V2169838	Rustoleum	12/13/2016	15	0	760	Rust preventative coating	Rule 74.2 F.2	6.34	0.00
Syn-Lustro Gunmetal Gray	10-12-1	Dunn-Edwards	4/22/2015	32	0	390	Rust Preventative Alkyd Enamel Coating	250	3.25	0.00
Syn-Lustro tawny yellow	10-M	Dunn-Edwards	4/22/2015	32	0	390	Rust Preventative Alkyd Enamel Coating	250	3.25	0.00
Syn-Lustro Meadow Irish Green	10-27	Dunn-Edwards	4/22/2015	32	0	390	Rust Preventative Alkyd Enamel Coating	250	3.25	0.00
Syn-Lustro Safety Green	10V-11-1	Dunn-Edwards	4/22/2015	32	0	390	Rust Preventative Alkyd Enamel Coating	250	3.25	0.00
Syn-Lustro Fire Red	10-19	Dunn-Edwards	4/22/2015	32	0	390	Rust Preventative Alkyd Enamel Coating	250	3.25	0.00
Syn-Lustro Machinery Green	10-24	Dunn-Edwards	4/22/2015	32	0	390	Rust Preventative Alkyd Enamel Coating	250	3.25	0.00
Syn-Lustro Hi Vis Yellow	40465	Dunn-Edwards	4/22/2015	32	0	390	Rust Preventative Alkyd Enamel Coating	250	3.25	0.00
EPO Coat H3H	H3H	Dynamis	4/7/2000	128	0	321	Masonry Sealer	400	2.68	0.00
Navajo White	W7051	Dunn-Edwards	4/1/1999	128	1	140	Industrial Maintenance Coating	250	1.17	1.17
Paint Thinner		Sunnyside	4/29/2009	128	0	780	Thinner	N/A	6.51	0.00
								Annual total ROC [lb]	7	
								Rule 23 ROC limit [lb]	200	

