2020 Reporting Year

Annual Title V Compliance Certification

For

The Procter & Gamble Paper Products Company
Oxnard, CA Facility

VCAPCD Permit No. 00015

Contact: Cindy Stines
Site Environmental Leader
805-485-8871 x2408
Stines.cg@pg.com

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION SIGNATURE COVER FORM

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

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

Confidentiality

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

Certification by Responsible Official

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

Signature and Title of Responsible Official:	Date:
Title: Plant Manager	2/10/2021

Time Period Covered by Compliance Certification

01 / 01 / 20 (MM/DD/YY) to 12 / 31 / 20 (MM/DD/YY)

Ventura County
Air Pollution
Control District

RESPONSIBLE OFFICIAL'S CERTIFICATION FORM

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

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

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

Certification by Responsible Official

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

Signature and Title of Responsible Official:	Date:
Signature: Mark B	2/10/2021
Title: Plant Manager	

Permit Section: 1

T.O.C
Permit Revisions Table
Permit Summary and Statement of Basis

This section contains a descriptive summary and statement of basis.

Compliance Certification is not applicable to this summary information

Permit Section: 2

Permitted Equipment and Applicable Requirements Table

This is a summary of requirements.

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

Compliance Certification is not applicable to this summary information.

Permit Section: 3

Permitted Throughput and Consumption Limit Table

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

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

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

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

Permit Section: 4

Permitted Emissions Table

This is a summary of requirements.

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

Compliance Certification is not applicable to this summary information.

Permit Section: 5

Exempt Equipment List (Insignificant Activities Table)

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

Permit Section: 6

Specific Applicable Requirements (Attachments)

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

A. Attachment # or Permit Condition #: Section 6 - 74.15 N.1	D. Frequency of monitoring: **Biennial**
B. Description: Boilers, Heater Treaters, Steam Generators, and Process Heaters Condition 1 – Emissions: NOx < 40 ppmvd, CO < 400 ppmvd Condition 2 – Source Tested every 24 months using ARB Method 100 Condition 3.a-b - Alternate Fuel Use limitations Condition 4 – Startup emissions exemption Condition 5 – Recordkeeping: Alternate Fuels, Biennial Source test report Condition 6 – Flue Gas Recirculation requirements per Section 7	E. Source test reference method: **Source Test Summary Form 1 of 4** **ARB Method 100:** **NOx** **CO** **Stack Gas O2**
C. Method of monitoring: Condition 1 & 2 -3/3/2020 Source Test demonstrated compliance Condition 3 – Only Natural Gas was used for the 2020 calendar year. Condition 4 – Instructional Condition; Certification not applicable. Condition 5 – No alternate fuel utilized. Source Test report furnished to District on time. Condition 6 – Compliance with applicable Section 7 flue gas recirculation requirements.	F. Currently in Compliance? **YES** **G. Compliance Status:** **Continuous** **H. *Excursions, Exceedence, or other non-compliance: No**

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

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

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

A. Attachment # or Permit Condition #: Section 6 – Attachment 74.34N2 (12/13/2016)	D. Frequency of monitoring: **Monthly**
B. Description: NOx Reductions from Miscellaneous Sources Condition 1- Perform combustion system maintenance in accordance with manufacturer's written instructions/specifications or according to good engineering practices focused on reliability and emission controls. Condition 2 - Document maintenance activities in a site specific combustion and emission controls sytems maintenance plan. The plan must be kept onsite and available to the APCD upon request. Condition 2 - Maintain records of combustion system maintenance and make availalbe to APCD upon request	E. Source test reference method: N/A
C. Method of monitoring: Condition 1 & 2 - Combustion system maintenance was performed for all applicable units in accordance with a site written plan and is available upon request. Condition 3 - Maintenance records including manufacturer's inspection reports for 2020 are on file and available upon request.	F. Currently in Compliance? **YES** G. Compliance Status: **CONTINUOUS** H. *Excursions, Exceedence, or other non-compliance: **NO**

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

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

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

A. Attachment # or Permit Condition #:
Section 6 – Attachment STRMLN15LM6000-NOx-rev291

D. Frequency of monitoring:
Monthly

B. Description: LM6000 Gas Turbine Based Cogeneration Unit

Condition 1, 2, 4, & 6 - NOx < 2.5 ppmvd avg. @ 15% O2 over 3 hr. period, Annual Source Test, and CEMs, ROC <2.0 ppmvd @ 15% O2 average over 3 consecutive hrs. Operate Oxidation Catalyst & test annually, Outlet Ammonia < 20 ppmvd verified annually via source test, PM < 3.08 lbs/MMscf & source test using ARB Method 5 upon District request
Condition 3: Emissions Exemption: 12 hr cold startup, 3 hr normal-startup, 2 hr unplanned load changes, and 1 hr shutdown
Condition 5.a-f - Source Test Annually at normal operating load. Test Notification and protocol submitted 15 days in advance with report submitted within 45 days of test to include permit specified parameters
Condition 7.a-l & 8.a-c - Operate and maintain CEMs & record permit specified data, CEMs calibration and maintenance per 40 CFR, part 51, Appendix P, Sections 3.0 through 3.9.5
Condition 9 - Written Notification of monitored emission standards violations within 96 hours
Condition 10.a-d & 11 - Permanent CEMs records, to include permit specified data, Upon request submit CEMs data to District
Condition 12 & 13 - CEMs data reduced per 40 CFR, part 51, appendix P, paragraphs 5.0 – 5.3.3. Records maintained per permit conditions
Condition 14.a-b - Turbine Operating hours report & annual source test report

E. Source test reference method
Source Test Summary Form 2 of 4

EPA Method 20 -NOx
ARB Method 100 -CO, O2
EPA Method 18 -ROC
ASTM Method D 3588-91 - Fuel HV
BAAQMD Method ST-1B-NH3

C. Method of monitoring:
Condition 1, 2, 4, 5, & 6 – Annual source test conducted on March 4, 2020.
C6ondition 2, 7, 10, 11, 13 – Recordkeeping.
Condition 3 – Exemptions applied as required throughout the calendar year.
Condition 5 – Utilize certified Source Test vendors, use specified test methods, and submit documentation per deadline requirements.
Condition 8 - Maintenance via operators with assistance from CEM manufacturer.
Condition 9 – Operational procedures ensure compliance with 96 hour reporting requirement.
Condition 12 – Data Acquisition System data reduction and recordkeeping per specification.
Condition 14 – Turbine report submitted semi-annually, source test submitted annually.

F. Currently in Compliance?
YES

G. Compliance Status:

INTERMENTENT

H. *Excursions, Exceedence, or other non-compliance:
NO

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

A. Attachment # or Permit Condition #: Section 6 – Attachment STRMLN15LM2500-NOx,CO-rev 391	D. Frequency of monitoring: **Monthly**
B. Description: GE LM-2500 Gas Turbine Based Cogeneration Unit NOx and CO Applicable Requirements Condition 1 – 3 Hour NOx average < 24 ppmvd @ 15% O2 while burning Natural Gas Condition 2 – Emissions Exemption: 1 hr for startup & shutdown Condition 3 – Source Test Annually at normal operating load. Test Notification and protocol submitted 15 days in advance with report submitted within 45 days after test to include permit specified parameters. Condition 4 – Operate and maintain CEMs & record permit specified data. Condition 5 – CEMs calibration and maintenance per 40 CFR, part 51, Appendix P, Sections 3.0 through 3.9.5. Condition 6 – Written Notification of emissions violations within 96 hours. Condition 7 – Permanent CEMs records, to include permit specified data. Condition 8 – Upon request submit CEMs data to District. Condition 9 – CEMs data reduced per 40 CFR, part 51, appendix P, paragraphs 5.0 – 5.3.3. Condition 10 – Records maintained per permit conditions. Condition 11 – Turbine Operating hours report & annual source test report.	E. Source test reference method **See Source Test Summary Form 3 of 4** EPA Method 20 -NOx ARB Method 100 -CO, O2 ASTM Method D 3588-91 - Fuel HV
C. Method of monitoring: Condition 1, 3 – Annual source test conducted on May 19, 2020 6Condition 1, 2, 4, 7, 8, 9, 10 – Recordkeeping Condition 5 – Maintenance via operators with assistance from CEMs manufacturer Condition 6 – Operational procedures ensure compliance with 96 hour reporting requirement Condition 11 – Turbine report submitted semi-annually, source test submitted annually	F. Currently in Compliance? **YES** **G. Compliance Status:** **INTERMENTENT** **H. *Excursions, Exceedence, or other non-compliance:** **NO**

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

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

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

A. Attachment # or Permit Condition #: Section 6 – Attachment NESHAP KK	D. Frequency of monitoring: **Monthly**
B. Description: 40 CFR Part 63 Subpart KK Applicable Requirements Condition 1 – Use < 10 Ton per 12 month rolling period of each HAP Condition 2 – Use < 25 tons total per 12 month rolling period for all HAPs Condition 3 – HAP exclusion for various activities Condition 4 – Considered Area Source if it complies with HAP limitations Condition 5 – Maintain monthly records and calculations of HAP materials and their HAP fractions Condition 6 – Provided 40 CFR 63.9(b) Notification	E. Source test reference method **N/A**
C. Method of monitoring: Conditions 1 – 6: In 2020, site maintained non-major HAP status by emitting less than 10 TPY of any one HAP and less than 25 TPY of all HAPs. HAP emission and mass fraction monthly records are maintained as required by permit condition.	F. Currently in Compliance? **YES**
	G. Compliance Status: **CONTINUOUS**
	H. *Excursions, Exceedence, or other non-compliance: **NO**

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

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

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

A. Attachment # or Permit Condition #:
Section 6 - Attachment 40CFR63 ZZZZN3

D. Frequency of monitoring:
Monthly

B. Description: 40 CFR Part 63 Subpart ZZZZ Applicable Requirements

Condition 1: Meet work practice standards including annual oil and filter changes, air cleaner inspections and belt/hose inspections. Report any delays due to emergency use to APCD.
Condition 2: Operate and maintain IC engines according to manufacturer's emission related instructions or per site plan to maintain and operate equipment consistent with good air pollution control practices.
Condition 3: RICE must be equipped with non-resettable hour meter.
Condition 4: Minimize idle time during startup and minimize startup time to safe engine loading time, not to exceed 30 minutes.
Condition 5: Limit non-emergency use of engines to no more than 100 hours per calendar year for maintenance and readiness testing and other allowed uses. Within this 100 hour allowance, limit hours for non-emergency non-maintenance/readiness testing (uses outlined in 63.6640 (f)) to no more than 50 hours per calendar year.
Condition 6: Maintain records of maintenance conducted on stationary emergency RICE and record hours of operation for emergency use and non-emergency uses to demonstrate compliance with Condition 5.
Condition 7 & 8: Non applicable condition - the site does not operate RICE for emergency demand response.
Condition 9: Annually certify that all engines operate in compliance with 40 CFR Part 63 Subpart ZZZZ.

E. Source test reference method
N/A

C. Method of monitoring:
Condition 1: Maintain records to demonstrate that annual oil and filter changes, air cleaner inspections and annual belt/hose inspections are completed. Report any delays due to emergency use to APCD.
Condition 2: Operate and maintain IC engines according to site plans for maintenance and operation consistent with good air pollution control practices.
Condition 3: RICE are currently equipped with non-resettable hour meters.
Condition 4: Minimize idle time during startup and minimize startup time to safe engine loading time, not to exceed 30 minutes
Condition 5: Compliance with hour limitations is demonstrated by records of hours of operation for emergency, non-emergency and non-emergency/non- maintenance or readiness testing use.
Condition 6: Maintain records of maintenance conducted on stationary emergency RICE and record hours of operation for emergency use and non-emergency uses to demonstrate compliance with Condition 5.
Conditions 7 & 8: Non-applicable condition - the site does not operate RICE for emergency demand response.
Condition 9: Annual Subpart ZZZZ compliance certification is satisfied by the ACC

F. Currently in Compliance?
YES

G. Compliance Status:
CONTINUOUS

H. *Excursions, Exceedence, or other non-compliance:
NO

Permit Section: 7

Permit Specific Conditions (Attachments)

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

A. Attachment # or Permit Condition #:

Section 7 – Attachment PO00015PC1-rev411, 431, 441

D. Frequency of monitoring: **Monthly**

B. Description: Throughput & Consumption Limits and Solvent Records

Condition 1 – Maintain Monthly throughput (emissions) records as detailed in Section No. 3 "Permitted Throughput and Consumption Limit Table.

Condition 2 – Maintain a list of all exempt solvents used , a reference to the specific permit exemption status and their ROC content and pounds used per rolling 12 month period.

Condition 3 - Permission to operate a rental boiler that is < 100 MMBTU/hr as an alternative to operating the 100 MMBTU/hr B-301 Boiler for up to 12 months. While in use, PO00015PC2 shall apply and PO00015PC4 shall not apply. The temporary boiler shall be equipped with Low NOx burners to meet the PO00015PC2 emissions limitations for the B-301 Boiler and the permittee shall maintain documentation that the temporary boiler meets the required emission limitations and records of usage of the temporary rental boiler.

E. Source test reference method

N/A

C. Method of monitoring:

Condition 1 – Monthly records of emissions specified in Table 3 throughput column are recorded.

Condition 2 – Exempt Solvent list maintained.

Condition 3 - Rental boiler was not used during this reporting period.

F. Currently in Compliance?
YES

G. Compliance Status
CONTINUOUS

H. *Excursions, Exceedance, or other non-compliance:
NO

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

A. Attachment # or Permit Condition #:

Section 7 – Attachment PO00015PC2-rev 411, 431, 441

D. Frequency of monitoring:
Monthly

B. Description: Combustion Emissions Units- LM6000, LM2500, B&W Steam Boiler, 1X Hot Air, 1X Yankee Furnace, 2X Furnaces

Condition 1 – Specifies monitoring requirements and calculations to demonstrate compliance with TPY emissions limits for Combustion Unit group identified in this condition.
Condition 2 – Restricts fuel used in specified combustion units to Natural Gas (NG)
Condition 3 – Maintain records: 12 mo. Rolling average fuel usage and emissions based on Emission Factors and CEM units specified in this condition and condition 1 above.
Condition 4 - The Table 4 CO hourly lb./hour for the LM2500 shall be demonstrated by the annual source test requirement in STRMLIN15LM2500-NOx, CO.
Condition 5 - The Table 4 CO hourly lb./hour for the LM600 shall be demonstrated by the annual source test requirement in STRMLIN15LM6000-NOx.
Condition 6 - Permission to operate a rental boiler that is < 100 MMBTU/hr as an alternative to operating the 100 MMBTU/hr B-301 Boiler for up to 12 months. While in use, PO00015PC2 shall apply and PO00015PC4 shall not apply. The temporary boiler shall be equipped with Low NOx burners to meet the PO00015PC2 emissions limitations for the B-301 Boiler and shall maintain documentation that the temporary boiler meets the B-301 emission limitations and records of usage of the temporary rental boiler.

E. Source test reference method
N/A

C. Method of monitoring:

Condition 1 – Monthly monitoring of emissions records to ensure compliance with combustion emission limits.

Condition 2 – Facility exclusively utilized PUC Natural Gas to fire all permitted combustion units at facility.

Condition 3 - CEMS data from the turbines is used to maintain 12 month rolling averages for NOx, CO, and NH3. All other 12 month rolling averages are maintained by Emission Factors and fuel use.

Condition 4 & 5 - Source Test records demonstrating the Table 4 limits for each turbine was performed and submitted per the STRMLN Requirements for each turbine.

Condition 6 - Alternative Operating Scenario was not utilized in RY2020

F. Currently in Compliance?
YES

G. Compliance Status
CONTINUOUS

H. *Excursions, Exceedance, or other non-compliance:
NO

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

A. Attachment # or Permit Condition #:

Section 7 – Attachment PO00015PC3-rev351

D. Frequency of monitoring:
Condtion 2 - Semi Annual
Condition 3 - Permit Term
Condition 4 - Bi Annual

B. Description: 2X Papermachine Hot Air Furnace and "Yankee" Hood Furnace Requirements

Condition 1 –Emission limitations: NOx < 0.08 lb./MMBTU, CO < 0.045 lb./MMBTU

Condition 2 –Fuel and air settings locked in position as specified in permit. Settings recorded every 6 months

Condition 3 – Source test the Pre Dryer Hot Air Furnance and Yankee Hot Air Furnace once every 24 months using ARB Method 100 for NOx, CO and O2. Notification & Test Protocol to District 15 days in advance. Report within 45 after test. before March 28, 2020 using ARB Method 100 for NOx, CO and O2. Notification & Test Protocol to District 15 days in advance. Report within 45 after test.

E. Source test reference method:
ARB Method 100:
NOx
CO
Stack Gas O2
See Source Test Form 4 of 4

C. Method of monitoring:

Condition 1 - Both Furnaces demonstrated compliance to the NOx and CO limits per their last Source Test 5/26/20

Condition 2 – Fuel Linkage settings for the Yankee and Hot Air Furnaces were monitored in January and July to meet requirement

Condition 3 - Condition requirements were met as demonstrated in the most recently submitted Source Test Report.

F. Currently in Compliance?
YES*

G. Compliance Status:
INTERMITTENT**

H. *Excursions, exceedances, or other non-compliance:

Possible exception to continious compliance***
*See deviation summary

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

A. Attachment # or Permit Condition #:

Section 7 – Attachment PO00015PC4 –rev 411, 431, 441

D. Frequency of monitoring:
Monthly

B. Description: Flue Gas Recirculation (FGR) Requirements for Babcock & Wilcox Steam Boiler

Condition 1.a-b – FGR system settings locked (physically pinned) in place per permit specifications. Parameters to be monitored, measured, and recorded on monthly basis.

E. Source test reference method
N/A

C. Method of monitoring:

Parameters to be monitored, measured, and recorded on monthly basis.

F. Currently in Compliance?
YES

G. Compliance Status:
CONTINUOUS

H. *Excursions, Exceedance, or other non-compliance:
NO

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

A. Attachment # or Permit Condition #:

Section 7 – Attachment PO00015PC5-rev 441

D. Frequency of monitoring: **Monthly**

B. Description: Particulate Matter Emission Requirements 1X Paper Machine, 2X Paper Machine, Wet Lapper and Converting Line Rooms

Condition 1: Emission Limitations: 1X PM < 6.75 lbs/hr., 2X PM < 3.99 lbs/hr., Wet Lapper < 0.10

Condition 2: To demonstrate compliance with emission limitations, daily average of hourly readings of scrubber pressure drop and liquor flow rate for 1X, 2X and wet lapper scrubbers shall be recorded and maintained no less than the values specified in this condition.

Condition 3.a-e: Daily Record not required for less than full day operation. Excursions to be corrected expeditiously, meters and gauges maintained per facility plan, and made available upon request. Excursions require summary of corrective actions. Semi annual report of Excursions.

Condition 4.a-b: PM emissions must meet limitations specified in Rules 52 and 53 (table limits in each rule)

Condition 5: Compliance with Rule 52 & 53 achieved with compliance with Condition 1 and 2

Condition 6: Converting room emissions shall be re-circulated back into room

E. Source test reference method **N/A**

C. Method of monitoring:

Condition 1-2, 4-5: 1X, 2X, and Wet Lapper Scrubber operation to ensure Pressure Drop, and Liquor Flow Rate are not less than the permit specified values.

Condition 3 –Records of Hourly and Daily operation kept. Permitee will respond to any excursion as specified in the permit and will document and submit corrective action in the Semi Annual Report as required by the permit.

Condition 6 – Converting Room emissions are circulated back into room via equipment listed in the Section 5 Insignificant Activities List.

F. Currently in Compliance? **YES**

G. Compliance Status: **CONTINUOUS**

H. *Excursions, Exceedance, or other non-compliance: **NO**

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

A. Attachment # or Permit Condition #:
Section 7 – Attachment PO00015PC6-rev351

D. Frequency of monitoring:
Monthly

B. Description: ROC Emission Requirements Manufacturing Chemicals for Ink and Additive Applications

Condition 1 – ROC Emission limit for manufacturing chemicals used in inks and additives for producing, converting, and packaging toilet tissue and paper towels shall not exceed 60 tons per year in any 12 month period.

Condition 2 – Maintain monthly records of ROC emissions from manufacturing chemicals used in inks and additives for producing, converting and packaging toilet tissue and paper towels and demonstrate compliance based on 12-month rolling average emissions.

E. Source test reference method
N/A

C. Method of monitoring:

Condition 1 – Facility ROC emissions rates are recorded and tracked to ensure 12 month rolling totals maintained below 60 TPY

Condition 2 – Maintain monthly usage data for ROC containing manufacturing chemicals

F. Currently in Compliance?
YES

G. Compliance Status
CONTINUOUS

H. *Excursions, Exceedance, or other non-compliance:
NO

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

A. Attachment # or Permit Condition #:

Section 7 – Attachment PO00015PC7-rev391

D. Frequency of monitoring:
Monthly

B. Description: Federal PSD Permit Requirements- Cogeneration Turbine (LM-6000), Cogeneration Turbine (LM-2500),Babcock & Wilcox Steam Boiler, 1X Paper Machine Hot Air Furnace, and 1X Papermachine "Yankee" Hood Furnace

Condition 1 – If request increase in permitted NOx emissions for specified combustion sources above 250 TPY, submit PSD application for LM6000 turbine

E. Source test reference method
N/A

C. Method of monitoring:

Condition 1 – If request increase in NOx emissions in excess of 250 TPY, will submit PSD application for LM6000 turbine.

F. Currently in Compliance?
YES

G. Compliance Status:
CONTINUOUS

H. *Excursions, Exceedance, or other non-compliance:
NO

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

A. Attachment # or Permit Condition #:

Section 7 – Attachment PO00015PC8

D. Frequency of monitoring:
Monthly

B. Description: ERC Certificate No. 1166

Condition 1 – All motor vehicle parking and traffic on paved roads or paved parking lots, except for emergencies, construction, maintenance and agricultural use.

E. Source test reference method
N/A

C. Method of monitoring:

Condition 1 – Access to unpaved areas is restricted except for non routine access during emergencies or for maintenance and construction activities. Signs indicating prohibition for parking, and travel over unpaved areas are posted throughout site. Parking and traffic expectations communicated to facility and enforced by facility personnel

F. Currently in Compliance?
YES

G. Compliance Status:
CONTINUOUS

H. *Excursions, Exceedance, or other non-compliance:
NO

Permit Section: 8

General Applicable Requirements (Attachments)

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

A. Attachment # or Permit Condition #:

Section 8 – Attachment Rule 50 (8/20/2020)

D. Frequency of monitoring:
Monthly

B. Description: Opacity

Condition 1 – Do not discharge into the atmosphere any air contaminants for > 3 minutes in one hour which are as dark or darker than No. 1 on the Ringleman Chart or equal to or greater than 20% Opacity

Condition 2 – Periodic "Quarterly" Surveillance and record of visible emissions other than uncombined water

Condition 3 – Annual compliance certification, including site survey

Condition 4 – Per District Request, Opacity is determined by a person certified in reading smoke using EPA Method 9 or a certified and calibrated monitoring system

E. Source test reference method:
N/A

C. Method of monitoring:

Condition 1 & 2 – No visible emissions were observed in 2020

Condition 3 - Quarterly Opacity Survey completed on 2/21/20, 3/19/20, 5/26/20, 8/20/20

Condition 4 - Per District request, a certified, calibrated monitoring system or a person certified in EPA Method 9 will determine Opacity

F. Currently in Compliance?
YES

G. Compliance Status:
CONTINUOUS

H. *Excursions, Exceedence, or other non-compliance:
NO

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

A. Attachment # or Permit Condition #:

Section 8 – Attachment 54.B.1 (01/14/14)

D. Frequency of monitoring:
Monthly

B. Description: Sulfur Compounds – Sulfur Emissions from Combustion Operations at Point of Discharge

Condition 1 – Point of Discharge SO2 concentrations < 300 ppmvd (corrected to 3% oxygen for boilers and 15% oxygen for turbines), from combustion operations specified.

Condition 2 – Comply with fuel Sulfur content limits per Rule 64. No monitoring required.

Condition 3 – Upon District Request determine point of Discharge concentrations of SO2

E. Source test reference method:
N/A

C. Method of monitoring:

Condition 1 – Compliance with permit condition Attachment P00015PC2. Only PUC-quality natural gas and CARB approved diesel used on site in 2020

Conditions 2 – Fuel Oil Sulfur Content provided by supplier at each delivery. Gaseous sulfur content meeting PUC Quality requirements. Data furnished to district upon request.

Condition 3 – Furnish District with data upon request.

F. Currently in Compliance?
YES

G. Compliance Status:
CONTINUOUS

H. *Excursions, Exceedence, or other non-compliance:
NO

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

A. Attachment # or Permit Condition #:

Section 8 - Attachment 54.B.2 (01/14/14)

D. Frequency of monitoring:
Monthly

B. Description: Sulfur compounds – SO2 Concentrations

Condition 1 – Property Line SO2 concentrations: 1 hr. < 0.25 ppmvd, 24 hr. < 0.04 ppmvd

Condition 2 - Property line 1 hour sulfur dioxide limit of 0.075 ppm

Condition 3 – Provide fuel or exhaust analysis along with modeling data or other demonstration to District upon request

Condition 4a-c – Upon District Request determine ground level concentrations of SO2

E. Source test reference method:
N/A

C. Method of monitoring:

Condition 1 - Compliance with permit condition Attachment P00015PC2. Only PUC-quality natural gas, and CARB approved diesel used on site in 2020

Conditions 2 – If the District requires ambient air monitoring, test methods specified will be employed.

Conditions 3 - Fuel Analysis provided by suppliers at request of facility. Exhaust analysis based on emissions factors incorporated into facility AB2588 Health Risk Assessment.

Condition 4– Furnish District with data upon request.

F. Currently in Compliance?
YES

G. Compliance Status:
CONTINUOUS

H. *Excursions, Exceedence, or other non-compliance:
NO

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

A. Attachment # or Permit Condition #:

Section 8 – Attachment 55 (06/10/08)

D. Frequency of monitoring:
Monthly

B. Description: Fugitive Dust

Condition 1 – Do not cause or allow fugitive dust such that is visible past the property line.

Condition 2 – Do not cause of allow fugitive dust to cause 20% opacity as measured by EPA Method 9 using Rule 55 modifications.

Condition 3 – Do not allow "track-out" to extend ≥25ft unless control measures are utilized

Condition 4 - Remove all "track-out" at the conclusion of each workday or evening shift

Condition 5 - Comply with specific activity requirements for earth moving, bulk material handling, and truck hauling activities

Condition 6- Comply with specific record keeping requirements for each type of activity

Condition 7 - Annually certify that all applicable source of dust are in compliance or certify that there are no operations, disturbed surface areas, or man made conditions that are subject to Rule 55.

E. Source test reference method:
N/A

C. Method of monitoring:

Condition 1-2– Routine activities do not result in fugitive dust causing visible emissions beyond specified boundaries. Outdoor projects are controlled and monitored such that Conditions 1-2 are met.

Condition 3 – Site property is such that the possibility of track out is minimized. For projects where the possibility of track out exists – vehicles are inspected and managed to prevent track out.

Condition 4 – When applicable, Track Out is removed at the conclusion of each workday or shift.

Condition 5 – Site utilizes procedures and methods for prevent fugitive dust.

Condition 6 – When required, records are kept.

Condition 7 – Ongoing assessment of site activity to ensure Rule 55 compliance.

F. Currently in Compliance?
YES

G. Compliance Status:
CONTINUOUS

H. *Excursions, Exceedence, or other non-compliance:
NO

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

A. Attachment # or Permit Condition #:

Section 8 – Attachment 57.1 (01/11/05)

D. Frequency of monitoring:
Monthly

B. Description: Particulate Matter Emissions from Fuel Burning Equipment

Condition 1 – PM shall not exceed 0.12 lbs/Mmbtu

Condition 2 – Compliance demonstration required upon district request

Condition 3 – Periodic monitoring not required. Certify compliance by referring to District Rule 57.B analysis dated 12/3/97

E. Source test reference method:
N/A

C. Method of monitoring:

Condition 1 – Satisfy Conditions 2 & 3 of this attachment.

Condition 2 – Monitoring is not required based on district analysis (Per comments in permit, Table 1.C.3, Condition 57.1)

Condition 3 – Periodic monitoring is not required. Compliance certified via District analysis of Rule 57.B, dated 12/3/97.

F. Currently in Compliance?
YES

G. Compliance Status:
CONTINUOUS

H. *Excursions, Exceedence, or other non-compliance:
NO

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

A. Attachment # or Permit Condition #:

Section 8 – Attachment 64.B.1 (04/13/99)

D. Frequency of monitoring:
Monthly

B. Description: Sulfur Content of Fuels – Gaseous Fuel Requirements

Condition 1 – Gaseous Fuel sulfur compounds < 788 ppmvd

Condition 2 – Periodic Monitoring not required if using PUC Natural Gas

Condition 3 – Analyze fuel if using non-PUC quality fuel

Condition 4a-b – Monitoring required if landfill or oilfield gaseous fuel is used

E. Source test reference method:
N/A

C. Method of monitoring:

Conditions 1-4: Maintain records showing that only PUC Quality natural gas is used, therefore no other monitoring is required. Facility does not use landfill or oilfield gaseous fuel.

F. Currently in Compliance?
YES

G. Compliance Status:
CONTINUOUS

H. *Excursions, Exceedence, or other non-compliance:
NO

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

A. Attachment # or Permit Condition #:

Section 8 – Attachment 64.B.2 (04/13/99)

D. Frequency of monitoring:
Monthly

B. Description: Sulfur Content of Fuels – Liquid Fuel Requirements

Condition 1 – No liquid Fuel usage with sulfur content > 0.5% by weight

Condition 2 – If only use ARB quality liquid fuel compliance is assured without monitoring

Condition 3 – Requirements for use of non ARB liquid fuels

E. Source test reference method:
N/A

C. Method of monitoring:

Conditions 1 & 2 – Maintain records of exclusive use of ARB compliant liquid fuel used on site in 2019 – No other monitoring is required.

Condition 3 – Monitor per permit requirements if use non-ARB quality liquid fuel

F. Currently in Compliance?
YES

G. Compliance Status:
CONTINUOUS

H. *Excursions, Exceedence, or other non-compliance:
NO

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

A. Attachment # or Permit Condition #:

Section 8 – Attachment 74.6 (03/15/19)

D. Frequency of monitoring:
Monthly

B. Description: Surface Cleaning and Degreasing

Condition 1.a-c: Limitations on use of solvents in surface cleaning. Solvents used for equipment cleanup and other cleanup of uncured coatings, adhesives, inks or resings and used for cleaning of electronic components shall not exceed < 900 g/l ROC & < 33 mmHg partial pressure. Cleaning solvents used for other purposes shall not exceed 25 g/l as applied.
Condition 2.a-d: If use solvents > 25 g/l ROC are used, one of the specified cleaning methods must be employed. Specified methods include wipe cleaning; non-atomized solvent flow, dip, or flush with solvent collection and solvent capacity of less than 1 liter (unless cleaning equipment stated in conditions 8-10 are used), or solvent application from hand held spray or squirt bottle with a cpacity of less than one liter; or use of enclosed gun washer.
Condition 3: No liquid cleaning solvent leaks from equipment or containers.
Condition 4: No solvents shall be solicited, supplied, sold, or used that would violate Rule 74.6.
Condition 5: Use less than one gallon of halogenated solvents per week for cold cleaning. If use maintain records.
Condition 6: Solvent stored in non-absorbent containers and closed except for filling or emptying.
Condition 7: Dispose of solvents and solvent residues as specified in California Hazardous Waste Code.
Condition 8.a-f: Cold Cleaning equipment requirements, except for remote reservoir cold cleaners.
Condition 9.a-e: Remote Reservoir cold cleaner equipment requirements.
Condition 10.a-g: Cold Cleaner operating requirements.
Condition 11.a-h: Rule 74.6 exemptions
Condition 12.a-o: Condition 1 exemptions
Condition 13: Condition 1 and 2 exemptions
Condition 14.a-d: Solvent Material recordkeeping requirements. Upon district request, make information available to district personnel
Condition 15: Maintain records and perform routine surveillance of solvent cleaning activities

E. Source test reference method:
N/A

C. Method of monitoring:

Conditions 1–4, 6-7: Compliance for permit conditions pertaining to solvent storage and handling is satisfied via personnel training and observation. Chemical Approval System ensures conformity with solvent ROC content limits.

Condition 5: Facility does not use halogenated cold cleaner solvents

Conditions 8-10: Cold cleaners are exempt per section 5 of Site Title V permit.

Condition 11: Exempted Solvents including Cold Cleaner Solvent is maintained on Surface Cleaning and Degreasing List

Condition 14: Recordkeeping per permit requirements.

Condition 15: Visual surveillance performed routinely. Site uses chemical approval process to confirm that only ROC content acceptable solvents are purchased and used on site.

F. Currently in Compliance?
YES

G. Compliance Status:
CONTINUOUS

H. *Excursions, Exceedence, or other non-compliance:
NO

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

A. Attachment # or Permit Condition #:

Section 8 – Attachment 74.11.1 (9/11/12)

D. Frequency of monitoring:
Monthly

B. Description: Large Water Heaters and Small Boilers

Condition 1.a-b: Requirements for new small boilers and heaters (75-400 MBTU/hr) installed after January 1, 2013 but before January 1, 2014

Condition 2.a-b: New units installed after January 1, 2014 which are >/= 75 MBTU/hr and </= 400 MBTU/hr must meet specified NOx limits and be certified in accordance with Rule 74.11.1.C.

Condition 3 a-b: New units installed after January 1, 2013 >/= 400 MBTU/hr and < 1,000 MBTU/hr must meet specified NOx limits and be certified in accordance with Rule 74.11.1.C.

Condition 4 – Maintain a list-of manufacturer, brand name, model #, heat input rating, and installation date for each applicable unit. Submit upon request.

Condition 5 - Certify annually and include a formal survey identifying each unit and documentation of certification status.

E. Source test reference method:
N/A

C. Method of monitoring:

Conditions 1-5: Facility does not presently utilize Heaters or Boilers that are rated at 75 – 1,000 MBTU/hr., thus facility is not subject to equipment certification, recordkeeping, and annual survey requirements

F. Currently in Compliance?
YES

G. Compliance Status:
CONTINUOUS

H. *Excursions, Exceedence, or other non-compliance:
NO

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

A. Attachment # or Permit Condition #:

Section 8 – Attachment 74.22

D. Frequency of monitoring:
Monthly

B. Description: Natural Gas-Fired Fan-Type Central Furnaces

Condition 1.a-b: New fan type central furnaces require NOx < 40ng per Joule Output

Condition 2: Maintain list of fan types with permit specified data

Condition 3: Annual survey of fan furnaces

E. Source test reference method:
N/A

C. Method of monitoring:

Conditions 1–3: Facility has not installed nor does the site currently operate any natural gas-fired, fan-type central furnaces on-site. Thus, the rule is not applicable at the facility.

F. Currently in Compliance?
YES

G. Compliance Status:
CONTINUOUS

H. *Excursions, Exceedence, or other non-compliance:
NO

Permit Section: 9-11

General Requirements for Short-Term Activities (Attachments)

General Permit Conditions

Miscellaneous Federal Program Conditions

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

A. Attachment # or Permit Condition #:

Section 9 – Attachment 74.1 (12-07-2017)

D. Frequency of monitoring: **Monthly**

B. Description: Abrasive Blasting

Condition 1.a-c: Abrasive Blasting shall be conducted indoors, using specified methods

Condition 2.a-d: For Outdoor blasting use steel or iron shot/grit or utilize specified alternate methods

Condition 3 – Adhere to Rule 74.1.B.2 requirements for pavement marking

Condition 4 – Stucco and concrete blasting per Rule 74.1.B.3

Condition 5 – Use California approved and labeled materials for abrasive blasting

Condition 6 – Comply with visible emissions standard per rule 74.1.C.2

Condition 7 - Monitor abrasive blast operations to ensure compliance with Rule 74.1, maintain records to satisfy the information requirements in conditions 7a-e, maintain records on site, and submit to the District upon request

E. Source test reference method: **N/A**

C. Method of monitoring:

Condition 1.a-c: Abrasive Blasting shall be conducted indoors, using specified methods

Condition 2.a-d: Approved abrasive blasting material was used for outdoor blasting.

Condition 3 – Adhere to Rule 74.1.B.2 requirements for pavement marking

Condition 4 – No stucco or concrete blasting occurred in 2019

Condition 5 – Use California approved and labeled materials for abrasive blasting

Condition 6 – Comply with visible emissions standard per rule 74.1.C.2

Condition 7.a-e: Monitoring records are maintained for each short term abrasive blast operation, when applicable

F. Currently in Compliance? **YES**

G. Compliance Status: **CONTINUOUS**

H. *Excursions, Exceedence, or other non-compliance: **NO**

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

A. Attachment # or Permit Condition #:

Section 9 – Attachment 74.2

D. Frequency of monitoring:
Monthly

B. Description: Architectural Coatings

Condition 1.a-c: VOC Coating content limits, less water and exempt OC's, Flat <100 g/l; Nonflat <150 g/l; Nonflat High Gloss <250 g/l

Condition 2 – Specialty coatings shall conform with Rule 74.2 Table of Standards. Industrial Maintenance <250 g/l less water & exempt OC's

Condition 3 – Architectural coatings and cleaning materials to remain closed except when in use.

Condition 4 – Adhere to Rule 74.2.B.1 thinning requirements

Condition 5 – Conduct periodic facility inspections and an annual compliance certification of architectural coating operations to ensure compliance with Rule 74.2

Condition 6 – VOC content and other properties measured per procedures in Rule 74.2.G

E. Source test reference method
N/A

C. Method of monitoring:

Condition 1, 2 – All paints used at facility are reviewed for compliance prior to approval for use.

Condition 3 – Closure requirements are documented / training provided to all site personnel and contractors.

Condition 4 – The facility prohibit the thinning of paints and coatings if thinning can cause the paint or coating to exceed it's specified limit.

Condition 5 – Visual observations occur routinely. VOC data maintained for each coating via vendor supplied SDS. Data will be furnished to District upon request.

Condition 6 – Architectural coating properties determined using vendor supplied data.

F. Currently in Compliance?
YES

G. Compliance Status:
CONTINUOUS

H. *Excursions, Exceedence, or other non-compliance:
NO

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

A. Attachment # or Permit Condition #:

Section 9 – Attachment 74.28

D. Frequency of monitoring:
Monthly

B. Description: Asphalt Roofing Operations

Condition 1 – Kettles shall operate with lids. Lid will not be opened unless temperature is < 150oF

Condition 2 – Max Temperatures: Asphalt < 500oF, Coal tar pitch < 400oF

Condition 3 – Lid to remained closed, and receiving containers to be covered

Condition 4 – Kettle vents to remain closed at all times

Condition 5 – Facility will verify Rule 74.28 requirements met during projects

E. Source test reference method
N/A

C. Method of monitoring:

Conditions 1-5: Internal administrative procedures. Permits and conditions were met in Rule 74.28 during 2020 roofing restoration.

F. Currently in Compliance?
YES

G. Compliance Status:
CONTINUOUS

H. *Excursions, Exceedence, or other non-compliance:
NO

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

A. Attachment # or Permit Condition #:

Section 9 - Attachment 40 CFR 61.M

D. Frequency of monitoring:
Monthly

B. Description: National Emissions Standards for Asbestos

Condition 1 – Comply with 40 CFR part 61, Subpart M

Condition 2 – Adhere to 40 CFR part 61.145 requirements for Demolition and Renovation.

E. Source test reference method
N/A

C. Method of monitoring:

Condition 1 – Site Asbestos abatement program managed consistent with 40 CFR Part 61, Subpart M. State certified contractors are utilized for ACM demolition and renovation. Adherence with 40 CFR Part 61.145 is mandatory for job approval.

Condition 2 – ACM demolition and renovation are observed by site resources to ensure compliance with 40 CFR Part 61.145. Activities involving ACM recorded are filed with Site Environmental Leader. Notification is provided to District prior to ACM renovation or demolition for activities requiring notification.

No applicable activities occurred during 2020

F. Currently in Compliance?
YES

G. Compliance Status:
CONTINUOUS

H. *Excursions, Exceedence, or other non-compliance:
NO

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

A. Attachment # or Permit Condition #:

Section 10 – District General Part 70 Permit Conditions

D. Frequency of monitoring:
Monthly

B. Description: District General Part 70 Permit Conditions

Condition 1 – Comply with all federally enforceable conditions, and all applicable requirements specified in the permit
Condition 2 – Comply with new applicable requirements that become effective during the permit terms in a timely manner
Condition 3 – Promptly report deviations within 4 hours of detection
Condition 4 – The need to halt / reduce activity is not a defense against enforcement action
Condition 5 – Retain all required records, monitoring data and support information for at least 5 years
Condition 6 – Provide requested information to District in a timely manner
Condition 7.a-d: Facilitate permit specified District inspection rights
Condition 8 – Permit may be modified, revoked, reopened, reissued or terminated for cause
Condition 9.a-d: Permit will be reopened per permit specified reasons
Condition 10 – All fees shall be paid on timely basis
Condition 11 – Permit does not convey property rights
Condition 12 – One invalid term / condition does not invalidate the entire permit
Condition 13 – Renewal application must be submitted between 6 to 18 months prior to expiration
Condition 14 – Part 70 requires all applications, reports or other data that must be submitted per the Title V permit to be certified by the responsible official.
Condition 15 – Annual Part 70 Compliance Certification

E. Source test reference method
N/A

C. Method of monitoring:

Condition 1, All deviations from Title V requirements are reported as required.

Condition 2, 4, 7-9, 11-12: Not applicable - Instructional conditions.

Condition 3 – Internal administrative procedures.

Condition 5 – Electronic databases and hard copy archives used for 5 year data retention.

Condition 6 – Reports submitted to district

Condition 10 – Internal Administrative procedures. Records of payments exist.

Condition 13, 15: Internal Administrative procedures

F. Currently in Compliance?
YES

G. Compliance Status:
Intermittent

H. *Excursions, Exceedence, or other non-compliance:
NO

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

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

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

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

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

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

A. Attachment # or Permit Condition #: Section 10 – Shield 60Dc	D. Frequency of monitoring: **Monthly**
B. Description: Permit Shield – 40 CFR Part 60, Subpart Dc, "Standards of Performance for Small Industrial - Commercial - Reference Information Only	E. Source test reference method **N/A**
C. Method of monitoring: Not Applicable - Reference Information only	F. Currently in Compliance? **YES**
	G. Compliance Status: **CONTINUOUS**
	H. *Excursions, Exceedence, or other non-compliance: **NO**

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

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

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

A. Attachment # or Permit Condition #:

Section 10 – Attachment PO General

D. Frequency of monitoring: **Monthly**

B. Description: General Permit to Operate Conditions

Condition 1 – Can petition Hearing Board within 30 days of receiving permit to alter conditions.

E. Source test reference method **N/A**

C. Method of monitoring:

Condition 1 – Reference Information only.

Condition 2 – Table 2 posted close to equipment and remainder of permit available electronically everywhere in plant.

Condition 3 – Permit and sources are not transferred or located in alternate locations.

Condition 4 – Information requested by District is furnished within requested time.

F. Currently in Compliance? **YES**

G. Compliance Status: **CONTINUOUS**

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

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

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2020 - December 31, 2020

A. Attachment # or Permit Condition #: Section 11 – Attachment 40 CFR Part 82 (04/10/15)	D. Frequency of monitoring: **Monthly**
B. Description: Protection of Stratospheric Ozone Condition 1 – Subject to 40 CFR part 82, Subpart B if perform service on motor (fleet) vehicles	E. Source test reference method **N/A**
C. Method of monitoring:	F. Currently in Compliance? **YES**
Condition 1– Facility does not maintain or otherwise service fleet vehicles at facility. Not subject to requirements specified in permit condition. Condition 2 – Internal administrative procedures to implement and manage applicable 40 CFR Part 82, Subpart F requirements.	G. Compliance Status: **CONTINUOUS**
	H. *Excursions, Exceedence, or other non-compliance: **NO**

Deviations

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
SIGNATURE COVER FORM

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

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

Confidentiality

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

Certification by Responsible Official

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

Signature and Title of Responsible Official:	Date:
Title: Plant Manager	2/10/2021

Time Period Covered by Compliance Certification

01 / 01 / 20 (MM/DD/YY) to 12 / 31 / 20 (MM/DD/YY)

Ventura County
Air Pollution
Control District

RESPONSIBLE OFFICIAL'S CERTIFICATION FORM

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

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

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

Certification by Responsible Official

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

Signature and Title of Responsible Official:	Date:
Signature: [signature]	2/10/2021
Title: Plant Manager	

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

February 10, 2021

Mr. Keith Macias
AQS, Inspector
Ventura County APCD
669 County Square Drive
Ventura, California 93003

Subject: RY2020 Annual Title V Compliance Certification and Semi-Annual Deviation Report

Mr. Macias:

Enclosed is The Procter & Gamble Paper Products Company's Oxnard facility, Part 70 Permit No. 00015 Compliance Certification for the January 1, 2020 through December 31, 2020 reporting period. This submission also constitutes the Semi-Annual Deviation Report for the time period July 1, 2020 – Dec 31, 2020.

I can be reached at 805-485-8871, X 2408 or stines.cg@pg.com should you have any questions about our facilities certification.

Respectfully,

Mrs. Cindy Stines
Site Environmental Systems Leader

Cc:
Mr. Marvelle Berry, Plant Manager; P&G
Mr. Sokny Field, HS&E Leader; P&G
Ms. Chris Cote, AQS; VCAPCD

Ventura County
Air Pollution
Control District

DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 01/01/2020 to 12/31/2020

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period:
Rule 32 Excess Emissions Report	B301 Source Test Failure	Dates: 3/2/20 **When Discovered:** Date: 3/2/20
D. Parameters monitored:	**E. Limit:**	**F. Actual:**
B301 CO Emissions Source Test Failure	400 ppm	>400
G. Probable Cause of Deviation	**H. Corrective actions taken:**	
On March 3rd 2020, the boiler repair service determined that the O- rings on the Master Controller were defective	On March 3rd 2020, the boiler repair service determined that the O- rings on the Master Controller were defective. They were removed and replaced with new O-rings. The unit was restarted for the purpose of demonstrating the repair was complete. Upon demonstration that the repair was complete, P&G resources, Horizon Air Measurement Services Inc, and VCAPCD representative Ed Swede performed and observed a new source test. The results of the source test performed on March 3rd 2020, demonstrate compliance with Rule 74.15.B1 as required in Condition 1 of attachment 74.15N1 in P&G's Title V permit.	

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period:
Attachment 74.15N1 Condition 2 Rule 74.15.B.1	2X Paper Machine	Date 01/01/2020 - 06/30/2020 **When Discovered:** Date: 5/20/20
D. Parameters monitored:	**E. Limit:**	**F. Actual:**
Oxygen % NOx MMBtu limit 0.08 CO MMBtu limit is 0.0386	Biannual Source Test Date	5/26/20

Ventura County
Air Pollution
Control District

DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 01/01/2020 to 12/31/2020

G. Probable Cause of Deviation	H. Corrective actions taken:
P&G was unable to complete the emissions testing program on the 2X Paper Machine due to operational limitations with the Hot Air Furnace Burner.	On Wednesday May 20, 2020, P&G was unable to complete the emissions testing program on the 2X Paper Machine due to operational limitations with the Hot Air Furnace Burner. The emissions test program was originally delayed due to complications that occurred as a result of the damage and repairs resulting from fire on 03/30/2020. The operational limitations experienced during testing prevented P&G from achieving normal operations. Before the Hot Air Furnace Burner was shut down due to operational issues that prevented normal operations to be achieved, P&G observed elevated CO concentrations on the Hot Air Furnace Burner. The Hot Air Furnace Burner was shut down on Wednesday May 20, 2020 and remained nonoperational until the commencement of the burner inspection, tuning, and testing activities on Tuesday May 26, 2020. Emissions testing was completed on the 2X Paper Machine on May 26, 2020 by Horizon Air Measurement Services, Inc. The emissions test program demonstrated that the 2X paper machine is in compliance with the permitted NOX and CO emissions limits contained in the facility's Title V Operation Permit (TVOP). While the delay in completing the test report and did not cause a deviation from any TVOP conditions, P&G is conservatively including the original non-completion of the test program on May 20, 2020 on this deviation report to be consistent with previous communications with the Ventura County Air Pollution Control District (VCAPCD).

Source Tests

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
SIGNATURE COVER FORM

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

Confidentiality

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

Certification by Responsible Official

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

Signature and Title of Responsible Official:	Date:
Title: Plant Manager	2/10/2021

Time Period Covered by Compliance Certification

01 / 01 / 20 (MM/DD/YY) to 12 / 31 / 20 (MM/DD/YY)

Ventura County
Air Pollution
Control District

RESPONSIBLE OFFICIAL'S CERTIFICATION FORM

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

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

Certification by Responsible Official

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

Signature and Title of Responsible Official:	Date:
Signature: [signature]	2/10/2021
Title: Plant Manager	

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: January 1, 2020- December 31, 2020

A. Emission Unit Description:			B. Pollutant
B-301 Boiler			**NOx**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
23.50 ppm @3% O2	**40 ppm @ 3% O2**	**P27-076-FR B301**	**3/2/2020**

A. Emission Unit Description:			B. Pollutant
B-301 Boiler			**CO**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
793.00 ppm @ 3% O2	**400 ppm @ 3% O2**	**P27-076-FR B301**	**3/2/2020**

A. Emission Unit Description:			B. Pollutant
B-301 Boiler			**NOx**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
28.80 ppm @3% O2	**40 ppm @ 3% O2**	**P27-076-FR B301**	**3/3/2020**

A. Emission Unit Description:			B. Pollutant
B-301 Boiler			**CO**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
201.00 ppm @ 3% O2	**400 ppm @ 3% O2**	**P27-076-FR B301**	**3/3/2020**

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: January 1, 2020- December 31, 2020

A. Emission Unit Description:			B. Pollutant
LM2500 Turbine			**NOx**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
19.40 ppm @ 15% O2	**24 ppm @ 15% O2**	**P27-077-FR COMP-C1**	**5/19/2020**

A. Emission Unit Description:			B. Pollutant
LM2500Turbine			**CO**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
33.30 lb/hour	**180.13 lb/hour**	**P27-077-FR COMP-C1**	**5/19/2020**

A. Emission Unit Description:			B. Pollutant
LM2500 Turbine			**O2**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
14.30 %	**N/A**	**P27-077-FR COMP-C1**	**5/19/2020**

A. Emission Unit Description:			B. Pollutant
LM2500 Turbine			**Heat Rate**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
243.00 MMbtu/hour	**N/A**	**P27-077-FR COMP-C1**	**5/19/2020**

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: January 1, 2020- December 31, 2020

A. Emission Unit Description:			B. Pollutant
LM2500 Turbine			**NOx**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
19.40 ppm @ 15% O2	**24 ppm @ 15% O2**	**P27-077-FR COMP-C1**	**5/19/2020**

A. Emission Unit Description:			B. Pollutant
LM2500Turbine			**CO**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
33.30 lb/hour	**180.13 lb/hour**	**P27-077-FR COMP-C1**	**5/19/2020**

A. Emission Unit Description:			B. Pollutant
LM2500 Turbine			**O2**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
14.30 %	**N/A**	**P27-077-FR COMP-C1**	**5/19/2020**

A. Emission Unit Description:			B. Pollutant
LM2500 Turbine			**Heat Rate**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
243.00 MMbtu/hour	**N/A**	**P27-077-FR COMP-C1**	**5/19/2020**

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: January 1, 2020- December 31, 2020

A. Emission Unit Description:			B. Pollutant
LM6000 Turbine			**NOx**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
2.25 ppm @ 15% O2	**2.5 ppm @ 15% O2**	**P27-077-FR-COMP**	**3/4/2020**

A. Emission Unit Description:			B. Pollutant
LM6000 Turbine			**CO**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
3.74 lb/hour	**10.20 lb/hour**	**P27-077-FR-COMP**	**3/4/2020**

A. Emission Unit Description:			B. Pollutant
LM6000 Turbine			**O2**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
17.48 %	**N/A**	**P27-077-FR-COMP**	**3/4/2020**

A. Emission Unit Description:			B. Pollutant
LM6000 Turbine			**Heat Rate**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
443.00 MMbtu/hour	**N/A**	**P27-077-FR-COMP**	**3/4/2020**

A. Emission Unit Description:			B. Pollutant
LM6000 Turbine			**NH3**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
1.01 ppm @ 15% O2	**20 ppm @ 15% O2**	**P27-077-FR-COMP**	**3/4/2020**

A. Emission Unit Description:			B. Pollutant
LM6000 Turbine			**ROC**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
<0.39 ppm @ 3% O2	**2.0 ppm @ 3% O2**	**P27-077-FR-COMP**	**3/4/2020**

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION
SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: January 1, 2020- December 31, 2020

A. Emission Unit Description:			B. Pollutant
2X Predryer (70 Mmbtu/hour) and Yankee Hot Air Furnace (40 Mmbtu/hour)			
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
0.0705 lb/Mmbtu	**0.080 lb/Mmbtu**	**P27-076-FR2X**	**5/26/2020**

A. Emission Unit Description:			B. Pollutant
2X Predryer (70 Mmbtu/hour) and Yankee Hot Air Furnace (40 Mmbtu/hour)			**CO**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
0.0386 lb/Mmbtu	**0.045 lb/Mmbtu**	**P27-076-FR2X**	**5/26/2020**

A. Emission Unit Description:			B. Pollutant
2X Predryer (70 Mmbtu/hour) and Yankee Hot Air Furnace (40 Mmbtu/hour)			**O2**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
19.71 %	**N/A**	**P27-076-FR2X**	**5/26/2020**

Additional Documents in Support of Part 70 Compliance Certification for RY2020

Ventura County
Air Pollution
Control District

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

Certification by Responsible Official

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

Signature and Title of Responsible Official:	Date:
Signature: [signature]	2/10/2021
Title: Plant Manager	

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

February 10, 2021

Keith Macias
AQS, Inspector
Ventura County APCD
669 County Square Drive
Ventura, California 93003

Subject: Additional Documents in Support of Part 70 Compliance Certification for Report Year 2020

Mr. Macias:

Enclosed are additional documents in support of The Procter & Gamble Paper Products Company's Oxnard facility, Part 70 Permit No. 00015 Compliance Certification for the January 1, 2020 through December 31, 2020 reporting period. If you have any questions concerning these documents or would like supplemental information not included with this submission, please contact me at your earliest convenience.

I can be reached at 805-485-8871, X 2408 or stines.cg@pg.com should you have any questions about this certification.

Respectfully,

Cindy Stines
Site Environmental Systems Leader

Cc:
Mr. Marvelle Berry, Plant Manager; P&G
Mr. Sokny Field, HS&E Leader; P&G
Ms. Chris Cote, AQS; VCAPCD

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

February 10, 2021

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

Subject: Additional Documents in Support of Part 70 Compliance Certification for Report Year 2020

Mrs. Wood:

Enclosed are additional documents in support of The Procter & Gamble Paper Products Company's Oxnard facility, Part 70 Permit No. 00015 Compliance Certification for the January 1, 2020 through December 31, 2020 reporting period. If you have any questions concerning these documents or would like supplemental information not included with this submission, please contact me at your earliest convenience.

I can be reached at 805-485-8871, X2408 or stines.cg@pg.com should you have any questions about this certification.

Respectfully,

Cindy Stines
Site Environmental Leader

Cc:

Mr. Marvelle Berry, Plant Manager; P&G
Mr. Sokny Field, HS&E Leader; P&G
Ms. Chris Cote, AQS; VCAPCD

Semi-Annual Report
Permit to Operate No. 0015
Actual Annual Operating Hours for LM2500 and LM6000 Turbines

Report Period 1/1/2020 – 12/31/2020

P&G

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

February 10, 2021

Ed Swede
AQS Inspector
Ventura County APCD
669 County Square Drive
Ventura, California 93003

Subject: Semi Annual Report - Permit to Operate No. 0015
Actual Annual Operating Hours for LM2500 and LM6000 Turbines
Report Period: 01/01/20– 12/31/20

Mr. Swede:

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

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

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

If you have any questions, please contact me, at (805) 485-8871 x 2408 or stines.cg@pg.com

Respectfully,

Cindy Stines

cc: Mr. Marvelle Berry, P&G, Oxnard Plant Manager
Mrs. Sokny Field, P&G, HSE Leader
Mr. Eric Jenkins – P&G, SEL

Ventura County
Air Pollution
Control District

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

Certification by Responsible Official

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

Signature and Title of Responsible Official:	Date:
Signature: [signature]	2/10/2021
Title: Plant Manager	

REPORT #1 – LM-2500

Operating Hours and Source Test Results

SUMMARY REPORT

ANNUAL OPERATING HOURS AND SOURCE TEST RESULTS

Reporting Period Dates: From 01/01/20 through 12/31/20

Company: The Procter & Gamble Paper Products Company

Address:800 North Rice Avenue, Oxnard, CA 93030

Certification or Audit: May 19, 2020 (Annual Source Test)

Process Unit Description: LM-2500 Gas Turbine (Cogen I)

Total Source Operating

Time in Reporting Period: 4227.6

SOURCE TEST SUMMARY

Pollutant	Measured Emissions	Permit Limit
Oxides of Nitrogen, ppmvd @15% O_2	19.4	24
Carbon Monoxide, lb/hr	33.3	180.13

REPORT #2 – LM-6000

Operating Hours and Source Test Results

SUMMARY REPORT

ANNUAL OPERATING HOURS AND SOURCE TEST RESULTS

Reporting Period Dates: From 01/01/20 through 12/31/20

Company: The Procter & Gamble Paper Products Company

Address:800 North Rice Avenue, Oxnard, CA 93030

Certification or Audit: March 4, 2020 (Annual Source Test)

Process Unit Description: LM-6000 Gas Turbine (Cogen II)

Total Source Operating

Time in Reporting Period: 4057.68

SOURCE TEST SUMMARY

Pollutant	Measured Emissions	Permit Limit
Oxides of Nitrogen, ppmvd @15% O_2	2.25	2.5
Carbon Monoxide, lb/hr (expressed as CH4)	3.74	10.2
Reactive Organic Compounds, ppmvd @15%	< 0.39	2.0
Ammonia, ppmvd @ 15% O_2	1.01	20

Ventura County
Air Pollution
Control District

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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: [signature]	2/10/2021
Title: Plant Manager	

Semi-Annual Scrubber Report
Permit to Operate No. 0015
Excursion Report for 1X,
and 2X Paper Machine
Dry End Scrubbers

Report Period 7/1/2020 – 12/31/2020

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

February 10, 2021

Mr. Ed Swede
AQS, Inspector
Ventura County APCD
669 County Square Drive
Ventura, California 93003

Subject: Semi Annual Report - Permit to Operate No. 0015
Excursion Report for 1X, and 2X Paper Machine Dry End Scrubbers
Report Period: 7/1/20 – 12/31/20

Mr. Swede,

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

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

I can be reached at 805-485-8871 X 2408 or stines.cg@pg.com should you have any questions about this certification.

Respectfully,

Cindy Stines
Site Environmental System Leader

Cc:
Mr. Marvelle Berry, Plant Manager; P&G
Mr. Sokny Field, HS&E Leader; P&G
Ms. Chris Cote, AQS; VCAPCD

Ventura County
Air Pollution
Control District

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

Certification by Responsible Official

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

Signature and Title of Responsible Official:	Date:
Signature: [signature]	2/10/2021
Title: Plant Mangger	

Ventura County Air Pollution Control District
Part 70 - Semi Annual Scrubber Excursion Report

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

Report Period:	July 1, 2020 – December 31, 2020
Subject Units:	2 Dry End Scrubbers: 1X Paper Machine and 2X Paper Machine

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

Excursion Details –

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

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

EMERGENCY DIESEL ENGINE
2020 ANNUAL REPORT FORM

Reporting Period: January 1 through December 31, 2020

Due Date: See Notice to Supply Information (NTSI) Issued During Inspection

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

PERMIT NUMBER: 00015			
Facility Name:	Procter & Gamble Paper Products	Contact:	Cindy Stines
Facility Address:	800 North Rice Avenue	Title:	Environmental Systems Leader
Facility City:	Oxnard	Phone:	805-484-8871 X 2408

ENGINE DETAILS

Engine BHp Rating: 210 BHp

Engine Description (Manufacturer, Model, Serial Number, etc.):

Clarke Detroit Diesel Allison, Inc. Diesel-Fired Emergency Engine, Model JU6HUF50, Serial No. PE6068T157094, ID: Warehouse Pump #2, PG-2, (PG-5) used for fire suppression.

REPORTING REQUIREMENTS FOR CALENDAR YEAR 2020

	Date of Reading		Meter Reading
First of 2020:	1/2/2020	First of 2020:	414
End of 2020:	1/2/2021	End of 2020:	437.7
		Total annual hours for: Maintenance & Testing:	23.7
		Hours of Emergency use:	0
		Total Hours of operation:	23.7

Has the engine listed above exceeded the permit limit for maintenance and testing? NO
If yes, please explain here or **attach additional pages**:

Signature of person supplying the information: *"I certify that the above information is correct."*

Signature: Marvelle Berry	Date: 2/10/21
Print Name: Marvelle Berry	Title: Plant Manager
Phone #: 805-485-8871	Email: Berry.m@pg.com
SEND REPORT TO: Inspector Name: Ventura County Air Pollution Control District 669 County Square Drive, Second Floor Ventura, CA 93003 **or** FAX: 805/645-1444	For questions contact: Eric Wetherbee at (805) 645-1496, or erlc@vcapcd.org ☐ Entered in Engine Database

EMERGENCY DIESEL ENGINE
2020 ANNUAL REPORT FORM

Reporting Period: January 1 through December 31, 2020

Due Date: See Notice to Supply Information (NTSI) Issued During Inspection

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

PERMIT NUMBER: 00015

Facility Name:	Procter & Gamble Paper Products	Contact:	Cindy Stines
Facility Address:	800 North Rice Avenue	Title:	Environmental Systems Leader
Facility City:	Oxnard	Phone:	805-484-8871 X 2408

ENGINE DETAILS

Engine BHp Rating: 420 BHp

Engine Description (Manufacturer, Model, Serial Number, etc.):

Caterpillar Diesel-Fired Emergency Standby Engine, Model 3406, Serial No. 6TB10913, ID: Utility Yard Pump PG-3), used for fire suppression.

REPORTING REQUIREMENTS FOR CALENDAR YEAR 2020

	Date of Reading		Meter Reading
First of 2020:	1/2/2020	First of 2020:	815.5
End of 2020:	1/2/2021	End of 2020:	835.1
		Total annual hours for: Maintenance & Testing:	20
		Hours of Emergency use:	0.3
		Total Hours of operation:	19.7

Has the engine listed above exceeded the permit limit for maintenance and testing? NO

If yes, please explain here or **attach additional pages**:

Signature of person supplying the information: *"I certify that the above information is correct."*

Signature: Marvelle Berry	Date: 2/10/21
Print Name: Marvelle Berry	Title: Plant Manager
Phone #: 805-485-8871	Email: Berry.m@pg.com

SEND REPORT TO:
Inspector Name:
Ventura County Air Pollution Control District
669 County Square Drive, Second Floor
Ventura, CA 93003 **or** FAX: 805/645-1444

For questions contact:
Eric Wetherbee at (805) 645-1496, or
erlc@vcapcd.org

☐ Entered in Engine Database

EMERGENCY DIESEL ENGINE
2020 ANNUAL REPORT FORM

Reporting Period: January 1 through December 31, 2020

Due Date: See Notice to Supply Information (NTSI) Issued During Inspection

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

PERMIT NUMBER: 00015			
Facility Name:	Procter & Gamble Paper Products	Contact:	Cindy Stines
Facility Address:	800 North Rice Avenue	Title:	Environmental Systems Leader
Facility City:	Oxnard	Phone:	805-484-8871 X 2408

ENGINE DETAILS

Engine BHp Rating: 210 BHp

Engine Description (Manufacturer, Model, Serial Number, etc.):

Clarke Detroit Diesel Allison, Inc. Diesel-Fired Emergency Engine, Model JU6HUF50, Serial No. PE6068T185639, ID: Warehouse Pump #1, (PG-4), used for fire suppression.

REPORTING REQUIREMENTS FOR CALENDAR YEAR 2020

	Date of Reading		Meter Reading
First of 2020:	1/2/2020	First of 2020:	411.6
End of 2020:	1/2/2021	End of 2020:	436.3
		Total annual hours for: Maintenance & Testing:	24.7
		Hours of Emergency use:	0
		Total Hours of operation:	24.7

Has the engine listed above exceeded the permit limit for maintenance and testing? NO
If yes, please explain here or **attach additional pages**:

Signature of person supplying the information: *"I certify that the above information is correct."*

Signature: Marvelle Berry	Date: 2/10/20
Print Name: Marvelle Berry	Title: Plant Manager
Phone #: 805-485-8871	Email: Berry.m@pg.com
SEND REPORT TO: Inspector Name: Ventura County Air Pollution Control District 669 County Square Drive, Second Floor Ventura, CA 93003 **or** FAX: 805/645-1444	For questions contact: Eric Wetherbee at (805) 645-1496, or eric@vcapcd.org ☐ Entered in Engine Database

E. Wetherbee February 4, 2020

EMERGENCY DIESEL ENGINE
2020 ANNUAL REPORT FORM

Reporting Period: January 1 through December 31, 2020

Due Date: See Notice to Supply Information (NTSI) Issued During Inspection

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

PERMIT NUMBER: 00015			
Facility Name:	Procter & Gamble Paper Products	Contact:	Cindy Stines
Facility Address:	800 North Rice Avenue	Title:	Environmental Systems Leader
Facility City:	Oxnard	Phone:	805-484-8871 X 2408

ENGINE DETAILS

Engine BHp Rating: 210 BHp

Engine Description (Manufacturer, Model, Serial Number, etc.):

Clarke Detroit Diesel Allison, Inc. Diesel-Fired Emergency Engine, Model JU6HUF50, Serial No. PE6068T157094, ID: Warehouse Pump #2, PG-2, (PG-5) used for fire suppression.

REPORTING REQUIREMENTS FOR CALENDAR YEAR 2020

	Date of Reading		Meter Reading
First of 2020:	1/2/2020	First of 2020:	414
End of 2020:	1/2/2021	End of 2020:	437.7
		Total annual hours for: Maintenance & Testing:	23.7
		Hours of Emergency use:	0
		Total Hours of operation:	23.7

Has the engine listed above exceeded the permit limit for maintenance and testing? NO
If yes, please explain here or **attach additional pages**:

Signature of person supplying the information: *"I certify that the above information is correct."*

Signature: Marvelle Berry	Date: 2/10/21
Print Name: Marvelle Berry	Title: Plant Manager
Phone #: 805-485-8871	Email: Berry.m@pg.com
SEND REPORT TO: Inspector Name: Ventura County Air Pollution Control District 669 County Square Drive, Second Floor Ventura, CA 93003 **or** FAX: 805/645-1444	For questions contact: Eric Wetherbee at (805) 645-1496, or eric@vcapcd.org ☐ Entered in Engine Database

E. Wetherbee February 4, 2020

Opacity Annual Formal Survey
Procter & Gamble Oxnard Plant
VCAPCD Part 70 Permit, Attachment 50 Compliance Document

Conducted On Date 8/20/20 Time 13:10
Conducted By ERIC Daniels Signature Eric Daniels
Visible Emissions Certification #
Most Recent Certification Date 8/18/20

Permit Emission Points
Drawing - PG-3419820

Stack	Stack Hght (ft)	Stack Dia (sq ft)	Emissions Unit	Emission Description	Stack Position	Visible Emissions other than Uncombined Water N - if there are no visible emissions for≥ 3minutes Y- if there are visbible emissions > 20% or No. 1 Ringelmann for≥ 3minutes
S-1	62	2.10	Washer Wet Lapper	PM	When Fan motor on	N
S-2	84	12.67	Cogen 2/LM6000 Turbine	Thermal Output with NOx, CO, SOx, PM, ROC, NH3	Damper closed when 2X is running	N
S-3	27	4.40	B-301 Steam Boiler	Thermal Output with NOx, CO, SOx, PM, ROC	FGR closed during SU (1hr) only - 100% Exhaust - otherwise partial exhaust	N
Stack S-4 is not a physical stack but represents the totals stacks from 1X process stacks 4A-4E						
S-4A	56	4.72	1X PreDryer	Thermal Output with NOx, CO, SOx, PM, ROC HAF +Burners OR Cogen + Burners	Open when 1X running	N
S-4B	-	-	Furnace Cooling	Hot Air Release from shell cooling	Open	N
S-4C	-	-	HRB	Thermal Output, NOx, CO, SOx, PM, ROC	Normally Closed	N
S-4D	50	9.63	Cogen 1/LM2500 Turbine	Thermal Output, NOx, CO, SOx, PM, ROC	Damper closed when 1X running	N
S-4E	-	-	W/WL Broke Pulper vent	PM	Open vent	N
S-5	-	-	1X Scrubber	PM	When Fan motor on	N
S-6	-	-	2X Scrubber	PM	When Fan motor on	N
Stack S-7 is not physical stack but represents the totals stacks from 2X NOTE - PreDryer Exhaust is the emission from the YHAF (after drying)						
S-7A	74	12.22	2X PreDryer Exhaust (YHAF Stack)	Thermal Output with NOx, CO, SOx, PM, ROC, NH3 LM6000 + HAF +PD	Normally Open	N
S-7B	-	-	Exhaust Divertion (PDF Stack)	Thermal Output with NOx, CO, SOx, PM, ROC, NH3	Normally Closed	N
S-7C	-	-	2X Vacuum Stack	PM	Open Vent	N
S-7D	-	-	2X Wet End (Former)	PM	Open Vent	N
S-7E	-	-	2X Broke Pulper Vent	PM	Open Vent	N
2			Fire Pump #2	CARB Fuel Combustion	Open vent	N
3			Fire Pump #3	CARB Fuel Combustion	Open vent	N
4			Fire Pump #4	CARB Fuel Combustion	Open vent	N
5			Fire Pump #5	CARB Fuel Combustion	Open vent	N

Any Other Visible Emissions? Wind Calm, Clear Sky,

Permit Emission Points

Drawing - PG-3419820

Stack	Stack Hght (ft)	Stack Dia (sq ft)	Emissions Unit	Emission Description	Stack Position	Calculation
S-1	62	2.10	Washer Wet Lapper	PM	When Fan motor on	Permit - Fixed Operating Parameters
S-2	84	12.67	Cogen 2/LM6000 Turbine	Thermal Output with NOx, CO, SOx, PM ROC, NH3	Damper closed when 2X is running	CEMS
S-3	27	4.40	B-301 Steam Boiler	Thermal Output with NOx, CO, SOx, PM ROC	FGR closed during SU (1hr) only - 100% Exhaust - otherwise partial exhaust	Permit - Emission Factor for B-301
Stack S-4 is not a physical stack but represents the totals stacks from 1X process stacks 4A-4E						
S-4A	58	4.72	1X PreDryer	Thermal Output with NOx, CO, SOx, PM, ROC HAF + Burners OR Cogen + Burners	Open when 1X running	CEMS Permit - Emission Factors for HAF, Burners, and C1 SOx, PM, ROC
S-4B	-	-	Furnace Cooling	Hot Air Release from shell cooling	Open	Inclusive of C1 Emissions
S-4C	-	-	HRB	Thermal Output, NOx, CO, SOx, PM, ROC	Normally Closed	Inclusive of C1 Emissions
S-4D	50	9.63	Cogen 1/LM2500 Turbine	Thermal Output, NOx, CO, SOx, PM, ROC	Damper closed when 1X running	CEMS for NOx, CO Permit Emission factors SOx, PM, ROC
S-4E	-	-	W/W Broke Pulper vent	PM	Open vent	Calculation included in Turbine and Furnace emission factors for PM
S-5	-	-	1X Scrubber	PM	When Fan motor on	Permit - Fixed Operating Parameters
S-6	-	-	2X Scrubber	PM	When Fan motor on	Permit - Fixed Operating Parameters
Stack S-7 is not physical stack but represents the totals stacks from 2X NOTE - PreDryer Exhaust is the emission from the YHAF (after drying)						
S-7A	74	12.22	2X PreDryer Exhaust (YHAF Stack)	Thermal Output with NOx, CO, SOx, PM, ROC, NH3 LM6000 + HAF +PD	Normally Open	(PD + HAF) X Emission Factor + Cogen 2 Emissions
S-7B	-	-	Exhaust Diverter (PDF Stack)	Thermal Output with NOx, CO, SOx, PM ROC, NH3	Normally Closed	Inclusive of 2X emissions
S-7C	-	-	2X Vacuum Stack	PM	Open Vent	Calculation included in Turbine and Furnace emission factors for PM
S-7D	-	-	2X Wet End (Former)	PM	Open Vent	Calculation included in Turbine and Furnace emission factors for PM
S-7E	-	-	2X Broke Pulper Vent	PM	Open Vent	Calculation included in Turbine and Furnace emission factors for PM
Fire Pumps						
			Fire Pump #2	CARB Fuel Combustion	Open vent	Report allocated fuel usage
			Fire Pump #3	CARB Fuel Combustion	Open vent	Report allocated fuel usage
			Fire Pump #4	CARB Fuel Combustion	Open vent	Report allocated fuel usage
			Fire Pump #5	CARB Fuel Combustion	Open vent	Report allocated fuel usage
ROC Emissions						
			Parts Cleaner - Pmtkng		ROC	Insignificant Activity
			Parts Cleaner - Cvtg		ROC	Insignificant Activity
			Parts Cleaner - Truck Shop		ROC	Insignificant Activity
			Ink Room		ROC	Calcualte from chemical usage/ Graphic Arts VOC file
			Manufacturing Additatives		ROC	Calculated from chemical usage

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

	B301
Fuel	
Usage	(MMSCF)
Jan-20	8.15
Feb-20	11.17
Mar-20	11.98
Apr-20	4.60
May-20	7.38
Jun-20	4.61
Jul-20	3.51
Aug-20	1.40
Sep-20	4.21
Oct-20	2.13
Nov-20	2.77
Dec-20	3.90
12 Month Total	**65.81**

Annual Heat Input (AHI):

Higher Heating Value 1,050 BTU/scf
1,050 MMBTU/MMSCF

AHI = Fuel Used in 12 Months (MMscf) * Higher Heating Value (MMBTU/MMscf)

AHI = 65.81 * 1050

AHI = 69,101 MMBTU

Maximum Potential Heat Input (MPHI)

Rated Firing Capacity (RFC) 100 MMBTU/hr

Maximum Potential Operating Hours (MPOH): 8,784 hrs

MPHI = RFC * MPOH

MPHI = 878,400 MMBTU

of MPHI (Maximum Allowable) 30% 263,520 MMBTU

Maximum Allowable Rolling 12 month Fuel Usage 250.97 MMSCF

Capacity Factor (CF)

ity Factor: Ratio of Annual Actual Heat Input to Maximum Potential Heat Input

CF = AHI / MPHI

CF = 0.07867 Ratio

% CF = 7.9% (%CF)

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

	B301
Fuel	
Usage	(MMSCF)
Jan-20	8.15
Feb-20	11.17
Mar-20	11.98
Apr-20	4.60
May-20	7.38
Jun-20	4.61
Jul-20	3.51
Aug-20	1.40
Sep-20	4.21
Oct-20	2.13
Nov-20	2.77
Dec-20	3.90
12 Month Total	**65.81**

Annual Heat Input (AHI):

:Higher Heating Value 1,050 BTU/scf
1,050 MMBTU/MMSCF

AHI = Fuel Used in 12 Months (MMscf) * Higher Heating Value (MMBTU/MMscf)

AHI = 65.81 * 1050

AHI = 69,101 MMBTU

Maximum Potential Heat Input (MPHI)

:Rated Firing Capacity (RFC) 100 MMBTU/hr

Maximum Potential Operating Hours (MPOH): 8,784 hrs

MPHI = RFC * MPOH

MPHI = 878,400 MMBTU

:of MPHI (Maximum Allowable) 30% 263,520 MMBTU

:Maximum Allowable Rolling 12 month Fuel Usage 250.97 MMSCF

Capacity Factor (CF)

ity Factor: Ratio of Annual Actual Heat Input to Maximum Potential Heat Input

CF = AHI / MPHI

CF = 0.07867 Ratio

% CF = **7.9%** (%CF)

PO00015PC1.1 RY 2020 Monthly Throughput

	PMKG	CVTG	Total Facility	Combustion Emissions					
Month	ROC	ROC	ROC	ROC	NOx	PM	SOx	CO	NH3
	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)	(tons)
Jan-20	2.20	0.33	3.75	1.22	9.07	1.51	0.15	11.94	0.32
Feb-20	2.22	0.46	3.69	1.01	9.33	1.26	0.13	14.02	0.31
Mar-20	2.28	0.39	3.59	0.92	9.65	1.15	0.12	10.97	0.31
Apr-20	2.22	0.52	3.81	1.07	7.93	1.33	0.14	9.66	0.31
May-20	2.15	0.38	3.53	1.00	8.50	1.24	0.12	9.96	0.38
Jun-20	2.18	0.56	3.92	1.18	8.78	1.47	0.14	13.02	0.38
Jul-20	2.20	0.45	3.89	1.23	10.27	1.54	0.15	11.03	0.35
Aug-20	2.34	0.23	3.82	1.25	9.03	1.54	0.15	9.96	0.29
Sep-20	2.29	0.34	3.80	1.18	8.67	1.45	0.14	9.36	0.28
Oct-20	2.14	0.34	3.71	1.22	8.97	1.51	0.14	11.98	0.39
Nov-20	2.17	0.23	3.55	1.15	8.47	1.44	0.13	12.02	0.60
Dec-20	2.37	0.23	3.82	1.22	9.08	1.53	0.14	18.28	0.50
				Current Actual in Tons versus ***Permit Limit***					
12 Mo Tons	**26.77**	**4.46**	**44.88**	**13.65**	**107.75**	**16.96**	**1.66**	**142.18**	**4.43**
				ROC	NOx	PM	SOx	CO	NH3
			Permit Limits ->	**16.82**	**132.88**	**68.3**	**2.03**	**284.93**	**54.19**

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: January 1, 2020- December 31, 2020

A. Emission Unit Description:			B. Pollutant
B-301 Boiler			**NOx**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
23.50 ppm @3% O2	**40 ppm @ 3% O2**	**P27-076-FR B301**	**3/2/2020**

A. Emission Unit Description:			B. Pollutant
B-301 Boiler			**CO**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
793.00 ppm @ 3% O2	**400 ppm @ 3% O2**	**P27-076-FR B301**	**3/2/2020**

A. Emission Unit Description:			B. Pollutant
B-301 Boiler			**NOx**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
28.80 ppm @3% O2	**40 ppm @ 3% O2**	**P27-076-FR B301**	**3/3/2020**

A. Emission Unit Description:			B. Pollutant
B-301 Boiler			**CO**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
201.00 ppm @ 3% O2	**400 ppm @ 3% O2**	**P27-076-FR B301**	**3/3/2020**

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: January 1, 2020- December 31, 2020

A. Emission Unit Description:			B. Pollutant
LM6000 Turbine			**NOx**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
2.25 ppm @ 15% O2	**2.5 ppm @ 15% O2**	**P27-077-FR-COMP**	**3/4/2020**

A. Emission Unit Description:			B. Pollutant
LM6000 Turbine			**CO**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
3.74 lb/hour	**10.20 lb/hour**	**P27-077-FR-COMP**	**3/4/2020**

A. Emission Unit Description:			B. Pollutant
LM6000 Turbine			**O2**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
17.48 %	**N/A**	**P27-077-FR-COMP**	**3/4/2020**

A. Emission Unit Description:			B. Pollutant
LM6000 Turbine			**Heat Rate**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
443.00 MMbtu/hour	**N/A**	**P27-077-FR-COMP**	**3/4/2020**

A. Emission Unit Description:			B. Pollutant
LM6000 Turbine			**NH3**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
1.01 ppm @ 15% O2	**20 ppm @ 15% O2**	**P27-077-FR-COMP**	**3/4/2020**

A. Emission Unit Description:			B. Pollutant
LM6000 Turbine			**ROC**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
<0.39 ppm @ 3% O2	**2.0 ppm @ 3% O2**	**P27-077-FR-COMP**	**3/4/2020**

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: January 1, 2020- December 31, 2020

A. Emission Unit Description:			B. Pollutant
LM2500 Turbine			**NOx**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
19.40 ppm @ 15% O2	**24 ppm @ 15% O2**	**P27-077-FR COMP-C1**	**5/19/2020**

A. Emission Unit Description:			B. Pollutant
LM2500Turbine			**CO**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
33.30 lb/hour	**180.13 lb/hour**	**P27-077-FR COMP-C1**	**5/19/2020**

A. Emission Unit Description:			B. Pollutant
LM2500 Turbine			**O2**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
14.30 %	**N/A**	**P27-077-FR COMP-C1**	**5/19/2020**

A. Emission Unit Description:			B. Pollutant
LM2500 Turbine			**Heat Rate**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
243.00 MMbtu/hour	**N/A**	**P27-077-FR COMP-C1**	**5/19/2020**

Ventura County Air Pollution Control District

ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: January 1, 2020- December 31, 2020

A. Emission Unit Description:			B. Pollutant
2X Predryer (70 Mmbtu/hour) and Yankee Hot Air Furnace (40 Mmbtu/hour)			
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
0.0705 lb/Mmbtu	**0.080 lb/Mmbtu**	**P27-076-FR2X**	**5/26/2020**

A. Emission Unit Description:			B. Pollutant
2X Predryer (70 Mmbtu/hour) and Yankee Hot Air Furnace (40 Mmbtu/hour)			**CO**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
0.0386 lb/Mmbtu	**0.045 lb/Mmbtu**	**P27-076-FR2X**	**5/26/2020**

A. Emission Unit Description:			B. Pollutant
2X Predryer (70 Mmbtu/hour) and Yankee Hot Air Furnace (40 Mmbtu/hour)			**O2**
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test:	F. Test Date
19.71 %	**N/A**	**P27-076-FR2X**	**5/26/2020**