OFFICIAL DAILY COGENERATION LOG

NEW-INDY CONTAINERBOARD
OXNARD MILL

DATE: 2-20-21

DAY SHIFT OPERATOR — NAME: RoB

NIGHT SHIFT OPERATOR — NAME: MH

STEAM & WATER READINGS / GAS & ELECTRIC READINGS

	PERMEATE H2O	CONCENTRATE H O2	LP	HP	SCG LP	TURBINE	MAXON	DUCT BURNER	MEGAWATTS
ENT	6379258	1748988	232374	1981	080620	8926640	2428082	332714	38396
PREVIOUS	6370574	1744502	233321	2075	080970	858410	4856922	540235	37830

(Above Megawatts, handwritten and struck through: 383 3406)

NEW DEMIN TRAILER YES ☐ NO ☑ | TANK 1 % | TANK 2 % | CHILLER HOURS:

AMMONIA DELIVERY YES ☐ NO ☑ | % FULL: | PACESETTER ON / OFF | ALARM: RED ☐ YELLOW ☐ GREEN ☐

TURBINE

		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00
FMV	%	71	70	70	71	71	69	70.9	72	70.8	72.1	71	70
Inlet Temp	°F	50	58	65	69	64	61	58	58	58	58	58	57
Humidity	%	59	51	31	18	38	50	53.3	39.9	30.2	34.4	32	31
Vibration (Max)	MILS	26	29	26	32	21	29	.22	.21	.26	.28	.28	.27
Steam Injection	#/SEC	1.8	1.8	1.9	1.9	1.9	1.8	1.94	1.94	1.94	1.94	1.94	1.88
Turbine L.O. Level	%	99	99	99	99	99	99	99	99	99	99	99	99
T54	°F	1389	1407	1427	1440	1430	1415	1409	1412	1406	1412	1411	1411

Day			Night		
BATTERIES V	HP RECOUPE FAL		BATTERIES V	HP RECOUPE FAL	
AIR INLET DIFF IN/H2O	HP RECOUPE FAR		AIR INLET DIFF IN/H2O	HP RECOUPE FAR	
L.O. DIFFERENTIAL PSI	HP RECOUPE AFT		L.O. DIFFERENTIAL PSI	HP RECOUPE AFT	
CRANK WASH YES ☐ NO ☑ >	GALLONS	CONDUCTIVITY MHOS	BOILER FEED WATER PUMP OPERATION	NO.1 PUMP YES ☑ NO ☐	NO.2 PUMP YES ☐ NO ☐

ONLINE TURBINE WATER WASH YES ☐ NO ☑

GENERATOR

		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00
Gen. Bearing Drain	°F	147	149	150	151	152	151	150	149	149	148	149	149
L.O. Supply	°F	117	119	120	121	122	121	121	120	120	119	119	118
Gen. Vibration (Max)	IPS	26	25	27	28	30	29	.29	.31	.30	.36	.30	.30
Tie Line	MW	10.1	10	10	10	9.9	9.9	9.95	9.95	10.03	10.03	10.05	9.85
Generator Voltage	KV												

Day		Night	
GEN. AMPS	GEN.VARS MEGA VARS	GEN. 1077 AMPS	GEN.VARS 1.70 MEGA VARS
FIELD AMPS	FIELD VOLTS V	FIELD 178.2 AMPS	FIELD VOLTS 145.8
COOLING TWR INLET F	COOLING TWR OUTLET F	COOLING TWR INLET 85 F	COOLING TWR OUTLET 79 F

COGEN BOILER

		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00
450 Header Temp	°F	718	718	718	718	718	718	717	717	718	718	718	718
HP Drum Level	IN	1.5	1.6	1.3	1.9	1.7	.8	1.6	1.4	1.3	1.5	1.6	1.5
LP Drum Level	IN	.9	1	1.1	1.1	.7	1.1	1.4	.9	1.1	.9	1.0	1.2
HP Drum Pressure	PSI	488	488	481	474	488	467	481	488	481	481	481	481
LP Drum Pressure	PSI	155	153	153	151	153	137	155	153	153	153	153	153
CO	PPM	20.2	19.6	|	15.8	|	|	CAL	17.4	16.9	15.6	15	14.4
NOx	PPM	10.5	10.1	|	12.4	|	|	↓	10.7	10.1	10.7	10.8	10.4
O2	%	14.4	14.5		19.7				14.39	14.30	14.22	14.22	14.22
Hot Well Level	%	143	160	154	152	140	145	139	159	145	161	136	140
		8:00	10:00	12:00	14:00	16:00	18:00	20:00	22:00	24:00	2:00	4:00	6:00
450 Header Temp	°F	718	718	718	718	718	718	718	717	718	718	718	719
HP Drum Level	IN	1.8	1.7	1.5	1.6	1.1	1.6	1.2	1.3	1.4	1.7	1.8	1.8
LP Drum Level	IN	1	.8	.9	.6	.7	1.6	1.2	.9	.9	.8	1.2	.8
HP Drum Pressure	PSI	488	481	481	488	481	488	467	481	481	481	481	481
LP Drum Pressure	PSI	155	153	153	153	157	155	139	153	153	153	153	153
CO	PPM	20.5	|	—	|	—	|	20.3	16.6	16.4	15.8	14.7	15.5
NOx	PPM	10.1	|	9.1	|	7.2	|	11	10.7	10.6	10.2	10.9	10.5
O2	%	14.5		—		—		15.00	14.31	17.23	14.37	14.35	14.26
Hot Well Level	%	147	140	141	136	156	145	141	152	156	147	142	157

AUTO / ON / OFF

Day		Night	
1150 SET POINT	1103 B SET POINT	1150 SET POINT 451	1103 B SET POINT 447
DUCT BURNER	S/P	DUCT BURNER	S.P. 444

COMPRESSORS

		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00
Filter Separator	PSI	222	226	224	226	226	226	224	224	226	226	230	230
Gas Receiver	PSI	420	420	420	420	421	420	420	420	420	421	421	421

Day	Night
Crankcase Oil Level %	Crankcase Oil Level % 100
Frame Oil Pressure (25–50) PSI	Frame Oil Pressure (25–50) PSI 23.78
Temp. cooling °F T1 T2	Temp. cooling °F T1 T2 59

BOILER TEST RESULTS

	DAY SHIFT	NIGHT SHIFT
BOILER FEEDWATER		
pH 8.75– 9.5		8.8
Conductivity <5mmhos		6.6
Silica <20 ppb		
R.O.		
Feed TDS<1000 ppm		
Permeate TDS<10 ppm		
pH (Feed 7.5)		7.8
CONDENSATE		
HP–pH 8.5 –9.5		
Conductivity <20mmhos		
LP–pH 8.5–9.5		
Conductivity <20mmhos		
HP		
pH 9.5 – 10.5		9.6
Conductivity 75–150		112
Phosphate 5–15 ppm		
Silica <5 ppm		
Iron ppm		
LP		*
pH 9.5 – 10.5		9.9
Conductivity 75 – 150		119
Phosphate 5–15 ppm		
Silica <5 ppm		
Iron ppm		
MIXED BED		
pH 6.0 – 7.5		6.2
Conductivity <1mmhos		.39
Silica <10 ppb		
HP Steam Test		
Silica <20 ppb		PH 8.0
SOFTENER		
Hardness <1.0 ppm		
Running (1 or 2)		1
STEAM TEST		
Silica <20 ppb		
PV NO.2		
HP BLOW DOWN	DAY SHIFT:	
TIME:		
	NORTH TANK	SOUTH TANK
SALT	FEET	FEET

(Written across Day Shift column: EMISSION ISSUES)

NOTES: ROSEMOUNT ALARM @ 10:15
James & ANDY C. Have Been Working
On it Since then!
A Sump temp Bouncing all over!

ACAD# 000-3011 – REV.J.4

End Time 2/22/2021 7:00 Start Time 2/21/2021 7:00

DAILY ENVIRONMENTAL REPORT

Time	Duct burner gas flow MSCFH	Turbine gas flow MSCFH	Mixon Burner gas flow MMBTU/hr	Mixon Burner gas flow SCFH	SCR Temperature °F	SCR Inlet NOx ppm	Ammonia Usage lb/h	NH3:NOx mole ratio	Injection steam rate lb/s	Steam to fuel ratio lb/lb	NOx lb/h	Stack O2 %	Stack CO 15% O2 ppm	CO lb/h	Stack NOx 15% O2 ppm	3h Running Average NOx	Nebraska O2 %	Nebraska NOx ppm	Nebraska Corrected NOx (ppm) (3% O_2)
8:00	12.84	250.47	2.41	2317.21	695.18	80.45	26.18	0.89	1.91	0.63	**10.61**	14.27	14.22	**8.70**	**10.58**	**10.54**	20.79	0.00	0.00
9:00	12.46	248.93	2.27	2184.12	695.59	83.96	27.59	0.90	1.91	0.63	**10.56**	14.26	13.32	**8.06**	**10.61**	**10.57**	20.78	0.00	0.00
10:00	11.04	250.64	2.16	2083.26	695.51	85.56	28.58	0.90	1.91	0.63	**10.53**	14.27	12.64	**7.68**	**10.55**	**10.58**	20.79	0.00	0.00
11:00	12.33	249.23	1.68	1590.11	694.90	153.75	20.17	0.11	1.91	0.63	[illegible]	[illegible]	-126.14	**-75.99**	[illegible]	[illegible]	20.75	0.00	0.00
12:00	12.59	250.18	1.19	1170.53	695.26	131.04	20.12	-0.22	1.91	0.63	[illegible]	[illegible]	-120.44	**-52.45**	[illegible]	[illegible]	20.74	0.00	0.00
13:00	10.77	252.34	2.11	2035.57	693.90	80.45	35.00	1.06	1.96	0.63	**8.89**	14.83	18.68	**11.82**	**9.30**	[illegible]	20.64	0.00	0.00
14:00	8.72	255.13	2.86	2754.81	689.05	76.71	31.97	1.10	1.96	0.64	**8.37**	14.86	18.34	**11.16**	**8.45**	[illegible]	20.61	0.00	0.00
15:00	11.85	255.08	2.87	2758.47	694.01	76.06	27.11	0.95	1.97	0.64	**10.66**	14.72	18.42	**11.37**	**10.49**	**9.41**	20.61	0.00	0.00
16:00	13.44	255.37	2.85	2746.41	695.76	76.09	27.38	0.94	1.97	0.64	**10.81**	14.68	18.30	**11.41**	**10.55**	**9.83**	20.63	0.00	0.00
17:00	14.22	252.40	2.96	2857.62	695.60	70.50	24.55	0.93	1.97	0.64	**10.43**	14.68	19.06	**11.77**	**10.28**	**10.44**	20.55	0.00	0.00
18:00	15.68	251.96	3.02	2904.55	695.98	67.96	23.24	0.90	1.96	0.64	**10.68**	14.65	20.21	**12.51**	**10.46**	**10.43**	20.51	0.00	0.00
19:00	15.08	252.57	3.22	3108.89	695.71	68.93	23.63	0.91	1.96	0.64	**10.78**	14.68	20.34	**12.88**	**10.57**	**10.44**	20.51	0.00	0.00
20:00	17.14	251.95	3.27	3134.66	699.21	70.02	24.40	0.92	1.96	0.63	**10.83**	14.64	19.51	**12.20**	**10.58**	**10.54**	20.52	0.00	0.00
21:00	16.48	254.23	3.16	3041.66	700.73	70.09	24.59	0.91	1.97	0.64	**10.78**	14.65	19.71	**12.38**	**10.44**	**10.53**	20.49	0.00	0.00
22:00	8.85	252.35	3.36	3229.57	685.50	67.02	22.29	0.89	1.97	0.63	**10.29**	14.81	20.56	**12.43**	**10.33**	**10.45**	20.45	0.00	0.00
23:00	8.95	250.98	3.28	3153.65	680.96	66.56	21.80	0.89	1.93	0.63	**10.37**	14.84	20.55	**12.34**	**10.48**	**10.42**	20.46	0.00	0.00
0:00	7.77	251.32	1.69	1624.88	680.80	67.41	22.04	0.90	1.94	0.63	**10.37**	14.87	20.78	**12.41**	**10.51**	**10.44**	20.47	0.00	0.00
1:00	7.10	250.82	3.14	3020.34	679.41	70.41	23.32	0.91	1.93	0.63	**10.42**	14.87	19.88	**11.86**	**10.60**	**10.53**	20.52	0.00	0.00
2:00	7.42	250.83	2.93	2821.71	678.55	73.32	24.71	0.94	1.92	0.63	**10.42**	14.88	19.54	**11.65**	**10.61**	**10.57**	20.66	0.00	0.00
3:00	6.97	249.82	2.71	2608.30	680.07	77.82	26.65	0.95	1.91	0.63	**10.38**	14.88	17.89	**10.70**	**10.61**	**10.61**	20.65	0.00	0.00
4:00	6.84	249.40	2.57	2479.68	680.10	78.65	27.10	0.96	1.91	0.63	**10.28**	14.88	17.48	**10.40**	**10.53**	**10.58**	20.70	0.00	0.00
5:00	6.85	246.71	1.78	1687.05	679.89	78.10	26.78	0.96	1.90	0.63	**10.17**	14.89	17.53	**10.33**	**10.53**	**10.58**	20.75	0.00	0.00
6:00	7.34	246.37	1.82	1776.26	682.67	78.27	26.85	0.96	1.91	0.63	**10.17**	14.88	17.60	**10.33**	**10.52**	**10.53**	20.72	0.00	0.00
7:00	6.68	247.22	2.37	2282.67	680.34	80.09	27.43	0.95	1.91	0.63	**10.20**	14.86	16.68	**9.85**	**10.56**	**10.54**	20.75	0.00	0.00

Daily Av Cogen	Daily Av Cog+Neb
NOx	NOx
lb/h	lb/h
10.23	10.23

Daily Av Cogen	Daily Av Cog+Neb
CO	CO
lb/h	lb/h
11.09	11.09

Stack NOx analyzer	
zero value	-0.16
zero drift %	-0.16
span value	82.22
span drift %	0.34

Stack CO Analyzer	
zero value	-2.56
zero drift %	-2.56
span value	91.03
span drift %	-0.09

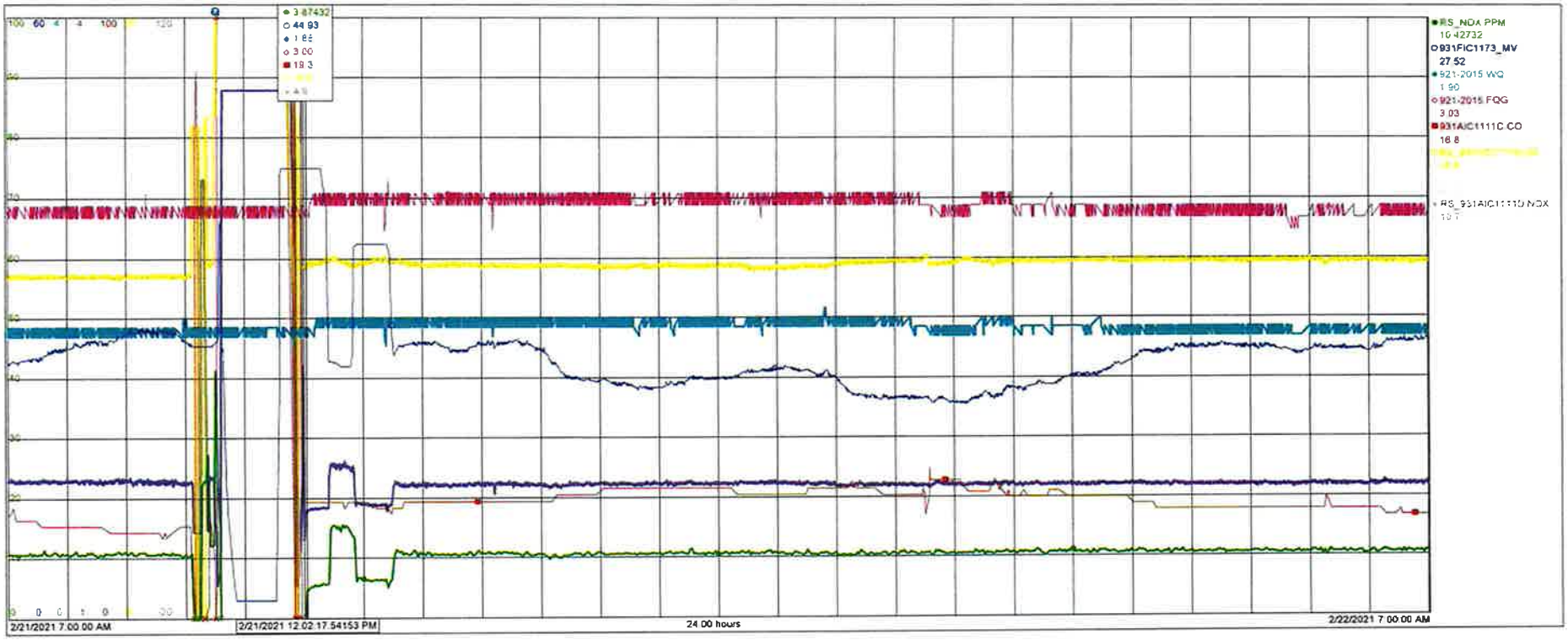
Stack O2 Analyzer	
span value	20.88
span drift %	-0.20
zero value	-0.56
zero drift %	-0.56

Nebraska Gas	
	0

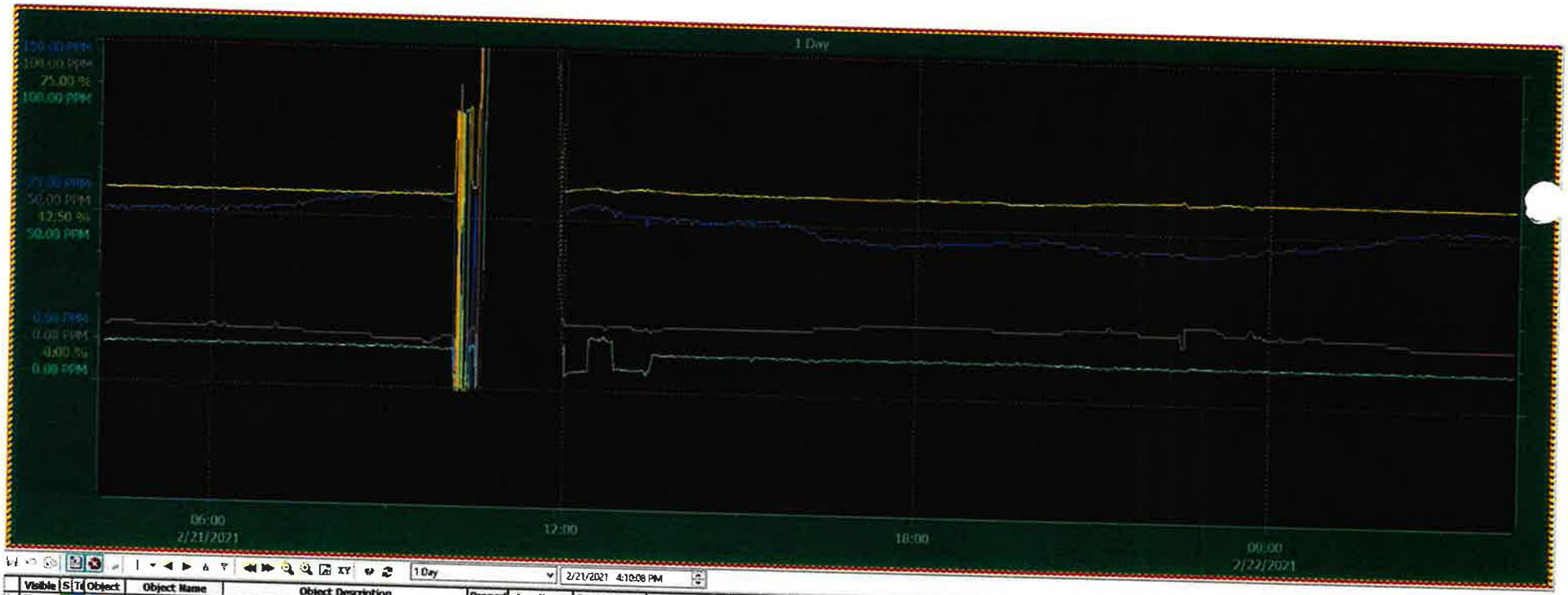
Comments: CEMS malfunction was on 2/21/21 from 7:00 AM to 12:02 PM, a total of 5.03 hours. VCAPCD was notified on 2/20/21 at 11:16 AM.

PRINT TIME: 2/23/2021 11:25 AM

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


3.87432
44.93
1.85
3.00
18.3
RS_NOx PPM
10.42732
931FIC1173_MV
27.52
921-2015 WQ
1.90
921-2015 FQG
3.03
931AIC1111C.CO
18.8
RS_931AIC1111D.NOX
2/21/2021 7:00:00 AM
2/21/2021 12:02:17.54153 PM
24.00 hours
2/22/2021 7:00:00 AM

Root/Oxnard Mill/S Area: T-921-020-02



1 Day | 2/21/2021 4:10:08 PM

	Visible	S	T	Object	Object Name	Object Description	Propert	Log Name	Current Value	Low Range	High Range	Ruler Time	Ruler Value	Mean Value	Min Value	Max Value	Property Descri
1	☑				931AIC1111A.NOX	B&W SCR INLET NOX	VALUE	SEAMLESS	75.94 PPM	0.00 PPM	150.00 PPM	2/21/2021 3:52:39	77.67 PPM	77.62 PPM	0.98 PPM	153.75 PPM	VALUE
2	☑				931AIC1111C.CO	B&W BLR STACK RAW CO	VALUE	SEAMLESS	18.66 PPM	0.00 PPM	100.00 PPM	2/21/2021 3:52:39	16.47 PPM	23.37 PPM	-2.56 PPM	102.75 PPM	VALUE
3	☑				931AIC1111B.O2	B&W BLR RAW O2%	VALUE	SEAMLESS	14.93 %	0.00 %	25.00 %	2/21/2021 3:52:39	14.20 %	15.20 %	-0.49 %	25.71 %	VALUE
4	☑				931AIC1111D.NOX	B&W BLR STACK NOX	VALUE	SEAMLESS	10.81 PPM	0.00 PPM	100.00 PPM	2/21/2021 3:52:39	11.85 PPM	15.90 PPM	-0.12 PPM	102.97 PPM	VALUE
5	☐				931-AIC-1111.INCAL	RSMT CEMS IN CAL	VALUE	SEAMLESS	0.00	0	1			0	0	1	VALUE
6	☐				931-aic-1111.trb	RSMT CEMS TROUBLE	VALUE	SEAMLESS	1.00	0	1			1	0	1	VALUE
7	☐																
8	☐																

2/22/2021 8:59:23 AM

OFFICIAL DAILY COGENERATION LOG

NEW-INDY CONTAINERBOARD
OXNARD MILL

DATE: 2-21-21

DAY SHIFT OPERATOR — NAME: Rob

NIGHT SHIFT OPERATOR — NAME: MH

STEAM & WATER READINGS / GAS & ELECTRIC READINGS

	PERMEATE H2O	CONCENTRATE H2O	LP	HP	SCG LP	TURBINE	MAXON	DUCT BURNER	MEGAWATTS
CURRENT	6388298	1753269	230730	1963	0837970	9263010	9849675	258903	38970
PREVIOUS	6379258	1748958	232374	1981	0820620	8926640	2428082	332714	38390

NEW DEMIN TRAILER YES ☐ NO ☑ TANK 1 % TANK 2 %

AMMONIA DELIVERY YES ☐ NO ☑ % FULL:

CHILLER HOURS:

PACESETTER ON / OFF ALARM: RED ☐ YELLOW ☐ GREEN ☐

TURBINE

		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00
FMV	%	71	72	71	73	73	72	72.8	73.1	71.1	71.5	70.6	68.8
Inlet Temp	°F	63	69	64	64	63	60	58	57	57	57	64	63
Humidity	%	27	17	12	16	21	38	41.6	40.9	49.3	34.9	17.2	15.2
Vibration (Max)	MILS	27	23	29	19	20	19	.19	.18	.24	.19	.29	.34
Steam Injection	#/SEC	1.9	1.9	1.9	2	2	1.9	2.00	2.00	1.94	1.94	1.94	1.88
Turbine L.O. Level	%	90	90	100	100	100	100	100	100	100	100	100	100
T54	°F	1424	1440	1421	1427	1426	1420	1417	1415	1403	1412	1420	1413

Day: BATTERIES V / HP RECOUPE FAL; AIR INLET DIFF IN/H2O / HP RECOUPE FAR; L.O. DIFFERENTIAL PSI / HP RECOUPE AFT

Night: BATTERIES 12.7 V / HP RECOUPE FAL; AIR INLET DIFF 2.2 IN/H2O / HP RECOUPE FAR; L.O. DIFFERENTIAL 6 PSI / HP RECOUPE AFT

ONLINE TURBINE WATER WASH YES ☐ NO ☑ — CRANK WASH YES ☐ NO ☑ — GALLONS — CONDUCTIVITY MHOS

BOILER FEED WATER PUMP OPERATION: NO.1 PUMP YES ☑ NO ☐ — NO.2 PUMP YES ☐ NO ☐

GENERATOR

		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00
Gen. Bearing Drain	°F	149	151	151	152	152	151	153	152	151	150	150	149
L.O. Supply	°F	118	120	120	121	122	122	124	123	122	121	120	119
Gen. Vibration (Max)	IPS	30	30	31	31	32	32	.31	.30	.30	.29	.30	.30
Tie Line	MW	10	10	9.9	9.9	9.8	10	9.89	10.09	9.94	9.94	10.06	9.97
Generator Voltage	KV												

Day: GEN. AMPS / GEN.VARS MEGA VARS; FIELD AMPS / FIELD VOLTS V; COOLING TWR INLET °F / COOLING TWR OUTLET °F

Night: GEN. 1085 AMPS / GEN.VARS 1.83 MEGA VARS; FIELD 180 AMPS / FIELD VOLTS 147.9 V; COOLING TWR INLET 86 °F / COOLING TWR OUTLET 80 °F

COGEN BOILER

		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00
450 Header Temp	°F	718	718	718	718	718	719	718	718	718	718	718	719
HP Drum Level	IN	1.6	1.4	1.5	1.3	1.9	1.3	1.5	1.7	2.0	1.5	1.3	4.7
LP Drum Level	IN	1.1	1.1	.8	.3	1	1	.9	1.3	1.0	.9	1.1	1.1
HP Drum Pressure	PSI	481	481	481	481	481	481	481	488	481	474	481	481
LP Drum Pressure	PSI	153	153	157	155	155	155	155	154	152	151	151	155
CO	PPM	14.4	12.7		19	18	20.2	20.3	20.6	21.6	20.8	17.5	17.4
NOx	PPM	10.4	10.9		6.3	10.2	10.9	10.7	10.4	10.6	10.9	10.5	10.4
O2	%	14.2	14.3		14.9	14.7	14.5	14.67	14.77	14.82	14.95	14.90	14.99
Hot Well Level	%	143	150	141	136	152	145	147	157	139	154	157	138

		8:00	10:00	12:00	14:00	16:00	18:00	20:00	22:00	24:00	2:00	4:00	6:00
450 Header Temp	°F	718	718	718	718	719	718	719	718	718	718	718	718
HP Drum Level	IN	1.5	1.3	1.3	1.5	1.5	1.6	.9	1.5	2.4	1.4	1.3	.9
LP Drum Level	IN	.9	1.1	.3	1.5	.9	1.1	1.0	1.1	1.1	1.1	1.1	.9
HP Drum Pressure	PSI	485	481	481	488	481	481	481	481	481	474	481	481
LP Drum Pressure	PSI	153	153	155	155	155	155	153	152	151	151	151	151
CO	PPM	13.4	12.7	19	18.2	18.5	20.5	18.9	19.5	19.8	18.7	17.3	17.5
NOx	PPM	10.8	9.5	6.4	10.2	10.2	10.5	10.3	10.4	10.6	11.1	10.7	10.6
O2	%	14.2	14.2	14.8	14.7	14.7	14.7	14.52	14.78	14.88	14.95	14.90	14.83
Hot Well Level	%	159	147	138	156	150	148	161	150	159	152	150	161

Day: 1150 SET POINT — 1103 B SET POINT — DUCT BURNER S/P

Night: 1150 SET POINT 451 — 1103 B SET POINT 447 — DUCT BURNER S.P. 444

AUTO / ON / OFF

COMPRESSORS

		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00
Filter Separator	PSI	230	230	230	232	230	230	228	228	230	230	232	232
Gas Receiver	PSI	420	420	420	420	420	420	420	420	420	421	421	421

Day: Crankcase Oil Level % — Frame Oil Pressure (25-50) PSI — Temp. cooling °F T1 T2

Night: Crankcase Oil Level % 100 — Frame Oil Pressure (25-50) PSI 23.70 — Temp. cooling °F T1 T2 56

BOILER TEST RESULTS

	DAY SHIFT	NIGHT SHIFT
BOILER FEEDWATER		
pH 8.75– 9.5	8.4	8.6
Conductivity <5mmhos	7.3	6.9
Silica <20 ppb		
R.O.		
Feed TDS<1000 ppm		
Permeate TDS<10 ppm		
pH (Feed 7.5)	7.1	7.3
CONDENSATE		
HP-pH 8.5 –9.5	8.5	
Conductivity <20mmhos	5.2	
LP-pH 8.5–9.5	9.2	
Conductivity <20mmhos	15	
HP		
pH 9.5 – 10.5	9	9.3
Conductivity 75–150	134	136
Phosphate 5–15 ppm		
Silica <5 ppm		
Iron ppm		
LP		
pH 9.5 – 10.5	9.2	9.1
Conductivity 75 – 150	115	118
Phosphate 5–15 ppm		
Silica <5 ppm		
Iron ppm		
MIXED BED		
pH 6.0 – 7.5	8.5	8.1
Conductivity <1mmhos	.4	.36
Silica <10 ppb		
HP Steam Test		
Silica <20 ppb		pH 7.9
SOFTENER		
Hardness <1.0 ppm		
Running (1 or 2)		1
STEAM TEST		
Silica <20 ppb		
PV NO.2		

HP BLOW DOWN — DAY SHIFT: — TIME:

	NORTH TANK (FEET)	SOUTH TANK (FEET)
SALT		

NOTES: Emissions Analyzer failed After Calibration again - NOx & CO failed!

NH3 delivery MH
26MES/B:1 MH
chiller off MH
23MES/B:1 MH

ACKO# 000-3011 – REV.1.4

DAILY ENVIRONMENTAL REPORT

End Time: 2/23/2021 7:00 — Start Time: 2/22/2021 7:00

Time	Duct burner gas flow MSCFH	Turbine gas flow MSCFH	Maxon Burner gas flow MMBTU/hr	Maxon Burner gas flow SCFH	SCR Temperature °F	SCR inlet NOx ppm	Ammonia Usage lb/h	NH3:NOx mole ratio	Injection steam rate lb/s	Steam to fuel ratio lb/lb	NOx lb/h	Stack O2 %	Stack CO 15% O2 ppm	CO lb/h	Stack NOx 15% O2 ppm	3h Running Average NOx	Nebraska O2 %	Nebraska NOx ppm	Nebraska Corrected NOx (ppm) (3% O_2)
8:00	6.08	242.87	1.49	1418.54	680.40	78.48	26.80	0.96	1.86	0.62	9.79	14.92	16.83	9.73	10.29	10.46	20.75	0.00	0.00
9:00	6.46	237.71	1.55	1487.95	673.45	74.50	24.40	0.96	1.80	0.62	9.78	15.01	18.54	10.42	10.53	10.46	20.73	0.00	0.00
10:00	6.65	240.35	2.08	2002.01	677.29	75.66	25.01	0.95	1.83	0.63	9.93	14.96	17.95	10.28	10.55	10.46	20.74	0.00	0.00
11:00	4.86	239.76	2.00	1925.67	675.48	77.27	30.51	1.51	1.83	0.63	4.47	15.12	14.25	8.14	5.24	8.88	20.76	0.00	0.00
12:00	5.19	240.79	1.15	1101.86	674.58	76.31	25.54	0.97	1.85	0.63	9.55	14.99	15.99	9.02	10.33	8.81	20.73	0.00	0.00
13:00	2.45	242.78	1.81	1757.76	675.16	77.44	25.78	0.98	1.86	0.63	9.87	15.00	13.75	7.99	10.53	8.80	20.76	0.00	0.00
14:00	6.80	243.59	1.23	1179.54	680.70	76.29	26.27	0.97	1.88	0.63	10.28	14.89	15.86	9.21	10.40	10.42	20.68	0.00	0.00
15:00	4.80	242.10	2.80	2700.18	674.14	62.15	26.89	4.19	1.87	0.63	10.84	15.53	18.65	11.62	9.25	10.06	20.63	0.00	0.00
16:00	-0.02	243.86	2.85	2740.40	664.15	-8.36	26.63	-3.29	1.86	0.63	1.02	0.58	0.01	-0.10	1.46	9.06	20.55	0.00	0.00
17:00	6.94	244.11	3.02	2911.93	673.88	45.14	26.63	4.09	1.86	0.63	3.07	9.80	9.54	3.00	3.90	8.70	20.47	0.00	0.00
18:00	12.64	240.74	3.28	3156.76	682.82	28.16	26.63	13.81	1.84	0.63	7.62	12.96	14.97	8.58	8.02	8.29	20.45	0.00	0.00
19:00	12.05	237.96	2.48	2381.96	684.55	63.36	25.71	1.18	1.81	0.62	7.37	15.48	22.26	12.78	7.86	8.39	20.45	0.00	0.00
20:00	9.76	236.35	2.03	1934.16	679.70	65.62	22.14	0.98	1.78	0.62	9.71	15.47	21.54	12.29	10.38	8.75	20.42	0.00	0.00
21:00	11.01	240.05	3.05	2966.79	681.13	83.85	21.53	0.96	1.82	0.62	9.98	15.45	22.54	12.90	10.43	9.58	20.44	0.00	0.00
22:00	10.53	240.74	3.18	3083.60	684.57	84.46	21.67	0.96	1.83	0.62	9.98	15.41	23.33	13.81	10.45	10.42	20.45	0.00	0.00
23:00	7.83	240.74	3.17	3059.26	676.74	64.55	21.60	0.95	1.83	0.62	9.99	15.45	22.67	13.20	10.56	10.48	20.46	0.00	0.00
0:00	6.89	241.08	3.03	2912.30	675.63	68.04	22.68	0.96	1.84	0.62	10.02	15.34	20.69	11.95	10.61	10.54	20.50	0.00	0.00
1:00	6.54	240.90	1.72	1658.62	675.71	70.86	23.86	0.97	1.84	0.62	9.89	15.29	19.57	11.18	10.49	10.55	20.53	0.00	0.00
2:00	6.71	240.74	2.87	2760.55	677.36	72.72	24.59	0.97	1.81	0.62	9.82	15.22	18.49	10.57	10.41	10.50	20.52	0.00	0.00
3:00	6.70	238.98	2.84	2736.87	675.66	72.23	24.23	0.97	1.79	0.62	9.86	15.21	19.39	11.15	10.55	10.48	20.55	0.00	0.00
4:00	6.75	236.99	1.64	1548.33	675.48	71.80	23.96	0.97	1.78	0.62	9.85	15.17	19.14	10.86	10.38	10.45	20.58	0.00	0.00
5:00	8.90	237.49	2.43	2367.02	676.92	69.48	23.17	0.95	1.79	0.62	9.70	15.12	20.12	11.40	10.34	10.42	20.61	0.00	0.00
6:00	6.66	236.81	2.97	2851.09	669.00	69.21	22.58	0.95	1.78	0.62	9.75	15.12	20.20	11.34	10.52	10.41	20.65	0.00	0.00
7:00	6.89	236.30	2.92	2808.78	669.42	69.65	22.68	0.95	1.78	0.62	9.75	15.10	20.31	11.40	10.51	10.48	20.66	0.00	0.00

Daily Av Cogen	Daily Av Cog+Neb
NOx	NOx
lb/h	lb/h
8.99	8.99

Daily Av Cogen	Daily Av Cog+Neb
CO	CO
lb/h	lb/h
10.10	10.10

Stack NOx analyzer	
zero value	-0.28
zero drift %	-0.28
span value	82.28
span drift %	0.42

Stack CO Analyzer	
zero value	-1.19
zero drift %	-1.19
span value	90.50
span drift %	-0.67

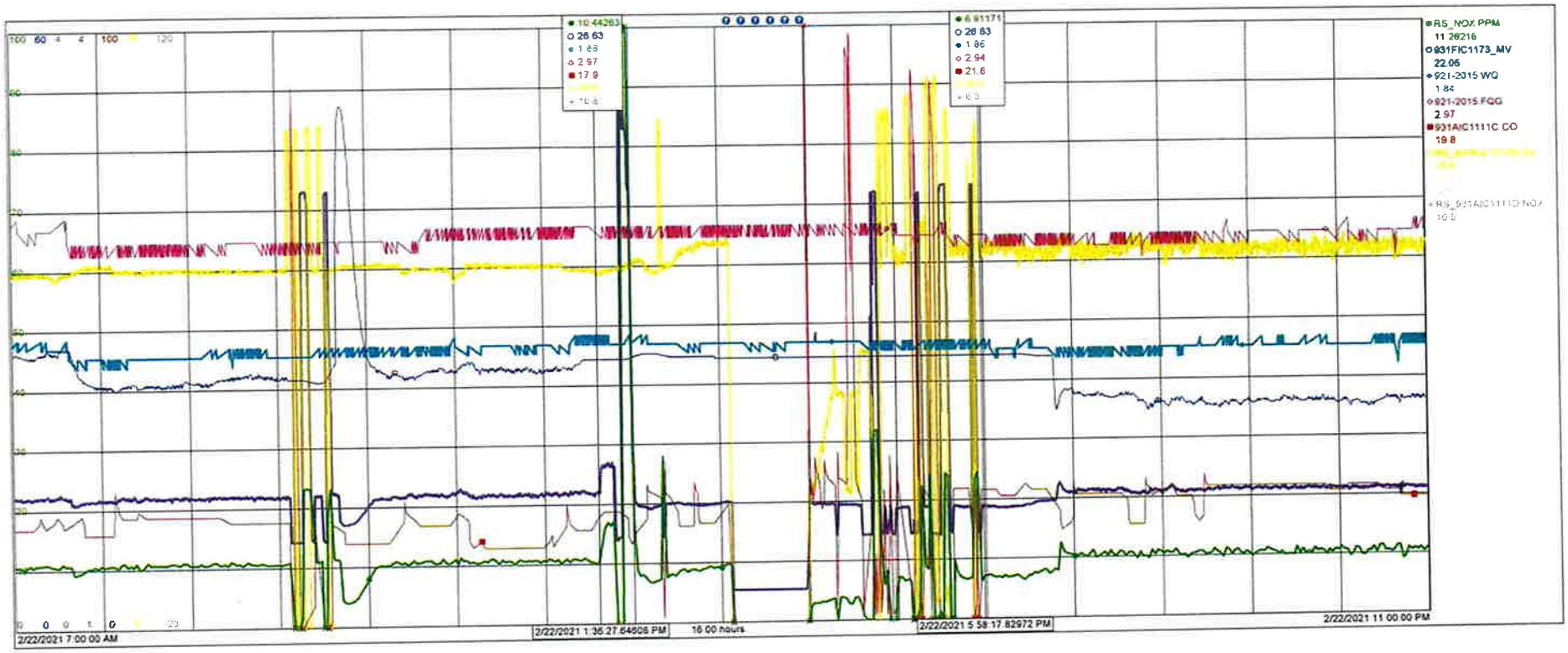
Stack O2 Analyzer	
span value	21.01
span drift %	0.41
zero value	-0.48
zero drift %	-0.48

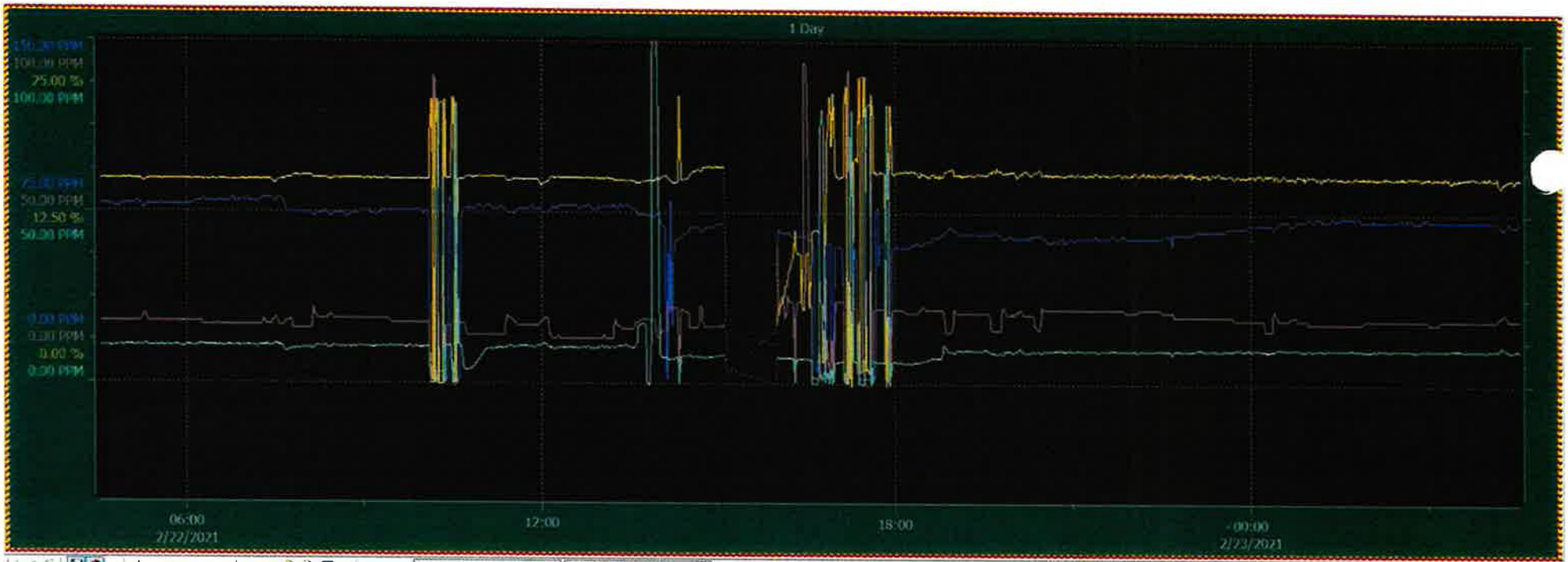
Nebraska Gas	0

Comments: CEMS maintenance was on 2/22/21 from 1:35 PM to 5:58 PM, a total of 4.37 hours. VCAPCD was notified on 2/20/21 at 11:16 AM.

PRINT TIME: 2/23/2021 11:42 AM

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


RS_NOX PPM
11.26216
931FIC1173_MV
22.06
921-2015 WQ
1.84
921-2015 FQG
2.97
931AIC1111C CO
19.8
2/22/2021 7:00:00 AM
2/22/2021 1:36:27.64506 PM
16.00 hours
2/22/2021 5:58:17.82972 PM
2/22/2021 11:00:00 PM



1 Day | 2/22/2021 4:32:05 PM

	Visible	S	Ta	Object	Object Name	Object Description	Propert	Log Name	Current Value	Low Range	High Range	Ruler Time	Ruler Value	Mean Value	Min Value	Max Value	Property Descri
1	☑			A6	931AIC1111A.NOX	B&W SCR INLET NOX	VALUE	SEAMLESS	78.61 PPM	0.00 PPM	150.00 PPM	2/22/2021 2:28:53		67.47 PPM	0.33 PPM	81.98 PPM	VALUE
2	☑			A5	931AIC1111C.CO	B&W BLR STACK RAW CO	VALUE	SEAMLESS	14.53 PPM	0.00 PPM	100.00 PPM	2/22/2021 2:28:53		18.37 PPM	-1.19 PPM	94.21 PPM	VALUE
3	☑			A4	931AIC1111B.O2	B&W BLR RAW O2%	VALUE	SEAMLESS	14.83 %	0.00 %	25.00 %	2/22/2021 2:28:53		14.77 %	-0.17 %	22.59 %	VALUE
4	☑			A3	931AIC1111D.NOX	B&W BLR STACK NOX	VALUE	SEAMLESS	10.63 PPM	0.00 PPM	100.00 PPM	2/22/2021 2:28:53		11.03 PPM	-0.37 PPM	102.97 PPM	VALUE
5	☐			D2	931-AIC-1111.INCAL	RSMT CEMS IN CAL	VALUE	SEAMLESS	0.00	0	1			0	0	1	VALUE
6	☐			D1	931-aic-1111.trb	RSMT CEMS TROUBLE	VALUE	SEAMLESS	1.00					1	0	1	VALUE
7	☐																
8	☐																

2/23/2021 9:20:33 AM

DAY SHIFT OPERATOR NAME: RoB

NIGHT SHIFT OPERATOR NAME: MH

STEAM & WATER READINGS / GAS & ELECTRIC READINGS

	PERMEATE H2O	CONCENTRATE H2O	LP	HP	SCG LP	TURBINE	MAXON	DUCT BURNER	MEGAWATTS
CURRENT	6398392	1758255	221978	1813	0858490	9584880	4855278	170321	39506
PREVIOUS	6388298	1753269	230730	1963	0837970	9263010	4849675	258903	38970

NEW DEMIN TRAILER YES ☐ NO ☑ TANK 1 % TANK 2 %

AMMONIA DELIVERY YES ☑ NO ☐ % FULL:

CHILLER HOURS: PACESETTER ON / OFF ALARM: RED ☐ YELLOW ☐ GREEN ☐

TURBINE

		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00
FMV	%	69	66	67	68	67	68	65.1	67.2	67.4	67.5	65.2	66
Inlet Temp	°F	67	62	66	69	65	62	64	62	61	64	62	54
Humidity	%	16	15	10	10	20	32	43.8	53	43.7	23.7	21.8	33
Vibration (Max)	MILS	72	36	41	42	35	.31	.40	.39	.27	.26	.30	.31
Steam Injection	#/SEC	1.8	1.8	1.8	1.8	1.8	1.8	1.75	1.81	1.81	1.81	1.81	1.81
Turbine L.O. Level	%	99	99	99	99	99	99	99	99	99	99	99	99
T54	°F	1425	1397	1914	1420	1412	1904	1397	1402	1398	1408	1356	1376

Day: BATTERIES V; AIR INLET DIFF IN/H2O; L.O. DIFFERENTIAL PSI; HP RECOUPE FAL; HP RECOUPE FAR; HP RECOUPE AFT

Night: BATTERIES 126.6 V; AIR INLET DIFF 2.1 IN/H2O; L.O. DIFFERENTIAL 6 PSI; HP RECOUPE FAL; HP RECOUPE FAR; HP RECOUPE AFT

ONLINE TURBINE WATER WASH YES ☐ NO ☑ CRANK WASH YES ☐ NO ☑ > GALLONS CONDUCTIVITY MHOS

BOILER FEED WATER PUMP OPERATION: NO.1 PUMP YES ☑ NO ☐ NO.2 PUMP YES ☐ NO ☐

GENERATOR

		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00
Gen. Bearing Drain	°F	150	151	155	164	165	165	153	151	150	150	150	150
L.O. Supply	°F	119	120	125	126	126	126	123	122	120	119	119	119
Gen. Vibration (Max)	IPS	31	31	31	32	33	32	.30	.30	.36	.39	.38	.38
Tie Line	MW	9.8	10	10	9.8	9.9	9.9	9.85	9.88	10.09	9.81	9.91	10
Generator Voltage	KV												

Day: GEN. AMPS; GEN.VARS MEGA VARS; FIELD AMPS; FIELD VOLTS V; COOLING TWR INLET °F; COOLING TWR OUTLET °F

Night: GEN. 1001 AMPS; GEN.VARS 1.48 MEGA VARS; FIELD 172 AMPS; FIELD VOLTS 140.5 V; COOLING TWR INLET 88 °F; COOLING TWR OUTLET 82 °F

COGEN BOILER

		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00
450 Header Temp	°F	717	718	718	716	718	718	718	718	718	718	719	718
HP Drum Level	IN	1.0	1.3	1.5	1.4	1.6	1.3	2.5	.5	1.3	2.0	1.4	1.8
LP Drum Level	IN	1.1	.9	1	1.1	2.9	1	1.6	1.8	1.0	1.7	1.1	1.3
HP Drum Pressure	PSI	481	481	474	474	467	481	481	482	482	482	482	485
LP Drum Pressure	PSI	149	150	150	156	147	149	150	158	150	158	154	149
CO	PPM	16.5	16	14.1	13.1	|	|	23.1	22.1	21.9	18.2	20.6	22.7
NOx	PPM	10.3	10.3	10	10.7	|	|	10.1	10.4	9.8	11.2	11.3	11.5
O2	%	14.8	15	15	15			15.24	15.40	14.97	15.36	15.32	15.15
Hot Well Level	%	127	135	161	150	157	140	161	144	155	149	152	142

		8:00	10:00	12:00	14:00	16:00	18:00	20:00	22:00	24:00	2:00	4:00	6:00
450 Header Temp	°F	66	718	718	718	718	717	719	718	718	718	718	718
HP Drum Level	IN	62	1.6	.8	1.5	1.3	1.4	2.1	1.4	1.4	1.9	1.4	1.4
LP Drum Level	IN	2.3	1.1	.6	2.3	.9		1.1	1.2	1.0	1.1	.8	1.1
HP Drum Pressure	PSI	1.4	481	475	467	481	481	474	482	482	492	475	475
LP Drum Pressure	PSI	149	151	151	147	149	156	148	150	150	156	157	157
CO	PPM	16	|	13.3	|	|	|	22.1	21.9	20.2	17.8	26	19.5
NOx	PPM	10.5	|	10.5	|	|	|	10.4	10	10.9	9.7	10.9	10.1
O2	%	15		15.2				15.57	15.17	15.50	15.64	15.34	14.98
Hot Well Level	%	136	134	155	147	148	155	139	148	140	152	154	146

AUTO / ON / OFF

Day: 1150 SET POINT; 1103 B SET POINT; DUCT BURNER S/P

Night: 1150 SET POINT 4.51; 1103 B SET POINT 447; DUCT BURNER S.P. 444

COMPRESSORS

		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00
Filter Separator	PSI	230	232	234	234	232	232	230	230	232	234	234	232
Gas Receiver	PSI	420	420	421	420	420	420	420	420	426	419	420	421

Day: Crankcase Oil Level %; Frame Oil Pressure (25-50) PSI; Temp. cooling °F T1 T2

Night: Crankcase Oil Level % /60; Frame Oil Pressure (25-50) PSI 22.61; Temp. cooling °F T1 T2 63

BOILER TEST RESULTS

	DAY SHIFT	NIGHT SHIFT
BOILER FEEDWATER		
pH 8.75– 9.5	8.6	8.7
Conductivity <5mmhos	8.9	7.5
Silica <20 ppb		
R.O.		
Feed TDS<1000 ppm		
Permeate TDS<10 ppm		
pH (Feed 7.5)	7.2	7.1
CONDENSATE		
HP–pH 8.5 –9.5	8.5	
Conductivity <20mmhos	15	
LP–pH 8.5–9.5	9.2	
Conductivity <20mmhos		
HP		
pH 9.5 – 10.5	9.3	9.4
Conductivity 75–150	135	122
Phosphate 5–15 ppm		
Silica <5 ppm		
Iron ppm		
LP		
pH 9.5 – 10.5	9.7	9.9
Conductivity 75 – 150	120	116
Phosphate 5–15 ppm		
Silica <5 ppm		
Iron ppm		
MIXED BED		
pH 6.0 – 7.5	7.8	7.1
Conductivity <1mmhos	.4	.39
Silica <10 ppb		
HP Steam Test		
Silica <20 ppb		PH 8.2
SOFTENER		
Hardness <1.0 ppm		
Running (1 or 2)		1
STEAM TEST		
Silica <20 ppb		
PV NO.2		
HP BLOW DOWN	DAY SHIFT:	
TIME:		
	NORTH TANK	SOUTH TANK
SALT	FEET	FEET

NOTES: Added Hyd Oil to Starter - Marked Sight glass

A Guy Came to Work on the Rosemount Gas Analyzer Started about 2 pm till 6:30

Chiller On @ 2pm off @ 6:30 pm

3 MESB:111

MH

DATE: 2-22-21 OFFICIAL DAILY COGENERATION LOG NEW-INDY CONTAINERBOARD OXNARD MILL

New-Indy Oxnard Environmental Incident Report

Shaded section to be completed by the EMR

Name of Incident CEMS Malfunction		Incident Date: 2/20/21
Exact Location Incident Cogen CEMS		
Reported By: James West	Estimated Start and Stop Times of Incident: 2/20/21 10:32 AM – 2/22/21 5:58 PM	Possible Cause: O2 sensor and Power Supply

Incident Type:		Released To	
ف Spill Internal	ف Improper Waste Disposal	ف Storm Water System	ف Secondary Containment
ف Spill External	ف Near miss or below spill release guidelines	ف Process Sewer	X Air
X Air Emission		ف Ground (External)	ف Ground (Inside Mill Property)
ف Other_____		ف Near Miss	
		ف Other_____	

Detailed Description of Event:
On 2/20/21, CEMS malfunctioned after the auto cal. Technician called in, but unable to get O2 to calibrate properly after re-boot. Vendors contacted and was on site on 2/22/21. Two issues were found: Could not get O2 to calibrate and control properly – replaced O2 module. CEM's controller would re-boot intermittently - replaced power supply. Ammonia was operated manually during maintenance to avoid excess emission.

(if required use additional paper and attach)

Estimated Amount Released	pH	CONSISTENCY (%)	Estimated Monetary Loss
ف _____ Gallons ف _____ Pounds ف Other_____			

List Any External Emergency Clean Up Personnel Contacted N/A	List Any External Agencies Contacted *(Agency, person, and time of call.)* *VCAPCD, James West, 11:16AM*
List Hueneme Personnel Contacted *(Foreman, Mill Manager, etc.)* Robyn L, Lars G.	Any Acute or Chronic Health Risks *(refer to MSDS)* N/A

Describe Any Emergency Response Actions:
Technician called in, unable to resolve. Vendors contacted, on-site 2/22/2021.

Suggestions to Prevent Reoccurrence	Estimated Completion Date
1. Add spare O2 module to stores.	1. 3/31/2021
2. Add spare power supply to stores.	2. 3/31/2021
3.	3.
4.	4.

Root Cause: Faulty O2 module and power supply.	Severity Level *(level 1 and 2 must be tracked through SHIMS)* ف 1 ف 2 ف 3 ف 4
Investigated By: Lars Gustavson	Investigated Date: 2/20, 21, 22/2021

Follow Up	By When	Completion Date	By Whom

Issued by	Reviewed by	Approved by
2/24/21		
Department Manager	Technical Superintendent 2/24/21	Mill Manager 2/24/2021

Print Time: 2/24/2021 10:02:04 AM

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

NEW INDY
CONTAINERBOARD

March 2, 2021

Ventura County Air Pollution Control District
4567 Telephone Road, 2nd Floor
Ventura, CA 93003

Attention: Ed Swede
Subject: Continuous Emission Monitoring System (CEMS) Malfunction - Oxygen

Dear Mr. Swede:

New-Indy Oxnard is submitting this follow-up report for a call made to VCAPCD Breakdown Center Hotline by Zhen Han on February 24, 2021 at 1:45 PM.

On 2/24/21 at 10:30 AM, the cogen CEMS unit malfunctioned again. The CEMS was not measuring correctly for oxygen (failed O2 calibrations and significant O2 drift) and the system reboots intermittently after the auto calibration. The CEMS continues to malfunction even if the following corrective actions had been completed on 2/22/21: (1) the system was checked for possible leak and moisture issues; (2) O2 sensor was replaced; and (3) a new CEMS power supply was installed. The circuit board control was failing per CEMS manufacturer. To avoid excess emissions, the ammonia flow to SCR is controlled by the raw NOx instead of the corrected NOx since O2 data is not valid.

New-Indy decided to purchase a new unit on 2/26/21 to prevent the reoccurring CEMS issues. We expect delivery of the unit by 3/16/21. A petition for emergency variance from Rule 103 (Stack Monitoring) was submitted and approved on 2/26/21 allowing for continued cogen operation while the mill repair/replace the CEMS. We will provide CEMS progress update on a weekly basis.

The Daily Emission Sheets (reflecting uncorrected NOx & CO), PI trends, ABB trends, Daily Logs and Environmental Incident Report have been provided for your review. If you have any questions or require any additional information, please call Robyn Lebrilla at (805) 271-7284.

Sincerely,

Victor Kumpera
Technical Manager

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

Ventura County
Air Pollution

Control District

RESPONSIBLE OFFICIAL'S CERTIFICATION FORM

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

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

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

Certification by Responsible Official

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

Signature and Title of Responsible Official:	Date:
Signature: Judy Geller	3/1/2021
Title: Mill Manager	

End Time 2/25/2021 7:00 Start Time 2/24/2021 7:00

DAILY ENVIRONMENTAL REPORT - Based On Raw/Uncorrected NOx and CO

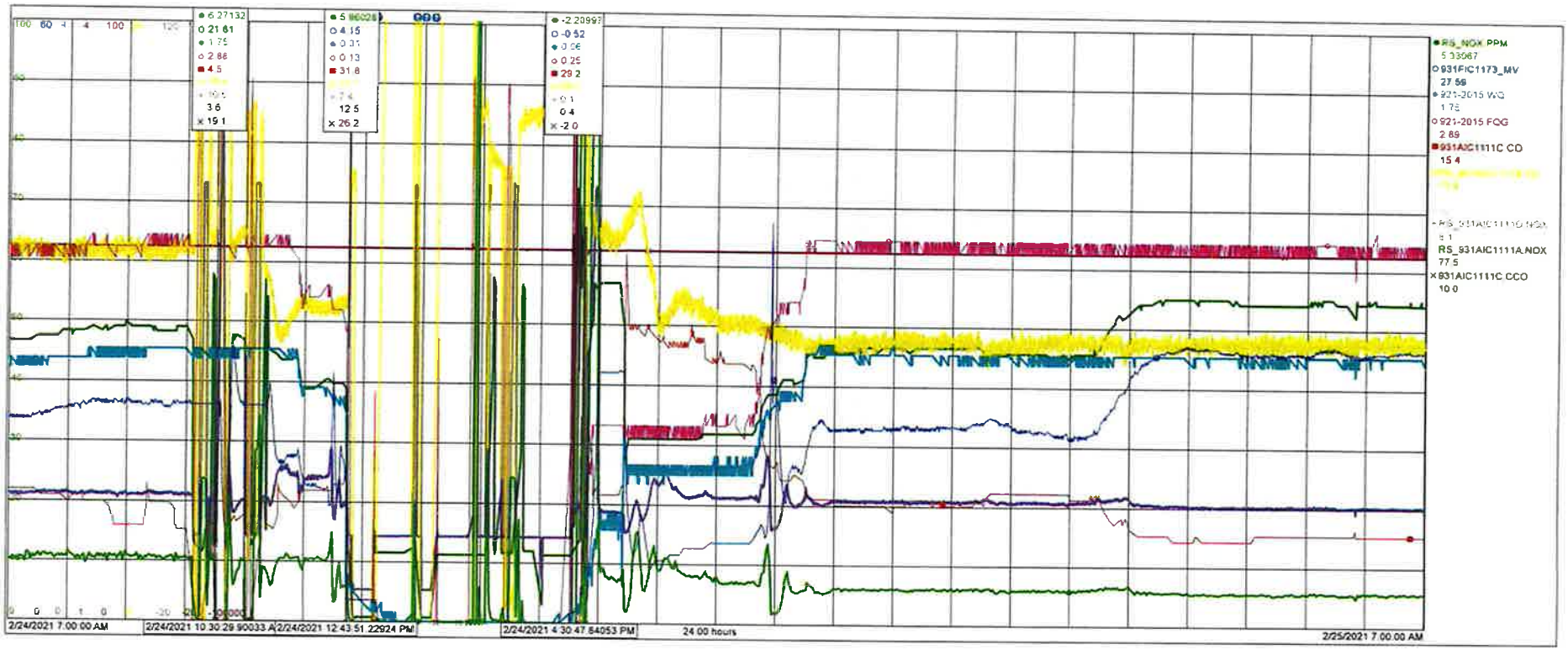
Time	Duct burner gas flow MSCFH	Turbine gas flow MSCFH	Mixon Burner gas flow MMBTU/hr	Mixon Burner gas flow SCFH	SCR Temperature °F	SCR inlet NOx ppm	Ammonia Usage lb/h	NH3:NOx mole ratio	Injection steam rate lb/lb	Steam to fuel ratio lb/lb	NOx Raw/Uncorrected lb/h	Stack O2 %	Stack CO Raw/Uncorrected ppm	CO Raw/Uncorrected lb/h	Stack NOx Raw/Uncorrected ppmv	3h Running Average Raw NOx	Nebraska O2 %	Nebraska NOx ppm	Nebraska Corrected NOx (ppm) (3% O_2)	Daily Av Cogen NOx lb/h	Daily Av Cog+Neb NOx lb/h
8:00	6.67	232.59	3.27	3144.56	664.95	64.87	20.65	0.94	1.73	0.61	8.93	15.42	21.38	11.86	**9.80**	**9.80**	20.29	0.00	0.00	6.90	6.90
9:00	5.03	235.79	3.36	3238.96	666.61	67.49	21.73	0.96	1.77	0.62	8.92	15.45	19.14	10.69	**9.72**	**9.75**	20.22	0.00	0.00	Daily Av Cogen	Daily Av Cog+Neb
10:00	3.37	236.13	1.24	1187.30	665.08	67.67	21.74	0.95	1.80	0.63	8.86	15.43	17.83	9.90	**9.71**	**9.75**	20.24	0.00	0.00	CO	CO
11:00	0.14	235.61	0.53	470.40	658.57	52.98	20.80	0.58	1.78	0.62	5.82	14.49	14.95	8.17	**6.48**	**8.64**	20.21	0.00	0.00	lb/h	lb/h
12:00	8.46	233.90	0.00	0.00	672.73	42.60	18.89	5.57	1.78	0.62	15.52	12.16	18.89	10.91	**16.81**	**11.00**	20.20	0.00	0.00	9.42	9.42
13:00	4.82	157.47	0.00	0.00	632.86	33.64	11.07	-0.22	1.15	0.85	4.21	11.02	17.42	6.56	**6.81**	**10.03**	20.21	0.00	0.00	**Stack NOx analyzer**	
14:00	-0.02	10.24	0.00	0.00	499.11	-3.24	0.18	-25.68	0.04	0.37	0.08	15.23	-2.84	-0.07	**1.50**	**8.38**	20.26	0.00	0.00	zero value	-0.03
15:00	-0.02	10.24	0.00	0.00	499.10	-3.70	-0.52	-79.25	0.00	0.22	0.05	12.31	2.18	0.05	**1.41**	**3.24**	20.29	0.00	0.00	zero drift %	-0.03
16:00	-0.02	10.24	0.00	0.00	499.10	13.56	-0.52	-45.49	0.00	0.24	0.40	11.99	4.00	0.09	**10.28**	**4.40**	20.28	0.00	0.00	span value	82.28
17:00	-0.02	55.15	0.00	0.00	503.43	17.09	2.17	-41.33	0.14	0.21	3.26	11.57	27.35	3.50	**15.54**	**9.67**	20.31	0.00	0.00	span drift %	0.42
18:00	-0.01	162.20	0.00	0.00	604.05	54.41	15.75	1.09	0.89	0.45	4.18	16.10	38.03	14.30	**6.77**	**10.86**	20.24	0.00	0.00		
19:00	2.91	163.05	0.00	0.00	611.41	36.20	7.35	0.87	1.03	0.52	7.16	13.10	46.60	17.93	**11.32**	**11.21**	20.21	0.00	0.00	**Stack CO Analyzer**	
20:00	6.72	174.69	0.00	0.00	627.16	40.54	10.43	1.00	1.15	0.54	7.02	12.46	39.41	15.58	**10.16**	**9.42**	20.22	0.00	0.00	zero value	-0.66
21:00	8.97	227.40	2.87	2800.05	663.50	57.41	17.77	0.98	1.69	0.61	7.72	11.91	23.08	12.64	**8.58**	**10.02**	20.18	0.00	0.00	zero drift %	-0.66
22:00	6.69	239.20	3.37	3239.92	672.72	63.02	19.70	0.91	1.81	0.62	8.66	11.82	20.07	11.44	**9.24**	**9.33**	20.19	0.00	0.00	span value	90.34
23:00	6.69	238.98	3.37	3245.45	670.18	63.56	19.89	0.90	1.80	0.62	8.61	11.78	20.66	11.77	**9.20**	**9.01**	20.21	0.00	0.00	span drift %	-0.84
0:00	13.06	238.34	2.31	2223.90	660.46	63.17	20.33	0.91	1.79	0.62	8.90	11.75	21.33	12.43	**9.30**	**9.25**	20.20	0.00	0.00		
1:00	9.33	237.84	3.15	3002.71	675.16	61.84	19.49	0.91	1.78	0.62	8.56	11.85	22.36	12.82	**9.09**	**9.19**	20.26	0.00	0.00	**Stack O2 Analyzer**	
2:00	9.41	238.85	0.92	910.30	673.30	66.78	20.88	0.93	1.79	0.62	9.18	11.85	19.97	11.50	**9.70**	**9.36**	20.39	0.00	0.00	span value	20.78
3:00	6.72	240.10	2.73	2629.36	678.58	78.14	27.12	1.00	1.81	0.62	8.22	11.84	15.19	8.70	**8.75**	**9.18**	20.54	0.00	0.00	span drift %	-0.66
4:00	6.67	238.86	2.73	2629.91	677.47	78.66	27.80	1.02	1.80	0.62	7.81	11.81	14.51	8.26	**8.36**	**8.93**	20.71	0.00	0.00	zero value	-0.49
5:00	6.67	237.15	2.64	2542.89	677.18	77.58	27.45	1.03	1.78	0.62	7.77	11.81	15.36	8.69	**8.37**	**8.49**	20.84	0.00	0.00	zero drift %	-0.49
6:00	6.69	239.71	2.53	2444.74	677.29	77.88	27.70	1.02	1.80	0.62	7.86	11.81	15.47	8.84	**8.38**	**8.37**	20.87	0.00	0.00		
7:00	6.70	239.66	2.54	2413.52	677.11	77.85	27.66	1.02	1.81	0.62	7.86	11.84	15.38	8.78	**8.37**	**8.37**	20.83	0.00	0.00	**Nebraska Gas**	**0**

Comments: CEMS Oxygen malfunctioned on 2/24/21 from 10:30 AM to 12:43 PM and from 4:40 PM to 2/25/21 7:00 AM, a total of 16.55 hours. Cogen tripped on 2/24/21 from 12:43 PM to 4:40 PM. VCAPCD was notified on 2/24/21 at 1:45 PM

SINCE CEMS WAS NOT MEASURING CORRECTLY FOR O2, THIS REPORT REFLECTS UNCORRECTED NOX AND CO.

PRINT TIME: 3/1/2021 3:05 PM

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


RS_NOX PPM
931FIC1173_MV
27.59
921-2015 WG
1.75
921-2015 FOG
2.89
931AIC1111C.CO
15.4
RS_931AIC1111A.NOX
77.5
931AIC1111C.CCO
10.0
2/24/2021 7:00:00 AM
2/24/2021 10:30:29.90033 A
2/24/2021 12:43:51.22924 PM
2/24/2021 4:30:47.84053 PM
24.00 hours
2/25/2021 7:00:00 AM

Root/Oxnard Mill/S \rea: T-921-020-02

1 Day 2/24/2021 2:44:18 PM

	Visible	S	T	Object	Object Name	Object Description	Propert	Log Name	Current Value	Low Range	High Range	Ruler Time	Ruler Value	Mean Value	Min Value	Max Value	Property Descri
1	☑				931AIC1111A.NOX	B&W SCR INLET NOX	VALUE	SEAMLESS	73.45 PPM	0.00 PPM	150.00 PPM	2/24/2021 2:13:30		50.95 PPM	-5.63 PPM	153.38 PPM	VALUE
2	☑				931AIC1111C.CO	B&W BLR STACK RAW CO	VALUE	SEAMLESS	17.28 PPM	0.00 PPM	100.00 PPM	2/24/2021 2:13:30		21.86 PPM	-1.13 PPM	102.97 PPM	VALUE
3	☑				931AIC1111B.O2	B&W BLR RAW O2%	VALUE	SEAMLESS	14.75 %	0.00 %	25.00 %	2/24/2021 2:13:30		14.82 %	-1.34 %	25.74 %	VALUE
4	☑				931AIC1111D.NOX	B&W BLR STACK NOX	VALUE	SEAMLESS	8.91 PPM	0.00 PPM	100.00 PPM	2/24/2021 2:13:30		10.47 PPM	-4.05 PPM	102.97 PPM	VALUE
5	☑				931-AIC-1111.INCAL	RSMT CEMS IN CAL	VALUE	SEAMLESS	0.00	0	1	2/24/2021 2:13:30		0	0	1	VALUE
6	☑				931-aic-1111.trb	RSMT CEMS TROUBLE	VALUE	SEAMLESS	1.00	0	1	2/24/2021 2:13:30		1	0	1	VALUE
7	☐																
8	☐																

2/25/2021 2:44:33 PM

OFFICIAL DAILY COGENERATION LOG

NEW-INDY CONTAINERBOARD
OXNARD MILL

DATE: 2-24-2021

	STEAM & WATER READINGS				GAS & ELECTRIC READINGS				
	PERMEATE H2O	CONCENTRATE H2O	LP	HP	SCG LP	TURBINE	MAXON	DUCT BURNER	MEGAWATTS
CURRENT	6416625	1767538	178440	1376	0877030	0109890	4863960	126434	40368
PREVIOUS	6407097	1762835	190902	1571	0868620	9860290	4860410	134261	39958

NEW DEMIN TRAILER YES ☐ NO ☑ TANK 1 ___ % TANK 2 ___ % CHILLER HOURS:

AMMONIA DELIVERY YES ☐ NO ☑ % FULL: PACESETTER ON / OFF ALARM: RED ☐ YELLOW ☐ GREEN ☐

TURBINE

		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00
FMV	%	64.00	64.75	64.50				47.7	70.3	66	65.6	66.3	66.2
Inlet Temp	°F	52	61	61				55	56	54	49	65	63
Humidity	%	48.2	40.1	48.0				72.4	67.2	67.3	71.4	14.5	14.4
Vibration (Max)	MILS	.39	.36	.42				.43	.40	.42	.45	.50	.52
Steam Injection	#/SEC	1.69	1.81	1.81				1.06	1.88	1.81	1.75	1.81	1.81
Turbine L.O. Level	%	100	100	100				100	100	100	100	100	100
T54	°F	1361	1386	1387				1199	1388	1382	1365	1411	1406

Day: BATTERIES 127.0 V HP RECOUPE ___ FAL; AIR INLET DIFF 2.0 IN/H2O HP RECOUPE ___ FAR; L.O. DIFFERENTIAL 6 PSI HP RECOUPE ___ AFT

Night: BATTERIES 128.2 V HP RECOUPE ___ FAL; AIR INLET DIFF 4.5 IN/H2O HP RECOUPE ___ FAR; L.O. DIFFERENTIAL 6 PSI HP RECOUPE ___ AFT

ONLINE TURBINE WATER WASH YES ☐ NO ☑ CRANK WASH YES ☐ NO ☑ > ___ GALLONS CONDUCTIVITY MHOS ___

BOILER FEED WATER PUMP OPERATION: NO.1 PUMP YES ☑ NO ☐ NO.2 PUMP YES ☐ NO ☐

GENERATOR

		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00
Gen. Bearing Drain	°F	149	150	151		Down		145	146	147	148	149	149
L.O. Supply	°F	119	120	120				115	116	118	119	120	120
Gen. Vibration (Max)	IPS	.32	.33	.32				.35	.34	.33	.33	.35	.31
Tie Line	MW	10.08	10.03	9.89				10.52	10.58	10.38	10.55	10.48	10.45
Generator Voltage	KV												

Day: GEN. ___ AMPS GEN.VARS ___ MEGA VARS; FIELD ___ AMPS FIELD VOLTS ___ V; COOLING TWR INLET ___ °F COOLING TWR OUTLET ___ °F

Night: GEN. 575 AMPS GEN.VARS .55 MEGA VARS; FIELD 143.4 AMPS FIELD VOLTS 111.1; COOLING TWR INLET 79 °F COOLING TWR OUTLET 73 °F

COGEN BOILER

		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00
450 Header Temp	°F	718	718	717				717	718	718	718	718	719
HP Drum Level	IN	1.6	2.3	1.5				1.6	1.7	1.5	1.5	1.8	1.6
LP Drum Level	IN	1.7	1.0	1.2				.7	.3	1.0	1.4	1.7	1.2
HP Drum Pressure	PSI	477	477	463	Down			460	481	481	481	482	482
LP Drum Pressure	PSI	150	150	147				150	151	151	153	150	150
CO	PPM	28.6	16.9	19.4				30.2	13.3	13.1	14.7	9.9	10.2
NOx	PPM	10.3	10.3	8.0				7.0	5.5	6.0	5.7	5.4	5.6
O2	%	15.52	15.38	15.60				12.68	11.57	11.71	12.26	11.61	11.95
Hot Well Level	%	140	147	137				153	146	162	160	154	145

		8:00	10:00	12:00	14:00	16:00	18:00	20:00	22:00	24:00	2:00	4:00	6:00
450 Header Temp	°F	718	717	720			713	718	718	718	718	718	710
HP Drum Level	IN	1.3	1.8	0.8			0.7	.4	1.3	2.8	-.2	1.4	1.5
LP Drum Level	IN	1.1	1.0	0.6			0.5	.0	.8	2.4	1.4	1.4	1.1
HP Drum Pressure	PSI	477	463	477	Down	Down	460	467	481	481	482	482	482
LP Drum Pressure	PSI	150	142	155			145	155	151	150	152	150	150
CO	PPM	21.8	16.8	H/			H/	18.8	13.3	19.2	11	10.1	9.6
NOx	PPM	10.2	10.3	Link			H/CR	1.5	5.9	5.7	6.5	5.6	5.4
O2	%	15.23	15.58					12.20	11.93	11.63	11.96	11.94	12.07
Hot Well Level	%	158	141	176			137	142	146	144	155	160	141

AUTO / ON / OFF — Day: 1150 SET POINT 451, 1103 B SET POINT 447, DUCT BURNER S/P 444. Night: 1150 SET POINT 451, 1103 B SET POINT 447, DUCT BURNER S.P. 444

COMPRESSORS

		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00
Filter Separator	PSI	231	231	233				236	232	232	232	234	234
Gas Receiver	PSI	419	420	420				410	410	420	420	420	420

Day: Crankcase Oil Level % ___; Frame Oil Pressure (25–50) PSI ___; Temp. cooling °F T1 ___ T2 ___

Night: Crankcase Oil Level % 100; Frame Oil Pressure (25–50) PSI 24.83; Temp. cooling °F T1 ___ T2 56

BOILER TEST RESULTS

	DAY SHIFT	NIGHT SHIFT
BOILER FEEDWATER		
pH 8.75–9.5		
Conductivity <5mmhos		
Silica <20 ppb		
R.O.		
Feed TDS<1000 ppm		
Permeate TDS<10 ppm		
pH (Feed 7.5)		
CONDENSATE		
HP-pH 8.5 –9.5		
Conductivity <20mmhos		
LP-pH 8.5–9.5		
Conductivity <20mmhos		
HP		
pH 9.5 – 10.5		
Conductivity 75–150		
Phosphate 5–15 ppm		
Silica <5 ppm		
Iron ppm		
LP		
pH 9.5 – 10.5		
Conductivity 75 – 150		
Phosphate 5–15 ppm		
Silica <5 ppm		
Iron ppm		
MIXED BED		
pH 6.0 – 7.5		
Conductivity <1mmhos		
Silica <10 ppb		
HP Steam Test		
Silica <20 ppb		
SOFTENER		
Hardness <1.0 ppm		
Running (1 or 2)		
STEAM TEST		
Silica <20 ppb		
PV NO.2		
HP BLOW DOWN	DAY SHIFT:	
TIME:		

	NORTH TANK	SOUTH TANK
SALT	FEET	FEET

NOTES: SWITCHED DOWN JS
PERM - 6408451
CONC - 1763510
INLET - 156.74 / 100 CHECK FOR NEW
ADDED 827 TO GAS COMP TANK
Pin Down 11:55
Trip 12:36 IDLE 16:30
AUTO 16:39
23 NE S%: //// MH ON LINE 16:40

NIGHT SHIFT OPERATOR NAME: MH

DAY SHIFT OPERATOR NAME: [illegible signature]

ACAD# 000-3011 – REV.1.4

End Time 2/26/2021 7:00 Start Time 2/25/2021 7:00

DAILY ENVIRONMENTAL REPORT - Based On Raw/Uncorrected NOx and CO

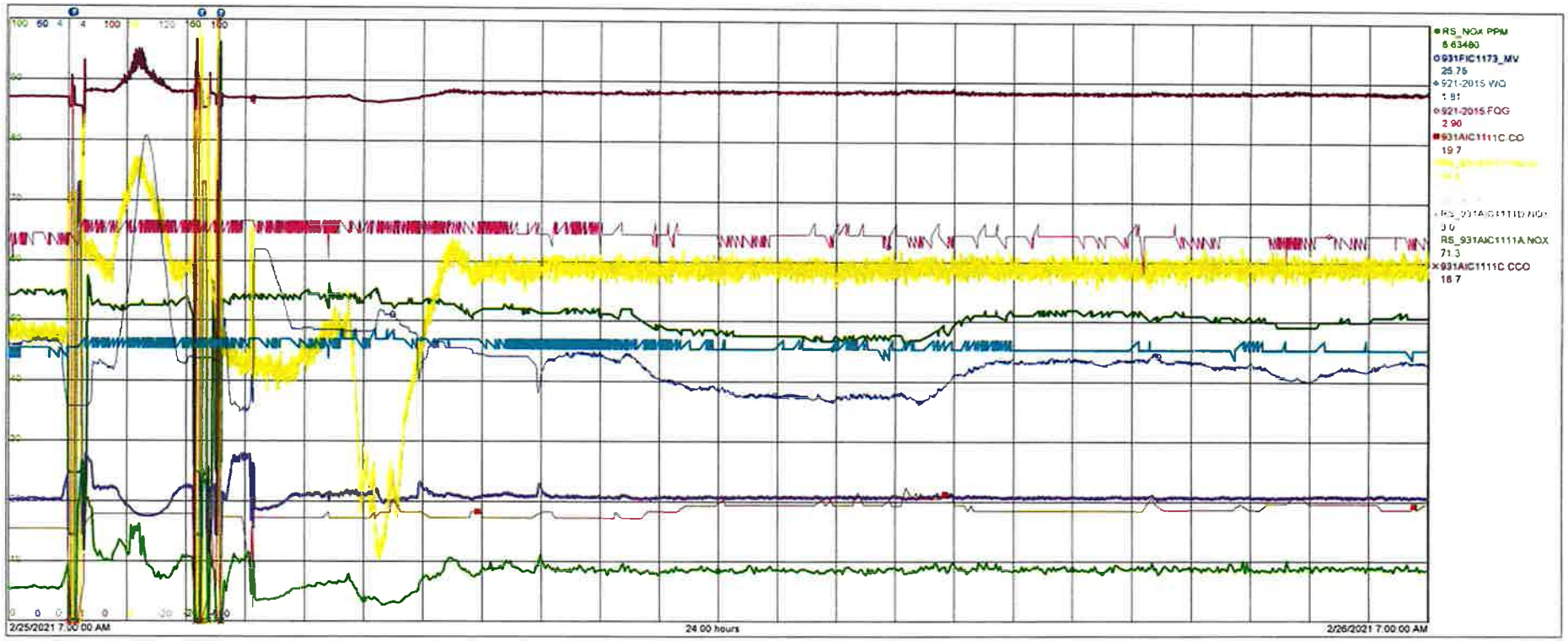
Time	Dust burner gas flow MSCFH	Turbine gas flow MSCFH	Mixon Burner gas flow MMBTU/hr	Mixon Burner gas flow SCFH	SCR Temperature °F	SCR inlet NOx ppm	Ammonia Usage lb/h	NH3:NOx mole ratio	Injection steam rate lbs/s	Steam to fuel ratio lb/lb	NOx Raw/Uncorrected lb/h	Stack O2 %	Stack CO Raw/Uncorrected ppm	CO Raw/Uncorrected lb/h	Stack NOx Raw/Uncorrected ppm	1h Running Average Raw NOx	Nebraska O2 %	Nebraska NOx ppm	Nebraska Corrected NOx (ppm) (3% O2)	Daily Av Cogen NOx lb/h	Daily Av Cog+Neb NOx lb/h
8:00	5.86	238.56	1.65	1612.40	676.77	78.15	27.33	1.02	1.80	0.62	8.12	11.53	15.37	8.76	8.68	8.48	20.84	0.00	0.00	8.77	8.77
9:00	5.71	241.01	2.59	2489.11	677.50	57.99	24.66	1.44	1.84	0.62	9.19	13.51	17.68	10.27	9.74	8.93	20.86	0.00	0.00		
10:00	5.62	242.05	2.08	1954.05	677.43	74.82	37.25	1.43	1.84	0.62	6.21	16.84	17.68	10.31	6.56	8.33	20.82	0.00	0.00	Daily Av Cogen CO lb/h	Daily Av Cog+Neb CO lb/h
11:00	5.66	242.15	1.09	1066.51	680.54	76.47	25.03	0.69	1.84	0.62	15.19	15.33	17.02	9.83	16.01	10.77	20.75	0.00	0.00		
12:00	5.71	244.96	2.35	2266.26	681.30	77.02	31.82	1.15	1.85	0.63	8.44	15.65	16.27	9.50	8.50	10.46	20.65	0.00	0.00	10.57	10.57
13:00	5.78	243.81	1.29	1214.03	681.44	77.10	29.04	1.05	1.85	0.63	9.18	11.06	17.28	10.03	9.62	11.48	20.56	0.00	0.00	Stack NOx analyzer	
14:00	7.20	244.37	0.49	483.43	682.59	75.90	29.26	1.09	1.87	0.63	8.57	8.58	18.27	10.88	9.05	9.16	20.40	0.00	0.00	zero value	0.03
15:00	5.73	245.89	0.00	0.00	681.12	74.25	27.21	1.02	1.87	0.63	8.88	14.32	17.52	10.25	9.35	9.34	20.38	0.00	0.00	zero drift %	0.03
16:00	5.74	242.74	0.00	0.00	679.62	73.42	26.22	1.01	1.84	0.63	9.03	14.81	17.36	10.04	9.51	9.39	20.41	0.00	0.00	span value	82.31
17:00	5.75	241.47	1.26	1287.39	677.43	72.73	26.47	1.03	1.84	0.62	8.63	14.77	17.48	10.06	9.13	9.33	20.41	0.00	0.00	span drift %	0.45
18:00	5.77	240.69	3.07	2956.53	677.37	71.01	25.84	1.03	1.84	0.62	8.36	14.87	17.62	10.11	8.86	9.16	20.31	0.00	0.00		
19:00	5.73	240.91	0.66	604.74	677.20	67.14	23.55	1.00	1.84	0.62	8.43	14.68	19.01	10.92	8.94	8.97	20.27	0.00	0.00	Stack CO Analyzer	
20:00	5.73	240.57	0.00	0.00	676.88	66.66	22.69	0.99	1.81	0.62	8.45	14.70	19.48	11.17	8.97	8.92	20.26	0.00	0.00	zero value	-0.28
21:00	5.79	240.74	0.00	0.00	676.95	65.05	22.36	0.99	1.82	0.62	8.48	14.68	19.57	11.23	8.98	8.96	20.26	0.00	0.00	zero drift %	-0.28
22:00	7.36	240.57	0.10	95.09	677.91	65.18	22.52	0.99	1.82	0.62	8.53	14.69	19.69	11.32	9.03	8.99	20.26	0.00	0.00	span value	91.44
23:00	5.78	240.57	0.00	0.00	675.95	65.83	22.79	0.99	1.83	0.62	8.66	14.73	20.69	11.96	9.11	9.04	20.36	0.00	0.00	span drift %	0.36
0:00	5.79	240.74	0.00	0.00	675.07	71.48	25.59	1.03	1.84	0.62	8.58	14.75	18.76	10.77	9.08	9.07	20.44	0.00	0.00		
1:00	5.80	240.74	0.00	0.00	673.76	72.52	26.09	1.03	1.81	0.62	8.50	14.75	18.53	10.64	9.01	9.07	20.42	0.00	0.00	Stack O2 Analyzer	
2:00	5.77	240.74	0.00	0.00	673.70	72.72	26.02	1.03	1.81	0.62	8.48	14.74	18.53	10.64	9.00	9.03	20.41	0.00	0.00	span value	21.39
3:00	5.54	240.40	0.00	0.00	677.79	71.84	26.20	1.04	1.82	0.62	8.53	14.73	18.98	10.95	9.00	9.00	20.41	0.00	0.00	span drift %	0.23
4:00	7.07	240.40	0.00	0.00	673.72	71.11	25.65	1.03	1.82	0.62	8.46	14.77	18.83	10.81	8.98	8.99	20.44	0.00	0.00	zero value	-0.32
5:00	5.80	240.57	0.00	0.00	671.47	69.29	24.73	1.02	1.82	0.62	8.40	14.78	19.76	11.34	8.91	8.96	20.45	0.00	0.00	zero drift %	-0.32
6:00	5.77	240.74	0.00	0.00	670.10	69.86	24.95	1.03	1.82	0.62	8.53	14.79	19.66	11.28	9.05	8.98	20.45	0.00	0.00		
7:00	5.73	240.74	0.00	0.00	670.37	71.52	25.81	1.04	1.81	0.62	8.52	14.77	19.01	10.91	9.04	9.00	20.43	0.00	0.00	Nebraska Gas	0

Comments: CEMS oxygen malfunctioned on 2/25/21 7:00 AM to 2/26/21 7:00 AM, a total of 24 hours. VCAPCD was notified on 2/24/21 at 1:45 PM

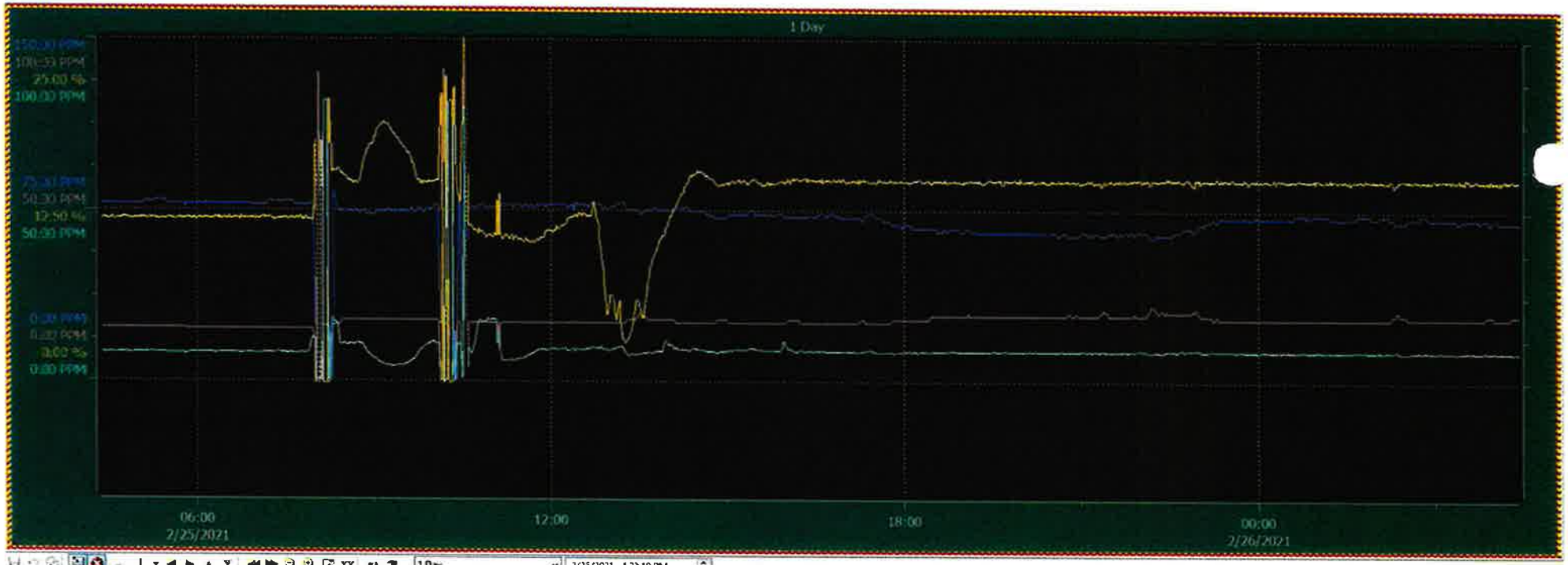
SINCE CEMS WAS NOT MEASURING CORRECTLY FOR O2, THIS REPORT REFLECTS UNCORRECTED NOX AND CO.

PRINT TIME: 3/1/2021 3:05 PM

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


RS_NOx PPM
8.63480
0931FIC1173_MV
25.75
921-2015 WQ
1.91
921-2015.FQG
2.90
931AIC1111C CO
19.7
RS_931AIC1111A NOX
71.3
931AIC1111C CCO
18.7
2/25/2021 7:00:00 AM
24.00 hours
2/26/2021 7:00:00 AM

Root/Oxnard Mill/S \rea: T-921-020-02



1 Day | 2/25/2021 4:23:19 PM

	Visible	S	T	Object	Object Name	Object Description	Propert	Log Name	Current Value	Low Range	High Range	Ruler Time	Ruler Value	Mean Value	Min Value	Max Value	Property Descri
1	☑				931AIC1111A.NOX	B&W SCR INLET NOX	VALUE	SEAMLESS	68.81 PPM	0.00 PPM	150.00 PPM	2/25/2021 2:37:36		71.24 PPM	0.56 PPM	128.69 PPM	VALUE
2	☑				931AIC1111C.CO	B&W BLR STACK RAW CO	VALUE	SEAMLESS	17.94 PPM	0.00 PPM	100.00 PPM	2/25/2021 2:37:36		17.99 PPM	-0.66 PPM	102.06 PPM	VALUE
3	☑				931AIC1111B.O2	B&W BLR RAW O2%	VALUE	SEAMLESS	12.65 %	0.00 %	25.00 %	2/25/2021 2:37:36		13.60 %	-2.68 %	25.71 %	VALUE
4	☑				931AIC1111D.NOX	B&W BLR STACK NOX	VALUE	SEAMLESS	8.91 PPM	0.00 PPM	100.00 PPM	2/25/2021 2:37:36		9.52 PPM	0.13 PPM	82.33 PPM	VALUE
5	☐				931-AIC-1111.INCAL	RSMT CEMS IN CAL	VALUE	SEAMLESS	0.00	0	1			0	0	1	VALUE
6	☐				931-aic-1111.trb	RSMT CEMS TROUBLE	VALUE	SEAMLESS	1.00	0	1			1	0	1	VALUE
7	☐																
8	☐																

2/26/2021 11:18:34 AM

DAY SHIFT OPERATOR NAME: [signature]

NIGHT SHIFT OPERATOR NAME: MH

STEAM & WATER READINGS

	PERMEATE H_2O	CONCENTRATE H_2O	LP	HP
NT	6428529	1773325	222016	1783
PREVIOUS	6416625	1767538	178440	1376

GAS & ELECTRIC READINGS

	SCG LP	TURBINE	MAXON	DUCT BURNER	MEGAWATTS
NT	0876370	0924250	4865571	167448	40926
PREVIOUS	0871030	0109890	4863960	126434	40368

NEW DEMIN TRAILER YES [x] NO [ ] | TANK 1 % | TANK 2 % | CHILLER HOURS:

AMMONIA DELIVERY YES [ ] NO [ ] | % FULL: 60% 58% | PACESETTER ON / OFF ALARM: RED [ ] YELLOW [ ] GREEN [ ]

TURBINE

		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00
FMV	%	65.50	67.44	68.56	68.50	68.81	68.19	66.9	66.6	67.5	66.9	67.06	67.3
Inlet Temp	°F	61	60	64	64	63	61	61	61	58	59	59	56
Humidity	%	11.6	11.9	9.7	14.4	21.3	21.4	50.4	54.5	30.2	20.2	20.3	24.3
Vibration (Max)	MILS	.42	.41	.47	.49	.43	.46	.46	.46	.41	.42	.42	.45
Steam Injection	#/SEC	1.81	1.81	1.88	1.88	1.88	1.88	1.81	1.81	1.81	1.81	1.81	1.81
Turbine L.O. Level	%	100	100	100	100	100	100	100	100	99	99	99	97
T54	°F	1398	1406	1415	1418	1415	1408	1396	1399	1394	1392	1394	1389

Day: BATTERIES 126.9 V | HP RECOUPE FAL | AIR INLET DIFF 2.1 IN/H2O | HP RECOUPE FAR | L.O. DIFFERENTIAL PSI | HP RECOUPE AFT

Night: BATTERIES 126.8 V | HP RECOUPE FAL | AIR INLET DIFF 2.1 IN/H2O | HP RECOUPE FAR | L.O. DIFFERENTIAL 6 PSI | HP RECOUPE AFT

ONLINE TURBINE WATER WASH YES [ ] NO [ ] | CRANK WASH YES [ ] NO [ ] > GALLONS | CONDUCTIVITY MHOS | BOILER FEED WATER PUMP OPERATION: NO.1 PUMP YES [ ] NO [ ] NO.2 PUMP YES [ ] NO [ ]

GENERATOR

		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00
Gen. Bearing Drain	°F	149	151	153	157	154	152	149	149	149	149	149	149
L.O. Supply	°F	120	121	123	126	125	123	121	126	120	126	119	119
Gen. Vibration (Max)	IPS	.36	.30	.28	.30	.32	.31	.35	.34	.35	.35	.30	.34
Tie Line	MW	10.36	10.34	10.36	10.58	10.53	10.34	10.55	10.58	10.38	10.55	10.42	10.55
Generator Voltage	KV												

Day: GEN. 1040 AMPS | GEN.VARS 6.06 MEGA VARS | FIELD 199 AMPS | FIELD VOLTS 166 V | COOLING TWR INLET F | COOLING TWR OUTLET F

Night: GEN. 1015 AMPS | GEN.VARS 1.88 MEGA VARS | FIELD 173.1 AMPS | FIELD VOLTS 141.4 V | COOLING TWR INLET 85 F | COOLING TWR OUTLET 79 F

COGEN BOILER

		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00
450 Header Temp	°F	718	718	718	718	718	718	718	717	718	718	717	718
HP Drum Level	IN	1.8	1.3	1.6	1.5	1.8	1.5	1.6	2.6	1.3	1.5	1.8	1.6
LP Drum Level	IN	1.1	1.0	1.6	0.5	0.7	1.2	1.1	1.3	1.9	.8	.4	1.3
HP Drum Pressure	PSI	475	482	482	482	482	482	482	482	482	475	475	476
LP Drum Pressure	PSI	156	150	150	158	151	151	151	156	150	150	150	152
CO	PPM	9.9	22.7	10.3	6.0	16.6	16.1	18.8	19.3	18.6	17.9	17.2	18.1
NOx	PPM	5.4	12.7	10.3	2.5	9.0	9.0	8.9	9.2	9.1	9.1	8.9	8.9
O_2	%	12.05	17.05	10.77	3.05	14.52	14.41	14.43	14.44	14.37	14.79	14.74	14.78
Hot Well Level	%	156	142	151	141	150	161	152	145	156	116	107	114

		8:00	10:00	12:00	14:00	16:00	18:00	20:00	22:00	24:00	2:00	4:00	6:00
450 Header Temp	°F	718	720	718	718	718	718	719	718	718	718	718	718
HP Drum Level	IN	1.6	1.3	1.6	1.1	1.5	1.6	1.5	.8	1.2	1.5	1.4	1.6
LP Drum Level	IN	0.7	1.5	1.3	0.6	0.9	0.9	1.0	1.2	.4	.7	1.2	1.0
HP Drum Pressure	PSI	475	482	482	482	475	482	482	482	475	475	475	476
LP Drum Pressure	PSI	150	157	150	151	151	151	151	152	150	154	152	152
CO	PPM	Man	17.3	10.0	11.8	17.9	17.4	18.9	18.5	17	18.6	19.7	19.1
NOx	PPM	144	9.9	5.6	6.8	9.0	8.6	8.8	9.2	9.0	9.8	9.6	8.9
O_2	%		14.42	11.27	11.38	14.68	15.13	14.93	14.63	14.73	15.16	15.12	15.06
Hot Well Level	%	147	145	134	136	145	152	141	143	147	116	114	114

AUTO / ON / OFF — Day: 1150 SET POINT 457 | 1103 B SET POINT 147 | DUCT BURNER | S/P — Night: 1150 SET POINT 451 | 1103 B SET POINT 447 | DUCT BURNER | S.P. 444

COMPRESSORS

		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00
Filter Separator	PSI	232	232	234	234	254	234	232	232	232	232	232	
Gas Receiver	PSI	420	420	421	419	420	419	420	426	419	419	420	

Day: Crankcase Oil Level % | Frame Oil Pressure (25–50) PSI | Temp. cooling °F T1 T2

Night: Crankcase Oil Level % 100 | Frame Oil Pressure (25–50) PSI 22.52 | Temp. cooling °F T1 T2 61

BOILER TEST RESULTS

	DAY SHIFT	NIGHT SHIFT
BOILER FEEDWATER		
pH 8.75– 9.5	9.38	9.2
Conductivity <5mmhos	6.75	6.6
Silica <20 ppb		
R.O.		
Feed TDS<1000 ppm		
Permeate TDS<10 ppm		
pH (Feed 7.5)	7.98	7.7
CONDENSATE		
HP–pH 8.5 –9.5	8.66	
Conductivity <20mmhos	2.69	
LP–pH 8.5–9.5	8.57	
Conductivity <20mmhos	3.22	
HP		
pH 9.5 – 10.5	9.49	9.6
Conductivity 75–150	135.8	138
Phosphate 5–15 ppm		
Silica <5 ppm		
Iron ppm		
LP		
pH 9.5 – 10.5	9.80	9.6
Conductivity 75 – 150	118.4	121
Phosphate 5–15 ppm		
Silica <5 ppm		
Iron ppm		
MIXED BED		
pH 6.0 – 7.5	8.28	8.1
Conductivity <1mmhos	.33	.27
Silica <10 ppb		
HP Steam Test		
Silica <20 ppb		PH: 9.3
SOFTENER		
Hardness <1.0 ppm		
Running (1 or 2)		1
STEAM TEST	PH. 8.51	
Silica <20 ppb		
PV NO.2		
HP BLOW DOWN	DAY SHIFT:	
TIME:		
	NORTH TANK	SOUTH TANK
SALT	FEET	FEET

NOTES: Demin Del.V

KEEP NOX SET POINT @ 9 PER RUDY.

2.3MCS/R:1111 MH

ACADJ 000-3011 – REV.A.A

DATE: 2-25-2021

OFFICIAL DAILY COGENERATION LOG

NEW-INDY CONTAINERBOARD
OXNARD MILL

End Time: 2/27/2021 7:00 | Start Time: 2/26/2021 7:00

DAILY ENVIRONMENTAL REPORT - Based On Raw/Uncorrected NOx and CO

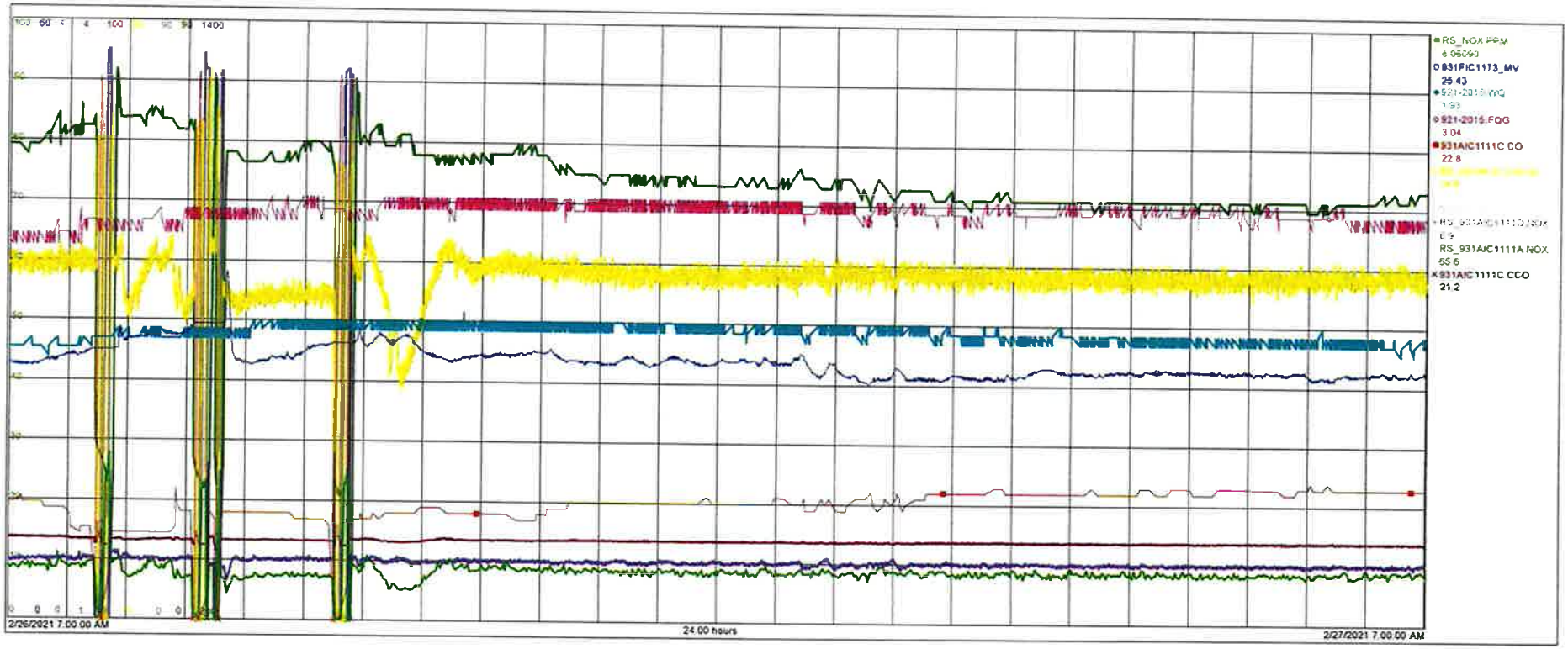
Time	Duct burner gas flow MSCFH	Turbine gas flow MSCFH	Maxon Burner gas flow MMBTU/hr	Maxon Burner gas flow SCFH	SCR Temperature °F	SCR inlet NOx ppm	Ammonia Usage lb/h	NH3:NOx mole ratio	Injection steam rate lb/s	Steam to fuel ratio lb/lb	NOx Raw/Uncorrected lb/h	Stack O2 %	Stack CO Raw/Uncorrected ppm	CO Raw/Uncorrected lb/h	Stack NOx Raw/Uncorrected ppm	3h Running Average Raw NOx	Nebraska O2 %	Nebraska NOx ppm	Nebraska Corrected NOx (ppm) (3% O_2)	Daily Av Cogen NOx lb/h	Daily Av Cog+Neb NOx lb/h
	MSCFH	MSCFH	MMBTU/hr	SCFH	°F	ppm	lb/h	mole ratio	rate lb/s	lb/lb	lb/h	%	Raw/Uncorrected ppm	lb/h	Raw/Uncorrected ppm	Average Raw NOx	%	ppm	NOx (ppm) (3% O_2)	9.41	9.41
8:00	6.75	240.74	0.00	0.00	670.39	72.10	25.78	1.03	1.82	0.62	8.52	14.82	19.23	11.04	**8.83**	**9.04**	20.40	0.00	0.00		
9:00	0.23	244.37	0.00	0.00	662.97	57.78	27.02	3.00	1.87	0.63	13.03	13.62	16.86	9.56	**13.99**	**10.69**	20.36	0.00	0.00	Daily Av Cogen	Daily Av Cog+Neb
10:00	1.25	245.69	0.00	0.00	665.25	75.04	28.52	1.09	1.89	0.63	8.52	14.27	15.32	8.77	**9.06**	**10.69**	20.36	0.00	0.00	CO	CO
11:00	6.72	246.37	1.49	1456.74	680.29	69.74	28.97	1.33	1.91	0.63	8.02	13.34	17.94	10.53	**8.32**	**10.46**	20.33	0.00	0.00	lb/h	lb/h
12:00	6.64	250.34	1.62	1753.81	681.50	69.42	28.17	1.05	1.96	0.64	8.86	13.49	17.74	10.57	**9.08**	**8.81**	20.33	0.00	0.00	12.26	12.26
13:00	6.67	251.15	1.79	1720.36	682.45	54.46	27.69	4.00	1.97	0.64	13.84	12.74	17.90	10.70	**14.10**	**10.49**	20.38	0.00	0.00	**Stack NOx analyzer**	
14:00	6.69	251.15	1.97	1898.98	683.15	72.09	27.99	1.07	1.97	0.64	8.84	13.49	17.80	10.64	**8.89**	**10.72**	20.36	0.00	0.00	zero value	0.09
15:00	6.75	252.22	2.04	1973.98	683.47	69.53	28.47	1.04	1.97	0.64	8.85	14.70	18.33	11.01	**8.97**	**10.69**	20.35	0.00	0.00	zero drift %	0.09
16:00	6.81	252.64	2.26	2187.63	683.54	70.46	28.78	1.04	1.97	0.64	8.92	14.86	17.54	10.55	**9.03**	**9.00**	20.35	0.00	0.00	span value	82.94
17:00	11.27	251.88	3.23	3102.99	690.20	67.95	26.39	1.03	1.97	0.64	8.96	14.68	19.46	11.86	**8.94**	**8.98**	20.18	0.00	0.00	span drift %	0.64
18:00	14.84	253.55	3.22	3106.71	697.28	66.71	25.12	1.03	1.97	0.64	9.18	14.55	20.06	12.49	**8.93**	**8.98**	20.31	0.00	0.00		
19:00	15.43	254.73	3.12	2994.79	700.79	66.29	25.24	1.05	1.97	0.64	9.32	14.49	20.20	12.70	**8.92**	**8.98**	20.24	0.00	0.00	**Stack CO Analyzer**	
20:00	18.59	251.96	2.84	2740.43	700.15	66.15	26.32	1.06	1.96	0.63	9.20	14.52	20.12	12.53	**8.80**	**9.00**	20.28	0.00	0.00	zero value	-0.16
21:00	14.47	252.89	1.97	1887.39	697.50	66.59	25.97	1.04	1.96	0.64	9.14	14.55	20.16	12.49	**8.98**	**9.00**	20.31	0.00	0.00	zero drift %	-0.16
22:00	11.52	252.18	1.96	1887.97	698.24	65.56	24.77	1.02	1.96	0.64	9.02	14.63	20.20	12.35	**8.98**	**8.98**	20.30	0.00	0.00	span value	91.19
23:00	12.96	251.15	3.08	2967.47	690.19	64.88	24.86	1.02	1.95	0.64	9.03	14.63	21.24	13.01	**8.98**	**8.98**	20.29	0.00	0.00	span drift %	0.09
0:00	18.13	251.15	3.18	3055.25	697.61	64.01	24.86	1.02	1.92	0.63	9.22	14.56	22.23	13.88	**8.99**	**8.98**	20.33	0.00	0.00		
1:00	22.00	250.98	3.21	3088.49	703.57	63.84	25.43	1.04	1.92	0.63	9.39	14.48	21.97	13.91	**9.03**	**9.00**	20.38	0.00	0.00	**Stack O2 Analyzer**	
2:00	21.63	251.66	3.13	3007.83	703.29	63.66	25.36	1.04	1.91	0.63	9.38	14.52	22.06	13.98	**9.01**	**9.01**	20.38	0.00	0.00	span value	20.92
3:00	21.71	251.32	3.17	3050.33	702.85	63.89	25.55	1.04	1.91	0.62	9.36	14.54	22.52	14.26	**9.00**	**9.02**	20.40	0.00	0.00	span drift %	0.01
4:00	22.02	250.98	3.15	3028.10	703.26	63.73	25.53	1.04	1.91	0.63	9.35	14.49	22.51	14.25	**8.99**	**9.00**	20.42	0.00	0.00	zero value	-2.94
5:00	21.47	251.15	3.24	3115.89	701.94	63.73	25.46	1.04	1.91	0.63	9.33	14.55	22.65	14.32	**8.99**	**8.99**	20.43	0.00	0.00	zero drift %	-2.94
6:00	20.55	250.98	3.22	3094.28	698.62	63.56	25.13	1.04	1.91	0.63	9.31	14.58	22.99	14.48	**9.00**	**8.99**	20.44	0.00	0.00		
7:00	19.14	249.98	3.22	3096.84	695.79	64.73	25.41	1.04	1.89	0.62	9.24	14.63	22.84	14.25	**9.02**	**9.00**	20.45	0.00	0.00	**Nebraska Gas**	**0**

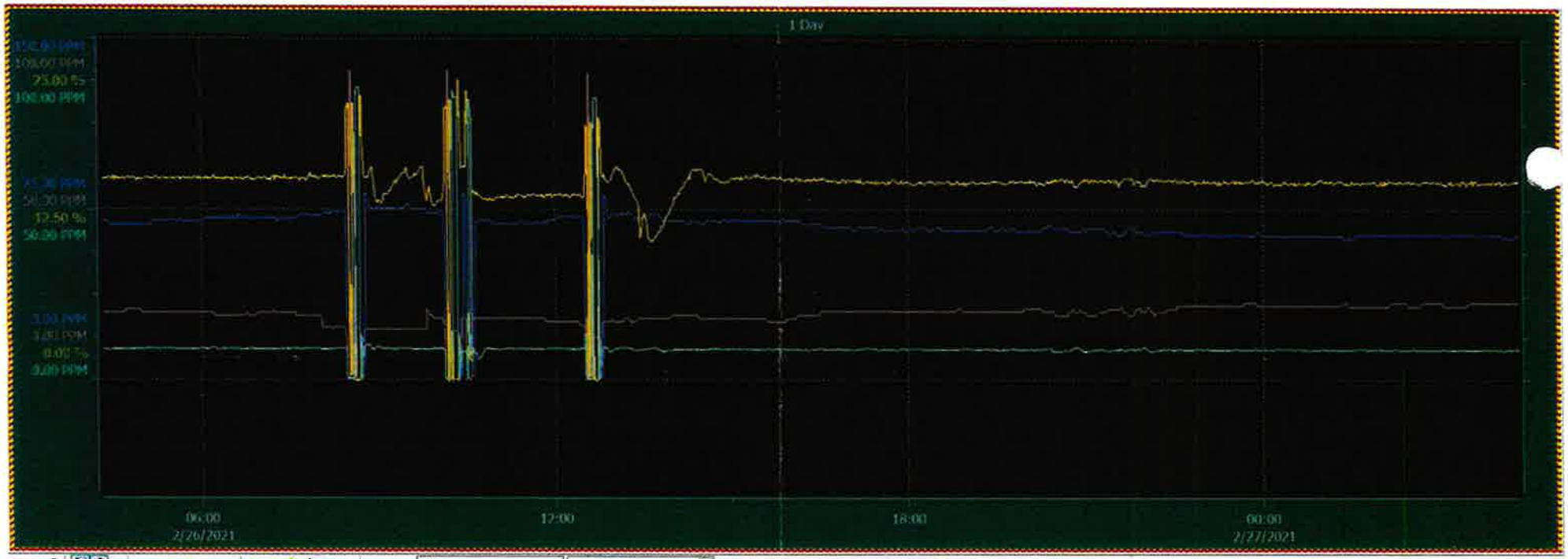
Comments: CEMS Oxygen malfunctioned from 2/26/21 7:00 AM to 2/27/21 7:00 AM, a total of 24 hours. VCAPCD was notified on 2/24/21 at 1:45 PM.

SINCE CEMS WAS NOT MEASURING CORRECTLY FOR O2, THIS REPORT REFLECTS UNCORRECTED NOX AND CO.

PRINT TIME: 3/1/2021 3:25 PM

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


RS_NOX PPM
6.06090
931FIC1173_MV
25.43
921-2015.FQG
3.04
931AIC1111C.CO
22.8
RS_931AIC1111A.NOX
55.6
931AIC1111C.CCO
21.2
2/26/2021 7:00:00 AM
24.00 hours
2/27/2021 7:00:00 AM



1 Day 2/26/2021 4:19:22 PM

	Visible	S	T	Object	Object Name	Object Description	Propert	Log Name	Current Value	Low Range	High Range	Ruler Time	Ruler Value	Mean Value	Min Value	Max Value	Property Descri
1	☑			AI	931AIC1111A.NOX	B&W SCR INLET NOX	VALUE	SEAMLESS	80.39 PPM	0.00 PPM	150.00 PPM	2/26/2021 4:09:23		65.77 PPM	1.03 PPM	82.69 PPM	VALUE
2	☑			AI	931AIC1111C.CO	B&W BLR STACK RAW CO	VALUE	SEAMLESS	16.50 PPM	0.00 PPM	100.00 PPM	2/26/2021 4:09:23		19.40 PPM	-0.19 PPM	90.99 PPM	VALUE
3	☑			AI	931AIC1111B.O2	B&W BLR RAW O2%	VALUE	SEAMLESS	7.10 %	0.00 %	25.00 %	2/26/2021 4:09:23		14.27 %	-2.66 %	21.99 %	VALUE
4	☑			AI	931AIC1111D.NOX	B&W BLR STACK NOX	VALUE	SEAMLESS	9.09 PPM	0.00 PPM	100.00 PPM	2/26/2021 4:09:23		9.72 PPM	0.09 PPM	85.70 PPM	VALUE
5	☐			DI	931-AIC-1111.INCAL	RSMT CEMS IN CAL	VALUE	SEAMLESS	0.00	0	1			0	0	1	VALUE
6	☐			DI	931-aic-1111.trb	RSMT CEMS TROUBLE	VALUE	SEAMLESS	1.00	0	1			1	1	1	VALUE
7	☐																
8	☐																

2/28/2021 11:32:00 AM

OFFICIAL DAILY COGENERATION LOG

NEW–INDY CONTAINERBOARD OXNARD MILL

DATE: 2-24-21

NIGHT SHIFT OPERATOR NAME: [illegible]

DAY SHIFT OPERATOR NAME: KOB

STEAM & WATER READINGS

	PERMEATE H_2O	CONCENTRATE H_2O	LP	HP
PRESENT	6437948	1777909	200355	1918
PREVIOUS	6428529	1773325	222016	1785

NEW DEMIN TRAILER YES ☐ NO ☐ TANK 1 % TANK 2 %

AMMONIA DELIVERY YES ☐ NO ☐ % FULL:

GAS & ELECTRIC READINGS

	SCG LP	TURBINE	MAXON	DUCT BURNER	MEGAWATTS
PRESENT	0994050	0772970	4871049	313341	41500
PREVIOUS	0876370	0434250	4865571	167448	40920

CHILLER HOURS:

PACESETTER ON / OFF ALARM: RED ☐ YELLOW ☐ GREEN ☐

TURBINE

		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00
FMV	%	66	69	72	72	72	72	72.78	72.81	70.62	72.31	71.62	71.38
Inlet Temp	°F	58	61	63	63	63	59	58	58	52	51	50	48
Humidity	%	22	23	38	38	47	62	63.8	65.8	66.5	64.9	59.8	56.0
Vibration (Max)	MILS	44	47		37	43	35	.39	.38	.42	.39	.38	.41
Steam Injection	#/SEC	1.8	1.9		2	1.9	2	2.00	2.00	1.94	1.94	1.94	1.94
Turbine L.O. Level	%	95	95		95	95	95	95	95	95	96	96	96
T54	°F	1399	1416		1432	1435	1433	1425	1429	1404	1409	1406	1398

BATTERIES V HP RECOUPE FAL

AIR INLET DIFF IN/H2O HP RECOUPE FAR

L.O. DIFFERENTIAL PSI HP RECOUPE AFT

ONLINE TURBINE WATER WASH YES ☐ NO ☐ CRANK WASH YES ☐ NO ☐ > GALLONS CONDUCTIVITY MHOS

BOILER FEED WATER PUMP OPERATION NO.1 PUMP YES ☐ NO ☐ NO.2 PUMP YES ☐ NO ☐

GENERATOR

		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00
Gen. Bearing Drain	°F	149	151		153	153	151	150	150	148	147	146	146
L.O. Supply	°F	119	121		121	121	120	120	120	118	117	117	116 V
Gen. Vibration (Max)	IPS	29	32		31	32	32	.31	.31	.30	.30	.30	.29 F
Tie Line	MW	10.5	10.4	0	10.7	10.5	10.5	10.23	10.58	10.52	10.58	10.42	10.61
Generator Voltage	KV												

GEN. AMPS GEN.VARS MEGA VARS

FIELD AMPS FIELD VOLTS V

COOLING TWR INLET F COOLING TWR OUTLET F

COGEN BOILER

		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00
450 Header Temp	°F	718	718		718	717	718	718	717	718	718	718	718
HP Drum Level	IN	1.4	1.4		1.6	1.8	1.3	1.4	0.7	2.0	1.7	1.5	1.8
LP Drum Level	IN	1	.9		1.1	1.3	1	1.4	0.5	1.1	1.5	1.2	0.8
HP Drum Pressure	PSI	4760	4760		482	482	484	482	489	489	489	482	482
LP Drum Pressure	PSI	150	150		152	154	156	156	158	156	156	156	156
CO	PPM	18.6	10.5		10.8	15.7	19.5	18.3	19.7	20.4	20.3	22.0	22.0
NOx	PPM	9	9.4		9.2	9.1	9.3	9.0	8.9	8.9	8.8	8.9	9.0
O_2	%	14.9	13.1		14.2	14.6	14.6	14.14	14.69	14.57	14.30	14.64	14.73
Hot Well Level	%	121	146		152	143	154	145	154	137	148	155	152

		8:00	10:00	12:00	14:00	16:00	18:00	20:00	22:00	24:00	2:00	4:00	6:00
450 Header Temp	°F	718	718	718	719	719	718	718	718	718	718	718	718
HP Drum Level	IN	1.5	2	1.4	1.5	2	1.2	1.5	4.3	1.0	1.6	1.7	1.2
LP Drum Level	IN	1.1	1.3	.8	1	1.2	1	0.9	2.2	0.7	1.3	1.2	1.0
HP Drum Pressure	PSI	476	482	482	482	475	489	482	468	475	489	482	482
LP Drum Pressure	PSI	150	150	152	152	152	156	156	152	152	156	156	156
CO	PPM	16.3	1	13.9	12.4	16.3	17.6	18.7	17.1	20.5	20.9	21.7	21.5
NOx	PPM	9.4	1	9.1	8.6	9.1	9.1	8.9	8.5	9.2	8.8	9.2	9.0
O_2	%	13.7		13.2	12.5	15	14.7	14.82	14.92	14.73	14.13	14.66	14.27
Hot Well Level	%	141	150	141	161	143	154	137	136	141	154	134	154

AUTO / ON / OFF

1150 SET POINT 1103 B SET POINT DUCT BURNER S/P

1150 SET POINT 1103 B SET POINT DUCT BURNER S.P.

COMPRESSORS

		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00
Filter Separator	PSI	230	230	232	232	232	230	230	230	230	230	230	230
Gas Receiver	PSI	419	419	420	419	420	420	420	420	420	421	420	420

Crankcase Oil Level %

Frame Oil Pressure (25–50) PSI

Temp. cooling °F T1 T2

BOILER TEST RESULTS

	DAY SHIFT	NIGHT SHIFT
BOILER FEEDWATER		
pH 8.75– 9.5		
Conductivity <5mmhos		
Silica <20 ppb		
R.O.		
Feed TDS<1000 ppm		
Permeate TDS<10 ppm		
pH (Feed 7.5)		
CONDENSATE		
HP–pH 8.5 –9.5		
Conductivity <20mmhos		
LP–pH 8.5–9.5		
Conductivity <20mmhos		
HP		
pH 9.5 – 10.5		
Conductivity 75–150		
Phosphate 5–15 ppm		
Silica <5 ppm		
Iron ppm		
LP		
pH 9.5 – 10.5		
Conductivity 75 – 150		
Phosphate 5–15 ppm		
Silica <5 ppm		
Iron ppm		
MIXED BED		
pH 6.0 – 7.5		
Conductivity <1mmhos		
Silica <10 ppb		
HP Steam Test		
Silica <20 ppb		
SOFTENER		
Hardness <1.0 ppm		
Running (1 or 2)		
STEAM TEST		
Silica <20 ppb		
PV NO.2		
HP BLOW DOWN	DAY SHIFT:	
TIME:		
	NORTH TANK	SOUTH TANK
SALT	FEET	FEET

NOTES: Repaired Coupling on Water Softener Booster Pump.

ACAD# 000-3011 – REV.J.4

End Time 2/28/2021 7:00 Start Time 2/27/2021 7:00

DAILY ENVIRONMENTAL REPORT - Based On Raw/Uncorrected NOx and CO

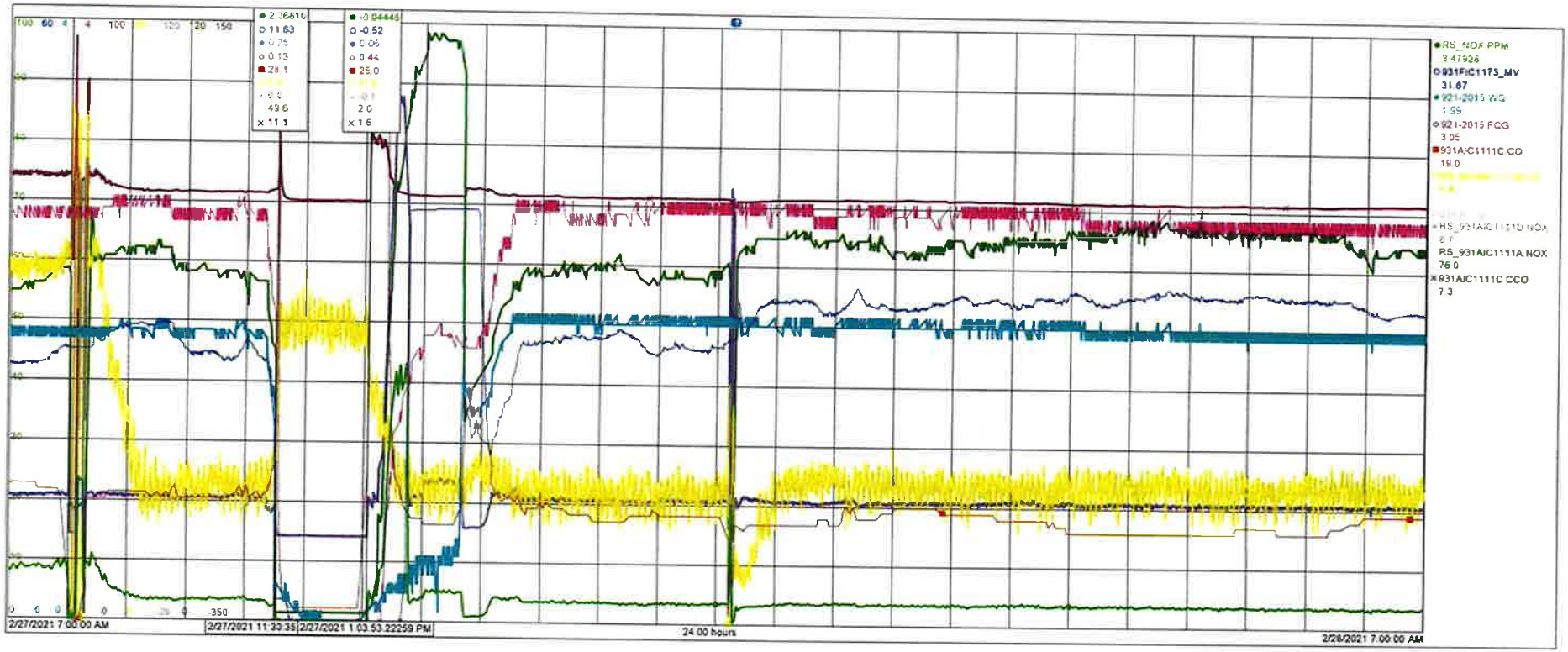
Time	Duct burner gas flow MSCFH	Turbine gas flow MSCFH	Mixon Burner gas flow MMBTU/HR	Mixon Burner gas flow SCFH	SCR Temperature °F	SCR inlet NOx ppm	Ammonia Usage lb/h	NH3:NOx mole ratio	Injection steam lb/lb	Steam to fuel ratio lb/lb	NOx Raw/Uncorrected lb/h	Stack O2 %	Stack CO Raw/Uncorrected ppm	CO Raw/Uncorrected lb/h	Stack NOx Raw/Uncorrected ppm	3h Running Average Raw NOx	Nebraska O2 %	Nebraska NOx ppm	Nebraska Corrected NOx (ppm) (3% O2)	Daily Av Cogen NOx lb/h	Daily Av Cog+Neb NOx lb/h
	MSCFH	MSCFH	MMBTU/HR	SCFH	°F	ppm	lb/h		lb/lb	lb/lb	lb/h	%	Raw/Uncorrected ppm	lb/h	Raw/Uncorrected ppm	Average Raw NOx	%	ppm	NOx (ppm) (3% O2)	8.82	8.82
8:00	14.29	250.64	3.22	3098.49	691.41	67.68	28.04	1.04	1.91	0.63	9.18	14.76	21.06	12.94	**9.09**	**9.04**	20.41	0.00	0.00		
9:00	11.47	251.32	3.23	3107.44	689.74	73.49	28.04	1.08	1.92	0.63	9.17	[illegible]	21.44	13.06	**9.16**	**9.09**	20.39	0.00	0.00	Daily Av Cogen	Daily Av Cog+Neb
10:00	8.69	251.15	2.38	2258.08	689.09	73.30	29.19	1.08	1.93	0.63	8.78	[illegible]	21.17	12.75	**8.87**	**9.04**	20.35	0.00	0.00	CO	CO
11:00	9.06	250.13	0.24	299.29	687.41	69.24	26.64	1.04	1.93	0.63	8.94	[illegible]	21.39	12.66	**9.06**	**9.03**	20.37	0.00	0.00	lb/h	lb/h
12:00	4.04	130.69	0.54	482.94	613.86	33.80	13.36	6.90	0.97	0.86	2.11	[illegible]	15.90	4.97	**4.18**	**7.34**	20.41	0.00	0.00	10.59	10.59
13:00	-0.03	10.24	0.00	0.00	499.02	1.55	-0.52	-23.61	0.01	0.20	0.00	[illegible]	2.77	0.07	**-0.07**	**4.36**	20.45	0.00	0.00	**Stack NOx analyzer**	
14:00	14.68	122.62	0.00	0.00	561.19	63.48	11.15	-5.37	0.21	0.13	19.95	[illegible]	47.67	15.20	**38.09**	**14.04**	20.44	0.00	0.00	zero value	0.03
15:00	28.00	196.14	0.00	0.00	684.96	93.35	40.94	1.57	0.79	0.32	8.19	[illegible]	21.86	11.47	**8.81**	**15.84**	20.39	0.00	0.00	zero drift %	0.03
16:00	9.44	237.09	1.14	1144.90	681.86	64.24	24.17	1.22	1.85	0.64	8.41	[illegible]	21.95	12.56	**8.95**	**18.85**	20.37	0.00	0.00	span value	82.91
17:00	8.88	251.32	3.10	2996.02	692.44	70.87	28.53	1.11	2.02	0.66	8.94	[illegible]	18.71	11.29	**8.82**	**9.16**	20.34	0.00	0.00	span drift %	0.60
18:00	7.33	250.61	2.87	2759.94	688.60	70.64	28.42	1.11	2.02	0.66	8.78	[illegible]	17.84	10.68	**8.91**	**8.96**	20.28	0.00	0.00		
19:00	6.76	253.25	2.82	2711.03	687.72	69.79	27.69	1.09	2.03	0.65	8.95	[illegible]	18.23	10.99	**9.04**	**8.99**	20.31	0.00	0.00	**Stack CO Analyzer**	
20:00	6.59	252.13	2.70	2605.22	687.82	71.48	30.37	1.38	2.02	0.65	12.03	[illegible]	15.70	9.42	**12.20**	**10.05**	20.40	0.00	0.00	zero value	-0.84
21:00	6.64	250.99	1.64	1546.39	687.05	77.86	32.21	1.15	1.99	0.65	8.77	[illegible]	17.13	10.24	**8.93**	**10.06**	20.44	0.00	0.00	zero drift %	-0.84
22:00	10.91	251.65	2.15	2108.56	693.16	76.84	32.42	1.15	2.03	0.66	9.03	[illegible]	18.51	11.27	**9.02**	**10.05**	20.42	0.00	0.00	span value	90.41
23:00	13.68	251.16	2.96	2856.15	696.00	75.63	32.16	1.14	2.01	0.65	9.13	[illegible]	19.80	12.16	**9.05**	**9.00**	20.42	0.00	0.00	span drift %	-0.77
0:00	10.52	252.66	2.83	2722.43	696.24	76.95	32.80	1.15	2.02	0.65	9.11	[illegible]	18.74	11.44	**9.09**	**9.05**	20.49	0.00	0.00		
1:00	9.49	251.32	2.70	2600.53	695.21	77.94	32.80	1.15	2.02	0.65	9.19	[illegible]	17.61	10.85	**9.25**	**9.13**	20.64	0.00	0.00	**Stack O2 Analyzer**	
2:00	6.47	251.16	2.61	2514.82	689.88	79.42	32.97	1.15	1.98	0.65	8.82	[illegible]	15.97	9.54	**8.99**	**9.11**	20.66	0.00	0.00	span value	21.58
3:00	6.48	250.78	2.57	2477.36	689.01	80.61	33.56	1.15	1.98	0.65	8.85	[illegible]	15.97	9.53	**9.03**	**9.09**	20.65	0.00	0.00	span drift %	[illegible]
4:00	7.25	248.30	2.56	2461.99	686.11	79.84	33.28	1.15	1.97	0.65	8.75	[illegible]	16.20	9.60	**8.99**	**9.00**	20.69	0.00	0.00	zero value	-0.57
5:00	7.70	248.71	2.60	2506.67	690.56	79.76	33.32	1.16	1.97	0.65	8.78	[illegible]	16.51	9.82	**8.99**	**9.00**	20.68	0.00	0.00	zero drift %	-0.57
6:00	9.25	249.15	2.64	2538.55	689.25	78.51	32.98	1.16	1.97	0.65	8.81	[illegible]	17.03	10.20	**8.95**	**8.98**	20.67	0.00	0.00		
7:00	11.46	250.47	2.63	2528.57	693.35	76.11	31.84	1.13	1.97	0.65	8.94	[illegible]	19.03	11.56	**8.96**	**8.97**	20.70	0.00	0.00	**Nebraska Gas**	**8**

Comments: CEMS Oxygen malfunctioned on 2/27/21 from 7:00 AM to 11:30 AM and from 1:03 PM to 2/28/21 7:00 AM, a total of 22.45 hours. Cogen tripped on 2/27/21 from 11:30 AM to 1:03 PM. VCAPCD was notified on 2/24/21 at 1:45 PM.

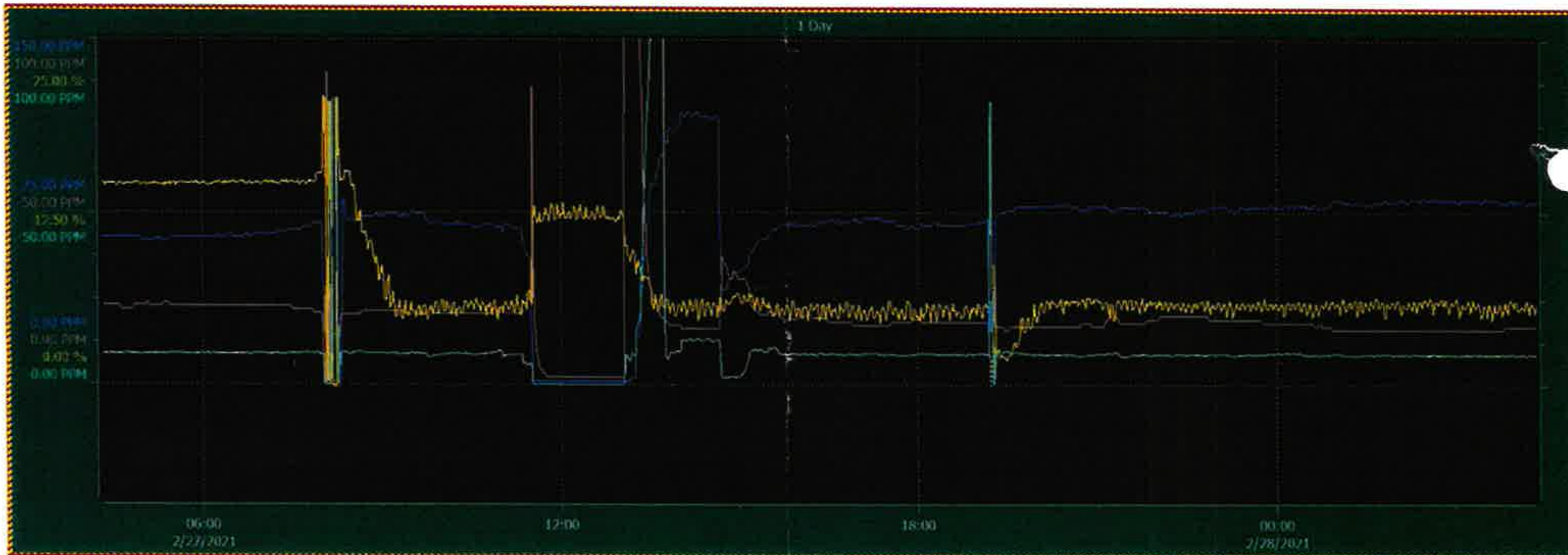
SINCE CEMS WAS NOT MEASURING CORRECTLY FOR O2, THIS REPORT REFLECTS UNCORRECTED NOX AND CO.

PRINT TIME: 3/1/2021 3:24 PM

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


RS_NOX PPM
3.47926
931FIC1173_MV
31.67
921-2015 WQ
1.95
921-2015 FQG
3.95
931AIC1111C.CO
19.0
RS_931AIC1111D.NOX
6.7
RS_931AIC1111A.NOX
76.0
931AIC1111C.CCO
7.3
2/27/2021 7:00:00 AM
2/27/2021 11:30:35
2/27/2021 1:03:53.22259 PM
24.00 hours
2/28/2021 7:00:00 AM

Root/Oxnard Mill/ſ   \rea: T-921-020-02



1 Day | 2/27/2021 4:19:22 PM

	Visible	S	T	Object	Object Name	Object Description	Propert	Log Name	Current Value	Low Range	High Range	Ruler Time	Ruler Value	Mean Value	Min Value	Max Value	Property Descri
1	☑				931AIC1111A.NOX	B&W SCR INLET NOX	VALUE	SEAMLESS	80.39 PPM	0.00 PPM	150.00 PPM	2/28/2021 4:26:02	78.98 PPM	67.76 PPM	1.08 PPM	118.17 PPM	VALUE
2	☑				931AIC1111C.CO	B&W BLR STACK RAW CO	VALUE	SEAMLESS	16.50 PPM	0.00 PPM	100.00 PPM	2/28/2021 4:26:02	17.03 PPM	19.55 PPM	-0.84 PPM	102.97 PPM	VALUE
3	☑				931AIC1111B.O2	B&W BLR RAW O2%	VALUE	SEAMLESS	6.61 %	0.00 %	25.00 %	2/28/2021 4:26:02	5.89 %	7.76 %	-0.16 %	20.85 %	VALUE
4	☑				931AIC1111D.NOX	B&W BLR STACK NOX	VALUE	SEAMLESS	9.22 PPM	0.00 PPM	100.00 PPM	2/28/2021 4:26:02	8.88 PPM	10.08 PPM	-0.11 PPM	102.97 PPM	VALUE
5	☐				931-AIC-1111.INCAL	RSMT CEMS IN CAL	VALUE	SEAMLESS	0.00	0	1			0	0	1	VALUE
6	☐				931-aic-1111.trb	RSMT CEMS TROUBLE	VALUE	SEAMLESS	1.00	0	1			1	1	1	VALUE
7	☐																
8	☐																

2/28/2021 11:31:46 AM

OFFICIAL DAILY COGENERATION LOG

NEW-INDY CONTAINERBOARD
OXNARD MILL

DATE: 2-22-21

NIGHT SHIFT OPERATOR

NAME:

DAY SHIFT OPERATOR

NAME: RDB

STEAM & WATER READINGS

	PERMEATE H_2O	CONCENTRATE H_2O_2	LP	HP	SCG LP	TURBINE
PRESENT	6447918	1782314	204910	1844	0919240	10780501
PREVIOUS	6437948	1777409	230355	1918	0994050	0772970

NEW DEMIN TRAILER YES ☐ NO ☐ TANK 1 % TANK 2 %

AMMONIA DELIVERY YES ☐ NO ☐ % FULL:

CHILLER HOURS:

PACESETTER ON / OFF ALARM: RED ☐ YELLOW ☐ GREEN ☐

TURBINE

		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00
FMV	%	70	72			61	71	73.44	70.25	70.75	71.25	71.50	70.69
Inlet Temp	°F	54	60			63	67	63	64	67	68	68	66
Humidity	%	42	27			48	37	51.4	18.9	24.1	24.0	15.7	17.3
Vibration (Max)	MILS	44	42			51	57	.48	.61	.58	.57	.61	.63
Steam Injection	#/SEC	1.8	1.9			1.7	2	2.06	2.00	2.06	2.06	2.00	1.94
Turbine L.O. Level	%	90	90			100	100	100	100	100	100	100	100
T54	°F	1408	1430			1490	1441	1441	1431	1445	1448	1444	1438
		BATTERIES V	HP RECOUPE FAL					BATTERIES 126.6 V	HP RECOUPE FAL				
		AIR INLET DIFF IN/H2O	HP RECOUPE FAR					AIR INLET DIFF 2.1 IN/H2O	HP RECOUPE FAR				
		L.O. DIFFERENTIAL PSI	HP RECOUPE AFT					L.O. DIFFERENTIAL 6 PSI	HP RECOUPE AFT				

ONLINE TURBINE WATER WASH YES ☐ NO ☐ CRANK WASH YES ☐ NO ☐ > GALLONS CONDUCTIVITY MHOS

BOILER FEED WATER PUMP OPERATION NO.1 PUMP YES ☐ NO ☐ NO.2 PUMP YES ☐ NO ☐

GENERATOR

		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00
Gen. Bearing Drain	°F	147	149			150	150	150	150	150	150	151	150
L.O. Supply	°F	117	118			120	120	120	120	120	120	121	120 V
Gen. Vibration (Max)	IPS	28	29			30	30	.33	.33	.34	.32	.32	.32 F
Tie Line	MW	10.5	10.4			10.9	11	11.98	11.14	10.95	10.62	10.98	11.05
Generator Voltage	KV												
		GEN. AMPS	GEN.VARS MEGA VARS					GEN. 1090 AMPS	GEN.VARS 2.89 MEGA VARS				
		FIELD AMPS	FIELD VOLTS V					FIELD 184 AMPS	FIELD VOLTS 152				
		COOLING TWR INLET F	COOLING TWR OUTLET F					COOLING TWR INLET F	COOLING TWR OUTLET F				

COGEN BOILER

		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00
450 Header Temp	°F	719	718			718	718	718	718	718	718	718	717
HP Drum Level	IN	1.2	1.4			1.9	1.4	1.4	4.0	1.4	1.4	1.6	1.4
LP Drum Level	IN	.9	1			.7	1.9	1.2	0.9	1.3	1.2	1.0	1.1
HP Drum Pressure	PSI	482	482			483	483	483	483	489	482	482	482
LP Drum Pressure	PSI	156	156			157	155	155	157	157	155	155	155
CO	PPM	20	12.5			7.7	6.6	6.6	6.7	8.1	6.7	6.2	6.0
NOx	PPM	9.4	9.3			8.7	9	9.1	8.9	8.7	9.1	9.2	9.9
O_2	%	14.8	10.2			6	5.7	5.6	5.8	6.17	6.33	5.30	4.78
Hot Well Level	%	151	148			132	141	148	135	151	148	139	1160
		8:00	10:00	12:00	14:00	16:00	18:00	20:00	22:00	24:00	2:00	4:00	6:00
450 Header Temp	°F	718	718			718	718	718	718	718	718	718	719
HP Drum Level	IN	1.4	1.3			1.7	1.5	1.4	2.0	1.7	1.4	1.5	1.7
LP Drum Level	IN	1	1			1.9	5	0.8	1.2	1.1	0.7	1.0	1.0
HP Drum Pressure	PSI	482	482			483	483	483	475	482	482	475	482
LP Drum Pressure	PSI	156	152			155	155	155	153	157	155	155	155
CO	PPM	114	8			6.7	7	7.0	7.7	7.5	6.1	6.8	7.7
NOx	PPM	9	9			9.2	9.2	9.1	8.9	9.1	9.2	8.6	9.0
O_2	%	10.4	5			5.5	5.3	6.55	5.68	6.43	6.39	5.93	6.57
Hot Well Level	%	148	137			136	145	139	143	153	157	146	153
AUTO / ON / OFF		1150 SET POINT	1103 B SET POINT					1150 SET POINT 415	1103 B SET POINT 447				
		DUCT BURNER	S/P					DUCT BURNER 444	S.P.				

COMPRESSORS

		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00
Filter Separator	PSI	228	228			229	229	229	231	229	231	231	231
Gas Receiver	PSI	420	420			420	420	421	420	420	420	420	420
		Crankcase Oil Level %						Crankcase Oil Level % ok					
		Frame Oil Pressure (25–50) PSI						Frame Oil Pressure (25–50) PSI 23.27					
		Temp. cooling °F T1	T2					Temp. cooling °F T1	T2				

GAS & ELECTRIC READINGS

	MAXON	DUCT BURNER	MEGAWATTS
PRESENT	48759319	229400	42007
PREVIOUS	48710491	313541	41500

BOILER TEST RESULTS

	DAY SHIFT	NIGHT SHIFT
BOILER FEEDWATER		
pH 8.75– 9.5		9.54
Conductivity <5mmhos		6.94
Silica <20 ppb		
R.O.		
Feed TDS<1000 ppm		
Permeate TDS<10 ppm		
pH (Feed 7.5)		7.78
CONDENSATE		
HP–pH 8.5 –9.5		Steam Leak
Conductivity <20mmhos		9.24
LP–pH 8.5–9.5		5.66
Conductivity <20mmhos		
HP		
pH 9.5 – 10.5		9.35
Conductivity 75–150		149.9
Phosphate 5–15 ppm		
Silica <5 ppm		
Iron ppm		
LP		
pH 9.5 – 10.5		9.56
Conductivity 75 – 150		115.2
Phosphate 5–15 ppm		
Silica <5 ppm		
Iron ppm		
MIXED BED		
pH 6.0 – 7.5		8.23
Conductivity <1mmhos		.35
Silica <10 ppb		
HP Steam Test		
Silica <20 ppb		
SOFTENER		
Hardness <1.0 ppm		
Running (1 or 2)		
STEAM TEST		pH 8.57
Silica <20 ppb		
PV NO.2		
HP BLOW DOWN	DAY SHIFT:	
TIME:		
	NORTH TANK	SOUTH TANK
SALT	FEET	FEET

NOTES: Trip @ 11:23 Start up 1:03 online @ 1:47

Added Oil to turbine it Dropped from 70 to 50% after trip?

ACADY 000-3011 – REV.14

End Time 3/1/2021 7:00 Start Time 2/28/2021 7:00

DAILY ENVIRONMENTAL REPORT - Based On Raw/Uncorrected NOx and CO

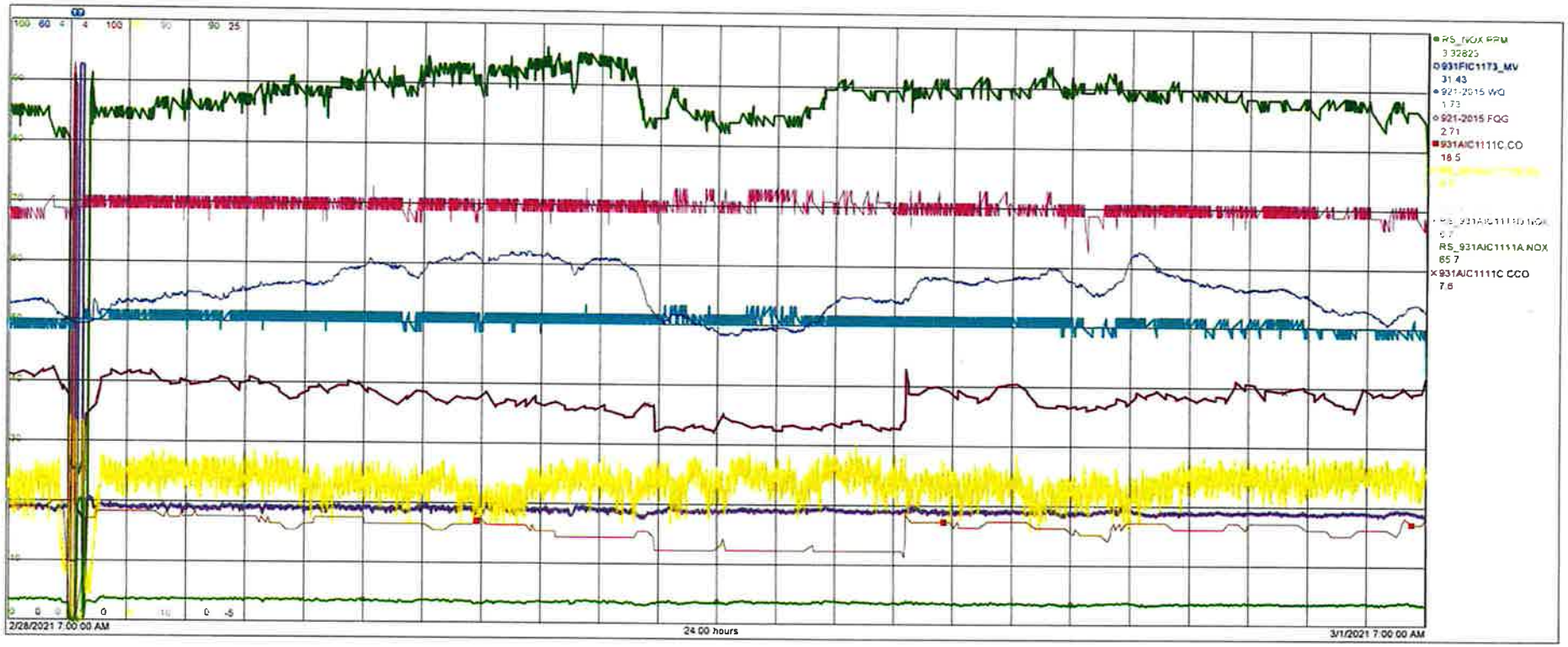
Time	Duct burner gas flow MSCFH	Turbine gas flow MSCFH	Mason Burner gas flow MMBTU/hr	Mason Burner gas flow SCFH	SCR Temperature °F	SCR Inlet NOx ppm	Ammonia Usage lb/h	NH3:NOx mole ratio	Injection steam rate lb/lb	Steam to fuel ratio lb/lb	NOx Raw/Uncorrected lb/h	Stack O2 %	Stack CO Raw/Uncorrected ppm	CO Raw/Uncorrected lb/h	Stack NOx Raw/Uncorrected ppm	3h Running Average Raw NOx	Nebraska O2 %	Nebraska NOx ppm	Nebraska Corrected NOx (ppm) (3% O2)	Daily Av Cogen NOx lb/h	Daily Av Cog+Neb NOx lb/h
																				9.02	9.02
8:00	11.61	250.98	2.62	2527.32	694.52	75.24	31.48	1.12	1.97	0.65	8.91	8.91	18.90	11.51	8.91	8.94	20.72	0.00	0.00		
9:00	12.62	252.22	0.71	679.95	694.13	76.16	30.78	1.11	2.01	0.65	9.25	9.25	18.34	11.27	9.17	9.02	20.66	0.00	0.00	Daily Av Cogen	Daily Av Cog+Neb
10:00	11.58	253.72	2.28	2173.59	696.81	76.82	32.24	1.13	2.03	0.65	9.13	9.13	18.00	11.07	9.03	9.04	20.60	0.00	0.00	CO	CO
11:00	11.98	253.32	2.17	2081.89	696.13	78.42	32.72	1.15	2.03	0.65	9.13	9.13	17.56	10.80	9.03	9.08	20.66	0.00	0.00	lb/h	lb/h
12:00	9.38	254.61	2.06	1987.51	694.96	79.50	33.71	1.14	2.03	0.65	9.10	9.10	16.52	10.12	9.05	9.04	20.63	0.00	0.00	9.76	9.76
13:00	12.63	255.25	1.96	1892.68	698.70	80.11	34.60	1.14	2.03	0.65	9.27	9.27	17.36	10.76	9.09	9.06	20.58	0.00	0.00	Stack NOx analyzer	
14:00	11.97	253.32	1.90	1828.49	700.20	81.04	35.48	1.16	2.02	0.65	9.07	9.07	16.55	10.18	8.97	9.04	20.54	0.00	0.00	zero value	-0.22
15:00	12.02	254.40	1.80	1732.71	700.08	82.67	36.37	1.17	2.03	0.65	9.20	9.20	16.24	10.04	9.07	9.04	20.48	0.00	0.00	zero drift %	-0.22
16:00	11.83	254.05	1.38	1305.91	702.15	83.00	36.73	1.19	2.03	0.65	9.15	9.15	16.29	10.04	9.03	9.02	20.49	0.00	0.00	span value	82.78
17:00	7.20	254.79	1.48	1441.63	691.77	83.96	36.21	1.18	2.03	0.66	8.97	8.97	14.70	8.93	8.99	9.03	20.36	0.00	0.00	span drift %	0.45
18:00	6.02	254.85	2.18	2107.41	688.52	80.68	34.68	1.16	2.03	0.66	8.60	8.60	14.53	8.79	8.66	8.89	20.30	0.00	0.00		
19:00	0.09	255.81	2.63	2536.12	674.51	77.02	30.33	1.09	2.05	0.66	8.70	8.70	12.33	7.32	8.93	8.86	20.24	0.00	0.00	Stack CO Analyzer	
20:00	0.09	256.44	2.58	2472.23	673.40	75.76	29.40	1.07	2.05	0.66	8.82	8.82	12.48	7.43	9.02	8.87	20.23	0.00	0.00	zero value	-0.22
21:00	0.09	256.10	2.37	2278.33	672.64	77.67	30.35	1.09	2.04	0.66	8.93	8.93	12.43	7.38	9.15	9.03	20.33	0.00	0.00	zero drift %	-0.22
22:00	0.09	256.93	2.34	2258.25	671.78	80.55	32.69	1.12	2.03	0.65	8.78	8.78	12.34	7.33	9.00	9.06	20.39	0.00	0.00	span value	93.03
23:00	10.43	254.74	2.15	2058.75	691.52	80.60	34.09	1.13	2.03	0.65	9.22	9.22	16.41	10.09	9.13	9.09	20.45	0.00	0.00	span drift %	2.11
0:00	11.15	255.08	2.17	2083.67	695.36	80.90	34.58	1.14	2.03	0.65	9.13	9.13	16.92	10.45	9.01	9.05	20.48	0.00	0.00		
1:00	11.32	255.20	2.18	2101.23	696.30	81.35	35.21	1.15	2.03	0.65	9.13	9.13	16.67	10.31	8.99	9.04	20.54	0.00	0.00	Stack O2 Analyzer	
2:00	11.88	252.73	0.51	483.84	693.88	81.06	34.23	1.14	2.00	0.65	9.21	9.21	15.78	9.68	9.14	9.04	20.54	0.00	0.00	span value	8.61
3:00	15.35	253.72	2.15	2066.62	707.64	80.41	36.06	1.18	2.03	0.65	9.09	9.09	16.99	10.60	8.87	9.00	20.54	0.00	0.00	span drift %	-13.84
4:00	10.99	252.47	2.37	2279.08	694.81	79.80	34.21	1.14	2.01	0.65	8.97	8.97	16.53	10.10	8.94	8.98	20.54	0.00	0.00	zero value	-3.13
5:00	12.38	252.86	2.09	1976.95	696.65	78.95	33.74	1.14	2.02	0.65	9.05	9.05	17.16	10.56	8.96	8.92	20.51	0.00	0.00	zero drift %	-12.50
6:00	6.93	252.00	0.00	0.00	685.39	78.74	31.94	1.12	1.96	0.65	8.80	8.80	15.83	9.50	8.82	8.94	20.54	0.00	0.00		
7:00	8.04	251.76	0.80	770.92	685.30	77.28	31.49	1.10	1.97	0.65	8.89	8.89	16.73	10.08	8.99	8.96	20.51	0.00	0.00	Nebraska Gas	0

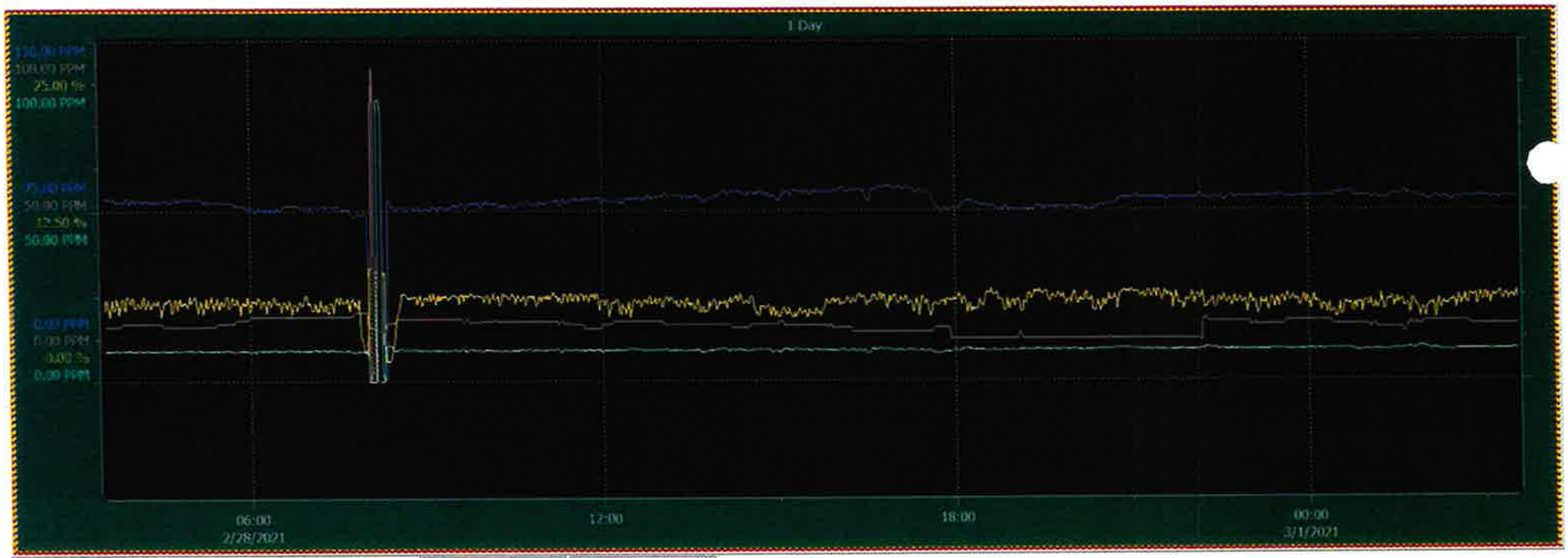
Comments: CEMS oxygen malfunctioned from 2/28/21 7:00 AM to 3/1/21 7:00 AM, a total of 24 hours. VCAPCD was notified on 2/24/21 at 1:45 PM.

SINCE CEMS WAS NOT MEASURING CORRECTLY FOR O2, THIS REPORT REFLECTS UNCORRECTED NOX AND CO.

PRINT TIME: 3/1/2021 3:07 PM

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


RS_NOX PPM
3.32825
931FIC1173_MV
31.43
921-2015 WQ
1.73
921-2015 FQG
2.71
931AIC1111C.CO
18.5
RS_931AIC1111A.NOX
65.7
931AIC1111C.CO
7.6
2/28/2021 7:00:00 AM
24.00 hours
3/1/2021 7:00:00 AM



1 Day | 2/28/2021 3:31:39 PM

	Visible	S	Tr	Object	Object Name	Object Description	Propert	Log Name	Current Value	Low Range	High Range	Ruler Time	Ruler Value	Mean Value	Min Value	Max Value	Property Descri
1	☑			AI	931AIC1111A.NOX	B&W SCR INLET NOx	VALUE	SEAMLESS	82.97 PPM	0.00 PPM	150.00 PPM	2/27/2021 9:25:25		78.85 PPM	0.70 PPM	85.73 PPM	VALUE
2	☑			AI	931AIC1111C.CO	B&W BLR STACK RAW CO	VALUE	SEAMLESS	16.72 PPM	0.00 PPM	100.00 PPM	2/27/2021 9:25:25		16.08 PPM	-0.19 PPM	92.12 PPM	VALUE
3	☑			AI	931AIC1111B.O2	B&W BLR RAW O2%	VALUE	SEAMLESS	15.62 %	0.00 %	25.00 %	2/27/2021 9:25:25		5.78 %	1.44 %	8.32 %	VALUE
4	☑			AI	931AIC1111D.NOX	B&W BLR STACK NOX	VALUE	SEAMLESS	10.31 PPM	0.00 PPM	100.00 PPM	2/27/2021 9:25:25		9.21 PPM	-0.16 PPM	62.70 PPM	VALUE
5	☐			DI	931-AIC-1111.INCAL	RSMT CEMS IN CAL	VALUE	SEAMLESS	0.00	0	1			0	0	1	VALUE
6	☐			DI	931-aic-1111.trb	RSMT CEMS TROUBLE	VALUE	SEAMLESS	1.00	0	1			1	1	1	VALUE
7	☐																
8	☐																

3/1/2021 1:08:12 PM

OFFICIAL DAILY COGENERATION LOG

NEW-INDY CONTAINERBOARD
OXNARD MILL

DATE: 3-28-2024

NIGHT SHIFT OPERATOR NAME: RDS

DAY SHIFT OPERATOR NAME: MH

STEAM & WATER READINGS

	PERMEATE H_2O	CONCENTRATE H_2O	LP	HP
CURRENT	6458451	1787343	231914	1988
PREVIOUS	6447918	1782314	204910	1844

NEW DEMIN TRAILER YES ☐ NO ☑ TANK 1 % TANK 2 %

AMMONIA DELIVERY YES ☐ NO ☑ % FULL:

GAS & ELECTRIC READINGS

	SCG LP	TURBINE	MAXON	DUCT BURNER	MEGAWATTS
CURRENT	0923410	1446840	49805934	217380	42593
PREVIOUS	0919240	1078050	48759319	224400	42007

CHILLER HOURS:

PACESETTER ON / OFF ALARM: RED ☐ YELLOW ☐ GREEN ☐

TURBINE

		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00
FMV	%	70.8	71.4	71.8	75.7	71.3	74	72	75	74	73	72	72
Inlet Temp	°F	65	61	65	64	67	64	60	58	61	62	59	57
Humidity	%	18.1	16	13.6	9.2	11.6	8.2	36	87	15	13.6	17	17
Vibration (Max)	MILS	.56	.58	.44	.47	.60	.43	.50	46	49	49	43	58
Steam Injection	#/SEC	2.00	2.00	2.06	2.04	2.00	2.06	2.06	2.06	2.06	2.06	2.04	2.06
Turbine L.O. Level	%	100	100	100	100	100	100	100	100	100	100	100	100
T54	°F	1440	1430	1442	1446	1445	1443	1440	1437	1448	1440	1430	1426

BATTERIES 127 V HP RECOUPE FAL
AIR INLET DIFF 2.3 IN/H_2O HP RECOUPE FAR
L.O. DIFFERENTIAL (PSI HP RECOUPE AFT

BATTERIES V HP RECOUPE FAL
AIR INLET DIFF IN/H_2O HP RECOUPE FAR
L.O. DIFFERENTIAL PSI HP RECOUPE AFT

ONLINE TURBINE WATER WASH YES ☐ NO ☑ CRANK WASH YES ☐ NO ☑ > GALLONS CONDUCTIVITY MHOS

BOILER FEED WATER PUMP OPERATION NO.1 PUMP YES ☑ NO ☐ NO.2 PUMP YES ☐ NO ☐

GENERATOR

		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00
Gen. Bearing Drain	°F	149	150	152	157	158	160	160	159	151	151	150	147
L.O. Supply	°F	120	124	122	127	128	129	129	128	123	122	121	120
Gen. Vibration (Max)	IPS	.30	.32	.32	.31	.32	.31	34	32	32	31	31	31
Tie Line	MW	10.89	11.02	11.20	10.94	10.97	11.11	11	10.8	11.12	11	10.9	11
Generator Voltage	KV												

GEN. 1097 AMPS GEN.VARS 2.62 MEGA VARS
FIELD 183.5 AMPS FIELD VOLTS 151.6 V
COOLING TWR INLET 86 F COOLING TWR OUTLET 80 F

GEN. AMPS GEN.VARS MEGA VARS
FIELD AMPS FIELD VOLTS V
COOLING TWR INLET F COOLING TWR OUTLET F

COGEN BOILER

		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00
450 Header Temp	°F	718	718	718	718	718	718	718	718	718	717	718	718
HP Drum Level	IN	1.2	1.5	1.5	1.2	1.5	1.5	1.6	1.6	1.7	1.8	1.6	1.6
LP Drum Level	IN	.9	1.0	1.2	1.2	.7	.5	.9	1	.7	1.3	.5	2.4
HP Drum Pressure	PSI	482	475	489	489	489	485	468	468	482	482	482	482
LP Drum Pressure	PSI	155	155	155	155	155	155	147	143	155	152	153	152
CO	PPM	7.1	7.4	7.0	6.6	6.4	5.8	5	5.2	6.8	6.3	6.6	6.8
NOx	PPM	9.2	9.0	8.7	9.5	8.2	9.2	8.8	9.2	9	8.9	8.8	8.7
O_2	%	4.68	6.45	5.71	6.37	4.86	6.57	6.4	6.4	5.5	5.4	6	8.8
Hot Well Level	%	149	155	137	156	144	148	144	157	140	137	158	153
		8:00	10:00	12:00	14:00	16:00	18:00	20:00	22:00	24:00	2:00	4:00	6:00
450 Header Temp	°F	718	718	718	718	718	717	718	718	718	719	718	718
HP Drum Level	IN	1.2	1.5	1.4	1.2	1.6	1.8	1.5	.4	1.6	.2	1.6	1.3
LP Drum Level	IN	.8	1.1	1.1	1.2	1.0	1.0	1	.8	.9	3.2	.6	.8
HP Drum Pressure	PSI	475	489	475	482	489	475	468	489	482	489	482	482
LP Drum Pressure	PSI	155	155	155	155	155	155	149	157	155	153	153	152
CO	PPM	22.3	7.0	5.9	6.5	5.8	4.5	4.9	6.4	6.9	6.7	6.9	6.6
NOx	PPM	CAL	8.8	8.7	9.3	9.1	9.0	9	9.4	9	9.2	8.5	9
O_2	%	✓	5.50	5.68	5.4	6.41	5.79	6.6	5.60	6	5.3	5	6.2
Hot Well Level	%	135	139	151	146	[illegible]	[illegible]	140	149	153	153	147	148

AUTO / ON / OFF

1150 SET POINT 451 1103 B SET POINT 447
DUCT BURNER S/P 444

1150 SET POINT 1103 B SET POINT
DUCT BURNER S.P.

COMPRESSORS

		7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	1:00	3:00	5:00
Filter Separator	PSI	231	231	231	231	231	231	231	231	231	231	231	231
Gas Receiver	PSI	420	420	420	420	421	420	420	420	419	420	421	420

Crankcase Oil Level % 100
Frame Oil Pressure (25–50) PSI 24.00
Temp. cooling °F T1 T2 65

Crankcase Oil Level %
Frame Oil Pressure (25–50) PSI
Temp. cooling °F T1 T2

BOILER TEST RESULTS

	DAY SHIFT	NIGHT SHIFT
BOILER FEEDWATER		
pH 8.75– 9.5	8.80	8.7
Conductivity <5mmhos	6.6	6.7
Silica <20 ppb		
R.O.		
Feed TDS<1000 ppm		
Permeate TDS<10 ppm		
pH (Feed 7.5)	7.7	7.8
CONDENSATE		
HP–pH 8.5 –9.5		
Conductivity <20mmhos		
LP–pH 8.5–9.5		
Conductivity <20mmhos		
HP		
pH 9.5 – 10.5	9.8	9.8
Conductivity 75–150	150	147
Phosphate 5–15 ppm		
Silica <5 ppm		
Iron ppm		
LP		
pH 9.5 – 10.5	9.6	9.8
Conductivity 75 – 150	116	120
Phosphate 5–15 ppm		
Silica <5 ppm		
Iron ppm		
MIXED BED		
pH 6.0 – 7.5	6.8	6.9
Conductivity <1mmhos	.36	.4
Silica <10 ppb		
HP Steam Test		
Silica <20 ppb	PH 8.1	
SOFTENER		
Hardness <1.0 ppm		
Running (1 or 2)	2	
STEAM TEST		
Silica <20 ppb		
PV NO.2		
HP BLOW DOWN	DAY SHIFT:	
TIME:	13:11	
	NORTH TANK	SOUTH TANK
SALT	FEET	FEET

NOTES: Chiller on @ 7:36 MH

ACAD# 000-3011 – REV.14

New-Indy Oxnard Environmental Incident Report

Shaded section to be completed by the EMR

Name of Incident CEMS Malfunction – Oxygen	Incident Date 2/24/21
Exact Location Incident Cogen MCC	
Reported By Zhen Han	Estimated Start and Stop Times of Incident: 2/24/21 10:30 – on going
Possible Cause: Controller	

Incident Type:
- ☐ Spill Internal
- ☐ Spill External
- X Air Emission
- ☐ Other_____
- ☐ Improper Waste Disposal
- ☐ Near miss or below spill release guidelines

Released To
- ☐ Storm Water System
- ☐ Process Sewer
- ☐ Ground (External)
- ☐ Near Miss
- ☐ Other_____
- ☐ Secondary Containment
- X Air
- ☐ Ground (Inside Mill Property)

Detailed Description of Event: CEMS O2 and Auto Calibration are unstable. To prevent excess emissions, ammonia addition is now controlled by the inlet raw NOx, not corrected NOx as O2 is unstable. Manually initiating calibration. Worked with Rosemount Engineering and other contractors to try and resolve with internal personnel. First field service availability from Rosemount is 3/1. Rosemount Engineering suggest control should be upgraded as this is most likely cause.

(if required use additional paper and attach)

Estimated Amount Released	pH	CONSISTENCY (%)	Estimated Monetary Loss	No. of Emergency Sandbags used	After event, Sandbags Removed/Disposed
☐ _____ Gallons ☐ _____Pounds ☐ Other_____				☐ _____ Bags ☐ N/A	☐ Yes ☐ No

List Any External Emergency Clean Up Personnel Contacted N/A	List Any External Agencies Contacted *(Agency, person and time of call.)* *VCAPCD, 2/24/21 1:45 PM*
List Hueneme Personnel Contacted *(Foreman, Mill Manager, etc.)* Robyn L., Victor K., Rudy R, James W	Any Acute or Chronic Health Risks *(refer to MSDS)* N/A

Describe Any Emergency Response Actions: Extensive troubleshooting and calls to supplier.

Suggestions to Prevent Reoccurrence	Estimated Completion Date
1. Replace CEM's controller, analyzers, and sample handling.	1. 3/26/21
2.	2.
3.	3.
4.	4.

Root Cause after investigation: Consensus: Controller is failing.	Severity Level *(level 1 and 2 must be tracked through SHIMS)* ☐ 1 ☐ 2 ☐ 3 ☐ 4
Investigated By: Lars Gustavson	Investigated Date: 2/24/21 thru present

Follow Up	By When	Completion Date	By Whom

Issued by	Reviewed by	Approved by
3/2/21		3/1/2021
Department Manager	Technical Superintendent 3/1/2021	Mill Manager

Print Time: 3/1/2021 1:34:41 PM

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

COUNTY OF VENTURA
AFFIDAVIT OF MAILING

AIR POLLUTION CONTROL DISTRICT
HEARING BOARD - PETITION NO. 889

STATE OF CALIFORNIA
County of Ventura

DECLARATION OF MAILING

I, Mia Martinez, Assistant Chief Deputy Clerk, on behalf of Michael Powers, Clerk of the Board of the County of Ventura, State of California, declare under penalty of perjury that I am not a party to the within action or proceeding, and that on the date shown below was deposited with postage prepaid, in sealed envelopes, in the United States Post Office at the City of Ventura/Interoffice Mail of the County of Ventura, a full, true and correct copy of the Emergency Variance for Petition No. 889, in the matter of New-Indy Oxnard, LLC enclosed in separate envelopes, one of which was addressed to each of the persons named below, at the address shown. Each of the addresses specified is the place of residence/business of the person, and there is a regular daily communication by the United States Mail/Interoffice Mail of the County of Ventura between the place of mailing and the place so addressed.

Dated and executed at Ventura, California, on March 10, 2021.

MICHAEL POWERS,
Clerk of the Board of the County of Ventura and
Clerk of the Air Pollution Control District Hearing Board

By:_____
Assistant Chief Deputy Clerk of the
Air Pollution Control District Hearing Board

Dr. Laki Tisopulos, Air Pollution Control District - Interoffice Brown Mail

Eric Walts, Assistant County Counsel - Interoffice Brown Mail

Jaclyn Smith, Assistant County Counsel - Interoffice Brown Mail

Michael Stubblefield
1230 East Collins Street
Oxnard, CA 93030-1805

Stephen Hurlock
3426 Lathrop Avenue
Simi Valley, CA 93063

Kathleen Paulson
160 Dana Pointe Ave.
Ventura, CA 93004

Petitioner
New-Indy Oxnard, LLC
5936 Perkins Road
Oxnard, CA 93033

ELECTRONIC MAIL

California Air Resource Board
Enforcement Division
Attn: Vickie Grimm

EPA - Region IX
A-3-1, Attn: Roshni Brahmbhatt

Ventura County
Air Pollution
Control District

4567 Telephone Rd
Ventura, California 93003

tel 805/303-4005
fax 805/456-7797
www.vcapcd.org

Dr. Laki Tisopulos, P.E.
Air Pollution Control Officer

March 10, 2021

Victor Kumpera
New-Indy Oxnard, LLC
5936 Perkins Road
Oxnard, CA 93033

INVOICE HB0889 - 01

Ventura County Air Pollution Control District
Hearing Board

Petition No.: 0889 Hearing Date(s): February 26, 2021

Rule No(s).: 103

Equipment: Continuous Emissions Monitoring System

Hearing Type: Emergency

Hearing Fees

Hearing fee:	$866.43	
Filing fee:	($100.00)	Paid: February 26, 2021
TOTAL AMOUNT DUE:	**$766.43**	

Please remit a check for the amount shown above, payable to Ventura County Air Pollution Control District, on or before: April 12, 2021

Rule 41.A.2, Hearing Board Fees, requires that a petitioner pay a fee based on the cost of holding the hearing to consider the matter specified in the petition. The fees include costs for Hearing Board members (1 member was present at the Hearing), the Hearing Board Clerk and District staff time for case preparation.

Thank you for your cooperation in this matter. If you have any questions, please contact Ms. Michelle Wood at (805) 303-3703.

cc: Fiscal Services

NEW INDY CONTAINERBOARD

February 26, 2021

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

Attention: Michelle Wood, Compliance Supervisor & Mutual Settlement

Subject: Petition for Emergency Variance

Dear Ms. Wood:

New-Indy Oxnard, LLC is filing the attached petition for emergency variance. We are seeking emergency variance from Rule 103 (Stack Monitoring) for the 29 MW gas turbine-based cogeneration unit (PTO # 00157). A filling fee in the amount of $100.00 is also enclosed.

If you have any questions or require any additional information, please call me at (805) 271-7279 or Robyn Lebrilla at (805) 271-7284.

Sincerely,

Victor Kumpera
Technical Manager

cc: Keith Macias, Compliance Division Manager
Ed Swede, Air Quality Engineer

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

HEARING BOARD
Ventura County Air Pollution Control District
PETITION FOR EMERGENCY VARIANCE HEARING

No. 889

Name & address of applicant or agent:	Receipt Stamp
New-Indy Oxnard, LLC 5936 Perkins Road Oxnard, CA 93033	County of Ventura MAR 08 2021 Clerk of the Board

INSTRUCTIONS

1. Assistance in filling out this form and/or developing a compliance schedule can be obtained by contacting the Compliance Section at (805) 645-1400.
2. Please type or print legibly.
3. Refer to the Air Pollution Control District Rulebook, Regulation VII and Rules 112, 113 and 123, when completing this form.
4. Enclose filing fee with application. The filing fee for an Emergency Variance is $100. Make checks payable to Ventura County APCD.
5. Petition must be signed by the petitioner or authorized agent. When the person signing is not the petitioner, the petitioner shall set forth his authority to sign.
6. Incomplete and/or unsigned petitions cannot be accepted.
7. Submit the completed petition and filing fee to the Compliance Section at the Air Pollution Control District, 669 County Square Drive, Second Floor, Ventura, CA 93003.
8. The APCD will submit the Petition to the Clerk of the Hearing Board, Ventura County Government Center, 800 South Victoria, Ventura, California 93009.
9. A copy of this form will be returned to you, stating the date, place, and time of the hearing.

For APCD Use Only

Petition Received by:

_____ _____
Air Pollution Control District Representative Date

Filing Fee: $ 100.00 Receipt No.: 98329

Notice Required: _____ Days Permit No.: _____

Contents of Petitions
Reference: Rule 112

The following information is required by District Rules and is necessary to allow the Hearing Board to make all findings required by state law. Please respond in detail. Use additional pages, as necessary.

A. Name, address and telephone number of petitioner or other person authorized to receive service of notices

Contact Name: Victor Kumpera

Company Name: New-Indy Oxnard, LLC

Address: 5936 Perkins Road, Oxnard, CA 93033

Phone Number: (805) 271-7279 Email Address: victor.kumpera@new-indycb.com

Cell Number: (805) 443-6075 FAX Number: (805) 488-5186

B. Name, address and telephone number of person or company who owns the equipment or source of emissions involved in this petition, if different than above.

Name:

Company Name: New-Indy Oxnard, LLC

Address: 5936 Perkins Road, Oxnard, CA 93033

Phone Number: (805) 986-3881 Email Address:

Cell Number: (805) 443-6075 FAX Number: (805) 488-5186

C. The person who owns the emission source involved in the petition is (select one):

☐ Individual ☐ Co-Partnership ☐ Corporation

☐ Public Agency ☐ Essential Public Agency ☐ Small Business (see note)

☑ Other (specify): Limited Liability Company – New-Indy Oxnard

Note: Small Business has the same meaning as defined by the Small Business Administration, and emits 10 tons or less per year of air contaminants. Contact District staff for further information.

Names and addresses of partners or officers:

Daniel Kraft/Jonathan Kraft, One Patriot Place, Foxborough, MA. 02035

John Schwarz/Jeff Schwarz, 5505 W. 74th Street, Indianapolis, IN 46268

Type of business: Paper Mill – the mill recycles used containerboard to manufacture corrugated medium which is used for making boxes. The cogeneration unit supports the paper manufacturing process by providing electricity and steam.

Street address where emission source is located:

5936 Perkins Road, Oxnard, CA 93033

E. Purpose of petition:

☒ To request that an emergency variance be granted (30-days maximum)

F. In detail, describe the activity or emission source which is the subject of this petition; what is the product used for, and why it is necessary for the operation of a business?

The emission source is a Gas Turbine-based Cogeneration Unit consisting of:

- 290 MMBTU/hr General Electric LM-2500-PK 29 MW Natural gas-fired Turbine
- Selective catalytic reduction (SCR) and steam injection for NOx control
- 51 MMBTU/hr Coen Duct Burner, natural gas-fired

The cogeneration (cogen) unit provides the paper manufacturing process with electricity and steam for drying the paper. The remainder of electricity produced (about 50%) is sold to Southern California Edison.

G. What happened that requires you to apply for a variance?

On 2/24/21 at 10:30 AM, the continuous emission monitoring system (CEMS) for the cogen unit malfunctioned. The CEMS was not measuring correctly for oxygen (O2) [failed O2 calibrations and significant O2 drift] and the system reboots intermittently. The following corrective actions have been completed: (1) the system was checked for possible leak and moisture issues; (2) O2 sensor was replaced; and (3) a new CEMS power supply was installed. However, the CEMS continues to malfunction resulting to significant O2 drifts. After discussing the issues with the CEMS manufacturer, replacement of the unit was recommended. While the mill continues its efforts to resolve the issues with the existing CEMS unit, the mill decided to purchase a new CEMS unit. The purchase order

was placed today (PO# 8152657). The delivery of the unit is expected on or before March 16, 2021 and we hope to complete the installation by March 19, 2021. Certification of the unit will be scheduled afterwards (on or before March 30, 2021) depending on source testing company's availability. We will provide Mr. Ed Swede of VCAPCD with progress update on a weekly basis.

F. Signature of petitioner or authorized representative

(Petitioner or Representative)

2/26/21

(Date)

Technical Manager

(Title or Authority of Representative)

Petition for Emergency Variance
Reference: Rule 113

A. From what District rule(s) and section(s) is the Emergency Variance being sought?

Rule 103 "Stack Monitoring"

B. What is the length of time that is being requested for this variance? (Maximum 30 days)

30 Days

C. Why would compliance with the rule(s) be unreasonable?

Continuous stack emission monitoring requirement per Rule 103 is not possible if the CEMS unit continues to malfunction. New-Indy is requesting for continued operation of the cogen unit while it continues its efforts to resolve the CEMS malfunction and secure a new CEMS unit.

D. Describe the damage or harm that would result if immediate compliance with the rule was required. Include business closure, economic losses in dollar amounts, hardship on customers, employee layoffs, and similar matters.

Immediate compliance with Rule 103 requires shutting down the cogen unit until the CEMS malfunction is resolved or until a good operating CEMS is in place. If the cogen operation is curtailed, the mill will have to buy electricity to support the paper manufacturing process. For the steam requirement to dry paper, the Nebraska boiler can operate and produce steam, however, the paper production will be reduced by about 30%. That would mean that the mill will have to cancel customer orders and it could result in loss of business. In addition, it is counterproductive to operate the Nebraska boiler when the cogen unit is available since Nebraska boiler operation results to higher emission compared to the cogen unit.

E. What consideration has been given to curtailing the operations of the source in lieu of obtaining an emergency variance?

Curtailing the Cogen operations is not a preferred option for the mill because it increases both emissions (i.e., CO and NOx) and costs. It is a critical component of the operations as it provides electricity for the facility and supplies steam for paper drying purposes. The community also benefits from the electricity it produces.

F. What efforts will be undertaken during the period of the variance to ensure excess emissions are reduced to the maximum extent feasible?

The amount of ammonia used in the SCR system to control NOx emission is automatically controlled by the corrected NOx set point [currently at 10.5 ppm NOx (15% O2 corrected) and permit limit is 3-hr average of 12 ppm NOx (15% O2 corrected)]. Since CEMS O2 analyzer is not measuring correctly, the ammonia flow will be controlled by the raw or uncorrected stack NOx instead of corrected NOx. To ensure that there will be no excess emissions during the variance period, the operational setpoint for raw NOx will be set at 9 ppm NOx (uncorrected).

G. Describe the methods of monitoring or alternative methods that will be used, if requested by the District, to quantify and report the emission levels from the source during the period the emergency variance is in effect.

The existing CEMS currently measures valid emission data for raw NOx and CO based on successful calibration for these parameters. Since CEMS does not have valid O2 data, the NOx and CO emissions (corrected to 15% O2) can be quantified based on the average or typical O2 level during normal operating condition.

H. The Hearing Board is required to give public notice of variance hearings as the public has a right to attend and testify at such hearings. In order for the Hearing Board to hold an emergency variance hearing without the required public notice, a petitioner must present facts that will support a determination by the Board that **"good cause"** exists to hear the variance without notifying the public about the variance. What is the basis for a claim of "good cause" or why does the condition constitute a breakdown, as defined in Rule 32?

The CEMS incident on 2/24/21 constitutes a breakdown condition since the CEMS unit malfunctioned after being inspected and serviced by a third party CEMS technician on 2/22/21. The breakdown condition allows 96 hours to repair the CEMS system. New Indy was not able to repair the unit and would be in noncompliance of the CEMS requirements by Monday, March 1, 2021 or New Indy would have to shut down part of the plant which would increase both emission (NOx and CO) and costs. The CEMS malfunction was not a result of disregard of any air pollution control system regulation. New-Indy meets all the emission limits per PTO # 00157. It was not a result of improper maintenance or negligent act as New-Indy performs a regular preventive maintenance on the unit. In addition, the CEMS malfunction did not constitute a nuisance. The repair is anticipated to be made within 30 days of granting an emergency variance and is being done as expeditiously as possible.

I. Describe the corrective measures undertaken and/or to be undertaken to correct the occurrence and to prevent it from reoccurring in the future.

The whole system was inspected and checked for possible moisture issues or leak. The O2 sensor was replaced and a new CEMS power supply was installed. While New-Indy continues its efforts to resolve the CEMS malfunction of the existing unit, the mill also purchased a new CEMS unit to ensure that a reliable CEMS supports the cogen operation.

J. Is the emission source involved in this petition covered by a Permit to Operate?

☑ Yes ☐ No Permit Number: 00157

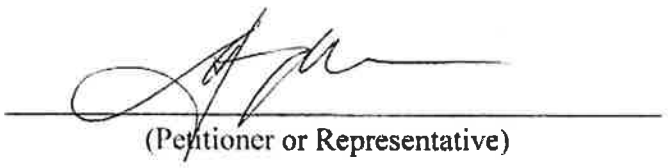
K. Permitted Emissions:

Pollutant	pounds/hour	tons/year
NOx	85.45	50.00
CO	59.65	97.66

L. Estimate the maximum excess emissions in pounds per hour and prorated tons per year which would be emitted during the variance period.

Pollutant	pounds/hour	tons/year
NOx	0	0
CO	0	0

M. Signature of petitioner or authorized representative



(Petitioner or Representative)

2/26/21

(Date)

Technical Manager

(Title or Authority of Representative)

BEFORE THE HEARING BOARD
OF THE
VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
STATE OF CALIFORNIA

In the matter of the application of:

New-Indy Oxnard, LLC
5936 Perkins Road
Oxnard, CA 93033

Facility Location:

New-Indy Oxnard, LLC
5936 Perkins Road
Oxnard, CA 93033

For a variance from:

VCAPCD Rule 103, Continuous Monitoring Systems and Violations of Part 70 Permit Number 00157 Section 6, Attachment STRMLN157-NO_X,CO,NH_3-rev241, Conditions Nos. 5 and 6

Hearing Board Case No.: 889

ORDER GRANTING
EMERGENCY VARIANCE

Granted: February 26, 2021
Effective to: March 28, 2021

On February 26, 2021, Petitioner New-Indy Oxnard, LLC. (hereinafter "New-Indy" or "Petitioner"), filed with this Hearing Board a petition for issuance of an Emergency Variance. The petitioner requested that the Hearing Board grant an emergency variance from Air Pollution Control District (hereinafter "APCD" or the "District") Rule 103, Continuous Monitoring Systems, Title V Permit 00157, Section 6, Attachment STRMLN157-NO_X,CO,NH_3-rev241, Conditions Nos. 5 and 6. Notice of the application and hearing is not required for emergency variances.

On February 26, 2021 the Chair of the Hearing Board, Mike Stubblefield, heard the petition for variance by conference call. The District was represented by Keith Macias, Compliance Division Manager and Michelle Wood, Supervising Air Quality Specialist. The Petitioner was represented by Robyn Lebrilla, Environmental Engineer
Victor Kumpera, Technical Manager, and Jeff Larson, Engineering Manager.

The Hearing Board Chair heard testimony on the "good cause" issue set forth in Section 42359.5(b). Section 42359.5(b) of the California Health and Safety Code states in part:

"An emergency variance may be issued for good cause, including, but not limited to, a breakdown condition."

The Hearing Board Chair declared the hearing closed after receiving testimony and took the matter under submission for decision. The Hearing Board Chair made the following findings of fact.

EQUIPMENT AND LOCATION

1. Petitioner is in the business of recycling used containerboard to manufacture corrugated medium which is used to make boxes. The facility is a papermill located at 5936 Perkins Road, Oxnard, CA 93033.

2. The subject equipment consists of a gas turbine-based cogeneration unit including a 290 MMBtu/hr General electric LM-2500-PK 29 MW natural gas-fired turbine, a selective catalytic reduction (SCR) and steam injection for NOx control and a 51 MMBtu/hr natural gas-fired Coen Duct Burner. The cogeneration (cogen) unit provides the paper manufacturing process with electricity and steam for drying the paper. The remainder of electricity produced (about 50%) is sold to Southern California Edison. The Operations at New-Indy are authorized by Permit to Operate No. 00157.

3. The facility turbine continuous emissions monitoring system (hereinafter "CEMS") monitors the NO_X and CO emissions from the turbine. In addition to emissions, the CEMS monitors and records turbine operating parameters including but not limited to megawatt production, fuel flow rate, stack O_2 (%), stack flow rate, steam injection rate and NH_3 injection rate.

BACKGROUND

1. On February 24, 2021 the CEMS for the cogen unit malfunctioned. The CEMS was not measuring oxygen (O_2) correctly and the system continued to intermittently reboot itself. The Petitioner took several corrective actions however the CEMS continued to malfunction resulting in significant O_2 drifts. After discussing the issues with the CEMS manufacturer, replacement of the unit was recommended.

2. Petitioner requests an emergency variance to allow continued operation of the cogen unit while the facility replaces the malfunctioning CEMS unit with a new CEMS unit.

3. Petitioner ordered a new CEMS unit on February 26, 2021 (Purchase Order# 8152657). The delivery of the new CEMS unit is expected on or before March 16,

2021 and installation is scheduled for March 19, 2021. Certification of the CEMS unit will be scheduled after installation, and it is expected that the facility will be in compliance with all Rule and Permit Condition requirements on or before March 28, 2021. Petitioner will provide a weekly progress report to Mr. Ed Swede, Engineer, VCAPCD.

RULE REQUIREMENTS AND VIOLATIONS

The operations at the facility are subject to California statutes and District Rules and Regulations. The following District Rule and Permit Conditions are applicable to this Emergency Variance:

1. District Rule 103 - Continuous Monitoring Systems. The owner or operator of an emission source required by a federal regulation to install, maintain in good working order, and operate a continuous monitoring system shall do so in accordance with the provisions of that regulation.

2. Permit 00157, Section 6, Attachment STRMLN157-NO_X,CO,NH_3-rev241,Conditions Nos. 5 and 6 require New-Indy operate and maintain CEMS, as described above, on the GE LM-2500 Turbine Cogeneration Unit.

3. New-Indy reported a breakdown of the CEMS unit on February 24, 2021 and was operating under breakdown condition as defined by District Rule 32, Breakdown Conditions; Emergency Variances.

    a. A breakdown condition means an unforeseeable failure or malfunction of any in-stack continuous monitoring equipment.

    b. For continuous monitoring equipment the period shall not persist longer than ninety-six (96) hours.

    c. An occurrence which constitutes a breakdown condition, and which persists ninety-six (96) hours, shall constitute a violation of any applicable emission limitation or restriction prescribed by these District Rules and Regulations; however, the Air Pollution Control Officer may elect to take no enforcement action if the owner or operator demonstrates the requirements in District Rule 32, C.1.

    d. Since the Petitioner believed the breakdown condition would require more than 96 hours to correct, the Petitioner, in lieu of shutdown, requested the Air Pollution Control Hearing Board to grant an emergency variance as provided for in Regulation VII and District Rule 32, C.3.

The District will be issuing a Notice of Violation for exceedances not covered by this Emergency Variance.

During the variance period, in order for the Petitioner to purchase, install and certify a new CEMS unit in replacement of the failing unit, it will be necessary to temporarily allow the Petitioner to continue operating the cogen unit with the failing CEMS unit. The replacement will be installed and certified as expeditiously as possible. The replacement installation is expected to take 30 days or less. The Petitioner expects the new unit to be installed and initially certified by March 28, 2021 and is anticipated to result in the facility meeting all rule and permit condition requirements.

Continued operation of the facility may result in violations to Permit Conditions Nos. 5 and 6 and VCAPCD Rule 103 until the CEMS has been replaced.

FINDINGS OF FACT

Pursuant to Health and Safety Code 42352, and District Rule 123, Findings, Variance or Abatement Order, the following findings have been made:

1. The petitioner is, or will be, in violation of the following: District Rule 103, Continuous Monitoring Systems and violations of Part 70 Permit Number 00157 Section 6, Attachment STRMLN157-NO_X,CO,NH_3-rev241 Conditions Nos. 5 and 6.

    a. Conditions Nos. 5 and 6 require New-Indy to install, operate and maintain turbine CEMS in accordance with 40 CFR, Part 51, Appendix P, Sections 3.0 through 3.9.5.

2. Emergency variance can be granted for "good cause." H&SC Section 42359.5

    a. "An emergency variance may be issued for good cause, including, but not limited to, a breakdown condition."

3. The increments of progress specified in this Order are reasonable.

    a. The increments of progress allow Petitioner to continue operating the cogen unit until the CEMS is replaced and has demonstrated compliance with VCAPCD Rule 103 and Permit No. 00157 Section 6, Attachment STRMLN157-NO_X,CO,NH_3-rev241 Conditions Nos. 5 and 6. They also allow the District to monitor Petitioner's progress in doing so. The increments are as expeditious as practicable (Health & Safety Code, § 42362.)

GOOD CAUSE

On February 26, 2021 New-Indy determined that the CEMS unit could not be repaired and would have to be replaced in order to maintain compliance with Title V, Permit 00157. The inability to repair the current CEMS and the necessity to order and install a new unit was unexpected and is considered a breakdown condition which an emergency variance may be issued for.

New-Indy has attempted to repair the CEMS unit in place but have been unable to do so. Continuous compliance with stack emission monitoring requirements of Rule 103 is not possible if the CEMS unit continues to malfunction. New-Indy is requesting continued operation of the cogen unit while continuing efforts to resolve the CEMS malfunction and install a new CEMS unit.

All efforts will be made to keep the CEMS in compliance with VCAPCD Rule 103 and Permit Conditions to the extent possible during this timeframe. Pollutant emissions (NO_X, CO, NH_3) in excess of the permitted allowance from the turbine are not anticipated during this process.

Immediate compliance with Rule 103 requires shutting down the cogen unit until the CEMS malfunction is resolved or until a replacement CEMS is provided. If the cogen operation is curtailed, the mill will have to buy electricity to support the paper manufacturing process. The steam requirement to dry paper would need to be provided by the Nebraska boiler in the absence of the turbine. The paper production will be reduced by about 30% due to the boiler's capacity. A shortage of production would force the cancellation of customer orders and would result in loss of business.

Petitioner will expedite the replacement of the CEMS unit as much as possible.

A nuisance as defined in District Rule 51, Nuisance, is not expected to occur as a result of this variance.

The continued operation of New-Indy during the variance is not likely to create an acute threat or hazard to public health or safety.

CONCLUSIONS AND ORDER

NOW, THEREFORE, THE HEARING BOARD ORDERS that New-Indy is granted an Emergency Variance from District Rule 103, Continuous Monitoring Systems and Violations of Part 70 Permit Number 00157 Section 6, Attachment STRMLN157-NO_X,CO,NH_3-rev241 Conditions Nos. 5 and 6. This order will be in effect until New-Indy can replace the CEMS unit to meet the Rule and permitted requirements on or before March 28, 2021, whichever occurs sooner. This variance is subject to the following conditions:

INCREMENTS OF PROGRESS

THE PETITIONER SHALL:

1. Maintain current CEMS unit as much as possible.

2. Purchase a new CEMS unit.

3. Install the new CEMS unit.

4. Certify the CEMS unit and demonstrate initial compliance with all Rule and Permit Condition requirements.

5. Achieve initial certification compliance of the CEMS unit by March 28, 2021.

REPORTING REQUIREMENTS

1. The Petitioner shall provide written progress reports every Friday to the District during the period of this Order that include:

   a. Advance notice of the date of scheduled replacement and any new equipment compliance testing.

   b. Date repair is completed.

   c. Increments of progress.

2. If a Friday is a holiday, the report shall be due on the following regular workday. Reports may be submitted by mail or email.

3. All written submittals and notifications to the District pursuant to this Variance Order shall be made to Mr. Keith Macias (keith@vcapcd.org) and Mr. Ed Swede (ed@vcapcd.org) via email or by mail to the following address: Ventura County Air Pollution Control District, 4567 Telephone Road, 2nd Floor, Ventura, CA 93003.

   a. If delay is anticipated in meeting the final compliance date in this Emergency Variance Order, the Petitioner shall notify the District in writing of the anticipated delay and the reasons for such delay. Notification is not to be misconstrued as an extension of this Variance Order.

   b. Any modification of the final compliance date of this Variance Order must be brought before the Hearing Board.

c. No later than 5 days after the date set for achievement of final compliance detailed in this Emergency Variance Order, the Petitioner shall notify the District of its compliance or non-compliance with the requirements.

GENERAL

1. Except as provided in this order, compliance with this Order shall not relieve Petitioner from liability under the District's Rules for any violation, thereof, and shall not preclude the District from pursuing remedies in accordance with the Health and Safety Code in the event of any violation.

2. The failure to abide by any condition of this decision and Order shall subject the party receiving the Variance to penalties set forth in Health and Safety Code Section 42402.

3. Each day during which a violation occurs is a separate offense.

4. Petitioner shall retain the obligation to comply with all other local, state and federal regulations not specifically referenced in this Variance Order.

5. Petitioner shall pay the Hearing Board fees specified in District Rule 41.

M Stubblefield

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
MICHAEL STUBBLEFIELD, HEARING BOARD CHAIR

3-5-21
DATE

NEW INDY
CONTAINERBOARD

March 25, 2021

Ventura County Air Pollution Control District
4567 Telephone Road, 2nd Floor
Ventura, CA 93003

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

Dear Mr. Swede:

New-Indy Oxnard is submitting this follow-up report for the call made to VCAPCD Hotline by Robyn Lebrilla on March 21, 2021 at 11:15 AM.

During daily emission review on March 21st at around 9:30 AM, it was observed that Nebraska raw NOx data did not change for several hours. The manual calibration from 9:35 AM to 10:07 AM corrected the issue and CEMS started recording valid data thereafter. We suspected that there was a signal loss or communication error between CEMS and DCS. E&I Technician will further investigate and check all wirings between CEMS and DCS. The Nebraska CEMS lost NOx data from March 20th at 8:07 PM to March 21st at 9:35 AM, a total of 13.45 hours. There was no excess emission during the event.

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

Sincerely,

Zhen Han
Process Engineer

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

Ventura County
Air Pollution

Control District

RESPONSIBLE OFFICIAL'S CERTIFICATION FORM

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

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

Air Quality Engineer
Ventura County Air Pollution Control District
4567 Telephone Road, 2nd Floor
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]	3/25/2021
Title: Mill Manager	

Start Time: 3/20/2021 7:00

Nebraska Boiler Emission Report

End Time: 3/21/2021 7:00

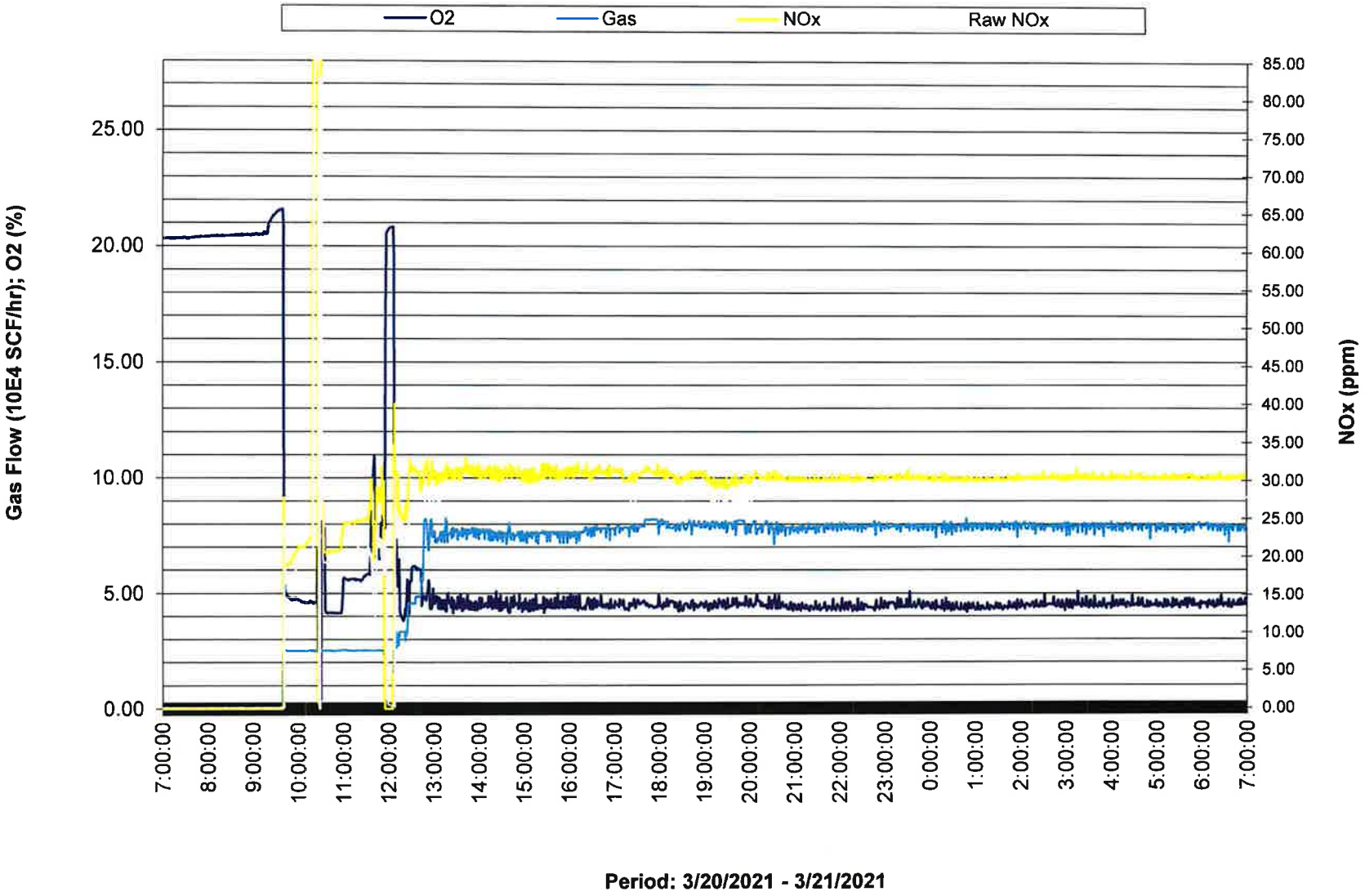
Time	Nebraska O2 % O2	Nebraska NOx ppm	Nebraska Corrected NOx, ppm (3% O2)	NOx LB/Hour	CO LB/Hour	Nebraska Gas Consumption SCFH
7:00						
7:15	20.31	0.00	0.00			
7:30	20.32	0.00	0.00			
7:45	20.33	0.00	0.00			
8:00	20.38	0.00	0.00	0.00	0	0
8:15	20.41	0.00	0.00			
8:30	20.42	0.00	0.00			
8:45	20.45	0.00	0.00			
9:00	20.47	0.00	0.00	0.00	0	0
9:15	20.49	0.00	0.00			
9:30	20.81	0.00	0.00			
9:45	15.69	5.03	5.85			
10:00	4.77	17.71	19.55	0.16	3	8718
10:15	4.64	19.45	21.41			
10:30	3.64	20.27	22.30			
10:45	5.38	20.40	21.97			
11:00	4.29	19.41	20.92	0.94	8	24936
11:15	5.60	20.80	24.33			
11:30	5.62	21.04	24.64			
11:45	7.71	18.32	24.80			
12:00	11.64	13.98	18.79	0.73	7	22905
12:15	13.04	11.47	14.41			
12:30	4.49	24.34	26.63			
12:45	5.87	26.05	31.04			
13:00	4.81	27.72	30.86	1.59	14	44907
13:15	4.60	27.77	30.49			
13:30	4.52	28.19	30.81			
13:45	4.52	28.41	31.05			
14:00	4.40	28.78	31.22	2.94	24	76041
14:15	4.53	28.30	30.94			
14:30	4.55	28.12	30.79			
14:45	4.46	28.40	30.92			
15:00	4.53	28.23	30.87	2.94	23	75560
15:15	4.41	28.08	30.48			
15:30	4.46	28.24	30.75			
15:45	4.51	28.48	31.11			
16:00	4.50	28.14	30.72	2.92	23	75495
16:15	4.54	28.42	31.09			
16:30	4.47	28.49	31.03			
16:45	4.53	28.35	31.00			
17:00	4.46	28.54	31.08	2.99	24	76963
17:15	4.51	28.42	31.04			
17:30	4.44	27.73	30.16			
17:45	4.59	28.17	30.91			
18:00	4.46	28.68	31.21	3.07	25	79302
18:15	4.52	28.28	30.90			
18:30	4.49	27.81	30.34			
18:45	4.46	27.88	30.36			
19:00	4.46	28.30	30.81	3.06	25	79455
19:15	4.47	27.73	30.20			
19:30	4.52	27.09	29.60			
19:45	4.56	27.15	29.74			
20:00	4.55	27.40	30.00	2.99	25	79637
20:15	4.61	27.70	30.43			
20:30	4.49	27.83	30.35			
20:45	4.55	27.83	30.47			
21:00	4.40	27.83	30.20	3.00	24	78321
21:15	4.38	27.83	30.16			
21:30	4.38	27.83	30.15			
21:45	4.37	27.83	30.13			
22:00	4.40	27.83	30.19	2.96	24	78263
22:15	4.45	27.83	30.29			
22:30	4.38	27.83	30.15			
22:45	4.40	27.83	30.19			
23:00	4.43	27.83	30.24	2.99	25	78907
23:15	4.53	27.83	30.43			
23:30	4.49	27.83	30.37			
23:45	4.50	27.83	30.39			
0:00	4.51	27.83	30.40	3.00	24	78802
0:15	4.42	27.83	30.22			
0:30	4.41	27.83	30.21			
0:45	4.37	27.83	30.14			
1:00	4.41	27.83	30.21	2.99	24	78834
1:15	4.35	27.83	30.11			
1:30	4.41	27.83	30.21			
1:45	4.38	27.83	30.16			
2:00	4.46	27.83	30.31	2.99	25	78998
2:15	4.48	27.83	30.35			
2:30	4.50	27.83	30.38			
2:45	4.53	27.83	30.44			
3:00	4.48	27.83	30.34	3.02	25	78913
3:15	4.52	27.83	30.41			
3:30	4.57	27.83	30.50			
3:45	4.51	27.83	30.39			
4:00	4.50	27.83	30.38	3.01	24	78784
4:15	4.53	27.83	30.43			
4:30	4.54	27.83	30.46			
4:45	4.52	27.83	30.41			
5:00	4.48	27.83	30.34	3.02	25	78967
5:15	4.50	27.83	30.38			
5:30	4.54	27.83	30.45			
5:45	4.56	27.83	30.48			
6:00	4.52	27.83	30.42	3.02	24	78829
6:15	4.54	27.83	30.44			
6:30	4.55	27.83	30.47			
6:45	4.52	27.83	30.41			
7:00	4.57	27.83	30.51	3.01	24	78759
Total Gas Usage (SCF)						**1,510,296**

Nebraska Daily Total NOx LB/day	Nebraska Daily Total CO LB/day
57.37	469.16
Nebraska Daily Average NOx LB/hour	**Nebraska Daily Average CO LB/hour**
2.39	19.55
Stack NOx analyzer	
zero value	-0.02
zero drift %	-0.02
span value	84.43
span drift %	2.51
Stack O2 analyzer	
span value	8.13
span drift %	0.52
zero value	0.40
zero drift %	0.40

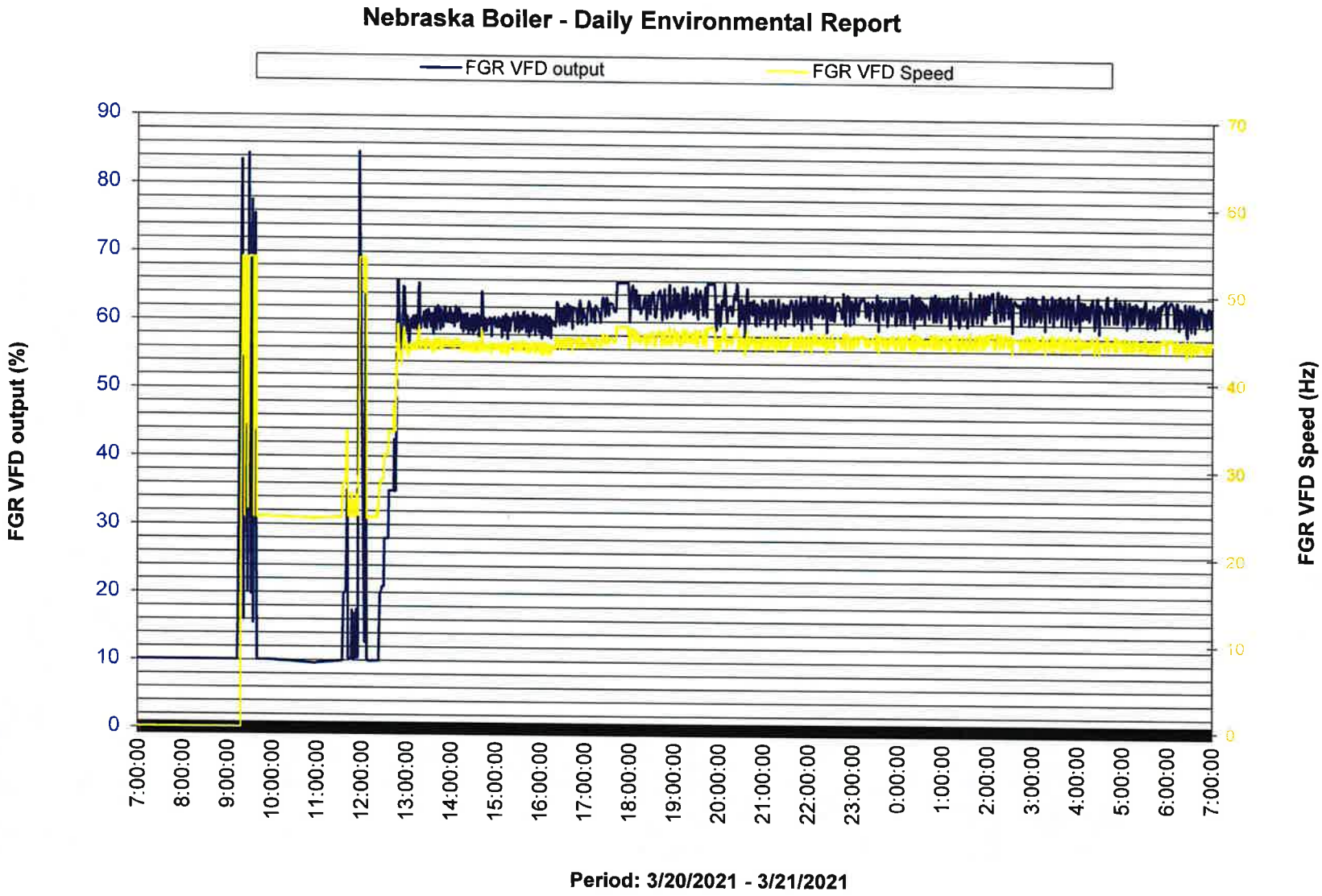
Comments: Nebraska Boiler ran to support production from 3/20/21 9:40 AM to 3/21/21 7:00 AM, a total of 21.13 hours
Raw Nox flatlined from 3/20/21 8:07 PM to 3/21/21 7:00 AM, a total of 10.88 hours. VCAPCO was notified

PRINT TIME. 3/22/2021 9.36 AM
NOTE: This document is valid for only ONE week after print time

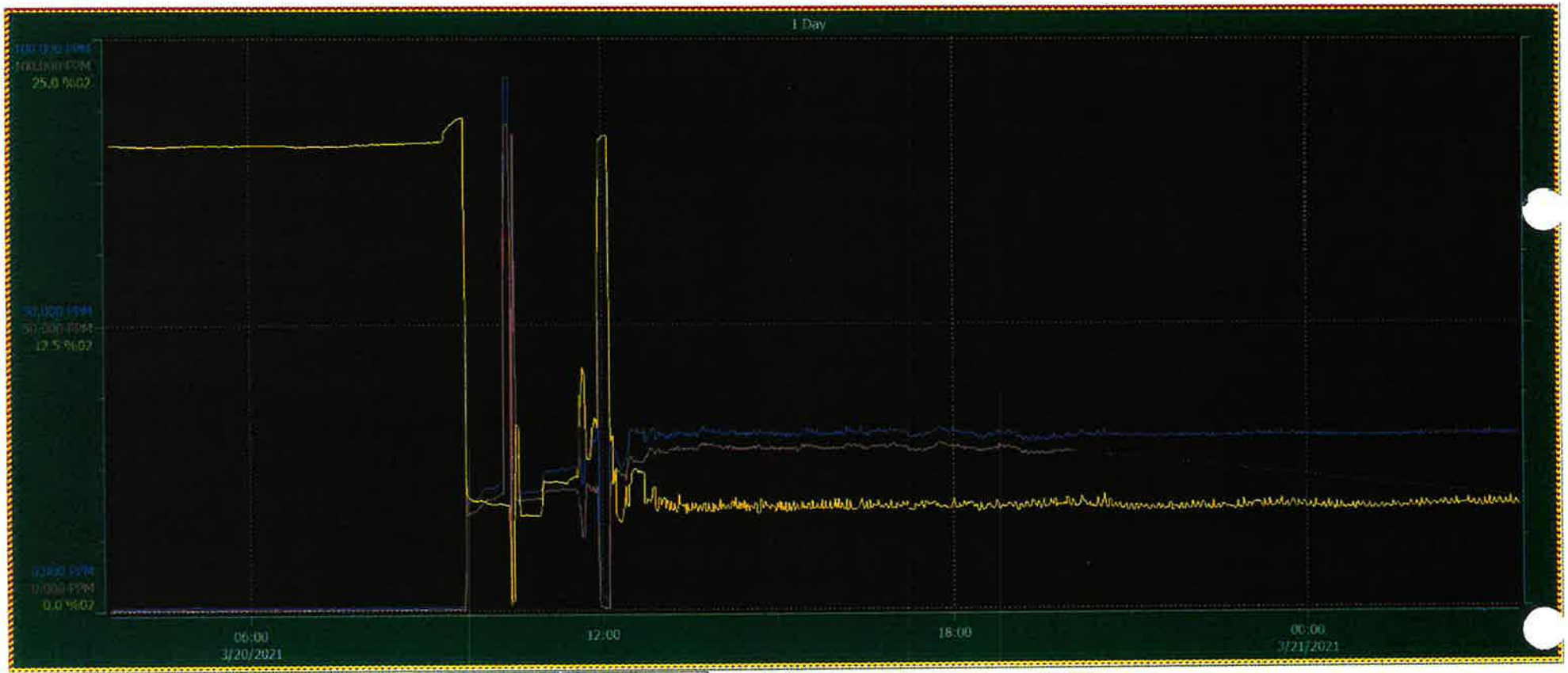
Nebraska Boiler - Daily Environmental Report



Period: 3/20/2021 - 3/21/2021


Nebraska Boiler - Daily Environmental Report
FGR VFD output
FGR VFD Speed
FGR VFD output (%)
FGR VFD Speed (Hz)
90
80
70
60
50
40
30
20
10
0
70
60
50
40
30
20
10
0
7:00:00
8:00:00
9:00:00
10:00:00
11:00:00
12:00:00
13:00:00
14:00:00
15:00:00
16:00:00
17:00:00
18:00:00
19:00:00
20:00:00
21:00:00
22:00:00
23:00:00
0:00:00
1:00:00
2:00:00
3:00:00
4:00:00
5:00:00
6:00:00
7:00:00
Period: 3/20/2021 - 3/21/2021

Root/Oxnard Mill/131 Area:T-045



1 Day | 3/20/2021 3:36:11 PM

	Visible	S	Ty	Object	Object Name	Object Description	Propert	Log Name	Current Value	Low Range	High Range	Ruler Time	Ruler Value	Mean Value	Min Value	Max Value	Property Descri
1	☑			AI	931AI391_CNOX	NEBRASKA COR NOX	VALUE	SEAMLESS	0.000 PPM	0.000 PPM	100.000 PPM	3/20/2021 3:31:12	0.505 PPM	22.356 PPM	0.365 PPM	93.381 PPM	VALUE
2	☑			AI	931AI393.AT	NEBRASKA BOILER NOX	VALUE	SEAMLESS	-0.442 PPM	0.000 PPM	100.000 PPM	3/20/2021 3:31:12	0.080 PPM	16.709 PPM	0.059 PPM	85.086 PPM	VALUE
3	☑			AI	931AI392.AT	NEBRASKA BOILER OXYGN	VALUE	SEAMLESS	19.8 %02	0.0 %02	25.0 %02	3/20/2021 3:31:12	20.3 %02	8.7 %02	0.4 %02	21.6 %02	VALUE
4	☐																
5	☐																
6	☐																
7	☐																
8	☐																

3/22/2021 3:38:23 PM

Start Time: 3/21/2021 7:00

Nebraska Boiler Emission Report

End Time: 3/22/2021 7:00

Time	Nebraska O2 % O2	Nebraska NOx ppm	Nebraska Corrected NOx, ppm (3% O2)	NOx LB/Hour	CO LB/Hour	Nebraska Gas Consumption SCFH
7:00						
7:15	4.52	27.83	30.42			
7:30	4.57	27.83	30.51			
7:45	4.53	27.83	30.44			
8:00	4.59	27.83	30.55	2.95	24	76982
8:15	4.52	27.83	30.41			
8:30	4.46	27.83	30.31			
8:45	4.46	27.83	30.31			
9:00	4.49	27.83	30.36	2.87	23	75520
9:15	4.43	27.83	30.26			
9:30	4.43	27.83	30.26			
9:45	4.02	19.43	21.07			
10:00	4.73	59.51	[illegible]	3.61	23	74943
10:15	3.63	56.64	[illegible]			
10:30	4.19	28.14	30.15			
10:45	4.18	27.83	29.79			
11:00	4.36	27.96	30.25	3.80	23	75447
11:15	4.38	27.74	30.06			
11:30	4.42	27.67	30.04			
11:45	4.50	28.35	30.94			
12:00	4.44	28.15	30.61	2.94	24	76825
12:15	4.51	28.67	31.32			
12:30	4.45	28.75	31.29			
12:45	4.47	28.50	31.05			
13:00	4.45	28.82	31.36	3.02	24	76851
13:15	4.48	29.23	31.87			
13:30	4.38	28.79	31.20			
13:45	4.44	29.06	31.61			
14:00	4.46	28.82	31.37	3.05	24	77133
14:15	4.41	28.73	31.20			
14:30	4.35	28.44	30.76			
14:45	4.37	29.03	31.43			
15:00	4.36	28.78	31.15	3.01	24	77151
15:15	4.41	28.83	31.29			
15:30	4.42	29.20	31.71			
15:45	4.42	29.22	31.74			
16:00	4.52	29.06	31.76	3.10	24	78148
16:15	4.41	28.74	31.21			
16:30	4.40	28.88	31.33			
16:45	4.41	29.03	31.51			
17:00	4.46	29.32	31.92	3.05	24	77166
17:15	4.47	29.19	31.80			
17:30	4.47	28.84	31.41			
17:45	5.78	27.75	32.98			
18:00	13.14	9.60	9.99	2.15	16	52660
18:15	20.47	0.00	0.00			
18:30	20.40	0.00	0.00			
18:45	20.37	0.00	0.00			
19:00	20.36	0.00	0.00	0.00	0	0
19:15	20.42	0.00	0.00			
19:30	20.48	0.00	0.00			
19:45	20.51	0.00	0.00			
20:00	20.54	0.00	0.00	0.00	0	0
20:15	20.56	0.00	0.00			
20:30	20.58	0.00	0.00			
20:45	20.55	0.00	0.00			
21:00	20.55	0.00	0.00	0.00	0	0
21:15	20.56	0.00	0.00			
21:30	20.55	0.00	0.00			
21:45	20.57	0.00	0.00			
22:00	20.57	0.00	0.00	0.00	0	0
22:15	20.57	0.00	0.00			
22:30	20.57	0.00	0.00			
22:45	20.58	0.00	0.00			
23:00	20.58	0.00	0.00	0.00	0	0
23:15	20.57	0.00	0.00			
23:30	20.56	0.00	0.00			
23:45	20.57	0.00	0.00			
0:00	20.56	0.00	0.00	0.00	0	0
0:15	20.56	0.00	0.00			
0:30	20.55	0.00	0.00			
0:45	20.55	0.00	0.00			
1:00	20.54	0.00	0.00	0.00	0	0
1:15	20.56	0.00	0.00			
1:30	20.58	0.00	0.00			
1:45	20.58	0.00	0.00			
2:00	20.60	0.00	0.00	0.00	0	0
2:15	20.62	0.00	0.00			
2:30	20.62	0.00	0.00			
2:45	20.63	0.00	0.00			
3:00	20.65	0.00	0.00	0.00	0	0
3:15	20.68	0.00	0.00			
3:30	20.71	0.00	0.00			
3:45	20.73	0.00	0.00			
4:00	20.75	0.00	0.00	0.00	0	0
4:15	20.75	0.00	0.00			
4:30	20.77	0.00	0.00			
4:45	20.78	0.00	0.00			
5:00	20.78	0.00	0.00	0.01	0	0
5:15	20.79	0.00	0.00			
5:30	20.79	0.00	0.00			
5:45	20.78	0.00	0.00			
6:00	20.81	0.00	0.00	0.01	0	0
6:15	20.81	0.00	0.00			
6:30	20.82	0.00	0.00			
6:45	20.86	0.00	0.00			
7:00	20.85	0.00	0.00	-0.02	0	493
Total Gas Usage (SCF)						819,318

Nebraska Daily Total NOx LB/day	Nebraska Daily Total CO LB/day
33.56	254.51
Nebraska Daily Average NOx LB/hour	**Nebraska Daily Average CO LB/hour**
1.40	10.60

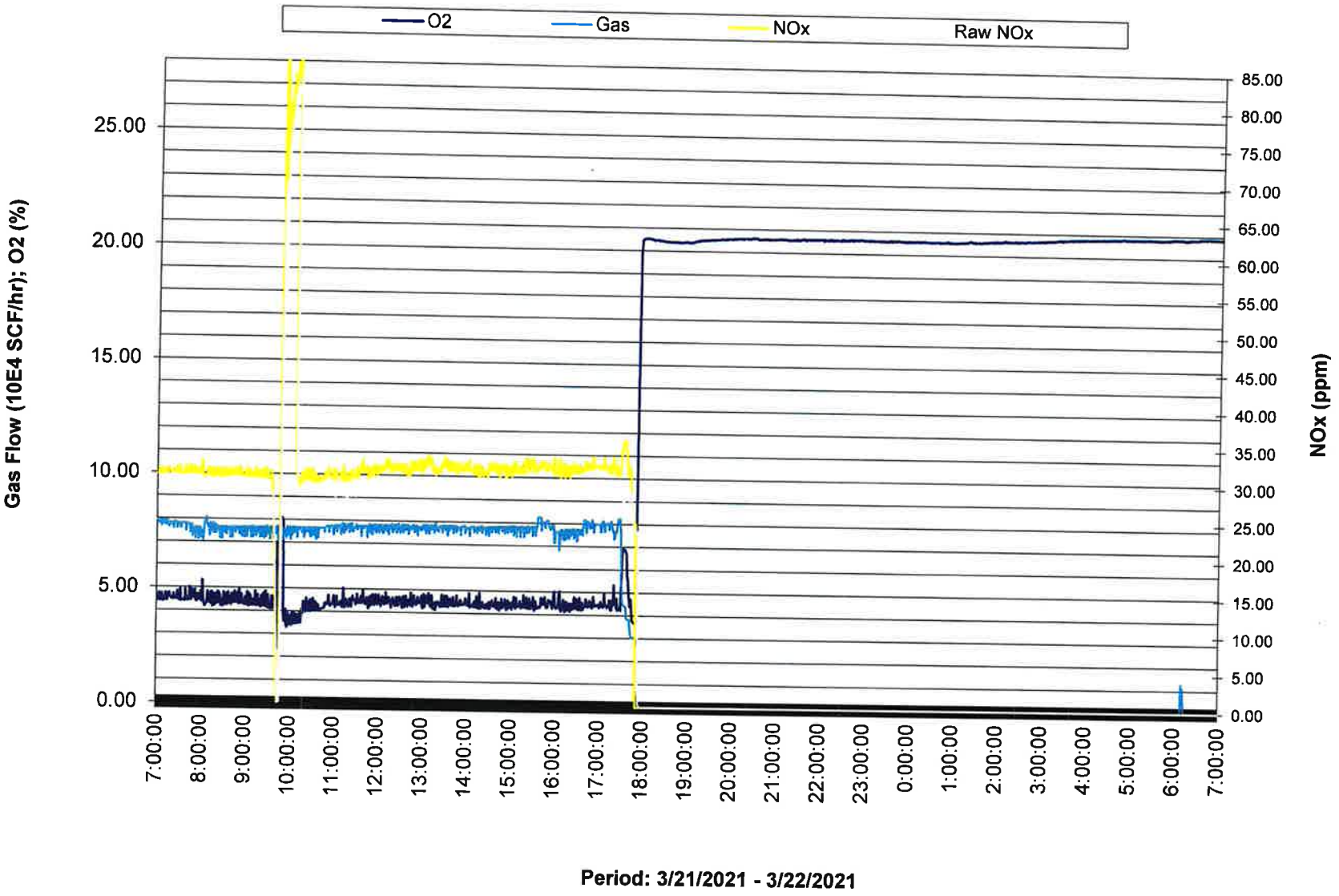
Stack NOx analyzer	
zero value	0.05
zero drift %	0.05
span value	82.85
span drift %	0.59

Stack O2 analyzer	
span value	8.09
span drift %	-0.06
zero value	0.40
zero drift %	0.40

Comments: Nebraska Boiler ran to support production on 3/21/21 from 7:00 AM to 5:51 PM, a total of 10.85 hours
Raw NOX flatlined on 3/21/21 from 7:00 AM to 9:35 AM for a total of 2.58 hours VCAPCD was notified CEMS calibration at 9:35 AM corrected the issue

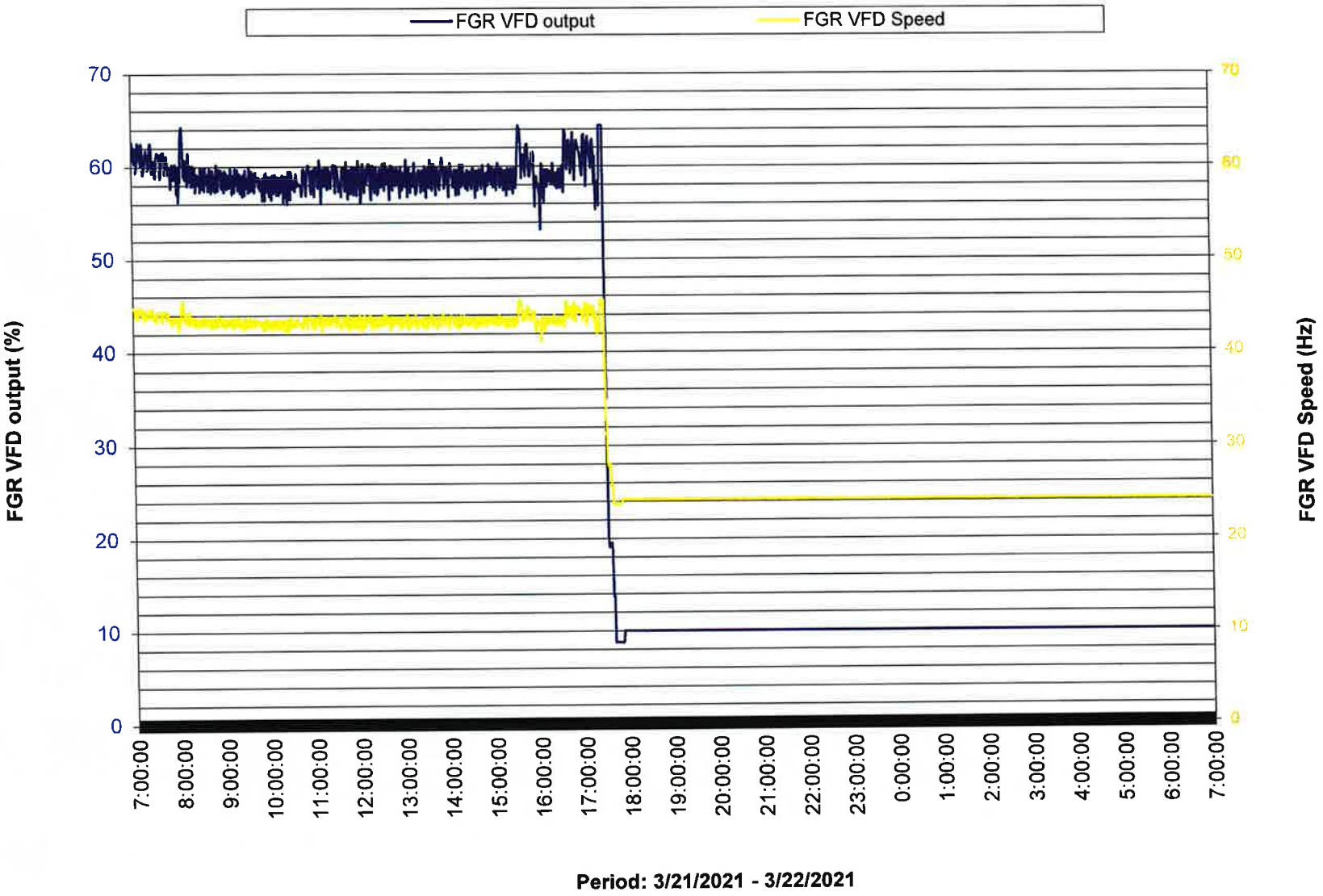
PRINT TIME: 3/22/2021 1:09 PM
NOTE: This document is valid for only ONE week after print time

Nebraska Boiler - Daily Environmental Report



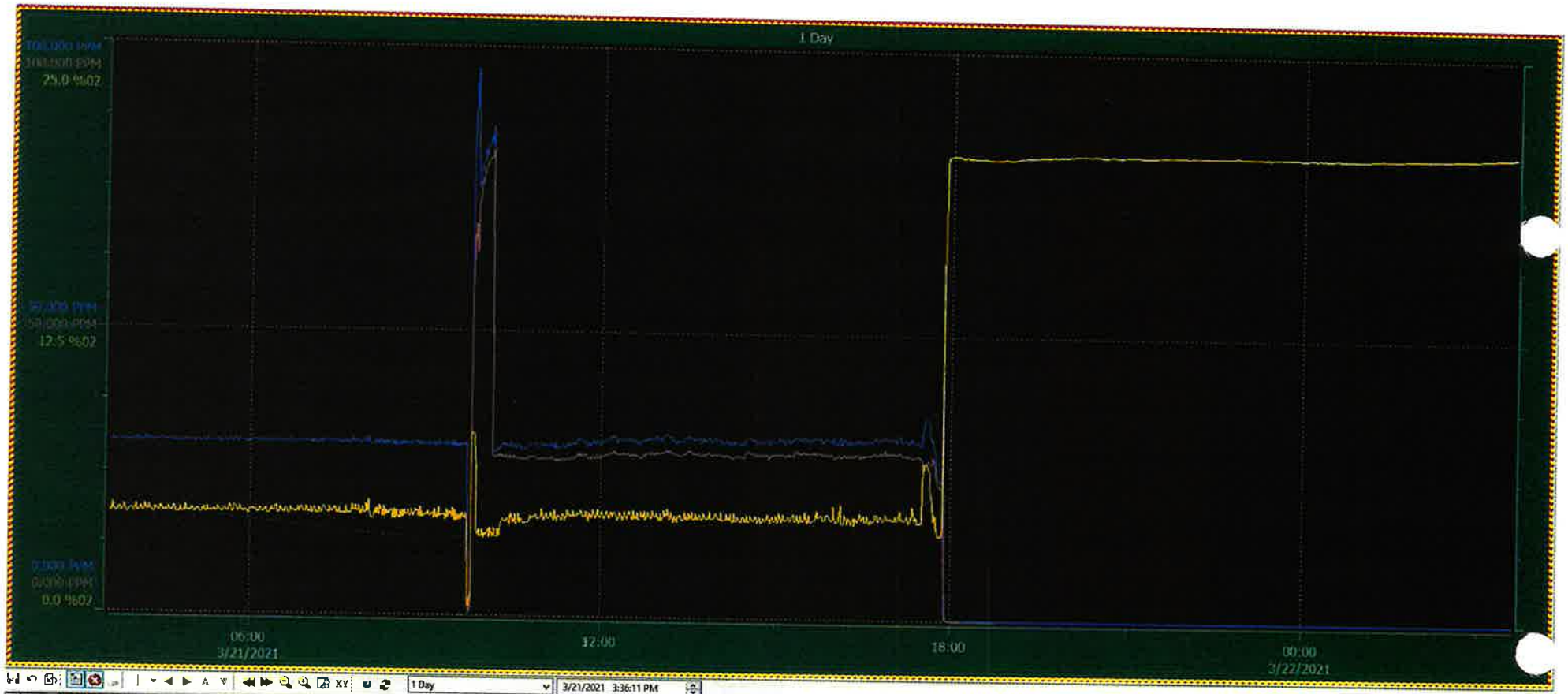
Period: 3/21/2021 - 3/22/2021

Nebraska Boiler - Daily Environmental Report



Period: 3/21/2021 - 3/22/2021

Root/Oxnard Mill/131 Area:T-045



1 Day | 3/21/2021 3:36:11 PM

	Visible	S	Tr	Object	Object Name	Object Description	Propert	Log Name	Current Value	Low Range	High Range	Ruler Time	Ruler Value	Mean Value	Min Value	Max Value	Property Descri
1	☑			AI	931AI391_CNOX	NEBRASKA COR NOX	VALUE	SEAMLESS	0.000 PPM	0.000 PPM	100.000 PPM	3/22/2021 3:43:38	0.000 PPM	19.017 PPM	0.000 PPM	96.135 PPM	VALUE
2	☑			AI	931AI393.AT	NEBRASKA BOILER NOX	VALUE	SEAMLESS	-0.442 PPM	0.000 PPM	100.000 PPM	3/22/2021 3:43:38		13.626 PPM	-0.442 PPM	81.808 PPM	VALUE
3	☑			AI	931AI392.AT	NEBRASKA BOILER OXYGN	VALUE	SEAMLESS	19.8 %02	0.0 %02	25.0 %02	3/22/2021 3:43:38	20.7 %02	11.0 %02	0.4 %02	20.7 %02	VALUE
4	☐																
5	☐																
6	☐																
7	☐																
8	☐																

3/22/2021 3:38:35 PM

Hueneme Mill Environmental Incident Report

Shaded section to be completed by the EMR

Name of Incident: No change on Nebraska CEMS stack raw NOx data	Incident Date: 3/20/21

Exact Location Incident: Nebraska Boiler

Reported By: Robyn Lebrilla	Estimated Start and Stop Times of Incident: 3/20/21 8:07 PM – 3/21/21 9:35 AM	Possible Cause: Communication fault

Incident Type

- ☐ Spill Internal
- ☐ Spill External
- ☐ Improper Waste Disposal
- ☐ Near miss or below spill release guidelines
- X Air Emission
- ☐ Other_____

Released To

- ☐ Storm Water System
- ☐ Process Sewer
- ☐ Ground (External)
- ☐ Near Miss
- ☐ Other_____
- ☐ Secondary Containment
- X Air
- ☐ Ground (Inside Mill Property)

Detailed Description of Event

During the daily emission review, it was found that the Nebraska Boiler stack raw NOx data did not change from 3/20/21 8:07 PM until 3/21/21 9:35 AM. Calibration at 9:35 AM had corrected the flatlining issue.

(if required use additional paper and attach)

Estimated Amount Released	pH	CONSISTENCY (%)	Estimated Monetary Loss
☐ _____ Gallons ☐ _____ Pounds ☐ Other_____			

List Any External Emergency Clean Up Personnel Contacted	List Any External Agencies Contacted *(Agency, person and time of call.)*
N/A	VC APCD on 3/21/21 at 11:15 AM
List Hueneme Personnel Contacted *(Foreman, Mill Manager, etc.)*	Any Acute or Chronic Health Risks *(refer to MSDS)*
Rudy Rehbein	N/A

Describe Any Emergency Response Actions
Manual calibration of CEMS

Suggestions to Prevent Reoccurrence	Estimated Completion Date
1. Check all wiring between CEM's and DCS	1. 3/31/21
2. Check with Horiba for possible causes	2 3/31/21
3.	3.
4.	4.

Root Cause after investigation: Nothing conclusive, suspect communication error.	Severity Level *(level 1 and 2 must be tracked through SHIMS)* ☐ 1 ☐ 2 ☐ 3 ☐ 4
Investigated By: Lars Gustavson	Investigated Date 3/21/21

Follow Up	By When	Completion Date	By Whom

Issued by	Reviewed by	Approved by
Department Manager 3/25/21	Technical Superintendent 3/25/21	Mill Manager

Print Time: 3/25/2021 9:06:18 AM

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

Attachment to 7.c. PO00157PC2

DATE	GAS TURBINE				COEN DUCT BURNER			MAXON BURNER					CEMS			
	Monthly (therms)	HHV	Monthly (scf)	Rolling 12-month (MMcf)	Monthly (therms)	Monthly (scf)	Rolling 12-month (MMcf)	Monthly (therms)	Monthly (scf)	Rolling 12-month (MMcf)	NOx (tons)	NOx, Rolling 12-month (tons)	Monthly CO (tons)	Monthly NOx (tons)	Rolling 12-Months CO (tons)	Rolling 12-Months NOx (tons)
Apr-19	1,222,171	1,029	118,818,880		40,205	3,908,717		8,765	852,099		0.04					
May-19	1,935,669	975	198,489,438		57,802	5,927,210		7,935	813,659		0.04					
Jun-19	1,797,484	1,013	177,424,144		27,644	2,728,678		495	48,905		0.00					
Jul-19	1,325,946	1,013	130,841,326		38,623	3,811,232		12,363	1,219,992		0.06					
Aug-19	1,949,294	1,007	193,497,518		47,391	4,704,268		6,858	680,746		0.03					
Sep-19	1,908,537	1,014	188,274,342		45,795	4,517,567		14,078	1,388,801		0.06					
Oct-19	1,424,219	909	156,645,293		39,177	4,308,959		9,199	1,011,733		0.04					
Nov-19	1,384,892	1,039	133,355,031		35,424	3,411,103		19,536	1,881,159		0.09					
Dec-19	1,937,372	1,032	187,711,656		67,226	6,513,481		16,936	1,640,879		0.08					
Jan-20	1,915,866	1,041	184,040,922		107,986	10,373,260		15,202	1,460,280		0.07					
Feb-20	1,771,859	1,041	170,207,397		120,858	11,609,780		17,356	1,667,253		0.08					
Mar-20	1,975,349	1,043	189,391,083		106,790	10,238,723		14,012	1,343,434		0.06					
Apr-20	1,868,798	1,039	179,865,063	2,090	74,898	7,208,653	75	11,854	1,140,881	14.3	0.05	0.66	5.44	3.95	57.5	42.8
May-20	1,780,101	1,032	172,490,407	2,064	70,436	6,825,148	76	10,598	1,026,912	14.5	0.05	0.67	5.05	3.79	57.8	42.8
Jun-20	1,036,141	1,022	101,383,659	1,988	38,561	3,773,048	77	9,018	882,406	15.3	0.04	0.71	3.30	2.16	56.9	41.6
Jul-20	1,620,955	1,024	158,296,387	2,015	61,981	6,052,875	80	8,688	848,445	15.0	0.04	0.69	5.02	3.38	58.1	42.1
Aug-20	1,909,530	1,026	186,114,035	2,008	72,192	7,036,262	82	6,626	645,774	14.9	0.03	0.69	5.88	3.89	58.5	42.2
Sep-20	1,799,559	1,032	174,375,872	1,994	87,495	8,478,183	86	9,700	939,961	14.5	0.04	0.67	5.69	3.71	59.1	42.1
Oct-20	1,111,880	1,030	107,949,515	1,945	63,470	6,162,103	88	12,460	1,209,674	14.7	0.06	0.68	3.65	2.32	58.9	41.6
Nov-20	1,420,913	1,040	136,626,250	1,948	56,597	5,442,020	90	19,593	1,883,899	14.7	0.09	0.68	5.64	3.02	61.1	42.0
Dec-20	1,702,898	1,040	163,740,192	1,924	84,512	8,126,167	91	16,871	1,622,232	14.7	0.08	0.68	6.05	3.58	62.2	41.7
Jan-21	1,385,228	1,039	133,323,195	1,874	77,133	7,423,800	88	18,954	1,824,281	15.0	0.09	0.70	4.01	3.15	60.5	40.8
Feb-21	1,645,299	1,039	158,354,090	1,862	87,534	8,424,802	85	15,642	1,505,483	14.9	0.07	0.69	3.83	3.37	59.2	40.5
Mar-21	1,686,212	1,037	162,604,822	1,835	64,109	6,182,177	81	10,647	1,026,669	14.6	0.05	0.68	4.10	3.44	57.7	39.8
Max. Rolling 12 Months				2,089.7	-	-	91.3	-	-	15.3	-	0.71	-	-	62.2	42.8
Permit Limit				2,847.0	-	-	854.0	-	-	36.5	-	1.90	-	-	97.7	50.0
Exceeds Permit Limit?				NO	-	-	NO	-	-	NO	-	NO	-	-	NO	NO
Excess Emissions (Max. Rolling 12 Months)				-757.3	-	-	-762.7	-	-	-21.2	-	-1.19	-	-	-35.4	-7.2
Excess Emissions (Compliance Year)				-1,011.9	-	-	-772.9	-	-	-21.9	-	-1.22	-	-	-40.0	-10.2

*CEMS data columns calculate monthly emissions by summing the pounds per hour emissions for every hour during the month that the turbine was operating, including start-ups, shut-downs, and upsets. The CEMS uses the following methodology to estimate emissions as presented in this condition of the permit.

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

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

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

HHV = 1,033 btu/cf (average HHV of fuel analyses over compliance year)

NOx = 46 lb/lb-mole

CO = 28 lb/lb-mole

HORIZON

AIR MEASUREMENT SERVICES, INC.

Horizon Test No.: N20-002-FR
Date Tested: March 22 and 23, 2021
Report Date: April 19, 2021
Revision Number: 0

CERTIFICATION TESTING ON A CONTINUOUS EMISSIONS MONITORING SYSTEMS (CEMS) AND RELATIVE ACCURACY TEST AUDIT (RATA)

VCAPCD PART 70 Permit No. 00157
Attachment STRMLN157-MPx. CO, NH_3 - rev 241
GE LM-2500-PK

Prepared for:

New-Indy Oxnard, LLC
P.O. Box 519
Port Hueneme, California 93044

Facility:

New-Indy Oxnard, LLC
5936 Perkins Road
Oxnard, California 93033

Prepared by:

Horizon Air Measurement Services, Inc.
310 Cortez Circle
Camarillo, California 93012

Regulatory Agency:

Ventura County Air Pollution Control District
669 County Square Drive, 2nd Floor
Ventura, California 93003

Scott H. Bunch
Sr. Project Manager

Joseph M. Bennett
Technical Operations Manager

TABLE OF CONTENTS

1. INTRODUCTION

New-Indy Oxnard, LLC (New Indy) operates a cogeneration unit at their faclility located at 5936 Perkins Road in Oxnard, California. The unit consists of a GE LM-2500-PK gas turbine that drives a 29 MW electrical generator and a 51 million British thermal units per hour (MMBtu/hr) Coen duct burner. At the request of New-Indy a certification test program was conducted on the continuous emissions monitoring system (CEMS) associated with the cogeneration unit. The certification testing is required since the facility replaced the oxides of nitrogen (NO_X), carbon monoxide (CO) and oxygen (O_2) analyzer in addition to various components of the handling system. The parameters of interest, and the associated relative accuracy requirements are provided in Table 1-1.

The test program requirements were completed on the following dates:

7 Day (24-hour) Calibration Test (Drift)	Not Completed*
Analyzer Linearity	March 22, 2021
Sample System Bias	March 22, 2021
NO_2 Conversion Efficiency	March 22, 2021
Sample System Cycle Time	March 22, 2021
CO_2 Interference	March 22, 2021
NH_3 Interference	March 23, 2021
$NO_X/CO/O_2$/Flow Rate RATA	March 23, 2021

**Note: The facility was operating on an emergency variance and was not be able to complete the 7-day drift test prior to the scheduled test/certification as approved by VCAPCD.*

The Continuous Emissions Monitoring System (CEMS) must comply with the following performance specifications:

a. Continuous monitoring systems for measuring nitrogen oxides shall comply with 40 CFR, Part 60, Appendix B, Performance Specification 2.

b. Continuous monitoring systems for measuring oxygen shall comply with 40 CFR, Part 60, Appendix B, Performance Specification 3.

c. Continuous monitoring systems for measuring carbon monoxide with 40 CFR 60, Appendix B, Performance Specification 4A.

Nine, 30-minute test runs were completed at the "normal" load, whiled fired on natural gas, to fulfill the relative accuracy test audit (RATA) requirements outlined above.

The subject test program was completed on March 22 and 23, 2021 by Scott H. Bunch, Joseph M. Bennett and Rodolfo Ramirez of Horizon. Although notified, the VCAPCD did not have a representative present on site during the testing. Operation of the cogeneration unit and associated CEMS was the responsibility of New-Indy.

The results of the CEMS certification testing are provided in Section 2. A process and CEMS description is provided in Section 3. Section 4 describes the sampling/analytical Reference Methods utilized for the RATA. A Quality Assurance summary is provided in Section 5.

Table 1-1
Sources and Parameters of Interest
Relative Accuracy Test Audit (RATA)
New-Indy Oxnard, LLC
GE LM-2500-PK

Relative Accuracy Test Audit Requirements

Parameter	Units	No. of Test Runs	RA Limit
NO_X Concentration	ppm	9	20% or 10% of emission standard (40 CFR 60 Appendix B Specification 2)
CO Concentration	ppm	9	10% or 5 ppm difference absolute (40 CFR 60 Appendix B Specification 4A)
O_2 Concentration	%	9	10% or 1.0% O_2 absolute difference (40CFR 60, Appendix B Specification 3)

Certification Requirements

Parameter	Units	No. of Test Runs	RA Limit
Calibration Drift	ppm, %	7 days	± 2.5 % of span gas (NO_X/CO) / <0.5% (O_2)
Cycle Response Time	minutes	3	<15 minutes (NO_X and O_2) <4 minutes (CO)
Linearity	ppm/%	3	± 15 % of the cal gas (NO_X, CO & O_2) or If |R-A| <5 ppm NO_X/CO or 0.5% O_2
Sample System Bias Test	ppm/%	3	± 5 % of full scale (NO_X, CO and O_2)
NO_2 Converter Efficiency	ppm	1	> 90 % conversion (NO_X)

2. SUMMARY OF RESULTS

The results of the CEMS certification test program are summarized in the following Tables:

Table 2-1	RATA Results Summary
Table 2-2	Oxides of Nitrogen
Table 2-3	Carbon Monoxide
Table 2-4	Oxygen
Table 2-5	Analyzer Linearity Results
Table 2-6	Sample System Bias Results
Table 2-7	Cycle Response Time Results
Table 2-8	NO_2 Conversion Efficiency Results
Table 2-9	Interference Test Results

2.1 RATA Results

The results of the relative accuracy test audit (RATA) for NO_X concentration, CO concentration, O_2 concentration and NO_X emission rate are provided in Tables 2-2 through 2-4, respectively. Concentrations of NO_X and O_2 were within the relative accuracy requirement of 40 CFR Part 60, Appendix B, Performance Specifications 2 and 3, respectively. Since Reference Method CO concentration was within 5 ppm of the CEMS value, as specified in Performance Specifications 4A, Section 2.5, the unit passed the RATA.

Test Critique

During the initial ammonia interference test on March 22 the analyzer appeared to have a reaction to the ammonia gas. The ammonia interference test was performed again on March 23. No interference was noted. The results of this test can be found in Table 2-11. No sampling or analytical problems were encountered during any phase of the test program.

Table 2-1
Summary of Results
Relative Accuracy Test Audit
New-Indy Oxnard, LLC
GE LM-2500-PK

Parameter	Relative Accuracy (%)	Mean Difference (ppm/%)	40 CFR 60 Criteria
Oxides of Nitrogen @ 15% O_2	2.96	0.194	20%
Carbon Monoxide @ 15% O_2	7.07	1.475*	10% or 5ppm difference
Oxygen	0.77	0.083	1.0% O_2 difference (absolute)

* Mean difference plus the confidence coefficient per 40 CFR 60 PS 4A.

Table 2-2
Oxides of Nitrogen @ 15% O_2
Relative Accuracy and Bias Test Calculations
GE LM-2500-PK

Data Point Number	Reference Method (ppm)	Date	Time (start)	Appendix	CEMS Data (ppm)	Appendix	Difference (ppm)
1	10.77	03/23/21	923	A.1	10.53	A.2	0.24
2	10.67	03/23/21	953	A.1	10.32	A.2	0.35
3	10.87	03/23/21	1023	A.1	10.57	A.2	0.30
4	11.04	03/23/21	1110	A.1	10.68	A.2	0.36
5	11.08	03/23/21	1140	A.1	10.72	A.2	0.36
6	10.40	03/23/21	1242	A.1	10.34	A.2	0.06
7	10.48	03/23/21	1328	A.1	10.47	A.2	0.01
8	10.58	03/23/21	1358	A.1	10.48	A.2	0.10
9	10.45	03/23/21	1428	A.1	10.48	A.2	-0.03

RM Average	10.70 (ppm)	10.51 (ppm)
Average Difference	0.194 (ppm)	
Number	9	
Standard Deviation	0.161 (ppm)	
T Value	2.306	
Confidence Coefficient	0.123 (ppm)	
Relative Accuracy	2.96 %	
Bias Adjustment Factor	1.000	

Table 2-3
Carbon Monoxide @ 15% O_2
Relative Accuracy and Bias Test Calculations
GE LM-2500-PK

Data Point Number	Reference Method (ppm)	Date	Time (start)	Appendix	CEMS Data (ppm)	Appendix	Difference (ppm)
1	23.66	03/23/21	923	A.1	22.68	A.2	0.98
2	23.69	03/23/21	953	A.1	22.34	A.2	1.35
3	22.67	03/23/21	1023	A.1	21.48	A.2	1.19
4	21.35	03/23/21	1110	A.1	19.45	A.2	1.90
5	19.88	03/23/21	1140	A.1	18.20	A.2	1.68
6	19.93	03/23/21	1242	A.1	18.92	A.2	1.01
7	19.21	03/23/21	1328	A.1	18.35	A.2	0.86
8	18.42	03/23/21	1358	A.1	17.76	A.2	0.66
9	19.07	03/23/21	1428	A.1	18.42	A.2	0.65

RM Average	20.88 (ppm)	19.73 (ppm)
Average Difference	1.142 (ppm)	
Number	9	
Standard Deviation	0.434 (ppm)	
T Value	2.306	
Confidence Coefficient	0.333 (ppm)	
Relative Accuracy	7.07 %	
Bias Adjustment Factor	1.058	

Table 2-4
Oxygen
Relative Accuracy and Bias Test Calculations
GE LM-2500-PK

Data Point Number	Reference Method (%)	Date	Time (%)	Appendix	CEMS Data (%)	Appendix	Difference (%)
1	15.01	03/23/21	923	A.1	14.97	A.2	0.04
2	15.07	03/23/21	953	A.1	14.98	A.2	0.09
3	14.95	03/23/21	1023	A.1	14.88	A.2	0.07
4	14.86	03/23/21	1110	A.1	14.69	A.2	0.17
5	14.67	03/23/21	1140	A.1	14.55	A.2	0.12
6	14.78	03/23/21	1242	A.1	14.71	A.2	0.07
7	14.90	03/23/21	1328	A.1	14.83	A.2	0.07
8	14.88	03/23/21	1358	A.1	14.82	A.2	0.06
9	14.96	03/23/21	1428	A.1	14.92	A.2	0.04

RM Average	14.90 (%)	14.82 (%)
Average Difference	0.083 (%)	
Number	9	
Standard Deviation	0.041 (%)	
T Value	2.306	
Confidence Coefficient	0.031 (%)	
Relative Accuracy	0.77 %	
Bias Adjustment Factor	1.000	

2.2 7 Day (24 hour) Calibration Error (Drift)

The facility was operating on an emergency variance and was not be able to complete the 7-day drift test prior to the scheduled test/certification as approved by VCAPCD.

2.3 Linearity Test

The results of the linearity test are provided in Table 2-5. The linearity requirement of ±15% of the calibration gas value was met for all parameters. The reported results are based upon the average of three test runs.

Table 2-5
Analyzer Linearity Results
New-Indy Oxnard, LLC
GE LM-2500-PK

	NO_X	CO	O_2
	0-100 ppm	0-100 ppm	0-25%
Low	-0.70%	-2.15%	-1.81%
Mid	0.21%	-0.22%	-0.41%
High	-0.13%	-0.14%	-0.03%

2.4 Sample System Bias

The sample system bias for the NO_X CO and O_2 analyzer is provided in Table 2-6. All analyzers fulfilled the requirement of ±5% of full scale. The reported results are based upon the average of three test runs.

Table 2-6
Sample System Bias Results
New-Indy Oxnard, LLC
GE LM-2500-PK

	NO_X	CO	O_2
	0-100 ppm	0-100 ppm	0-25%
Zero Gas	1.47%	0.33%	0.84%
Span Gas	-1.15%	-2.16%	-0.57%

2.5 Cycle Response Time

The sample system cycle response time for the NO_X CO and O_2 analyzers are provided in Table 2-7. The procedure was performed on the NO_X, the CO and the O_2 analyzers and the longest response time (upscale or downscale) per analyzers was reported as the system cycle response time. The response time of less 15-minutes was achieved for the NO_X and O_2 analyzers and less than 4-minutes for the CO analyzer. The reported results are based upon the average of three test runs.

Table 2-7
Cycle Response Time Results
New-Indy Oxnard, LLC
GE LM-2500-PK

NO_X	CO	O_2
0-100 ppm	0-100 ppm	0-25%
142 seconds	145 seconds	148 seconds

2.6 NO_2 Converter Efficiency

The NO_X analyzer NO_2 converter efficiency is provided in Table 2-8. The NO_x analyzer NO_2 converter efficiency met the requirement of greater than or equal to 90%. The reported results are based upon the average of three test runs.

Table 2-8
NO_2 Converter Efficiency Results
New-Indy Oxnard, LLC
GE LM-2500-PK

Reference Gas Value	Analyzer Results	Converter Efficiency
51.29 ppm NO_2	46.71 ppm NO_X	91.08%

2.7 Interference Test Results

The NO_X analyzer was evaluated for interference from ammonia by injecting an ammonia gas (approximately 8 ppm) into the analyzer and recording the response. The CO analyzer was evaluated for interference from carbon dioxide by injecting an carbon dioxide gas (approximately 7%) into the analyzer and recording the response.

The results of the interference test are provided in Table 2-9. There is no pass/fail criteria for this procedure. The reported results are the average of three test runs.

Table 2-9
Interference Test Results
New-Indy Oxnard, LLC
GE LM-2500-PK

	Reference Gas Value	Analyzer Results	Interference
NO_X Analyzer	8.380 ppm NH_3	0.07 ppm NO_X	0.07% scale
CO Analyzer	7.035% CO_2	-1.20 ppm CO	-1.20% scale

3. PROCESS DESCRIPTION

3.1 Facility Description

The subject facility is a manufacturing facility that produces corrugating medium, a paper component used in the manufacture of corrugated containers, such as cardboard boxes. This source has a Standard Industrial Classification (SIC) Code of 2631, Paperboard Mills. Major equipment at the source includes ta natural gas-fired cogeneration turbine that provides the paper process with electricity, steam and hot air; and a natural gas-fired boiler that is used in place of the turbine during planned turbine maintenance or when breakdown occurs at the turbine. This stationary source is subject to the VCAPCD Part 70 permit program based upon the potential to emit nitrogen oxides (NO_X), and carbon monoxide (CO).

3.2 Cogeneration Unit Description

The subject Cogeneration Unit consists of a General Electric LM-2500 PK natural gas-fired turbine that drives a 29 MW electrical generator and is rated 290 MMBtu/hr. The associated duct burner is rated at 51 MMBtu/hr. Babcock-Hitachi selective catalytic reduction (SCR) system with ammonia injection for NO_X reduction. The facility operates a continuous emissions monitoring system (CEMS) at the turbine which continuously monitors control system operating parameters as well as emissions of O_2 concentration and NO_X and CO concentration at 15% O_2.

3.3 Unit Operating Conditions

During all RATA test runs the unit was operated at the "normal" load while fired on natural gas. The "maximum" is also considered to be the "normal" load. The following operating parameters were monitored, during testing, by the facility:

- fuel flow rate, klb/hr
- MW output

3.4 CEMS Description

The facility is replacing the existing CEMS monitors with new replacement analyzers. Following is a Table of the former analyzers and the new replacement analyzers:

Former Equipment

Gaseous Component Monitored	Manufacturer	Model No.	Method of Detection	Operating Range
NO_X	Rosemount	NGA 2000	Chemiluminescent	0-100 ppm
O_2	Rosemount	NGA 2000	Paramagnetic	0-25 %
CO	Rosemount	NGA 2000	NDIR	0-100 ppm

New Equipment

Gaseous Component Monitored	Manufacturer	Model No.	Method of Detection	Operating Range
NO_X	Horiba	VA-5126	Chemiluminescent	0-100 ppm
O_2	Horiba	VA-5126	Paramagnetic	0-25%
CO	Horiba	VA-5126	NDIR	0-100 ppm

4. CEMS RE-CERTIFICATION TEST PROCEDURES

4.1 Relative Accuracy Test Audit Procedures

All RATA testing was performed with the unit under normal operating conditions. A minimum of nine, replicate test runs were performed, simultaneously, using the following methods:

Parameter	Method
O_2/CO_2	EPA Method 3A
NO_X	EPA Method 7E
CO	EPA Method 10

A description of each of the applicable EPA Methods is provided in Appendix C. Each test run was a minimum of 30 minutes in duration. The relative accuracy test for pollutant concentration monitors and emission rate measurement systems was calculated using the equation outlined below:

$$RA = \frac{|\bar{d}| + |cc|}{\overline{RM}} \times 100$$

Where:

$\lvert\bar{d}\rvert$	=	absolute value of the mean of differences.
$\lvert cc \rvert$	=	absolute value of the confidence coefficient
RM	=	average RM value

4.1.1 Sampling Locations

The subject unit was sampled from the 54-inch by 125-inch exhaust stack (75 inches equivalent diameter). The sample ports are located zero diameters upstream from and one equivalent diameter downstream of a disturbance. Thus, the sampling location does not meet the requirements of EPA Method 1. The facility CEMS systems is equipped with an integrated sampling probe for sample collection. Horizon utilized an attachment at the valve box near the stack to pull stack gas from the facilities integrated probe.

4.1.2 Fixed Gases (CO_2, O_2, N_2)

Fixed gas concentration was determined in accordance with EPA Method 3A, as described in Appendix C.

4.1.3 Oxides of Nitrogen (NO_X)

Concentration of NO_X was determined in accordance with EPA Method 7E, as described in Appendix C.

4.1.4 Carbon Monoxide (CO)

Concentration of CO was determined in accordance with EPA Method 10, as described in Appendix C.

4.2 24-Hour (7-Day) Zero and Calibration Error

Within two weeks of the relative accuracy (RATA) tests, the seven day drift test was completed by the facility. Calibration drift test data was provided to Horizon by the facility. For the 7-day drift test, the NO_X CO, and O_2 drift were checked using the calibration error check, approximately 24 hours apart on seven consecutive days as described in 40 CFR Part 75.

To conduct the calibration error test the calibration gases (NIST certified reference or Protocol 1) were introduced at the gas injection port and through the sample system. The monitors response were recorded from the data acquisition system. The calibration error requirement for the O_2 analyzer is 0.5 %. The calibration error requirement for the NO_X and CO analyzers are ±2.5 % of full scale (± 5 ppm absolute value for Part 75). Calibration error for the NO_X CO, and O_2 analyzers were determined using the following equation each day:

$$CE = \frac{[R - A]}{S} \times 100$$

Where:

CE = The percentage calibration error based on the span range.
R = The reference value of zero or high-level calibration gas introduced into the monitoring system.
A = The actual monitoring system response to the calibration gas.
S = The span range of the instrument.

4.3 Cycle Response Time

The cycle response time test was performed by allowing the CEMS to sample flue gas normally and then introducing zero gas (low level gas) to the sample probe, as near to the sample inlet as possible, and allowing the CEMS readings to stabilize at the zero (low level) reading. Downscale response time is the time required for 95% of the step change to the final, stable value to be achieved. The procedure was repeated, introducing flue gas normally and then switching to a high level calibration gas, and allowing the reading to stabilize. The upscale response time was the time required for 95% of the step change to the final, stable value to be achieved. The procedure was performed on the NO_X, the CO and the O_2 analyzers and the longest response time (upscale or downscale) per analyzers was reported as the system cycle response time.

4.4 Sample System Bias

The sample system bias was determined by injecting zero and upscale calibration gas at two locations in the CEMS: directly to the analyzers and through the daily calibration line which subjects the gas to the entire sampling system. Sample System Bias is the difference between the CEMS responses to these two injections. System bias was reported for both zero and upscale gases on the NO_X, CO and O_2 analyzers.

The sampling system bias testing was conducted while the unit is operating under normal conditions.

4.5 NO_2 to NO Converter Efficiency

The NO_2 converter efficiency was determined by injecting the test gas into the NO_X analyzer portion of the CEMS. The injection was made at the inlet to the NO_X analyzer at the normal flow rate. The gas was injected until a stable value is observed. The indication was compared to the certified concentration of the gas. The converter efficiency percentage is the ratio of the indicated value divided by the certified value times 100. For this program, an NO_2 gas of 51.29 ppm NO_2 (51% of range)was used to determine the NO_2 converter efficiency.

4.6 Linearity Test

The linearity test was performed according to the procedures described 40 CFR Part 75 (Appendix A, Section 6.2) for NO_X and in 40 CFR Part 60 (Appendix F, Procedure 1.Section 5.1.2) for CO and O_2. The CEMS was operated in its normal sampling mode during the test. The audit gases was introduced to the system through the line normally used for daily calibration. With this configuration, the audit gases are subjected to all components downstream of, and including, the valve box.

Analyzer responses to the audit were documented by the DAS as 1-minute data files.

For the linearty on the new high CO range, a cylinder gas audit (CGA) was conducted. The CGA consists of challenging the CEMS with an audit gas of known concentration at two points for CO (20-30% range and 50-60% range). The audit gas concentrations were selected based on the criteria stipulated in 40 CFR, Part 60, Appendix F, Section 5.

The linearity on the NO_X analyzer consists of challenging the analyzer with an audit gas of known concentration at three points (20-30% range, 50-60% range and 80-100% range). The NO_X audit gas concentrations were selected based on the criteria stipulated in 40 CFR, Part 75 Section 5. Each gas was introduced to the CEMS three times on an alternating basis (i.e., low gas, mid gas, high gas, etc. for each range of each analyzer). Each audit gas was injected until a steady analyzer response is obtained.

4.7 Interference Test

The interference test was conducted on the NO_X and CO analyzers. The NO_X analyzer was evaluated for interference from ammonia by injecting an ammonia gas (8 ppm) into the analyzer and recording the response.

The CO analyzer was evaluated for interference by injecting a carbon dioxide gas (7%) into the analyzer and recording the response.

5. QUALITY ASSURANCE PROCEDURES

A strict quality assurance program was adhered to throughout the field testing and analytical phases of the test program. Below is a summary of the QA/QC results.

5.1 EPA Methods 3A/6C/7E/10

The EPA Methods 3A/6C/7E/10 Continuous Emissions Monitoring System (CEMS) QC requirements are as follows:

- to the extent practical, measured concentrations were within the applicable measurement range of the analyzer scale used (20% - 100% of calibration span)
- sampling conditioning requirements were maintained including heated line temperature and knock-out temperature
- ammonia scrubber used, where appropriate
- successful system leak check, when required
- calibration gases recorded and within certification time requirements
- a linearity check (±2%) completed at the start and end of CEMS use (per day at minimum)
- successful stratification check completed and/or stack traversed with proper number of sample ports
- successful system bias check (±5%) completed prior to sampling
- response times recorded
- NO_2 conversion efficiency (> 90%) completed
- zero and calibrations drift checks (± 3%) completed at proper intervals
- strip charts properly annotated with calibration gas values/id, calibrations, response times, sample points, start/end times, etc.
- data acquisition system (DAS) values averaged and recorded with proper annotation for calibrations, start/end times, sample ports and at a minimum of one minute intervals

All Method QC requirements were successfully fulfilled.

APPENDIX A - $NO_X/CO/O_2$ RATA

APPENDIX A.1 - Reference Method Results

Emission Rate Determination

Facility: **New-Indy Oxnard, LLC**
Source: **GE LM-2500-PK**
Job No.: **N20-002**
Date: **03/23/21**

STANDARD TEMPERATURE	Degrees F	68	68	68	68	68	68	68	68	68
RUN NUMBER	******	1	2	3	4	5	6	7	8	9
CLOCK TIME: INITIAL	******	923	953	1023	1110	1140	1242	1328	1358	1428
CLOCK TIME: FINAL	******	952	1022	1052	1139	1209	1311	1357	1427	1457
BAROMETRIC PRESSURE	Inches HG	30.01	30.01	30.01	30.01	30.01	30.01	30.01	30.01	30.01
SAMPLING TIME	Minutes	30	30	30	30	30	30	30	30	30
CO2	Percent	3.37	3.32	3.38	3.44	3.53	3.46	3.40	3.40	3.35
O2	**Percent**	**15.01**	**15.07**	**14.95**	**14.86**	**14.67**	**14.78**	**14.90**	**14.88**	**14.96**
N2	Percent	81.63	81.61	81.67	81.70	81.79	81.76	81.70	81.71	81.69
OXIDES OF NITROGEN										
CONCENTRATION	**ppm**	**10.75**	**10.54**	**10.95**	**11.31**	**11.69**	**10.78**	**10.66**	**10.78**	**10.52**
CONCENTRATION @ 15% O2	**ppm**	**10.77**	**10.67**	**10.87**	**11.04**	**11.08**	**10.40**	**10.48**	**10.58**	**10.45**
POLLUTANT CONCENTRATION	lb/dscf	1.28E-06	1.26E-06	1.31E-06	1.35E-06	1.40E-06	1.29E-06	1.27E-06	1.29E-06	1.26E-06
EPA F-FACTOR	scf/MMBtu	8710	8710	8710	8710	8710	8710	8710	8710	8710
EMISSION RATE	**lb/MMBtu**	**0.040**	**0.039**	**0.040**	**0.041**	**0.041**	**0.038**	**0.039**	**0.039**	**0.039**
CARBON MONOXIDE										
CONCENTRATION	**ppm**	**23.63**	**23.39**	**22.85**	**21.87**	**20.97**	**20.65**	**19.54**	**18.79**	**19.19**
CONCENTRATION @ 15% O2	**ppm**	**23.66**	**23.69**	**22.67**	**21.35**	**19.88**	**19.93**	**19.21**	**18.42**	**19.07**
POLLUTANT CONCENTRATION	lb/dscf	1.72E-06	1.70E-06	1.66E-06	1.59E-06	1.53E-06	1.50E-06	1.42E-06	1.37E-06	1.40E-06
EPA F-FACTOR	scf/MMBtu	8710	8710	8710	8710	8710	8710	8710	8710	8710
EMISSION RATE	**lb/MMBtu**	**0.053**	**0.053**	**0.051**	**0.048**	**0.045**	**0.045**	**0.043**	**0.041**	**0.043**

Facility:	**New-Indy Oxnard, LLC**	**Run No.:**	**1**
Source:	**GE LM-2500-PK**	**Fuel:**	**Natural Gas**
Job No.:	**N20-002**	**Std. O2:**	**15**
Date:	**03/23/21**		

**** CALIBRATION GAS ****

	O2	CO2	NOx	CO
	%	%	ppm	ppm
Range:	25	20	25	100
Calibration Gas Values	%	%	ppm	ppm
Zero	0.00	0.00	0.00	0.00
Mid	12.06	10.16	12.65	45.28
High	22.46	16.93	24.33	89.63
NO_2			51.29	

**** ANALYZER CALIBRATION ****

** PRE-TEST **

Analyzer Response		%	%	ppm	ppm
Zero		0.05	0.03	0.13	0.10
Mid		12.04	10.17	12.67	45.68
High		22.42	16.88	24.24	88.32
NO_2				49.22	
Calibration Error	(must be within 2.0%)	%	%	%	%
Zero		0.22	0.17	0.54	0.11
Mid		-0.11	0.03	0.08	0.45
High		-0.16	-0.32	-0.38	-1.46
NO_2 (Conversion)	(must be >90 %)			95.96	

** POST- TEST **

Analyzer Response		%	%	ppm	ppm
Zero		0.00	0.06	0.08	0.40
Mid		11.96	10.20	12.69	45.84
High		22.34	16.76	24.28	89.10
Calibration Error	(must be within 2.0%)	%	%	%	%
Zero		-0.01	0.34	0.34	0.45
Mid		-0.44	0.24	0.18	0.63
High		-0.55	-0.99	-0.22	-0.59

**** SYSTEM BIAS ****

** PRE-TEST **

Values		%	%	ppm	ppm
Zero		0.11	0.06	0.13	0.47
Span		12.01	10.17	12.20	45.47
System Bias	(must be within 5.0%)	%	%	%	%
Zero		0.29	0.16	0.00	0.41
Span		-0.12	0.01	-1.92	-0.23

** POST- TEST **

Values		%	%	ppm	ppm
Zero		0.13	0.07	0.18	0.32
Span		12.01	10.16	12.26	45.55
System Bias	(must be within 5.0%)	%	%	%	%
Zero		0.37	0.24	0.21	0.25
Span		-0.13	-0.01	-1.69	-0.15

** DRIFT **

** PRE-TEST **					
Values		%	%	ppm	ppm
Zero		0.11	0.06	0.13	0.47
Span		12.01	10.17	12.20	45.47
** POST-TEST **					
Values		%	%	ppm	ppm
Zero		0.13	0.07	0.18	0.32
Span		12.01	10.16	12.26	45.55
Drift	(must be within 3.0%)	%	%	%	%
Zero		0.08	0.09	0.20	-0.16
Span		-0.01	-0.02	0.23	0.09

** EFFLUENT GAS CONCENTRATION **

Bias-Corrected Concentration	**15.01**	**3.37**	**10.75**	**23.63**
Bias-Corrected Conc.(O2 adjusted)			**10.77**	**23.66**

** RAW AVERAGE CONCENTRATION **

Average:		14.91	3.41	10.42	23.94
O2 adjust:	15			10.27	23.59
Date	Time	O2	CO2	NOx	CO
23-Mar-21	923	14.89	3.43	10.34	24.58
23-Mar-21	924	14.89	3.43	10.47	24.45
23-Mar-21	925	14.89	3.43	10.52	24.35
23-Mar-21	926	14.90	3.42	10.66	24.23
23-Mar-21	927	14.90	3.42	10.49	24.33
23-Mar-21	928	14.90	3.42	10.27	24.31
23-Mar-21	929	14.90	3.42	10.36	24.17
23-Mar-21	930	14.90	3.42	10.29	24.16
23-Mar-21	931	14.91	3.42	10.35	24.26
23-Mar-21	932	14.91	3.41	10.30	24.27
23-Mar-21	933	14.92	3.41	10.31	24.20
23-Mar-21	934	14.90	3.42	10.82	23.93
23-Mar-21	935	14.91	3.41	10.82	23.90
23-Mar-21	936	14.90	3.42	10.79	23.89
23-Mar-21	937	14.91	3.41	10.58	23.87
23-Mar-21	938	14.91	3.41	10.10	23.99
23-Mar-21	939	14.91	3.42	10.26	23.81
23-Mar-21	940	14.91	3.41	10.15	23.96
23-Mar-21	941	14.91	3.41	10.29	23.68
23-Mar-21	942	14.91	3.41	10.54	23.59
23-Mar-21	943	14.91	3.41	10.52	23.62
23-Mar-21	944	14.92	3.41	10.47	23.63
23-Mar-21	945	14.93	3.40	10.49	23.52
23-Mar-21	946	14.93	3.40	10.38	23.64
23-Mar-21	947	14.94	3.39	10.30	23.58
23-Mar-21	948	14.93	3.38	10.12	23.69
23-Mar-21	949	14.93	3.39	10.37	23.45
23-Mar-21	950	14.93	3.39	10.39	23.69
23-Mar-21	951	14.94	3.38	10.38	23.71
23-Mar-21	952	14.95	3.38	10.39	23.69

Facility:	**New-Indy Oxnard, LLC**	**Run No.:**	**2**
Source:	**GE LM-2500-PK**	**Fuel:**	**Natural Ga**
Job No.:	**N20-002**	**Std. O2:**	**15**
Date:	**03/23/21**		

**** CALIBRATION GAS ****

	O2	CO2	NOx	CO	
	%	%	ppm	ppm	
Range:	25	20	25	100	
Calibration Gas Values	%	%	ppm	ppm	
Zero	0.00	0.00	0.00	0.00	
Mid	12.06	10.16	12.65	45.28	
High	22.46	16.93	24.33	89.63	
NO_2			51.29		

**** ANALYZER CALIBRATION ****

** PRE-TEST **						
Analyzer Response		%	%	ppm	ppm	
Zero		0.05	0.03	0.13	0.10	
Mid		12.04	10.17	12.67	45.68	
High		22.42	16.88	24.24	88.32	
NO_2				49.22		
Calibration Error	(must be within 2.0%)	%	%	%	%	
Zero		0.22	0.17	0.54	0.11	
Mid		-0.11	0.03	0.08	0.45	
High		-0.16	-0.32	-0.38	-1.46	
NO_2 (Conversion)	(must be >90 %)			95.96		
** POST- TEST **						
Analyzer Response		%	%	ppm	ppm	
Zero		0.00	0.06	0.08	0.40	
Mid		11.96	10.20	12.69	45.84	
High		22.34	16.76	24.28	89.10	
Calibration Error	(must be within 2.0%)	%	%	%	%	
Zero		-0.01	0.34	0.34	0.45	
Mid		-0.44	0.24	0.18	0.63	
High		-0.55	-0.99	-0.22	-0.59	

**** SYSTEM BIAS ****

** PRE-TEST **						
Values		%	%	ppm	ppm	
Zero		0.11	0.06	0.13	0.47	
Span		12.01	10.17	12.20	45.47	
System Bias	(must be within 5.0%)	%	%	%	%	
Zero		0.29	0.16	0.00	0.41	
Span		-0.12	0.01	-1.92	-0.23	
** POST- TEST **						
Values		%	%	ppm	ppm	
Zero		0.13	0.07	0.18	0.32	
Span		12.01	10.16	12.26	45.55	
System Bias	(must be within 5.0%)	%	%	%	%	
Zero		0.37	0.24	0.21	0.25	
Span		-0.13	-0.01	-1.69	-0.15	

** DRIFT **

** PRE-TEST **				
Values	%	%	ppm	ppm
Zero	0.11	0.06	0.13	0.47
Span	12.01	10.17	12.20	45.47
**** POST-TEST ****				
Values	%	%	ppm	ppm
Zero	0.13	0.07	0.18	0.32
Span	12.01	10.16	12.26	45.55
Drift (must be within 3.0%)	%	%	%	%
Zero	0.08	0.09	0.20	-0.16
Span	-0.01	-0.02	0.23	0.09

** EFFLUENT GAS CONCENTRATION **

Bias-Corrected Concentration	**15.07**	**3.32**	**10.54**	**23.39**
Bias-Corrected Conc.(O2 adjusted)			**10.67**	**23.69**

** RAW AVERAGE CONCENTRATION **

Average:		14.98	3.36	10.22	23.70
O2 adjust:	15			10.18	23.61
Date	Time	O2	CO2	NOx	CO
23-Mar-21	953	14.95	3.38	10.21	23.66
23-Mar-21	954	14.95	3.38	10.24	23.49
23-Mar-21	955	14.94	3.38	10.36	23.28
23-Mar-21	956	14.94	3.38	10.33	23.12
23-Mar-21	957	14.95	3.38	10.35	23.08
23-Mar-21	958	14.94	3.38	10.43	23.12
23-Mar-21	959	14.94	3.38	10.44	23.24
23-Mar-21	1000	14.95	3.37	10.28	23.32
23-Mar-21	1001	14.95	3.38	10.07	23.51
23-Mar-21	1002	14.94	3.38	10.02	23.47
23-Mar-21	1003	14.96	3.37	9.88	23.56
23-Mar-21	1004	14.96	3.37	9.85	23.74
23-Mar-21	1005	14.97	3.37	9.91	23.89
23-Mar-21	1006	14.97	3.38	10.03	23.93
23-Mar-21	1007	14.96	3.38	10.45	23.79
23-Mar-21	1008	14.96	3.37	10.41	23.94
23-Mar-21	1009	14.96	3.37	10.62	23.83
23-Mar-21	1010	14.97	3.37	10.53	23.98
23-Mar-21	1011	14.97	3.37	10.61	24.20
23-Mar-21	1012	14.96	3.37	10.66	24.07
23-Mar-21	1013	14.95	3.37	10.60	24.14
23-Mar-21	1014	14.92	3.40	10.43	24.23
23-Mar-21	1015	14.93	3.39	10.06	24.44
23-Mar-21	1016	14.99	3.36	9.89	24.80
23-Mar-21	1017	15.05	3.32	9.86	24.59
23-Mar-21	1018	15.08	3.31	9.74	23.87
23-Mar-21	1019	15.08	3.30	9.93	23.39
23-Mar-21	1020	15.08	3.30	9.94	23.28
23-Mar-21	1021	15.07	3.31	10.10	23.06
23-Mar-21	1022	15.07	3.31	10.24	22.93

Facility:	**New-Indy Oxnard, LLC**	**Run No.:**	**3**
Source:	**GE LM-2500-PK**	**Fuel:**	**Natural Gas**
Job No.:	**N20-002**	**Std. O2:**	**15**
Date:	**03/23/21**		

**** CALIBRATION GAS ****

	O2	CO2	NOx	CO
	%	%	ppm	ppm
Range:	25	20	25	100
Calibration Gas Values	%	%	ppm	ppm
Zero	0.00	0.00	0.00	0.00
Mid	12.06	10.16	12.65	45.28
High	22.46	16.93	24.33	89.63
NO_2			51.29	

**** ANALYZER CALIBRATION ****

** PRE-TEST **

Analyzer Response	%	%	ppm	ppm
Zero	0.05	0.03	0.13	0.10
Mid	12.04	10.17	12.67	45.68
High	22.42	16.88	24.24	88.32
NO_2			49.22	
Calibration Error (must be within 2.0%)	%	%	%	%
Zero	0.22	0.17	0.54	0.11
Mid	-0.11	0.03	0.08	0.45
High	-0.16	-0.32	-0.38	-1.46
NO_2 (Conversion) (must be >90 %)			95.96	

** POST- TEST **

Analyzer Response	%	%	ppm	ppm
Zero	0.00	0.06	0.08	0.40
Mid	11.96	10.20	12.69	45.84
High	22.34	16.76	24.28	89.10
Calibration Error (must be within 2.0%)	%	%	%	%
Zero	-0.01	0.34	0.34	0.45
Mid	-0.44	0.24	0.18	0.63
High	-0.55	-0.99	-0.22	-0.59

**** SYSTEM BIAS ****

** PRE-TEST **

Values	%	%	ppm	ppm
Zero	0.11	0.06	0.13	0.47
Span	12.01	10.17	12.20	45.47
System Bias (must be within 5.0%)	%	%	%	%
Zero	0.29	0.16	0.00	0.41
Span	-0.12	0.01	-1.92	-0.23

** POST- TEST **

Values	%	%	ppm	ppm
Zero	0.13	0.07	0.18	0.32
Span	12.01	10.16	12.26	45.55
System Bias (must be within 5.0%)	%	%	%	%
Zero	0.37	0.24	0.21	0.25
Span	-0.13	-0.01	-1.69	-0.15

**** DRIFT ****

** PRE-TEST **					
Values		%	%	ppm	ppm
Zero		0.11	0.06	0.13	0.47
Span		12.01	10.17	12.20	45.47
** POST-TEST **					
Values		%	%	ppm	ppm
Zero		0.13	0.07	0.18	0.32
Span		12.01	10.16	12.26	45.55
Drift	(must be within 3.0%)	%	%	%	%
Zero		0.08	0.09	0.20	-0.16
Span		-0.01	-0.02	0.23	0.09

**** EFFLUENT GAS CONCENTRATION ****

Bias-Corrected Concentration	**14.95**	**3.38**	**10.95**	**22.85**
Bias-Corrected Conc.(O2 adjusted)			**10.87**	**22.67**

**** RAW AVERAGE CONCENTRATION ****

Average:		14.86	3.42	10.61	23.16
O2 adjust:	15			10.36	22.62
Date	Time	O2	CO2	NOx	CO
23-Mar-21	1023	15.07	3.31	10.28	22.88
23-Mar-21	1024	15.07	3.31	10.48	22.79
23-Mar-21	1025	15.07	3.31	10.57	22.69
23-Mar-21	1026	15.06	3.31	10.68	22.55
23-Mar-21	1027	15.05	3.32	10.93	22.35
23-Mar-21	1028	15.05	3.31	11.00	22.34
23-Mar-21	1029	15.04	3.32	11.11	22.18
23-Mar-21	1030	15.02	3.33	10.79	22.36
23-Mar-21	1031	14.90	3.40	10.30	23.04
23-Mar-21	1032	14.87	3.42	9.96	23.53
23-Mar-21	1033	14.86	3.42	10.14	23.67
23-Mar-21	1034	14.84	3.42	10.46	23.66
23-Mar-21	1035	14.85	3.42	10.43	23.73
23-Mar-21	1036	14.76	3.47	10.24	23.57
23-Mar-21	1037	14.62	3.56	10.34	22.82
23-Mar-21	1038	14.56	3.59	10.60	22.09
23-Mar-21	1039	14.56	3.60	11.04	22.11
23-Mar-21	1040	14.56	3.60	11.59	22.08
23-Mar-21	1041	14.56	3.60	11.68	22.09
23-Mar-21	1042	14.56	3.60	11.71	22.26
23-Mar-21	1043	14.67	3.53	11.73	22.87
23-Mar-21	1044	14.79	3.46	11.41	23.69
23-Mar-21	1045	14.88	3.41	11.08	24.30
23-Mar-21	1046	14.93	3.39	10.60	24.53
23-Mar-21	1047	14.93	3.39	10.26	24.34
23-Mar-21	1048	14.92	3.39	9.80	24.21
23-Mar-21	1049	14.92	3.39	9.77	24.24
23-Mar-21	1050	14.92	3.39	9.81	23.97
23-Mar-21	1051	14.93	3.38	9.72	24.00
23-Mar-21	1052	14.93	3.38	9.83	23.90

Facility:	**New-Indy Oxnard, LLC**	**Run No.:**	**4**
Source:	**GE LM-2500-PK**	**Fuel:**	**Natural Gas**
Job No.:	**N20-002**	**Std. O2:**	**15**
Date:	**03/23/21**		

**** CALIBRATION GAS ****

	O2	CO2	NOx	CO
	%	%	ppm	ppm
Range:	25	20	25	100
Calibration Gas Values	%	%	ppm	ppm
Zero	0.00	0.00	0.00	0.00
Mid	12.06	10.16	12.65	45.28
High	22.46	16.93	24.33	89.63
NO_2			51.29	

**** ANALYZER CALIBRATION ****

** PRE-TEST **

Analyzer Response		%	%	ppm	ppm
Zero		0.05	0.03	0.13	0.10
Mid		12.04	10.17	12.67	45.68
High		22.42	16.88	24.24	88.32
NO_2				49.22	
Calibration Error	(must be within 2.0%)	%	%	%	%
Zero		0.22	0.17	0.54	0.11
Mid		-0.11	0.03	0.08	0.45
High		-0.16	-0.32	-0.38	-1.46
NO_2 (Conversion)	(must be >90 %)			95.96	

** POST- TEST **

Analyzer Response		%	%	ppm	ppm
Zero		0.00	0.06	0.08	0.40
Mid		11.96	10.20	12.69	45.84
High		22.34	16.76	24.28	89.10
Calibration Error	(must be within 2.0%)	%	%	%	%
Zero		-0.01	0.34	0.34	0.45
Mid		-0.44	0.24	0.18	0.63
High		-0.55	-0.99	-0.22	-0.59

**** SYSTEM BIAS ****

** PRE-TEST **

Values		%	%	ppm	ppm
Zero		0.13	0.07	0.18	0.32
Span		12.01	10.16	12.26	45.55
System Bias	(must be within 5.0%)	%	%	%	%
Zero		0.37	0.24	0.21	0.25
Span		-0.13	-0.01	-1.69	-0.15

** POST- TEST **

Values		%	%	ppm	ppm
Zero		0.06	0.08	0.18	0.20
Span		11.95	10.19	12.42	45.12
System Bias	(must be within 5.0%)	%	%	%	%
Zero		0.07	0.28	0.19	0.11
Span		-0.37	0.13	-1.04	-0.63

** DRIFT **

** PRE-TEST **					
Values		%	%	ppm	ppm
Zero		0.13	0.07	0.18	0.32
Span		12.01	10.16	12.26	45.55
** POST-TEST **					
Values		%	%	ppm	ppm
Zero		0.06	0.08	0.18	0.20
Span		11.95	10.19	12.42	45.12
Drift	(must be within 3.0%)	%	%	%	%
Zero		-0.30	0.04	-0.02	-0.14
Span		-0.23	0.14	0.65	-0.48

** EFFLUENT GAS CONCENTRATION **

Bias-Corrected Concentration	**14.86**	**3.44**	**11.31**	**21.87**
Bias-Corrected Conc.(O2 adjusted)			**11.04**	**21.35**

** RAW AVERAGE CONCENTRATION **

Average:		14.73	3.50	11.05	22.03
O2 adjust:	15			10.58	21.08
Date	Time	O2	CO2	NOx	CO
23-Mar-21	1110	14.99	3.34	10.61	23.03
23-Mar-21	1111	15.01	3.34	10.94	23.16
23-Mar-21	1112	15.02	3.33	11.21	22.59
23-Mar-21	1113	15.03	3.32	11.21	22.22
23-Mar-21	1114	15.02	3.33	11.01	22.16
23-Mar-21	1115	15.02	3.33	10.85	21.89
23-Mar-21	1116	15.02	3.33	10.70	21.90
23-Mar-21	1117	15.02	3.34	10.55	21.81
23-Mar-21	1118	14.87	3.42	10.22	22.21
23-Mar-21	1119	14.83	3.44	10.23	22.93
23-Mar-21	1120	14.84	3.44	10.59	23.02
23-Mar-21	1121	14.84	3.44	10.71	23.12
23-Mar-21	1122	14.84	3.44	10.62	23.40
23-Mar-21	1123	14.75	3.49	10.78	23.02
23-Mar-21	1124	14.60	3.58	10.90	22.18
23-Mar-21	1125	14.54	3.60	11.12	21.35
23-Mar-21	1126	14.54	3.61	11.45	21.41
23-Mar-21	1127	14.52	3.62	12.06	21.28
23-Mar-21	1128	14.52	3.61	12.40	21.30
23-Mar-21	1129	14.52	3.62	12.38	21.19
23-Mar-21	1130	14.52	3.62	12.05	21.27
23-Mar-21	1131	14.52	3.62	11.70	21.24
23-Mar-21	1132	14.54	3.61	11.13	21.35
23-Mar-21	1133	14.58	3.59	10.81	21.77
23-Mar-21	1134	14.58	3.58	10.70	21.77
23-Mar-21	1135	14.58	3.58	10.71	21.77
23-Mar-21	1136	14.59	3.58	10.73	21.74
23-Mar-21	1137	14.58	3.58	10.92	21.65
23-Mar-21	1138	14.59	3.58	11.01	21.65
23-Mar-21	1139	14.58	3.57	11.29	21.58

Facility:	**New-Indy Oxnard, LLC**	**Run No.:**	**5**
Source:	**GE LM-2500-PK**	**Fuel:**	**Natural Gas**
Job No.:	**N20-002**	**Std. O2:**	**15**
Date:	**03/23/21**		

**** CALIBRATION GAS ****

	O2	CO2	NOx	CO
	%	%	ppm	ppm
Range:	25	20	25	100
Calibration Gas Values	%	%	ppm	ppm
Zero	0.00	0.00	0.00	0.00
Mid	12.06	10.16	12.65	45.28
High	22.46	16.93	24.33	89.63
NO_2			51.29	

**** ANALYZER CALIBRATION ****

** PRE-TEST **

Analyzer Response		%	%	ppm	ppm
Zero		0.05	0.03	0.13	0.10
Mid		12.04	10.17	12.67	45.68
High		22.42	16.88	24.24	88.32
NO_2				49.22	
Calibration Error	(must be within 2.0%)	%	%	%	%
Zero		0.22	0.17	0.54	0.11
Mid		-0.11	0.03	0.08	0.45
High		-0.16	-0.32	-0.38	-1.46
NO_2 (Conversion)	(must be >90 %)			95.96	

** POST- TEST **

Analyzer Response		%	%	ppm	ppm
Zero		0.00	0.06	0.08	0.40
Mid		11.96	10.20	12.69	45.84
High		22.34	16.76	24.28	89.10
Calibration Error	(must be within 2.0%)	%	%	%	%
Zero		-0.01	0.34	0.34	0.45
Mid		-0.44	0.24	0.18	0.63
High		-0.55	-0.99	-0.22	-0.59

**** SYSTEM BIAS ****

** PRE-TEST **

Values		%	%	ppm	ppm
Zero		0.13	0.07	0.18	0.32
Span		12.01	10.16	12.26	45.55
System Bias	(must be within 5.0%)	%	%	%	%
Zero		0.37	0.24	0.21	0.25
Span		-0.13	-0.01	-1.69	-0.15

** POST- TEST **

Values		%	%	ppm	ppm
Zero		0.06	0.08	0.18	0.20
Span		11.95	10.19	12.42	45.12
System Bias	(must be within 5.0%)	%	%	%	%
Zero		0.07	0.28	0.19	0.11
Span		-0.37	0.13	-1.04	-0.63

**** DRIFT ****

		** PRE-TEST **			
Values		%	%	ppm	ppm
Zero		0.13	0.07	0.18	0.32
Span		12.01	10.16	12.26	45.55
		** POST-TEST **			
Values		%	%	ppm	ppm
Zero		0.06	0.08	0.18	0.20
Span		11.95	10.19	12.42	45.12
Drift	(must be within 3.0%)	%	%	%	%
Zero		-0.30	0.04	-0.02	-0.14
Span		-0.23	0.14	0.65	-0.48

**** EFFLUENT GAS CONCENTRATION ****

Bias-Corrected Concentration	**14.67**	**3.53**	**11.69**	**20.97**
Bias-Corrected Conc.(O2 adjusted)			**11.08**	**19.88**

**** RAW AVERAGE CONCENTRATION ****

Average:		14.56	3.58	11.42	21.14
O2 adjust:	15			10.62	19.66
Date	Time	O2	CO2	NOx	CO
23-Mar-21	1140	14.58	3.58	11.36	21.55
23-Mar-21	1141	14.59	3.57	11.44	21.67
23-Mar-21	1142	14.59	3.57	11.43	21.69
23-Mar-21	1143	14.60	3.56	11.28	21.75
23-Mar-21	1144	14.61	3.56	11.25	21.82
23-Mar-21	1145	14.60	3.56	11.30	21.76
23-Mar-21	1146	14.58	3.57	11.26	21.70
23-Mar-21	1147	14.59	3.57	11.63	21.52
23-Mar-21	1148	14.56	3.59	11.48	21.53
23-Mar-21	1149	14.55	3.59	11.90	21.33
23-Mar-21	1150	14.57	3.57	11.47	21.44
23-Mar-21	1151	14.57	3.58	11.21	21.47
23-Mar-21	1152	14.56	3.58	11.44	21.35
23-Mar-21	1153	14.56	3.58	11.33	21.28
23-Mar-21	1154	14.54	3.59	11.63	21.10
23-Mar-21	1155	14.52	3.60	11.89	20.84
23-Mar-21	1156	14.53	3.60	11.48	20.84
23-Mar-21	1157	14.53	3.60	11.19	20.85
23-Mar-21	1158	14.53	3.60	11.45	20.77
23-Mar-21	1159	14.53	3.59	11.36	20.79
23-Mar-21	1200	14.54	3.59	11.22	20.92
23-Mar-21	1201	14.55	3.59	11.51	20.88
23-Mar-21	1202	14.55	3.58	11.39	20.91
23-Mar-21	1203	14.55	3.59	11.37	20.77
23-Mar-21	1204	14.54	3.59	11.29	20.81
23-Mar-21	1205	14.53	3.60	11.44	20.66
23-Mar-21	1206	14.53	3.60	11.38	20.62
23-Mar-21	1207	14.52	3.60	11.50	20.49
23-Mar-21	1208	14.52	3.60	11.39	20.45
23-Mar-21	1209	14.54	3.59	11.20	20.55