



Ventura County  
Air Pollution  
Control District

**RESPONSIBLE OFFICIAL'S  
CERTIFICATION FORM**

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


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

Ed Swede  
Air Quality Engineer  
Ventura County Air Pollution Control District  
4567 Telephone Road, Second Floor  
Ventura, CA 93003

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VENTURA COUNTY  
A.P.C.D.  
2022 FEB 14 PM 3:23

**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 of Responsible Official:  <small>Please use the Adobe Fill &amp; Sign option to sign (click the 'Sign Here' flag to link to additional instructions)</small>	Date: 2/11/2022
Title of Responsible Official: <i>Plant Manager</i>	
Facility ID: 00015	

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**2021 Reporting Year**

**Annual Title V Compliance Certification**

**For**

**Procter & Gamble Paper Products Company  
Oxnard, California Facility**

**VCAPCD Permit No. 00015**

Contact: Cindy Stines  
Site Environmental Leader  
805-485-8871X 2408  
stines.cg@pg.com

# Permit Section: 1

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

This section contains a descriptive summary and statement of basis.

Compliance Certification is not applicable to this summary information

# Permit Section: 2

## Permitted Equipment and Applicable Requirements Table

This is a summary of requirements.

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

Compliance Certification is not applicable to this summary information.

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# Permit Section: 3



Permitted Throughput and Consumption Limit Table



Ventura County Air  
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## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2021 - December 31, 2021**

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

# Permit Section: 4

## Permitted Emissions Table

This is a summary of requirements.

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

Compliance Certification is not applicable to this summary information.

# Permit Section: 5

## Exempt Equipment List (Insignificant Activities Table)

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



# Permit Section: 6

Specific Applicable Requirements (Attachments)



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### ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

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<b>A. Attachment # or Permit Condition #:</b> Section 6 - 74.9 N7	<b>D. Frequency of monitoring:</b> Monthly
<b>B. Description: Stationary Combustion Engines</b>  Condition 1 - Emergency or Maintenance Engine Operation <50 hrs/calendar yr  Condition 2- Emergency Engines equipped with operating, non resettable, elapsed hour meters.  Condition 3 - Records for each emergency engine should include: Engine manufacturer, model number, operator identification number and location.  Condition 4 - Report annual hours of maintenance operation to the District annually by Feb 15.	<b>E. Source test reference method</b> N/A
<b>C. Method of monitoring:</b> Condition 1 – Fire/Emergency and Maintenance hr run times tracked in monthly log  Condition 2 – All engines are equipped with a non-resettable hour meter  Condition 3 & 4 - Emergency Diesel Engine Annual Report forms are submitted to the District	<b>F. Currently in Compliance?</b> YES  <b>G. Compliance Status:</b> CONTINUOUS  <b>H. *Excursions, Exceedence, or other non-compliance:</b> NO



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<p><b>A. Attachment # or Permit Condition #:</b> Section 6 - 74.15 N.1</p>	<p><b>D. Frequency of monitoring:</b> Biennial</p>
<p><b>B. Description: Boilers, Heater Treaters, Steam Generators, and Process Heaters</b></p> <p>Condition 1 – Emissions: NOx &lt; 40 ppmvd, CO &lt; 400 ppmvd</p> <p>Condition 2 – Source Tested every 24 months using ARB Method 100</p> <p>Condition 3.a-b - Alternate Fuel Use limitations</p> <p>Condition 4 – Startup emissions exemption</p> <p>Condition 5 – Recordkeeping: Alternate Fuels, Biennial Source test report</p> <p>Condition 6 – Flue Gas Recirculation requirements per Section 7</p>	<p><b>E. Source test reference method:</b> <b>Source Test Summary Form 1 of 4</b></p> <p><b>ARB Method 100:</b> <b>NOx</b> <b>CO</b> <b>Stack Gas O2</b></p>
<p><b>C. Method of monitoring:</b> Condition 1 &amp; 2 -3/3/2020 Source Test demonstrated compliance</p> <p>Condition 3 – Only Natural Gas was used for the 2021 calendar year.</p> <p>Condition 4 – Instructional Condition; Certification not applicable.</p> <p>Condition 5 – No alternate fuel utilized. Source Test report furnished to District on time.</p> <p>Condition 6 – Compliance with applicable Section 7 flue gas recirculation requirements.</p>	<p><b>F. Currently in Compliance? YES</b></p> <p><b>Intermittent</b></p> <p><b>H. *Excursions, Exceedence, or other non-compliance: Yes</b></p> <p><b>NOV no. 24308 issued for failed source test on 3/2/20</b></p>



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



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<p>A. Attachment # or Permit Condition #: Section 6 – Attachment 74.34N2 (12/13/2016)</p>	<p>D. Frequency of monitoring: <b>Monthly</b></p>
<p>B. Description: NOx Reductions from Miscellaneous Sources</p> <p>Condition 1- Perform combustion system maintenance in accordance with manufacturer's written instructions/specifications or according to good engineering practices focused on reliability and emission controls.</p> <p>Condition 2 - Document maintenance activities in a site specific combustion and emission controls systems maintenance plan. The plan must be kept onsite and available to the APCD upon request.</p> <p>Condition 2 - Maintain records of combustion system maintenance and make available to APCD upon request</p>	<p>E. Source test reference method: N/A</p>
<p>C. Method of monitoring: Condition 1 &amp; 2 - Combustion system maintenance was performed for all applicable units in accordance with a site written plan and is available upon request.</p>	<p>F. Currently in Compliance? <b>YES</b></p>
<p>Condition 3 - Maintenance records including manufacturer's inspection reports for 2021 are on file and available upon request.</p>	<p>G. Compliance Status: <b>CONTINUOUS</b></p>
	<p>H. *Excursions, Exceedence, or other non-compliance: <b>NO</b></p>



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



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**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

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<p><b>A. Attachment # or Permit Condition #:</b> Section 6 – Attachment STRMLN15LM6000-NOx-rev291</p>	<p><b>D. Frequency of monitoring:</b> <b>Monthly</b></p>
<p><b>B. Description: LM6000 Gas Turbine Based Cogeneration Unit</b></p> <p><u>Condition 1, 2, 4, &amp; 6</u> - NOx &lt; 2.5 ppmvd avg. @ 15% O2 over 3 hr. period, Annual Source Test, and CEMs, ROC &lt;2.0 ppmvd @ 15% O2 average over 3 consecutive hrs. Operate Oxidation Catalyst &amp; test annually, Outlet Ammonia &lt; 20 ppmvd verified annually via source test, PM &lt; 3.08 lbs/MMscf &amp; source test using ARB Method 5 upon District request</p> <p><u>Condition 3:</u> Emissions Exemption: 12 hr cold startup, 3 hr normal-startup, 2 hr unplanned load changes, and 1 hr shutdown</p> <p><u>Condition 5.a-f</u> - Source Test Annually at normal operating load. Test Notification and protocol submitted 15 days in advance with report submitted within 45 days of test to include permit specified parameters</p> <p><u>Condition 7.a-l &amp; 8.a-c</u> - Operate and maintain CEMs &amp; record permit specified data, CEMs calibration and maintenance per 40 CFR, part 51, Appendix P, Sections 3.0 through 3.9.5</p> <p><u>Condition 9</u> - Written Notification of monitored emission standards violations within 96 hours</p> <p><u>Condition 10.a-d &amp; 11</u> - Permanent CEMs records, to include permit specified data, Upon request submit CEMs data to District</p> <p><u>Condition 12 &amp; 13</u> - CEMs data reduced per 40 CFR, part 51, appendix P, paragraphs 5.0 – 5.3.3. Records maintained per permit conditions</p> <p><u>Condition 14.a-b</u> - Turbine Operating hours report &amp; annual source test report</p>	<p><b>E. Source test reference method</b> <b>Source Test Summary Form 2 of 4</b></p> <p>EPA Method 20 -NOx ARB Method 100 -CO, O2 EPA Method 18 -ROC ASTM Method D 3588-91 - Fuel HV BAAQMD Method ST-1B-NH3</p>
<p><b>C. Method of monitoring:</b></p> <p>Condition 1, 2, 4, 5, &amp; 6 – Annual source test conducted on March 3, 2021.</p> <p>Condition 2, 7, 10, 11, 13 – Recordkeeping.</p> <p>Condition 3 – Exemptions applied as required throughout the calendar year.</p> <p>Condition 5 – Utilize certified Source Test vendors, use specified test methods, and submit documentation per deadline requirements.</p> <p>Condition 8 - Maintenance via operators with assistance from CEM manufacturer.</p> <p>Condition 9 – Operational procedures ensure compliance with 96 hour reporting requirement.</p> <p>Condition 12 – Data Acquisition System data reduction and recordkeeping per specification.</p> <p>Condition 14 – Turbine report submitted semi-annually, source test submitted annually.</p>	<p><b>F. Currently in Compliance?</b> <b>YES</b></p> <p><b>G. Compliance Status:</b> <b>CONTINUOUS</b></p> <p><b>H. *Excursions, Exceedence, or other non-compliance:</b> <b>NO</b></p>



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**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2021 - December 31, 2021**

<p><b>A. Attachment # or Permit Condition #:</b> Section 6 – Attachment STRMLN15LM2500-NOx,CO-rev 391</p>	<p><b>D. Frequency of monitoring:</b> <b>Monthly</b></p>
<p><b>B. Description: GE LM-2500 Gas Turbine Based Cogeneration Unit NOx and CO Applicable Requirements</b></p> <p>Condition 1 – 3 Hour NOx average &lt; 24 ppmvd @ 15% O2 while burning Natural Gas          Condition 2 – Emissions Exemption: 1 hr for startup &amp; shutdown          Condition 3 – Source Test Annually at normal operating load. Test Notification and protocol submitted 15 days in advance with report submitted within 45 days after test to include permit specified parameters.          Condition 4 – Operate and maintain CEMs &amp; record permit specified data.          Condition 5 – CEMs calibration and maintenance per 40 CFR, part 51, Appendix P, Sections 3.0 through 3.9.5.          Condition 6 – Written Notification of emissions violations within 96 hours.          Condition 7 – Permanent CEMs records, to include permit specified data.          Condition 8 – Upon request submit CEMs data to District.          Condition 9 – CEMs data reduced per 40 CFR, part 51, appendix P, paragraphs 5.0 – 5.3.3.          Condition 10 – Records maintained per permit conditions.          Condition 11 – Turbine Operating hours report &amp; annual source test report.</p>	<p><b>E. Source test reference method</b> <b>See Source Test Summary Form 3 of 4</b></p> <p>EPA Method 20 -NOx          ARB Method 100 -CO, O2          ASTM Method D 3588-91 - Fuel HV</p>
<p><b>C. Method of monitoring:</b></p> <p>Condition 1, 3 – Annual source test conducted on May 20, 2021          Condition 1, 2, 4, 7, 8, 9, 10 – Recordkeeping          Condition 5 – Maintenance via operators with assistance from CEMs manufacturer          Condition 6 – Operational procedures ensure compliance with 96 hour reporting requirement          Condition 11 – Turbine report submitted semi-annually, source test submitted annually</p>	<p><b>F. Currently in Compliance?</b> <b>YES</b></p> <p><b>G. Compliance Status:</b> <b>CONTINUOUS</b></p> <p><b>H. *Excursions, Exceedence, or other non-compliance:</b> <b>NO</b></p>





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**Period Covered by Compliance Certification: January 1, 2021 - December 31, 2021**

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



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### ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2021 - December 31, 2021**

A. Attachment # or Permit Condition #: Section 6 – Attachment NESHAP KK	D. Frequency of monitoring: <b>Monthly</b>
B. Description: 40 CFR Part 63 Subpart KK Applicable Requirements  Condition 1 – Use < 10 Ton per 12 month rolling period of each HAP  Condition 2 – Use < 25 tons total per 12 month rolling period for all HAPs  Condition 3 – HAP exclusion for various activities  Condition 4 – Considered Area Source if it complies with HAP limitations  Condition 5 – Maintain monthly records and calculations of HAP materials and their HAP fractions  Condition 6 – Provided 40 CFR 63.9(b) Notification	E. Source test reference method <b>N/A</b>
C. Method of monitoring: Conditions 1 – 6: In 2021, site maintained non-major HAP status by emitting less than 10 TPY of any one HAP and less than 25 TPY of all HAPs. HAP emission and mass fraction monthly records are maintained as required by permit condition.	F. Currently in Compliance? <b>YES</b>  G. Compliance Status: <b>CONTINUOUS</b>  H. *Excursions, Exceedence, or other non-compliance: <b>NO</b>



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### ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

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



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**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

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<p>A. Attachment # or Permit Condition #: Section 6 - Attachment 40CFR63 ZZZZN3</p>	<p>D. Frequency of monitoring: <b>Monthly</b></p>
<p>B. Description: 40 CFR Part 63 Subpart ZZZZ Applicable Requirements</p> <p><u>Condition 1</u>: Meet work practice standards including annual oil and filter changes, air cleaner inspections and belt/hose inspections. Report any delays due to emergency use to APCD.</p> <p><u>Condition 2</u>: Operate and maintain IC engines according to manufacturer's emission related instructions or per site plan to maintain and operate equipment consistent with good air pollution control practices.</p> <p><u>Condition 3</u>: RICE must be equipped with non-resettable hour meter.</p> <p><u>Condition 4</u>: Minimize idle time during startup and minimize startup time to safe engine loading time, not to exceed 30 minutes.</p> <p><u>Condition 5</u>: Limit non-emergency use of engines to no more than 100 hours per calendar year for maintenance and readiness testing and other allowed uses. Within this 100 hour allowance, limit hours for non-emergency non-maintenance/readiness testing (uses outlined in 63.6640 (f) ) to no more than 50 hours per calendar year.</p> <p><u>Condition 6</u>: Maintain records of maintenance conducted on stationary emergency RICE and record hours of operation for emergency use and non-emergency uses to demonstrate compliance with Condition 5.</p> <p><u>Condition 7 &amp; 8</u>: Non applicable condition - the site does not operate RICE for emergency demand response.</p> <p><u>Condition 9</u>: Annually certify that all engines operate in compliance with 40 CFR Part 63 Subpart ZZZZ.</p>	<p>E. Source test reference method <b>N/A</b></p>
<p>C. Method of monitoring:</p> <p><u>Condition 1</u>: Maintain records to demonstrate that annual oil and filter changes, air cleaner inspections and annual belt/hose inspections are completed. Report any delays due to emergency use to APCD.</p> <p><u>Condition 2</u>: Operate and maintain IC engines according to site plans for maintenance and operation consistent with good air pollution control practices.</p> <p><u>Condition 3</u>: RICE are currently equipped with non-resettable hour meters.</p> <p><u>Condition 4</u>: Minimize idle time during startup and minimize startup time to safe engine loading time, not to exceed 30 minutes</p> <p><u>Condition 5</u>: Compliance with hour limitations is demonstrated by records of hours of operation for emergency, non-emergency and non-emergency/non- maintenance or readiness testing use.</p> <p><u>Condition 6</u>: Maintain records of maintenance conducted on stationary emergency RICE and record hours of operation for emergency use and non-emergency uses to demonstrate compliance with Condition 5.</p> <p><u>Conditions 7 &amp; 8</u>: Non-applicable condition - the site does not operate RICE for emergency demand response.</p> <p><u>Condition 9</u>: Annual Subpart ZZZZ compliance certification is satisfied by the ACC</p>	<p>F. Currently in Compliance? <b>YES</b></p> <p>G. Compliance Status: <b>CONTINUOUS</b></p> <p>H. *Excursions, Exceedence, or other non-compliance: <b>NO</b></p>

# Permit Section: 7

Permit Specific Conditions (Attachments)



**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2021 - December 31, 2021**

<p><b>A. Attachment # or Permit Condition #:</b> Section 7 – Attachment PO00015PC1-rev411, 431, 441</p>	<p><b>D. Frequency of monitoring: Monthly</b></p>
<p><b>B. Description: Throughput &amp; Consumption Limits and Solvent Records</b></p> <p>Condition 1 – Maintain Monthly throughput (emissions) records as detailed in Section No. 3 "Permitted Throughput and Consumption Limit Table.</p> <p>Condition 2 – Maintain a list of all exempt solvents used , a reference to the specific permit exemption status and their ROC content and pounds used per rolling 12 month period.</p> <p>Condition 3 - Permission to operate a rental boiler that is &lt; 100 MMBTU/hr as an alternative to operating the 100 MMBTU/hr B-301 Boiler for up to 12 months. While in use, PO00015PC2 shall apply and PO00015PC4 shall not apply. The temporary boiler shall be equipped with Low NOx burners to meet the PO00015PC2 emissions limitations for the B-301 Boiler and the permittee shall maintain documentation that the temporary boiler meets the required emission limitations and records of usage of the temporary rental boiler.</p>	<p><b>E. Source test reference method</b>  N/A</p>
<p><b>C. Method of monitoring:</b></p> <p>Condition 1 – Monthly records of emissions specified in Table 3 throughput column are recorded.</p> <p>Condition 2 – Exempt Solvent list maintained.</p> <p>Condition 3 - Rental boiler was not used during this reporting period.</p>	<p><b>F. Currently in Compliance?</b> <b>YES</b></p> <p><b>G. Compliance Status:</b> <b>CONTINUOUS</b></p> <p><b>H. *Excursions, Exceedance, or other non-compliance:</b> <b>NO</b></p>



**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

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<p><b>A. Attachment # or Permit Condition #:</b> Section 7 – Attachment PO00015PC2-rev 411, 431, 441</p>	<p><b>D. Frequency of monitoring:</b> <b>Monthly</b></p>
<p><b>B. Description: Combustion Emissions Units- LM6000, LM2500, B&amp;W Steam Boiler, 1X Hot Air, 1X Yankee Furnace, 2X Furnaces</b></p> <p>Condition 1 – Specifies monitoring requirements and calculations to demonstrate compliance with TPY emissions limits for Combustion Unit group identified in this condition.          Condition 2 – Restricts fuel used in specified combustion units to Natural Gas (NG)          Condition 3 – Maintain records: 12 mo. Rolling average fuel usage and emissions based on Emission Factors and CEM units specified in this condition and condition 1 above.          Condition 4 - The Table 4 CO hourly lb./hour for the LM2500 shall be demonstrated by the annual source test requirement in STRMLIN15LM2500-NOx, CO.          Condition 5 - The Table 4 CO hourly lb./hour for the LM600 shall be demonstrated by the annual source test requirement in STRMLIN15LM6000-NOx.          Condition 6 - Permission to operate a rental boiler that is &lt; 100 MMBTU/hr as an alternative to operating the 100 MMBTU/hr B-301 Boiler for up to 12 months. While in use, PO00015PC2 shall apply and PO00015PC4 shall not apply. The temporary boiler shall be equipped with Low NOx burners to meet the PO00015PC2 emissions limitations for the B-301 Boiler and shall maintain documentation that the temporary boiler meets the B-301 emission limitations and records of usage of the temporary rental boiler.</p>	<p><b>E. Source test reference method</b> <b>N/A</b></p>
<p><b>C. Method of monitoring:</b></p> <p>Condition 1 – Monthly monitoring of emissions records to ensure compliance with combustion emission limits.          Condition 2 – Facility exclusively utilized PUC Natural Gas to fire all permitted combustion units at facility.          Condition 3 - CEMS data from the turbines is used to maintain 12 month rolling averages for NOx, CO, and NH3. All other 12 month rolling averages are maintained by Emission Factors and fuel use.          Condition 4 &amp; 5 - Source Test records demonstrating the Table 4 limits for each turbine was performed and submitted per the STRMLN Requirements for each turbine.          Condition 6 - Alternative Operating Scenario was not utilized in RY2021</p>	<p><b>F. Currently in Compliance?</b> <b>YES</b></p> <p><b>G. Compliance Status:</b> <b>CONTINUOUS</b></p> <p><b>H. *Excursions, Exceedance, or other non-compliance:</b> <b>NO</b></p>



**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2021 - December 31, 2021**

<p><b>A. Attachment # or Permit Condition #:</b></p> <p>Section 7 – Attachment PO00015PC3-rev351</p>	<p><b>D. Frequency of monitoring:</b>          Condition 2 - Semi Annual          Condition 3 - Permit Term          Condition 4 - Bi Annual</p>
<p><b>B. Description: 2X Papermachine Hot Air Furnace and "Yankee" Hood Furnace Requirements</b></p> <p>Condition 1 –Emission limitations: NOx &lt; 0.08 lb./MMBTU, CO &lt; 0.045 lb./MMBTU</p> <p>Condition 2 –Fuel and air settings locked in position as specified in permit. Settings recorded every 6 months</p> <p>Condition 3 – Source test the Pre Dryer Hot Air Furnace and Yankee Hot Air Furnace once every 24 months using ARB Method 100 for NOx, CO and O2. Notification &amp; Test Protocol to District 15 days in advance. Report within 45 after test before May 26, 2022 using ARB Method 100 for NOx, CO and O2. Notification &amp; Test Protocol to District 15 days in advance. Report within 45 after test.</p>	<p><b>E. Source test reference method:</b>  <b>ARB Method 100:</b>          NOx          CO          Stack Gas O2  <b>See Source Test Form 4 of 4</b></p>
<p><b>C. Method of monitoring:</b></p> <p>Condition 1 - Both Furnaces demonstrated compliance to the NOx and CO limits per their last Source Test 5/26/20</p> <p>Condition 2 – Fuel Linkage settings for the Yankee and Hot Air Furnaces were monitored in January and July to meet requirement</p> <p>Condition 3 - Condition requirements were met as demonstrated in the most recently submitted Source Test Report.</p>	<p><b>F. Currently in Compliance?</b>  <b>YES*</b></p> <p><b>G. Compliance Status:</b>  <b>INTERMITTENT**</b></p> <p><b>H. *Excursions, exceedances, or other non-compliance:</b></p> <p>Possible exception to continuous compliance***          *See deviation summary</p>





Ventura County Air  
Pollution Control  
District

### ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2021 - December 31, 2021**

<b>A. Attachment # or Permit Condition #:</b> Section 7 – Attachment PO00015PC4 –rev 411, 431, 441	<b>D. Frequency of monitoring:</b> <b>Monthly</b>
<b>B. Description: Flue Gas Recirculation (FGR) Requirements for Babcock &amp; Wilcox Steam Boiler</b>  Condition 1.a-b – FGR system settings locked (physically pinned) in place per permit specifications. Parameters to be monitored, measured, and recorded on monthly basis.	<b>E. Source test reference method</b> <b>N/A</b>
<b>C. Method of monitoring:</b> Parameters to be monitored, measured, and recorded on monthly basis.	<b>F. Currently in Compliance?</b> <b>YES</b> <b>G. Compliance Status:</b> <b>CONTINUOUS</b> <b>H. *Excursions, Exceedance, or other non-compliance:</b> <b>NO</b>



**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2021 - December 31, 2021**

<p><b>A. Attachment # or Permit Condition #:</b> Section 7 – Attachment PO00015PC5-rev 441</p>	<p><b>D. Frequency of monitoring:</b> <b>Monthly</b></p>
<p><b>B. Description: Particulate Matter Emission Requirements 1X Paper Machine, 2X Paper Machine, Wet Lapper and Converting Line Rooms</b></p> <p>Condition 1: Emission Limitations: 1X PM &lt; 6.75 lbs/hr., 2X PM &lt; 3.99 lbs/hr., Wet Lapper &lt; 0.10</p> <p>Condition 2: To demonstrate compliance with emission limitations, daily average of hourly readings of scrubber pressure drop and liquor flow rate for 1X, 2X and wet lapper scrubbers shall be recorded and maintained no less than the values specified in this condition.</p> <p>Condition 3.a-e: Daily Record not required for less than full day operation. Excursions to be corrected expeditiously, meters and gauges maintained per facility plan, and made available upon request. Excursions require summary of corrective actions. Semi annual report of Excursions.</p> <p>Condition 4.a-b: PM emissions must meet limitations specified in Rules 52 and 53 (table limits in each rule)</p> <p>Condition 5: Compliance with Rule 52 &amp; 53 achieved with compliance with Condition 1 and 2</p> <p>Condition 6: Converting room emissions shall be re-circulated back into room</p>	<p><b>E. Source test reference method</b> N/A</p>
<p><b>C. Method of monitoring:</b></p> <p>Condition 1-2, 4-5: 1X, 2X, and Wet Lapper Scrubber operation to ensure Pressure Drop, and Liquor Flow Rate are not less than the permit specified values.</p> <p>Condition 3 –Records of Hourly and Daily operation kept. Permittee will respond to any excursion as specified in the permit and will document and submit corrective action in the Semi Annual Report as required by the permit.</p> <p>Condition 6 – Converting Room emissions are circulated back into room via equipment listed in the Section 5 Insignificant Activities List.</p>	<p><b>F. Currently in Compliance?</b> <b>YES</b></p> <p><b>G. Compliance Status:</b> <b>CONTINUOUS</b></p> <p><b>H. *Excursions, Exceedance, or other non-compliance:</b> <b>NO</b></p>



### ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2021 - December 31, 2021**

<b>A. Attachment # or Permit Condition #:</b> Section 7 – Attachment PO00015PC6-rev351	<b>D. Frequency of monitoring:</b> <b>Monthly</b>
<b>B. Description: ROC Emission Requirements Manufacturing Chemicals for Ink and Additive Applications</b>  Condition 1 – ROC Emission limit for manufacturing chemicals used in inks and additives for producing, converting, and packaging toilet tissue and paper towels shall not exceed 60 tons per year in any 12 month period.  Condition 2 – Maintain monthly records of ROC emissions from manufacturing chemicals used in inks and additives for producing, converting and packaging toilet tissue and paper towels and demonstrate compliance based on 12-month rolling average emissions.	<b>E. Source test reference method</b> <b>N/A</b>
<b>C. Method of monitoring:</b>  Condition 1 – Facility ROC emissions rates are recorded and tracked to ensure 12 month rolling totals maintained below 60 TPY  Condition 2 – Maintain monthly usage data for ROC containing manufacturing chemicals	<b>F. Currently in Compliance?</b> <b>YES</b>  <b>G. Compliance Status:</b> <b>CONTINUOUS</b>  <b>H. *Excursions, Exceedance, or other non-compliance:</b> <b>NO</b>



**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2021 - December 31, 2021**

<b>A. Attachment # or Permit Condition #:</b> Section 7 -- Attachment PO00015PC7-rev391	<b>D. Frequency of monitoring:</b> <b>Monthly</b>
<b>B. Description: Federal PSD Permit Requirements- Cogeneration Turbine (LM-6000), Cogeneration Turbine (LM-2500), Babcock &amp; Wilcox Steam Boiler, 1X Paper Machine Hot Air Furnace, and 1X Papermachine "Yankee" Hood Furnace</b>  Condition 1 – If request increase in permitted NOx emissions for specified combustion sources above 250 TPY, submit PSD application for LM6000 turbine	<b>E. Source test reference method</b> <b>N/A</b>
<b>C. Method of monitoring:</b>  Condition 1 – If request increase in NOx emissions in excess of 250 TPY, will submit PSD application for LM6000 turbine.	<b>F. Currently in Compliance?</b> <b>YES</b>
	<b>G. Compliance Status:</b> <b>CONTINUOUS</b>
	<b>H. *Excursions, Exceedance, or other non-compliance:</b> <b>NO</b>



### ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2021 - December 31, 2021**

**A. Attachment # or Permit Condition #:**

Section 7 – Attachment PO00015PC8

**D. Frequency of monitoring:**  
**Monthly**

**B. Description: ERC Certificate No. 1166**

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

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

**C. Method of monitoring:**

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

**F. Currently in Compliance?**  
**YES**

**G. Compliance Status:**  
**CONTINUOUS**

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

# Permit Section: 8

General Applicable Requirements (Attachments)



**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2021 - December 31, 2021**

<p><b>A. Attachment # or Permit Condition #:</b> Section 8 – Attachment Rule 50 (8/20/2020)</p>	<p><b>D. Frequency of monitoring:</b> <b>Monthly</b></p>
<p><b>B. Description: Opacity</b></p> <p>Condition 1 – Do not discharge into the atmosphere any air contaminants for &gt; 3 minutes in one hour which are as dark or darker than No. 1 on the Ringleman Chart or equal to or greater than 20% Opacity</p> <p>Condition 2 – Periodic "Quarterly" Surveillance and record of visible emissions other than uncombined water</p> <p>Condition 3 – Annual compliance certification, including site survey</p> <p>Condition 4 – Per District Request, Opacity is determined by a person certified in reading smoke using EPA Method 9 or a certified and calibrated monitoring system</p>	<p><b>E. Source test reference method:</b> <b>N/A</b></p>
<p><b>C. Method of monitoring:</b></p> <p>Condition 1 &amp; 2 – No visible emissions were observed in 2021</p> <p>Condition 3 - Periodic Opacity Survey completed on 3/19,21, 4/13/21, 10/28/2021</p> <p>Condition 4 - Per District request, a certified, calibrated monitoring system or a person certified in EPA Method 9 will determine Opacity</p>	<p><b>F. Currently in Compliance?</b> <b>YES</b></p> <p><b>G. Compliance Status:</b> <b>CONTINUOUS</b></p> <p><b>H. *Excursions, Exceedence, or other non-compliance:</b> <b>NO</b></p>



**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2021 - December 31, 2021**

<p><b>A. Attachment # or Permit Condition #:</b> Section 8 – Attachment 54.B.1 (01/14/14)</p>	<p><b>D. Frequency of monitoring:</b> <b>Monthly</b></p>
<p><b>B. Description: Sulfur Compounds – Sulfur Emissions from Combustion Operations at Point of Discharge</b></p> <p>Condition 1 – Point of Discharge SO<sub>2</sub> concentrations &lt; 300 ppmvd (corrected to 3% oxygen for boilers and 15% oxygen for turbines), from combustion operations specified.</p> <p>Condition 2 – Comply with fuel Sulfur content limits per Rule 64. No monitoring required.</p> <p>Condition 3 – Upon District Request determine point of Discharge concentrations of SO<sub>2</sub></p>	<p><b>E. Source test reference method:</b> <b>N/A</b></p>
<p><b>C. Method of monitoring:</b></p> <p>Condition 1 – Compliance with permit condition Attachment P00015PC2. Only PUC-quality natural gas and CARB approved diesel used on site in 2021</p> <p>Conditions 2 – Fuel Oil Sulfur Content provided by supplier at each delivery. Gaseous sulfur content meeting PUC Quality requirements. Data furnished to district upon request.</p> <p>Condition 3 – Furnish District with data upon request.</p>	<p><b>F. Currently in Compliance?</b> <b>YES</b></p> <p><b>G. Compliance Status:</b> <b>CONTINUOUS</b></p> <p><b>H. *Excursions, Exceedence, or other non-compliance:</b> <b>NO</b></p>





**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2021 - December 31, 2021**

<p><b>A. Attachment # or Permit Condition #:</b> Section 8 - Attachment 54.B.2 (01/14/14)</p>	<p><b>D. Frequency of monitoring:</b> <b>Monthly</b></p>
<p><b>B. Description: Sulfur compounds – SO2 Concentrations</b></p> <p>Condition 1 – Property Line SO2 concentrations: 1 hr. &lt; 0.25 ppmvd, 24 hr. &lt; 0.04 ppmvd</p> <p>Condition 2 - Property line 1 hour sulfur dioxide limit of 0.075 ppm</p> <p>Condition 3 – Provide fuel or exhaust analysis along with modeling data or other demonstration to District upon request</p> <p>Condition 4a-c – Upon District Request determine ground level concentrations of SO2</p>	<p><b>E. Source test reference method:</b> <b>N/A</b></p>
<p><b>C. Method of monitoring:</b></p> <p>Condition 1 - Compliance with permit condition Attachment P00015PC2. Only PUC-quality natural gas, and CARB approved diesel used on site in 2021</p> <p>Conditions 2 – If the District requires ambient air monitoring, test methods specified will be employed.</p> <p>Conditions 3 - Fuel Analysis provided by suppliers at request of facility. Exhaust analysis based on emissions factors incorporated into facility AB2588 Health Risk Assessment.</p> <p>Condition 4– Furnish District with data upon request.</p>	<p><b>F. Currently in Compliance?</b> <b>YES</b></p> <p><b>G. Compliance Status:</b> <b>CONTINUOUS</b></p> <p><b>H. *Excursions, Exceedence, or other non-compliance:</b> <b>NO</b></p>



**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2021 - December 31, 2021**

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



### ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2021 - December 31, 2021**

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



**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2021 - December 31, 2021**

<b>A. Attachment # or Permit Condition #:</b> Section 8 – Attachment 64.B.1 (04/13/99)	<b>D. Frequency of monitoring:</b> <b>Monthly</b>
<b>B. Description: Sulfur Content of Fuels – Gaseous Fuel Requirements</b>  Condition 1 – Gaseous Fuel sulfur compounds < 788 ppmvd  Condition 2 – Periodic Monitoring not required if using PUC Natural Gas  Condition 3 – Analyze fuel if using non-PUC quality fuel  Condition 4a-b – Monitoring required if landfill or oilfield gaseous fuel is used	<b>E. Source test reference method:</b> <b>N/A</b>
<b>C. Method of monitoring:</b> Conditions 1-4: Maintain records showing that only PUC Quality natural gas is used, therefore no other monitoring is required. Facility does not use landfill or oilfield gaseous fuel.	<b>F. Currently in Compliance?</b> <b>YES</b>  <b>G. Compliance Status:</b> <b>CONTINUOUS</b>  <b>H. *Excursions, Exceedence, or other non-compliance:</b> <b>NO</b>



**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2021 - December 31, 2021**

<b>A. Attachment # or Permit Condition #:</b> Section 8 – Attachment 64.B.2 (04/13/99)	<b>D. Frequency of monitoring:</b> <b>Monthly</b>
<b>B. Description: Sulfur Content of Fuels – Liquid Fuel Requirements</b>  Condition 1 – No liquid Fuel usage with sulfur content > 0.5% by weight  Condition 2 – If only use ARB quality liquid fuel compliance is assured without monitoring  Condition 3 – Requirements for use of non ARB liquid fuels	<b>E. Source test reference method:</b> <b>N/A</b>
<b>C. Method of monitoring:</b> Conditions 1 & 2 – Maintain records of exclusive use of ARB compliant liquid fuel used on site in 2021 – No other monitoring is required.  Condition 3 – Monitor per permit requirements if use non-ARB quality liquid fuel	<b>F. Currently in Compliance?</b> <b>YES</b>  <b>G. Compliance Status:</b> <b>CONTINUOUS</b>  <b>H. *Excursions, Exceedence, or other non-compliance:</b> <b>NO</b>



**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2021 - December 31, 2021**

<p><b>A. Attachment # or Permit Condition #:</b> Section 8 – Attachment 74.6 (03/15/19)</p>	<p><b>D. Frequency of monitoring:</b> <b>Monthly</b></p>
<p><b>B. Description: Surface Cleaning and Degreasing</b></p> <p><u>Condition 1.a-c:</u> Limitations on use of solvents in surface cleaning. Solvents used for equipment cleanup and other cleanup of uncured coatings, adhesives, inks or resins and used for cleaning of electronic components shall not exceed &lt; 900 g/l ROC &amp; &lt; 33 mmHg partial pressure. Cleaning solvents used for other purposes shall not exceed 25 g/l as applied.</p> <p><u>Condition 2.a-d:</u> If use solvents &gt; 25 g/l ROC are used, one of the specified cleaning methods must be employed. Specified methods include wipe cleaning; non-atomized solvent flow, dip, or flush with solvent collection and solvent capacity of less than 1 liter (unless cleaning equipment stated in conditions 8-10 are used), or solvent application from hand held spray or squirt bottle with a capacity of less than one liter; or use of enclosed gun washer.</p> <p><u>Condition 3:</u> No liquid cleaning solvent leaks from equipment or containers.</p> <p><u>Condition 4:</u> No solvents shall be solicited, supplied, sold, or used that would violate Rule 74.6.</p> <p><u>Condition 5:</u> Use less than one gallon of halogenated solvents per week for cold cleaning. If use maintain records.</p> <p><u>Condition 6:</u> Solvent stored in non-absorbent containers and closed except for filling or emptying.</p> <p><u>Condition 7:</u> Dispose of solvents and solvent residues as specified in California Hazardous Waste Code.</p> <p><u>Condition 8.a-f:</u> Cold Cleaning equipment requirements, except for remote reservoir cold cleaners.</p> <p><u>Condition 9.a-e:</u> Remote Reservoir cold cleaner equipment requirements.</p> <p><u>Condition 10.a-g:</u> Cold Cleaner operating requirements.</p> <p><u>Condition 11.a-h:</u> Rule 74.6 exemptions</p> <p><u>Condition 12.a-o:</u> Condition 1 exemptions</p> <p><u>Condition 13:</u> Condition 1 and 2 exemptions</p> <p><u>Condition 14.a-d:</u> Solvent Material recordkeeping requirements. Upon district request, make information available to district personnel</p> <p><u>Condition 15:</u> Maintain records and perform routine surveillance of solvent cleaning activities</p>	<p><b>E. Source test reference method:</b> <b>N/A</b></p>
<p><b>C. Method of monitoring:</b></p> <p>Conditions 1–4, 6-7: Compliance for permit conditions pertaining to solvent storage and handling is satisfied via personnel training and observation. Chemical Approval System ensures conformity with solvent ROC content limits.</p> <p>Condition 5: Facility does not use halogenated cold cleaner solvents</p> <p>Conditions 8-10: Cold cleaners are exempt per section 5 of Site Title V permit.</p> <p>Condition 11: Exempted Solvents including Cold Cleaner Solvent is maintained on Surface Cleaning and Degreasing List</p> <p>Condition 14: Recordkeeping per permit requirements.</p> <p>Condition 15: Visual surveillance performed routinely. Site uses chemical approval process to confirm that only ROC content acceptable solvents are purchased and used on site.</p>	<p><b>F. Currently in Compliance?</b> <b>YES</b></p> <p><b>G. Compliance Status:</b> <b>CONTINUOUS</b></p> <p><b>H. *Excursions, Exceedence, or other non-compliance:</b> <b>NO</b></p>



### ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2021 - December 31, 2021**

<p><b>A. Attachment # or Permit Condition #:</b> Section 8 – Attachment 74.11.1 (9/11/12)</p>	<p><b>D. Frequency of monitoring:</b> <b>Monthly</b></p>
<p><b>B. Description: Large Water Heaters and Small Boilers</b></p> <p>Condition 1.a-b: Requirements for new small boilers and heaters (75-400 MBTU/hr) installed after January 1, 2013 but before January 1, 2014</p> <p>Condition 2.a-b: New units installed after January 1, 2014 which are <math>\geq 75</math> MBTU/hr and <math>\leq 400</math> MBTU/hr must meet specified NOx limits and be certified in accordance with Rule 74.11.1.C.</p> <p>Condition 3 a-b: New units installed after January 1, 2013 <math>\geq 400</math> MBTU/hr and <math>&lt; 1,000</math> MBTU/hr must meet specified NOx limits and be certified in accordance with Rule 74.11.1.C.</p> <p>Condition 4 – Maintain a list-of manufacturer, brand name, model #, heat input rating, and installation date for each applicable unit. Submit upon request.</p> <p>Condition 5 - Certify annually and include a formal survey identifying each unit and documentation of certification status.</p>	<p><b>E. Source test reference method:</b> <b>N/A</b></p>
<p><b>C. Method of monitoring:</b> Conditions 1-5: Facility does not presently utilize Heaters or Boilers that are rated at 75 – 1,000 MBTU/hr., thus facility is not subject to equipment certification, recordkeeping, and annual survey requirements</p>	<p><b>F. Currently in Compliance?</b> <b>YES</b></p> <p><b>G. Compliance Status:</b> <b>CONTINUOUS</b></p> <p><b>H. *Excursions, Exceedence, or other non-compliance:</b> <b>NO</b></p>



**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2021 - December 31, 2021**

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



# **Permit Section: 9-11**

General Requirements for Short-Term Activities (Attachments)

General Permit Conditions

Miscellaneous Federal Program Conditions



**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2021 - December 31, 2021**

<p><b>A. Attachment # or Permit Condition #:</b> Section 9 – Attachment 74.1</p>	<p><b>D. Frequency of monitoring:</b> Monthly</p>
<p><b>B. Description: Abrasive Blasting</b></p> <p>"Condition 1.a-c: Abrasive Blasting shall be conducted indoors, using specified methods</p> <p>Condition 2.a-d: For Outdoor blasting use steel or iron shot/grit or utilize specified alternate methods</p> <p>Condition 3 – Adhere to Rule 74.1.B.2 requirements for pavement marking</p> <p>Condition 4 – Stucco and concrete blasting per Rule 74.1.B.3</p> <p>Condition 5 – Use California approved and labeled materials for abrasive blasting</p> <p>Condition 6 – Comply with visible emissions standard per rule 74.1.C.2</p> <p>Condition 7 - Monitor abrasive blast operations to ensure compliance with Rule 74.1, maintain records to satisfy the information requirements in conditions 7a-e, maintain records on site, and submit to the District upon request</p> <p>"</p>	<p><b>E. Source test reference method:</b> N/A</p>
<p><b>C. Method of monitoring:</b></p> <p>Condition 1.a-c: Abrasive Blasting shall be conducted indoors, using specified methods</p> <p>Condition 2.a-d: Approved abrasive blasting material was used for outdoor blasting.</p> <p>Condition 3 – Adhere to Rule 74.1.B.2 requirements for pavement marking</p> <p>Condition 4 – No stucco or concrete blasting occurred in 2021</p> <p>Condition 5 – Use California approved and labeled materials for abrasive blasting</p> <p>Condition 6 – Comply with visible emissions standard per rule 74.1.C.2</p> <p>Condition 7.a-e: Monitoring records are maintained for each short term abrasive blast operation, when applicable</p>	<p><b>F. Currently in Compliance?</b> YES</p> <p><b>G. Compliance Status:</b> CONTINUOUS</p> <p><b>H. *Excursions, Exceedence, or other non-compliance:</b> NO</p>



**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2021 - December 31, 2021**

<p><b>A. Attachment # or Permit Condition #:</b> Section 9 – Attachment 74.2</p>	<p><b>D. Frequency of monitoring:</b> <b>Monthly</b></p>
<p><b>B. Description: Architectural Coatings</b></p> <p>Condition 1.a-c: VOC Coating content limits, less water and exempt OC's, Flat &lt;100 g/l; Nonflat &lt;150 g/l; Nonflat High Gloss &lt;250 g/l</p> <p>Condition 2 – Specialty coatings shall conform with Rule 74.2 Table of Standards. Industrial Maintenance &lt;250 g/l less water &amp; exempt OC's</p> <p>Condition 3 – Architectural coatings and cleaning materials to remain closed except when in use.</p> <p>Condition 4 – Adhere to Rule 74.2.B.1 thinning requirements</p> <p>Condition 5 – Conduct periodic facility inspections and an annual compliance certification of architectural coating operations to ensure compliance with Rule 74.2</p> <p>Condition 6 – VOC content and other properties measured per procedures in Rule 74.2.G</p>	<p><b>E. Source test reference method</b> N/A</p>
<p><b>C. Method of monitoring:</b></p> <p>Condition 1, 2 – All paints used at facility are reviewed for compliance prior to approval for use.</p> <p>Condition 3 – Closure requirements are documented / training provided to all site personnel and contractors.</p> <p>Condition 4 – The facility prohibit the thinning of paints and coatings if thinning can cause the paint or coating to exceed it's specified limit.</p> <p>Condition 5 – Visual observations occur routinely. VOC data maintained for each coating via vendor supplied SDS. Data will be furnished to District upon request.</p> <p>Condition 6 – Architectural coating properties determined using vendor supplied data.</p>	<p><b>F. Currently in Compliance?</b> <b>YES</b></p> <p><b>G. Compliance Status:</b> <b>CONTINUOUS</b></p> <p><b>H. *Excursions, Exceedence, or other non-compliance:</b> <b>NO</b></p>



Ventura County Air  
Pollution Control  
District

### ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2021 - December 31, 2021**

<b>A. Attachment # or Permit Condition #:</b> Section 9 – Attachment 74.28	<b>D. Frequency of monitoring:</b> <b>Monthly</b>
<b>B. Description: Asphalt Roofing Operations</b>  Condition 1 – Kettles shall operate with lids. Lid will not be opened unless temperature is < 150oF  Condition 2 – Max Temperatures: Asphalt < 500oF, Coal tar pitch < 400oF  Condition 3 – Lid to remained closed, and receiving containers to be covered  Condition 4 – Kettle vents to remain closed at all times  Condition 5 – Facility will verify Rule 74.28 requirements met during projects	<b>E. Source test reference method</b> <b>N/A</b>
<b>C. Method of monitoring:</b> Conditions 1-5: Internal administrative procedures. Permits and conditions were met in Rule 74.28 during 2021 roofing restoration.	<b>F. Currently in Compliance?</b> <b>YES</b>  <b>G. Compliance Status:</b> <b>CONTINUOUS</b>  <b>H. *Excursions, Exceedence, or other non-compliance:</b> <b>NO</b>



Ventura County Air  
Pollution Control  
District

## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2021 - December 31, 2021**

<b>A. Attachment # or Permit Condition #:</b> Section 9 - Attachment 40 CFR 61.M	<b>D. Frequency of monitoring:</b> <b>Monthly</b>
<b>B. Description: National Emissions Standards for Asbestos</b>  Condition 1 – Comply with 40 CFR part 61, Subpart M  Condition 2 – Adhere to 40 CFR part 61.145 requirements for Demolition and Renovation.	<b>E. Source test reference method</b> <b>N/A</b>
<b>C. Method of monitoring:</b> Condition 1 – Site Asbestos abatement program managed consistent with 40 CFR Part 61, Subpart M. State certified contractors are utilized for ACM demolition and renovation. Adherence with 40 CFR Part 61.145 is mandatory for job approval.  Condition 2 – ACM demolition and renovation are observed by site resources to ensure compliance with 40 CFR Part 61.145. Activities involving ACM recorded are filed with Site Environmental Leader. Notification is provided to District prior to ACM renovation or demolition for activities requiring notification.  No applicable activities occurred during 2021	<b>F. Currently in Compliance?</b> <b>YES</b>  <b>G. Compliance Status:</b> <b>CONTINUOUS</b>  <b>H. *Excursions, Exceedence, or other non-compliance:</b> <b>NO</b>



**ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM**

**Period Covered by Compliance Certification: January 1, 2021 - December 31, 2021**

<p><b>A. Attachment # or Permit Condition #:</b> Section 10 – District General Part 70 Permit Conditions</p>	<p><b>D. Frequency of monitoring:</b> Monthly</p>
<p><b>B. Description: District General Part 70 Permit Conditions</b></p> <p>Condition 1 – Comply with all federally enforceable conditions, and all applicable requirements specified in the permit          Condition 2 – Comply with new applicable requirements that become effective during the permit terms in a timely manner          Condition 3 – Promptly report deviations within 4 hours of detection          Condition 4 – The need to halt / reduce activity is not a defense against enforcement action          Condition 5 – Retain all required records, monitoring data and support information for at least 5 years          Condition 6 – Provide requested information to District in a timely manner          Condition 7.a-d: Facilitate permit specified District inspection rights          Condition 8 – Permit may be modified, revoked, reopened, reissued or terminated for cause          Condition 9.a-d: Permit will be reopened per permit specified reasons          Condition 10 – All fees shall be paid on timely basis          Condition 11 – Permit does not convey property rights          Condition 12 – One invalid term / condition does not invalidate the entire permit          Condition 13 – Renewal application must be submitted between 6 to 18 months prior to expiration          Condition 14 – Part 70 requires all applications, reports or other data that must be submitted per the Title V permit to be certified by the responsible official.          Condition 15 – Annual Part 70 Compliance Certification</p>	<p><b>E. Source test reference method</b> N/A</p>
<p><b>C. Method of monitoring:</b></p> <p>Condition 1, All deviations from Title V requirements are reported as required.          Condition 2, 4, 7-9, 11-12: Not applicable - Instructional conditions.          Condition 3 – Internal administrative procedures.          Condition 5 – Electronic databases and hard copy archives used for 5 year data retention.          Condition 6 – Reports submitted to district          Condition 10 – Internal Administrative procedures. Records of payments exist.          Condition 12 - 15: Internal Administrative procedures</p>	<p><b>F. Currently in Compliance?</b> YES</p> <p><b>G. Compliance Status:</b> Intermittent</p> <p><b>H. *Excursions, Exceedence, or other non-compliance:</b> NO</p>



## ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2021 - December 31, 2021**

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

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

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



### ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2021 - December 31, 2021**

A. Attachment # or Permit Condition #: Section 10 – Shield 60 IIII	D. Frequency of monitoring: <b>Monthly</b>
B. Description: Permit Shield – Stationary Compression Ignition Internal Combustion Engines Reference Information Only	E. Source test reference method <b>N/A</b>
C. Method of monitoring: Not Applicable - Reference Information only	F. Currently in Compliance? <b>YES</b>
	G. Compliance Status: <b>CONTINUOUS</b>
	H. *Excursions, Exceedence, or other non-compliance: <b>NO</b>
A. Attachment # or Permit Condition #: Section 10 – Shield 60Dc	D. Frequency of monitoring: <b>Monthly</b>
B. Description: Permit Shield – 40 CFR Part 60, Subpart Dc, "Standards of Performance for Small Industrial - Commercial - Reference Information Only	E. Source test reference method <b>N/A</b>
C. Method of monitoring: Not Applicable - Reference Information only	F. Currently in Compliance? <b>YES</b>
	G. Compliance Status: <b>CONTINUOUS</b>
	H. *Excursions, Exceedence, or other non-compliance: <b>NO</b>
A. Attachment # or Permit Condition #: Section 10 – Shield 63DDDDD	D. Frequency of monitoring: <b>Monthly</b>
B. Description: Permit Shield – NESHAP For Industrial, Commercial, and Institutional Boilers and Process Heaters Reference Information Only	E. Source test reference method <b>N/A</b>
C. Method of monitoring: Not Applicable - Reference Information only	F. Currently in Compliance? <b>YES</b>
	G. Compliance Status: <b>CONTINUOUS</b>
	H. *Excursions, Exceedence, or other non-compliance: <b>NO</b>
A. Attachment # or Permit Condition #: Section 10 – Shield 63JJJJJ	D. Frequency of monitoring: <b>Monthly</b>
B. Description: Permit Shield – NESHAP For Industrial, Commercial, and Insitutional Boiler Area Sources Reference Information Only	E. Source test reference method <b>N/A</b>
C. Method of monitoring: Not Applicable - Reference Information only	F. Currently in Compliance? <b>YES</b>
	G. Compliance Status: <b>CONTINUOUS</b>
	H. *Excursions, Exceedence, or other non-compliance: <b>NO</b>





### ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2021 - December 31, 2021**

<b>A. Attachment # or Permit Condition #:</b>  Section 10 – Attachment PO General	<b>D. Frequency of monitoring:</b> Monthly
<b>B. Description: General Permit to Operate Conditions</b> Condition 1 – Can petition Hearing Board within 30 days of receiving permit to alter conditions.	<b>E. Source test reference method</b> N/A
<b>C. Method of monitoring:</b>  Condition 1 – Reference Information only.  Condition 2 – Table 2 posted close to equipment and remainder of permit available electronically everywhere in plant.  Condition 3 – Permit and sources are not transferred or located in alternate locations.  Condition 4 – Information requested by District is furnished within requested time.	<b>F. Currently in Compliance?</b> YES  <b>G. Compliance Status:</b> CONTINUOUS <b>H. *Excursions, Exceedence, or other non-compliance:</b> NO



Ventura County Air  
Pollution Control  
District

### ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2021 - December 31, 2021**

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



Ventura County Air  
Pollution Control  
District

### ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

**Period Covered by Compliance Certification: January 1, 2021 - December 31, 2021**

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

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# Source Tests



Ventura County  
Air Pollution  
Control District

**ANNUAL COMPLIANCE CERTIFICATION  
SIGNATURE COVER FORM**

TV Permit # 00015

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

Ms. Roshni Brahmhatt  
Enforcement & Compliance Enforcement Division  
EPA Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

RECEIVED  
VENTURA COUNTY  
2022 FEB 14 PM 3:23  
A.P.C.D.

**Confidentiality**

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

**Certification by Responsible Official**

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

<p>Signature and Title of Responsible Official:</p> <p><i>Muth Bung</i></p> <p>Title: <i>Plant Manager</i></p>	<p>Date:</p> <p><i>2/11/2022</i></p>
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Time Period Covered by Compliance Certification

01 / 01 / 21 (MM/DD/YY) to 12 / 31 / 21 (MM/DD/YY)



Ventura County  
Air Pollution  
Control District

## RESPONSIBLE OFFICIAL'S CERTIFICATION FORM

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


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

Ed Swede  
Air Quality Engineer  
Ventura County Air Pollution Control District  
4567 Telephone Road, Second Floor  
Ventura, CA 93003

RECEIVED  
VENTURA COUNTY  
A.P.C.D.  
2022 FEB 14 PM 3:23

### 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 of Responsible Official:  <small>Please use the Adobe Fill &amp; Sign option to sign (click the 'Sign Here' flag to link to additional instructions)</small>	Date: 2/11/2022
Title of Responsible Official: Plant Manager	
Facility ID: 00015	



Ventura County Air  
Pollution Control  
District

## ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: January 1, 2021- December 31, 2021

A. Emission Unit Description: <b>LM6000 Turbine</b>			B. Pollutant <b>NOx</b>
C. Measured Emission Rate: <b>2.21 ppm @ 15% O2</b>	D. Limited Emission Rate: <b>2.5 ppm @ 15% O2</b>	E. Specific Source Test: <b>P27-077-FR-COMP</b>	F. Test Date <b>3/3/2021</b>

A. Emission Unit Description: <b>LM6000 Turbine</b>			B. Pollutant <b>CO</b>
C. Measured Emission Rate: <b>4.68 lb/hour</b>	D. Limited Emission Rate: <b>10.20 lb/hour</b>	E. Specific Source Test: <b>P27-077-FR-COMP</b>	F. Test Date <b>3/3/2021</b>

A. Emission Unit Description: <b>LM6000 Turbine</b>			B. Pollutant <b>O2</b>
C. Measured Emission Rate: <b>15.13 %</b>	D. Limited Emission Rate: <b>N/A</b>	E. Specific Source Test: <b>P27-077-FR-COMP</b>	F. Test Date <b>3/3/2021</b>

A. Emission Unit Description: <b>LM6000 Turbine</b>			B. Pollutant <b>Heat Rate</b>
C. Measured Emission Rate: <b>415.00 MMbtu/hour</b>	D. Limited Emission Rate: <b>N/A</b>	E. Specific Source Test: <b>P27-077-FR-COMP</b>	F. Test Date <b>3/3/2021</b>

A. Emission Unit Description: <b>LM6000 Turbine</b>			B. Pollutant <b>NH3</b>
C. Measured Emission Rate: <b>1.23 ppm @ 15% O2</b>	D. Limited Emission Rate: <b>20 ppm @ 15% O2</b>	E. Specific Source Test: <b>P27-077-FR-COMP</b>	F. Test Date <b>3/3/2021</b>

A. Emission Unit Description: <b>LM6000 Turbine</b>			B. Pollutant <b>ROC</b>
C. Measured Emission Rate: <b>0.40 ppm @ 3% O2</b>	D. Limited Emission Rate: <b>2.0 ppm @ 3% O2</b>	E. Specific Source Test: <b>P27-077-FR-COMP</b>	F. Test Date <b>3/3/2021</b>

## ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: January 1, 2021- December 31, 2021

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

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

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

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





Ventura County Air  
Pollution Control  
District

## ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: January 1, 2021- December 31, 2021

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

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

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



Ventura County Air  
Pollution Control  
District

## ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: January 1, 2021- December 31, 2021

A. Emission Unit Description: <b>LM2500 Turbine</b>			B. Pollutant <b>NOx</b>
C. Measured Emission Rate: <b>18.90 ppm @ 15% O2</b>	D. Limited Emission Rate: <b>24 ppm @ 15% O2</b>	E. Specific Source Test: <b>P27-077-FR COMP-C1</b>	F. Test Date <b>5/20/2021</b>

A. Emission Unit Description: <b>LM2500 Turbine</b>			B. Pollutant <b>CO</b>
C. Measured Emission Rate: <b>52.90 lb/hour</b>	D. Limited Emission Rate: <b>180.13 lb/hour</b>	E. Specific Source Test: <b>P27-077-FR COMP-C1</b>	F. Test Date <b>5/20/2021</b>

A. Emission Unit Description: <b>LM2500 Turbine</b>			B. Pollutant <b>O2</b>
C. Measured Emission Rate: <b>14.81 %</b>	D. Limited Emission Rate: <b>N/A</b>	E. Specific Source Test: <b>P27-077-FR COMP-C1</b>	F. Test Date <b>5/20/2021</b>

A. Emission Unit Description: <b>LM2500 Turbine</b>			B. Pollutant <b>Heat Rate</b>
C. Measured Emission Rate: <b>224.00 MMbtu/hour</b>	D. Limited Emission Rate: <b>N/A</b>	E. Specific Source Test: <b>P27-077-FR COMP-C1</b>	F. Test Date <b>5/20/2021</b>

# Deviations



Ventura County  
Air Pollution  
Control District

**RESPONSIBLE OFFICIAL'S  
CERTIFICATION FORM**

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


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

Ed Swede  
Air Quality Engineer  
Ventura County Air Pollution Control District  
4567 Telephone Road, Second Floor  
Ventura, CA 93003

RECEIVED  
VENTURA COUNTY  
A.P.C.D.  
2022 FEB 14 PM 3:23

**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 of Responsible Official:  <small>Please use the Adobe Fill &amp; Sign option to sign (click the 'Sign Here' flag to link to additional instructions)</small>	Date: 2/11/2022
Title of Responsible Official: Plant Manager	
Facility ID: 00015	



Ventura County  
Air Pollution  
Control District

**ANNUAL COMPLIANCE CERTIFICATION  
SIGNATURE COVER FORM**

TV Permit # 00015

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

Ms. Roshni Brahmhatt  
Enforcement & Compliance Enforcement Division  
EPA Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

RECEIVED  
VENTURA COUNTY  
A.P.C.D.  
2022 FEB 14 PM 3:23

**Confidentiality**

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

**Certification by Responsible Official**

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

<p>Signature and Title of Responsible Official:</p> <p><i>Mathu Borge</i></p> <p>Title: <i>Plant Manager</i></p>	<p>Date:</p> <p><i>2/11/2022</i></p>
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Time Period Covered by Compliance Certification

01 / 01 / 21 (MM/DD/YY) to 12 / 31 / 21 (MM/DD/YY)



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

February 10, 2022

Mr. Keith Macias  
AQS, Inspector  
Ventura County APCD  
4567 Telephone Road, Second Floor  
Ventura, California 93003

Subject: RY2021 Annual Title V Compliance Certification and Semi-Annual Deviation Report

Mr. Macias:

Enclosed is The Procter & Gamble Paper Products Company's Oxnard facility, Part 70 Permit No. 00015 Compliance Certification for the January 1, 2021, through December 31, 2021, reporting period. This submission also constitutes the Semi-Annual Deviation Report for the time period July 1, 2021– Dec 31, 2021.  
There were no deviations during January 1, to December 31, 2021

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

Respectfully,

Mrs. Cindy Stines  
Site Environmental Systems Leader

Cc:

Mr. Marvelle Berry, Plant Manager; P&G  
Mr. Mario Aguilar, HS&E Leader; P&G  
Mr. Armando Santana, SEL, P&G  
Ms. Chris Cote, AQS; VCAPCD



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

February 10, 2022

Ed Swede  
Air Quality Engineer  
Ventura County APCD  
4567 Telephone Road, Second Floor  
Ventura, California 93003

Subject: Semi Annual Report - Permit to Operate No. 0015  
Report of Deviations for 6/1/21 – 12/31/21

Mr. Swede,

This report satisfies our Semi-Annual reporting requirement to report deviations pursuant to District Rule 33.3.A.3. If you have any questions, please contact me, at (805) 485-8871 x 2408 or [stines.cg@pg.com](mailto:stines.cg@pg.com).

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

Respectfully,

Mrs. Cindy Stines  
Site Environmental Systems Leader

cc: Mr. Marvelle Berry, P&G, Oxnard Plant Manager  
Mr. Mario Aguilar, P&G, HSE Leader  
Mr. Armando Santana – P&G, SEL



Ventura County  
Air Pollution  
Control District

## ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 01 / 01 / 2024 (MM/DD/YY) to 12 / 31 / 2024 (MM/DD/YY)

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

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

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



**Additional Documents in Support of  
Part 70 Compliance Certification for  
RY2021**



Ventura County  
Air Pollution  
Control District

**RESPONSIBLE OFFICIAL'S  
CERTIFICATION FORM**

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


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

Ed Swede  
Air Quality Engineer  
Ventura County Air Pollution Control District  
4567 Telephone Road, Second Floor  
Ventura, CA 93003

RECEIVED  
VENTURA COUNTY  
A.P.C.D.  
2022 FEB 14 PM 3:24

**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 of Responsible Official: 		Date: 2/11/2022
<small>Please use the Adobe Fill &amp; Sign option to sign (click the 'Sign Here' flag to link to additional instructions)</small>		
Title of Responsible Official: Plant Manager		
Facility ID: 00015		



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

February 10, 2022

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

Subject: Additional Documents in Support of Part 70 Compliance Certification for Report Year 2021

Mr. Macias:

Enclosed are additional documents in support of The Procter & Gamble Paper Products Company's Oxnard facility, Part 70 Permit No. 00015 Compliance Certification for the January 1, 2021, through December 31, 2021 reporting period. If you have any questions concerning these documents or would like supplemental information not included with this submission, please contact me at your earliest convenience.

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

Respectfully,

Cindy Stines  
Site Environmental Systems Leader

Cc:

Mr. Marvelle Berry, Plant Manager; P&G  
Mr. Mario Aguilar, HS&E Leader; P&G  
Mr. Armando Santana, SEL; P&G  
Ms. Chris Cote, AQS; VCAPCD



Ventura County  
Air Pollution  
Control District

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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 of Responsible Official: 		Date: 2/11/2022
<small>Please use the Adobe Fill &amp; Sign option to sign (click the 'Sign Here' flag to link to additional instructions)</small>		
Title of Responsible Official: Plant Manager		
Facility ID: 00015		



The Procter & Gamble Paper Products Co.  
800 North Rice Ave  
Oxnard, CA 93030  
(805) 485-8871  
[www.pg.com](http://www.pg.com)

February 11, 2022

Mr. Ed Swede  
Air Quality Engineer  
Ventura County APCD  
4567 Telephone Road, Second Floor  
Ventura, CA 93003

Subject: RICE/NESHAP ZZZZ Section h Annual Reports

Dear Mr. Swede:

Enclosed are completed Annual Reports for each of the four diesel driven fire pumps managed by PTO P000015. Each report is signed and certified by the Plant Manager. The responses entered in each report reflect the fact that the requirements of 40 CFR 63.66550 (h) are not applicable to these fire pumps. These diesel-driven fire pumps are used exclusively for fire suppression and are not emergency generators.

40 CFR 63.6650 (h) requires reporting if the site has units that operate for purposes of emergency demand response under provisions of 40 CFR 63.6640 (f) (2) (II) or (iii) or 40 CFR 63.6640 (f) (4) (II). The site does not have any engines that operate for those purposes.

If you have any further questions about our site applicability to Section h, please contact me at 805-485-8871 X 2408 or email at [stines.cg@pg.com](mailto:stines.cg@pg.com)

Respectfully,

A handwritten signature in black ink that reads "Cindy Stines".

Cindy Stines  
Site Environmental Systems Leader  
Environmental Systems Leader

Enclosures: (4) RICE/NESHAP ZZZZ Section h Annual Reports



The Procter & Gamble Paper Products Co.  
800 North Rice Ave  
Oxnard, CA 93030  
(805) 485-8871  
[www.pg.com](http://www.pg.com)

February 11, 2022

Mr. Michelle Wood  
Air Compliance  
Ventura County APCD  
4567 Telephone Road, Second Floor  
Ventura, CA 93003

Subject: RICE/NESHAP ZZZZ Section h Annual Reports

Dear Ms. Wood:

Enclosed are completed Annual Reports for each of the four diesel driven fire pumps managed by PTO PO00015. Each report is signed and certified by the Plant Manager. The responses entered in each report reflect the fact that the requirements of 40 CFR 63.66550 (h) are not applicable to these fire pumps. These diesel-driven fire pumps are used exclusively for fire suppression and are not emergency generators.

40 CFR 63.6650 (h) requires reporting if the site has units that operate for purposes of emergency demand response under provisions of 40 CFR 63.6640 (f) (2) (II) or (iii) or 40 CFR 63.6640 (f) (4) (II). The site does not have any engines that operate for those purposes.

If you have any further questions about our site applicability to Section h, please contact me at 805-485-8871 X 2408 or email at [stines.cg@pg.com](mailto:stines.cg@pg.com)

Respectfully,

A handwritten signature in black ink that reads "Cindy Stines". The signature is fluid and cursive.


Cindy Stines  
Site Environmental Systems Leader  
Environmental Systems Leader

Enclosures: (4) RICE/NESHAP ZZZZ Section h Annual Reports

**RICE/NESHAP ZZZZ Sec h ANNUAL REPORT FORM**  
 Reporting Period: January 1, 2021 through December 31, 2021  
 Report Due Date: March 31, 2022

You are required to comply with the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE NESHAP). This includes requirements to comply with 40 CFR Part 63, Subpart ZZZZ, Section 63.6650(h): Stationary Reciprocating Internal Combustion Engines.  
**Please Note:** Your APCD Permit to Operate requires the holder to furnish the information required by the RICE NESHAP regulation upon request. Failure to do so may result in enforcement action (including monetary penalties) or suspension of the APCD Permit to Operate.

Permit No: 00015

<b>Facility name and address where the engine is located</b>				<b>Reporting Period</b>	
Name:	Proctor & Gamble Paper Products			Start Date:	1-8-2021
Address:	800 North Rice Avenue			End Date:	12-31-2021
City:	Oxnard			Report Date:	2-7-2022
<b>Engine Information</b>					
<b>Horsepower</b>	<b>Engine Model Number</b>		<b>Engine Serial Number</b>		<b>Model Year</b>
420	3406BDL		6TB10913		
<b>Engine Location</b>		<b>Latitude</b>		<b>Longitude</b>	
<b>Date-Time-Hours of Engine Operation</b>				<b>Entity Requesting Engine Operation and Reason</b>	
<b>Date</b>	<b>Start Time</b>	<b>End Time</b>	<b>#Hours</b>	<b>Entity</b>	<b>Reason</b>
1-8-21	12:00 pm	12:30 pm	835.1		Weekly Inspection
12-30-21	10:45 AM	11:15 AM	861.00		Annual Inspection
Please attach additional pages, if necessary:					
Number of hours the engine is contractually obligated to operate per year:					
Were there any deviations from the fuel requirements during the reporting period?				Yes	<input type="checkbox"/>
				No	<input checked="" type="checkbox"/>
If yes, report the number, duration, cause of deviations and the corrective action taken. Please attach additional pages, if necessary.					
Signature of person supplying the information: "I certify that the above information is correct."					
Signature:				Date:	2/11/2022
Print Name:	Marvella Berry			Phone #:	805-983-8924
Title:	Plant Manager			Email:	berry.m@pg.com
Submit electronic report to: Compliance and Emissions Data Reporting Interface (CEDRI) at <a href="http://www.epa.gov/cdx">www.epa.gov/cdx</a>					
Send this written report to:				For questions contact:	
Ms. Michelle Wood <a href="mailto:michelle@vcapcd.org">michelle@vcapcd.org</a> Ventura County Air Pollution Control District 4567 Telephone Road, Second Floor Ventura, CA 93003				Michelle: (805) 303-3703 <a href="mailto:michelle@vcapcd.org">michelle@vcapcd.org</a>  Fax: (805) 456-7707	

**RICE/NESHAP ZZZZ Section h ANNUAL REPORT FORM**  
**Reporting Period: January 1, 2021 through December 31, 2021**  
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**Please Note:** Your APCD Permit to Operate requires the holder to furnish the information required by the RICE NESHAP regulation upon request. Failure to do so may result in enforcement action (including monetary penalties) or suspension of the APCD Permit to Operate.

**Permit No: 00015**

Facility name and address where the engine is located				Reporting Period			
Name:	Proctor & Gamble Paper Products			Start Date:	1-8-2021		
Address:	800 North Rice Avenue			End Date:	12-31-2021		
City:	Oxnard			Report Date:	2-7-2022		
Engine Information							
Horsepower	Engine Model Number		Engine Serial Number		Model Year		
420	3406BDL		6TB10913				
Engine Location		Latitude			Longitude		
Date-Time-Hours of Engine Operation				Entity Requesting Engine Operation and Reason			
Date	Start Time	End Time	#Hours	Entity	Reason		
1-8-21	2:30 AM	3:00 PM	436.3		Weekly Inspection		
12-30-21	10:10 AM	10:40 AM	462.5		Annual Inspection		
Please attach additional pages, if necessary:							
Number of hours the engine is contractually obligated to operate per year:							
Were there any deviations from the fuel requirements during the reporting period?				Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
If yes, report the number, duration, cause of deviations and the corrective action taken. Please attach additional pages, if necessary.							
Signature of person supplying the information: "I certify that the above information is correct."							
Signature: <i>Marvella Berry</i>			Date: 2/11/2022				
Print Name: <i>Marvella Berry</i>			Phone #: 805-983-8924				
Title: <i>Plant Manager</i>			Email: <i>berry.m@pg.com</i>				
Submit electronic report to: Compliance and Emissions Data Reporting Interface (CEDRI) at <a href="http://www.epa.gov/cdx">www.epa.gov/cdx</a>							
Send this written report to:			For questions contact:				
Ms. Michelle Wood <a href="mailto:michelle@vcapcd.org">michelle@vcapcd.org</a> Ventura County Air Pollution Control District 4567 Telephone Road, Second Floor Ventura, CA 93003			Michelle: (805) 303-3703 <a href="mailto:michelle@vcapcd.org">michelle@vcapcd.org</a> Fax: (805) 456-7707				



**RICE/NESHAP ZZZZ Sec h ANNUAL REPORT FORM**  
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**Permit No: 00015**

Facility name and address where the engine is located		Reporting Period	
Name:	Proctor & Gamble Paper Products	Start Date:	1-8-2021
Address:	800 North Rice Avenue	End Date:	12-31-2021
City:	Oxnard	Report Date:	2-7-2022

Engine Information			
Horsepower	Engine Model Number	Engine Serial Number	Model Year
210	JU6HUF50	PE6068T185639	2002

Engine Location	Latitude	Longitude

Date-Time-Hours of Engine Operation				Entity Requesting Engine Operation and Reason	
Date	Start Time	End Time	#Hours	Entity	Reason
1-8-21	2:00pm	2:30pm	437.7		Weekly Inspection
7-1-21	2:40pm	3:10pm	450.8		Weekly Inspection


Please attach additional pages, if necessary:

Number of hours the engine is contractually obligated to operate per year:

Were there any deviations from the fuel requirements during the reporting period? Yes  No

If yes, report the number, duration, cause of deviations and the corrective action taken. Please attach additional pages, if necessary.

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

Signature: *Marvelle Berry*  Date: 2/11/2022  
 Print Name: *Marvelle Berry* Phone #: 805-983-8924  
 Title: *Plant Manager* Email: *berry.m@pg.com*

Submit electronic report to: Compliance and Emissions Data Reporting Interface (CEDRI) at [www.epa.gov/cdx](http://www.epa.gov/cdx)

Send this written report to:	For questions contact:
Ms. Michelle Wood <a href="mailto:michelle@vcapcd.org">michelle@vcapcd.org</a> Ventura County Air Pollution Control District 4567 Telephone Road, Second Floor Ventura, CA 93003	Michelle: (805) 303-3703 <a href="mailto:michelle@vcapcd.org">michelle@vcapcd.org</a> Fax: (805) 456-7707

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Permit No: 00015

Facility name and address where the engine is located		Reporting Period	
Name:	Proctor & Gamble Paper Products	Start Date:	1-8-2021
Address:	800 North Rice Avenue	End Date:	7-1-2021
City:	Oxnard	Report Date:	2-7-2022

Engine Information			
Horsepower	Engine Model Number	Engine Serial Number	Model Year
210	JW6H4F50	PE6068T157094	2001

Engine Location	Latitude	Longitude

Date-Time-Hours of Engine Operation				Entity Requesting Engine Operation and Reason	
Date	Start Time	End Time	#Hours	Entity	Reason
1-8-21	2:00 pm	2:30 pm	437.7		Weekly Inspection
7-1-21	2:40 pm	3:10 pm	450.8		Weekly Inspection

Please attach additional pages, if necessary:

Number of hours the engine is contractually obligated to operate per year: \_\_\_\_\_

Were there any deviations from the fuel requirements during the reporting period? Yes  No

If yes, report the number, duration, cause of deviations and the corrective action taken.  
 Please attach additional pages, if necessary.

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

Signature: <i>Marvelle Berry</i>	Date: 2/11/2022
Print Name: <i>Marvelle Berry</i>	Phone #: 805-983-8924
Title: <i>Plant Manager</i>	Email: <i>berry.m@pg.com</i>

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OND quarter

Opacity Annual Formal Survey  
Procter & Gamble Onond Plant

NYCAPCD Part 70 Permit, Attachment 50 Compliance Document

Conducted On Date: 10/28/21 Time: 7:30 AM  
 Conducted By: Ric Jenkins / Almeida Signature: [Signature]

Visible Emissions Certification  
 Most Recent Certification Date: 7/21, 10/6

Limit Emission Points  
 Drawing - PG-3419820

Stack	Stack Hght (ft)	Stack Dia (sq ft)	Emissions Unit	Emission Description	Stack Position	Visible Emissions other than Uncombined Water N - if there are no visible emissions for 3 minutes Y - if there are visible emissions > 20% or No. 1 Ringelmann for 3 minutes
S-1	52	2.10	Washer Wet Lapper	PM	When Fan motor on	N
S-2	84	12.67	Cogen 2/LM5000 Turbine	Thermal Output with NOx, CO, SOx, PM, ROC, NH3	Damper closed when ZX is running	Y
S-3	27	4.40	B-301 Steam Boiler	Thermal Output with NOx, CO, SOx, PM, ROC	FGR closed during SU (shr) only - 100% Exhaust - otherwise partial exhaust	N
Stack S-4 is not a physical stack but represents the totals stacks from 1X process stacks 4A-4E						
S-4A	55	4.72	1X PreDryer	Thermal Output with NOx, CO, SOx, PM, ROC HAF + Burners OR Cogen + Burners	Open when 1X running	Y
S-4B	-	-	Furnace Cooling	Hot Air Release from shell cooling	Open	N
S-4C	-	-	HRB	Thermal Output, NOx, CO, SOx, PM, ROC	Normally Closed	Y
S-4D	50	9.63	Cogen 1/LM2500 Turbine	Thermal Output, NOx, CO, SOx, PM, ROC	Damper closed when 1X running	Y
S-4E	-	-	W/WL Broke Pulper vent	PM	Open vent	Y
S-5	-	-	1X Scrubber	PM	When Fan motor on	Y
S-6	-	-	ZX Scrubber	PM	When Fan motor on	Y
Stack S-7 is not physical stack but represents the totals stacks from ZX NOTE - PreDryer Exhaust is the emission from the YHAF (after drying)						
S-7A	74	12.22	ZX PreDryer Exhaust (YHAF Stack)	Thermal Output with NOx, CO, SOx, PM, ROC, NH3 LM5000 + HAF + PD	Normally Open	Y
S-7B	-	-	Exhaust Divertion (PDF Stack)	Thermal Output with NOx, CO, SOx, PM, ROC, NH3	Normally Closed	N
S-7C	-	-	ZX Vacuum Stack	PM	Open Vent	N
S-7D	-	-	Zx Wet End (Former)	PM	Open Vent	N
S-7E	-	-	ZX Broke Pulper Vent	PM	Open Vent	N
2			Fire Pump #2	CARB Fuel Combustion	Open vent	N
3			Fire Pump #3	CARB Fuel Combustion	Open vent	N
4			Fire Pump #4	CARB Fuel Combustion	Open vent	N
5			Fire Pump #5	CARB Fuel Combustion	Open vent	N

Any Other Visible Emissions? No

Annual Title V Permitted Equipment Audit

Name: Pat J. Sullivan

Date: 10/28/21

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

Annual Title V Permitted Equipment Audit

Name: Bob Johnson

Date: 10/28/21

	Equipment	Location	Any Signs of Alteration?	Visible Nameplate Data	Comments
9	1X Scrubber Stack	Top of roof - S-5	N	NOT there	
10	2X Scrubber Stack	Top of roof - S-1	N	Y	
	2X - Dryer Exhaust Stack	Stack S-7A (square stack)			
11			N	Y	
	2X - Vacuum Exhaust Stack	Stack S-7C at top of Vacuum Train			
12			N	Y	
	2X - Wet End Exhaust Stack <i>also known as Former Exhaust Stack</i>	Stack S-7D			
13			N	Y	
	W/WL Broke Pulper Vent	Stack S-4E (Safety watch - do not cross red faded line)			
14			N	Y	
	1X - Wet End Exhaust Stack	Stack S-4D near Cooling Tower			
15			N	Y	
	1X - PreDryer Exhaust Stack (Big)	Stack S-4A			
16			N	Y	
	1X - PreDryer Exhaust Stack (little)	Stack S-4B			
17			N	Y	

Annual Title V Permitted Equipment Audit

Name:

*Chi Jenovic*

Date:

*10/28/21*

Equipment	Location	Any Signs of Alteration?	Visible Nameplate Data	Comments
Ground Level by 90 day HW storage				
20 1X - Dry End Venturi Scrubber, Anderson 2000 Series, Model No. WAF170	North Wall of Papermachine room building facing 90-Day Accumulation Area. Stack S-5	N	Y	
21 2X Dry End Venturi Scrubber Anderson 2000 Series Model No. WAF113	Stack S-1	N	Y	
22 KRT/TT Converting Line Room	Ensure that all roof vents are closed.	N	Y	
23 Additive and Ink Applications	PVA Glue Room, KX1/2/3, Ink Room	N	NOT IN USE	
24 Cold Cleaners w/ < 1 m <sup>2</sup> surface Area	Papermaking Rebuild Shop, Converting Shop, Logistics Shop	N	Y	
25 Emergency Engines	#4&5 - South Property Line in Shed next to Tank @ Outside warehouse <i>213 PG Fire Pumps</i>	N	Y	
26 X - Vacuum Exhaust Stack	Stack S-4C			

Annual Title V Permitted Equipment Audit

Name: Eric J. [Signature]

Date: 10/28/21

Equipment	Location	Any Signs of Alteration?	Visible Nameplate Data	Comments
18 Outside by Stock Prep	N	Y		
19 W/WL Venturi Scrubber, Anderson 200 Series, Model No. VES-113 Cyclonic	N	hard to read		

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

8301	
Fuel Usage (MMSCF)	
Jan-21	0.36
Feb-21	9.28
Mar-21	0.45
Apr-21	0.01
May-21	0.96
Jun-21	0.00
Jul-21	1.09
Aug-21	0.01
Sep-21	0.02
Oct-21	0.00
Nov-21	5.03
Dec-21	6.52
<b>12 Month Total</b>	<b>23.75</b>

Annual Heat Input (AHI):

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

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

AHI = 23.7468 \* 1050

AHI = 24,934 MMBTU

Maximum Potential Heat Input (MPHI)

Rated Firing Capacity (RFC): 100 MMBTU/hr  
Maximum Potential Operating Hours (MPOH): 8,760 hrs

MPHI = RFC \* MPOH

MPHI = 876,000 MMBTU

30% of MPHI (Maximum Allowable): 262,800 MMBTU

Maximum Allowable Rolling 12 month Fuel Usage: 250.29 MMSCF

Capacity Factor (CF)

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

CF = AHI / MPHI

CF = 0.02846 Ratio

% CF = 2.8% (%CF)



**PO00015PC1.1 RY 2021 Monthly Throughput**

Month	PMKG	CVTG	Total Facility	Combustion Emissions					
	ROC (tons)	ROC (tons)	ROC (tons)	ROC (tons)	NOx (tons)	PM (tons)	SOx (tons)	CO (tons)	NH3 (tons)
Jan-21	0.89	0.27	2.39	1.22	9.32	1.52	0.14	13.09	0.48
Feb-21	5.59	0.29	7.04	1.16	8.98	1.46	0.13	12.63	0.47
Mar-21	0.95	0.17	2.38	1.25	9.35	1.56	0.15	13.28	0.31
Apr-21	5.94	0.11	7.22	1.16	8.42	1.42	0.14	12.73	0.28
May-21	0.67	0.14	2.07	1.27	9.17	1.57	0.15	15.73	0.32
Jun-21	0.73	0.09	2.01	1.20	8.94	1.47	0.15	16.98	0.32
Jul-21	6.16	0.12	7.52	1.24	10.07	1.53	0.15	18.76	0.36
Aug-21	0.62	0.11	1.92	1.19	8.66	1.47	0.15	18.38	0.38
Sep-21	0.28	0.11	1.40	1.00	7.28	1.23	0.13	15.61	0.36
Oct-21	5.62	0.13	6.92	1.17	8.56	1.45	0.15	19.99	0.37
Nov-21	0.37	0.12	1.56	1.06	8.33	1.31	0.14	15.18	0.42
Dec-21	5.98	0.13	7.28	1.16	8.88	1.43	0.14	16.95	0.39
<i>Current Actual in Tons versus Permit Limit</i>									
12 Mo Tons	<b>33.80</b>	<b>1.80</b>	<b>49.70</b>	<b>14.10</b>	<b>105.95</b>	<b>17.42</b>	<b>1.73</b>	<b>189.30</b>	<b>4.46</b>
	ROC			NOx	PM	SOx	CO	NH3	
	<b>16.82</b>			<b>132.88</b>	<b>68.3</b>	<b>2.03</b>	<b>284.93</b>	<b>54.19</b>	

Permit Requirement:  
 Section No. 7.  
 Attachment  
 000015PC2-rev411,  
 1,441. Page: 1.  
 Condition 1.

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Limit ->	Emission Limits - Tons/Rolling 12-Month					
	ROC 16.82	NOx 132.88	PM 21.25	SOx 2.03	CO 284.93	Ammonia
Jan 21	14.04	105.34	1.44	1.73	193.38	4.37
Feb 21	13.90	104.23	1.27	1.72	197.05	4.49
Mar 21	13.77	103.61	1.38	1.71	201.34	4.58
Apr 21	13.74	103.78	1.39	1.70	204.53	4.69
May 21	13.58	103.12	1.36	1.69	206.54	4.78
Jun 21	13.49	116.27	1.36	1.67	207.09	4.84
Jul 21	13.38	115.81	1.40	1.66	208.28	4.87
Aug 21	13.33	115.57	1.41	1.66	210.46	4.88
Sep 21	13.45	116.58	1.38	1.67	215.65	4.87
Oct 21	13.43	116.71	1.43	1.66	218.65	4.89
Nov 21	13.35	115.81	1.23	1.65	305.07	5.02
Dec 21	13.36	115.91	1.45	1.65	316.17	5.02



Ventura County  
Air Pollution  
Control District

**RESPONSIBLE OFFICIAL'S  
CERTIFICATION FORM**

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


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

Ed Swede  
Air Quality Engineer  
Ventura County Air Pollution Control District  
4567 Telephone Road, Second Floor  
Ventura, CA 93003

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VENTURA COUNTY  
A.P.C.D.  
2022 FEB 14 PM 3:24

**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 of Responsible Official:  <small>Please use the Adobe Fill &amp; Sign option to sign (click the 'Sign Here' flag to link to additional instructions)</small>	Date: 2/11/2022
Title of Responsible Official: Plant Manager	
Facility ID: 00015	



February 10, 2022

Mr. Ed Swede  
Air Quality Engineer  
Ventura County APCD  
4567 Telephone Road, Second Floor  
Ventura, California 93003

Subject: Semi Annual Report - Permit to Operate No. 0015  
Excursion Report for 1X, and 2X Paper Machine Dry End Scrubbers  
Report Period: 7/1/21 – 12/31/21

Mr. Swede,

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

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

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

Respectfully,

Cindy Stines  
Site Environmental System Leader

Cc:

Mr. Marvelle Berry, Plant Manager; P&G  
Mr. Mario Aguilar, HS&E Leader; P&G  
Mr. Armando Santana, SEL; P&G  
Ms. Chris Cote, AQS; VCAPCD

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Semi-Annual Scrubber Report  
Permit to Operate No. 00015  
Excursion Report for 1X and 2X Paper  
Machines  
and Dry End Scrubbers  
Report Period 7/1/2021 to 12/31/2021

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

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

Report Period:	July 1, 2021 – December 31, 2021
Subject Units:	2 Dry End Scrubbers: 1X Paper Machine and 2X Paper Machine

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

Excursion Details –

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

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

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**Semi-Annual Report**  
**Permit to Operate No. 00015**  
**Actual Operating Hours for**  
**LM2500 and LM6000 Turbines**  
**Report Period**  
**1/1/2021 – 12/31/2021**



Ventura County  
Air Pollution  
Control District

**RESPONSIBLE OFFICIAL'S  
CERTIFICATION FORM**

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


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

Ed Swede  
Air Quality Engineer  
Ventura County Air Pollution Control District  
4567 Telephone Road, Second Floor  
Ventura, CA 93003

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 A.P.C.D.  
 2022 FEB 14 PM 3:24

**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 of Responsible Official:  <small>Please use the Adobe Fill &amp; Sign option to sign (click the 'Sign Here' flag to link to additional instructions)</small>	Date: 2/11/2022
Title of Responsible Official: <i>Plant Manager</i>	
Facility ID: 00015	





February 10, 2022

Ed Swede  
Air Quality Engineer  
Ventura County APCD  
4567 Telephone Road, Second Floor  
Ventura, California 93003

Subject: Semi Annual Report - Permit to Operate No. 0015  
Actual Annual Operating Hours for LM2500 and LM6000 Turbines  
Report Period: 1/1/21- 12/31/21

Mr. Swede:

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

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

Additionally, per Section 10, District General Part 70 Permit Conditions, Condition 14, a Responsible Official Certification is attached to these reports.

I can be reached at 805-485-8871 x2408 or stines.cg@pg.com should you have any questions about this certification.

Respectfully,

Cindy Stines  
Site Environmental Systems Leader

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

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

SUMMARY REPORT  
ANNUAL OPERATING HOURS AND SOURCE TEST RESULTS

Reporting Period Dates: From 1/1/21 through 12/31/21

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

Certification or Audit: May 20, 2021 (Annual Source Test)  
Process Unit Description: LM-2500 Gas Turbine (Cogen I)

Total Source Operating  
Time in Reporting Period: 8466.38

SOURCE TEST SUMMARY

Pollutant	Measured Emissions	Permit Limit
Oxides of Nitrogen, ppm @15% O <sub>2</sub>	18.9	24
Carbon Monoxide, lb/hr	52.9	180.13

Refer to Horizon Test report # P27\_077\_FR\_COMP\_C1\_FINAL.pdf for additional details.

**REPORT #2 – LM-6000**  
Operating Hours and Source Test Results

**SUMMARY REPORT**  
**ANNUAL OPERATING HOURS AND SOURCE TEST RESULTS**

Reporting Period Dates: From 1/1/21 through 12/31/21

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

Certification or Audit: March 3, 2021 (Annual Source Test)  
Process Unit Description: LM-6000 Gas Turbine (Cogen II)

Total Source Operating  
Time in Reporting Period: 8462.05

**SOURCE TEST SUMMARY**

Pollutant	Measured Emissions	Permit Limit
Oxides of Nitrogen, ppm @15% O <sub>2</sub>	2.21	2.5
Carbon Monoxide, lb/hour	4.68	10.20
Reactive Organic Compounds, ppm @15%	<.40	2.0
Ammonia, ppm @ 15% O <sub>2</sub>	4.68	20

Please refer to Horizon Test report # P27-077-FR COMP Table 2-1 Summary of results for additional details.