associates environmental

Title V Annual Compliance Certification
(April 1, 2021 to March 31, 2022)

Part 70 Permit No. 00157

Prepared For:
New-Indy Oxnard, LLC
P.O. Box 519
Port Hueneme, CA 93044

Equipment Location:

5936 Perkins Road
Oxnard, CA 93033

Prepared by:

Associates Environmental
18141 Beach Boulevard, Suite 200
Huntington Beach, CA 92648

Project No: 260-103

NEW INDY
CONTAINERBOARD

May 9, 2022

Mr. Keith Macias
Compliance Manager
Ventura County APCD
4567 Telephone Road, 2nd Floor
Ventura, CA 93003

Re: New-Indy Oxnard, LLC
2021-2022 Annual Title V Certification (PTO 0157)

Dear Mr. Macias:

Enclosed, please find 2021-2022 Annual Title V Certification Forms and related documentation for New-Indy Oxnard facility.

If you have any questions, please contact me at (805) 271-7284.

Sincerely,

Robyn Lebrilla
Technical and Environmental Manager

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

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

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(Part 70 Permit Number 00157)

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Section 1

Annual Compliance Certification Signature Form

Ventura County
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ANNUAL COMPLIANCE CERTIFICATION
SIGNATURE COVER FORM

TV Permit # 00157

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

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

Confidentiality

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

Certification by Responsible Official

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

Signature and Title of Responsible Official:	Date:
Title: Mill Manager	5/6/2022

Time Period Covered by Compliance Certification

04 / 01 / 21 (MM/DD/YY) to 03 / 31 / 22 (MM/DD/YY)

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Section 2

Annual Compliance Certification Deviation Summary Form

Ventura County
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ANNUAL COMPLIANCE CERTIFICATION
DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 04 / 01 / 21 (MM/DD/YY) to 03 / 31 / 22 (MM/DD/YY)

A. Attachment # or Permit Condition #:	B. Equipment description:	C. Deviation Period: Date & Time
PO0157PC2 Condition No. 3	Nebraska Boiler	Begin: 10/7/2021, 7:51 am End: 10/8/2021, 9:07 am When Discovered: Date & Time 10/8/2021, 8:30 am
D. Parameters monitored:	**E. Limit:**	**F. Actual:**
FGR Variable Frequency Drive Percentage & speed (Hz)	As established in 2018 tune-up report: VFD at 68% and speed at 47.2 Hz @ 90% load.	VFD: greater than 68% up to 73% Speed: greater than 47.2 Hz up to 50 Hz
G. Probable Cause of Deviation:	**H. Corrective actions taken:**	
Boiler fuel valve malfunctioned.	Boiler fuel valve was replaced and calibrated.	

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:**	

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Section 3

Annual Compliance Certification Source Test Summary Form

Ventura County
Air Pollution
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ANNUAL COMPLIANCE CERTIFICATION

SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 04 / 01 / 21 (MM/DD/YY) to 03 / 31 / 22 (MM/DD/YY)

A. Emission Unit Description:			B. Pollutant:
Gas Turbine Cogen Unit			NOx
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test or Monitoring Record Citation:	F. Test Date:
10.0 ppm @ 15% O2	12 ppm @ 15% O2	Airx Source Test	3/9/2022

A. Emission Unit Description:			B. Pollutant:
Gas Turbine Cogen Unit			CO
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test or Monitoring Record Citation:	F. Test Date:
17.55 lbs/hr	59.65 lbs/hr	Airx Source Test	3/9/2022

A. Emission Unit Description:			B. Pollutant:
Gas Turbine Cogen Unit			NH3
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test or Monitoring Record Citation:	F. Test Date:
11.8 ppm @ 15% O2	20 ppm @ 15% O2	Airx Source Test	3/9/2022

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

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

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Section 4

Annual Compliance Certification Permit Attachment Form

Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 21 (MM/DD/YY) to 03 / 31 / 22 (MM/DD/YY)

A. Attachment # or Permit Condition #: 74.15N1-00157	D. Frequency of monitoring: Once every 24 months
B. Description: Boiler shall meet NOx and CO concentration limits.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: ARB Method 100
C. Method of monitoring: Source test - Conducted in 2020, next one scheduled in 2022. Copy of reports maintained.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 103N5-0157	D. Frequency of monitoring: Continuous and monthly
B. Description: Nebraska boiler stack monitoring.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: NA
C. Method of monitoring: Monthly records of fuel consumption, annual calculation of capacity factor. At the end of the compliance year annual capacity factor was calculated at 0.60%. NOx being monitored by CEMS.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: STRMLN157-NOx, CO, NH3	D. Frequency of monitoring: Continuous and annual
B. Description: Gas Turbine/Cogeneration Unit meet NOx, CO and ammonia (NH3) requirements.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: EPA Method 20, ARB Method 100
C. Method of monitoring: Annual source test and CEMS. District notified 15 days in advance and test submitted within 45 days. CEMS properly maintained and operated. No emission violations occurred. Monthly fuel consumption tracked and provided.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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Period Covered by Compliance Certification: 04 / 01 / 21 (MM/DD/YY) to 03 / 31 / 22 (MM/DD/YY)

A. Attachment # or Permit Condition #: STRMLN157-SOx	D. Frequency of monitoring: Continuous
B. Description: Gas Turbine/Cogeneration Unit meet SOx requirement.	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: NA
C. Method of monitoring: Equipment is fired on PUC quality natural gas therefore meeting the monitoring requirements.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 74.9N7	D. Frequency of monitoring: When operated (and annual)
B. Description: Stationary IC Engine rated at greater than 50 hp - Exemption for Emergency IC Engine	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: NA
C. Method of monitoring: Non-resettable hour meter and document reason for operation.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 40CFR63ZZZZN9	D. Frequency of monitoring: Annually
B. Description: Reciprocating Internal Combustion Engine (RICE) - Existing Emergency Spark-Iginited (Natural Gas) Engine	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: NA
C. Method of monitoring: Non-resettable hour meter and maintenance activities.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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Period Covered by Compliance Certification: 04 / 01 / 21 (MM/DD/YY) to 03 / 31 / 22 (MM/DD/YY)

A. Attachment # or Permit Condition #: PO00157PC1 - Cond 1	D. Frequency of monitoring: monthly
B. Description: General Recordkeeping Requirements	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: NA
C. Method of monitoring: Monthly records	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: PO00157PC1 - Cond 2, 3	D. Frequency of monitoring: monthly
B. Description: Stationary Gas Turbine Gas Path Cleaning Solvent Use	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: NA
C. Method of monitoring: Monthly records of solvent usage and purchase records, SDS for ROC content	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: PO00157PC1 - Cond 4	D. Frequency of monitoring: continuous
B. Description: Exempt Solvents	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: NA
C. Method of monitoring: Maintain list of exempt solvents (Update as needed)	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

Ventura County
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Period Covered by Compliance Certification: 04 / 01 / 21 (MM/DD/YY) to 03 / 31 / 22 (MM/DD/YY)

A. Attachment # or Permit Condition #: PO00157PC2 - Cond. 1	D. Frequency of monitoring: Continuous
B. Description: Gas Turbine, Duct Burner, Nebraska Boiler Annual Emission Limits	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: NA
C. Method of monitoring: CEMS, Fuel records	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: PO00157PC2 - Cond. 2	D. Frequency of monitoring: Continuous
B. Description: Gas Turbine, COEN Duct Burner, Maxon Duct Burner and Nebraska Boiler Natural Gas Requirement	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: NA
C. Method of monitoring: Equipment fired on PUC quality natural gas.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: PO00157PC2 - Cond. 3	D. Frequency of monitoring: Continuous
B. Description: Nebraska Boiler Flue Gas Recirculation (FGR) Requirement	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: NA
C. Method of monitoring: Record FGR variable frequency drive (VFD) percentage and speed (Hz).	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): I H. *Excursions, exceedances, or other non-compliance? (Y or N): Y *If yes, attach Deviation Summary Form

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Period Covered by Compliance Certification: 04 / 01 / 21 (MM/DD/YY) to 03 / 31 / 22 (MM/DD/YY)

A. Attachment # or Permit Condition #: PO00157PC2 Cond. 4	D. Frequency of monitoring: Continuous
B. Description: Nebraska Boiler NOx and Oxygen Continuous Monitoring Requirements	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: NA
C. Method of monitoring: CEMS to monitor NOx and oxygen. No emission violation occurred. Daily zero and span drifts conducted when boiler is operated.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: PO00157PC2 Cond. 5	D. Frequency of monitoring: Continuous
B. Description: Recordkeeping for Maxon Duct Burner	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: NA
C. Method of monitoring: Continuously record time and duration of burner operation and fuel consumption rate.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: PO00157PC2 Cond. 6	D. Frequency of monitoring: Continuous
B. Description: Rating of Maxon Duct Burner	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: NA
C. Method of monitoring: Fuel meter for hourly fuel consumption rate	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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Period Covered by Compliance Certification: 04 / 01 / 21 (MM/DD/YY) to 03 / 31 / 22 (MM/DD/YY)

A. Attachment # or Permit Condition #: Rule 50	D. Frequency of monitoring: Quarterly
B. Description: Opacity	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: EPA Method 22
C. Method of monitoring: Formal survey verifying no visible emissions.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: Rule 54.B.1	D. Frequency of monitoring: NA
B. Description: Sulfur Compounds - SOx at Point of Discharge	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: NA
C. Method of monitoring: Facility uses PUC quality natural gas, therefore it is exempt from the monitoring requirements.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: Rule 54.B.2	D. Frequency of monitoring: NA
B. Description: Sulfur Compounds - SOx at or Beyond Property Line	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: NA
C. Method of monitoring: Compliance achieved through use of PUC quality natural gas and memo from Terri Thomas dated May 23, 1996.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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Period Covered by Compliance Certification: 04 / 01 / 21 (MM/DD/YY) to 03 / 31 / 22 (MM/DD/YY)

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

A. Attachment # or Permit Condition #: Rule 57.1	D. Frequency of monitoring: NA
B. Description: Particulate Matter Emissions from Fuel Burning Equipment	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: NA
C. Method of monitoring: Compliance achieved through Rule 57.B District analysis, dated December 3, 1997.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: Rule 64.B.1	D. Frequency of monitoring: NA
B. Description: Sulfur Content of Fuels - Gaseous Fuel Requirements	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: NA
C. Method of monitoring: Equipment is fired on PUC quality natural gas, therefore it is exempt from the monitoring requirements.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

Ventura County
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A. Attachment # or Permit Condition #: Rule 64.B.2	D. Frequency of monitoring: Continuous
B. Description: Sulfur Content of Fuels - Liquid Fuel Requirements	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: NA
C. Method of monitoring: ARB quality reformulated gasoline and ARB certified diesel fuel combusted.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: Rule 68	D. Frequency of monitoring: NA
B. Description: Carbon Monoxide Emissions	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: NA
C. Method of monitoring: Equipment is exempt from the requirements of this rule.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: Rule 74.6	D. Frequency of monitoring: Annually
B. Description: Surface Cleaning and Degreasing	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: NA
C. Method of monitoring: Facility utilizes non-organic or clean air solvent so exempt from the rule. Facility maintains records of current solvent information.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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Period Covered by Compliance Certification: 04 / 01 / 21 (MM/DD/YY) to 03 / 31 / 22 (MM/DD/YY)

A. Attachment # or Permit Condition #: Rule 74.11.1	D. Frequency of monitoring: Annual
B. Description: Large Water Heaters and Small Boilers	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: NA
C. Method of monitoring: Unit subject to Rule 74.11.1 meets requirements of Rule. Annual survey maintained.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: Rule 74.22	D. Frequency of monitoring: Annual
B. Description: Natural Gas-Fired Fan-Type Central Furnaces	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: NA
C. Method of monitoring: No units subject to Rule 74.22. Annual survey maintained.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: Rule 74.1	D. Frequency of monitoring: When used
B. Description: Abrasive Blasting	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: NA
C. Method of monitoring: Document abrasive blasting operation and visible inspections. Records include date, type of blasting media and, location of where blasted and item blasted.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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Period Covered by Compliance Certification: 04 / 01 / 21 (MM/DD/YY) to 03 / 31 / 22 (MM/DD/YY)

A. Attachment # or Permit Condition #: Rule 74.2	D. Frequency of monitoring: When used
B. Description: Architectural Coatings	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: NA
C. Method of monitoring: C.D. Lyon Inc., a contractor, applied architectural coatings at the facility (VCAPCD Permit #: 07141-T01).	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 40CFR61M	D. Frequency of monitoring: NA
B. Description: NESHAPS Asbestos	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: NA
C. Method of monitoring: No asbestos related activities during compliance period.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: Part 70 General	D. Frequency of monitoring: Continuous
B. Description: General Part 70 Permit Permit Conditions	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: NA
C. Method of monitoring: Records, monitoring data maintained for five years, renewal application, annual compliance certifications submitted by due dates.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

Ventura County
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Period Covered by Compliance Certification: 04 / 01 / 21 (MM/DD/YY) to 03 / 31 / 22 (MM/DD/YY)

A. Attachment # or Permit Condition #: PO General	D. Frequency of monitoring: NA
B. Description: General Permit to Operate Conditions	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: NA
C. Method of monitoring: Permit posted.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: 40CFR68 RMP-0157	D. Frequency of monitoring: As needed
B. Description: Accidental Release Prevention and Risk Management Plan	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: NA
C. Method of monitoring: The facility is exempt from Part 68 based on quantity stored.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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

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Period Covered by Compliance Certification: 04 / 01 / 21 (MM/DD/YY) to 03 / 31 / 22 (MM/DD/YY)

A. Attachment # or Permit Condition #: SHIELD-D, Da, Db, Dc	D. Frequency of monitoring: NA
B. Description: Permit Shield for 40CFR60. Subparts D, Da, Db and Dc	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: NA
C. Method of monitoring: Equipment is exempt from Subpart D and Da. Equipment is not new, modified or reconstructed that would trigger the requirements of Subpart Db and Dc. Therefore, permit shield remains in effect.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: SHIELD-60JJJJ	D. Frequency of monitoring: NA
B. Description: Permit Shield for 40 CFR60 Subpart JJJJ	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: NA
C. Method of monitoring: Equipment is not new, modified or reconstructed that would trigger the requirements of Subpart JJJJ. Therefore permit shield remains in effect.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: SHIELD-60KKKK	D. Frequency of monitoring: NA
B. Description: Permit Shield for 40 CFR60 Subpart KKKK	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: NA
C. Method of monitoring: Equipment is not new, modified or reconstructed that would trigger the requirements of Subpart KKKK. Therefore permit shield remains in effect.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

Ventura County Air Pollution Control District

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PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 04 / 01 / 21 (MM/DD/YY) to 03 / 31 / 22 (MM/DD/YY)

A. Attachment # or Permit Condition #: SHIELD-63YYYY	D. Frequency of monitoring: NA
B. Description: Permit Shield for 40CFR63 Subpart YYYY	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: NA
C. Method of monitoring: Facility emissions of HAPs remain less than the major source threshold. Therefore, Subpart is not applicable.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: SHIELD-63JJJJJJ	D. Frequency of monitoring: NA
B. Description: Permit Shield for 40 CFR63 Subpart JJJJJJ	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: NA
C. Method of monitoring: The boiler is fired on PUC quality natural gas. Therefore, it is exempt from this Subpart.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

A. Attachment # or Permit Condition #: SHIELD-40 CFR72-78	D. Frequency of monitoring: Annual
B. Description: Permit Shield for 40 CFR Parts 72 through 78	E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable: NA
C. Method of monitoring: Monitor electrical output to utility for sale. Facility supplied less than 219,000 MW-hr/yr to any utility power distribution system. Therefore, these subparts are not applicable.	F. Currently in Compliance? (Y or N): Y G. Compliance Status? (C or I): C H. *Excursions, exceedances, or other non-compliance? (Y or N): N *If yes, attach Deviation Summary Form

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Attachment A

Summary of Applicable Requirements (Attachments)

18141 Beach Boulevard, Suite 200 ▪ Huntington Beach, CA 92648 ▪ 949.352.4941 Office ▪ 714.362.9085 Fax

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Summary of Applicable Requirements (Attachments)
(Part 70 Permit Number 00157)

Attachment	Description
Part 70 Permit Section 1.c.	Tables 1.c.1, 1.c.2, 1.c.3 and 1.c.4 (enclosed)
Part 70 General	General Part 70 Permit Conditions
PO General	General Permit to Operate Conditions
40CFR68 RMP-0157	40 CFR Part 68 – Accidental Release Prevention & Risk Management Plans
40CFR82	40 CFR 82 – Protection of Stratospheric Ozone
Shield-D,Da,Db,Dc	40 CFR Part 60 Subparts D, Da, Db, and Dc
Shield-60JJJJ	40 CFR Part 60 Subpart JJJJ
Shield-60KKKK	40 CFR Part 60 Subpart KKKK
Shield-63YYYY	40 CFR Part 63 Subpart YYYY
Shield-63JJJJJJ	40 CFR Part 63 Subpart JJJJJJ
Shield-40CFR72-78	40 CFR Parts 72-78

1.c. PERIODIC MONITORING SUMMARY

This periodic monitoring summary is intended to aid the permittee in quickly identifying key monitoring, recordkeeping, and reporting requirements. It is not intended to be used as a "stand alone" monitoring guidance document that completely satisfies the requirements specifically applicable to this facility. The following tables are included in the periodic monitoring summary:

- Table 1.c.1 - Specific Applicable Requirements
- Table 1.c.2 - Permit-Specific Conditions
- Table 1.c.3 - General Applicable Requirements
- Table 1.c.4 - General Requirements for Short-Term Activities

1.c.1. Specific Applicable Requirements

The Specific Applicable Requirements Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 6 of this permit.

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
74.15N1-00157	Rules 74.15.B.1, 74.15.C.4, 74.15.E	•Source test every 24 months •Annual compliance certification	•Records of source test reports	None	None	
103N5-0157	Rules 103.A.2, A.4	•Monthly records of fuel consumption •Annual compliance certification with capacity factor calculation •CEM for NOx (Refer to Attachment PO0157PC2, Condition No. 4 for monitoring requirements to meet Rule 103.A.4)	•Monthly records of fuel consumption •Annual capacity factor calculation •Refer to Attachment PO0157PC2, Condition No. 4 for recordkeeping and reporting requirements to meet Rule 103.A.4	None	None	•The Nebraska boiler is exempt from Rule 103.A.2 only. Rule 103.A.4 still applies.

1.c.1. Specific Applicable Requirements (Continued)

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
STRMLN157-NO_x, CO, NH_3	Rules 26, 74.23.B.1, 74.23.B.2, 74.23.B.4, 103.A.4, 40 CFR Part 60 Subpart GG	•Annual Source Test (NOx, CO, O2, NH_3, fuel HHV) •Submit test results w/in 45 days of conducting tests •CEMs for fuel consumption, NOx, CO, O2, and control system operating parameters •Report each CEM emission violation w/in 96 hours •Monthly records of fuel consumption •Elapsed time of operation •Annual compliance certification	•Records of CEMs data •Records of maintenance operations, periodic inspections, and repairs to turbine, air pollution control system, and CEMs •Records of source test reports and any violations or limit exceedances •Monthly records of fuel consumption	•Actual annual operating hours or fuel consumption •Annual source test with control system operating parameters	•NO_x-EPA Method 20 •CO - ARB Method 100 •O2 - ARB Method 100 •NH_3 - BAAQMD Method ST-1B (1/20/82) •Gaseous fuel HHV - ASTM Method D1826-88 •Fuel oil HHV - ASTM Method 240-87	•Steamlined requirements
STRMLN157-SO_x	Rules 54 and 64, 40 CFR Part 60 Subpart GG,	•Annual compliance certification •None for PUC-quality gas, propane, or butane •Annual test if gas is other than PUC-quality gas, propane, or butane (submit with annual compliance certification) •Upon request, source test for sulfur compounds at point of discharge	•Annual fuel gas analysis for non PUC-quality gas	None	•Gaseous fuel: SCAQMD Method 307-94 or ASTM D1072-90(1994) •Exhaust Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A,16B, or SCAQMD Method 307-91, as appropriate	•Steamlined requirements •Natural Gas Only
74.9N7	Rule 74.9 Emergency Engine Exemption	•Monitor maintenance hours with elapsed hour meter	•As required by Rule 74.9.F.1	•Annual report of engine maintenance hours	None	
40CFR63ZZZZN9	RICE MACT for existing emergency spark ignited engines	•Maintenance Records •Annual compliance certification	•Maintenance records	None	None	

1.c.2. Permit-Specific Conditions

The Permit-Specific Conditions Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 7 of this permit.

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
PO0157PC1 Condition No. 1	Rule 26 General Recordkeeping	•Annual compliance certification •Monthly records of throughput and consumption	•Monthly records	None	None	
PO0157PC1 Condition No. 2,3	Rule 74.6 Stationary Gas Turbine Gas Path Cleaning	•Annual compliance certification •Maintain current solvent information •Upon request, solvent testing	•Records of current solvent information	None	•ROC content – EPA Method 24	
PO0157PC1 Condition No. 4	Rule 29 Exempt Solvents	•Maintain a list of solvents in use and their permit exemption status data	None	None	None	
PO0157PC2 Condition No. 1	Rule 26 Annual Emissions Limits for GE Turbine, Coen Duct Burner, and Nebraska Boiler	•Rolling twelve month calculations of emissions for combined units •Annual compliance certification	•Rolling twelve month records of emissions for combined units	None	None	
PO0157PC2 Condition No. 2	Rule 26 Natural Gas Only Requirement	•Annual compliance certification	None	None	None	
PO0157PC2 Condition No. 3	Rule 29 Flue Gas Recirculation at Nebraska Boiler	•Records of FGR VFD percentage and speed (Hz) during boiler tune-up and when boiler is operated •Annual compliance certification	•Records of FGR VFD percentage and speed (Hz) during boiler tune-up and when boiler is operated	None	None	

1.c.2. Permit-Specific Conditions (Cont.)

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
PO0157PC2 Condition No. 4	Rule 26 NO_x Emission Limits Nebraska Boiler	•CEMs for fuel consumption, NO_x and O_2 •Report each CEM emission violation w/in 96 hours •Daily zero and span drift checks when boiler is in operation •CEM records including the date, time, and duration of any startup, shutdown, or malfunction; emission measurements, testing, calibrations, and maintenance •Annual compliance certification	•CEM records	None	None	
PO0157PC2 Condition No. 5	Rule 26 Fuel Metering Requirements Maxon Duct Burner	•Annual compliance certification •Monitor time and duration of the Maxon Burner's use, and fuel consumption	•Records of time and duration of the Maxon Burner's use, and fuel consumption	None	None	
PO0157PC2 Condition No. 6	Rule 29 Rule 74.34 Rating of Maxon Duct Burner	•Annual compliance certification •Monitor hourly flowrate and heat input at duct burner	•Records of hourly flowrate and heat input at Maxon duct burner	None	None	

1.c.3. General Applicable Requirements

The General Applicable Requirements Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 8 of this permit.

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
50	Rule 50	•Visual inspections •Annual compliance certification, including a formal survey •Opacity readings upon request •Notification required for uncorrectable visible emissions	•All occurrences of visible emissions for periods>3min in any one hour •Annual formal survey of all emissions units	None	•Opacity - EPA Method 9	
54.B.1	Rule 54.B.1	•Annual compliance certification •Follow monitoring requirements under Rule 64 •Upon request, source test for sulfur compounds at point of discharge	None	None	•Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A,16B, or SCAQMD Method 307-91, as appropriate	•Compliance with Rule 64 ensures compliance with this rule based on District analysis
54.B.2	Rule 54.B.2	•Annual compliance certification •Determine ground or sea level concentrations of SO_2, upon request	•Representative fuel analysis or exhaust analysis and compliance demonstration	None	•SO_2 - BAAQMD Manual of Procedures, Vol.VI, Section 1, Ground Level Monitoring for H_2S and SO_2	
55	Rule 55	•Annual compliance certification	•Specific activity records as applicable	None	•EPA Method 9	
57.1	Rule 57.1	•Annual compliance certification	None	None	None	•Not required based on District analysis
64.B.1	Rule 64.B.1	•Annual compliance certification •None for PUC-quality gas, propane, or butane •Annual test if gas is other than PUC-quality gas, propane, or butane (submit with annual compliance certification)	•Annual fuel gas analysis if gas is other than PUC-quality gas, propane, or butane	None	•SCAQMD Method 307-94 or ASTM D1072-90(1994)	

1.c.3. General Applicable Requirements (Continued)

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
64.B.2	Rule 64.B.2	•Annual compliance certification •ARB certified diesel fuel or fuel supplier's certification, or fuel test per each delivery (submit with annual compliance certification)	Records of ARB certified diesel or Fuel supplier's certification, or fuel test per each delivery	None	ASTM Method D4294-98 or D2622-98	
68	Rule 68	•Annual compliance certification	None	None	None	•Not required based on District EPA emission factor analysis
74.6	Rule 74.6	•Annual compliance certification •Maintain current solvent information •Upon request, solvent testing •Measurement of freeboard height and drain hole area for cold cleaners (as applicable)	•Records of current solvent information	None	•ROC content-EPA Test Method 24 •Identity of solvent components-ASTM E168-67, ASTM E169-87, or ASTM E260-85 •True vapor pressure or composite partial pressure - ASTM D2879-86 or other methods per Rule 74.6.G.5 •Initial boiling point-ASTM 1078-78 or published source •Spray gun active/passive solvent losses-SCAQMD Method (10-3-89)	
74.11.1	Rule 74.11.1	•Annual compliance certification •Maintain identification records of large water heaters and small boilers	•Records of current information of large water heaters and small boilers	None	None	•Rule only applies to the installation of large water heaters and small boilers
74.22	Rule 74.22	•Annual compliance certification •Maintain furnace identification records	•Records of current furnace information	None	None	•Rule only applies to future installation of natural gas-fired, fan-type furnaces

1.c.4. General Requirements for Short-Term Activities

The General Requirements for Short-Term Activities Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 9 of this permit.

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
74.1	Rule 74.1	•Annual compliance certification •Visual inspections of abrasive blasting operation •Abrasive blasting records	•Abrasive blasting records	None	•Visible emission evaluation-Section 92400 of CCR	
74.2	Rule 74.2	•Annual compliance certification •Maintain VOC records of coatings used	•Maintain VOC records of coatings used	None	•As required by Rule 74.2.G	
40CFR61.M	40 CFR Part 61, Subpart M	•Annual compliance certification •See 40 CFR Part 61.145 for inspection procedures	•See 40 CFR Part 61.145 for recordkeeping procedures	•See 40 CFR Part 61.145 for notification procedures	•See 40 CFR Part 61.145 for test methods	

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Attachment B

Deviation Occurrences

18141 Beach Boulevard, Suite 200 • Huntington Beach, CA 92648 • 949.352.4941 Office • 714.362.9085 Fax

NEW INDY
CONTAINERBOARD

October 12, 2021

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

Attention: Ed Swede
Subject: New-Indy Oxnard - Nebraska Boiler

Dear Mr. Swede:

New-Indy Oxnard is submitting this follow-up report for the call made to VCAPCD Hotline by Gissele Vazquez on October 8, 2021, at 9:30 AM.

During daily emission review on October 8th at around 8:30 AM, it was observed that Nebraska boiler did not operate within the Flue Gas Recirculation (FGR) tune up parameters. It intermittently operated above the maximum FGR VFD tune up output and speed (see attached tune up data for reference). The plant was operating on the auxiliary boiler during a primary unit outage. The boiler's fuel valve was malfunctioning during the operation, hence it was replaced and calibrated. The fuel valve replacement and calibration affected the FGR high end speed. As an immediate corrective action, the plant reduced the boiler's maximum gas flow from 90% to 86% firing rate. It will operate at this lower firing rate until a boiler tune up is completed.

The Nebraska boiler intermittently operated above the FGR tune up parameters from October 7, 2021 at 7:51 AM to October 8, 2021 at 9:07 AM. There were no excess NOx emissions during this period. The Daily Emission Sheets, PI trends, ABB trends, and Environmental Incident Report have been provided for your review. If you have any questions or require any additional information, please call me at (805) 271-7284.

Sincerely,

Robyn Lebrilla
Environmental Engineer

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

Ventura County
Air Pollution

Control District

RESPONSIBLE OFFICIAL'S CERTIFICATION FORM

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

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

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

Certification by Responsible Official

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

Signature and Title of Responsible Official:	Date:
Signature: [signature]	10/12/2021
Title: Mill Manager	

Start Time: 10/7/2021 7:00

Nebraska Boiler Emission Report

End Time: 10/8/2021 7:00

Time	Nebraska O2 % O2	Nebraska NOx ppm	Nebraska Corrected NOx, ppm (3% O2)	NOx LB/Hour	CO LB/Hour	Nebraska Gas Consumption SCFH
7:00						
7:15	5.87	26.25	31.27			
7:30	5.98	26.08	31.30			
7:45	5.49	26.13	30.38			
8:00	5.33	26.36	30.67	0.002	15	49326
8:15	6.08	32.06	29.56			
8:30	4.95	25.53	29.35			
8:45	4.58	25.43	27.93			
9:00	3.45	27.21	27.95	0.002	16	49901
9:15	4.83	27.37	30.52			
9:30	4.68	26.87	29.67			
9:45	5.25	26.47	30.28			
10:00	4.99	27.00	30.40	0.002	19	60481
10:15	4.59	26.63	29.23			
10:30	4.73	26.20	29.00			
10:45	4.85	26.17	29.19			
11:00	5.01	26.43	29.77	0.002	18	56840
11:15	5.00	26.79	30.17			
11:30	4.69	27.55	30.45			
11:45	4.61	28.41	31.23			
12:00	4.75	27.96	30.99	0.003	22	69817
12:15	5.00	28.40	31.97			
12:30	5.06	28.47	32.17			
12:45	5.07	28.81	32.57			
13:00	4.89	28.82	32.22	0.003	24	77002
13:15	4.98	28.52	32.07			
13:30	5.10	28.61	32.40			
13:45	4.89	28.76	32.16			
14:00	5.10	28.98	32.84	0.003	24	77727
14:15	5.00	28.87	32.50			
14:30	5.12	29.26	33.18			
14:45	5.04	29.21	32.95			
15:00	4.95	29.13	32.70	0.003	24	76965
15:15	4.96	28.96	32.52			
15:30	4.99	28.74	32.32			
15:45	4.98	28.66	32.22			
16:00	5.03	28.42	32.06	0.003	24	78349
16:15	4.92	28.57	32.01			
16:30	4.91	28.61	32.04			
16:45	5.08	28.72	32.51			
17:00	5.23	29.07	33.21	0.003	25	79461
17:15	5.08	29.00	32.81			
17:30	4.97	28.76	32.31			
17:45	5.08	28.61	32.37			
18:00	5.01	28.66	32.28	0.003	24	77183
18:15	5.04	29.25	33.02			
18:30	4.98	29.15	32.77			
18:45	4.97	29.00	32.59			
19:00	4.88	29.06	32.47	0.003	24	76293
19:15	4.95	29.11	32.66			
19:30	4.97	28.81	32.38			
19:45	4.97	28.82	32.39			
20:00	4.93	28.72	32.19	0.003	24	75691
20:15	4.97	29.15	32.77			
20:30	4.93	29.10	32.62			
20:45	4.92	28.83	32.30			
21:00	4.92	29.11	32.61	0.003	23	74290
21:15	4.91	28.97	32.43			
21:30	4.93	29.01	32.51			
21:45	4.91	29.12	32.59			
22:00	4.93	28.91	32.40	0.003	23	73920
22:15	4.88	28.97	32.37			
22:30	4.92	29.09	32.58			
22:45	4.92	29.05	32.54			
23:00	4.94	28.94	32.45	0.003	23	73771
23:15	4.94	28.89	32.39			
23:30	5.04	28.80	32.50			
23:45	5.03	28.85	32.52			
0:00	4.92	28.43	31.85	0.003	23	74168
0:15	4.91	28.78	32.22			
0:30	4.91	28.74	32.17			
0:45	4.86	28.86	32.21			
1:00	4.86	29.09	32.46	0.003	23	73781
1:15	4.86	29.20	32.57			
1:30	4.89	28.89	32.29			
1:45	4.90	29.07	32.51			
2:00	4.83	28.97	32.26	0.003	23	73382
2:15	4.89	29.31	32.76			
2:30	4.92	29.14	32.64			
2:45	4.91	28.50	31.90			
3:00	4.93	28.42	31.85	0.003	23	73322
3:15	4.96	28.60	32.11			
3:30	5.03	28.70	32.36			
3:45	5.06	28.75	32.49			
4:00	5.01	28.66	32.28	0.003	23	73726
4:15	4.95	28.79	32.31			
4:30	4.89	28.63	32.24			
4:45	4.94	28.80	32.30			
5:00	4.95	28.87	32.39	0.003	23	73402
5:15	4.96	28.53	32.03			
5:30	4.94	28.52	31.98			
5:45	4.99	29.02	32.65			
6:00	4.95	28.95	32.49	0.003	23	73542
6:15	4.89	28.77	32.17			
6:30	4.93	28.72	32.19			
6:45	4.90	28.49	31.87			
7:00	4.91	28.42	31.82	0.003	23	75050
Total Gas Usage (SCF)						**1,717,390**

Nebraska Daily Total NOx LB/day	Nebraska Daily Total CO LB/day
0.07	533.49

Nebraska Daily Average NOx LB/hour	Nebraska Daily Average CO LB/hour
0.003	22.23

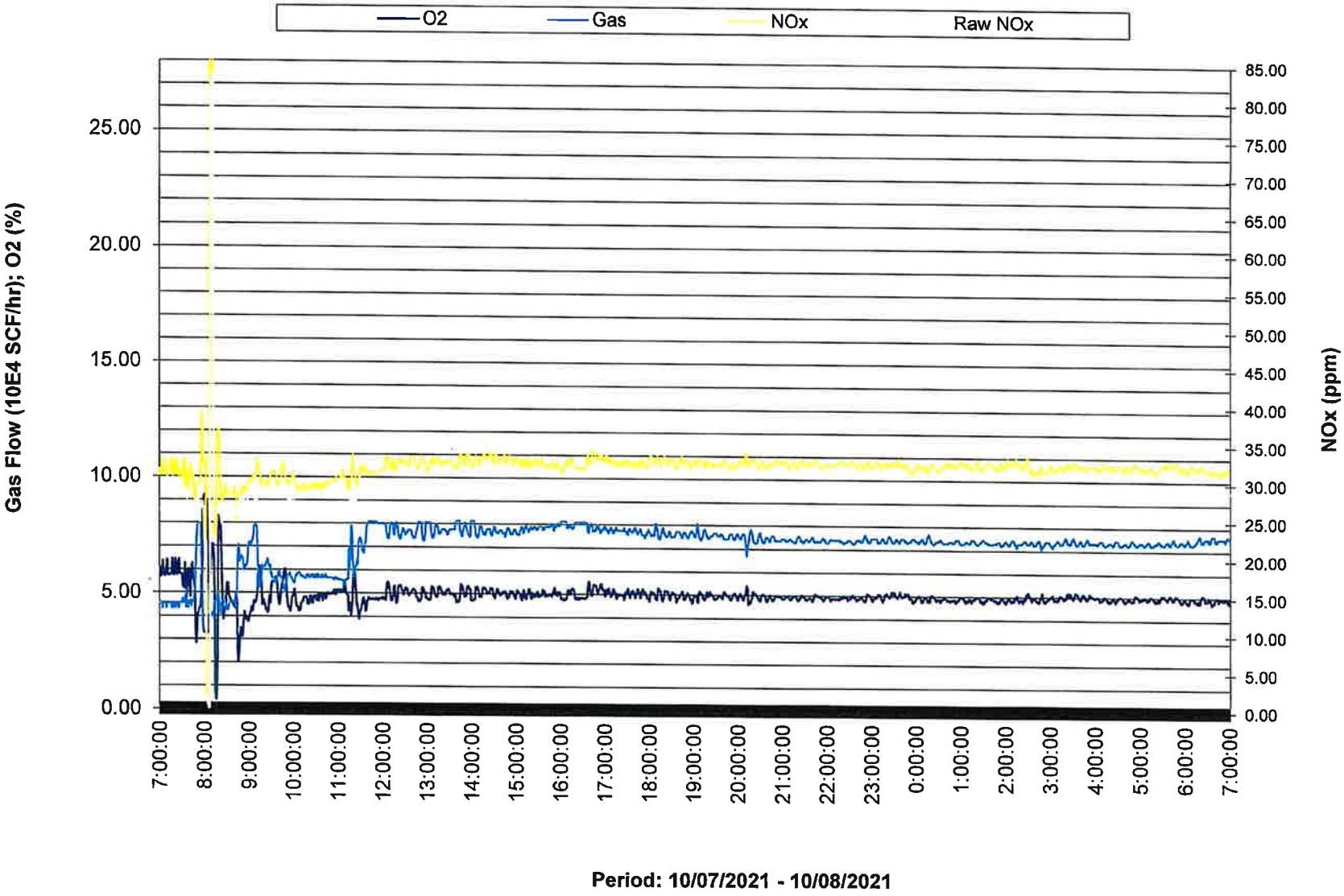
Stack NOx analyzer	
zero value	0.05
zero drift %	0.05
span value	83.15
span drift %	0.60

Stack O2 analyzer	
span value	8.11
span drift %	0.23
zero value	0.41
zero drift %	0.41

Comments: Nebraska Boiler ran from 10/07/21 7:00 AM - 10/08/21 7:00 AM. A total of 24 hours.

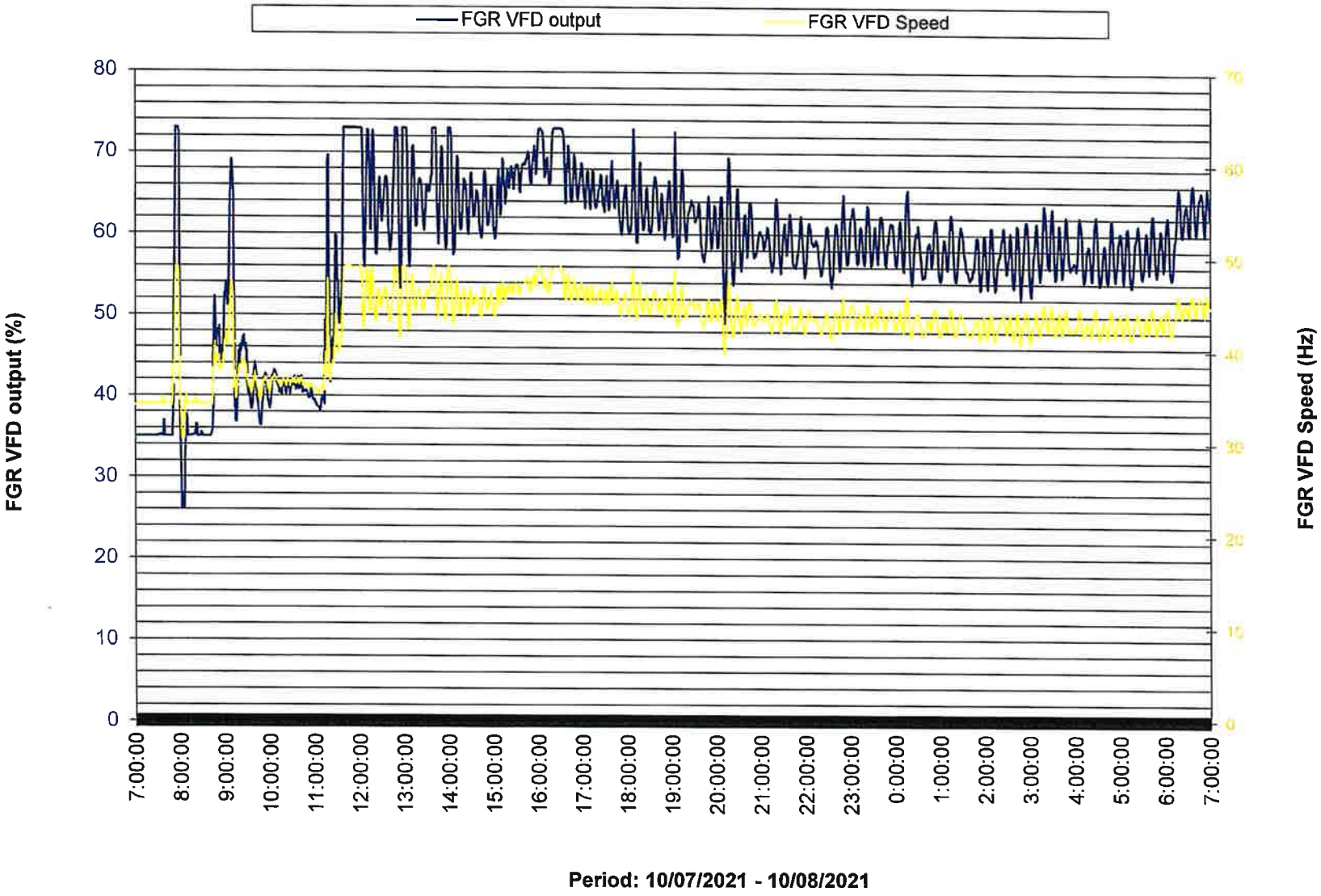
PRINT TIME: 10/11/2021 3:15 PM
NOTE: This document is valid for only ONE week after print time

Nebraska Boiler - Daily Environmental Report



Period: 10/07/2021 - 10/08/2021

Nebraska Boiler - Daily Environmental Report



Period: 10/07/2021 - 10/08/2021

Start Time: 10/8/2021 7:00

Nebraska Boiler Emission Report

End Time: 10/9/2021 7:00

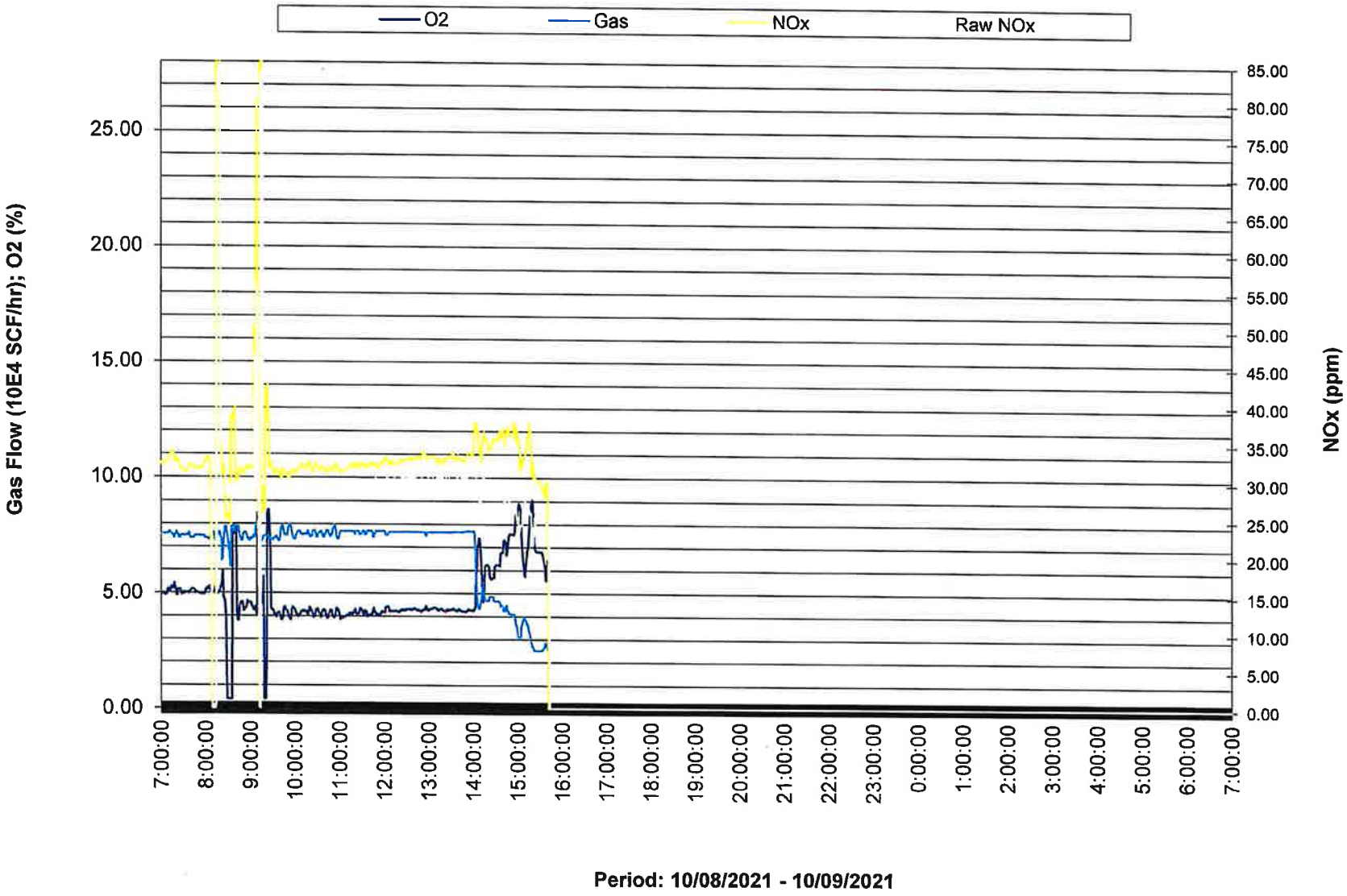
Time	Nebraska O2 % O2	Nebraska NOx ppm	Nebraska Corrected NOx, ppm (3% O2)	NOx LB/Hour	CO LB/Hour	Nebraska Gas Consumption SCFH
7:00						
7:15	5.04	28.76	32.45			
7:30	5.10	28.69	32.50			
7:45	5.06	27.81	31.42			
8:00	4.99	28.03	31.54	0.003	23	74863
8:15	5.13	16.94	32.58			
8:30	4.18	46.78	30.37			
8:45	4.26	28.53	31.79			
9:00	4.49	28.67	31.26	0.003	23	74492
9:15	4.74	30.42	33.35			
9:30	4.75	37.12	33.78			
9:45	4.05	29.13	30.95			
10:00	4.19	28.84	30.90	0.003	23	75017
10:15	4.13	29.41	31.39			
10:30	4.16	29.63	31.68			
10:45	4.10	29.48	31.41			
11:00	4.14	29.56	31.57	0.003	24	75732
11:15	4.00	29.53	31.27			
11:30	4.18	29.80	31.91			
11:45	4.10	29.93	31.88			
12:00	4.13	29.98	32.00	0.003	24	76469
12:15	4.27	30.12	32.42			
12:30	4.24	30.07	32.31			
12:45	4.30	30.42	32.79			
13:00	4.28	30.78	33.15	0.003	24	76275
13:15	4.32	30.48	32.91			
13:30	4.27	30.39	32.70			
13:45	4.27	30.71	33.06			
14:00	4.24	30.72	33.00	0.003	24	76477
14:15	5.83	29.39	35.00			
14:30	5.95	29.15	34.90			
14:45	6.67	28.31	35.62			
15:00	7.69	26.82	36.34	0.002	14	46232
15:15	7.20	25.69	33.66			
15:30	7.57	24.03	32.42			
15:45	9.23	23.81	23.39			
16:00	20.90	0.00	0.00	0.001	9	29718
16:15	20.90	0.00	0.00			
16:30	20.90	0.00	0.00			
16:45	20.90	0.00	0.00			
17:00	20.90	0.00	0.00	0.000	0	0
17:15	20.90	0.00	0.00			
17:30	20.90	0.00	0.00			
17:45	20.90	0.00	0.00			
18:00	20.90	0.00	0.00	0.000	0	0
18:15	20.90	0.00	0.00			
18:30	20.90	0.00	0.00			
18:45	20.90	0.00	0.00			
19:00	20.90	0.00	0.00	0.000	0	0
19:15	20.90	0.00	0.00			
19:30	20.90	0.00	0.00			
19:45	20.90	0.00	0.00			
20:00	20.90	0.00	0.00	0.000	0	0
20:15	20.90	0.00	0.00			
20:30	20.90	0.00	0.00			
20:45	20.90	0.00	0.00			
21:00	20.90	0.00	0.00	0.000	0	0
21:15	20.90	0.00	0.00			
21:30	20.90	0.00	0.00			
21:45	20.90	0.00	0.00			
22:00	20.90	0.00	0.00	0.000	0	0
22:15	20.90	0.00	0.00			
22:30	20.90	0.00	0.00			
22:45	20.90	0.00	0.00			
23:00	20.90	0.00	0.00	0.000	0	0
23:15	20.90	0.00	0.00			
23:30	20.90	0.00	0.00			
23:45	20.90	0.00	0.00			
0:00	20.90	0.00	0.00	0.000	0	0
0:15	20.90	0.00	0.00			
0:30	20.90	0.00	0.00			
0:45	20.90	0.00	0.00			
1:00	20.90	0.00	0.00	0.000	0	0
1:15	20.90	0.00	0.00			
1:30	20.90	0.00	0.00			
1:45	20.90	0.00	0.00			
2:00	20.90	0.00	0.00	0.000	0	0
2:15	20.90	0.00	0.00			
2:30	20.90	0.00	0.00			
2:45	20.90	0.00	0.00			
3:00	20.90	0.00	0.00	0.000	0	0
3:15	20.90	0.00	0.00			
3:30	20.90	0.00	0.00			
3:45	20.90	0.00	0.00			
4:00	20.90	0.00	0.00	0.000	0	0
4:15	20.90	0.00	0.00			
4:30	20.90	0.00	0.00			
4:45	20.90	0.00	0.00			
5:00	20.90	0.00	0.00	0.000	0	0
5:15	20.90	0.00	0.00			
5:30	20.90	0.00	0.00			
5:45	20.90	0.00	0.00			
6:00	20.90	0.00	0.00	0.000	0	0
6:15	20.90	0.00	0.00			
6:30	20.90	0.00	0.00			
6:45	20.90	0.00	0.00			
7:00	20.90	0.00	0.00	0.000	0	0
Total Gas Usage (SCF)						**605,275**

Comments: Nebraska Boiler ran from 10/08/21 7:00 AM - 3:43 PM, a total of 8.72 hours

Nebraska Daily Total NOx LB/day	Nebraska Daily Total CO LB/day
0.02	188.02
Nebraska Daily Average NOx LB/hour	**Nebraska Daily Average CO LB/hour**
0.001	7.83
Stack NOx analyzer	
zero value	-0.18
zero drift %	-0.18
span value	84.36
span drift %	2.07
Stack O2 analyzer	
span value	7.99
span drift %	-1.22
zero value	0.38
zero drift %	0.38

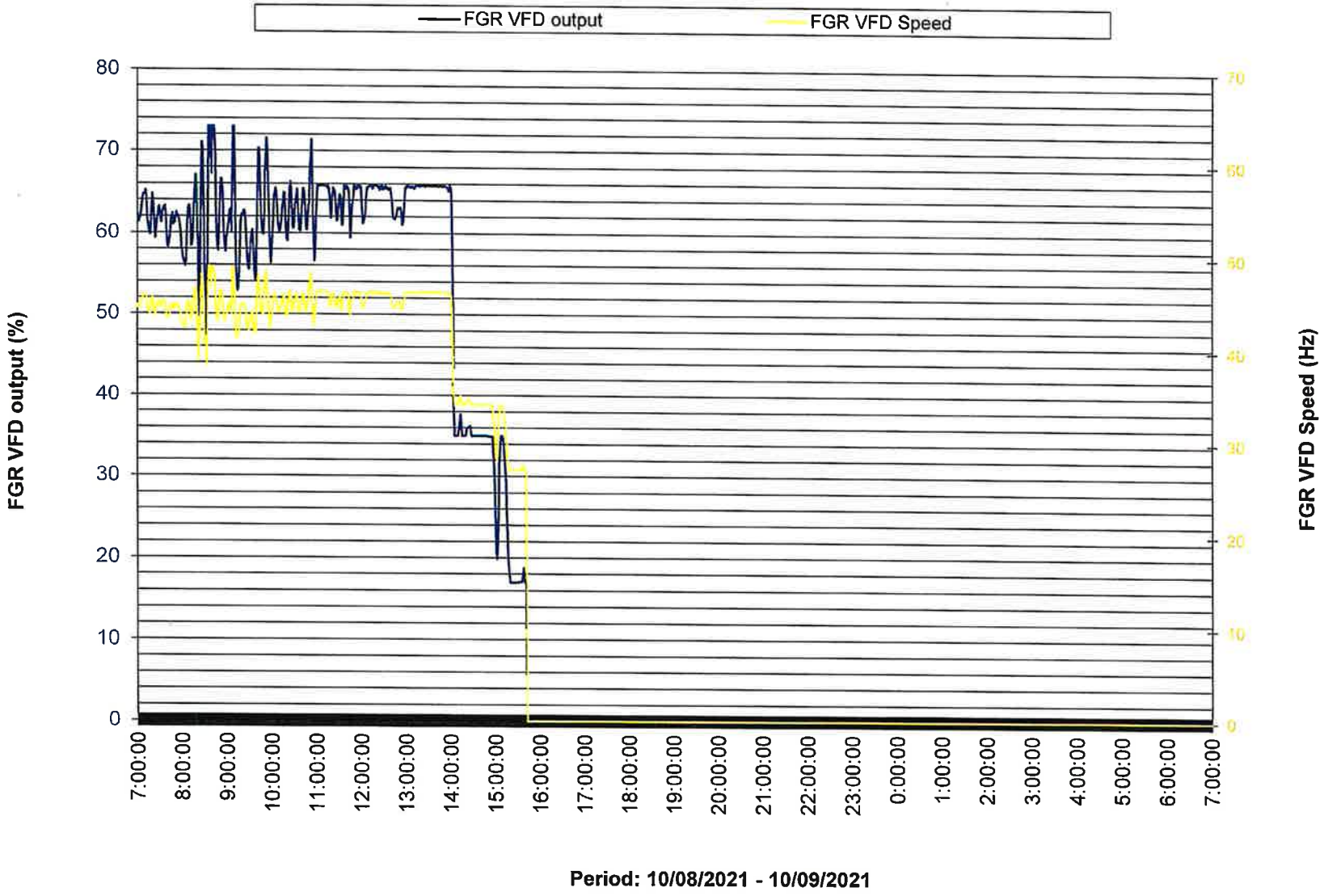
PRINT TIME: 10/8/2021 5:16 PM
NOTE: This document is valid for only ONE week after print time

Nebraska Boiler - Daily Environmental Report



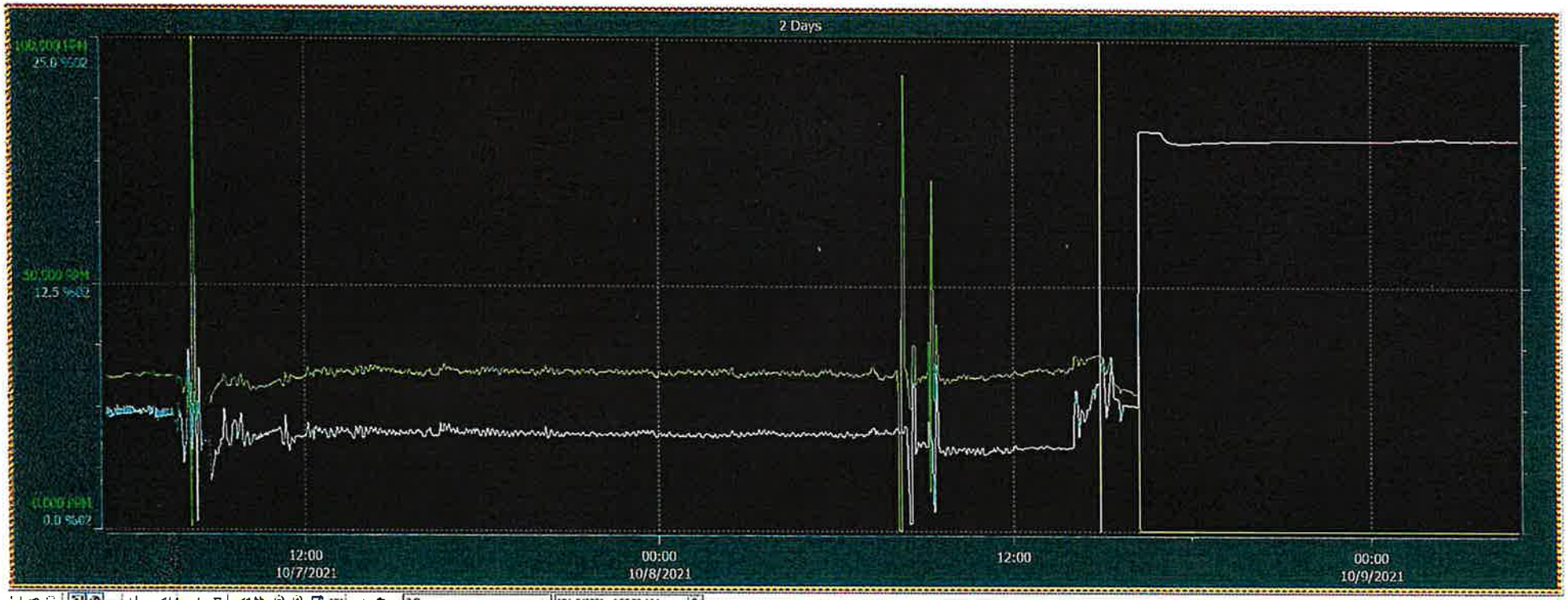
Period: 10/08/2021 - 10/09/2021

Nebraska Boiler - Daily Environmental Report



Period: 10/08/2021 - 10/09/2021

Root/Oxnard Mill/921 Area/921-018 DEAERATOR FEED WATER STORAGE TANK/931AI391_CNOX:Trend Display



2 Days | 10/ 8/2021 4:56:03 AM

	We	S	Obj	#	Object Name	Object Description	Property	Log Name	Current Valu	Low Ra	High Rang	Ruler Time	Ruler Value	Treatment	Filter	Time Offset	Style
1	F				931AI391_CNOX	NEBRASKA COR NOX	VALUE	SEAMLESS	0.000 PPM	0.00	100.000	10/8/2021 2:55:58 PM	36.262 PPM	TimeAverage	0.000	00:00:00 00:00:	Linear
2	F				931AI392_AT	NEBRASKA BOILER OXYGN	VALUE	SEAMLESS	19.9 %02	0.0	25.0 %0	10/8/2021 2:55:58 PM	8.2 %02	TimeAverage	0.000	00:00:00 00:00:	Linear
3																	
4																	
5																	
6																	

10/11/2021 2:02:34 PM

New Indy Data sheet as of 4-13-18

TUNE-UP DATA

BURNER STARTUP DATASHEET

		Customer															
Date	4/13/2018	Manufacturer	Nebraska			Max Steam production KPPH											
Ambient Air temp	80	Boiler Model				Max Pressure PSIG											
Steam Capacity KPPH	n/a	Boiler S/N				High water level											
Max Fire MMBTU	82	Manufacturer															
Max Fire Rate SCFH	82000	Burner Model															
natural gas BTU	1050	Burner S/N															
Operating PSIG																	
Variable	Source	Units															
			Low	10	20	30	40	50	60	70	80	90	100				
Gas Fuels																	
Nat Gas valve		%	19	19	29	32	36	40	46	50	53	58					
Gas valve feedback			19	24	28	31	35.69	39	45	50	53	58					
Nat Gas Flow		KSCFH	25	24.4	26.3	27.8	33	39.6	48.6	56.9	65	80					
Nat gas BTU	Calculated	MMBTU	26.25	25.62	27.62	29.19	34.65	41.58	51.03	59.75	68.25	84.00					
Calculated % of range		MMBTU	32.0%	31.2%	33.7%	35.6%	42.3%	50.7%	62.2%	72.9%	83.2%	102.4%					
Gas feed Pressure	Gauge	PSIG	10														
Gas Burner Pressure	Gauge	Inch W.C.	3.7	4	4.5	5	6	9.9	15.8	20.5	28.5	33.9					
with O2 trim										56							
Air valve	Damp posit	%	10	16	27	30	42	50	55	60	73	90					
Air valve feedback		%	10	16	27	30	41.9	50	55	60	73	90					
Stack O2		%	4	4	3.5	3.8	3.8	4	3.1	3.2	3	2.9					
Windbox O2%		%	20.4	20	20	20.5	20.5	19.87	18	18.2	18.1	17.9					
% flue gas in windbox		%	2.96%	5.33%	5.17%	2.34%	2.34%	6.09%	16.29%	15.25%	15.64%	16.67%					
FGR VFD output		%	10.0%	10.0%	10.0%	10.0%	20.0%	20.0%	20.0%	38.0%	52.5%	68.0%					
FGR VFD Speed		HZ	24.0	24.0	24.0	24.0	26.0	26.0	26.0	35.1	41.0	47.2					
FGR valve fixed rate		%	12%	50%	50%	50%	50%	50%	50%	50%	50%	50%					
Windbox Pressure		"W.C	1.1	1.1	1.4	1.8	1.8	2.7	3.4	5.3	7.8	10.8					
Furnace Pressure		DegF	0.04	0.04	0.05	0.08	1	1.5	2	2	3	4					
Flame Signal	BMS		-N/A-	-N/A-	-N/A-	-N/A-	-N/A-	-N/A-	-N/A-	-N/A-	-N/A-	-N/A-					
Stack and Feedwater																	
Stack Temperature at outlet		DegF	381	386	391	370	278	371	371	407	412	412					
Stack Temperature at Econo outlet		DegF	531	577	577	579	580	593	605	644	649	665					
Feecwater temp at Econo Inlet		DegF	-N/A-	-N/A-	-N/A-	-N/A-	-N/A-	-N/A-	-N/A-	309	304	309					
Feecwater temp at Econo Outlet		DegF	-N/A-	-N/A-	-N/A-	-N/A-	-N/A-	-N/A-	-N/A-	407	407	407					
Feecwater Pressure at Econo Inlet		DegF	700	700	700	700	700	700	700	700	700	700					
Feecwater Pressure at Boiler		DegF	-N/A-	-N/A-	-N/A-	-N/A-	-N/A-	-N/A-	-N/A-	-N/A-	-N/A-	-N/A-					
Steam Pressure																	
Header pressure		PSIG								450.0	450.0	450.0					
Drum Pressure		PSIG	450.0	450.0	450.0	450.0	450.0	450.0	450.0	460.0	460.0	460.0					
Steam Flow		KPPH															
Drum Level		Inches									0.0						
Superheater inlet Steam Temp		Deg F	420	436.0	425.0	434.0	434.0	434.0	429.0	446.0	438.0	440.0					
Superheater Outlet Steam Temp		Deg F	560	639.0	650.0	671.0	679.0	694.0	710.0	739.0	755.0	760.0					
Combustion Readings																	
CEMS O2		%	6	5	4	5	5	5	5	4.4	3.9	3.3					
CEMS Nox		PPM	34	31	33	34	35	35	35	35.8	35.5	37.6					
portable O2- RFM ECOM J2KN												4.9					
CO												0					
Nox												30					

Hueneme Mill Environmental Incident Report

Shaded section to be completed by the EMR

Name of Incident: Nebraska Boiler FGR output & speed were not within the tune-up parameters	Incident Date: 10/7/2021
Exact Location Incident: Boiler area	
Reported By: Gissele Vazquez	Estimated Start and Stop Times of Incident: Start- 10/7/21 7:51 AM - 10/8/21 10:53 AM
Possible Cause: Fuel valve malfunction	

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

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

Detailed Description of Event:

The plant was operating on the auxiliary boiler during a primary unit outage. The fuel valve was malfunctioning during the operation. The auxiliary boiler was taken off-line, the fuel valve was replaced and calibrated. The fuel valve replacement and calibration affected the FGR high end speed. There were no NOx excess emissions during this incident.

(if required use additional paper and attach)

Estimated Amount Released	pH	CONSISTENCY (%)	Estimated Monetary Loss
☐ _____ Gallons ☐ _____ Pounds ☐ Other N/A	N/A	N/A	

List Any External Emergency Clean Up Personnel Contacted: N/A	List Any External Agencies Contacted *(Agency, person and time of call.)*: *APCD 10/7/21, 9:30 AM*
List Hueneme Personnel Contacted *(Foreman, Mill Manager, etc.)*: Rudy Rehbein	Any Acute or Chronic Health Risks *(refer to MSDS)*:
Describe Any Emergency Response Actions: The plant reduced the maximum gas flow from 90% firing to 86% firing.	
Suggestions to Prevent Reoccurrence: 1. Perform boiler tune up. Operate the boiler at 86% firing rate until tune up is completed.	Estimated Completion Date: 1. April 2022
2.	2.
Root Cause after investigation: Fuel valve malfunction.	Severity Level *(level 1 and 2 must be tracked through SHIMS)*: ☐ 1 ☐ 2 ☐ 3 ☐ 4
Investigated By: Rudy Rehbein / OEM Contractor RF McDonald	Investigated Date October 8, 2021

Follow Up	By When	Completion Date	By Whom

Issued by	Reviewed by	Approved by
Department Manager 10/12/21	Technical Superintendent 10/11/2021	Mill Manager 10/12/2021

Print Time: 10/11/2021 3:24:49 PM

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

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Attachment C

Cogen Annual Source Test Summary of Results

18141 Beach Boulevard, Suite 200 • Huntington Beach, CA 92648 • 949.352.4941 Office • 714.362.9085 Fax

AIRx Testing Services, Inc.

LM2500 – PK GENERAL ELECTRIC
GAS TURBINE
ANNUAL COMPLIANCE and RATA EMISSIONS TESTING
VCAPCD PTO #0157
March 9, 2022

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

Attn: Robyn Lebrilla

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

For Submission to:
Ventura County Air Pollution Control District
4567 Telephone Rd.
2nd Floor
Ventura, California 93003

Attn: Ed Swede

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

Job No.: 23022

Lab No.: 222-034

Ken Kennepohl
Test Team Leader

Reviewed by:
Tom Porter

Submitted
April 6, 2022

AIR Testing Services, Inc.

SUMMARY OF SOURCE TEST RESULTS

New Indy
Gas Turbine
Rosemount CEM
3/9/2022

CONSTITUENTS	Run 1	Run 2	Run 3	*Average*	*Allowable*
NOx, ppmv:	10.6	10.5	10.5	*10.5*	-
NOx ppmv @ 15 % O2:	10.2	10.0	9.8	*10.0*	*12*
NOx, lb/hr:	10.79	10.64	10.54	*10.66*	-
NOx, lb/MMBtu	0.0012	0.0012	0.0012	*0.0012*	-
CO, ppmv:	28.2	28.5	28.7	*28.5*	-
CO, ppmv @ 15% O2:	27.2	27.1	26.9	*27.0*	-
CO, lb/hr:	17.45	17.67	17.53	*17.55*	*59.65*
CO, lb/MMBtu	0.0020	0.0020	0.0020	*0.0020*	-
O2, %:	14.8	14.7	14.6	*14.7*	-
NH3, ppmv:	12.6	12.5	12.2	*12.5*	-
NH3, ppmv @ 15% O2:	12.2	11.9	11.5	*11.8*	*20*
Stack Flow:	141873	142059	140419	*141451*	-
Ammonia Injection Rate, lb/hr (avg):	24.74	24.10	24.16	*24.33*	-
Fuel Usage (Turbine & Duct), dscfm:	4550.9	4613.4	4626.0	*4596.8*	-
Turbine Load, MWh (avg):	24.95	25.20	25.25	*25.13*	-

AIRx Testing Services, Inc.

New Indy
Turbine
3/9/2022

CEMS RATA
Calculations

Run	AIRx Testing - Reference Method		
	NOx ppmv @ 15% O2	O2 Dry %	CO ppmv @ 15% O2
1	10.34	14.76	27.40
2	9.67	14.76	27.40
3	10.68	14.78	26.63
4	9.90	14.73	27.08
5	10.1	14.67	27.15
6	9.81	14.65	27.15
7	10.04	14.63	27.06
8	9.90	14.60	26.80
9	9.50	14.57	26.60

Run	New Indy		CEMS
	NOx ppmv @ 15%	O2 Dry %	CO ppmv @ 15%
1	10.13	14.46	27.77
2	9.83	14.47	26.97
3	9.89	14.43	26.98
4	10.01	14.39	27.24
5	10.02	14.35	27.35
6	9.98	14.35	27.46
7	10.08	14.34	27.42
8	10.07	14.33	27.30
9	10.05	14.34	27.31

Run	Reference Method - CEM, Difference		
	NOx ppmv @ 15%	O2 Dry %	CO ppmv @ 15%
1	0.2	0.3	-0.4
2	-0.2	0.3	0.4
3	0.8	0.3	-0.3
4	-0.1	0.3	-0.2
5	0.1	0.3	-0.2
6	-0.2	0.3	-0.3
7	0.0	0.3	-0.4
8	-0.2	0.3	-0.5
9	-0.6	0.2	-0.7

Arithmetic Mean, d	0.0	0.3	-0.3
Standard Deviation, Sd	0.4	0.0	0.3
Confidence Coefficient, CC	0.3	0.0	0.2
Avg Reference Method, RM	10.0	14.7	27.0
Relative Accuracy, RA	**3.0**	**2.2**	**1.9**

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

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Attachment D

Nebraska Boiler Usage and Capacity Factor Calculation

18141 Beach Boulevard, Suite 200 ▪ Huntington Beach, CA 92648 ▪ 949.352.4941 Office ▪ 714.362.9085 Fax

Attachment 103N5-0157

Nebraska Boiler Monthly Fuel Usage and Capacity Factor Calculation

Month	Actual Fuel Usage (mmcf/month)	x	Heating Value (mmBTU/mmcf)	=	Actual Fuel Usage (mmBTU/month)		Theoretical Fuel Usage (mmBTU/month)	Rolling 12-Month Capacity Factor (%)
Apr-20	0.00		1039		0.00		77,760	
May-20	2.77		1032		2,854.30		80,352	
Jun-20	18.13		1022		18,526.26		77,760	
Jul-20	7.72		1024		7,903.30		80,352	
Aug-20	0.00		1026		0.00		80,352	
Sep-20	0.00		1032		0.00		77,760	
Oct-20	14.54		1030		14,977.50		80,352	
Nov-20	10.87		1040		11,305.20		77,760	
Dec-20	4.07		1040		4,229.52		80,352	
Jan-21	12.95		1039		13,458.23		80,352	
Feb-21	0.00		1039		0.00		72,576	
Mar-21	2.71		1037		2,807.53		80,352	
Apr-21	0.65		1033		675.23		77,760	8.11%
May-21	0.24		1032		246.17		80,352	7.84%
Jun-21	0.28		1031		285.10		77,760	5.91%
Jul-21	0.00		1031		0.00		80,352	5.07%
Aug-21	0.00		1031		0.00		80,352	5.07%
Sep-21	0.00		1030		0.00		77,760	5.07%
Oct-21	3.68		1034		3,804.38		80,352	3.89%
Nov-21	0.05		1033		53.30		77,760	2.70%
Dec-21	0.00		1034		0.00		80,352	2.25%
Jan-22	0.37		1034		382.89		80,352	0.87%
Feb-22	0.00		1033		0.00		72,576	0.87%
Mar-22	0.19		1027		197.57		80,352	0.60%
							Permit Limit	<30%
							Exceeds Permit Limit?	No

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Attachment E

2021 Emergency Engine Annual Report

18141 Beach Boulevard, Suite 200 • Huntington Beach, CA 92648 • 949.352.4941 Office • 714.362.9085 Fax

NEW INDY
CONTAINERBOARD

January 6, 2022

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

Attention: Mr. Ed Swede

Subject: 2021 Annual Report for Emergency Generator

Dear Mr. Swede:

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

Unit	2021 Hours of Operation	2021 Maintenance Hours
Admin Emergency Generator WINCO PSS35000 88 HP	0	28

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

Sincerely,

Gissele Vazquez
Environmental Process Engineer I

Ventura County
Air Pollution

Control District

RESPONSIBLE OFFICIAL'S CERTIFICATION FORM

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

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

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

Certification by Responsible Official

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

Signature and Title of Responsible Official:	Date:
Signature: [signature]	01/06/2022
Title: Mill Manager	

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Attachment F

Emergency Engine Maintenance Records

Work Order Details

241142: PM, 1Y, INSPECT ADMIN OFFICE COMPUTER ROOM GENERATOR

Required annual maintenance includes:
Change Oil
Change Oil Filter
Change Spark Plugs
Hose & Belt inspection/replacement as needed

PARTS

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

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

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

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

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

DC24MF GP24 Maeine Battery 750

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

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

Sched Start:	6/4/21
Sched Finish:	
Target Start:	6/4/21
Target Finish:	6/4/21
Actual Start:	10/28/21
Actual Finish:	10/28/21
Report Date:	6/4/21
Reported By:	MAXADMIN
On Behalf Of:	

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

Job Plan:	JP2036
Supervisor:	
Lead:	EMENDOZA
Vendor:	
Person Group:	213
Service:	
Service Group:	
Classification:	

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Attachment G

Equipment Emission Limit Calculations

18141 Beach Boulevard, Suite 200 ▪ Huntington Beach, CA 92648 ▪ 949.352.4941 Office ▪ 714.362.9085 Fax

P0015?PC2 Condition No. 1

Emission Limits

		Gas Turbine		COEN Duct Burner		Nebraska	Gas Turbine/Duct Burner Emissions					Nebraska Boiler Emissions					Total Emissions								
Date	Natural Gas High Heating Value (mmBTU/mmcf)	Monthly Usage therms	scf	Monthly Usage therms	scf	Boiler Monthly Usage scf	CO tons/mo	NOx tons/mo	ROC tons/mo	PM tons/mo	SOx tons/mo	CO tons/mo	NOx tons/mo	ROC tons/mo	PM tons/mo	SOx tons/mo	CO tons/mo	Rolling 12 Month Emissions - CO tons/yr	NOx tons/mo	Rolling 12 Month Emissions - NOx tons/yr	ROC tons/mo	Rolling 12 Month Emissions - ROC tons/yr	PM tons/mo	Rolling 12 Month Emissions - PM tons/yr	SOx tons/mo	Rolling 12 Month Emissions - SOx tons/yr
Apr-20	1039	1868798	179865063	74898	7208653	0	5.44	3.95	0.20	0.69	0.06	0.00	0.00	0.00	0.00	0.00	5.44		3.95		0.20		0.69		0.06	
May-20	1032	1780101	172490407	70436	6825148	2765791	5.05	3.79	0.19	0.66	0.05	0.43	0.05	0.01	0.01	0.00	5.48		3.84		0.20		0.67		0.05	
Jun-20	1022	1036141	101383659	38561	3773048	18127459	3.30	2.16	0.11	0.39	0.03	2.82	0.33	0.05	0.07	0.01	6.12		2.49		0.16		0.46		0.04	
Jul-20	1024	1620955	158296387	61981	6052875	7718065	5.02	3.38	0.17	0.60	0.05	1.20	0.10	0.02	0.03	0.00	6.22		3.48		0.20		0.63		0.05	
Aug-20	1026	1909530	186114035	72192	7036262	0	5.88	3.89	0.21	0.71	0.06	0.00	0.00	0.00	0.00	0.00	5.88		3.89		0.21		0.71		0.06	
Sep-20	1032	1799559	174375872	67495	6478183	0	5.69	3.71	0.19	0.67	0.05	0.00	0.00	0.00	0.00	0.00	5.69		3.71		0.19		0.67		0.05	
Oct-20	1030	1111880	107949515	63470	6162103	14541264	3.65	2.32	0.12	0.42	0.03	2.26	0.28	0.04	0.06	0.00	5.91		2.60		0.16		0.48		0.04	
Nov-20	1040	1420913	136626250	56597	5442020	10870382	5.64	3.02	0.15	0.52	0.04	1.69	0.21	0.03	0.04	0.00	7.33		3.23		0.18		0.56		0.05	
Dec-20	1040	1702898	163740192	84512	8126167	4066843	6.05	3.58	0.18	0.63	0.05	0.63	0.07	0.01	0.02	0.00	6.68		3.65		0.19		0.65		0.05	
Jan-21	1039	1385228	133323195	77133	7423800	12953060	4.01	3.15	0.15	0.52	0.04	1.91	0.23	0.04	0.05	0.00	5.92		3.38		0.19		0.57		0.05	
Feb-21	1039	1645299	158354090	87534	8424802	0	3.83	3.37	0.18	0.61	0.05	0.00	0.00	0.00	0.00	0.00	3.83		3.37		0.18		0.61		0.05	
Mar-21	1037	1686212	162604822	64109	6182177	2707362	4.10	3.44	0.18	0.62	0.05	0.42	0.05	0.01	0.01	0.00	4.52		3.49		0.19		0.63		0.05	
Apr-21	1033	1743126	168711800	75279	6372024	653538	5.25	3.42	0.19	0.64	0.05	0.03	0.01	0.00	0.00	0.00	5.28	68.85	3.43	40.56	0.19	2.23	0.65	7.29	0.05	0.59
May-21	1032	1768626	171405800	62005	5253498	238579	5.24	3.47	0.19	0.65	0.05	0.04	0.01	0.00	0.00	0.00	5.28	68.65	3.48	40.20	0.19	2.22	0.65	7.27	0.05	0.59
Jun-21	1031	1801871	174763200	61829	5243710	276514	5.11	3.54	0.19	0.66	0.05	0.05	0.01	0.00	0.00	0.00	5.16	67.69	3.55	41.25	0.19	2.25	0.66	7.48	0.05	0.61
Jul-21	1031	1837622	178263000	60082	5095500	0	5.49	3.64	0.19	0.67	0.06	0.00	0.00	0.00	0.00	0.00	5.49	66.96	3.64	41.41	0.19	2.25	0.67	7.52	0.06	0.61
Aug-21	1031	1882818	182634000	74095	6283974	0	5.57	3.75	0.20	0.70	0.06	0.00	0.00	0.00	0.00	0.00	5.57	66.65	3.75	41.27	0.20	2.25	0.70	7.50	0.06	0.61
Sep-21	1030	1830953	177815000	64535	5478521	0	4.78	3.63	0.19	0.67	0.05	0.00	0.00	0.00	0.00	0.00	4.78	65.74	3.63	41.19	0.19	2.25	0.67	7.50	0.05	0.61
Oct-21	1034	1625899	157319300	59715	5049734	3681051	5.96	3.17	0.17	0.60	0.05	0.66	0.08	0.01	0.01	0.00	6.62	66.45	3.25	41.85	0.18	2.27	0.61	7.64	0.05	0.62
Nov-21	1033	1805836	174837900	57857	4897326	51601	6.68	3.55	0.19	0.66	0.05	0.01	0.00	0.00	0.00	0.00	6.69	65.81	3.55	42.17	0.19	2.28	0.66	7.74	0.05	0.63
Dec-21	1034	1898049	183524300	63505	5370171	0	7.07	3.75	0.20	0.69	0.06	0.00	0.00	0.00	0.00	0.00	7.07	66.19	3.75	42.27	0.20	2.28	0.69	7.78	0.06	0.63
Jan-22	1034	1845329	178446000	67662	5746470	370264	6.54	3.62	0.20	0.68	0.06	0.07	0.01	0.00	0.00	0.00	6.61	66.88	3.63	42.52	0.20	2.29	0.68	7.90	0.06	0.64
Feb-22	1033	1689532	163540700	77692	6580225	0	5.84	3.35	0.18	0.63	0.05	0.00	0.00	0.00	0.00	0.00	5.84	68.89	3.35	42.50	0.18	2.29	0.63	7.91	0.05	0.64
Mar-22	1027	1854386	180573700	81031	6849382	192379	7.01	3.68	0.20	0.69	0.06	0.03	0.00	0.00	0.00	0.00	7.04	71.41	3.68	42.69	0.20	2.31	0.69	7.97	0.06	0.65
																Permit Limit		97.66		50.00		3.29		10.57		0.85
																Exceeds Permit Limit?		No		No		No		No		No

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Attachment H

Quarterly Visible Emissions Summary

18141 Beach Boulevard, Suite 200 ▪ Huntington Beach, CA 92648 ▪ 949.352.4941 Office ▪ 714.362.9085 Fax

Stack Opacity Observation Protocol

Object:	Cogen Stack
Date of Observation:	06/17/21
Time of Observation:	10:20 AM
Fuel burned:	Natural Gas
Name of the observing person:	Zhen Han
Signature	
Was Visible Emission Other Than Steam Present ?	No

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

Object:	Paper Forming/Paper Drying
Date of Observation:	06/17/21
Time of Observation:	10:20 AM
Fuel burned:	N/A
Name of the observing person:	Zhen Han
Signature	
Was Visible Emission Other Than Steam Present ?	No

Object:	Maxon Burner
Date of Observation:	06/17/21
Time of Observation:	10:20 AM
Fuel burned:	Natural Gas
Name of the observing person:	Zhen Han
Signature	
Was Visible Emission Other Than Steam Present ?	No

Stack Opacity Observation Protocol

Object:	Cogen Stack
Date of Observation:	09/30/21
Time of Observation:	9:46 AM
Fuel burned:	Natural Gas
Name of the observing person:	Gissele Vazquez
Signature	*Gissele Vazquez*
Was Visible Emission Other Than Steam Present ?	NO

Object:	Nebraska Boiler
Date of Observation:	09/30/21
Time of Observation:	9:46 AM
Fuel burned:	N/A
Name of the observing person:	Gissele Vazquez
Signature	*Gissele Vazquez*
Was Visible Emission Other Than Steam Present ?	N/A

Object:	Paper Forming/Paper Drying
Date of Observation:	09/30/21
Time of Observation:	9:46 AM
Fuel burned:	N/A
Name of the observing person:	Gissele Vazquez
Signature	*Gissele Vazquez*
Was Visible Emission Other Than Steam Present ?	NO

Object:	Maxon Burner
Date of Observation:	09/30/21
Time of Observation:	9:46 AM
Fuel burned:	Natural Gas
Name of the observing person:	Gissele Vazquez
Signature	*Gissele Vazquez*
Was Visible Emission Other Than Steam Present ?	NO

Stack Opacity Observation Protocol

Object:	Cogen Stack
Date of Observation:	11/30/21
Time of Observation:	8:00 AM
Fuel burned:	Natural Gas
Name of the observing person:	G.Vazquez
Signature	Gissele Vazquez
Was Visible Emission Other Than Steam Present ?	No

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

Object:	Paper Forming/Paper Drying
Date of Observation:	11/30/21
Time of Observation:	8:00 AM
Fuel burned:	N/A
Name of the observing person:	G.Vazquez
Signature	Gissele Vazquez
Was Visible Emission Other Than Steam Present ?	No

Object:	Maxon Burner
Date of Observation:	11/30/221
Time of Observation:	8:00 AM
Fuel burned:	Natural Gas
Name of the observing person:	G.Vazquez
Signature	Gissele Vazquez
Was Visible Emission Other Than Steam Present ?	No

Stack Opacity Observation Protocol

Object:	Cogen Stack
Date of Observation:	02/18/22
Time of Observation:	10:00 AM
Fuel burned:	Natural Gas
Name of the observing person:	G.Vazquez
Signature	Gissele Vazquez
Was Visible Emission Other Than Steam Present ?	no

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

Object:	Paper Forming/Paper Drying
Date of Observation:	02/18/22
Time of Observation:	10:00 AM
Fuel burned:	N/A
Name of the observing person:	G.Vazquez
Signature	Gissele Vazquez
Was Visible Emission Other Than Steam Present ?	no

Object:	Maxon Burner
Date of Observation:	02/18/22
Time of Observation:	10:00 AM
Fuel burned:	Natural Gas
Name of the observing person:	G.Vazquez
Signature	Gissele Vazquez
Was Visible Emission Other Than Steam Present ?	no

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Attachment I

VCAPCD Rule 54.B.2 Compliance Memorandum

VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT
Memorandum

TO: Karl Krause DATE: May 23, 1996

FROM: Terri Thomas

SUBJECT: Rule 54.B.2 Compliance

Per your request, I ran some screening level dispersion modeling tests to determine equipment parameters that would comply with Rule 54.B.2. Rule 54.B.2 limits ground level property line SO_2 concentrations to 0.25 ppm_v for 1 hour and 0.04 ppm_v for 24 hours.

I assume that the most common SO_2 emission source is diesel combustion in IC engines. Therefore, that was the focus of my analysis.

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

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

SO_2 emissions were based on 300 ppm_v in the stack, which is the limit in Rule 54.B.1.a. This limit cannot be exceed if the diesel fuel meets the 0.5% sulfur limit in Rule 64.B.2.

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

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

Use of the minimum stack diameter, and thus, the minimum flow rate and emission rate is not the most conservative case. In order to determine the maximum emission rate that could be shown to meet the Rule under the conditions described above, modeling was performed by increasing the emissions and flow rate (to maintain the 300 ppm_v SO_2 stack concentration), but increasing the stack diameter to maintain the minimum velocity. Modeling results are summarized below.

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

From the above, if SO_2 emissions do not exceed 1.84 lb/hr, the 1-hour limit of Rule 54.B.2 will be met. This is equivalent to burning 26 gallons of diesel at 0.5% sulfur per hour.

If SO_2 emissions do not exceed 11.04 lb/day, the 24-hour limit of Rule 54.B.2 will be met. This is equivalent to burning 155 gallons of diesel at 0.5% sulfur per day.

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

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

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Attachment J

VCAPCD Rule 57.B Memorandum

VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT
Memorandum

TO: Interested Parties DATE: December 3, 1997

FROM: John Harader

SUBJECT: Rule 57.B / AP-42 Emission Factor Comparison

Section B of District Rule 57, "Combustion Contaminants - Specific", limits the combustion contaminant emission concentration from any fuel burning equipment. Combustion contaminants are defined in District Rule 2 as particulate matter discharged into the atmosphere from the burning of any kind of material containing carbon in a free or combined state. The emission concentration limit is 0.1 grain per cubic foot of gas calculated to 12 percent of carbon dioxide at standard conditions (0.1 gr/scf @ 12% CO_2). This limit can be converted to a lb/MMBTU emission factor by the following equation from 40 CFR Part 60, Appendix A, Method 19:

$$E = C F_c (100/\%CO_2)(lb/7000gr)$$

E = lb/MMBTU emission factor
C = Pollutant concentration (lb/DSCF)
F_c = CO_2 F-factor
= 1430 dscf CO_2/MMBTU for liquid fuels
= 1040 dscf CO_2/MMBTU for natural gas

The pollutant concentration, C, and the $\%CO_2$ values can be wet or dry as long as they are consistent. The $\%CO_2$ of 12 may be used in the equation if the pollutant concentration has been corrected to 12% CO_2:

$$C_{@12\%CO2} = C(12/\%CO_2)$$

The Rule 57.B emission limit is a limit at 12% CO_2; therefore the emission rate equation can be written:

$$E = (0.1 \text{ gr/scf}) F_c (100/12)(lb/7000gr)$$

For Natural Gas: E = 0.12 lb PM/MMBTU
For Liquid Fuels: E = 0.17 lb PM/MMBTU

Based on EPA AP-42 emission factors and source test data, all natural gas fired or fuel oil fired boilers, process heaters, and turbines; and natural gas fired or diesel fired engines

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

Natural Gas Fired Units	Rule 57.B Factor = 0.12 lb PM / MMBTU	
Boiler > 100 MMBTU/Hr	3 lb/mmcf	0 00286 lb / MMBTU
Boiler 10 - 100 MMBTU/Hr	13.7 lb/mmcf	0 0131 lb / MMBTU
Boiler < 10 MMBTU/Hr	12 lb/mmcf	0 0114 lb / MMBTU
Turbine		0.0419 lb / MMBTU
Lean Burn Engine		0 046 lb / MMBTU
Rich Burn Engine		0 0007 lb / MMBTU

Fuel Oil or Diesel Fired Units	Rule 57.B Factor = 0 17 lb PM / MMBTU	
Fuel Oil Fired Boiler	2 lb / Mgal	0.014 lb / MMBTU
Fuel Oil Fired Turbine		0 061 lb/ MMBTU
Diesel Engine > 600 HP		0.062 lb/ MMBTU

Compliance with the emission limit for diesel engines < 600 HP has been shown through the conducting of a source test on an engine within Ventura County. This source test was conducted for the purpose of generating an emission factor to be used for Air Toxic "Hot Spots" emission estimations. The measured particulate concentration for this engine was 0.1 gr/dscf at 12 percent CO_2. The engine source test was a Cummins NTA engine rated at 335 horsepower at 2100 rpm The source test was conducted July 29, 1992.

m:\titlev\rule57.Bcomp

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Attachment K

List of Large Water Heaters/Small Boilers and Natural Gas-Fired Fan-Type Furnaces

18141 Beach Boulevard, Suite 200 ▪ Huntington Beach, CA 92648 ▪ 949.352.4941 Office ▪ 714.362.9085 Fax

New-Indy Oxnard, LLC
74.11.1 & 74.22 - Title V Annual Certification

Date: 2/5/22
Conducted by: Gissele Vazquez

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

	North Property Space Heaters	North Property Water Heater	Admin Water Heater	Maintenance Lunch Room Water Heater
Manufacturer	Modine Manufacturing Company	Bradford White Corporation	Rinnai Corporation	Bradford White Corporation
Brand name	Modine	Eco-Defender	Rinnai	Eco-Defender
Model number	PD 300AE0130	URG250T6N	RL94e (REU-VC2837WD-US)	URG250T6N
Heat input rating	300,000 BTU/hr	40,000 BTU/hr	199,000 BTU/hr	40,000 BTU/hr
Installation date		Nov-15	Jun-17	Oct-20
Certification status under VCAPCD Rule 74.11.1C or SCAQMD Rule 1146.2	None	Complies with jurisdictions having 10ng/J NOx Regs	Complies with SCAQMD Rule 1146.2 (<14 ng NOx/J)	Complies with jurisdictions having 10ng/J NOx Regs
Number of units	4	1	1	1
Comment	Rule 74.11.1C covers NG-fired water heaters, small boilers, steam generator or process heaters - NOT space heaters	Exempt - less than 75000 BTU/hr		Exempt - less than 75000 BTU/hr

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

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Attachment L

VCAPCD PTO No. 07141-T01

18141 Beach Boulevard, Suite 200 ▪ Huntington Beach, CA 92648 ▪ 949.352.4941 Office ▪ 714.362.9085 Fax

Ventura County
Air Pollution
Control District

4567 Telephone Rd
Ventura, California 93003

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

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

Permit to Operate 07141 - T01

Valid: 10/01/2021 to 09/30/2022

THIS PERMIT HAS BEEN ISSUED TO THE FOLLOWING:

COMPANY NAME AND ADDRESS:

C.D. Lyon Inc.
PO Box 1386
Ventura, CA 93002

FACILITY NAME AND ADDRESS:

C.D. Lyon Inc.
Portable Equipment Various Locations
Ventura County, CA 00000

EQUIPMENT DESCRIPTION:

Permission is hereby granted to operate the equipment listed at the end of this permit in Table A.

1. THIS PERMIT HAS BEEN ISSUED SUBJECT TO THE FOLLOWING PERMITTED EMISSIONS (PURSUANT TO RULE 29.B):

Permitted Emission	Tons/Year	Pounds/Hour
Reactive Organics	2.15	2.07
Particulate Matter	5.62	39.00

Note: Because of rounding, values in these tables shown as 0.00 are less than 0.005, but greater than zero.

THIS PERMIT HAS BEEN ISSUED SUBJECT TO THE FOLLOWING CONDITIONS:

2. Annual abrasive usage shall not exceed 144 tons while operating in Ventura County.

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

3. Annual usage shall not exceed 648 Gal/Yr of coatings with Maximum 3.51 Lbs/Gal ROC, as applied and 288 Gal/Yr of coatings application equipment cleanup material with Maximum 7.09 Lbs/Gal ROC, as applied, while operating in Ventura County.

   In order to comply with this condition, permittee shall maintain daily records and monthly reports of coatings, surface preparation materials, and coatings application equipment cleanup materials.

Monthly usage shall be totaled and the monthly totals summed for the previous twelve months. Material usage totals for any of these twelve (12) month periods in excess of the above limit shall be considered a violation of this condition. Prior to exceeding the above limit, permittee shall submit an application to modify this condition.

4. Pursuant to APCD Rule 74.6.B.1, the permittee shall not use any material with an ROC content in excess of 25 grams per liter of material for substrate surface preparation.
5. This permit authorizes abrasive blasting and/or painting of stationary structures and their appurtenances at their permanent sites only.
6. All coating operations shall comply with APCD Rule 74.2, "Architectural Coatings". The reactive organic compound content of flat coatings shall not exceed 50 grams per liter, computed on a minus water, minus exempt solvent basis as applied. The reactive organic compound content of nonflat coatings used shall not exceed 100 grams per liter, computed on a minus water, minus exempt solvent basis as applied. The reactive organic compound content of the industrial maintenance coatings used shall not exceed 250 grams per liter, computed on a minus water, minus exempt solvent basis as applied. Other coatings used shall meet their specific limit in the Rule 74.2 Table of Standards. Thinning of the coatings shall not cause the coatings to exceed their applicable standard.
7. All ROC containing materials, used or unused, including but not limited to surface coatings, surface preparation materials and cleanup materials shall be stored in closed containers. This condition is applied as Best Available Control Technology (BACT).
8. All abrasive blasting activities shall be conducted in conformance with all applicable provisions of Title 17, California Administrative Code, Subchapter 6 (Abrasive Blasting) and APCD Rule 74.1 (Abrasive Blasting). This includes, but is not limited to, the following permit conditions.
9. Pursuant to Rule 74.1.B.1.a, all abrasive blasting operations shall be conducted within a permanent building except when steel or iron grit/shot is used exclusively, or when the item to be blasted exceeds eight feet in any dimension, or when the surface being blasted is situated at its permanent location or no further away from its permanent location than is necessary to allow the surface to be blasted.
10. Pursuant to APCD Rule 74.1.B.1.c, when the item to be blasted exceeds eight feet in any dimension, or when the surface to be blasted is situated at its permanent location or no further away from its permanent location than is necessary to allow the surface to be blasted, the abrasive blasting operation shall be conducted using wet abrasive blasting, hydroblasting, vacuum blasting or dry blasting with certified abrasives.
11. The discharge into the atmosphere from abrasive blasting operations conducted outside a permanent building shall not be as dark or darker in shade than No. 2 on the Ringlemann Chart or of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described as Ringlemann No. 2. (Note: Ringlemann No. 2 is equivalent to 40% opacity), as required by APCD Rule 74.1.C.1.a.

12. The discharge into the atmosphere from abrasive blasting operations conducted within a permanent building shall not be as dark or darker in shade than No. 1 on the Ringlemann Chart or of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described as Ringlemann No. 1. (Note: Ringlemann No. 1 is equivalent to 20% opacity), as required by APCD Rule 74.1.C.1.b.
13. The permittee shall employ reasonable methods to insure that discharge from the abrasive blasting and/or surface coating work area does not cause a nuisance, pursuant to California Health & Safety Code Section 41700 and APCD Rule 51 (Nuisance). Such methods may include, but are not limited to, use of shrouding and covering of objects adjacent to the blasting and/or surface coating activity.
14. Pursuant to APCD Rule 74.1.B.4, only abrasives certified in accordance with Section 92350 of the California Code of Regulations shall be used for permissible outdoor blasting. Packages or containers for certified abrasives shall be legibly and permanently labeled with each of the following:
    a) The manufacturer's name or identification trade name;
    b) The grade, weight proportion of components in abrasive blends, brand name of the abrasive, or brand names and grades of components of abrasive blends; and
    c) The statement "ARB certified for permissible dry outdoor blasting."
15. The District shall be notified at least 48 hours prior to conducting abrasive blasting and/or surface coating operations by leaving a message on the District 24-hour message recorder at (805)654-2797 or by faxing a notification to (805)645-1444.

    The notification shall include the following information:

    a) Identification of operator and the Permit to Operate number (No. 7141).
    b) The location (street address and city) and a description of the abrasive blasting and/or surface coating activity.
    c) The expected starting date and duration of the abrasive blasting and/or surface coating activity.
16. The permittee shall record and maintain the following information on each abrasive blasting operation performed in Ventura County. The records shall be compiled into a monthly report. These records shall be maintained for the previous two years and shall be made available to APCD personnel upon request:
    a) The location and a description of the abrasive blasting activities.
    b) The starting and ending dates.
    c) The total hours of actual abrasive blasting activity and the amount of abrasives used.
17. The permittee shall record and maintain the following information on each surface coating operation performed in Ventura County. The records shall be compiled into a monthly report. These records

shall be maintained for the previous two years and shall be made available to APCD personnel upon request:

a) The location and a description of the surface coating activities.

b) The starting and ending dates.

c) On a daily or per site basis, record usage as follows: the brand name and product or number for each coating, solvent and thinner used; the mix ratio of the components used; the quantity of each material used; the ROC content of the coatings, as applied, computed on a minus water, minus exempt solvent basis; the coating category (e.g., coating, solvent, thinner, etc.); and the method of application.

d) On a daily or per site basis, record usage of spray equipment cleanup solvent used, which includes the following: brand and product name or number of each solvent; the quantity of each solvent used; the ROC content; and the method of application.

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

18. Portable abrasive blasting and surface coating equipment may be used anywhere in Ventura County.

19. Wipe cleaning operations shall comply with all applicable provisions of APCD Rule 74.6, "Surface Cleaning and Degreasing", including, but not limited to, the following material requirements:

    Any materials used for cleanup, including cleanup of application equipment, shall have an ROC composite partial pressure no greater than 33 mm Hg at 20 degrees Celsius and shall have an ROC content no greater than 900 grams per liter of material (Rule 74.6.B.1).

    Cleanup is defined as the removal of uncured coating, adhesive or ink from any surface, including coating application equipment, oversprayed surface, and hands. Application equipment includes but is not limited to, spray guns, rollers, and brushes.

    This condition does not apply to cleaning activities using Clean Air Solvent, or a solvent with an ROC-content no more than 25 grams per liter as applied (Rule 74.6.E.1.a).

20. Wipe cleaning operations shall comply with all applicable provisions of APCD Rule 74.6, "Surface Cleaning and Degreasing". Accordingly, no person shall perform solvent cleaning unless one of the following cleaning devices or methods is used (Rule 74.6.B.2):

    a) Wipe cleaning where solvent is dispensed to wipe cleaning materials from containers that are kept closed to prevent evaporation, except while dispensing solvent or replenishing the solvent supply;

    b) Application of solvent from a hand-held spray bottle, squirt bottle or other closed container with a capacity of one liter or less;

    c) Non-atomized solvent flow, dip or flush method where pooling is prevented or drained, and all solvent runoff is collected in a manner that enables solvent recovery or disposal. The collection

system shall be kept closed to prevent evaporation except while collecting solvent runoff or emptying the collection system.

If the cleaning method has a solvent capacity more than one gallon, a cold cleaner or remote reservoir cold cleaner meeting the equipment and operation requirements of Rule 74.6 Sections C and D shall be used.

d) A properly used enclosed gun washer or low emission spray gun cleaner.

No person shall allow liquid cleaning solvent to leak from any equipment or container (Rule 74.6.B.3).

21. All ROC-containing solvents shall be stored in non-absorbent, non-leaking containers which shall be kept closed at all times except when filling or emptying (Rule 74.6.B.4.a).

    Waste solvent and waste solvent residues shall be disposed of in a manner conforming with Division 20, Chapter 6.5 of the California Health and Safety Code (Rule 74.6.B.4.b).

22. Permittee shall maintain a current material list for at least two (2) years from the date of each record showing each ROC containing material used in solvent cleaning activities. All such records shall be made available to APCD personnel upon request (Rule 74.6.F). The records shall summarize the following information:

    a) Solvent name and manufacturer's description.

    b) All intended uses of the solvent at the facility, classified as follows:

        1) Cleanup, including application equipment cleaning, or

        2) Cleaning of electronic components, electrical apparatus components, medical devices, or aerospace components, or

        3) Solvent used pursuant to an exemption in Section E of Rule 74.6.C. (specify exemption claimed)

    c) The ROC content in units of grams of ROC per liter of material (and ROC composite partial pressure in units of mm Hg @ 20C, if applicable) of the solvent.

    d) The mix ratio, if the solvent is a mix of materials blended by the operator.

Within 30 days after receipt of this permit, the permittee may petition the Hearing Board to review any new or modified condition (Rule 22). This permit, or a copy, shall be posted reasonably close to the subject equipment and shall be accessible to inspection personnel (Rule 19). This permit is not transferrable from one location to another unless the equipment is specifically listed as being portable (Rule 20).

The granting of this Permit to Operate shall not be construed as an endorsement by the District and shall not guarantee compliance with the rules of the District. This Permit to Operate shall not be construed to allow any emission unit to operate in violation of any state or federal emission standard or any rule of the District.
This permit cannot be considered as permission to violate existing laws, ordinances, regulations or statutes of other government agencies.

For:

Ali Ghasemi, Manager
Engineering Division

Dr. Laki Tisopulos
Air Pollution Control Officer

Attachments:

- Table A - Permit Equipment List(s)

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PERMIT EQUIPMENT LIST - TABLE A

Renewal 07141 T01 / FID: 07141 C.D. Lyon Inc. / SSID: 07141

A PERMITTED EQUIPMENT

1 Abrasive Blasting Operation

2 Architectural Surface Coating Operation