



Ventura County
Air Pollution
Control District

RESPONSIBLE OFFICIAL'S CERTIFICATION FORM


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

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

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

Certification by Responsible Official

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

Signature of Responsible Official:  <small>Please use the Adobe Fill & Sign option to sign (click the 'Sign Here' flag to link to additional instructions)</small>	Date: 10/18/2023
Title of Responsible Official: Plant Manager	
Facility ID: 00214	



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION SIGNATURE COVER FORM

TV Permit # 00214

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:  Title: Plant Manager	Date: <u>10/19/2023</u>
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Time Period Covered by Compliance Certification <u>10</u> / <u>01</u> / <u>22</u> (MM/DD/YY) to <u>09</u> / <u>30</u> / <u>23</u> (MM/DD/YY)



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: 10 / 01 / 22 (MM/DD/YY) to 09 / 30 / 23 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: STRMLN214-NOx, CO, NH3</p>	<p>D. Frequency of monitoring: Annual source test, CEMS, Annual Compliance Certification</p>
<p>B. Description: Gas Turbine emission limits for NOx, CO, NH3 NOx -14.62 Tons per year, 41.44 lbs/hr, 2.0 ppm. CO - 98.42 Tons per year, 24.21 lbs/hr, 24 ppm, NH3 -12.44 Tons per year, 3.06 lbs/hr, 5.0 ppm.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable NOx EPA Mtd 20; CO ARB Mtd 100; ROC EPA Mtd 25 or 18; O2 ARB Mtd 100; NH3 BAAQMD Mtd ST-1B</p>
<p>C. Method of monitoring: Annual Source test, CEMS for NOx, CO, O2 & control system operating parameters, procedures, maintenance log, quarterly CEMS reports to District. See attached Source Test Summary Form.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>I</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>Y</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: STRMLN214-SOx</p>	<p>D. Frequency of monitoring: Annual Source Test, Annual Compliance Certification</p>
<p>B. Description: Sulfur Content of Fuels</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Only burn PUC quality natural gas is burned. Annual source testing. See attached Annual Source Testing Form</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PO0214PC1 - Condition No. 1</p>	<p>D. Frequency of monitoring: Daily Meter Readings, CEMS calculated fuel use, Monthly CEMS Reports</p>
<p>B. Description: General Record Keeping for Fuel Limits 3480.9 MMCF/yr</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Daily meter readings are incorporated into monthly production management records. CEMS calculates fuel use to date. SoCal Gas system contains historical usage in daily or monthly formats and provides 12-month historical usage of therms and CCF on each month's bills. The LM6000 consumed 54.012 MMSCF.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u> G. Compliance Status? (C or I): <u>C</u> H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



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Period Covered by Compliance Certification: 10 / 01 / 22 (MM/DD/YY) to 09 / 30 / 23 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: PO0214PC1-Condition No. 2</p>	<p>D. Frequency of monitoring: None</p>
<p>B. Description: Natural Gas Only for Gas Turbine</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Gas Turbine can only operate on Natural Gas, no other fuel is available.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PO0214PC1-Condition No.3</p>	<p>D. Frequency of monitoring: None</p>
<p>B. Description: Solvent Record Keeping</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Only aerosol solvents are used and those are purchased in containers of 1 liter or less. Pursuant to Rule 23.F.11 aerosol solvents are exempt from this permit. In addition, Conntect 5000 is used in a diluted form and the usage is tracked.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: PO0214PC1-Condition No. 4</p>	<p>D. Frequency of monitoring: Daily and monthly</p>
<p>B. Description: Emissions from the Gas Turbine Based Cogeneration Unit shall not exceed the following limits: 14.62 tons/year NOx, 98.42 tons/year CO</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: CEMS records daily emissions of both CO and NOx. Daily or 12 month totals for NOx are compared to applicable limits for compliance. The LM6000 produced 0.39 tons NOx during the certification period. The LM6000 produced 0.79 tons CO during this certification period.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>



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Period Covered by Compliance Certification: 10 / 01 / 22 (MM/DD/YY) to 09 / 30 / 23 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Rule 50</p>	<p>D. Frequency of monitoring: Annual Compliance Certification,</p> <p>Observation made on 6/2/2022</p>
<p>B. Description: Opacity</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable Per EPA Method 9</p>
<p>C. Method of monitoring: Certified observer conducted the survey. Highest opacity reading was indicated to be 0, as indicated on the Visible Emission Observation Form conducted on June 6, 2023.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 54.B.1</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Sulfur compounds in excess of 300ppm</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Compliance attained through use of PUC quality natural gas. Compliance with Rule 64 ensures compliance with this rule based on District analysis.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 54.B.2</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Sulfur content of fuel used.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Gas Turbine only uses PUC quality natural gas. Diesel fuel for emergency fire pump uses CARB Ultra Low Sulfur content fuel.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: Rule 57.1</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Combustion Contaminants – Specific – Fuel Burning Equipment</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Not required based on District analysis</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 64.B.1</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Sulfur Content of Fuels – Gaseous Fuel Requirement</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Compliance attained through use of PUC quality natural gas as the only fuel used in Gas Turbine.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 64.B.2</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Sulfur content of fuel used.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Liquid fuel is combusted only in the emergency fire pump. Invoices indicate CARB Ultra Low Sulfur Dyed Diesel is used.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>



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Period Covered by Compliance Certification: 10 / 01 / 22 (MM/DD/YY) to 09 / 30 / 23 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Rule 74.6</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Surface Cleaning and Degreasing</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: All solvents used are aerosol solvents in less than 1-liter containers and therefore are exempt from Rule 74.6(E)(1)(b). The gas turbine cleaner used is exempted by Rule 74.6(E)(3).</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 74.11.1</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Large Water Heaters and Small Boilers</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: No large water heaters or small boilers are on site.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 74.22</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Future installation of natural gas-fired, fan-type furnaces.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Applies to future installations only. No natural gas fired furnaces are on site.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u> *If yes, attach Deviation Summary Form</p>



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Period Covered by Compliance Certification: 10 / 01 / 22 (MM/DD/YY) to 09 / 30 / 23 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: Rule 74.1</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Abrasive Blasting</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Should sandblasting be necessary, routine surveillance and visual inspections during abrasive blasting operations will be performed. Records from the contractor indicating the type of abrasive used will be maintained.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 74.2</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Architectural Coatings</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Routine surveillance of application process. Purchase of compliant coating products. Maintain VOC records of coatings used.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 74.4.D</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Cutback Asphalt-Road Oils. Shall contain no more than 0.5% of organic compounds which boil at less than 500 F as determined by ASTM D402</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable ASTM D402</p>
<p>C. Method of monitoring: Request and retain certification from paving vendor whenever paving or patching work is performed on site 1.6 acre parcel.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>



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Period Covered by Compliance Certification: 10 / 01 / 22 (MM/DD/YY) to 09 / 30 / 23 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 74.9N7 Rule 74.9.D.3</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Emergency Standby Fire Pump Engine, used for fire suppression. Annual testing hours and fuel type records.</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: The Emergency Standby Engine, 121 BHP Caterpillar Diesel Fired, used for emergency fire suppression was tested weekly for 20 minutes per test run. The elapsed engine testing hours for the reporting period are 17.5 hours (October 1 – September 30). Rule allows 50 hours per year testing. CARB ultra-low sulfur diesel fuel is used by the engine.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: ATCM Engine N1</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Hours of operation for maintenance and testing of Emergency Standby Fire Pump Engine</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Weekly the Emergency Standby Fire Pump Engine is tested. The engine is operated for approximately 20 minutes during the testing. The engine is equipped with a non-resettable hour meter. The hours are logged before and after the test run and documented in the Weekly Safety Checklist. The annual engine testing hours are 17.5 hours (October 1 – September 30). The emergency fire pump engine uses CARB ultra-low sulfur content diesel fuel.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: Rule 55</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Fugitive Dust</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>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. This facility is paved with asphalt or concrete.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>



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Period Covered by Compliance Certification: 10 / 01 / 22 (MM/DD/YY) to 09 / 30 / 23 (MM/DD/YY)

<p>A. Attachment # or Permit Condition #: 40 CFR.61.M</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: National Emission Standard for Asbestos, Asbestos Demolition or Renovation</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: No demolition or renovation activities, as defined in 40 CFR Part 61.141, of asbestos containing materials occurred during the Compliance Period, therefore no inspection, notification, removal or disposal procedures, as per 40 CFR 61.145, were required.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 40 CFR Part 68, Risk Management Plans</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Lists of Regulated Substances & Thresholds for Accidental Release Prevention</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: June 21, 1999, EF Oxnard, Inc. filed an RMP with the Oxnard CUPA. The RMP contained a hazard assessment; and accidental release prevention program; an emergency response program; a 5 year accident history & a certification statement. On Dec. 27, 1999, EF Oxnard, Inc. held a public meeting to discuss the Offsite Consequence Analysis. The FBI was notified that the public meeting was held, by certified letter dated Jan. 4, 2000. The most recent RMP 5 year update was submitted on June 17, 2019 to the EPA and Oxnard CUPA, An updated RMP was submitted to the EPA and Oxnard CUPA on September 11, 2020. The current Hazardous Waste and Hazardous Materials Management Regulatory Program Permit # 02-0030 effective August 10, 2023.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 40 CFR Part 82</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Protection of Stratospheric Ozone</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: No motor vehicle repairs are done at the facility. The company trucks are serviced by authorized repair centers. No maintenance on, service of, repair of, or disposal of appliances is done at this facility.</p>	<p>F. Currently in Compliance? (Y or N): <u>Y</u></p> <p>G. Compliance Status? (C or I): <u>C</u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u>N</u></p> <p>*If yes, attach Deviation Summary Form</p>



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<p>A. Attachment # or Permit Condition #: 40 CFR Parts 72 - 78</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: Permit Shield – Acid Rain Program “Sulfur Dioxide Allowance System” “Sulfur Dioxide Opt-Ins” “Continuous Emission Monitoring”</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: Site reported to EPA delinquent emission data from Q42020 through Q12023 in April 2023. As of September 9, 2023, all initial certification tests have been completed to comply with 40CFR75. The Acid Rain Program application for the site was submitted to the Ventura County Air Pollution Control District on 08/11/2022.</p>	<p>F. Currently in Compliance? (Y or N): <u> N </u></p> <p>G. Compliance Status? (C or I): <u> I </u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u> Y </u></p> <p>*If yes, attach Deviation Summary Form</p>

<p>A. Attachment # or Permit Condition #: 40 CFR Part 63, Subpart ZZZZ</p>	<p>D. Frequency of monitoring: Annual Compliance Certification</p>
<p>B. Description: NESHAPS for Stationary Reciprocating Internal Combustion Engines (RICE MACT)</p>	<p>E. Source test reference method, if applicable. Attach Source Test Summary Form, if applicable</p>
<p>C. Method of monitoring: B By completion of the Emergency Diesel Engine Annual Reporting Form. The EF Oxnard LLC engine is a 1989 Caterpillar 3208, S/N 90N72137, BHP 121.0. Operating hour meter readings are taken each week, during the test run. The emergency fire pump diesel engine operated for 17.7 hours (October 1 – September 30). The RICE/NESHAPS Report was uploaded on March 6, 2023 to the EPA CDX CEDRI website. The local report was submitted February 14, 2023. The engine uses ultra-low sulfur diesel fuel. Fuel purchase invoices reflect this along with the quantity purchased.</p>	<p>F. Currently in Compliance? (Y or N): <u> Y </u></p> <p>G. Compliance Status? (C or I): <u> C </u></p> <p>H. *Excursions, exceedances, or other non-compliance? (Y or N): <u> N </u></p> <p>*If yes, attach Deviation Summary Form</p>



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION

SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 10 / 01 / 22 (MM/DD/YY) to 09 / 30 / 23 (MM/DD/YY)

A. Emission Unit Description: Gas Turbine GE LM6000 PC SPRINT			B. Pollutant: NOx
C. Measured Emission Rate: 1.64 ppm @15% O2	D. Limited Emission Rate: 2.0ppm @ 15%O2	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 6/6/2023

A. Emission Unit Description: Gas Turbine GE LM6000 PC SPRINT			B. Pollutant: NOx
C. Measured Emission Rate: 2.59 lb/hr	D. Limited Emission Rate: 41.44 lb/hr	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 6/6/2023

A. Emission Unit Description: Gas Turbine GE LM6000 PC SPRINT			B. Pollutant: CO
C. Measured Emission Rate: 14.83 ppm @ 15% O2	D. Limited Emission Rate: 24ppm @ 15%O2	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 6/6/2023

A. Emission Unit Description: Gas Turbine GE LM6000 PC SPRINT			B. Pollutant: CO
C. Measured Emission Rate: 14.19 lb/hr	D. Limited Emission Rate: 24.21 lb/hr	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 6/6/2023

A. Emission Unit Description: Gas Turbine GE LM6000 PC SPRINT			B. Pollutant: NH3
C. Measured Emission Rate: 1.51 ppm @ 15%O2	D. Limited Emission Rate: 5.0 ppm @ 15%O2	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 6/6/2023



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION

SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 10 / 01 / 22 (MM/DD/YY) to 09 / 30 / 23 (MM/DD/YY)

A. Emission Unit Description: Gas Turbine GE LM6000 PC SPRINT			B. Pollutant: NH3
C. Measured Emission Rate: 0.89 lb/hr	D. Limited Emission Rate: 3.06 lb/hr	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 6/6/2023

A. Emission Unit Description: Gas Turbine GE LM6000 PC SPRINT			B. Pollutant: ROC
C. Measured Emission Rate: <1.6 ppm @ 15%O2	D. Limited Emission Rate: 5.0 ppmv@15% O2 (dry)	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 6/6/2023

A. Emission Unit Description: Gas Turbine GE LM6000 PC SPRINT			B. Pollutant: ROC
C. Measured Emission Rate: <0.95 lb/hr	D. Limited Emission Rate: 1.15 lb/hr	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 6/6/2023

A. Emission Unit Description: Gas Turbine GE LM6000 PC SPRINT			B. Pollutant: Opacity
C. Measured Emission Rate: 0%	D. Limited Emission Rate: No1 Ringlemann (20%) not greater than 3 minutes in any one hour	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 6/6/2023

A. Emission Unit Description: Diesel-Fired Emergency Standby Engine, used for fire suppression			B. Pollutant: Opacity
C. Measured Emission Rate: 0%	D. Limited Emission Rate: No1 Ringlemann (20%) not greater than 3 minutes in any one hour	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 6/6/2023



Ventura County
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SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 10 / 01 / 22 (MM/DD/YY) to 09 / 30 / 23 (MM/DD/YY)

A. Emission Unit Description: Sulfur content of fuels Rule 64.B.1.			B. Pollutant: Natural Gas Total Sulfur
C. Measured Emission Rate: 1.8 PPM	D. Limited Emission Rate: 50 grains total sulfur per 100 standard cubic feet (778 PPMV)	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 6/6/2023

A. Emission Unit Description: Sulfur content of fuels for Acid Rain determination of PUC quality natural gas. 40CFR72.2 Pipeline Natural Gas definition.			B. Pollutant: Natural Gas Total Sulfur
C. Measured Emission Rate: 1.8 PPM	D. Limited Emission Rate: 0.5 grains total sulfur per 100 standard cubic feet	E. Specific Source Test or Monitoring Record Citation: Summary of Source Test Results	F. Test Date: 6/6/2023



ANNUAL COMPLIANCE CERTIFICATION

DEVIATION SUMMARY FORM

Period Covered by Compliance Certification: 10 / 01 / 22 (MM/DD/YY) to 09 / 30 / 23 (MM/DD/YY)

A. Attachment # or Permit Condition #: 40CFR72	B. Equipment description: 449.6 MMBtu/Hr (HHV) GE LM 6000 PC SPRINT NG 48 MW Gas Turbine, Serial No. 191--668, equipped with: -HRSG -STIG (Steam injection for NOx control) -SCR system with ammonia injection for NOx control -Oxidation catalyst for ROC and CO control -Continuous Emission Monitoring (CEM) system for NOx and CO	C. Deviation Period: Date & Time Begin: <u>5/25/2020</u> End: <u>Still in deviation</u> When Discovered: Date & Time <u>5/6/2022 13:30</u>
D. Parameters monitored: SO2	E. Limit: NA	F. Actual: NA
G. Probable Cause of Deviation: The interpretation of the exemptions for the site were misinterpreted resulting in later discussion with the EPA that the continuous power purchase agreement clause was not satisfied for the independent power producer exemption.		H. Corrective actions taken: Application for the Acid Rain Program was submitted to the Ventura County Air Pollution District on August 11, 2022. All certification tests have been completed and the site has completed 40CFR75 certifications for SOx, NOx and O2 monitoring.

A. Attachment # or Permit Condition #: Ventura County APCD Rule 103 Permit Conditions STRMLN214-NOx, CO, NH3 Condition 6; PO0214PC1 Condition No. 4	B. Equipment description: 449.6 MMBtu/Hr (HHV) GE LM 6000 PC SPRINT NG 48 MW Gas Turbine, Serial No. 191--668, equipped with: -HRSG -STIG (Steam injection for NOx control) -SCR system with ammonia injection for NOx control -Oxidation catalyst for ROC and CO control -Continuous Emission Monitoring (CEM) system for NOx and CO	C. Deviation Period: Date & Time Begin: <u>9/6/2023 19:00</u> End: <u>9/15/2023 14:23</u> When Discovered: Date & Time <u>9/6/2023 19:00</u>
D. Parameters monitored: NOx	E. Limit: 2.0	F. Actual: NA
G. Probable Cause of Deviation: Variation of voltages on stack NOx analyzer control boards causing inconsistent readings on CEMS/DAHS. Masked by expanded calibration acceptance limits provided in 40CFR75 Appendix B.		H. Corrective actions taken: Replaced several boards including boards damaged while troubleshooting the cause of the voltage deviations.