



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

February 11, 2025

Mr. Keith Macias
Compliance Manager
Ventura County APCD
4567 Telephone Road, Second Floor
Ventura, California 93003

Subject: RY2024 Annual Title V Compliance Certification Report

Mr. Macias:

Enclosed is The Procter & Gamble Paper Products Company's Oxnard facility, Part 70 Permit No. 00015 Compliance Certification for the January 1, 2024 through December 31, 2024 reporting period.

Please contact (805) 393-1890 or malek.s.1@pg.com should you have any questions about our facility's certification.

Thank you,

A handwritten signature in black ink, appearing to read "Sonja Malek", is written over a horizontal line.

Sonja Malek
Environmental Engineer, P&G

cc: Roshni Brahmhatt, Permits, Chief, US EPA Region 9

Rachel Buchenroth, Plant Manager, P&G
Rick West, HS&E Senior Manager, P&G



Ventura County
Air Pollution
Control District

**ANNUAL COMPLIANCE CERTIFICATION
SIGNATURE COVER FORM**

TV Permit # 00015

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

Ms. Roshni 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.

<p>Signature and Title of Responsible Official:</p> <p><i>Radeel CB</i></p> <p>Title:</p> <p><i>Plant Manager</i></p>	<p>Date:</p> <p><i>2/11/2025</i></p>
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<p>Time Period Covered by Compliance Certification</p> <p><u>01 / 01 / 24</u> (MM/DD/YY) to <u>12 / 31 / 24</u> (MM/DD/YY)</p>
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RY2024

Annual Title V Compliance

For

Procter & Gamble Paper Products Company

Oxnard, California Facility

VCAPCD PERMIT No. 00015

Contact:

**Rachel Buchenroth
Plant Manager
buchenroth.rc@pg.com**

**Sonja Malek
Environmental Engineer
(805) 393-1890
malek.s.1@pg.com**

Permit Section: 1

T.O.C

Permit Revisions Table

Permit Summary and Statement of basis. Compliance is not applicable to this summary information

Permit Section: 2

Permitted Equipment and Application Requirements Table

This is a summary of requirements

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

Compliance is not applicable to this summary information

Permit Section: 3

Permitted Throughput and Consumption Limit Table



Ventura County Air
Pollution Control
District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

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

Permit Section: 4

Permitted Emissions Table

This is a summary of requirements

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

Compliance Certification is not applicable to this summary information

Permit Section: 5

Exempt Equipment List (Insignificant Activities Table)

This is a summary of insignificant activities listed in the permit for informational purposes.

Compliance Certification is not applicable to this summary information

Permit Section: 6

Specific Applicable Requirements (Attachments)



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

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



Ventura County
Air Pollution
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ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

<p>A. Attachment # or Permit Condition #: Section 6 - 74.15 N.1</p>	<p>D. Frequency of monitoring: Biennial</p>
<p>B. Description: Boilers, Heater Treaters, Steam Generators, and Process Heaters</p> <p>Condition 1 – Emissions: NOx < 40 ppmvd, CO < 400 ppmvd</p> <p>Condition 2 – Source Tested every 24 months using ARB Method 100</p> <p>Condition 3.a-b - Alternate Fuel Use limitations</p> <p>Condition 4 – Startup emissions exemption</p> <p>Condition 5 – Recordkeeping: Alternate Fuels, Biennial Source test report</p> <p>Condition 6 – Flue Gas Recirculation requirements per Section 7</p>	<p>E. Source test reference method: Source Test Summary Form 3 of 4</p> <p>ARB Method 100: NOx CO Stack Gas O2</p>
<p>C. Method of monitoring: Condition 1 & 2 - 03/05/2024 Source Test demonstrated compliance</p> <p>Condition 3 – Only Natural Gas was used for the 2024 calendar year.</p> <p>Condition 4 – Instructional Condition; Certification not applicable.</p> <p>Condition 5 – No alternate fuel utilized. Source Test report furnished to District on time.</p> <p>Condition 6 – Compliance with applicable Section 7 flue gas recirculation requirements.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



Ventura County
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ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

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



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ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

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



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ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

<p>A. Attachment # or Permit Condition #: Section 6 – Attachment 103N5 (02/09/99)</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Boiler Capacity Factor</p> <p>Condition 1 – Operate at less than 30% Capacity Factor (CF) for CEMs exemption</p> <p>Condition 2 – Install CEMs upon request of District</p> <p>Condition 3 – Maintain monthly fuel consumption records and submit annual capacity factor calculation to demonstrate unit maintains < 30% CF each year.</p>	<p>E. Source test reference method N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1 – Babcock & Wilcox B301 boiler operated at less than 30% Capacity Factor in RY2024.</p> <p>Condition 2 – Install CEMs upon request of District</p> <p>Condition 3 – Monthly fuel records and annual capacity factor calculation are documented</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



Ventura County
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ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

<p>A. Attachment # or Permit Condition #: Section 6 – Attachment STRMLN15LM6000-NOx-rev291</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: LM6000 Gas Turbine Based Cogeneration Unit</p> <p><u>Condition 1, 2, 4, & 6</u> - NOx < 2.5 ppmvd avg. @ 15% O2 over 3 hr. period, Annual Source Test, and CEMs, ROC <2.0 ppmvd @ 15% O2 average over 3 consecutive hrs. Operate Oxidation Catalyst & test annually, Outlet Ammonia < 10 ppmvd verified annually via source test, PM < 3.08 lbs/MMscf & source test using ARB Method 5 upon District request</p> <p><u>Condition 3:</u> Emissions Exemption: 12 hr cold startup, 3 hr normal-startup, 2 hr unplanned load changes, and 1 hr shutdown</p> <p><u>Condition 5.a-f</u> - Source Test Annually at normal operating load. Test Notification and protocol submitted 15 days in advance with report submitted within 45 days of test to include permit specified parameters</p> <p><u>Condition 7.a-l & 8.a-c</u> - Operate and maintain CEMs & record permit specified data, CEMs calibration and maintenance per 40 CFR, part 51, Appendix P, Sections 3.0 through 3.9.5</p> <p><u>Condition 9</u> - Written Notification of monitored emission standards violations within 96 hours</p> <p><u>Condition 10.a-d & 11</u> - Permanent CEMs records, to include permit specified data, Upon request submit CEMs data to District</p> <p><u>Condition 12 & 13</u> - CEMs data reduced per 40 CFR, part 51, appendix P, paragraphs 5.0 – 5.3.3. Records maintained per permit conditions</p> <p><u>Condition 14.a-b</u> - Turbine Operating hours report & annual source test report</p>	<p>E. Source test reference method Source Test Summary Form 2 of 4</p> <p>EPA Method 20 -NOx ARB Method 100 -CO, O2 EPA Method 18 -ROC ASTM Method D 3588-91 - Fuel HV BAAQMD Method ST-1B-NH3</p>
<p>C. Method of monitoring:</p> <p>Condition 1, 2, 4, 5, & 6 – Annual source test conducted on January 24, 2024.</p> <p>Condition 2, 7, 10, 11, 13 – Recordkeeping maintained.</p> <p>Condition 3 – Exemptions applied as required throughout the calendar year.</p> <p>Condition 5 – Utilize certified Source Test vendors, use specified test methods, and submit documentation per deadline requirements.</p> <p>Condition 8 - Maintenance via operators with assistance from CEM manufacturer.</p> <p>Condition 9 – Operational procedures ensure compliance with 96 hour reporting requirement.</p> <p>Condition 12 – Data Acquisition System data reduction and recordkeeping per specification.</p> <p>Condition 14 – Turbine report submitted semi-annually, source test submitted annually.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



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ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

<p>A. Attachment # or Permit Condition #: Section 6 – Attachment STRMLN15LM2500-NOx,CO-rev 391</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: GE LM-2500 Gas Turbine Based Cogeneration Unit NOx and CO Applicable Requirements</p> <p>Condition 1 – 3 Hour NOx average < 2.5 ppmvd @ 15% O2 while burning Natural Gas Condition 2 – Emissions Exemption: 1 hr for startup & shutdown Condition 3 – Source Test Annually at normal operating load. Test Notification and protocol submitted 15 days in advance with report submitted within 45 days after test to include permit specified parameters. Condition 4 – Operate and maintain CEMs & record permit specified data. Condition 5 – CEMs calibration and maintenance per 40 CFR, part 51, Appendix P, Sections 3.0 through 3.9.5. Condition 6 – Written Notification of emissions violations within 96 hours. Condition 7 – Permanent CEMs records, to include permit specified data. Condition 8 – Upon request submit CEMs data to District. Condition 9 – CEMs data reduced per 40 CFR, part 51, appendix P, paragraphs 5.0 – 5.3.3. Condition 10 – Records maintained per permit conditions. Condition 11 – Turbine Operating hours report & annual source test report.</p>	<p>E. Source test reference method See Source Test Summary Form 1 of 4</p> <p>EPA Method 20 -NOx ARB Method 100 -CO, O2 ASTM Method D 3588-91 - Fuel HV</p>
<p>C. Method of monitoring:</p> <p>Condition 1, 3 – Annual source test conducted on December 11, 2024. Condition 1, 2, 4, 7, 8, 9, 10 – Recordkeeping maintained. Condition 5 – Maintenance via operators with assistance from CEMs manufacturer Condition 6 – Operational procedures ensure compliance with 96 hour reporting requirement Condition 11 – Turbine report submitted semi-annually, source test submitted annually</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



Ventura County
Air Pollution
Control District

**ANNUAL COMPLIANCE CERTIFICATION
PERMIT ATTACHMENT FORM**

Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

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



Ventura County
Air Pollution
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ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

A. Attachment # or Permit Condition #:	D. Frequency of
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Section 6 – Attachment NESHAP KK	monitoring: Monthly
<p>B. Description: 40 CFR Part 63 Subpart KK Applicable Requirements</p> <p>Condition 1 – Use < 10 Ton per 12 month rolling period of each HAP</p> <p>Condition 2 – Use < 25 tons total per 12 month rolling period for all HAPs</p> <p>Condition 3 – HAP exclusion for various activities</p> <p>Condition 4 – Considered Area Source if it complies with HAP limitations</p> <p>Condition 5 – Maintain monthly records and calculations of HAP materials and their HAP fractions</p> <p>Condition 6 – Provided 40 CFR 63.9(b) Notification</p>	E. Source test reference method N/A
<p>C. Method of monitoring: Conditions 1 – 6: In 2024, site maintained non-major HAP status by emitting less than 10 TPY of any one HAP and less than 25 TPY of all HAPs. HAP emission and mass fraction monthly records are maintained as required by permit condition.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



Ventura County
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ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

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



Ventura County
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ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

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

Permit Section: 7

Permit Specific Conditions (Attachments)



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

<p>A. Attachment # or Permit Condition #: Section 7 – Attachment PO00015PC2-rev 411, 431, 441</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Combustion Emissions Units- LM6000, LM2500, B&W Steam Boiler, 1X Hot Air, 1X Yankee Furnace, 2X Furnaces</p> <p>Condition 1 – Specifies monitoring requirements and calculations to demonstrate compliance with TPY emissions limits for Combustion Unit group identified in this condition. Condition 2 – Restricts fuel used in specified combustion units to Natural Gas (NG) Condition 3 – Maintain records: 12 mo. Rolling average fuel usage and emissions based on Emission Factors and CEM units specified in this condition and condition 1 above. Condition 4 - The Table 4 CO hourly lb./hour for the LM2500 shall be demonstrated by the annual source test requirement in STRMLIN15LM2500-NOx, CO. Condition 5 - The Table 4 CO hourly lb./hour for the LM600 shall be demonstrated by the annual source test requirement in STRMLIN15LM6000-NOx. Condition 6 - Permission to operate a rental boiler that is < 100 MMBTU/hr as an alternative to operating the 100 MMBTU/hr B-301 Boiler for up to 12 months. While in use, PO00015PC2 shall apply and PO00015PC4 shall not apply. The temporary boiler shall be equipped with Low NOx burners to meet the PO00015PC2 emissions limitations for the B-301 Boiler and shall maintain documentation that the temporary boiler meets the B-301 emission limitations and records of usage of the temporary rental boiler.</p>	<p>E. Source test reference method N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1 – Monthly monitoring of emissions records to ensure compliance with combustion emission limits. Condition 2 – Facility exclusively utilized PUC Natural Gas to fire all permitted combustion units at facility. Condition 3 - CEMS data from the turbines is used to maintain 12 month rolling averages for NOx, CO, and NH3. All other 12 month rolling averages are maintained by Emission Factors and fuel use. Condition 4 & 5 - Source Test records demonstrating the Table 4 limits for each turbine was performed and submitted per the STRMLN Requirements for each turbine. Condition 6 - Alternative Operating Scenario was not utilized in RY2024</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedance, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

A. Attachment # or Permit Condition #: Section 7 – Attachment PO00015PC3-rev351	D. Frequency of monitoring: Condition 2 - Semi Annual Condition 3 - Bi Annual
B. Description: 2X Papermachine Hot Air Furnace and “Yankee” Hood Furnace Requirements Condition 1 –Emission limitations: NOx < 0.08 lb./MMBTU, CO < 0.045 lb./MMBTU Condition 2 –Fuel and air settings locked in position as specified in permit. Settings recorded every 6 months Condition 3 – Source test the Pre Dryer Hot Air Furnace and Yankee Hot Air Furnace once every 24 months using ARB Method 100 for NOx, CO and O2. Notification & Test Protocol to District 15 days in advance. Report within 45 after test before May 26, 2022 using ARB Method 100 for NOx, CO and O2. Notification & Test Protocol to District 15 days in advance. Report within 45 after test.	E. Source test reference method: ARB Method 100: NOx CO Stack Gas O2 See Source Test Form 4 of 4
C. Method of monitoring: Condition 1 - Both Furnaces demonstrated compliance to the NOx and CO limits per their last Source Test 5/23/24 Condition 2 – Fuel Linkage settings for the Yankee and Hot Air Furnaces were monitored in March, June, August and October 2024 to meet requirement Condition 3 - Condition requirements were met as demonstrated in the most recently submitted Source Test Report.	F. Currently in Compliance? YES G. Compliance Status: CONTINUOUS H. *Excursions, exceedances, or other non-compliance: NO



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

A. Attachment # or Permit Condition #:

Section 7 – Attachment PO00015PC5-rev 441

D. Frequency of monitoring:
Monthly

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

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

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

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

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

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

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

E. Source test reference method
N/A

C. Method of monitoring:

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

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

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

F. Currently in Compliance?
YES

G. Compliance Status:
CONTINUOUS

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



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

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



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ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

A. Attachment # or Permit Condition #:

Section 7 – Attachment PO00015PC7-rev391

D. Frequency of monitoring:
Monthly

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

E. Source test reference method
N/A

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

C. Method of monitoring:

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

F. Currently in Compliance?
YES

G. Compliance Status:
CONTINUOUS

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



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ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

A. Attachment # or Permit Condition #:

Section 7 – Attachment PO00015PC8

D. Frequency of monitoring:
Monthly

B. Description: ERC Certificate No. 1166

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

E. Source test reference method
N/A

C. Method of monitoring:

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

F. Currently in Compliance?
YES

G. Compliance Status:
CONTINUOUS

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

Permit Section: 8

General Applicable Requirements (Attachments)



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

<p>A. Attachment # or Permit Condition #: Section 8 – Attachment Rule 50 (8/20/2020)</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Opacity</p> <p>Condition 1 – Do not discharge into the atmosphere any air contaminants for > 3 minutes in one hour which are as dark or darker than No. 1 on the Ringleman Chart or equal to or greater than 20% Opacity</p> <p>Condition 2 – Periodic surveillance and record of visible emissions other than uncombined water</p> <p>Condition 3 – Annual compliance certification, including site survey</p> <p>Condition 4 – Per District Request, Opacity is determined by a person certified in reading smoke using EPA Method 9 or a certified and calibrated monitoring system</p>	<p>E. Source test reference method: N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1 & 2 – No visible emissions were observed in 2024</p> <p>Condition 3 - Periodic Opacity Survey completed quarterly.</p> <p>Condition 4 - Per District request, a certified, calibrated monitoring system or a person certified in EPA Method 9 will determine Opacity</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

<p>A. Attachment # or Permit Condition #: Section 8 – Attachment 54.B.1 (01/14/14)</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Sulfur Compounds – Sulfur Emissions from Combustion Operations at Point of Discharge</p> <p>Condition 1 – Point of Discharge SO₂ concentrations < 300 ppmvd (corrected to 3% oxygen for boilers and 15% oxygen for turbines), from combustion operations specified.</p> <p>Condition 2 – Comply with fuel Sulfur content limits per Rule 64. No monitoring required.</p> <p>Condition 3 – Upon District Request determine point of Discharge concentrations of SO₂</p>	<p>E. Source test reference method: N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1 – Compliance with permit condition Attachment P00015PC2. Only PUC-quality natural gas and CARB approved diesel used on site in 2024</p> <p>Conditions 2 – Fuel Oil Sulfur Content provided by supplier at each delivery. Gaseous sulfur content meeting PUC Quality requirements. Data furnished to district upon request.</p> <p>Condition 3 – Furnish District with data upon request.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024


<p>A. Attachment # or Permit Condition #: Section 8 - Attachment 54.B.2 (01/14/14)</p>	<p>D. Frequency of monitoring: Monthly</p>
<p>B. Description: Sulfur compounds – SO2 Concentrations</p> <p>Condition 1 – Property Line SO2 concentrations: 1 hr. < 0.25 ppmvd, 24 hr. < 0.04 ppmvd</p> <p>Condition 2 - Property line 1 hour sulfur dioxide limit of 0.075 ppm</p> <p>Condition 3 – Provide fuel or exhaust analysis along with modeling data or other demonstration to District upon request</p> <p>Condition 4a-c – Upon District Request determine ground level concentrations of SO2</p>	<p>E. Source test reference method: N/A</p>
<p>C. Method of monitoring:</p> <p>Condition 1 - Compliance with permit condition Attachment P00015PC2. Only PUC-quality natural gas, and CARB approved diesel used on site in 2024</p> <p>Conditions 2 – If the District requires ambient air monitoring, test methods specified will be employed.</p> <p>Conditions 3 - Fuel Analysis provided by suppliers at request of facility. Exhaust analysis based on emissions factors incorporated into facility AB2588 Health Risk Assessment.</p> <p>Condition 4– Furnish District with data upon request.</p>	<p>F. Currently in Compliance? YES</p> <p>G. Compliance Status: CONTINUOUS</p> <p>H. *Excursions, Exceedence, or other non-compliance: NO</p>



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ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

A. Attachment # or Permit Condition #: Section 8 – Attachment 55 (06/10/08)	D. Frequency of monitoring: Monthly
B. Description: Fugitive Dust Condition 1 – Do not cause or allow fugitive dust such that is visible past the property line. Condition 2 – Do not cause or allow fugitive dust to cause 20% opacity as measured by EPA Method 9 using Rule 55 modifications. Condition 3 – Do not allow “track-out” to extend ≥25ft unless control measures are utilized Condition 4 - Remove all “track-out” at the conclusion of each workday or evening shift Condition 5 - Comply with specific activity requirements for earth moving, bulk material handling, and truck hauling activities Condition 6- Comply with specific record keeping requirements for each type of activity Condition 7 - Annually certify that all applicable source of dust are in compliance or certify that there are no operations, disturbed surface areas, or man made conditions that are subject to Rule 55.	E. Source test reference method: N/A
C. Method of monitoring: Condition 1-2– Routine activities do not result in fugitive dust causing visible emissions beyond specified boundaries. Outdoor projects are controlled and monitored such that Conditions 1-2 are met. Condition 3 – Site property is such that the possibility of track out is minimized. For projects where the possibility of track out exists – vehicles are inspected and managed to prevent track out. Condition 4 – When applicable, Track Out is removed at the conclusion of each workday or shift. Condition 5 – Site utilizes procedures and methods to prevent fugitive dust. Condition 6 – When required, records are kept. Condition 7 – Ongoing assessment of site activity to ensure Rule 55 compliance.	F. Currently in Compliance? YES G. Compliance Status: CONTINUOUS H. *Excursions, Exceedence, or other non-compliance: NO
<div style="display: flex; justify-content: space-between; align-items: center;"> <div data-bbox="61 1759 365 1858">  <p>Ventura County Air Pollution Control District</p> </div> <div data-bbox="511 1795 1380 1827" style="text-align: center;"> ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM </div> </div>	
Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024	
A. Attachment # or Permit Condition #:	D. Frequency of monitoring:

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

Monitoring:
Monthly

B. Description: Particulate Matter Emissions from Fuel Burning Equipment

Condition 1 – PM shall not exceed 0.12 lbs/Mmbtu

Condition 2 – Compliance demonstration required upon district request

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

E. Source test reference method:
N/A

C. Method of monitoring:

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

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

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

F. Currently in Compliance?
YES

G. Compliance Status:
CONTINUOUS

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



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ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

A. Attachment # or Permit Condition #:

D. Frequency of monitoring:

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

- Condition 1 – Gaseous Fuel sulfur compounds < 788 ppmvd
- Condition 2 – Periodic Monitoring not required if using PUC Natural Gas
- Condition 3 – Analyze fuel if using non-PUC quality fuel
- Condition 4a-b – Monitoring required if landfill or oilfield gaseous fuel is used

E. Source test reference method:
N/A

C. Method of monitoring:

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

F. Currently in Compliance?
YES

G. Compliance Status:
CONTINUOUS

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



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Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

A. Attachment # or Permit Condition #:

D. Frequency of monitoring:

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

Monitoring:
Monthly

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

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

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

Condition 3 – Requirements for use of non ARB liquid fuels

E. Source test reference method:
N/A

C. Method of monitoring:

Conditions 1 & 2 – Maintain records of exclusive use of ARB compliant liquid fuel used on site in 2024 – No other monitoring is required.

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

F. Currently in Compliance?
YES

G. Compliance Status:
CONTINUOUS

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



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ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

A. Attachment # or Permit Condition #:

D. Frequency of monitoring:

B. Description: Surface Cleaning and Degreasing

Condition 1.a-c: Limitations on use of solvents in surface cleaning. Solvents used for equipment cleanup and other cleanup of uncured coatings, adhesives, inks or resins and used for cleaning of electronic components shall not exceed < 900 g/l ROC & < 33 mmHg partial pressure. Cleaning solvents used for other purposes shall not exceed 25 g/l as applied.

Condition 2.a-d: If use solvents > 25 g/l ROC are used, one of the specified cleaning methods must be employed. Specified methods include wipe cleaning; non-atomized solvent flow, dip, or flush with solvent collection and solvent capacity of less than 1 liter (unless cleaning equipment stated in conditions 8-10 are used), or solvent application from hand held spray or squirt bottle with a capacity of less than one liter; or use of enclosed gun washer.

Condition 3: No liquid cleaning solvent leaks from equipment or containers.

Condition 4: No solvents shall be solicited, supplied, sold, or used that would violate Rule 74.6.

Condition 5: Use less than one gallon of halogenated solvents per week for cold cleaning. If use maintain records.

Condition 6: Solvent stored in non-absorbent containers and closed except for filling or emptying.

Condition 7: Dispose of solvents and solvent residues as specified in California Hazardous Waste Code.

Condition 8.a-f: Cold Cleaning equipment requirements, except for remote reservoir cold cleaners.

Condition 9.a-e: Remote Reservoir cold cleaner equipment requirements.

Condition 10.a-g: Cold Cleaner operating requirements.

Condition 11.a-h: Rule 74.6 exemptions

Condition 12.a-o: Condition 1 exemptions

Condition 13: Condition 1 and 2 exemptions

Condition 14.a-d: Solvent Material recordkeeping requirements. Upon district request, make information available to district personnel

Condition 15: Maintain records and perform routine surveillance of solvent cleaning activities

E. Source test reference method:
N/A

C. Method of monitoring:

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

Condition 5: Facility does not use halogenated cold cleaner solvents

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

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

Condition 14: Recordkeeping per permit requirements.

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

F. Currently in Compliance?
YES

G. Compliance Status:
CONTINUOUS

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



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Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

A. Attachment # or Permit Condition #:

D. Frequency of monitoring:

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

Monitoring:
Monthly

B. Description: Large Water Heaters and Small Boilers

E. Source test reference method:
N/A

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

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

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

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

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

C. Method of monitoring:

Conditions 1-5: Facility does not presently utilize Heaters or Boilers as specified, thus facility is not subject to equipment certification, recordkeeping, and annual survey requirements

F. Currently in Compliance?
YES

G. Compliance Status:
CONTINUOUS

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



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Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

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

Permit Section: 9-11

General Requirements for Short-Term Activities (Attachments)

General Permit Conditions

Miscellaneous Federal Program Conditions



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ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

A. Attachment # or Permit Condition #:

Section 9 – Attachment 74.1

D. Frequency of monitoring:
Monthly

B. Description: Abrasive Blasting

E. Source test reference method:
N/A

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

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

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

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

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

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

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

"

C. Method of monitoring:

F. Currently in Compliance?
YES

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

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

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

Condition 4 – No stucco or concrete blasting occurred in 2023

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

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

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

G. Compliance Status:
CONTINUOUS

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



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Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

A. Attachment # or Permit Condition #:

Section 9 – Attachment 74.2

D. Frequency of monitoring:
Monthly

B. Description: Architectural Coatings

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

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

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

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

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

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

E. Source test reference method
N/A

C. Method of monitoring:

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

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

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

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

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

F. Currently in Compliance?
YES

G. Compliance Status:
CONTINUOUS

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



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ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

A. Attachment # or Permit Condition #:

Section 9 – Attachment 74.28

D. Frequency of monitoring:
Monthly

B. Description: Asphalt Roofing Operations

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

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

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

Condition 4 – Kettle vents to remain closed at all times

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

E. Source test reference method
N/A

C. Method of monitoring:

Conditions 1-5: Internal administrative procedures. Permits and conditions of Rule 74.28 are met as applicable.

No asphalt roofing activities occurred in 2023.

F. Currently in Compliance?
YES

G. Compliance Status:
CONTINUOUS

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



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ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

A. Attachment # or Permit Condition #:

Section 9 - Attachment 40 CFR 61.M

D. Frequency of
monitoring:
Monthly

B. Description: National Emissions Standards for Asbestos

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

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

E. Source test
reference method
N/A

C. Method of monitoring:

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

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

F. Currently in
Compliance?
YES

G. Compliance Status:
CONTINUOUS

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



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ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

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



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ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

A. Attachment # or Permit Condition #:		D. Frequency of monitoring: Monthly
Section 10 – Shield -40CFR 72-78 rev 391		
B. Description: Permit Shield – Acid Rain Program		E. Source test reference method N/A
Reference Information Only		
C. Method of monitoring:		F. Currently in Compliance? YES
Not Applicable - Reference Information only		
		G. Compliance Status: CONTINUOUS
		H. *Excursions, Exceedence, or other non-compliance: NO
A. Attachment # or Permit Condition #:		D. Frequency of monitoring: Monthly
Section 10 – Shield 60KKKK		
B. Description: Permit Shield – Standards of Performance for Stationary Combustion Turbines		E. Source test reference method N/A
Reference Information Only		
C. Method of monitoring:		F. Currently in Compliance? YES
Not Applicable - Reference Information only		
		G. Compliance Status: CONTINUOUS
		H. *Excursions, Exceedence, or other non-compliance: NO
A. Attachment # or Permit Condition #:		D. Frequency of monitoring: Monthly
Section 10 – Shield 63YYYY		
B. Description: Permit Shield – NESHAP For Stationary Combustion Turbines		E. Source test reference method N/A
Reference Information Only		
C. Method of monitoring:		F. Currently in Compliance? YES
Not Applicable - Reference Information only		
		G. Compliance Status: CONTINUOUS
		H. *Excursions, Exceedence, or other non-compliance: NO



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District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

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



Ventura County Air
Pollution Control
District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

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



Ventura County Air
Pollution Control
District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

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



Ventura County Air
Pollution Control
District

ANNUAL COMPLIANCE CERTIFICATION PERMIT ATTACHMENT FORM

Period Covered by Compliance Certification: January 1, 2024 - December 31, 2024

A. Attachment # or Permit Condition #:

Section 11 – Attachment 40 CFR Part 82 (04/10/15)

D. Frequency of monitoring:
Monthly

B. Description: Protection of Stratospheric Ozone

Condition 1 – Subject to 40 CFR part 82, Subpart B if perform service on motor (fleet) vehicles

E. Source test reference method
N/A

C. Method of monitoring:

Condition 1– Facility does not maintain or otherwise service fleet vehicles at facility. Not subject to requirements specified in permit condition.

F. Currently in Compliance?
YES

Condition 2 – Internal administrative procedures to implement and manage applicable 40 CFR Part 82, Subpart F requirements.

G. Compliance Status:
CONTINUOUS

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



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

February 11, 2025

Mr. Keith Macias
Compliance Manager
Ventura County APCD
4567 Telephone Road, Second Floor
Ventura, California 93003

Subject: Additional Documents in Support of Part 70 Compliance Certification RY2024

Mr. Macias:

Enclosed are additional documents in support of The Procter & Gamble Paper Products Company's Oxnard facility, Part 70 Permit No. 00015 Compliance Certification for the January 1, 2024 through December 31, 2024 reporting period.

This submission also includes the Semi-Annual CAM Scrubber Deviation report and Turbine Operating Hours report for the period of July 30, 2024 to December 31, 2024.

If you have any questions related to this submission, please reach out to (805) 393-1890 or malek.s.1@pg.com.

Thank you,

Sonja Malek

Environmental Engineer

cc: Roshni Brahmhatt, Permits, Chief, US EPA Region 9

Rachel Buchenroth, Plant Manager, P&G

Rick West, HSE Senior Manager, P&G



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION SIGNATURE COVER FORM

TV Permit # 00015

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

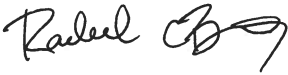
Ms. Roshni Brahmbhatt
Enforcement & Compliance Enforcement Division
EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105

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: <i>Plant Manager</i>	Date: <i>2/11/2025</i>
---	-------------------------------

Time Period Covered by Compliance Certification <u>01 / 01 / 24</u> (MM/DD/YY) to <u>12 / 31 / 24</u> (MM/DD/YY)

**Additional Documents in Support of
Part 70 Compliance Certification for
RY2024**

Deviations



ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

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

A. Attachment # or Permit Condition #: VC Rule 74.23.B.3	B. Equipment description: LM2500 aqueous ammonia forwarding pump	C. Deviation Period: Date & Time Begin: <u>02/07/2024 5:43pm</u> End: <u>02/07/2024 8:24pm</u> When Discovered: Date & Time <u>02/07/2024 5:53pm</u>
D. Parameters monitored: NOx 3-hr rolling avg @ 15% O2	E. Limit: 2.5 ppm	F. Actual: 22 ppm
G. Probable Cause of Deviation: Backup power failover to aqueous ammonia injection pump failed causing turbine to run without ammonia.		H. Corrective actions taken: Power to pump was restored and injection sequence restarted. See ENF32B Breakdown Report submitted 02/13/2024

A. Attachment # or Permit Condition #: VC Rule 74.23.B.3	B. Equipment description: LM2500 water injection valve	C. Deviation Period: Date & Time Begin: <u>04/17/2024 1:43pm</u> End: <u>04/17/2024 1:49pm</u> When Discovered: Date & Time <u>04/17/2024 1:43pm</u>
D. Parameters monitored: NOx 3-hr rolling avg @ 15% O2	E. Limit: 2.5 ppm	F. Actual: 9.35 ppm
G. Probable Cause of Deviation: During unrelated maintenance in the area, LM2500 water injection valve was shut in error.		H. Corrective actions taken: Valve was reopened and flow restored within 6 minutes. See ENF32B Breakdown Report submitted 04/23/2024

A. Attachment # or Permit Condition #: VC Rule 74.23.B.3	B. Equipment description: LM2500 ammonia flow control system	C. Deviation Period: Date & Time Begin: <u>06/12/2024 07:44am</u> End: <u>06/12/2024 07:56am</u> When Discovered: Date & Time <u>06/12/2024 4:42pm</u>
D. Parameters monitored: NOx 3-hr rolling avg @ 15% O2	E. Limit: 2.5 ppm	F. Actual: 2.79 ppm
G. Probable Cause of Deviation: CEMS Inlet NOx analyzer had drifted; during calibration adjustment, the ammonia auto control valve closed down beyond normal operating range.		H. Corrective actions taken: Ammonia control valve was placed in manual control and exceedance corrected within 12 minutes. See ENF32B Breakdown Report submitted 6/18/2024



ANNUAL COMPLIANCE CERTIFICATION DEVIATION SUMMARY FORM

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

A. Attachment # or Permit Condition #: VC Rule 74.23.B.3	B. Equipment description: LM2500 aqueous ammonia control system	C. Deviation Period: Date & Time Begin: <u>06/21/2024 1:01am</u> End: <u>06/21/2024 1:22am</u> When Discovered: Date & Time <u>06/21/2024 1:01am</u>
D. Parameters monitored: NOx 3-hr rolling avg @ 15% O2	E. Limit: 2.5 ppm	F. Actual: 4.5 ppm
G. Probable Cause of Deviation: Aqueous ammonia forwarding pump B faulted due to low supply pressure alarm, and faulted in attempting to failover to pump A, causing ammonia control valve to fail shut.		H. Corrective actions taken: Pump A was restored manually at the MCC bucket and the control valve was reopened to restore flow. See ENF32B Breakdown Report submitted 6/27/2024

A. Attachment # or Permit Condition #: VC Rule 74.23.B.3	B. Equipment description: LM2500 water injection valve	C. Deviation Period: Date & Time Begin: <u>09/14/2024 5:44pm</u> End: <u>09/14/2024 5:56pm</u> When Discovered: Date & Time <u>09/14/2024 5:44pm</u>
D. Parameters monitored: NOx 3-hr rolling avg @ 15% O2	E. Limit: 2.5 ppm	F. Actual: 10.2 ppm
G. Probable Cause of Deviation: Mechanical issue internal to LM2500 water injection causing valve to freeze at 37%, leading to a driver fault and valve failing closed.		H. Corrective actions taken: Fault was cleared and valve maintained below 37% to prevent recurring fault. Turbine was shut down on 9/18/24 to install new valve and actuator assembly. See ENF32B Breakdown Report submitted 09/21/2024

A. Attachment # or Permit Condition #: VC Rule 74.23.B.3	B. Equipment description: LM2500 aqueous ammonia forwarding pump A	C. Deviation Period: Date & Time Begin: <u>11/19/2024 7:19am</u> End: <u>11/19/2024 7:38am</u> When Discovered: Date & Time <u>11/19/2024 7:19am</u>
D. Parameters monitored: NOx 3-hr rolling avg @ 15% O2	E. Limit: 2.5 ppm	F. Actual: 5.0 ppm
G. Probable Cause of Deviation: During nonroutine work on SoCal Edison transformers, pump B power needed to be cut. Pump B was not able to failover due to fault on Pump A.		H. Corrective actions taken: Edison work was stopped and power was restored to reenable pump B while pump A failure was resolved. A spare pump was procured and installed in place of pump A on 11/21/2024. See ENF32B Breakdown Report submitted 11/26/2024

Monthly Emissions Throughput

RY2024

PO00015PC1.1 - RY 2024 Monthly Emissions

Month	Additive and Ink Applications				Combustion Emissions									
	PMKG		CVTG		Total Facility		Total Facility Combustion Emissions for all Permitted Equipment							
	ROC (tons)	ROC (tons)	ROC (tons)	ROC (tons)	ROC (tons)	ROC (tons)	NOX (tons)	PM (tons)	SOX (tons)	CO (tons)	NH3 (tons)			
Jan-24	5.74	0.11	0.11	5.86	1.08	4.81	1.34	0.14	14.75	0.69				
Feb-24	0.94	0.10	0.10	1.04	1.08	3.42	1.37	0.13	17.14	0.84				
Mar-24	1.28	0.11	0.11	1.00	1.07	2.55	1.31	0.13	18.39	0.98				
Apr-24	6.07	0.11	0.11	6.18	1.04	2.63	1.27	0.13	18.68	0.94				
May-24	1.06	0.08	0.08	1.13	1.05	3.20	1.31	0.13	19.93	0.95				
Jun-24	6.41	0.08	0.08	6.10	1.06	2.44	1.30	0.13	16.94	0.74				
Jul-24	0.45	0.10	0.10	0.54	1.08	3.06	1.34	0.14	19.40	0.64				
Aug-24	0.69	0.11	0.11	0.79	1.12	2.87	1.38	0.14	21.68	0.50				
Sep-24	0.87	0.07	0.07	0.94	1.07	2.55	1.31	0.13	22.25	0.58				
Oct-24	1.30	0.12	0.12	1.03	1.07	2.78	1.32	0.13	25.53	0.58				
Nov-24	0.82	0.11	0.11	0.93	0.85	5.80	1.11	0.11	13.31	0.90				
Dec-24	5.75	0.12	0.12	5.88	1.10	3.38	1.36	0.14	21.00	0.93				
12- Mo Tons	31.37	1.22	1.22	31.44	12.67	39.48	15.73	1.57	228.99	9.28				
				ROC	ROC	NOX	PM	SOX	CO	NH3				
				60.0	16.82	59.57	21.25	2.03	284.93	43.09				

Current Actual in Tons versus Permit Limit

*12-mo rolling combustion limit for NOx and Ammonia reduced to 59.57 tons and 43.09 tons respectively, effective January 1, 2025, per Authority to Construct #00015-490 and Temporary Permit to Operate #00015-491

Emissions Limits – Tons/Rolling 12-Month

PO00015PC2.1 - 12-Month Rolling Combustion Emissions

Limit (tons) -->	Combustion Emission Limits - Tons/Rolling 12-Month						
	ROC	NOx	PM	SOx	CO	NH3	
	16.82	132.88	21.25	2.03	284.93	54.19	
Jan-24	11.61	88.19	14.37	1.52	183.43	5.69	
Feb-24	11.68	83.20	14.47	1.53	181.59	6.05	
Mar-24	11.65	77.18	14.43	1.52	178.87	6.61	
Apr-24	11.63	71.54	14.41	1.52	177.71	7.15	
May-24	12.00	67.51	14.85	1.55	187.35	7.65	
Jun-24	11.95	61.38	14.79	1.54	188.54	8.03	
Jul-24	11.87	55.33	14.69	1.53	192.24	8.27	
Aug-24	11.83	49.64	14.65	1.53	196.52	8.28	
Sep-24	11.79	44.03	14.59	1.52	197.16	8.40	
Oct-24	12.36	41.85	15.29	1.56	217.93	8.47	
Nov-24	12.64	41.34	15.70	1.57	220.69	8.96	
Dec-24	12.67	39.48	15.73	1.57	228.99	9.28	

*12-mo rolling combustion limit for NOx and NH3 reduced to 59.57 tons and 43.09 tons respectively effective January 1, 2025 per Authority to Construct #00015-490 and Temporary Permit to Operate #00015-491

**B-301 Capacity Factor
Calculation RY2024**

PO00015, Attachment 103N - Capacity Factor, Babcock & Wilcox Boiler

B301 Monthly Fuel Throughput	
Month	Fuel Usage (MMSCF)
Jan-24	0.17
Feb-24	6.92
Mar-24	0.41
Apr-24	0.29
May-24	1.79
Jun-24	0.00
Jul-24	0.77
Aug-24	0.01
Sep-24	0.01
Oct-24	0.72
Nov-24	15.15
Dec-24	21.43
Total	47.68

Annual Heat Input (AHI):

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

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

AHI = 47.6769 * 1050

AHI = 50,061 MMBTU

Maximum Potential Heat Input (MPHI)

Rated Firing Capacity (RFC): 100 MMBTU/hr
Maximum Potential Operating Hours (MPOH): 8,784 hrs

MPHI = RFC * MPOH
MPHI = 878,400 MMBTU
30% of MPHI (Maximum Allowable): 263,520 MMBTU
Maximum Allowable Rolling 12 month Fuel Usage: 250.97 MMSCF

Capacity Factor (CF)

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

CF = AHI / MPHI
CF = 0.057 Ratio
% CF = 5.7% (%CF)

Source Test



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION

SOURCE TEST SUMMARY FORM

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

A. Emission Unit Description: LM6000 Turbine			B. Pollutant: NOx
C. Measured Emission Rate: 2.33ppm @ 15% O2	D. Limited Emission Rate: 2.5 ppm @ 15% O2	E. Specific Source Test or Monitoring Record Citation: AST-2024-0146	F. Test Date: 01/24/2024

A. Emission Unit Description: LM6000 Turbine			B. Pollutant: CO
C. Measured Emission Rate: 1.96 lb/hr	D. Limited Emission Rate: 10.20 lb/hr	E. Specific Source Test or Monitoring Record Citation: AST-2024-0146	F. Test Date: 01/24/2024

A. Emission Unit Description: LM6000 Turbine			B. Pollutant: O2
C. Measured Emission Rate: 15.02 %	D. Limited Emission Rate: N/A	E. Specific Source Test or Monitoring Record Citation: AST-2024-0146	F. Test Date: 01/24/2024

A. Emission Unit Description: LM6000 Turbine			B. Pollutant: ROC
C. Measured Emission Rate: 0.56 lb/hr	D. Limited Emission Rate: 1.21 lb/hr	E. Specific Source Test or Monitoring Record Citation: AST-2024-0146	F. Test Date: 01/24/2024

A. Emission Unit Description: LM6000 Turbine			B. Pollutant: NH3
C. Measured Emission Rate: 3.95ppm @ 15% O2	D. Limited Emission Rate: 10ppm @ 15% O2	E. Specific Source Test or Monitoring Record Citation: AST-2024-0146	F. Test Date: 01/24/24



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

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

A. Emission Unit Description: LM2500 Turbine			B. Pollutant: NOx
C. Measured Emission Rate: 1.98ppm @ 15% O2	D. Limited Emission Rate: 2.5ppm @ 15% O2	E. Specific Source Test or Monitoring Record Citation: AST-2024-4557	F. Test Date: 12/11/2024

A. Emission Unit Description: LM2500 Turbine			B. Pollutant: CO
C. Measured Emission Rate: 33.38 lb/hr	D. Limited Emission Rate: 180.13 lb/hr	E. Specific Source Test or Monitoring Record Citation: AST-2024-4557	F. Test Date: 12/11/2024

A. Emission Unit Description: LM2500 Turbine			B. Pollutant: O2
C. Measured Emission Rate: 15.20 %	D. Limited Emission Rate: N/A	E. Specific Source Test or Monitoring Record Citation: AST-2024-4557	F. Test Date: 12/11/2024

A. Emission Unit Description: LM2500 Turbine			B. Pollutant: NH3
C. Measured Emission Rate: 3.97ppm @ 15% O2	D. Limited Emission Rate: 10ppm @ 15% O2	E. Specific Source Test or Monitoring Record Citation: AST-2024-4557	F. Test Date: 12/11/2024

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:



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

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

A. Emission Unit Description: Babcock & Wilcox B-301 Boiler			B. Pollutant: NOx
C. Measured Emission Rate: 26.7ppm @ 3% O2	D. Limited Emission Rate: 40ppm @ 15% O2	E. Specific Source Test or Monitoring Record Citation: AST-2024-1237	F. Test Date: 03/05/2024

A. Emission Unit Description: Babcock & Wilcox B-301 Boiler			B. Pollutant: CO
C. Measured Emission Rate: 115ppm @ 3% O2	D. Limited Emission Rate: 400ppm @ 3% O2	E. Specific Source Test or Monitoring Record Citation: AST-2024-1237	F. Test Date: 03/05/2024

A. Emission Unit Description: Babcock & Wilcox B-301 Boiler			B. Pollutant: O2
C. Measured Emission Rate: 7.80%	D. Limited Emission Rate: N/A	E. Specific Source Test or Monitoring Record Citation: AST-2024-1237	F. Test Date: 03/05/2024

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:



Ventura County
Air Pollution
Control District

ANNUAL COMPLIANCE CERTIFICATION SOURCE TEST SUMMARY FORM

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

A. Emission Unit Description: 2X Paper Machine (Hot Air Furnace and Yankee Hood combined exhaust)			B. Pollutant: NOx
C. Measured Emission Rate: 0.073 lb/MMBtu	D. Limited Emission Rate: 0.080 lb/MMBtu	E. Specific Source Test or Monitoring Record Citation: AST-2024-1600	F. Test Date: 05/23/2024

A. Emission Unit Description: 2X Paper Machine (Hot Air Furnace and Yankee Hood combined exhaust)			B. Pollutant: CO
C. Measured Emission Rate: 0.029 lb/MMBtu	D. Limited Emission Rate: 0.045 lb/MMBtu	E. Specific Source Test or Monitoring Record Citation: AST-2024-1600	F. Test Date: 05/23/2024

A. Emission Unit Description: 2X Paper Machine (Hot Air Furnace and Yankee Hood combined exhaust)			B. Pollutant: O2
C. Measured Emission Rate: 19.66%	D. Limited Emission Rate: N/A	E. Specific Source Test or Monitoring Record Citation: AST-2024-1600	F. Test Date: 05/23/2024

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:


Emergency Diesel Engine Annual Report

**EMERGENCY DIESEL ENGINE
2024 ANNUAL REPORT FORM**

Reporting Period: January 1 through December 31, 2024

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

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

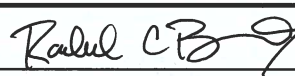
PERMIT NUMBER:#00015			
Facility Name:	The Procter & Gamble Paper Products Co.	Contact:	Sonja Malek
Facility Address:	800 N Rice Ave	Title:	Environmental Engineer
Facility City:	Oxnard	Phone:	(805) 393-1890
ENGINE DETAILS			
Engine BHp Rating: 210 BHp		Fire Pump #2 (PG#5)	
Engine Description (Manufacturer, Model, Serial Number, etc.):		Mfg: Clarke Detroit Diesel Allison, Inc Model: JU6HUF50 L1211H SN: PE6068T157094 Mfg Date: Dec 2001	
REPORTING REQUIREMENTS FOR CALENDAR YEAR 2024			
	Date of Reading		Meter Reading
First of 2024:	01/01/2024	First of 2024:	499.2
End of 2024:	01/01/2025	End of 2024:	523.6
Total annual hours for: Maintenance & Testing:			24.4
Hours of Emergency use:			0
Total Hours of operation:			24.4
Has the engine listed above exceeded the permit limit for maintenance and testing? If yes, please explain here or attach additional pages: NO			
Signature of person supplying the information: "I certify that the above information is correct."			
Signature:		Date:	02/11/2025
Print Name:	Rachel Buchenroth	Title:	Plant Manager
Phone #:	805-485-8871	Email:	buchenroth.rc@pg.com
SEND REPORT TO:			
Inspector Name:	<input type="text"/>	Email:	<input type="text"/>
Ventura County Air Pollution Control District 4567 Telephone Road, 2nd Floor, Ventura, CA 93003 or FAX: 805/456-7797			

**EMERGENCY DIESEL ENGINE
2024 ANNUAL REPORT FORM**

Reporting Period: January 1 through December 31, 2024

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

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


PERMIT NUMBER:#00015			
Facility Name:	The Procter & Gamble Paper Products Co.	Contact:	Sonja Malek
Facility Address:	800 N Rice Ave	Title:	Environmental Engineer
Facility City:	Oxnard	Phone:	(805) 393-1890
ENGINE DETAILS			
Engine BHp Rating: <input type="text" value="420"/> BHp Fire Pump #3			
Engine Description (Manufacturer, Model, Serial Number, Mfg: Catepillar etc.): Model 3406 SN 6TB10913 Mfg Date: 1983			
REPORTING REQUIREMENTS FOR CALENDAR YEAR 2024			
	Date of Reading		Meter Reading
First of 2024:	01/01/2024	First of 2024:	906.9
End of 2024:	01/01/2025	End of 2024:	906.9
Total annual hours for: Maintenance & Testing:			0
Hours of Emergency use:			0
Total Hours of operation:			0
Has the engine listed above exceeded the permit limit for maintenance and testing? If yes, please explain here or attach additional pages:			
NO			
Fire Pump #3 is out of service as of November 2023, pending repair or replacement.			
Signature of person supplying the information: "I certify that the above information is correct."			
Signature:		Date:	02/11/2025
Print Name:	Rachel Buchenroth	Title:	Plant Manager
Phone #:	805-485-8871	Email:	buchenroth.rc@pg.com
SEND REPORT TO:			
Inspector Name:	<input type="text"/>	Email:	<input type="text"/>
Ventura County Air Pollution Control District 4567 Telephone Road, 2nd Floor, Ventura, CA 93003 or FAX: 805/456-7797			

**EMERGENCY DIESEL ENGINE
2024 ANNUAL REPORT FORM**

Reporting Period: January 1 through December 31, 2024

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

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

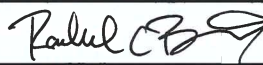
PERMIT NUMBER:#00015			
Facility Name:	The Procter & Gamble Paper Products Co.	Contact:	Sonja Malek
Facility Address:	800 N Rice Ave	Title:	Environmental Engineer
Facility City:	Oxnard	Phone:	(805) 393-1890
ENGINE DETAILS			
Engine BHp Rating: <input type="text" value="210"/> BHp Fire Pump #1 (PG#4) Engine Description (Manufacturer, Model, Serial Number, Mfg: Clarke Detroit Diesel Allison, Inc etc.): Model: JU6HUF50 SN: PE6068T185639 Mfg Date: Feb 2002			
REPORTING REQUIREMENTS FOR CALENDAR YEAR 2024			
	Date of Reading		Meter Reading
First of 2024:	01/01/2024	First of 2024:	503.8
End of 2024:	01/01/2025	End of 2024:	525.2
Total annual hours for: Maintenance & Testing:			21.4
Hours of Emergency use:			0
Total Hours of operation:			21.4
Has the engine listed above exceeded the permit limit for maintenance and testing? If yes, please explain here or attach additional pages: NO			
Signature of person supplying the information: "I certify that the above information is correct."			
Signature:		Date:	02/11/2025
Print Name:	Rachel Buchenroth	Title:	Plant Manager
Phone #:	805-485-8871	Email:	buchenroth.rc@pg.com
SEND REPORT TO:			
Inspector Name:	<input type="text"/>	Email:	<input type="text"/>
Ventura County Air Pollution Control District 4567 Telephone Road, 2nd Floor, Ventura, CA 93003 or FAX: 805/456-7797			

**EMERGENCY DIESEL ENGINE
2024 ANNUAL REPORT FORM**

Reporting Period: January 1 through December 31, 2024

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

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

PERMIT NUMBER:#00015			
Facility Name:	The Procter & Gamble Paper Products Co.	Contact:	Sonja Malek
Facility Address:	800 N Rice Ave	Title:	Environmental Engineer
Facility City:	Oxnard	Phone:	(805) 393-1890
ENGINE DETAILS			
Engine BHp Rating: <input type="text" value="420"/> BHp Fire Pump #2 Engine Description (Manufacturer, Model, Serial Number, etc.): Mfg: Caterpillar Model 3406 SN 6TB08444 Mfg Date: 1992			
REPORTING REQUIREMENTS FOR CALENDAR YEAR 2024			
	Date of Reading		Meter Reading
First of 2024:	01/01/2024	First of 2024:	876.0
End of 2024:	01/01/2025	End of 2024:	900.0
Total annual hours for: Maintenance & Testing:			24
Hours of Emergency use:			0
Total Hours of operation:			24
Has the engine listed above exceeded the permit limit for maintenance and testing? If yes, please explain here or attach additional pages: NO			
Signature of person supplying the information: "I certify that the above information is correct."			
Signature: 		Date: 02/11/2025	
Print Name: Rachel Buchenroth		Title: Plant Manager	
Phone #: 805-485-8871		Email: buchenroth.rc@pg.com	
SEND REPORT TO:			
Inspector Name: <input type="text"/>		Email: <input type="text"/>	
Ventura County Air Pollution Control District 4567 Telephone Road, 2nd Floor, Ventura, CA 93003 or FAX: 805/456-7797			

Opacity

Opacity Annual Formal Survey
Procter & Gamble Oxnard Plant

VCAPCD Part 70 Permit, Attachment 50 Compliance Document

Conducted On: 08/16/2024 Time: 09:00 AM
 Conducted By: SONJA MALEK Signature: [Signature]
 Visible Emissions Certification #: TS1018543
 Most Recent Certification Date: 07/30/2024

Permit Emission Points
Drawing - PG-3419920

Stack	Stack Hight (ft)	Stack Dia (sq ft)	Emissions Unit	Emission Description	Stack Position	Visible Emissions other than Uncombined Water N - if there are no visible emissions for 3 minutes Y - if there are visible emissions > 20% or No. 1 Ringelmann for 3 minutes
S-1	62	2.10	Washer Wet Lapper	PM	When Fan motor on	N
S-2	84	12.67	Cogen 2/LM5000 Turbine	Thermal Output with NOx, CO, SOx, PM, ROC, NH3	Damper closed when 2X is running	N
S-3	27	4.40	8-301 Steam Boiler	Thermal Output with NOx, CO, SOx, PM, ROC	FGR closed during SU (1hr) only - 100% Exhaust - otherwise partial exhaust	N
Stack S-4 is not a physical stack but represents the totals stacks from 1X process stacks 4A-4E						
S-4A	55	4.72	1X PreDryer	Thermal Output with NOx, CO, SOx, PM, ROC HAF + Burners OR Cogen + Burners	Open when 1X running	N
S-4B	-	-	Furnace Cooling	Hot Air Release from shell cooling	Open	N
S-4C	-	-	HRB	Thermal Output, NOx, CO, SOx, PM, ROC	Normally Closed	N
S-4D	50	9.63	Cogen 1/LM2500 Turbine	Thermal Output, NOx, CO, SOx, PM, ROC	Damper closed when 1X running	N
S-4E	-	-	W/WL Broke Pulper vent	PM	Open vent	N
S-5	-	-	1X Scrubber	PM	When Fan motor on	N
S-6	-	-	2X Scrubber	PM	When Fan motor on	N
Stack S-7 is not physical stack but represents the totals stacks from 2X NOTE - PreDryer Exhaust is the emission from the YHAF (after drying)						
S-7A	74	12.22	2X PreDryer Exhaust (YHAF Stack)	Thermal Output with NOx, CO, SOx, PM, ROC, NH3 LM5000 + HAF + PD	Normally Open	N
S-7B	-	-	Exhaust Divertion (PDF Stack)	Thermal Output with NOx, CO, SOx, PM, ROC, NH3	Normally Closed	N
S-7C	-	-	2X Vacuum Stack	PM	Open Vent	N
S-7D	-	-	2X Wat End (Former)	PM	Open Vent	N
S-7E	-	-	2X Broke Pulper Vent	PM	Open Vent	N
2			Fire Pump #2	CARB Fuel Combustion	Open vent	N
3			Fire Pump #3	CARB Fuel Combustion	Open vent	N
4			Fire Pump #4	CARB Fuel Combustion	Open vent	N
5			Fire Pump #5	CARB Fuel Combustion	Open vent	N

Any Other Visible Emissions? None

Scrubbers

Ventura County Air Pollution Control District

Part 70 - Semi Annual Scrubber Excursion Report

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

Report Period:	January 1, 2024 – December 31, 2024
Subject Units:	1X Paper Machine Dry End Scrubber 2X Paper Machine Dry End Scrubber

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

Excursion Details –

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

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

Semi-Annual Report
Permit to Operate No. 00015
Actual Operating Hours for
LM2500 and LM6000 Turbines
Report Period
1/1/2024 – 12/31/2024

REPORT #1 – LM-2500

Operating Hours and Source Test Results

SUMMARY REPORT

ANNUAL OPERATING HOURS AND SOURCE TEST RESULTS

Reporting Period Dates: From 1/1/24 through 12/31/24

Company: The Procter & Gamble Paper Products Company

Address: 800 North Rice Avenue, Oxnard, CA 93030

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

Certification or Audit: December 11, 2024 (Annual Source Test)

Total Source Operating Time in Reporting Period (hours): 8183.23

SOURCE TEST SUMMARY

Pollutant	Measured Emissions	Permit Limit
Oxides of Nitrogen, ppm @15% O ₂	1.98	2.5
Carbon Monoxide, lb/hr	33.38	180.13
Ammonia, ppm @ 15% O ₂	3.97	10

REPORT #2 – LM-6000

Operating Hours and Source Test Results

SUMMARY REPORT

ANNUAL OPERATING HOURS AND SOURCE TEST RESULTS

Reporting Period Dates: From 1/1/24 through 12/31/24

Company: The Procter & Gamble Paper Products Company

Address: 800 North Rice Avenue, Oxnard, CA 93030

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

Certification or Audit: January 24, 2024 (Annual Source Test)

Total Source Operating Time in Reporting Period (hours) : 8461.04

SOURCE TEST SUMMARY

Pollutant	Measured Emissions	Permit Limit
Oxides of Nitrogen, ppm @15% O ₂	2.33	2.5
Carbon Monoxide, lb/hr	1.96	10.20
Reactive Organic Compounds, ppm @15%	0.56	2.0
Ammonia, ppm @ 15% O ₂	3.95	10