

**VENTURA COUNTY  
AIR POLLUTION CONTROL DISTRICT**

669 County Square Drive  
Ventura, CA 93003  
805/645-1400

**PART 70 PERMIT**

Number 00214

Permit Term: October 1, 2018 to September 30, 2023

Company Name / Address:

E. F. Oxnard LLC  
550 Diaz Avenue  
Oxnard, CA 93030

Facility Name / Address:

E. F. Oxnard LLC  
550 Diaz Avenue  
Oxnard, CA 93030

Responsible Official:

Mr. David Nelson  
Plant Manager  
805/385-6375 ext 3

Title V Contact:

Mr. David Nelson  
Plant Manager  
805/385-6375 ext 3

The Part 70 permit consists of this page and the tables, attachments and conditions listed in the attached table of contents. The Part 70 permit application is included for reference only and is not a part of the Part 70 permit.

Pursuant to Rule 33.1, the Part 70 permit shall also serve as a permit to operate issued to fulfill the requirements of Rule 10.B.



Kerby E. Zozula, Manager  
Engineering Division

For:

Michael Villegas  
Air Pollution Control Officer

May 15, 2019

**PART 70 PERMIT NO. 00214**  
**TABLE OF CONTENTS**

1. Permit Cover Sheet
  - a. Permit Revisions Table
  - b. Permit Summary and Statement of Basis
  - c. Periodic Monitoring Summary
2. Permitted Equipment and Applicable Requirements Table
3. Permitted Throughput and Consumption Limit Table
4. Permitted Emissions Table
5. Insignificant Activities Table
6. Specific Applicable Requirements (Attachments)
  - a. Gas Turbine Based Cogeneration Unit; NO<sub>x</sub>, CO, and NH<sub>3</sub> Applicable Requirements - Streamlined (STRMLN214-NO<sub>x</sub>,CO,NH<sub>3</sub>)  
Streamlined requirements are based on the following applicable requirements:
    1. Rule 26, New Source Review
    2. Rule 74.23, Stationary Gas Turbines (74.23N4)
    3. Rule 103, Stack Monitoring (103N4)
    4. 40 CFR Part 60, Subpart KKKK, Standards of Performance for Stationary Combustion Turbines (NSPS KKKK)
  - b. Gas Turbine Based Cogeneration Unit, SO<sub>x</sub> Applicable Requirements - Streamlined (STRMLN214-SO<sub>x</sub>)  
Streamlined requirements are based on the following applicable requirements:
    1. Rule 54, Sulfur Compounds (54)
    2. Rule 64, Sulfur Content of Fuels (64)
    3. 40 CFR Part 60, Subpart KKKK, Standards of Performance for Stationary Combustion Turbines (NSPS KKKK)
  - c. Rule 74.9, Stationary Internal Combustion Engines – Emergency Engines (74.9N7)
  - d. California Air Toxic Control Measure for Stationary Compression Ignition Engines – Operating Fire Pump Assemblies (ATCM Engine N1)
  - e. 40 CFR Part 63, Subpart ZZZZ, NESHAPS for Stationary Reciprocating Internal Combustion Engines (RICE MACT) (40CFR63ZZZN3)
7. Permit Specific Conditions (Attachments)
  - a. Fuel Consumption Recordkeeping Requirements (PO00214PC1)
  - b. Natural Gas Only Combustion Requirements (PO00214PC1)
  - c. Solvent Cleaning Additional Requirements (PO00214PC1)
  - d. Annual NO<sub>x</sub> Mass Emission Limit (PO00214PC1)

Section No. 1

Table of Contents 00214-211

8. General Applicable Requirements (Attachments)

- a. Rule 50, Opacity (50)
- b. Rule 54.B.1, Sulfur Compounds - SO<sub>x</sub> at Point of Discharge (54.B.1)
- c. Rule 54.B.2, Sulfur Compounds - SO<sub>x</sub> at or Beyond Property Line (54.B.2)
- d. Rule 55, Fugitive Dust (55)
- e. Rule 57.1, Particulate Matter Emissions From Fuel Burning Equipment (57.1)
- f. Rule 64.B.1, Sulfur Content of Fuels - Gaseous Fuels (64.B.1)
- g. Rule 64.B.2, Sulfur Content of Fuels - Liquid Fuels (64.B.2)
- h. Rule 74.6, Surface Cleaning and Degreasing (74.6)
- i. Rule 74.11.1, Large Water Heaters and Small Boilers (74.11.1)
- j. Rule 74.22, Natural Gas-Fired, Fan-Type Central Furnaces (74.22)

9. General Requirements for Short-Term Activities (Attachments)

- a. Rule 74.1, Abrasive Blasting (74.1)
- b. Rule 74.2, Architectural Coatings (74.2)
- c. Rule 74.4.D, Cutback Asphalt - Road Oil (74.4.D)
- d. 40 CFR 61 Subpart M - Asbestos NESHAPS (40CFR61.M)

10. General Permit Conditions

- a. Part 70 Permit General Conditions (Part 70 General)
- b. Permit to Operate General Conditions (PO General)

11. Miscellaneous Federal Program Conditions

- a. 40 CFR Part 68 - Accidental Release Prevention and Risk Management Plans (40CFR68RMP-214)
- b. 40 CFR Part 82 - Protection of Stratospheric Ozone (40CFR82)
- c. Part 70 Permit Shield – 40 CFR Part 60, Subpart GG (SHIELD 60GG)
- d. Part 70 Permit Shield – 40 CFR Part 63, Subpart YYYYY (SHIELD 63YYYY)
- e. Part 70 Permit Shield - 40 CFR Parts 72-78 (SHIELD-40CFR72-78)

12. Part 70 Permit Application Package

Note: The Part 70 permit application is included for reference only and is not a part of the Part 70 permit.

M:\TITLE\TV Permits\PO0214\Permit \Table of Contents-211.doc

1.a. PERMIT REVISIONS TABLE

Application No.	Issue Date	Description	Revised Permit Sections
00214-ADM1	08/24/00	Administrative Amendment to revise permitted emissions to reflect the use of standard calculation methods	<ul style="list-style-type: none"> <li>•Signature Cover Page</li> <li>•Table of Contents</li> <li>•Permit Revisions Table</li> <li>•Table No. 4 (Permitted Emissions)</li> </ul>
00214-141	11/24/03	Permit Reissuance for Term: October 1, 2003 to September 30, 2008	See "Stationary Source Description"
00214-151	02/23/04	Administrative Amendment to change the name of the company from E.F. Oxnard, Inc. to E.F. Oxnard LLC	<ul style="list-style-type: none"> <li>•Signature Cover Page</li> <li>•Permit Revisions Table</li> <li>•Stationary Source Description</li> <li>•Attachment PO00214PC1</li> <li>•Attachment 40CFR68RMP-214</li> </ul>
00214-161	04/12/05	Permit Existing Emergency Engine / Minor Part 70 Permit Modification	<ul style="list-style-type: none"> <li>•Signature Cover Page</li> <li>•Table of Contents</li> <li>•Permit Revisions Table</li> <li>•Stationary Source Description</li> <li>•Periodic Monitoring Summary</li> <li>•Table No. 2</li> <li>•Table No. 3</li> <li>•Table No. 4</li> <li>•Insignificant Activities Table</li> <li>•Attachment – ATCM Emergency Fire Pump Engines</li> </ul>
00214-181	08/04/08	Administrative Amendment to Change the Responsible Official and TV Contact	<ul style="list-style-type: none"> <li>•Signature Cover Page</li> <li>•Permit Revisions Table</li> </ul>
00214-171	11/13/08	Permit Reissuance for Term Ending September 30, 2013	See "Permit Summary and Statement of Basis"

Application No.	Issue Date	Description	Revised Permit Sections
00214-191	02/01/11	Replaced Turbine / Minor Part 70 Permit Modification	<ul style="list-style-type: none"> <li>• Signature Cover Page</li> <li>• Table of Contents</li> <li>• Permit Revisions Table</li> <li>• Permit Summary And Statement of Basis</li> <li>• Periodic Monitoring Summary</li> <li>• Table No. 2</li> <li>• Table No. 3</li> <li>• Table No. 4</li> <li>• Attachment STRMLN214-NOx,CO,NH3</li> <li>• Attachment STRMLN214-SOx</li> <li>• Attachment PO00214PC1</li> <li>• Attachment SHIELD-60GG <i>replaces Attachment SHIELD-60KKKK</i></li> </ul>
00214-201	03/04/14	Permit Reissuance for Term Ending September 30, 2018	See "Permit Summary and Statement of Basis"
00214-211	03/09/17	Administrative Amendment to Change the Responsible Official and TV Contact	<ul style="list-style-type: none"> <li>•Signature Cover Page</li> <li>•Permit Revisions Table</li> </ul>
00214-221	10/23/18	Permit Reissuance for Term Ending September 30, 2023	See "Permit Summary and Statement of Basis"
00214-231	05/15/19	Administrative Amendment to Change the Responsible Official and TV Contact	<ul style="list-style-type: none"> <li>•Signature Cover Page</li> <li>•Permit Revisions Table</li> </ul>

## 1.b. PERMIT SUMMARY AND STATEMENT OF BASIS

### Stationary Source Description

This stationary source is a gas turbine-based cogeneration facility which produces electricity for sale to the power grid; and steam for use in the gas turbine and for exportation for use in the aqueous ammonia absorption refrigeration plant of a neighboring facility. This source has a Standard Industrial Classification (SIC) Code of 4931, Electric and Other Services Combined and a North American Industrial Classification System (NAICS) Code of 221112, Fossil Fuel Electric Power Generation. The source operates a cogeneration unit that consists of a GE LM-6000 PC SPRINT natural gas-fired turbine that drives a 48 MW electrical generator. This stationary source is subject to the Part 70 permit program based upon the potential to emit carbon monoxide (CO). The stationary source has held Part 70 Permit No. 00214 since October 1, 1998 and was initially permitted with the District on January 29, 1992.

As discussed in more detail throughout this Permit Summary and Statement of Basis, this permit applies to emissions units that are required to have a permit to operate pursuant to District Rule 10, "Permits Required," and District Rule 23, "Exemptions from Permit." These emissions units are listed in Table No. 2 in Section No. 2 of this permit. However, as discussed below, some equipment that is exempt from permit pursuant to District Rule 23, "Exemptions from Permit," may be subject to District rules such as District Rule 50, "Opacity." This includes "Insignificant Activities" as listed in Section No. 5 of the permit. In addition, "Short Term Activities" as listed in Section No. 9 of the permit are subject to certain rules and regulations. This permit does not regulate or restrict the use of motor vehicles and mobile equipment such as cars, trucks, bulldozers, and forklifts; however, any smoke or dust emissions generated from the use of such equipment is subject to District Rule 50, "Opacity." This permit does not shield the permittee from complying with any Federal, State, or District rule or regulation that is not specifically addressed in the permit or any rule or regulation that may come into effect during the term of the permit.

### Stationary Source Emissions

In Ventura County, the Part 70 permit thresholds are 50 tons per year for ROC and NO<sub>x</sub> and 100 tons per year for PM, SO<sub>x</sub>, and CO, pursuant to Rule 33.B.2 and Ventura County's "Serious" nonattainment classification with the federal ozone standard. Ventura County's nonattainment classification with the federal ozone standard has been in transition and is currently set at "Serious." This stationary source is subject to the Part 70 permit program based upon the carbon monoxide (CO) potential to emit. Although the CO permitted emissions as shown in Table No. 4 does not exceed the 100 tons per year threshold, the CO potential to emit does exceed the threshold when emergency use of the emergency engine is included. The purpose of Table No. 4 is to document the permitted emissions of the criteria pollutants ROC, NO<sub>x</sub>, PM, SO<sub>x</sub>, and CO for this stationary source. Permitted Emissions of ammonia are also included in Table 4 for the cogeneration unit. District Rule 29, "Conditions on Permits," requires permitted emissions to be included on each Permit to Operate. District Rule 29 requires that annual permitted emissions be based on a 12-calendar month rolling period and be expressed in units of tons per year. Hourly permitted emissions are required to be expressed in units of pounds per hour. Permitted

emissions for a stationary source are required to be determined by aggregating the permitted emissions for each emissions unit at the stationary source.

Criteria pollutant emissions (ROC, NO<sub>x</sub>, PM, SO<sub>x</sub>, and CO) result from the combustion of natural gas in the cogeneration unit and the combustion of diesel fuel in the emergency standby engine.

This stationary source is not a major source of federal Hazardous Air Pollutants (HAPs). The source is well below the HAP major source levels of 10 tons per year of a single HAP or 25 tons per year of combined HAPs. The Part 70 Permit re-issuance application includes a summary (in the units of pounds per year and pounds per hour) of pollutants that are subject to the State of California AB2588 Air Toxics "Hot Spot" Program. The goal of the Air Toxics "Hot Spots" Information and Assessment Act of 1987 (California Health and Safety Code Section 44300) is to collect air toxics emission data, to identify facilities having localized adverse health impacts, to ascertain health risks, to notify nearby workers and residents of significant risks, and to reduce significant risks if they exist. Under state law, motor vehicles (on-road and off-road) are not subject to the "Hot Spots" program. This facility has been subject to the "Hot Spots" program since it was initially permitted in 1992. Based on the quantity of toxic air contaminants released from the facility as determined by source testing, material balance calculations, and other engineering estimates, the potency and toxicity of materials released, and the proximity to sensitive receptors, this facility has been classified as "low level." As a low-level facility, the stationary source is exempt from toxics reporting requirements unless any changes are made; such as facility changes, receptor changes, or toxicity calculation changes, which would put the facility in the "intermediate" category. The most recent data submitted was for the calendar year 1995.

The United States EPA has added greenhouse gases (GHGs) to the list of regulated air pollutants. As of January 2, 2011, EPA has required that GHGs be calculated for each Title V stationary source and included in the Part 70 Permit. However, in a Federal Register notice dated August 19, 2015, EPA ruled that GHG emissions alone cannot be used to determine Title V applicability. This ruling was based on the U.S. Supreme Court decision of June 23, 2015. Greenhouse gases are defined as the aggregate group of six greenhouse gases: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons (by category), perfluorocarbons (by category), and sulfur hexafluoride. Carbon dioxide equivalent emissions (CO<sub>2e</sub>) is the amount of greenhouse gases emitted relative to the global warming potential of each pollutant.

The CO<sub>2e</sub> potential to emit for this stationary source has been calculated to be 213,417 tons per year. This potential to emit is based on the permitted annual combustion and operational (hours per year) limits listed in Table No. 3 of the permit. The District has used emission factors of 10.14 kg CO<sub>2e</sub>/gallon diesel (22.33 lb CO<sub>2e</sub>/gallon diesel) and 53.02 kg CO<sub>2e</sub>/MMBTU natural gas (116.78 lb CO<sub>2e</sub>/MMBTU natural gas) from the *Regulation for the Mandatory Reporting of Greenhouse Gas Emissions*, California Code of Regulations, title 17, Subchapter 10, Article 2, sections 95100 to 95133; Appendix A, Table 4. This CO<sub>2e</sub> potential to emit does not include insignificant activities or equipment exempt from permit pursuant to Rule 23, "Exemptions from Permit."

Major GHG-emitting sources, such as electricity generation and large stationary sources that emit more than 25,000 metric tons of carbon dioxide equivalent (MTCO<sub>2e</sub>) per year, are required to comply with the California GHG Cap-and-Trade Program and the Mandatory Reporting of Greenhouse Gas Emissions (MRR). This stationary source is subject to the program. This program is regulated and implemented by the California Air Resources Board (CARB) and not the District. The reported data can be found on CARB's website at: [https://www.arb.ca.gov/ei/tools/pollution\\_map/pollution\\_map.htm](https://www.arb.ca.gov/ei/tools/pollution_map/pollution_map.htm)

### Compliance History

Upon reissuance of this Part 70 permit, the facility was determined to be in compliance with all applicable requirements. For the time period January 1, 1996 to July 31, 2018 the facility received six (6) Notices of Violation (NOV) as detailed in the "NOV by Facility" history for Facility No. 00214 located at the end of this section of the Part 70 Permit.

### Equipment Description and Applicable Requirements - General

Applicable requirements for this stationary source are listed throughout the permit. The Table of Contents in the front of the permit summarizes the applicable requirements including the equipment specific requirements, the general applicable requirements, and the applicable requirements for short-term activities. Table No. 2 in Section No. 2 of this Permit to Operate details the applicable requirements for specific emissions units at the facility. Permit conditions that enforce these requirements are listed in Section No. 6, "Specific Applicable Requirements" and Section No. 7, "Permit Specific Conditions" of this permit.

In addition to the emission unit specific requirements in Section No. 6 and Section No. 7, there are additional general requirements that may apply to the emissions units listed in this table, or to the stationary source as a whole. Furthermore, some general requirements may apply to emissions units or short-term activities not required to be specifically listed on the permit. These general requirements are contained in the following sections of the Permit: Section No. 8, "General Applicable Requirements;" Section No. 9, "General Requirements for Short-Term Activities;" Section No. 10, "General Permit Conditions;" and Section No. 11, "Miscellaneous Federal Program Conditions." A detailed applicability discussion and additional legal basis for the permit condition(s) is included with each attachment or set of permit conditions.

### Equipment Description and Applicable Requirements - Specific

Construction on this facility was initiated in 1988 and therefore the cogeneration unit was subject to the best available control technology (BACT) requirements of Rule 26, "New Source Review." The initial GE LM-5000 turbine was replaced with a GE LM-6000 turbine in 2010 pursuant to Authority to Construct No. 00214-190 (issued January 28, 2010). The replacement turbine was also subject the BACT requirements of Rule 26. In addition, the cogeneration unit is subject to Rule 74.23, "Stationary Gas Turbines," and 40 CFR Part 60 Subpart KKKK, "Standards of Performance for Stationary Combustion Turbines." In order to comply with these requirements, the cogeneration unit is controlled by steam injection, selective catalytic reduction (SCR), and an oxidation catalyst. In addition, the facility operates a continuous emissions



monitoring system (CEMS) at the cogeneration unit that continuously monitors control system operating parameters, as well as emissions of NO<sub>x</sub> and CO from the gas turbine. The cogeneration unit is only permitted to burn natural gas.

This facility operates an emergency engine used for fire suppression that is subject to the California Air Toxic Control Measure for Stationary Compression Ignition Engines. Emergency engines installed before January 1, 2005 and used to operate fire pump assemblies are exempt from the particulate matter standards of the ATCM, but are subject to the fuel standards (CARB diesel) of the ATCM.

The emergency diesel fire pump engine is also required to comply with the operational, maintenance, and recordkeeping requirements (no emission limits) of the EPA MACT for Reciprocating Internal Combustion Engines (RICE NESHAP), 40 CFR Part 63, Subpart ZZZZ. Note that this facility is not a residential, commercial, or institutional establishment as defined in the EPA Memorandum dated August 9, 2010 “Guidance Regarding Definition of Residential, Commercial, and Institutional Emergency Stationary RICE in the NESHAP for Stationary RICE” (EPA Docket EPA-HQ-OAR-2008-0708). This EPA Memorandum states that a facility / establishment with an NAICS Code of 221112, Fossil Fuel Electric Power Generation is not a residential, commercial, or institutional establishment where the emergency diesel engine would not be subject to the RICE NESHAP. The NAICS Code is applied to the facility / establishment and is not applied to the function of the emergency diesel fire pump engine.

The emergency fire pump engine is exempt from Rule 74.9, “Stationary Internal Combustion Engines,” pursuant to the exemption of 74.9.D.3 for emergency engines. There is also a small diesel fuel tank at the facility that is exempt from permit (Rule 23.F.1) and exempt from Rule 71.2, “Storage of Reactive Organic Compound Liquids.”

The turbine-based cogeneration unit is not subject to 40 CFR, Part 60, Subpart GG, “Standards of Performance for Stationary Gas Turbines,” because it is subject to 40 CFR, Part 60, Subpart KKKK. It is subject to Subpart KKKK because the turbine replacement took place after February 18, 2005; and Subpart KKKK supersedes Subpart GG upon a modification or reconstruction after February 18, 2005. Section 60.4305(b) of Subpart KKKK states that turbines subject to Subpart KKKK are exempt from the requirements of Subpart GG.

The turbine-based cogeneration unit is not subject to 40 CFR, Part 63, Subpart YYYYY, “National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines” (Turbine MACT) because the stationary source is not a major source of HAPs (Hazardous Air Pollutants). Also, the turbine is classified in the MACT as an “existing stationary combustion turbine”; and therefore, would not be required to meet the requirements of Subpart YYYYY or Subpart A, including the initial notification requirements, even if the facility was a major source of HAPs. The permit includes a permit shield for 40 CFR Part 63, Subpart YYYYY.

The turbine-based cogeneration unit is not subject to 40 CFR, Part 64, “Compliance Assurance Monitoring” (CAM). The turbine-based cogeneration unit is not subject to CAM because it is already equipped with continuous emission monitors to comply with the NO<sub>x</sub> emission limits of Rule 26 and Rule 74.23.

Due to the storage and handling of ammonia, this facility is subject to 40 CFR Part 68, "List of Regulated Substances and Thresholds for Accidental Release Prevention." In order to comply with this federal requirement, a risk management plan has been submitted to the Oxnard Certified Unified Program Agency (Oxnard CUPA).

The turbine-based cogeneration unit is not by definition an "affected unit" under 40 CFR Part 72 Subpart A and is therefore not subject to the acid rain program requirements of 40 CFR Parts 72 through 78. In addition, this facility has a permit shield from the individual applicable requirements that have been incorporated into a combined turbine and duct burner streamline table. Therefore, demonstrating compliance with the streamlined requirements assures compliance with the individual turbine and duct burner requirements.

### Permit Revisions Summary

The Permit Revisions Table (located in Section No. 1 of the permit) is a list of all permit revisions since Part 70 Permit No. 00214 was initially issued on October 1, 1998. A portion of the permit revisions are described in further detail below. The District's Engineering Analysis for each application can also be consulted for further details.

Application No. 0214-141: Application No. 00214-141 is for the reissuance of Part 70 Permit No. 00214 for the period October 1, 2003 to September 30, 2008. The following items summarize the changes from the initial Part 70 Permit No. 00214 (October 1, 1998 to September 30, 2003):

- The Coen duct burner has been correctly identified as a John Zink duct burner. Authority to Construct No. 0214-1 for the Cogeneration System (dated October 28, 1988) identifies the duct burner as a Coen brand. The reissuance application includes an Installation and Operation Manual dated December 13, 1989 that indicates that a John Zink duct burner was installed. The burner is inside the heat recovery steam generator and does not have any type of visible nameplate. The application states that the stationary source was not aware of this discrepancy until the reissuance application was prepared.
- Permit Attachment 74.9N7 has been added to the permit to reflect the requirements of Rule 74.9, "Stationary Internal Combustion Engines", to the emergency electricity generating engine and the emergency fire water pump engine that are exempt from permit pursuant to Rule 23.D.7.
- A permit attachment detailing the applicable requirements of Rule 74.11.1, "Large Water Heaters and Small Boilers", has been added to the permit.
- The Part 68 Permit Attachment has been updated to reflect that the risk management plan has been submitted to the Oxnard CUPA.
- The following District rules have been revised and/or revisions of the rule have been adopted into the State Implementation Plan (SIP) since the initial issuance of Part 70 Permit No. 00214:
  - a) Rule 54, "Sulfur Compounds"
  - b) Rule 57, "Combustion Contaminants – Specific"

- c) Rule 64, "Sulfur Content of Fuels"
- d) Rule 68, "Carbon Monoxide"
- e) Rule 74.1, "Abrasive Blasting"
- f) Rule 74.2, "Architectural Coatings"
- g) Rule 74.6, "Surface Cleaning and Degreasing"
- h) Rule 74.23, "Stationary Gas Turbines"
- i) Rule 103, "Continuous Monitoring Systems"

Application No. 00214-171: Application No. 00214-171 is for the reissuance of Part 70 Permit No. 00214 for the period terminating on September 30, 2013. The following items summarize the changes due to this reissuance application:

- Revisions have been made to the Insignificant Activities Table
- The Rule 52 Attachment has been removed from the permit based on the April 13, 2004 revision to the rule which exempted most combustion sources from the rule.
- The Rule 68 Attachment has been removed from the permit based on the April 13, 2004 revision to the rule which exempted most combustion sources from the rule.
- An attachment for Rule 55, "Fugitive Dust" has been added to the permit.
- Permit Shields for 40 CFR Part 60, Subpart KKKK and 40 CFR Part 63, Subpart YYYY have been added to the permit.
- The following District rules have been adopted, revised and/or revisions of the rule have been adopted into the State Implementation Plan (SIP) since the October 1, 2003 to September 30, 2008 reissuance:
  - a) Rule 23, "Exemptions from Permit"
  - b) Rule 50, "Opacity"
  - c) Rule 57.1, "Particulate Matter Emissions from Fuel Burning Equipment"
  - d) Rule 74.6, "Surface Cleaning and Degreasing"
  - e) Rule 74.9, "Stationary Internal Combustion Engines"
  - f) Rule 74.29, "Soil Decontamination Operations"
  - g) California Airborne Toxic Control Measure (ATCM) For Stationary Compression Ignition Engines

Application No. 00214-191: Application No. 00214-191 is for the permitting of the replacement turbine. The GE LM-5000 turbine has been replaced by a GE LM-6000 turbine pursuant to Authority to Construct No. 00214-190 (issued January 28, 2010). The new turbine is subject to new BACT emission limits and the federal NSPS Subpart KKKK has superseded NSPS Subpart GG.

Application No. 00214-201: Application No. 00214-201 is for the reissuance of Part 70 Permit No. 00214 for the period terminating on September 30, 2018. The following items summarize the changes due to this reissuance application:

- An estimate of the Greenhouse Gas emissions (CO<sub>2e</sub>) has been included in the "Permit Summary and Statement of Basis"

- The permit attachment for the California ATCM for Stationary Compression Ignition (CI) Engines requirements has been updated to reflect the 05/19/11 revisions to the regulation.
- A permit attachment has been added to the permit for the “National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT). The RICE MACT is applicable to the emergency diesel engine.
- The permit shield attachment for the Acid Rain Program has been corrected. It referenced the previous turbine at the facility.
- The following District rules have been adopted, revised and/or revisions of the rule have been adopted into the State Implementation Plan (SIP) since the last issued permit:
  - a) Rule 74.2, “Architectural Coatings”
  - b) Rule 74.11.1, “Large Water Heaters and Small Boilers”

Application No. 00214-211: Application No. 00214-211 is for an Administrative Amendment to replace a Responsible Official and Title V contact.

Application No. 00214-221: Application No. 00214-221 is for the reissuance of Part 70 Permit No. 00214 for the five-year term ending September 30, 2023. The following items summarize the changes due to this reissuance application:

- The permit attachment STRMLN214-SO<sub>x</sub> was updated to reflect the most recent Rule 54 being adopted into the State Implementation Plan. In addition, the latest changes of Rule 54.B.1 were reflected in Condition No. 4, and in the “emission limit” in the corresponding table.
- The permit attachment 40CFR63ZZZN3 was updated to include a RICE NESHAP standards EPA weblink. In addition, Condition Nos. 5.c, 7, and 8 were updated to remove older date references that no longer apply in this permit reissuance.
- The permit attachment 54.B.1 was updated to reflect the new requirements in Rule 54.B.1.a.
- The following rules and regulations attachments have been revised to clarify the applicability and / or periodic monitoring requirements:
  - a) Rule 50, “Opacity”
  - b) Rule 74.1, “Abrasive Blasting”
  - c) Rule 74.2, “Architectural Coatings”
  - d) Rule 74.6, “Surface Cleaning and Degreasing”
  - e) 40 CFR Part 82, “Protection of Stratospheric Ozone”
- The following District rules have been adopted, revised and/or revisions of the rule have been adopted into the State Implementation Plan (SIP) since the last permit reissuance:
  - a) Rule 54, “Sulfur Compounds”

# NOV by Facility

Since January 1, 1996

Facility selected  
00214

Facility No      00214      E.F. Oxnard LLC

NOV Date	NOV No	Rule Number	Comment	Settlement	Date Closed
08/17/1999	018943	29.C	Permit Condition Not Met - Gas Turbine NOx Emissions	\$500.00	11/02/1999
12/09/1999	019216	33.9.C	Failure To Submit Report - Annual Compliance Certification	\$1,000.00	02/23/2000
09/18/2001	019530	29.C	Permit Condition Not Met - Gas Turbine NOx Emissions	\$1,000.00	11/05/2001
01/16/2002	019537	74.23.B.2.a	Failure to Record NOx Emissions - Gas Turbine	\$1,000.00	02/26/2002
08/02/2011	022630	29.C	Permit Condition Not Met- NOx emission - Gas Turbine AFS Key 00093	\$5,000.00	09/06/2011
06/12/2012	021179	29.C	Permit Condition Not Met - Turbine	\$5,000.00	07/19/2012
<b>Total for 6 NOVs</b>				<b>\$13,500.00</b>	

## 1.c. PERIODIC MONITORING SUMMARY

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

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

### 1.c.1. Specific Applicable Requirements

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
STRMLN214- NOx, CO, NH3	Rules 26, 74.23 B.1, 74.23 B.2, 103-A.4, 40 CFR Part 51 App B, 40 CFR Part 60 Subpart KKKK	<ul style="list-style-type: none"> <li>• Annual Source Test (NOx, CO, ROC, O2, NH<sub>3</sub>, fuel HHV)</li> <li>• Submit test results w/in 45 days of conducting tests</li> <li>• CEMs for fuel consumption, NOx, CO, O<sub>2</sub>, and control system operating parameters</li> <li>• Report each CEM emission violation w/in 96 hours</li> <li>• Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>• Records of CEMs data</li> <li>• Records of maintenance operations, periodic inspections, and repairs</li> <li>• Records of source test reports and any violations or limit exceedances</li> </ul>	<ul style="list-style-type: none"> <li>• Actual annual operating hours or fuel consumption</li> <li>• Annual source test with control system operating parameters</li> <li>• 30-day rolling NOx concentration average</li> </ul>	<ul style="list-style-type: none"> <li>• NO<sub>x</sub>-EPA Method 20</li> <li>• CO - ARB Method 100</li> <li>• ROC - EPA Method 25 or 18</li> <li>• O<sub>2</sub> - ARB Method 100</li> <li>• NH<sub>3</sub> - BAAQMD Method ST-1B (1/20/82)</li> <li>• Gaseous fuel HHV - ASTM Method D1826-88</li> </ul>	Streamlined Requirements
STRMLN214-SOX	Rules 54 and 64, 40 CFR Part 60 Subpart KKKK	<ul style="list-style-type: none"> <li>• Annual compliance certification</li> <li>• None for PUC-quality gas</li> <li>• Annual test for non PUC-quality gas (submit with annual compliance certification)</li> <li>• Upon request, source test for sulfur compounds at point of discharge</li> </ul>	<ul style="list-style-type: none"> <li>• Annual fuel gas analysis for non PUC-quality gas</li> </ul>	None	<ul style="list-style-type: none"> <li>• SCAQMD Method 307-94</li> <li>• Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD Method 307-94, as appropriate</li> </ul>	Permitted to burn natural gas only

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
74.9N7	Rule 74.9.D.3	<ul style="list-style-type: none"> <li>•Annual compliance certification</li> <li>•Hours of operation</li> </ul>	<ul style="list-style-type: none"> <li>•Operating hours</li> <li>•Date, time, duration, reason for operation</li> <li>•Engine data</li> </ul>	None	None	
ATCM Engine N1	ATCM for Stationary Compression Ignition Engines	<ul style="list-style-type: none"> <li>•Hours of operation records for maintenance and testing</li> <li>•Fuel type records</li> </ul>	<ul style="list-style-type: none"> <li>•Hours of operation for maintenance and testing</li> <li>•Fuel type records</li> </ul>	None	None	Not Federally- Enforceable
40CFR63ZZZZ3	RICE MACT for emergency diesel engines – oil change and inspections	<ul style="list-style-type: none"> <li>•Maintenance records</li> <li>•Use non-resettable hour meter</li> <li>•Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>•Maintenance records</li> <li>•Hours of operation records</li> </ul>	None	None	

### 1.c.2. Permit-Specific Conditions

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
PO0214PC1 - Condition No. 1	Rules 26 and 29 General Recordkeeping	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Monthly records of throughput and consumption</li> </ul>	<ul style="list-style-type: none"> <li>Monthly records</li> </ul>	None	None	
PO0214PC1 - Condition No. 2	Rule 26 Natural Gas Only	<ul style="list-style-type: none"> <li>Annual compliance certification</li> </ul>	None	None	None	
PO0214PC1 - Condition No.3	Rule 29 Exempt Solvents	<ul style="list-style-type: none"> <li>Maintain a list of solvents in use and permit exemption status data</li> </ul>	None	None	None	
PO0214PC1 - Condition No.4	Rule 26 Cogeneration Unit Annual NO <sub>x</sub> Limit	<ul style="list-style-type: none"> <li>CEMs (NO<sub>x</sub>)</li> <li>Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>Monthly and rolling twelve-month records of NO<sub>x</sub> emissions</li> </ul>	None	None	



### 1.c.3. General Applicable Requirements

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

Attachment No./Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
50	Rule 50	<ul style="list-style-type: none"> <li>• Routine surveillance</li> <li>• Visual inspections</li> <li>• Annual compliance certification, including a formal survey</li> <li>• Opacity readings upon request</li> <li>• Notification required for uncorrectable visible emissions</li> </ul>	<ul style="list-style-type: none"> <li>• All occurrences of visible emissions for periods &gt; 3 min in any one hour</li> <li>• Annual formal survey of all emissions units</li> </ul>	None	<ul style="list-style-type: none"> <li>• Opacity - EPA Method 9</li> </ul>	
54.B.1	Rule 54.B.1	<ul style="list-style-type: none"> <li>• Annual compliance certification</li> <li>• Follow monitoring requirements under Rule 64</li> <li>• Upon request, source test for sulfur compounds at point of discharge</li> </ul>	None	None	<ul style="list-style-type: none"> <li>• Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD Method 307-94, as appropriate</li> </ul>	<ul style="list-style-type: none"> <li>• Compliance with Rule 64 ensures compliance with this rule based on District analysis</li> </ul>
54.B.2	Rule 54.B.2	<ul style="list-style-type: none"> <li>• Annual compliance certification</li> <li>• Determine ground or sea level concentrations of SO<sub>2</sub>, upon request</li> </ul>	<ul style="list-style-type: none"> <li>• Representative fuel analysis or exhaust analysis and compliance demonstration</li> </ul>	None	<ul style="list-style-type: none"> <li>• SO<sub>2</sub> - BAAQMD Manual of Procedures, Vol. VI, Section 1, Ground Level Monitoring for H<sub>2</sub>S and SO<sub>2</sub></li> </ul>	
55	Rule 55	<ul style="list-style-type: none"> <li>• Annual compliance certification</li> </ul>	<ul style="list-style-type: none"> <li>• Specific activity records as applicable</li> </ul>	None	<ul style="list-style-type: none"> <li>• EPA Method 9</li> </ul>	
57.1	Rule 57.1	<ul style="list-style-type: none"> <li>• Annual compliance certification</li> </ul>	None	None	None	<ul style="list-style-type: none"> <li>• Not required based on District analysis</li> </ul>
64.B.1	Rule 64.B.1	<ul style="list-style-type: none"> <li>• Annual compliance certification</li> <li>• None for PUC-quality gas</li> <li>• Annual test for non PUC-quality gas (submit with annual compliance certification)</li> </ul>	<ul style="list-style-type: none"> <li>• Annual fuel gas analysis for non PUC-quality gas</li> </ul>	None	<ul style="list-style-type: none"> <li>• SCAQMD Method 307-94</li> </ul>	
64.B.2	Rule 64.B.2	<ul style="list-style-type: none"> <li>• Annual compliance certification</li> <li>• Fuel supplier's certification, or fuel test per each delivery (submit with annual compliance certification)</li> </ul>	<ul style="list-style-type: none"> <li>• Fuel supplier's certification, or fuel test per each delivery</li> </ul>	None	<ul style="list-style-type: none"> <li>• ASTM Method D4294-83 or D2622-87</li> </ul>	

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
74.6	Rule 74.6	<ul style="list-style-type: none"> <li>•Annual compliance certification</li> <li>•Maintain current solvent information</li> <li>•Routine surveillance of solvent cleaning activities</li> <li>•Upon request, solvent testing</li> </ul>	<ul style="list-style-type: none"> <li>•Records of current solvent information</li> </ul>	None	<ul style="list-style-type: none"> <li>•ROC content-EPA Test Method 24 or 24A</li> <li>•Identity of solvent components-ASTM E168-67, ASTM E169-87, or ASTM E260-85</li> <li>•True vapor pressure or composite partial pressure -ASTM D2879-86</li> <li>•Initial boiling point-ASTM 1078-78 or published source</li> <li>•Spray gun active/passive solvent losses-SCAQMD Method (10-3-89)</li> </ul>	
74.11.1	Rule 74.11.1	<ul style="list-style-type: none"> <li>•Annual compliance certification</li> <li>•Maintain identification records of large water heaters and small boilers</li> </ul>	<ul style="list-style-type: none"> <li>•Records of current information of large water heaters and small boilers</li> </ul>	None	None	<ul style="list-style-type: none"> <li>•Rule only applies to the installation of large water heaters and small boilers</li> </ul>
74.22	Rule 74.22	<ul style="list-style-type: none"> <li>•Annual compliance certification</li> <li>•Maintain furnace identification records</li> </ul>	<ul style="list-style-type: none"> <li>•Records of current furnace information</li> </ul>	None	None	<ul style="list-style-type: none"> <li>•Rule only applies to future installation of natural gas-fired, fan-type furnaces</li> </ul>

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

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

Attachment No./Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
74.1	Rule 74.1	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Routine surveillance and visual inspections of abrasive blasting operation</li> <li>Abrasive blasting records</li> </ul>	<ul style="list-style-type: none"> <li>Abrasive blasting records</li> </ul>	None	<ul style="list-style-type: none"> <li>Visible emission evaluation-Section 92400 of CCR</li> </ul>	
74.2	Rule 74.2	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Routine surveillance</li> <li>Maintain VOC records of coatings used</li> </ul>	<ul style="list-style-type: none"> <li>Maintain VOC records of coatings used</li> </ul>	None	<ul style="list-style-type: none"> <li>VOC content-EPA Method 24, CARB Method 432</li> <li>Acid content-ASTM Method D 1613-85,</li> <li>Metal content-SCAQMD Method 311-91</li> </ul>	
74.4.D	Rule 74.4.D	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>Test ROC content of oil sample being proposed for usage</li> </ul>	<ul style="list-style-type: none"> <li>Records of oil analyses</li> </ul>	None	<ul style="list-style-type: none"> <li>ASTM D402</li> </ul>	
40CFR.61.M	40 CFR Part 61, Subpart M	<ul style="list-style-type: none"> <li>Annual compliance certification</li> <li>See 40 CFR Part 61.145 for inspection procedures</li> </ul>	<ul style="list-style-type: none"> <li>See 40 CFR Part 61.145 for recordkeeping procedures</li> </ul>	<ul style="list-style-type: none"> <li>See 40 CFR Part 61.145 for notification procedures</li> </ul>	<ul style="list-style-type: none"> <li>See 40 CFR Part 61.145 for test methods</li> </ul>	

M:\TITLE\TV Permits\PO0214\Permit IV\PerdcTbl-rev201.doc

## 2. PERMITTED EQUIPMENT AND APPLICABLE REQUIREMENTS TABLE

### Purpose

The purpose of this table is to list the emissions units at this stationary source that are permitted to operate pursuant to Rule 10, "Permits Required" and Rule 23, "Exemptions from Permit." The table also provides a list of requirements that are specifically applicable to these emissions units. Permit conditions that enforce these requirements are listed in Section No. 6, "Specific Applicable Requirements" and Section No. 7, "Permit Specific Conditions" of this permit.

In addition to the emission unit specific requirements in Section No. 6 and Section No. 7, there are additional general requirements that may apply to the emissions units listed in this table, or to the stationary source as a whole. Furthermore, some general requirements may apply to emissions units or short-term activities not required to be specifically listed on the permit. These general requirements are contained in the following sections of the Permit: Section No. 8, "General Applicable Requirements"; Section No. 9, "General Requirements for Short-Term Activities"; Section No. 10, "General Permit Conditions"; and Section No. 11, "Miscellaneous Federal Program Conditions."

### Equipment Description

This portion of the table provides a brief description of the permitted equipment at this stationary source. Attached to the table is a "Title V Equipment List Description Key" that contains definitions and explanations for some of the standard terminology used in the equipment description.

### Applicable Requirements

The applicable requirements portion of the table is a matrix of applicability for the specific requirements that apply to the listed emissions units. The columns are labeled with APCD rule numbers or references to federal requirements. An "X" in the row corresponding to the emissions unit indicates the requirement is specifically applicable to that unit. For cases where a rule has multiple compliance options, a number appears instead of an "X." The number is a code key that corresponds to the "Title V Applicable Requirement Code Key" attached to the table. The code key table contains specific citations for the portions of the rule that are applicable. The code key is also used to identify the permit attachment in Section No. 6, "Specific Applicable Requirements," that contains the associated permit conditions. For example, code key "3" under Rule 74.9 indicates that the emission unit is required to comply with the requirements of Attachment 74.9N3 in Section No. 6.

Permit specific conditions are identified with a "PC" followed by a number in the column labeled "ADD REQ" (additional requirements). A "PC#" in the row corresponding to the emissions unit indicates that the permit specific condition is specifically applicable to that unit. For the purpose

of the Annual Compliance Certification, the owner or operator can identify the conditions that apply within the "PC#." The "PC#" also corresponds to the permit attachment in Section No. 7, "Permit Specific Conditions," that contains the permit specific requirements.

M:\TITLEV\Attachments updated\PERMIT2std.docx

## TITLE V EQUIPMENT LIST DESCRIPTION KEY

The Permitted Equipment and Applicable Requirements Table and this Title V permit contain a number of terms, abbreviations, and acronyms that have been standardized. The following list describes and defines many of the terms in this permit:

APCD	Air Pollution Control District
APCO	Air Pollution Control Officer of the Ventura County APCD
ARB	The California Air Resources Board
ASTM	American Standards for Testing Materials
BACT	Best Available Control Technology
BHP	The rating of an internal combustion engine as measured in brake horsepower
CARB	California Air Resources Board
CFH	Cubic feet per hour
CFM	Cubic feet per minute
CFR	Code of Federal Regulations
CO	Carbon Monoxide
EPA	Environmental Protection Agency
FGR	Flue gas recirculation
FO	Fuel oil or diesel fuel
Gal	Gallon
HAP	Hazardous Air Pollutant
HHV	Higher Heating Value of a fuel
Lb ROC/Gal	Pound(s) of ROC per gallon
Lo-NOx	Device has equipment to control the emissions of NOx
LPG	Liquid petroleum gas
MMBTU/Hr	The heat input of a combustion device as measured in millions of British Thermal Units per hour

MW	The electrical output of a steam turbine or gas turbine, as measured in megawatts
NESHAPS	National Emission Standards for Hazardous Air Pollutants
NG	Indicates that the equipment is permitted to be fired on natural gas only
NH <sub>3</sub>	Ammonia
NO <sub>x</sub>	Oxides of Nitrogen
NSCR	Engine that is equipped with non-selective catalytic reduction to meet its Rule 74.9 compliance requirements.
NSPS	New Source Performance Standards
PM	Particulate Matter
PSC	Engine that is equipped with a pre-stratified charge to meet its Rule 74.9 compliance requirements.
Rich or Lean Burn	A designation associated with a gas-fired internal combustion engine that determines its Rule 74.9 compliance requirements.
ROC	Reactive Organic Compound
SCAQMD	South Coast Air Quality Management District
SCFM	Standard cubic feet per minute
SCR	Engine or turbine that is equipped with selective catalytic reduction and ammonia injection for the control of NO <sub>x</sub> to meet its Rule 74.9 or Rule 74.23 compliance requirements.
SIP	State Implementation Plan
SO <sub>x</sub>	Sulfur Oxides
STIG	Steam injection in a gas turbine used for the control of NO <sub>x</sub>
1,1,1-TCA	Trichloroethane
TV AF	Title V application form
VOC	Volatile Organic Compound
VR	Vapor recovery system that is installed on a tank or other piece of process equipment

M:\TITLEV\TV Permits\PO0214\Permit V\Glossary.docx

TABLE NO. 2

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT									
Permit to Operate No. 00214									
Permitted Equipment and Applicable Requirements									
Equipment	54	64	74.23	103	NSPS KKKK	74.9	ATCM Stationary CI Engines	RICE MACT	Additional Requirements
Cogeneration Unit Including: 1 - 449.6 MMBtu/Hr (HHV) GE LM 6000 PC SPRINT NG 48 MW Gas Turbine, Serial No. 191-668, equipped with: -HRSG (Steam is exported to adjacent refrigeration plant) -STIG (Steam injection for NOx control) -Haldor Topsoe SCR system with aqueous ammonia injection for NOx control -EmeraChem oxidation catalyst for ROC and CO control -Continuous Emission Monitoring (CEM) system for NOx and CO	X	X	4	4	X				PCI
1 - 121 BHP Caterpillar Diesel-Fired Emergency Standby Engine, Model 3208, Serial No. 90N72137, used for fire suppression						7	X	3	

M:\TITLE\TV Permits\PO0214\PERMIT V\Tables\_0214\_rev221



PART 70 PERMIT No. 00214  
TITLE V APPLICABLE REQUIREMENT CODE KEY

Rule 74.9, "Stationary Internal Combustion Engines"

1. Pre-January 1, 2002 emission limits and post-January 1, 2002 emission limits for natural gas rich burn engines with existing emission controls installed after September 5, 1989. (74.9.B.1 or 74.9.B.2, and 74.9.B.3)
2. Pre-January 1, 2002 emission limits and post-January 1, 2002 emission limits for natural gas lean burn engines with existing emission controls installed after September 5, 1989. (74.9.B.1 or 74.9.B.2, and 74.9.B.3)
3. Post-January 1, 1997 emission limits for natural gas rich burn engines with emission controls installed before September 5, 1989; or installed after March 5, 1992. (74.9.B.1 or 74.9.B.2)
4. Post-January 1, 1997 emission limits for natural gas lean burn engines with emission controls installed before September 5, 1989; or installed after March 5, 1992. (74.9.B.1 or 74.9.B.2) Post-January 1, 1997 emission limit for ammonia, if applicable. (74.9.B.5)
5. Post-January 1, 1997 emission limits for diesel engines. (74.9.B.1 or 74.9.B.2) Post-January 1, 1997 emission limit for ammonia, if applicable. (74.9.B.5)
6. Exemption from Rule 74.9 for engines operated less than 200 hours per calendar year (74.9.D.2)
7. Exemption from Rule 74.9 for emergency standby engines operated during either an emergency or maintenance operation. (74.9.D.3)
8. Exemption from Rule 74.9 for diesel engines with a permitted capacity factor of less than or equal to 15%. (74.9.D.8)
9. Exemption from Rule 74.9 for diesel engines used to power cranes and welding equipment. (74.9.D.9)
10. Exemption from Rule 74.9 for diesel engines operated on San Nicolas Island. (74.9.D.10)

Rule 74.23, "Stationary Gas Turbines"

1. NO<sub>x</sub> and NH<sub>3</sub> emission limit for turbines rated at 0.3 MW to less than 2.9 MW (74.23.B.1 and 74.23.B.4) Requirement to monitor operating parameters. (74.23.B.2.a and b)
2. NO<sub>x</sub> and NH<sub>3</sub> emission limit for turbines rated at 2.9 MW to less than 10.0 MW. (74.23.B.1 and 74.23.B.4) Requirement to monitor operating parameters. (74.23.B.2.a and b)
3. NO<sub>x</sub> and NH<sub>3</sub> emission limit for turbines rated at 10.0 MW and higher, with SCR, and operated less than 4,000 hr/yr (74.23.B.1 and 74.23.B.4) Requirement to monitor operating parameters. (74.23.B.2.a and b)
4. NO<sub>x</sub> and NH<sub>3</sub> emission limit and CEMS requirement for turbines rated at 10.0 MW and higher, with SCR, and operated more than 4,000 hr/yr (74.23.B.1, 74.23.B.2, and 74.23.B.4)
5. NO<sub>x</sub> emission limit for turbines rated at 10.0 MW and higher, without SCR, and operated less than 4,000 hr/yr (74.23.B.1) Requirement to monitor operating parameters. (74.23.B.2.a and b)

6. NOx emission limit and CEMS requirement for turbines rated at 10.0 MW and higher, without SCR, and operated more than 4,000 hr/yr (74.23.B.1 and 74.23.B.2)
7. NOx emission limit for turbines rated at 4.0 MW and higher, operated less than 877 hr/yr (74.23.B.1) Requirement to monitor operating parameters. (74.23.B.2.a and b)
8. Exemption from the requirements of 74.23.B, for turbines operated less than 200 hrs per calendar year (74.23.C.1.c)
9. Exemption from the requirements of 74.23.B, for emergency standby units operated during either an emergency or maintenance operation. (74.23.C.1.d)
10. Pre-April 30, 2001 NOx emission limit and CEMS requirement and post-April 30, 2001 NOx emission limit and CEMS requirement for turbines rated at over 20 MW, equipped with water injection only where exhaust gases are used to dry paper, and operated more than 4,000 hr/yr (74.23.B.1, 74.23.B.2, 74.23.B.5, and 74.23.I.3)

#### Rule 103, "Continuous Monitoring Systems"

1. CEM requirements for an emission source required by a federal regulation to install, maintain, and operate a continuous monitoring system (103.A.1)
2. CEM requirements for boilers, steam generators, and process heaters with a heat input capacity of between 40 MMBTU/Hr and 250 MMBTU/Hr, and a capacity factor of at least 30% (103.A.2)
3. CEM requirements for gas-fired boilers, steam generators, and process heaters with a heat input capacity of 250 MMBTU/Hr or more (103.A.3)
4. CEM requirements for any equipment which emits 5 lb/hr or 40 lb/day or more of any single air contaminant (103.A.4)

#### 40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engine (RICE MACT)

1. Existing compression ignition and spark ignition engine compliance dates
2. Existing landfill gas engines – area source
3. Existing emergency diesel engines – area source
4. Existing non-emergency diesel engines  $\leq 300$  HP – area source
5. Existing non-emergency diesel engines  $300 \text{ HP} < X \leq 500 \text{ HP}$  – area source
6. Existing non-emergency diesel engines  $< 500$  HP – area source
7. Existing non-emergency spark-ignited remote engine  $> 500$  HP – area source
8. Existing non-emergency diesel engines greater than 300 HP at an area source of HAPs that qualify under the national security exemption
9. Existing emergency spark ignited engines

M:\TITLE\TV Permits\PO0214\Permit V\Code Key-221.docx

### 3. PERMITTED THROUGHPUT AND CONSUMPTION LIMIT TABLE

#### Purpose

The purpose of this table is to list the emissions units at this stationary source that have limitations on throughput, fuel consumption, raw material usage, hours of operation, or other parameters that limit the potential to emit of the emissions unit. In some cases, the limit on the potential to emit is expressed directly as a set of pollutants and emission limits in tons per year.

These limitations are applied pursuant to Rule 26, "New Source Review" or Rule 29, "Conditions on Permits." Two sets of limits are listed in this table. The "Throughput Permit Limit" is the enforceable limit pursuant to this permit. Permit conditions that enforce these limits are listed in Section No. 7, "Permit Specific Conditions" of this permit.

The "Calculation Throughput" is used only to calculate permitted emissions pursuant to Rule 29, "Conditions on Permits."

#### Equipment Description

This portion of the table is the same as the equipment description in the "Permitted Equipment and Applicable Requirements Table."

#### Throughput Permit Limit

The throughput or consumption limit listed in this column of the table is an enforceable limit on the emissions unit's potential to emit. In the column labeled "District (D)/ Federal (F) Enforceable," a "D" or an "F" denotes whether the limit is only enforceable by the District or whether the limit is a federally-enforceable limit. District-enforceable limits are limits applied solely pursuant to Rule 29, "Conditions on Permits." Limits that have been applied pursuant to Rule 26, "New Source Review" are federally enforceable.

The throughput permit limit may apply to a single emissions unit or to a set of emission units. When the limit applies to set of emissions units, the set consists of the emissions unit with which the limit is listed and the emissions units which follow that have an asterisk in the throughput permit limit column.

Pursuant to Rule 26 and Rule 29, the throughput permit limit is an annual limit which is enforceable based on a period of any twelve (12) consecutive calendar months.

Note that when the calculation throughput (discussed below) corresponds to using the emissions unit full time (8760 hours per year) at maximum rated capacity, the throughput permit limit column contains the notation "No Limit." When District emission calculation procedures do not involve throughput or consumption data, both the throughput permit limit and the calculation throughput

column are left blank.

### Calculation Throughput

The throughput or consumption limit listed in this column of the table is the throughput used in the District calculation procedures to calculate permitted emissions for the emissions unit. The calculation throughput may apply to a single emissions unit or to a set of emissions units denoted as discussed above. The calculation throughput is not an enforceable permit limit.

### Abbreviations

The following abbreviations have been used in the "Permitted Throughput and Consumption Limit Table" for the "Throughput Permit Limit" column and for the "Calculation Throughput Limit" column:

BBL/Yr: barrels per year

Days/Yr: days per year

FO: fuel oil or diesel fuel

Gal/Yr: gallons per year

Hrs/Day: hours per day

Hrs/Yr: hours per year

Lbs/day: pounds per day

Lbs ROC/Yr: pounds of reactive organic compounds per year

MBBL/Yr: thousands of barrels per year

MGal/Yr: thousands of gallons per year

MMBTU/Yr: million British Thermal Units of heat input per year

MMCF/Yr: million standard cubic feet of natural gas per year

MMGal/Yr: million gallons per year

NG: natural gas

TPY: tons per year

TABLE NO. 3

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT Permit to Operate No. 00214 Permitted Throughput/Consumption Limits			
Equipment	Throughput Permit Limit	District (D)/ Federal(F) Enforceable	Calculation Throughput
Cogeneration Unit Including: 1 - 449.6 MMBtu/Hr (HHV) GE LM 6000 PC SPRINT NG 48 MW Gas Turbine, Serial No. 191-668, equipped with: -HRSG (Steam is exported to adjacent refrigeration plant) -STIG (Steam injection for NOx control) -Haldor Topsoe SCR system with aqueous ammonia injection for NOx control -EmeraChem oxidation catalyst for ROC and CO control -Continuous Emission Monitoring (CEM) system for NOx and CO	3480.9 MMCF/Yr  14.62 TPY NOx	F  F	3480.9 MMCF/yr
1 - 121 BHP Caterpillar Diesel-Fired Emergency Standby Engine, Model 3208, Serial No. 90N72137, used for fire suppression	50 Hrs/Yr (for maintenance and testing)	D	50 Hrs/Yr

M:\TITLE\TV Permits\PO0214\PERMIT V\Tables\_0214\_rev221

#### 4. PERMITTED EMISSIONS TABLE

##### Purpose

The purpose of this table is to document the permitted emissions for this stationary source. Rule 29, "Conditions on Permits," requires permitted emissions to be included on each Permit to Operate. Rule 29 is not federally enforceable.

The permitted emissions table also characterizes the amount and type of criteria air pollutants emitted by this stationary source.

Rule 29 requires that annual permitted emissions be based on a 12 calendar month rolling period and be expressed in units of tons per year. Hourly permitted emissions are required to be expressed in units of pounds per hour. Permitted emissions for a stationary source are required to be determined by aggregating the permitted emissions for each emissions unit at the stationary source.

In general, permitted emissions are calculated based on throughput or consumption data for an emission unit, specific physical characteristics of the emission unit, and emission factors. The emission factors may be standard published emission factors or they may be derived from source test data or specific emission limits that apply to the emissions unit. In some cases, permitted emissions are expressed directly as a set of pollutants and emission limits in tons per year without reference to any calculation method.

Section No. 3, "Permitted Throughput and Consumption Limit Table," contains information on the throughput and consumption limits that are enforceable at this stationary source. In addition, other sections of this permit contain conditions that act to enforce specific portions of the permitted emissions table.

##### Equipment Description

This portion of the table is the same as the equipment description in the "Permitted Equipment and Applicable Requirements Table."

##### Tons Per Year

This column of the table represents the permitted emissions in units of tons per year for ROC (reactive organic compounds), NO<sub>x</sub> (nitrogen oxides), PM (particulate matter), SO<sub>x</sub> (sulfur oxides), and CO (carbon monoxide). In some cases, emissions of non-criteria pollutants of interest may also be listed. Pursuant to Rule 29, annual permitted emissions shall be the annual emissions used to determine compliance for issuance of any new or revised permit issued after October 22, 1991. For emissions units for which no new or revised permit has been issued since

October 22, 1991, annual permitted emissions generally reflect actual historical emissions from the emissions unit.

The permitted emissions limit may apply to a single emissions unit or to a set of emission units. When the limit applies to set of emissions units, the set consists of the emissions unit with which the limit is listed and the emissions units which follow that have an asterisk in the pollutant columns.

#### Pounds Per Hour

This column of the table represents the permitted emissions in units of pounds per hour for ROC (reactive organic compounds), NO<sub>x</sub> (nitrogen oxides), PM (particulate matter), SO<sub>x</sub> (sulfur oxides), and CO (carbon monoxide). Pursuant to Rule 29, hourly permitted emissions shall be calculated based on the maximum quantity of each air pollutant which may be emitted from the emissions unit during a one hour period, as limited by any applicable rules or permit conditions.

#### Hazardous Air Pollutants

This permit does not provide information that characterizes the emissions of hazardous air pollutants (HAPS) from this facility. This information can be obtained from the reissuance application or the facility's AB-2588, Air Toxics "Hot Spots," Report referenced at the bottom of the "Permitted Emissions Table." For Outer Continental Source (OCS) sources and other sources not subject to AB-2588, HAP emissions information is included in the permit reissuance application and is maintained by the stationary source.

TABLE NO. 4

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT												
Permit to Operate No. 00214												
Permitted Emissions												
Equipment	TONS PER YEAR						POUNDS PER HOUR					
	ROC	NOx	PM	SOx	CO	NH3	ROC	NOx	PM	SOx	CO	NH3
Cogeneration Unit Including: 1 - 449.6 MMBtu/Hr (HHV) GE LM 6000 PC SPRINT NG 48 MW Gas Turbine, Serial No. 191-668, equipped with: -HRSG (Steam is exported to adjacent refrigeration plant) -STIG (Steam injection for NOx control) -Haldor Topsoe SCR system with aqueous ammonia injection for NOx control -EmeraChem oxidation catalyst for ROC and CO control -Continuous Emission Monitoring (CEM) system for NOx and CO	4.68	14.62	10.96	1.04	98.42	12.44	1.15	41.44	2.70	0.26	24.21	3.06
1 - 121 BHP Caterpillar Diesel-Fired Emergency Standby Engine, Model 3208, Serial No. 90N72137, used for fire suppression	0.01	0.10	0.01	0.00	0.02		0.07	1.01	0.07	0.02	0.22	
<b>Total Permitted Emissions</b>	<b>4.69</b>	<b>14.72</b>	<b>10.97</b>	<b>1.04</b>	<b>98.44</b>	<b>12.44</b>	<b>1.22</b>	<b>42.45</b>	<b>2.77</b>	<b>0.28</b>	<b>24.43</b>	<b>3.06</b>
HAP Emissions Ref.: AB 2588 Air Toxics Report			Reporting Year: 1995				Submittal Date: 02-24-97					

M:\TITLE\TV Permits\PO0214\PERMIT V\Tables\_0214\_rev221



## 5. EXEMPT EQUIPMENT LIST

Rule 33.2.A.3 (Part 70 Permits - Application Contents) requires the applicant to provide a list of all emissions units located at the stationary source that are exempt pursuant to Rule 23 based on size or production rate. Pursuant to Rule 33.2.A.3, emissions from insignificant activities do not need to be included in the permit application.

This section of the permit contains a table entitled "Insignificant Activities (Exempt Equipment)." This table is a list of insignificant activities (exempt equipment) at the facility that are exempt from permit based on a size or production rate exemption in Rule 23, "Exemptions from Permit." Insignificant Activity is defined in Rule 33.1 (Part 70 Permits – Definitions). The permittee shall provide calculations, usage records, emission records, and/or operational data as necessary to substantiate an activity as insignificant.

This table is presented for informational purposes only. Any changes to this list are not considered to be permit modifications, nor is the list considered to be enforceable. As detailed in Rule 33.2.A.3, this list is required to be submitted with an application for permit reissuance. The general requirements listed in Section No. 8 of this permit may apply to these insignificant activities.

Ventura County Air Pollution Control District  
**INSIGNIFICANT ACTIVITIES (EXEMPT EQUIPMENT)**  
 Part 70 Permit No. 00214

INSIGNIFICANT ACTIVITIES (EXEMPT EMISSION UNITS)	BASIS FOR EXEMPTION (Size/Production Rate)	RULE 23 CITATION
Storage Tanks: Diesel Fuel (140 Gallons) Jet Oil (65 Gallon) Generator Lube Oil (65 Gallon) Hydraulic Starter Fluid (65 Gallon) Fuel Gas Compressor Crankcase Oil (65 Gallon) Fuel Gas Compressor Lubrication Oil (65 Gallon) Feed Water Pump Bearing Oil (65 Gallon) Misc. Pump Bearing Oil (65 Gallon)	Storage in or loading into any tank having a capacity of 550 gallons or less that is equipped with a submerged fill pipe and is not required to have a vapor recovery system	23.F.1
Solvent Wipe Cleaning Operations	Certified SCAQMD Clean Air Solvents or solvent with ROC content < 25 mg/l	23.F.10.a or 23.F.10.b
Coating Operations	Coating operations, other than motor vehicle or mobile equipment coating operations, where less than 200 pounds each of ROC, methylene chloride, 1,1,1 trichloroethane, and perchloroethylene are lost to the atmosphere during every rolling period of 12 consecutive calendar months	23.F.11.b

M:\TITLEV\TV Permits\PO0214\Permit V\EXEMPT-171.docx

## 6. SPECIFIC APPLICABLE REQUIREMENTS (ATTACHMENTS)

As discussed in Section No. 2, "Permitted Equipment and Applicable Requirements Table," the emissions units at this stationary source listed in the table have requirements that are specifically applicable to them. The applicable requirements are based on the District's prohibitory rules, State of California ATCM's, federal NSPS (40 CFR Part 60), federal NESHAPS (40 CFR Part 61), and federal NESHAPS/MACT (40 CFR Part 63).

In this section of the permit, the permit conditions that are associated with each specific applicable requirement are listed in an individual attachment. The attachment is identified with the label "Attachment (APCD Rule No. or CFR No.) #" in the lower left corner. Each attachment has an applicability section that describes how and why this attachment applies to the specific emissions unit. The attachment may apply to one or more of the emissions units listed in the Permitted Equipment and Applicable Requirements Table in Section No. 2.

**Ventura County Air Pollution Control District  
Part 70 Permit No. 00214  
Gas Turbine Based Cogeneration Unit  
NO<sub>x</sub>, CO, ROC, and NH<sub>3</sub> Applicable Requirements  
Including Streamlined NO<sub>x</sub> Requirements**

**Rule 26, "New Source Review"**

**Conditions applied pursuant to Rule 26 are Federally Enforceable**

**Rule 74.23, "Stationary Gas Turbines"**

**Adopted 01/08/02, Federally Enforceable**

**Rule 103, "Continuous Monitoring Systems"**

**Adopted 02/09/99, Federally Enforceable**

**40 CFR Part 60, "Standards of Performance for New Stationary Sources" (NSPS)**

**40 CFR Part 60, Subpart A, "General Provisions"**

**40 CFR Part 60, Subpart KKKK, "Standards of Performance for Stationary Combustion Turbines"**

**Federally Enforceable**

**Applicability:**

This attachment applies to the nitrogen oxides (NO<sub>x</sub> measured as NO<sub>2</sub>), carbon monoxide (CO), and ammonia (NH<sub>3</sub>) emissions at the gas turbine-based cogeneration unit, consisting of a GE LM-6000 PC SPRINT gas turbine, located at E. F. Oxnard, Inc. This attachment describes and streamlines the most stringent requirements of Rule 26, "New Source Review" BACT (Best Available Control Technology) requirements; Rule 74.23, "Stationary Gas Turbines"; Rule 103, "Continuous Monitoring Systems"; and 40 CFR Part 60, Subpart KKKK, "Standards of Performance for Stationary Combustion Turbines" (NSPS). The Ventura County APCD has been delegated authority for 40 CFR Part 60 Subpart KKKK and is considered to be the Administrator.

As shown on the attached table, the Rule 26 BACT NO<sub>x</sub> emission limit is the most stringent in comparison to the Rule 74.23 and NSPS NO<sub>x</sub> emission limits; therefore, the Rule 74.23 and NSPS emission limits are subsumed. The monitoring requirements of District Rule 74.23 and 103 are more stringent than the NSPS requirements; therefore, the NSPS monitoring, recordkeeping, reporting, and test method requirements are subsumed by the requirements of Rules 74.23 and 103. However, there are no startup and shutdown exemption periods from the NSPS NO<sub>x</sub> concentration limit; therefore, the permittee will need to monitor compliance with the NSPS limit with a 30-day rolling average NO<sub>x</sub> emission rate.

Compliance with the terms and conditions of the streamlined NO<sub>x</sub>, CO, ROC, and NH<sub>3</sub> requirements for the cogeneration unit assures compliance with all individual NO<sub>x</sub>, CO, ROC, and NH<sub>3</sub> applicable requirements pertaining to the cogeneration unit which have been addressed in the streamline analysis. The attached table details the determination of this permit shield for the cogeneration unit which consists of a GE LM 6000 PC SPRINT natural gas-fired turbine that drives a 48 MW electrical generator.

**Conditions:**

1. Gas Turbine Emission Limitations:
  - a. Oxides of Nitrogen (NO<sub>x</sub> expressed as NO<sub>2</sub>) emissions shall not exceed 2.0 ppmvd, referenced at fifteen (15) percent oxygen, averaged over one (1) clock hour.
  - b. Reactive Organic Compound (ROC) emissions shall not exceed 2.0 ppmvd, referenced at fifteen (15) percent oxygen, and measured as methane.
  - c. Carbon Monoxide (CO) emissions shall not exceed 24 ppmvd, referenced at fifteen (15) percent oxygen, averaged over one (1) clock hour.
  - d. Ammonia (NH<sub>3</sub>) emissions shall not exceed 5.0 ppmvd, referenced at fifteen (15) percent oxygen.

The NO<sub>x</sub>, ROC, and NH<sub>3</sub> emission concentration limits have been applied as BACT (Best Available Control Technology). The NO<sub>x</sub> emission limit is more stringent than the NO<sub>x</sub> emission limits of Rule 74.23, "Stationary Gas Turbines" and 40 CFR Part 60 Subpart KKKK, "Standards of Performance for Stationary Combustion Turbines." The CO emission limit has been requested by the permittee and has been applied pursuant to Rule 29, "Conditions on Permits."

Compliance with these emission concentration limits shall be demonstrated by annual source testing, and by maintaining the continuous emission monitoring and control system parameter monitoring, as specified in Condition Nos. 4 and 5.

2. The emission limits listed in Condition No. 1 shall not apply to the gas turbine during the thermal stabilization period associated with a start-up, planned shutdown, or unplanned load change. A start-up exemption or an unplanned load change exemption shall not exceed two (2) hours; and a planned shutdown exemption shall not exceed one (1) hour. For failed start-ups, each restart shall begin a new exemption period. This exemption has been applied pursuant to Rule 74.23.C.1.e.
3. The 40 CFR Part 60 Subpart KKKK, "Standards of Performance for Stationary Combustion Turbines," NO<sub>x</sub> concentration limit is 25 ppm at 15 percent oxygen (Section 60.4320(a)). There is no start-up or shutdown exemption periods for this NO<sub>x</sub> emission limit. Therefore, the permittee shall demonstrate compliance with the continuous emission monitor with a 30-day rolling NO<sub>x</sub> average, pursuant to Sections 60.4350(h)

and 60.4380(b)(1).

4. Annual Source Testing:

Once every 12 months (annually), a source test shall be conducted to demonstrate compliance with the emission concentration limits of this permit. The following source test methods shall be used:

- |    |                            |                                     |
|----|----------------------------|-------------------------------------|
| a. | NO <sub>x</sub>            | EPA Method 20                       |
| b. | CO                         | ARB Method 100                      |
| c. | ROC                        | EPA Method 25 or EPA Method 18      |
| d. | Oxygen content             | ARB Method 100                      |
| e. | Gaseous fuel heating value | ASTM Method D 1826-88               |
| e. | NH <sub>3</sub>            | BAAQMD Method ST-1B (Jan. 20, 1982) |

The average of three source test runs shall be used to determine compliance. The tests shall be conducted at normal operating load.

Prior to conducting an annual emissions test, permittee shall notify the APCD Compliance Division. Written notification shall be received no less than 15 calendar days prior to the test. The emissions test report shall indicate the following parameters at normal load: emissions of NO<sub>x</sub>, CO, ROC, and NH<sub>3</sub> in parts per million by volume on a dry basis; parts per million by volume corrected to 15% oxygen on a dry basis; pounds per hour; the amount of excess oxygen in percent by volume; and the fuel and exhaust flow rates, in standard cubic feet per minute. In addition, pursuant to Rule 74.23.B.2, the permittee shall provide documentation, including a certified source test, correlating the control system operating parameters to the associated measured NO<sub>x</sub> emissions. This information may be used by the District to determine compliance when the continuous emission monitoring system is not operating properly. These control system operating parameters include, but are not limited to, the steam injection rate, the steam to fuel ratio, the ammonia injection rate, and the ammonia to NO<sub>x</sub> mole ratio entering the SCR unit. The test report shall also include data to show that the continuous emissions monitors and recorders accurately estimate emissions and concentration limits. The test report and results shall be submitted to the APCD Compliance Division within 45 days after the test.

5. Pursuant to Rule 74.23.B.2, Rule 103.A.4, and NSPS KKKK, the permittee shall provide, properly install, maintain in good working order, operate, and calibrate, in accordance with manufacturers specifications, continuous monitoring systems at the gas turbine based cogeneration unit exhaust to continuously monitor, calculate where appropriate, and record the following data and control system operating parameters:

- a. Fuel consumption rate for the gas turbine;
- b. Monthly fuel consumption;

- c. Exhaust concentration (one clock hour average) of NO<sub>x</sub> and CO, in ppmvd, and in ppmvd corrected to 15% oxygen;
- d. 30-day rolling average NO<sub>x</sub> emission concentration corrected to 15% oxygen;
- e. Stack gas oxygen concentration in percent;
- f. Exhaust flow rate in standard dry cubic feet per minute;
- g. Ratio of the amount of steam injected into the gas turbine's combustor to the amount of fuel consumed by the gas turbine;
- h. Ammonia injection rate;
- i. Ammonia to NO<sub>x</sub> mole ratio entering the SCR reactor;
- j. Temperature at the SCR reactor inlet;
- k. Temperature at the oxidation catalyst inlet;
- l. NO<sub>x</sub> emissions in lbs/hr, tons/month, and tons per rolling 12-month period;
- m. Elapsed time of operation.

Pursuant to Rule 74.23.D.1, these records shall be available for inspection by the District upon request.

- 6. Pursuant to Rule 103.C.2, the continuous emission monitoring system shall be installed, calibrated, and maintained in accordance with the specifications in 40 CFR, Part 60.13, Monitoring Requirements. Section (a) includes by reference 40 CFR Part 60, Appendix B to Part 60, Performance Specifications, and Appendix F to Part 60, Quality Assurance Procedures.
- 7. Pursuant to Rule 103.B.1, the permittee shall report any violation of any emission standard with which the cogeneration unit is required to comply, as indicated by the records of the continuous emissions monitoring device. The report shall be submitted in writing to the District Compliance Division within 96 hours of each occurrence. The District shall, in turn, report the violation to the state within five working days after receiving the report of the violation from the permittee.
- 8. Pursuant to Rule 103.B.2, the permittee shall maintain permanent continuous emission monitoring records. The records shall be in a form suitable for inspection, shall be made available to the Air Resources Board or the District upon request, and shall include:
  - a. The date, time and duration of any startup, shutdown or malfunction in the operation of any affected facility.
  - b. The results of performance testing, evaluations, calibrations, checks, adjustments, and maintenance of any continuous emission monitors that have been installed pursuant to Rule 103.
  - c. Emission measurements.
- 9. Pursuant to Rule 103.B.3, the permittee shall, upon written notice from the District Compliance Division, provide the information listed in Rule 103.B.3.
- 10. Pursuant to Rule 103.B.5.b, continuous monitoring data shall be reduced according to 40

CFR, Part 51, Appendix P, Data Reduction

11. Permittee shall maintain records of all maintenance operations, periodic inspections, and repairs performed on the gas turbine, SCR unit, oxidation catalyst, and continuous emissions monitors. Permittee shall also maintain records and copies of all source test reports and any violations or exceedances of the limits shown in the conditions of this Permit to Operate. These records shall be made available for inspection by the District upon request.
12. Pursuant to Rule 74.23.E, the permittee shall submit a report to the District Compliance Division that contains the following information:
  - a. Actual fuel consumption or operating hours during the previous twelve (12) months; and
  - b. A copy of the required annual source test report and control system operating parameter information.
13. Pursuant to 40 CFR, Part 60, Subpart KKKK, Sections 60.4375(a) and 60.7(c), the permittee shall submit an excess emissions and monitoring systems report every six months. The report shall include the 30-day rolling average NO<sub>x</sub> emissions monitoring.



**NO<sub>x</sub> Streamlining Comparison**  
**Gas Turbine Based Cogeneration Unit, PO No. 00214**

	<b>RULE 74.23 AND RULE 103</b>	<b>NSPS SUBPART KKKK</b>	<b>RULE 26 NSR - BACT</b>
<b>WORK PRACTICE STDS.</b>	None	None	None
<b>EMISSION LIMIT</b>	<p><u>Rule 74.23.B.1</u>            9 x E/25 ppmvd @ 15% O<sub>2</sub>            E = 38.7, reduces to: 14 ppmvd @ 15% O<sub>2</sub>            equivalent emission factor: 46.89 lb NO<sub>x</sub>/mmcf</p>	<p><u>60.4320(a)</u>            25 ppmvd @ 15% O<sub>2</sub>            equivalent emission factor: 96.8 lb NO<sub>x</sub>/mmcf</p>	<p><u>BACT</u>            2.0 ppmvd @ 15% O<sub>2</sub>            equivalent emission factor: 7.74 lb NO<sub>x</sub>/mmcf</p>
<b>MONITORING</b>	<p><u>Rule 74.23</u>            Source test annually for NO<sub>x</sub> and O<sub>2</sub> content (74.23.B.1);            Monitor NO<sub>x</sub> directly w/CEM (103.A.1);            Monitor control system operating parameters and elapsed time of operation (74.23.B.2)  <u>Rule 103</u>            CEM, maintained per 40 CFR, Part 60.13 (103.C.2)</p>	<p><u>60.4335</u>            Continuously monitor fuel consumption and ratio of water (steam) to fuel; or use a continuous emission monitoring (CEM) system for NO<sub>x</sub></p> <p><u>60.4350(h) and 60.4380(b)(1)</u>            Demonstrate compliance with NO<sub>x</sub> limit with a 30-day rolling average</p>	<p>Identical to Rule 74.23</p>

**NO<sub>x</sub> Streamlining Comparison (Continued)**  
**Gas Turbine Based Cogeneration Unit, PO No. 00214**

	<b>RULE 74.23 AND RULE 103</b>	<b>NSPS SUBPART KKKK</b>	<b>RULE 26 NSR - BACT</b>
<b>RECORDKEEPING</b>	<p><u>Rule 74.23.D.1</u>            Continuous records of monitoring requirements specified above (103.B.2)</p> <p><u>Rule 103</u>            NO<sub>x</sub> CEM records, etc., reduce per 40 CFR Part 51 Appendix P, 5.0-5.3.3 (103.B.5)</p>	<p><u>60.433.5</u>            Continuous records of the water (or steam) to fuel ratio; or records of Continuous Emission Monitoring system</p>	<p>Identical to Rule 74.23</p>
<b>REPORTING</b>	<p><u>74.23.E</u>            Actual annual fuel consumption or operating hours            Annual source test report</p> <p><u>Rule 103</u>            Report NO<sub>x</sub> emission limit exceedances to the District within 96 hours (103.B.1)            Provide a summary of the CEM data, upon written request from the District Compliance Division (103.B.4)</p>	<p><u>60.437.5(a) and 60.7(g)</u>            Exceedances and monitor downtime; submit a report every six months</p>	<p>None</p>
<b>TEST METHODS</b>	<p><u>74.23.F</u>            NO<sub>x</sub> - EPA Method 20            O<sub>2</sub> content - ARB Method 100            Gaseous fuel HHV - ASTM Method D 1826-88            NH<sub>3</sub> - BAAQMD Method ST-1B, 1/20/82</p>	<p><u>60.4400</u>            NO<sub>x</sub> - EPA Method 7E or 20</p>	<p>Identical to Rule 74.23</p>

M:\TITTLE\TV Permits\PO0214\Permit V\STRMLN214-NO<sub>x</sub>-CONH3-rev191.docx

**Ventura County Air Pollution Control District  
Part 70 Permit No. 00214  
Gas Turbine Based Cogeneration Unit  
SO<sub>x</sub> Applicable Requirements - Streamlined**

**Rule 54, "Sulfur Compounds"  
Adopted 01/14/14, Federally-Enforceable**

**Rule 64, "Sulfur Content of Fuels"  
Adopted 04/13/99, Federally-Enforceable**

**40 CFR Part 60, "Standards of Performance for New Stationary Sources" (NSPS)  
40 CFR Part 60, Subpart A, "General Provisions"  
40 CFR Part 60, Subpart KKKK, "Standards of Performance for Stationary Combustion  
Turbines"  
Federally-Enforceable**

**Applicability:**

This attachment applies to the sulfur oxides (SO<sub>x</sub> measured as SO<sub>2</sub>) emissions at the gas turbine-based cogeneration unit, consisting of a GE LM-6000 PC SPRINT gas turbine, located at E. F. Oxnard, Inc. This attachment describes and streamlines the most stringent sulfur content of fuel and SO<sub>x</sub> emissions at the point of discharge requirements of Rule 54, "Sulfur Compounds," Rule 64, "Sulfur Content of Fuels," and 40 CFR Part 60, Subpart KKKK, "Standards of Performance for Stationary Combustion Turbines" (NSPS). The Ventura County APCD has been delegated authority for 40 CFR Part 60 Subpart KKKK and is considered to be the Administrator.

As detailed in the attached chart, the NSPS Subpart KKKK SO<sub>x</sub> emission limits are the most stringent in comparison to the Rule 54 and Rule 64 emission limits and sulfur content limits. The cogeneration unit has a Rule 26, "New Source Review," BACT requirement for sulfur oxides to burn Public Utilities Commission (PUC)-regulated natural gas only. Therefore, the Rule 54 and Rule 64 emission limits are subsumed. Both Rule 64 and the NSPS Subpart KKKK require monitoring of the fuel sulfur content at the discretion of the District. Therefore, the monitoring, recordkeeping, reporting, and test methods for Rule 54 and NSPS Subpart KKKK will be also subsumed.

Compliance with the terms and conditions of the streamlined SO<sub>x</sub> requirements for the cogeneration unit assures compliance with all individual SO<sub>x</sub> applicable requirements pertaining to the cogeneration unit which have been addressed in the streamline analysis. The attached table details the determination of this permit shield for the cogeneration unit which consists of an LM 6000 PC SPRINT natural gas-fired turbine that drives a 48 MW electrical generator.

**Conditions:**

1. SO<sub>x</sub> (expressed as SO<sub>2</sub>) emissions shall not exceed 0.90 lbs / MW-hr discharge, or total potential sulfur emissions in the fuel shall not exceed 0.060 lbs / MMBTU heat input. These limits are required by 40 CFR, Part 60, Subpart KKKK, "Standards of Performance for Stationary Combustion Turbines," Section 60.4330.
2. If only Public Utilities Commission-regulated natural gas, propane, or butane is combusted at this facility, it will be assumed that the permittee is complying with NSPS Subpart KKKK without additional periodic monitoring requirements. Any person claiming this exemption shall maintain records sufficient to substantiate the use of these fuels.
3. If other than Public Utilities Commission-regulated natural gas, propane, or butane is being combusted, the permittee shall analyze the sulfur content of the fuel on an annual basis using South Coast AQMD Method 307-94 - Determination of Sulfur in a Gaseous Matrix or by ASTM D1072-90 (1994), Standard Test Method for Total Sulfur in Fuel Gases.
4. Pursuant to Rule 54.B.1.a.8, no person shall discharge sulfur compounds, which would exist as a liquid or gas at standard conditions, in excess of 300 ppm by volume, on a dry basis, for gas turbines, corrected to 15% oxygen, calculated as sulfur dioxide (SO<sub>2</sub>) by volume at the point of discharge.

In order to comply with Rule 54.B.1.a.8, permittee shall comply with the fuel sulfur content limits of NSPS Subpart KKKK. No additional periodic monitoring requirements for Rule 54 are required beyond the periodic monitoring requirements of NSPS Subpart KKKK.

5. Upon District request, sulfur compounds at the point of discharge shall be determined by source testing using EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or South Coast AQMD Test Method 307-94 (Determination of Sulfur in a Gaseous Matrix), as appropriate.

**SO<sub>x</sub> Streamlining Comparison**  
**Gas Turbine Based Cogeneration Unit, PO No. 00214**

	<b>RULES 54 and 64</b>	<b>NSPS SUBPART KKKK</b>	<b>RULE 26 NSR - BACT</b>
<b>WORK PRACTICE STDS.</b>	None	None	None
<b>EMISSION LIMIT</b>	<p><u>Rule 54.B.1.a.8</u>            ≤ 300 ppmvd @ 15% O<sub>2</sub>            (EF = 1612.8 lb SO<sub>x</sub>/mmcf)</p> <p><u>Rule 64.B.1</u>            Sulfur Compounds ≤ 50 grains per 100 ft<sup>3</sup> (788 ppmv) calculated as H<sub>2</sub>S @ standard conditions (Equivalent EF = 134.5 lb SO<sub>x</sub>/mmcf)</p>	<p><u>60.4330</u>            0.90 lbs / MWh gross output            or            0.060 lb SO<sub>x</sub> / MMBTU heat input            (Equivalent EF = 63.0 lb SO<sub>x</sub>/mmcf)</p>	<p>Permitted to burn Public Utilities Commission (PUC)-regulated natural gas only</p>
<b>MONITORING</b>	<p><u>Rules 54 and 64</u>            PUC-quality natural gas - None            Non-PUC quality natural gas - Annual analysis of fuel sulfur content</p>	<p><u>60.4365</u>            PUC-quality natural gas - None, as approved by the District (Administration)</p>	None

**SO<sub>x</sub> Streamlining Comparison (Continued)**  
**Gas Turbine Based Cogeneration Unit, PO No. 00214**

	<b>RULES 54 and 64</b>	<b>NSPS SUBPART KKKK</b>	<b>RULE 26 NSR - BACT</b>
<b>RECORDKEEPING</b>	<p><u>Rules 54 and 64</u>  PUC-quality natural gas - None  Non-PUC quality natural gas - Maintain records of annual fuel analyses</p>	<p>PUC-quality natural gas - None, as approved by the District (Administrator)  Non-PUC quality natural gas - Maintain records of annual fuel analyses, as approved by the District (Administrator)  <u>60.4375(a)</u>  Exceedances and down time  <u>60.4415(2)</u>  SO<sub>x</sub> - EPA Method 6, 6C, 8, 15, 16A, 16B, or SCAQMD Method 307-94  <u>60.4415(1)</u>  Sulfur content of gaseous fuels - ASTM D4177 (sampling) and ASTM D1072 (analysis) 1072-80</p>	None
<b>REPORTING</b>	<p>Provide fuel records to the District upon request</p>		None
<b>TEST METHODS</b>	<p><u>Rule 54.D.1</u>  SO<sub>x</sub> - EPA Methods 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD Method 307-94  <u>Rule 64.E</u>  Sulfur content of gaseous fuels - SCAQMD Method 307-94 or other options (see Rule 64.E)</p>		None

M:\TITLE\TV Permits\PO0214\Permit V\STRMLN214-SOx-rev221.docx

**Ventura County Air Pollution Control District**  
**Rule 74.9.D.3 Applicable Requirements**  
**Emergency Standby Stationary Internal Combustion Engines**  
**Operated During Either an Emergency or Maintenance Operation**

**Rule 74.9, "Stationary Internal Combustion Engines"**

**Adopted 11/08/05, Federally-Enforceable**

**Applicability:**

This attachment applies to emergency standby stationary internal combustion engines rated at 50 or more horsepower, not subject to the provisions of APCD Rule 74.16, "Oilfield Drilling Operations," and operated during an emergency or maintenance operation. Maintenance operation is limited to 50 hours per calendar year. Pursuant to Rule 74.9.D.3, emergency standby stationary internal combustion engines operated during an emergency or during maintenance operation of no more than 50 hours per calendar year are exempt from all provisions of Rule 74.9.

As detailed in Rule 74.9.I.2 an emergency standby engine is defined as an internal combustion engine used only when normal power line or natural gas service fails, or for the emergency pumping of water for either fire protection or flood relief. An emergency standby engine may not be operated to supplement a primary power source when the load capacity or rating of the primary power source has been either reached or exceeded.

**Conditions:**

1. Pursuant to Section D.3 of Rule 74.9, an applicable emergency standby stationary internal combustion engine shall only be operated during an emergency or during maintenance operation of not more than 50 hours per calendar year.

Pursuant to Section I.5 of Rule 74.9, a maintenance operation is defined as the use of an emergency standby engine and fuel system during testing, repair and routine maintenance to verify its readiness for emergency standby use.

2. Pursuant to Section D.3 of Rule 74.9, each emergency standby engine shall be equipped with an operating, non-resettable, elapsed hour meter.
3. Pursuant to Section F.1 of Rule 74.9, the Annual Compliance Certification shall include the following records for each emergency standby engine: Engine manufacturer, model number, operator identification number, and location.

4. Pursuant to Section F.2 of Rule 74.9, the annual engine hours of maintenance operation shall be reported annually. A report shall be provided to the District after every calendar year by February 15.

M:\TITLEV\Attachments updated\749N7 (11-08-05).docx



**Ventura County Air Pollution Control District  
California Airborne Toxic Control Measure For  
Stationary Compression Ignition Engines  
In-Use Emergency Fire Pump Assembly Engines**

**Section 93115, Title 17, California Code of Regulations, Airborne Toxic Control Measure  
for Stationary Compression Ignition (CI) Engines  
Effective 05/19/11**

The District is required to implement and enforce the state ATCM. The ATCM is not federally-enforceable.

**Applicability:**

This attachment describes the requirements of California Airborne Toxic Control Measure (ATCM) For Stationary Compression Ignition (CI) Engines that apply to in-use stationary diesel-fueled CI engines that drive fire pump assemblies. Section 93115.3(n) of the ATCM exempts such engines from the emission standards for stationary emergency standby diesel-fueled CI engines as listed in Section 93115.6(b)(3) of the ATCM. The exempt engines must only be operated the number of hours necessary to comply the testing requirements of National Fire Protection Association (NFPA) 25 – “Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems,” 2002 edition. An “in-use” engine is an engine that was installed at a facility prior to January 1, 2005. Pursuant to Section 93115.4(a)(8) CARB Diesel Fuel means any diesel fuel that meets the specifications of vehicular diesel fuel, as defined in title 13, CCR, sections 2281 and 2282. The Verification Procedure is defined in Section 93115.4(a)(78).

**Conditions:**

1. Pursuant to subsection 93115.5(a), as of January 1, 2006, the permittee shall not fuel the engine with any fuel unless the fuel is one of the following:
  - a. CARB Diesel Fuel, or
  - b. An alternative diesel fuel that is:
    - 1) biodiesel;
    - 2) a biodiesel blend that does not meet the definition of CARB diesel Fuel
    - 3) a Fischer-Tropsch fuel; or
    - 4) an emulsion of water in diesel fuel; or
  - c. any alternative diesel fuel that is not identified in section 93115.5(a)(2) and meets the requirements of the Verification Procedure; or
  - d. an alternative fuel; or
  - e. CARB Diesel Fuel used with fuel additives that meets the requirements of the Verification Procedure; or

- f. any combination of the above.
- 2. Pursuant to subsection 93115.10(f)(1)(E), the permittee shall keep a monthly log of each engine's hours of operation to comply with the requirements of NFPA 25.
- 3. Pursuant to subsection 93115.5(f)(1)(H), the permittee shall document fuel use in the engines. For engines operated exclusively on CARB Diesel Fuel, the owner or operator shall document the use of CARB Diesel Fuel through the retention of fuel purchase records indicating that the only fuel purchased for supply to an emergency standby engine was CARB Diesel Fuel; or for engines operated on any fuel other than CARB Diesel Fuel, the fuel records demonstrating that the only fuel purchased and added to an emergency standby engine or engines, or to any fuel tank directly attached to an emergency standby engine or engines, meets the requirements of section 93115.5(b).

M:\TITLEV\Attachments updated\ATCM Engine N1 (05-19-11).docx

**Ventura County Air Pollution Control District  
National Emission Standards for Hazardous Air Pollutants  
For Stationary Reciprocating Internal Combustion Engines  
Existing Emergency Diesel Engines at an Area Source of HAPs**

**40 CFR Part 63, Subpart ZZZZ, “National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines” (RICE MACT)  
RICE MACT Last Revised 01/30/13**

**Applicability:**

The NESHAP for Stationary Reciprocating Internal Combustion Engines is applicable to all stationary reciprocating internal combustion engines (RICE) at both major and area sources of hazardous air pollutants. The NESHAP is applicable to both compression ignition (CI – diesel) engines and spark ignition (SI – natural gas, landfill gas, gasoline, propane, etc.) engines. The specific conditions below are for existing emergency diesel engines at an area source. An engine is defined as “existing” if it was constructed before June 12, 2006. A stationary source is defined as an “area source” if it is not a major source of HAP (Hazardous Air Pollutants) emissions; meaning the stationary source does not emit or have the potential to emit any single HAP at a rate of 10 tons or more per year or any combination of HAP at a rate of 25 tons or more per year.

Pursuant to Section 63.6640(f) and Section 63.6675, an “emergency engine” is any engine whose operation is limited to emergency situations and required testing and maintenance. An emergency can be the loss of grid power or the stationary source’s own power production. An emergency engine may also participate in an emergency demand response program under limited circumstances. Stationary RICE used for peak shaving or as part of a financial arrangement to supply power into the grid, or as a part of a non-emergency demand response program are not considered emergency stationary RICE.

For more up-to-date information regarding RICE NESHAP standards, please refer to the following link: <https://www.epa.gov/stationary-engines/national-emission-standards-hazardous-air-pollutants-reciprocating-internal-0>

**Conditions:**

1. Pursuant to Section 63.6603(a), Table 2d, the permittee shall comply with the following operating requirements:
  - a. Change oil and filter every 500 hours of operation or annually, whichever comes first. An oil analysis program as described in Section 63.6625(i) can be utilized in order to extend the specified oil change requirement.
  - b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes

first, and replace as necessary.

- c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

Pursuant to Table 2d, if an emergency RICE is operating during an emergency and it is not possible to perform the above maintenance or if performing the maintenance would otherwise pose an unacceptable risk under federal, state, or local law, the maintenance can be delayed and should be performed as soon as practicable after the emergency has ended or the unacceptable risk has abated. All such maintenance delays shall be reported to the APCD Compliance Division.

2. Pursuant to Section 63.6625(e) and 63.6640(a), Table 6, the permittee shall operate and maintain the stationary RICE according to the manufacturer's emission-related written instructions or develop your own plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
3. Pursuant to Section 63.6625(f), the RICE shall be equipped with a non-resettable hour meter.
4. Pursuant to Section 63.6625(h), the permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.
5. Pursuant to Sections 63.6640(f) and 63.6675, the permittee shall operate the emergency RICE in compliance with the following requirements:
  - a. There is no time limit on the use of emergency stationary RICE in emergency situations. An emergency can be the loss of grid power or the stationary source's own power production.
  - b. The use of the engine is limited to 100 hours per calendar year for maintenance checks and readiness testing, emergency demand response, 5% or greater voltage or frequency deviation situations, and up to 50 hours per year for non-emergency situations as detailed in Section 63.6640(f)(4). The 50 hours are to be counted in the 100 hours limit.
  - c. The emergency stationary RICE may be operated up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided above. The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-

emergency demand response to generate income for a facility. The 50 hours per year for non-emergency situations can be used to supply power as part of a financial agreement with another entity if all of the requirements of Section 63.6640(f)(4)(ii)(A–E) are met. The 50 hours per year limit is to be counted towards the 100 hours per year limit.

6. Pursuant to Sections 63.6655(e) and 63.6655(f), the permittee shall maintain the following records:
  - a. Records of maintenance conducted on the stationary emergency RICE.
  - b. Records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency, and how many hours are spent for non-emergency operation.
7. If the engine is contractually obligated to be available for more than 15 hours per year for emergency demand response, 5% or greater voltage or frequency deviation situations, or for non-emergency situations as detailed in Section 63.6640(f)(4)(ii) the engine must use a diesel fuel that meets the requirements in 40 CFR 80.510(b) for non-road diesel fuel. This fuel is commonly known as ultra low sulfur diesel or ULSD. Any diesel fuel purchased (or otherwise obtained) prior to January 1, 2015 may be used until depleted. (Section 63.6604(b))
8. If the engine is contractually obligated to be available for more than 15 hours per year for emergency demand response, 5% or greater voltage or frequency deviation situations, or for non-emergency situations as detailed in Section 63.6640(f)(4)(ii) the permittee is required to compile and submit a report as required by Section 63.6650(h). This report includes, but is not limited to, location information, engine information, hours of operation, and fuel requirement deviations. The first annual report must cover calendar year 2015 and must be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year. As required by Section 63.6650(h)(3), the annual report must be submitted electronically via EPA’s Central Data Exchange (CDX). (Section 63.6650(h))
9. On an annual basis, the permittee shall certify that all engines at this stationary source are operating in compliance with 40 CFR Part 63, Subpart ZZZZ, “National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Engines” (RICE MACT).

## 7. PERMIT SPECIFIC CONDITIONS (ATTACHMENTS)

As discussed in Section No. 2, "Permitted Equipment and Applicable Requirements Table," the emissions units at this stationary source listed in the table have requirements that are specifically applicable to them. The applicable requirements are primarily based on Rule 26, "New Source Review" requirements (e.g., BACT and offset requirements), or Rule 29, "Conditions on Permits" requirements (e.g., throughput recordkeeping requirements, specific requirements that limit emissions, etc.). These requirements are in addition to the specific applicable requirements listed in Section No. 6.

In this section of the permit, the permit conditions that are associated with each specific applicable requirement are listed in an individual attachment. The attachment is identified with the label "Attachment PO (Title V Permit No.) PC#" in the lower left corner. Each attachment has an applicability section that describes how and why this attachment applies to the specific emissions unit. The attachment may apply to one or more of the emissions units listed in the Permitted Equipment and Applicable Requirements Table in Section No. 2.

**Ventura County Air Pollution Control District  
Part 70 Permit No. 00214  
Additional Permit Requirements**

**Rule 23, “Exemptions from Permit”**

**Rule 26, “New Source Review”**

**Rule 29, “Conditions on Permits”**

Conditions applied pursuant to Rule 26 are federally enforceable and conditions applied pursuant to Rule 29 are District enforceable only.

**Applicability:**

This attachment applies to the entire stationary source. These requirements are in addition to any other specific or general requirements referenced in this permit.

**Conditions:**

1. In order to comply with the throughput and consumption limits of this permit, the permittee shall maintain monthly records of throughput and consumption as detailed in Section No. 3, “Permitted Throughput and Consumption Limit Table,” of this permit. The monthly records shall be summed for the previous 12 months. Throughput or consumption totals for any of these 12-calendar month rolling periods in excess of the specified limit shall be considered a violation of this permit. This is a general throughput and consumption recordkeeping condition and applies unless another throughput and consumption recordkeeping condition appears in this section of the permit. (Rules 26 and 29)
2. Combustion equipment listed in the Section No. 2, “Permitted Equipment and Applicable Requirements Table,” and the Section No. 3, “Permitted Throughput and Consumption Limit Table,” as being fired on natural gas shall only burn natural gas and are not permitted to burn any other fuel. (Rule 26)
3. Pursuant to Rule 23.F.7, the use of solvents, in addition to the use of coatings, adhesives, lubricants, and sealants, for facility and building maintenance and repair is exempt from permit. However, the use of such materials by contractors for the maintenance and repair of process and industrial equipment is not exempt from permit pursuant to Rule 23.F.7, unless the material is exempted under another specific section of Rule 23. Pursuant to Rule 23.F.6, the use of non-refillable aerosol cans is exempt from permit. Pursuant to Rule 23.F.10, the use of cleaning agents certified by the SCAQMD as Clean Air Solvents (Rule 23.F.10.a) and the use of cleaning agents that contain no more than 25 grams per

liter of ROC as used or applied, and no more than 5 percent by weight combined of methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, and chloroform (Rule 23.F.10.b), is also exempt from permit. This permit does not limit the usage of acetone. Acetone is exempt from permit and record keeping requirements, as it is not defined as a reactive organic compound.

In order to substantiate the solvent use exemptions listed above, the permittee shall maintain a list of all exempt solvents used at the stationary source and a reference to the specific permit exemption status.

(Rule 29)

4. Annual NO<sub>x</sub> emissions from the GE LM 6000 PC SPRINT Gas Turbine shall not exceed 14.62 tons per year.

In order to demonstrate compliance with this condition, the permittee shall maintain a continuous in-stack emissions monitoring and recording system as required by Attachment STRMLN214-NO<sub>x</sub>,CO,NH<sub>3</sub>.

Emissions of NO<sub>x</sub> from the gas turbine shall be obtained from the continuous emissions monitor. The monthly NO<sub>x</sub> emissions shall be summed for the previous 12 months. Any twelve-month period in excess of the specified limit shall be considered to be a violation of this condition.

(Rule 26)

M:\TITLEV\TV Permits\PO0214\Permit V\PC1-rev221.docx



## 8. GENERAL APPLICABLE REQUIREMENTS (ATTACHMENTS)

The general applicable requirements are broadly applicable requirements that apply and are enforced in the same manner for all subject emissions units or activities. These requirements can normally be adequately addressed in the permit application with minimal or no reference to any specific emissions unit or activity, provided that the scope of the requirement and the manner of its enforcement are clear. Examples of such requirements include those that apply identically to all emissions units at a facility (e.g., source-wide opacity limits), general housekeeping requirements, and requirements that apply identical emissions limits to small units (e.g., process weight requirements).

As detailed in the Title V Permit Reissuance Application, general applicable requirements that apply to this facility were determined. The permit conditions associated with each generally applicable requirement are listed in an individual attachment. The attachment is identified with the label "Attachment (APCD Rule No.) \_\_\_\_" in the lower left corner of each attachment. Each attachment has an applicability section that describes the emissions units to which the attachment applies. Each attachment may apply to one or more of the emissions units listed in the Applicable Requirements Table of Section No. 2. Note that these general applicable requirements may also apply to emissions units not required to be listed in the permit, such as those that are short-term.

**Ventura County Air Pollution Control District**  
**Rule 50 Applicable Requirements**  
**Opacity**

**Rule 50, "Opacity"**

**Adopted 04/13/04, Federally-Enforceable**

**Applicability:**

This attachment applies to all emissions units at this stationary source.

**Conditions:**

1. Pursuant to Rule 50.A, permittee shall not discharge into the atmosphere from any single source whatsoever any air contaminants for a period or periods aggregating more than three (3) minutes in any one (1) hour which are as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, or equivalent to 20% opacity and greater, unless specifically exempted by Rule 50.
2. Permittee shall perform daily visual inspections to ensure that compliance with Rule 50 is being maintained. A record shall be kept of any occurrence of visible emissions other than uncombined water greater than zero percent for a period or periods aggregating more than three (3) minutes in any one (1) hour. These records shall include the date, time, and identity of emissions unit. If the visible emissions problem cannot be corrected within 24 hours, permittee shall provide verbal notification to the District within the subsequent 24 hours. These visible emissions records shall be maintained at the facility and submitted to the District upon request.
3. On an annual basis, permittee shall certify that all emissions units at the facility are complying with Rule 50. This annual compliance certification shall include a formal survey identifying the date, time, emissions unit, and verification that there are no visible emissions other than uncombined water greater than zero percent for a period or periods aggregating more than three (3) minutes in any one (1) hour. As an alternative, the annual compliance certification shall include a formal survey identifying the date, time, emissions unit, and verification that there are no visible emissions for a period or periods aggregating more than three (3) minutes in any one (1) hour which are as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, or equivalent to 20% opacity and greater, as determined by a person certified in reading smoke using EPA Method 9, or any other appropriate test method as approved in writing by the District, the California Air Resources Board, and the U.S. Environmental Protection Agency.
4. Upon District request, opacity shall be determined by a person certified in reading smoke using EPA Method 9 or a certified, calibrated monitoring system.

**Ventura County Air Pollution Control District  
Rule 54 Applicable Requirements  
Sulfur Compounds - Sulfur Emissions from  
Combustion Operations at Point of Discharge**

**Rule 54, "Sulfur Compounds"**  
**Adopted 01/14/14, Federally Enforceable**

**Rule 64, "Sulfur Content of Fuels"**  
**Adopted 04/13/99, Federally-Enforceable**

**Applicability:**

This attachment applies to all combustion emissions units at this stationary source that combust gaseous or liquid fuels. This attachment addresses the requirements of Rule 54 for sulfur emissions at the point of discharge. It can be demonstrated that compliance with the fuel sulfur content limits of Rule 64 ensures compliance with the sulfur emission limits of Rule 54.

**Conditions:**

1. Pursuant to Rule 54.B.1.a, no person shall discharge sulfur compounds from any combustion operation, which would exist as a liquid or gas at standard conditions, in excess of the following limit at the point of discharge:

300 ppm by vol, on a dry basis, as sulfur dioxide (SO <sub>2</sub> ), at 3% oxygen	For sources subject to: Rule 74.11, "Natural Gas-Fired Water Heaters" Rule 74.11.1, "Large Water Heaters and Small Boilers" Rule 74.15, "Boilers, Steam Generators, and Process Heaters" Rule 74.15.1, "Boilers, Steam Generators, and Process Heaters" (1 to 5 MMBTUs)
300 ppm by vol, on a dry basis, as sulfur dioxide (SO <sub>2</sub> ), at 15% O <sub>2</sub>	For sources subject to: Rule 74.9, "Stationary Internal Combustion Engines" Rule 74.23, "Stationary Gas Turbines" Flares and all other combustion operations

2. In order to comply with Rule 54, permittee shall comply with the fuel sulfur content limits of Rule 64. No additional periodic monitoring requirements for Rule 54 are required beyond the periodic monitoring requirements of Rule 64.
3. Upon District request, sulfur compounds at the point of discharge shall be determined by source testing using EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or South Coast AQMD Test Method 307-91 (Determination of Sulfur in a Gaseous Matrix), as appropriate.

M:\TITTLEV\Attachments updated\54B1 (01-14-14).docx

**Ventura County Air Pollution Control District**  
**Rule 54 Applicable Requirements**  
**Sulfur Compounds - Sulfur Dioxide Concentration at Ground Level**

**Rule 54, "Sulfur Compounds"**  
**Adopted 01/14/14, Federally Enforceable**

**Applicability:**

This attachment applies to all emissions units at this stationary source that emit sulfur compounds. This attachment addresses the requirements of Rule 54 for sulfur emissions at ground or sea level at or beyond the property line of the stationary source.

**Conditions:**

1. Pursuant to Rule 54, no person shall discharge sulfur compounds, which would exist as a liquid or gas at standard conditions, as sulfur dioxide which results in average ground or sea level concentrations at any point at or beyond the property line in excess of 0.25 ppmv averaged over any one hour period, or 0.04 ppmv averaged over any 24 hour period.
2. Pursuant to Rule 54.B.2.a, no person shall discharge sulfur compounds, which would exist as a liquid or gas at standard conditions, as sulfur dioxide which results in ground or sea level concentrations at any point at or beyond the property line such that the 1-hour average design value exceeds 0.075 ppm (Vol).
  - a) For purposes of Subsection B.2.a, the design value is derived from the 3-year average of annual 99th percentile daily maximum 1-hour values. At the District's discretion, compliance with the ground or sea level concentration limit in Subsection B.2.a of this rule may be demonstrated using EPA-approved dispersion models or ambient air monitoring. If the District requires ambient air monitoring, the test method(s) listed in Subsection D.2 of this rule must be employed.
  - b) To demonstrate compliance using dispersion modeling, the annual 99<sup>th</sup> percentile daily maximum at each receptor is determined from model results as follows: for each year of meteorological data modeled, select from each day the maximum hourly modeled SO<sub>2</sub> concentration value and sort all these daily maximum hourly values by descending value. The 99<sup>th</sup> percentile is the 4<sup>th</sup> highest value for each modeled year. Calculate the average of the 99<sup>th</sup> percentile values for three consecutive years of modeling data for each receptor. Compliance is demonstrated if this average value is less than or equal to the design value concentration limit in Subsection B.2.a of this Rule at each receptor.
  - c) Compliance with the limit in subsection B.2.a may also be demonstrated using EPA-approved screen models. Compliance is demonstrated if the 1-hour SO<sub>2</sub>

ground or sea level concentration does not exceed 0.075 ppm (Vol) at or beyond the property line.

- d) If ambient air monitoring data is used to demonstrate compliance, the design value must be calculated in accordance with 40 CFR Part 50 Appendix T – Interpretation of the Primary National Ambient Air Quality Standards for Oxides of Sulfur (Sulfur Dioxide).
3. Permittee shall maintain a representative fuel analysis or exhaust analysis, along with modeling data or other demonstration to ensure that compliance with Rule 54 is being maintained. This analysis and compliance demonstration shall be provided to the District upon request.
  4. Upon District request, ground or sea level concentrations of SO<sub>2</sub> shall be determined by Bay Area Air Quality Management District Manual of Procedures, Volume VI, Section 1, Ground Level Monitoring for Hydrogen Sulfide and Sulfur Dioxide (July 20, 1994) with the following amendments:
    - a. The wind direction shall be continuously measured and recorded to within 5 degrees of arc, and wind speed shall be continuously measured and recorded to within 0.25 miles per hour (mph) at wind speeds less than 25 mph and with a threshold no greater than 0.2 mph.
    - b. The meteorological instruments and siting requirements shall comply with the guidelines in "Quality Assurance Handbook for Air Pollution Measurements Systems, Volume IV, Meteorological Measurements Version 2.0," EPA-454/B-08-002, March 2008.
    - c. The gas standards shall be restandardized against the reference wet chemical method at a minimum of once every 12 months, or be standardized using National Institute of Standards and Technology (NIST) standard gases.

M:\TITLEV\Attachments updated\54B2 (01-14-14).docx

**Ventura County Air Pollution Control District**  
**Rule 55 Applicable Requirements**  
**Fugitive Dust**

**Rule 55, "Fugitive Dust"**  
**Adopted 06/10/08, District-Enforceable**

This permit attachment will become federally enforceable when Rule 55 is approved by EPA as part of the SIP.

**Applicability:**

This attachment applies to any operation, disturbed surface area, or man-made condition at this stationary source that is capable of generating dust. These operations may include bulk material handling, earth-moving, construction, demolition, storage piles, unpaved roads, track-out, or off-field agricultural operations.

All definitions listed in Section H of Rule 55 are applicable to this attachment. The Rule 55 definition section includes the following definitions: "disturbed surface area," "bulk material," "earth moving activities," "construction/demolition activities," "storage piles," "paved road," "track-out," and "off-field agricultural operations." All exemptions listed in Section D of Rule 55 are applicable to this attachment.

**Conditions:**

1. Pursuant to Rule 55.B.1, the permittee shall not cause or allow the emissions of fugitive dust from any applicable source such that the dust remains visible beyond the midpoint (width) of a public street or road adjacent to the property line of the emission source or beyond 50 feet from the property line if there is not an adjacent public street or road.
2. Pursuant to Rule 55.B.2, the Permittee shall not cause or allow the emissions of fugitive dust from any applicable source such that the dust causes 20 percent opacity or greater during each observation and the total duration of such observations (not necessarily consecutive) is a cumulative 3 minutes or more in any one (1) hour. Only opacity readings from a single source shall be included in the cumulative total used to determine compliance. Compliance with the opacity limit shall be determined by using EPA Method 9 with the modifications listed in Section F of Rule 55.
3. Pursuant to Rule 55.B.3, the permittee shall not allow track-out to extend 25 feet or more in length unless at least one of the following three control measures is utilized: track-out area improvement, track-out prevention, or track-out removal. These control measures are detailed in Rule 55.B.3.a.

4. Pursuant to Rule 55.B.3.b, notwithstanding other track-out requirements, all track-out shall be removed at the conclusion of each workday or evening shift subject to the conditions listed in Section 55.B.3.b.
5. Pursuant to Rule 55.C, the permittee shall comply with the specific activity requirements detailed in Section C of Rule 55, for earth-moving, bulk material handling, and truck hauling activities, as applicable.
6. The permittee shall comply with the specific recordkeeping requirements listed in Section E of Rule 55, as applicable.
7. On an annual basis, the permittee shall certify that all applicable sources of dust at this stationary source are operating in compliance with Rule 55. The permittee may also certify annually that there are no operations, disturbed surface areas, or man-made conditions at this stationary source that are subject to Rule 55.

M:\TITLEV\Attachments updated\55 (08-02-18).docx

**Ventura County Air Pollution Control District**  
**Rule 57.1 Applicable Requirements**  
**Particulate Matter Emissions from Fuel Burning Equipment**

**Rule 57.1, "Particulate Matter Emissions from Fuel Burning Equipment"**  
**Adopted 01/11/05, Federally-Enforceable**

**Applicability:**

This attachment applies to fuel burning equipment such as boilers, steam generators, process heaters, water heaters, space heaters, flares, and gas turbines. This attachment does not apply to internal combustion engines, jet engine test stands and rocket engine test stands, and rocket propellant testing devices and rocket fuel testing devices. This attachment also does not apply to exhaust gas streams containing particulate matter that was not generated by the combustion of fuel; such exhaust gas streams are subject to Rule 52 and Rule 53.

**Conditions:**

1. Pursuant to Section B of Rule 57.1, emissions of particulate matter shall not exceed 0.12 pounds per million BTU of fuel input.

Particulate matter is defined as any material, except uncombined water, that exists in a finely divided form as a liquid or solid at standard conditions. Standard conditions are: a gas temperature of 68 degrees Fahrenheit (20 degrees Celsius) and a gas pressure of 14.7 pounds per square inch (760 mm. Hg) absolute.

2. Upon request of the District Compliance Division, compliance shall be determined by independent source test using CARB Method 5. The total particulate catch shall include the filter catch, probe catch, impinger catch, and the solvent extract, as specified in CARB Method 5. Any other appropriate test method may be used with prior written approval by the District, the California Air Resources Board, and the U.S. Environmental Protection Agency.
3. Periodic monitoring is not necessary to certify compliance with Rule 57.1. To certify compliance, a reference to the Rule 57.B District analysis dated December 3, 1997 is sufficient.

M:\TITLEV\Attachments updated\57.1 (01-11-05).docx



**Ventura County Air Pollution Control District**  
**Rule 64 Applicable Requirements**  
**Sulfur Content of Fuels - Gaseous Fuel Requirements**

**Rule 64, "Sulfur Content of Fuels"**  
**Adopted 04/13/99, Federally-Enforceable**

**Applicability:**

This attachment applies to all combustion emissions units at this stationary source while the emissions units are combusting gaseous fuels. Rule 64 shall not apply to any flare gas combustion, where no useful energy is produced and which is subject to Rule 54, "Sulfur Compounds."

**Conditions:**

1. Pursuant to Rule 64, no person shall burn at any time gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel (788 ppmv), calculated as hydrogen sulfide at standard conditions, unless specifically exempted by Rule 64.
2. If only Public Utilities Commission-regulated natural gas, propane, or butane is combusted at this facility, it will be assumed that the permittee is complying with Rule 64 without additional periodic monitoring requirements. Any person claiming this exemption shall maintain records sufficient to substantiate the use of these fuels.
3. If other than Public Utilities Commission-regulated natural gas, propane, or butane is being combusted, the permittee shall analyze the sulfur content of the fuel on an annual basis using South Coast AQMD Method 307-94 - Determination of Sulfur in a Gaseous Matrix or by ASTM D1072-90 (1994), Standard Test Method for Total Sulfur in Fuel Gases.

Alternatively, when measuring the sulfur content of landfill or oilfield gaseous fuel, permittee may use the colorimetric method ASTM D 4810-88 (Reapproved 1994) or the ASTM D4084-94 (Lead Acetate Reaction Rate Method) and may assume that the hydrogen sulfide content of the fuel gas adequately represents the total sulfur content. However, if the sulfur content as measured by ASTM D4810-88 or ASTM D4084-94 equals or exceeds 200 ppmv, then only South Coast AQMD Method 307-94 or ASTM D1072-90 (1994) shall be used to determine compliance.

The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis may be used subject to the verification of the dilution ratio.

Permittee may use the colormetric method ASTM D 4810-88 (Reapproved 1994) for the measurement of the sulfur content of gaseous fuels other than landfill or oilfield gas only if written approval has been granted by the District and by US EPA.

4. Monitoring of the sulfur content of landfill or oilfield gaseous fuel by the permittee shall be at least quarterly if any of the following conditions apply:
  - a. Any sulfur measurement exceeds 394 ppmv, calculated as hydrogen sulfide at standard conditions.
  - b. A stationary source is new.
  - c. The permittee has not reported historical measurements of hydrogen sulfide of the landfill or oilfield gaseous fuel performed within the previous three years in writing to the District for a stationary source.

An operator may have the sulfur content of landfill or oilfield gaseous fuel monitored annually only, instead of quarterly, by satisfying the following provisions:

- a. During four consecutive calendar quarters, each sulfur content measurement shall not exceed 394 ppmv, calculated as hydrogen sulfide at standard conditions, and
- b. Submit a written request to the District for a reduction in monitoring frequency. This request shall contain backup documentation including monitoring reports that document the above provision. Requests for a reduction in monitoring frequency are not effective until written approval by the District is received by the operator.

This annual fuel analysis, and the quarterly analyses if applicable, shall be maintained at the facility and a copy of the annual analysis shall be provided to the District with the annual compliance certification.

**Ventura County Air Pollution Control District  
Rule 64 Applicable Requirements  
Sulfur Content of Fuels - Liquid Fuel Requirements**

**Rule 64, "Sulfur Content of Fuels"  
Adopted 04/13/99, Federally-Enforceable**

**Applicability:**

This attachment applies to all combustion emissions units at this stationary source while the emissions units are combusting liquid fuels. This attachment does not apply to any combustion emission unit with sulfur emission controls.

**Conditions:**

1. Pursuant to Rule 64, no person shall burn any liquid fuels with a sulfur content in excess of 0.5 percent, by weight, unless specifically exempted by Rule 64.
2. If only ARB-quality reformulated gasoline or ARB-certified diesel fuel is combusted at this facility, it will be assumed that the permittee is complying with Rule 64 without additional periodic monitoring requirements. Any person claiming this exemption shall maintain records sufficient to substantiate the use of these fuels.
3. If other than ARB-quality reformulated gasoline or ARB-certified diesel fuel is being combusted, for each liquid fuel delivery permittee shall either obtain the fuel supplier's certification, or shall test the sulfur content of the fuel using ASTM Method D4294-98 or D2622-98, to ensure that compliance with Rule 64 is being maintained. For liquid fuels, operators of electric power generation units may use the sampling and analysis methods prescribed in Code of Federal Regulations 40CFR Part 75 Appendix D.2.2. The fuel supplier's certification may be provided once for each purchase lot, if records are kept of the purchase lot number of each delivery.

The fuel sulfur content by weight data shall be maintained at the facility and shall be provided with the annual compliance certification.

M:\TITLEV\Attachments updated\64B2(4-13-99).docx

**Ventura County Air Pollution Control District**  
**Rule 74.6 Applicable Requirements**  
**Surface Cleaning and Degreasing**

**Rule 74.6, "Surface Cleaning and Degreasing"**  
**Adopted 11/11/03, Federally-Enforceable**

**Applicability:**

This attachment applies to all solvent cleaning activities at this stationary source, except those activities listed in Condition No. 11 that are exempt pursuant to Section E of Rule 74.6. This attachment does not apply to substrate surface preparation regulated by other APCD surface coating, adhesive, ink, resin, and solvent rules. "Solvent" is defined as any ROC-containing liquid used to perform solvent cleaning. "Solvent cleaning" is defined as the use of organic solvent to remove loosely held uncured adhesives, uncured inks, uncured coatings, uncured resins, and other contaminants which include, but are not limited to, dirt, soil, lubricants, coolant, moisture, grease, and fingerprints, from parts, tools, machinery, equipment, and general work areas.

This attachment also contains requirements, pursuant to Rule 74.6, for cold cleaners. A cold cleaner is defined in Rule 74.6 as any batch operated equipment designed to contain liquid solvent that is operated below the solvent's boiling point to carry out solvent cleaning operations. A specific type of cold cleaner is a "remote reservoir cold cleaner" which is a device in which solvent is moved through a sink-like work area for cleaning parts and drains immediately, without forming a pool, through a single drain hole less than 100 square centimeters (15.5 square inches) in area into an enclosed container that is not accessible for soaking parts. The freeboard height for remote reservoir cold cleaners is the distance from the top of the solvent drain to the top of the tank.

This attachment does not apply to solvent cleaning where an emission control system is used pursuant to Rule 74.6.B.5 or where an alternative cleaning system is used pursuant to Rule 74.6.B.6. Pursuant to APCD Rule 23.F.7, solvents used by the permittee for facility, ground, and building maintenance and repair are exempt from the requirement to have a permit. However, unless exempted by Rule 74.6.E, such solvents are required to comply with Rule 74.6.

**Conditions:**

1. Pursuant to Rule 74.6.B.1, no person shall perform solvent cleaning using solvent that exceeds the following limits:
  - a. Solvents used for application equipment cleanup, and all other cleanup of uncured coatings, adhesives, inks, or resins, shall not exceed an ROC content of 900 grams per liter and an ROC composite partial pressure of 33 mmHg at 20°C, as applied.

- b. Solvents used for cleaning of electronic components, electrical apparatus components, medical devices, or aerospace components shall not exceed an ROC content of 900 grams per liter and an ROC composite partial pressure of 33 mmHg at 20°C, as applied.
    - c. Solvents used for cleaning for purposes other than those listed in (a) and (b) above shall not exceed an ROC content of 25 grams per liter, as applied.
  2. Pursuant to Rule 74.6.B.2, no person shall perform solvent cleaning using a solvent with an ROC content greater than 25 grams per liter unless one of the following cleaning devices or methods is used:
    - a. Wipe cleaning where solvent is dispensed to wipe cleaning materials from containers that are kept closed to prevent evaporation, except while dispensing solvent or replenishing the solvent supply;
    - b. Non-atomized solvent flow, dip, or flush method where pooling on surfaces being cleaned is prevented or drained, and all solvent runoff is collected in a manner that enables solvent recovery or disposal. The collection system shall be kept closed to prevent evaporation except while collecting solvent runoff or emptying the collection system;  
  
If the cleaning method has a solvent capacity more than one gallon, a cold cleaner or remote reservoir cold cleaner meeting the equipment and operating requirements of Condition Nos. 8, 9, and 10 of this attachment (Sections C and D of Rule 74.6) shall be used to comply with this requirement.
    - c. Application of solvent from a hand held spray bottle, squirt bottle or other closed container with a capacity of one liter or less;
    - d. A properly used enclosed gun washer or low emission spray gun cleaner.
  3. Pursuant to Rule 74.6.B.3.a, no person shall allow liquid cleaning solvent to leak from any equipment or container.
  4. Pursuant to Rule 74.6.B.3.b, no person shall specify, solicit, supply, or require any cleaning solvent or solvent cleaning equipment intended for uses governed by Rule 74.6 if such use would violate Rule 74.6. This prohibition applies to all written and oral contracts under which solvent cleaning operations subject to Rule 74.6 are to be conducted at any location in Ventura County.
  5. Pursuant to Rule 74.6.B.3.c, no person shall use more than one gallon per week of

solvents containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, or chloroform, or any combination of these solvents, in a total concentration greater than 5 percent by weight, for cold cleaning except in a cold cleaner operated in accordance with National Emission Standards for Halogenated Solvent Cleaning, 40 CFR Parts 9 and 63, Subpart T, Sections 63.460 through 63.469 (Degreasing MACT Standards). Any person that uses the above solvent in quantities less than one gallon per week shall maintain records of the volume and formulation of such solvent on an as-used basis (recording use each day such material is used). Records shall be saved for at least five (5) years from the date of each record and shall be made available to District personnel upon request.

6. Pursuant to Rule 74.6.B.4.a, all ROC-containing solvents shall be stored in non-absorbent, non-leaking containers that shall be kept closed at all times except when filling or emptying.
7. Pursuant to Rule 74.6.B.4.b, waste solvent and waste solvent residues shall be disposed of in a manner conforming with Division 20, Chapter 6.5 of the California Health and Safety Code.
8. Pursuant to Rule 74.6.C.1, all cold cleaners, except remote reservoir cold cleaners, shall be equipped with the following devices:
  - a. A drying rack suspended above the solvent, or other facility for draining cleaned parts such that the drained solvent is returned to the cleaner.
  - b. A cover that prevents the solvent from evaporating when not processing work in the cleaner. If high volatility solvent is used, the cover must be a sliding, rolling, or guillotine (bi-parting) type that is designed to easily open and close, or it must be designed to be easily operated with one hand. A high volatility solvent is an unheated solvent with an ROC composite partial pressure of greater than 2 mmHg @ 20°C.
  - c. A freeboard height of at least 6 inches (15.2 centimeters), if low volatility solvent is used. A low volatility solvent is an unheated solvent with an ROC composite partial pressure of 2 mmHg or less @ 20°C.
  - d. At least one of the following control devices, if high volatility solvent is used:
    1. A freeboard height such that the freeboard ratio is at least 0.75.
    2. A water cover if the solvent is insoluble in and heavier than water.
  - e. A permanent conspicuous mark locating the maximum allowable solvent level that conforms with the applicable freeboard height requirement in Condition No. 8.c or 8.d.1.

- f. A permanent conspicuous label or sign summarizing the applicable operating requirements appropriate for cold cleaning operations.
9. Pursuant to Rule 74.6.C.2, remote reservoir cold cleaners shall be equipped with the following devices:
  - a. A permanent conspicuous label or sign summarizing the applicable operating requirements appropriate for cold cleaning operations.
  - b. A sink-like work area that is sloped sufficiently towards the drain to preclude pooling of solvent.
  - c. A single drain hole, less than 100 square centimeters (15.5 square inches) in area, for the solvent to flow from the sink into the enclosed reservoir.
  - d. A freeboard height of at least 6 inches (15.2 centimeters).
  - e. A cover for the drain when no work is being processed in the cleaner and high volatility solvent is used. If low volatility solvent is used, a cover is not required.
10. Pursuant to Rule 74.6.D, any person who operates a cold cleaner shall conform to the following operating requirements:
  - a. The operator shall drain cleaned parts of all solvent until dripping ceases to ensure that the drained solvent is returned to the cleaner.
  - b. Solvent agitation, where necessary, shall be achieved using pump recirculation, a mixer, or ultrasonics. Air agitation shall not be used.
  - c. If a solvent flow is utilized, only a solid fluid stream (not a fine, atomized, or shower type spray) shall be used.
  - d. The pressure of the solvent flow system shall be such that liquid solvent does not splash outside the container.
  - e. No person shall remove or open any required device designed to cover the solvent unless work is being processed in the cleaner or maintenance is being performed on the cleaner.
  - f. The cleaning equipment and emission control equipment shall be operated and maintained in proper working order.
  - g. The cleaning of porous or absorbent materials such as cloth, leather, wood, or rope is prohibited. This provision shall not apply to paper gaskets or paper filters.
11. Pursuant to Rule 74.6.E.1, Rule 74.6 (all requirements of this permit attachment) shall not

apply to:

- a. Cleaning activities using Clean Air Solvent, or a solvent with an ROC-content no more than 25 grams per liter as applied. A "Clean Air Solvent" is a solvent certified by the South Coast Air Quality Management District as a Clean Air Solvent.
  - b. The use of up to 160 fluid ounces of non-refillable aerosol cleaning products per day, per facility.
  - c. Janitorial cleaning including graffiti removal.
  - d. Cleaning carried out in vapor degreasers or motion picture film cleaning equipment.
  - e. Any cleaning device or mechanism regulated by National Emission Standards for Halogenated Solvent Cleaning, 40 CFR Parts 9 and 63, Subpart T, Sections 63.460 through 63.469 (Degreasing MACT Standards).
  - f. Cleaning operations subject to any of the following rules:
    - Rule 74.3, Paper, Fabric and Film Coating Operations
    - Rule 74.5.1, Petroleum Solvent Dry Cleaning
    - Rule 74.5.2, Synthetic Solvent Dry Cleaning
    - Rule 74.19, Graphic Arts Operations
    - Rule 74.19.1, Screen Printing Operations
    - Rule 74.21, Semiconductor Manufacturing
  - g. Stripping of cured coating (e.g.; stripping), cured adhesive (e.g.; debonding, ungluing), cured ink, or cured resin.
  - h. The use of solvent for purposes other than solvent cleaning activities.
12. Pursuant to Rule 74.6.E.2, Rule 74.6.B.1 (Condition No. 1 of this attachment) shall not apply to:
- a. Cleaning operations required to comply with any ROC content and/or composite vapor pressure limit in any of the following rules:
    - Rule 74.12, Surface Coating of Metal Parts and Products
    - Rule 74.13, Aerospace Assembly and Component Manufacturing Operations
    - Rule 74.14, Polyester Resin Material Operations
    - Rule 74.18, Motor Vehicle and Mobile Equipment Coating Operations
    - Rule 74.20, Adhesives and Sealants
    - Rule 74.24, Marine Coating Operations



Rule 74.24.1, Pleasure Craft Coating Operations  
Rule 74.30, Wood Products Coatings

- b. Cleaning of ultraviolet lamps used to cure ultraviolet inks coatings, adhesives or resins.
- c. Cleaning of solar cells, laser hardware, scientific instruments, or high-precision optics.
- d. Cleaning conducted in laboratory tests and analyses including quality assurance/quality control applications, or bench scale or short-term (less than 2 years) research and development programs.
- e. Removal of elemental sodium from the inside of pipes and lines.
- f. Cleaning of mold release compounds from molds.
- g. Cleaning of tools used to cut or abrade cured magnetic oxide coatings.
- h. Cleaning of aerospace assembly and subassembly surfaces that are exposed to strong oxidizers or reducers such as nitrogen tetroxide, liquid oxygen or hydrazine.
- i. Cleaning of paper gaskets.
- j. Cleaning of clutch assemblies where rubber is bonded to metal by means of an adhesive.
- k. Cleaning of hydraulic actuating fluid from filters and filter housings.
- l. Removal of explosive materials and constituents from equipment associated with manufacturing, testing or developing explosives.
- m. Manufacturing cleaning of nuts and bolts designed for automotive racing applications, in a cold cleaner complying with Sections C and D of Rule 74.6 using solvent with an ROC content no more than 900 grams per liter and a ROC composite partial pressure no more than 5 mm Hg @ 20C.
- n. Cleaning of precision-lapped mechanical seals in pumps that handle liquefied gasses, in a cold cleaner complying with Sections C and D of Rule 74.6 using solvent with an ROC content no more than 900 grams per liter and a ROC composite partial pressure no more than 5 mm Hg @ 20C.
- o. Facility wide use of less than 1 gallon per week of non-compliant solvent where compliant solvents are not available. Any person claiming this exemption shall

maintain records of the volume and formulation of non-compliant solvent used on an as-used basis (recording use each day such material is used). Records shall be saved for at least five (5) years from the date of each record and shall be made available to District personnel upon request.

13. Pursuant to Rule 74.6.E.3, Rule 74.6 Sections B.1 and B.2 (Condition Nos. 1 and 2 of this attachment) shall not apply to aircraft engine gas path cleaning or stationary gas turbine gas path cleaning using solvent with an ROC content of 200 g/l or less, as applied.
14. Pursuant to Rule 74.6.F, the permittee shall maintain a current material list showing each ROC containing material used in solvent cleaning activities. The list shall summarize the following information:
  - a. Solvent name and manufacturer's description.
  - b. All intended uses of the solvent at the facility, classified as follows:
    1. Cleanup, including application equipment cleaning, or
    2. Cleaning of electronic components, electrical apparatus components, medical devices, or aerospace components, or
    3. Solvent used pursuant to an exemption in Rule 74.6.E (specify the exemption claimed).
  - c. The ROC content in units of grams per liter of material (and ROC composite partial pressure in units of mm Hg @ 20C, if applicable) of the solvent.
  - d. If the solvent is a mix of materials blended by the operator, a record of the mix ratio.

This information shall be made available to District personnel upon request.

15. Permittee shall maintain the above records and shall monitor each applicable solvent cleaning activity to ensure that compliance with Rule 74.6 is being maintained. Upon request of the District, compliance with Rule 74.6 shall be determined using the following methods:
  - a. Pursuant to Rule 74.6.G.1, the ROC content of materials shall be determined by EPA Test Method 24 (40 CFR Part 60, Appendix A).
  - b. Pursuant to Rule 74.6.G.4, the identity of components in solvents shall be determined using manufacturer's formulation data or by using ASTM E168-67, ASTM E169-87, or ASTM E260-85.

- c. Pursuant to Rule 74.6.G.5, ROC composite partial pressure of a solvent shall be calculated using a widely accepted published source such as: Boublik, T., V. Fried and E. Hala, "The Vapor Pressure of Pure Substances," Elsevier Scientific Publishing Co., New York (1973), Perry's Chemical Engineers Handbook, McGraw-Hill Book Company, CRC Handbook of Chemistry and Physics, Chemical Rubber Publishing Company (1986-1987), and Lange's Handbook of Chemistry, John A. Dean, editor, McGraw-Hill Book Company (1985). The true vapor pressure of a component in a solvent mix may be determined by ASTM Method D2879-86. The ROC composite partial pressure of a solvent mix consisting entirely of ROC may be determined by ASTM Method D2879-86.
- d. Pursuant to Rule 74.6.G.6, the active and passive solvent losses from spray gun cleaning systems shall be determined using South Coast Air Quality Management District's "General Test Method for Determining Solvent Losses from Spray Gun Cleaning Systems" dated October 3, 1989. The test solvent for this determination shall be any lacquer thinner with a minimum vapor pressure of 105 mm Hg at 20°C. The minimum test temperature shall be 15°C.
- e. Pursuant to Rule 74.6.G.7, initial boiling point of solvent shall be determined by ASTM 1078-78 or by using a published source such as listed in Rule 74.6.G.5.

M:\TITLEV\Attachments updated\746 (12-07-17).docx

**Ventura County Air Pollution Control District**  
**Rule 74.11.1 Applicable Requirements**  
**Rule 74.11.1, Large Water Heaters and Small Boilers**

**Rule 74.11.1, "Large Water Heaters and Small Boilers"**  
**Adopted 09/11/12, Federally Enforceable**

**Applicability:**

This attachment applies to all natural gas-fired water heaters, boilers, steam generators or process heaters (units) with a rated heat input capacity greater than or equal to 75,000 BTU/hr and less than 1,000,000 BTU/hr at this stationary source installed after January 1, 2013 and to the future installation of any such unit at this stationary source. Note that units rated less than 1,000,000 BTU/hr are exempt from District permit requirements pursuant to Rule 23.C.1.

**Conditions:**

1. Pursuant to Rule 74.11.1.B.2, no person shall sell, offer for sale, or install in Ventura County any new unit with a rated heat input capacity of greater than or equal to 75,000 BTU/hr and less than or equal to 400,000 BTU/hr that does not meet the following criteria:
  - a. Oxides of nitrogen emissions shall not exceed 14 nanograms per joule of heat output (32.5 pounds per billion BTU), or 20 parts per million, and
  - b. The unit is certified in accordance with Rule 74.11.1.C.

The oxides of nitrogen emission standard required above (Condition No. 1.a) does not apply to units specifically designed to heat swimming pools, hot tubs, or spas. For such units, oxides of nitrogen emissions shall not exceed 40 nanograms per joule of heat output (93 pounds per billion BTU), or 55 parts per million.

2. Pursuant to Rule 74.11.1.B.4, no person shall sell, offer for sale, or install in Ventura County any new unit with a rated heat input capacity of greater than 400,000 BTU/hr and less than 1,000,000 BTU/hr that does not meet the following criteria:
  - a. Oxides of nitrogen emissions shall not exceed 20 parts per million and carbon monoxide emissions shall not exceed 400 parts per million, and
  - b. The unit is certified in accordance with Rule 74.11.1.C.
3. The permittee shall maintain a listing of manufacturer, brand name, model number, heat input rating, and installation date for each water heater, boiler, steam generator and

process heater, with a rated heat input capacity greater than or equal to 75,000 BTU/hr and less than 1,000,000 BTU/hr, at this stationary source. Permittee shall submit these identification records for all of these units to the District upon request.

4. On an annual basis, the permittee shall certify that all water heaters, boilers, steam generators and process heaters, with a rated heat input capacity greater than or equal to 75,000 BTU/hr and less than 1,000,000 BTU/hr, at this stationary source are complying with Rule 74.11.1. This annual certification shall include a formal survey identifying each unit and documentation of certification status (pursuant to Rule 74.11.1.C), as required.

M:\TITLEV\Attachments updated\7411.1 (9-11-12).docx

**Ventura County Air Pollution Control District**  
**Rule 74.22 Applicable Requirements**  
**Rule 74.22, Natural Gas-Fired Fan-Type Central Furnaces**

**Rule 74.22, "Natural Gas-Fired Fan-Type Central Furnaces"**  
**Adopted 11/09/93, Federally-Enforceable**

**Applicability:**

This attachment applies to all natural gas-fired, fan-type central furnaces at this stationary source installed after May 31, 1994 and to the future installation of any natural gas-fired, fan-type central furnaces at this stationary source. A fan-type central furnace is a self contained space heater providing for circulation of heated air at pressures other than atmospheric through ducts of more than 10 inches in length that has a rated heat input capacity of less than 175,000 BTU per hour and, for combination heating and cooling units, a rated cooling capacity of less than 65,000 BTU per hour. Natural gas-fired, fan-type central furnaces installed in manufactured housing (mobile homes) are exempt from Rule 74.22.

**Conditions:**

1. Pursuant to Rule 74.22.B, no person shall install, after May 31, 1994, any natural gas-fired fan-type central furnace:
  - a. with NO<sub>x</sub> (oxides of nitrogen) emissions in excess of 40 nanograms per joule of heat output. (74.22.B.1)
  - b. unless it is certified and identified in accordance with Section C of Rule 74.22. (74.22.B.2)
2. Permittee shall maintain a listing of manufacturer, brand name, model number, and heat input rating for each natural gas-fired fan-type central furnace at this stationary source. Permittee shall submit these identification records for all of these furnaces to the District upon request.
3. On an annual basis, permittee shall certify that all natural gas-fired fan-type central furnaces at this stationary source are complying with Rule 74.22. This annual certification shall include a formal survey identifying each natural gas-fired fan-type central furnace; whether it was installed before or after May 31, 1994; and for those furnaces installed after May 31, 1994, information indicating that the certification is contained on the furnace nameplate, or that the furnace is included on a District-provided list of certified furnaces.

## 9. GENERAL REQUIREMENTS FOR SHORT-TERM ACTIVITIES (ATTACHMENTS)

The general requirements for short-term activities are broadly applicable requirements that apply to temporary activities at the facility (e.g., abrasive blasting, architectural coatings, degassing operations, etc.). These are activities occurring infrequently and for a short duration.

Requirements for short-term activities can normally be adequately addressed in the permit application with minimal or no reference to any specific emissions unit, provided that the scope of the requirement and the manner of its enforcement are clear.

As detailed in the Title V Permit Reissuance Application, general applicable requirements for short-term activities that apply to this facility were determined. The permit conditions associated with each requirement for a short-term activity are listed in an individual attachment. The attachment is identified with the label "Attachment (APCD Rule No. ) \_\_\_\_" or "Attachment 40CFR61.M" in the lower left corner of each attachment.

**Ventura County Air Pollution Control District**  
**Rule 74.1 Applicable Requirements**  
**Abrasive Blasting**

**Rule 74.1, "Abrasive Blasting"**  
**Adopted 11/12/91, Federally-Enforceable**

**Applicability:**

This attachment applies to short term activities involving any abrasive blasting operation conducted at this facility. Abrasive blasting is the operation of cleaning or preparing a surface by forcibly propelling a stream of abrasive material against that surface. Abrasive materials subject to Rule 74.1 include, but are not limited to, sand, slag, steel shot, garnet or walnut shells.

**Conditions:**

1. Pursuant to Rule 74.1.B.1.a, all abrasive blasting operations shall be conducted within a permanent building, except for abrasive blasting operations conducted under one or more of the following conditions as detailed in Rule 74.1.B.1.b:
  - a. Steel or iron shot/grit is used exclusively
  - b. The item to be blasted exceeds eight feet in any dimension
  - c. The surface being blasted is situated at its permanent location or no further away from its permanent location than is necessary to allow the surface to be blasted
2. Pursuant to Rule 74.1.B.1.c, any abrasive blasting that is allowed to be conducted outside of a permanent building, and is not exclusively using steel or iron shot/grit, must use one of the following:
  - a. Wet abrasive blasting
  - b. Hydroblasting
  - c. Vacuum blasting
  - d. Dry blasting with California ARB certified abrasives
3. Abrasive blasting for pavement marking shall comply with the requirements of Rule 74.1.B.2.



4. Abrasive blasting of stucco and concrete shall comply with the requirements of Rule 74.1.B.3.
5. Packages or containers for abrasives certified in accordance with Section 92530 of the California Code of Regulations used for permissible outdoor blasting shall comply with the labeling requirements of Rule 74.1.B.4.
6. Abrasive blasting operations shall comply with the visible emission standards of Rule 74.1.C.1 and the nuisance prohibition of Rule 74.1.C.2. The visible emission evaluation of abrasive blasting operations shall be conducted in accordance with Section 92400 of the California Code of Regulations.
7. Permittee shall monitor each abrasive blasting operation to ensure that compliance with Rule 74.1 is being maintained. For each abrasive blasting operation conducted at the facility, permittee shall maintain records of the following information:
  - a. Date of operation
  - b. Type of abrasive blasting media used
  - c. Identity, size, and location of item blasted
  - d. Whether operation was conducted inside or outside a permanent building
  - e. California ARB certifications for abrasives used

These records shall be maintained at the facility and submitted to the District upon request.

M:\TITLEV\Attachments updated\741 (12-07-2017).docx

**Ventura County Air Pollution Control District**  
**Rule 74.2 Applicable Requirements**  
**Architectural Coatings**

**Rule 74.2, "Architectural Coatings"**  
**Adopted 01/12/10, Federally-Enforceable**

**Applicability:**

This attachment applies to short term activities involving any person who supplies, sells, offers for sale, applies or solicits the application of any architectural coating at this stationary source. An architectural coating is a coating to be applied to stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs. Coatings applied in shop applications or to nonstationary structures, such as airplanes, ships, boats, railcars and automobiles, are not considered to be architectural coatings for the purposes of this rule, nor are adhesives.

This attachment and Rule 74.2 do not apply to architectural coatings that are sold in a container with a volume of one liter (1.057 quart) or less and do not apply to any aerosol coating product.

**Conditions:**

1. Pursuant to Rule 74.2.B.1, the volatile organic compound (VOC) content of architectural coatings shall not exceed the following standards, as found in Table 2 of Rule 74.2.B.1, unless specifically exempted by Rule 74.2:
  - a. The VOC content of flat coatings shall not exceed 50 grams per liter of coating.
  - b. The VOC content of nonflat coatings shall not exceed 100 grams per liter of coating.
  - c. The VOC content of nonflat-high gloss coatings shall not exceed 150 grams per liter of coating.

Limits are expressed as VOC Regulatory (unless otherwise specified in Rule 74.2) thinned to the manufacturer's maximum recommendation, excluding colorant added to the tint bases. VOC Regulatory is defined in Rule 74.2.

2. Pursuant to Rule 74.2.B.1, the VOC content of specialty architectural coatings shall not exceed the VOC limits in the Table of Standards in Rule 74.2, unless specifically exempted by Rule 74.2.

Specifically, the VOC content of industrial maintenance coatings shall not exceed 250 grams per liter of coating.

Limits are expressed as VOC Regulatory (unless otherwise specified in Rule 74.2) thinned to the manufacturer's maximum recommendation, excluding colorant added to the tint bases. VOC Regulatory is defined in Rule 74.2.

3. Pursuant to Rule 74.2.B.4, all architectural coating containers used to apply the contents therein to a surface directly from the container by pouring, siphoning, brushing, rolling, padding, ragging or other means, shall be closed when not in use. These architectural coating containers include, but are not limited to, drums, buckets, cans, pails, trays or other application containers. Containers of any VOC-containing materials used for thinning and cleanup shall also be closed when not in use.
4. Pursuant to Rule 74.2.B.5, no person who applies or solicits the application of any architectural coating shall apply or solicit the application of any coating that is thinned to exceed the applicable VOC limit specified in the Tables in Subsection B.1.
5. Permittee shall monitor each architectural coating operation to ensure that compliance with Rule 74.2 is being maintained. Permittee shall specify the usage of compliant coatings and shall maintain VOC records of coatings used at the stationary source. This information shall be submitted to the District upon request.
6. The VOC content of architectural coatings, along with other specified physical and chemical properties, shall be measured using the testing procedures in Rule 74.2.G.

M:\TITLEV\Attachments updated\742 (12-07-2017).docx

**Ventura County Air Pollution Control District**  
**Rule 74.4.D Applicable Requirements**  
**Cutback Asphalt - Road Oils**

**Rule 74.4, "Cutback Asphalt"**  
**Adopted 07/05/83, Federally-Enforceable**

**Applicability:**

This attachment applies to short term activities involving the application of road oils for road, highway or street paving and maintenance. For the purpose of Rule 74.4, road oil shall be synonymous with slow cure asphalt.

**Conditions:**

1. Pursuant to Rule 74.4.D, road oils used for highway or street paving or maintenance applications shall contain no more than 0.5 percent of organic compounds which boil at less than 500°F as determined by ASTM D402.
2. Permittee shall maintain a test report of oil being proposed for usage in order to ensure that compliance with Rule 74.4.D is being maintained. Permittee shall maintain records of oil analyses at the facility and submit these records to the District upon request.

M:\TITLEV\Attachments updated\744D.docx

**Ventura County Air Pollution Control District  
40 CFR Part 61, Subpart M Applicable Requirements  
National Emission Standard for Asbestos**

**40 CFR Part 61, Subpart M, "National Emission Standard for Asbestos"  
Federally-Enforceable**

**Applicability:**

This attachment applies to short term activities conducted at this facility pertaining to procedures for asbestos demolition or renovation activities as detailed in 40 CFR Part 61.145.

As defined in 40 CFR Part 61.141, asbestos means the asbestiform varieties of serpentinite (chrysotile), riebeckite (crocidolite), cummingtonite-grunerite, anthophyllite, and actinolite-tremolite. Renovation means altering a facility or one or more facility components in any way, including the stripping or removal of regulated asbestos containing material (RACM) from a facility component. Operations in which load-supporting structural members are wrecked or taken out are demolitions.

**Conditions:**

1. Permittee shall insure compliance with 40 CFR Part 61 Subpart M, "National Emission Standard for Asbestos." The owner or operator of a demolition or renovation activity, as defined in 40 CFR Part 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR Part 61.145, "Standards for Demolition and Renovation."
2. During times when asbestos renovation or demolition are underway at the facility, permittee shall ensure that all applicable requirements of 40 CFR Part 61.145 are met.

M:\TITLEV\Attachments updated\CFR61M.docx

## 10. GENERAL PERMIT CONDITIONS

This section contains general Part 70 permit conditions and general APCD permit to operate conditions. The general Part 70 permit conditions are associated with general federal requirements that apply to all Title V facilities. These conditions are based on APCD Rules 8, 30, 32, and 33, and 40 CFR Part 70.

The general permit to operate conditions are associated with general District requirements that apply to all operating Title V facilities. These conditions are based on APCD Rules 19, 20, 22, and 27.

M:\TITLEV\Attachments updated\PERMIT10std.docx

**Ventura County Air Pollution Control District**  
**General Part 70 Permit Conditions**

1. The permittee shall comply with all federally-enforceable conditions of the Part 70 permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of an application for reissuance of the permit. (40 CFR 70.6(a)(6)(i), APCD Rule 33.3.B.1)
2. The permittee shall continue to comply with all the applicable requirements with which the company has certified that it is already in compliance. The permittee shall comply in a timely manner with applicable requirements that become effective during the permit term of this permit.
3. The permittee shall promptly report deviations from Part 70 permit requirements, including those attributable to upset conditions as defined in the Part 70 permit, the probable cause of the deviations, and any corrective actions or preventive measures taken. Promptly is defined as no later than four (4) hours after its detection by such owner or operator, or his agents or employees. (40 CFR 70.6(a)(3)(iii)(B), APCD Rule 33.3.A.3, APCD Rule 32.B.1)
4. The need to halt or reduce activity is not a defense. It shall not be a defense for a permittee in an enforcement action that it would be necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Part 70 permit. (40 CFR 70.6(a)(6)(ii), APCD Rule 33.3.B.2)
5. All applicable records, monitoring data, and support information shall be maintained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 permit. All applicable reports shall be submitted to the District every 6 months and shall be certified by a responsible official. Such reports shall identify any deviations from Part 70 permit conditions. (40 CFR 70.6(a)(3)(ii)(B), 40 CFR 70.6(a)(3)(iii)(A), APCD Rule 33.3.A.3)
6. The permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 permit or to determine compliance with the Part 70 permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the Part 70 permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator of the EPA along with a claim of confidentiality. (40 CFR 70.6(a)(6)(v), APCD Rule 33.3.B.5)

7. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the District or an authorized representative to perform the following:
  - a. Enter upon the permittee's premises where a Part 70 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the Part 70 permit;
  - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the Part 70 permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the Part 70 permit; and
  - d. As authorized by the federal Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the Part 70 permit or applicable requirements.

(40 CFR 70.6(c)(2), APCD Rule 8, APCD Rule 33.3.B.7)

8. The Part 70 permit may be modified, revoked, reopened, reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (40 CFR 70.6(a)(6)(iii), APCD Rule 33.3.B.3)
9. A Part 70 permit shall be reopened under the following conditions:
  - a. Additional applicable requirements under the federal Clean Air Act become applicable to the facility with a remaining Part 70 permit term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the Part 70 permit is due to expire, unless the original Part 70 permit or any of its terms and conditions has been extended pursuant to APCD Rule 33.6.D;
  - b. Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator of the EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 permit;



- c. The District or EPA determines that the Part 70 permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 permit; or
- d. The Administrator of the EPA or the District determines that the Part 70 permit must be revised or revoked to assure compliance with the applicable requirements.

(40 CFR 70.7(f), APCD Rule 33.8.A)

- 10. All fees required by District Regulation III, Fees, shall be paid on a timely basis as requested by the District. Notwithstanding the term of the Part 70 permit, if the permittee fails to pay the annual renewal fees required pursuant to APCD Rule 42.H within the time period specified in APCD Rule 30, the Part 70 permit will be void. (40 CFR 70.6(a)(7), APCD Rule 30, APCD Rule 33.3.B.6)
- 11. The Part 70 permit does not convey any property rights of any sort, or any exclusive privilege. (40 CFR 70.6(a)(6)(iv), APCD Rule 33.3.B.4)
- 12. The provisions of this Part 70 permit shall be severable, and in the event of any challenge to any portion of the permit, or if any portion is held invalid, the remaining permit conditions shall remain valid and in force. (40 CFR 70.6(a)(5), APCD Rule 33.3.B.8)
- 13. An application for reissuance of this Part 70 Permit shall be submitted no more than 18 months prior to the expiration date and no less than 6 months prior to the expiration date as stated on this permit. The application shall be subject to the same procedural requirements, including those for public participation and EPA review, that apply to initial Part 70 permit issuance. (40 CFR 70.5(a)(1)(iii), 40 CFR 70.7(c)(1)(i), APCD Rule 33.6.B)
- 14. Any Part 70 application and any document, including reports, schedule of compliance progress reports, and compliance certification, required by this Part 70 permit shall be certified by a responsible official. The certification shall state that, based on information and belief formed after a reasonable inquiry, the statements and information in the document are true, accurate, and complete (40 CFR 70.5(d), APCD Rule 33.9.C)
- 15. Permittee must submit certification of compliance with all applicable requirements and all Part 70 permit conditions. A compliance certification shall be submitted with any Part 70 permit application and annually, on the anniversary date of the Part 70 permit, or on a more frequent schedule if required by an applicable requirement or permit condition.

This compliance certification shall identify each applicable requirement or condition of the Part 70 permit, the compliance status of the stationary source, whether the compliance

was continuous or intermittent since the last certification, and the method(s) used to determine compliance. In addition, the certification shall indicate the stationary source's compliance status with any applicable enhanced monitoring and compliance certification requirement of the federal Clean Air Act. A copy of each compliance certification shall be submitted to EPA Region IX. (40 CFR 70.5(c)(9), 40 CFR 70.6(c)(5), APCD Rule 33.3.A.9, APCD Rule 33.9.B)

M:\TITLEV\Attachments updated\PART70GN (09-26-17).docx

**Ventura County Air Pollution Control District  
General Permit to Operate Conditions**

1. Within 30 days after receipt of a permit to operate, the permittee may petition the Hearing Board, in writing, to review any new or modified condition on the permit. (APCD Rule 22)
2. This permit to operate, or a copy, shall be posted reasonably close to the subject equipment and shall be readily accessible to inspection personnel from the District. Posting a copy of the "Permitted Equipment and Applicable Requirements Table" contained in Section No. 2 will fulfill this requirement if the entire permit to operate is readily available at another location at the stationary source. (APCD Rule 19)
3. This permit to operate is not transferable from one location to another unless the equipment is specifically listed as being portable. (APCD Rule 20)
4. If, within a reasonable amount of time, any permittee refuses to furnish information requested by the District, the District may suspend this permit to operate. The permittee will be informed, in writing, of the permit suspension and the reasons for the suspension. (APCD Rule 27)

M:\TITTLEV\Attachments updated\POGNCN.docx

## 11. MISCELLANEOUS FEDERAL PROGRAM CONDITIONS

This section contains miscellaneous federal program conditions that are not emission unit-specific or short-term. These federal requirements are broadly applicable requirements that apply and are enforced in the same manner for all subject emissions units or short-term activities. Permit conditions associated with these miscellaneous federal program requirements are listed in an individual attachments. The attachment is identified with the label “Attachment 40CFR(Part No.) \_\_” in the lower left corner of each attachment.

M:\TITLEV\Attachments updated\PERMIT11std.docx

**Ventura County Air Pollution Control District  
40 CFR Part 68 Applicable Requirements  
Accidental Release Prevention and Risk Management Plans**

**40 CFR Part 68, "List of Regulated Substances and Thresholds for Accidental Release Prevention"  
Federally-Enforceable**

**Applicability:**

This attachment applies to the regulated substance, anhydrous ammonia (NH<sub>3</sub>), which is contained in a process at this stationary source and which exceeds the threshold quantity of 10,000 pounds, as presented in 40 CFR Part 68.130. This regulation addresses the requirements of section 112(r) of the federal Clean Air Act as amended. Specifically, this attachment applies to this stationary source because the permittee has stated that it is subject to Part 68, as determined under 40 CFR Part 68.10 and 40 CFR Part 68.15 and is therefore required to submit a federal Risk Management Plan (RMP) to the Oxnard Certified Unified Program Agency (Oxnard CUPA). The permittee submitted a federal RMP to the Oxnard CUPA on June 21, 1999.

**Conditions:**

1. Pursuant to 40 CFR Part 68, the permittee shall maintain compliance with the Risk Management Plan for the cogeneration facility as submitted to the Oxnard Certified Unified Program Agency (Oxnard CUPA).
2. The permittee shall review and update the Risk Management Plan as required by 40 CFR Part 68.190.
3. The permittee shall certify compliance with 40 CFR Part 68 as part of the annual compliance certification as required by 40 CFR Part 70.

M:\TITLEV\TV Permits\PO0214\Permit \VCFR68RMP-214-rev151.doc

**Ventura County Air Pollution Control District  
40 CFR Part 82 Applicable Requirements  
Protection of Stratospheric Ozone**

**40 CFR Part 82, "Protection of Stratospheric Ozone"**

**40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners"**

**40 CFR Part 82, Subpart F, "Recycling and Emissions Reduction"**

**Federally-Enforceable**

**Last revised 04/10/15**

**Applicability:**

This attachment applies to activities conducted at this facility that involve producing, importing, exporting, or consuming of the specified controlled substances described under 40 CFR Part 82.4. Specifically, this attachment includes the requirements of 40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners", and 40 CFR Part 82, Subpart F, "Recycling and Emissions Reduction".

As defined in 40 CFR Part 82.30, 40 CFR Part 82, Subpart B applies to any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner.

As defined in 40 CFR Part 82.150, 40 CFR Part 82, Subpart F applies to any person servicing, maintaining or repairing appliances. This subpart also applies to persons disposing of appliances, including small appliances and motor vehicle air conditioners. In addition, this subpart applies to refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, persons selling class I or class II refrigerants or offering class I or class II refrigerants for sale, and persons purchasing class I or class II refrigerants.

As defined in 40 CFR 82.152, appliance means any device which contains and uses a refrigerant and which is used for household or commercial purposes, including any air conditioner, refrigerator, chiller, or freezer. Refrigerant means, for purposes of this subpart, any substance consisting in part or whole of a class I or class II ozone-depleting substance that is used for heat transfer purposes and provides a cooling effect.

**Conditions:**

1. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable

requirements as specified in 40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners".

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

2. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee is subject to all of the applicable requirements as specified in 40 CFR Part 82, Subpart F, "Recycling and Emissions Reduction".

M:\TITLEV\Attachments updated\CFR82 11-8-16.docx

**Ventura County Air Pollution Control District**  
**Permit Shield – Standards of Performance for Stationary Combustion Turbines**  
**40 CFR Part 60, Subpart GG**

**40 CFR Part 60, Subpart GG, “Standards of Performance for Stationary Gas Turbines”**

**Permit Shield:**

The requirements of 40 CFR Part 60, Subpart GG, “Standards of Performance for Stationary Gas Turbines” have been reviewed; and it has been determined that this federal regulation is not applicable to this stationary source. The following discussion details the determination of this permit shield for the GE LM 6000 PC SPRINT Turbine.

**Discussion:**

For stationary combustion turbines with a heat input at peak load equal to or greater than 10 MMBTU/hr which commenced construction, modification, or reconstruction after February 18, 2005, 40 CFR Part 60, Subpart GG, has been superseded by Subpart KKKK. Therefore, Subpart KKKK is applicable to the LM-6000 turbine which replaced the LM-5000 turbine which was previously regulated by Subpart GG. Section 60.4305(b) of Subpart KKKK (NSPS for Stationary Combustion Turbines) states that turbines regulated by Subpart KKKK are exempt from the requirements of Subpart GG.

M:\TITLE\TV Permits\PO0214\Permit V\Shield-60GG PO214-rev191.docx



**Ventura County Air Pollution Control District**  
**Permit Shield – National Emission Standards for Hazardous Air Pollutants**  
**40 CFR Part 63, Subpart YYYYY**

**40 CFR Part 63, Subpart YYYYY, “National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines”**

**Permit Shield:**

The requirements of 40 CFR Part 63, Subpart YYYYY, “National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines” have been reviewed; and it has been determined that this federal regulation is not applicable to this stationary source. The following discussion details the determination of this permit shield for the GE LM 6000 Turbine. The unit is fired on natural gas only.

**Discussion:**

40 CFR Part 63, Subpart YYYYY, is applicable to stationary combustion turbines that operate at a major source of HAP (Hazardous Air Pollutant) emissions. A stationary source is a major source of HAP emissions when the HAP emissions exceed thresholds of 10 tons per year of a single HAP or 25 tons per year of combined HAPs. Emissions at this stationary source do not exceed these HAP thresholds; therefore, the stationary source is not a major source of HAP emissions. The HAP emissions for the stationary source are shown in the Reissuance Application.

M:\TITLE\TV Permits\PO0214\Permit V\Shield-63YYYYY.docx

**Ventura County Air Pollution Control District  
Permit Shield - Acid Rain Program  
40 CFR Parts 72 - 78**

**40 CFR Part 72, “Permits Regulation”**

**40 CFR Part 73, “Sulfur Dioxide Allowance System”**

**40 CFR Part 74, “Sulfur Dioxide Opt-Ins”**

**40 CFR Part 75, “Continuous Emission Monitoring”**

**40 CFR Part 76, “Acid Rain Nitrogen Oxides Emission Reduction Program”**

**40 CFR Part 77, “Excess Emissions”**

**40 CFR Part 78, “Appeal Procedures for Acid Rain Program”**

**Permit Shield:**

The Acid Rain Program requirements listed above have been reviewed; and it has been determined that they are not applicable to this stationary source. The following discussion details the determination of this permit shield for the cogeneration unit that consists of a GE LM 6000 natural gas-fired turbine that drives a 48 MW electrical generator.

Pursuant to 40 CFR Part 72.6(b)(5), a qualifying facility is not an affected unit subject to the requirements of the Acid Rain Program if it has, as of November 15, 1990, one or more qualifying power purchase commitments to sell at least 15 percent of its total planned net output capacity; and consists of one or more units designated by the owner or operator with total installed net output capacity not exceeding 130 percent of the total planned net output capacity. Since this cogeneration unit is a qualifying facility and sells greater than 15 percent of the planned net output capacity through qualifying power purchase commitments and has a total installed net output capacity that does not exceed 130 percent of the total planned net output capacity, it is not subject to the Acid Rain Program.

M:\TITLE\TV Permits\PO0214\Permit \Shield-40cfr72-78-rev201.docx

## 12. PART 70 PERMIT APPLICATION PACKAGE

The Part 70 permit application, which was submitted by this facility, is included in this section for reference only and is not a part of the Part 70 permit.

During the processing of the permit application, additional information was submitted by the facility in response to District requests. This additional information is included with the application. If the applicant was asked to replace a page or a portion of the application, the original submittal is stamped "REPLACED" and the replacement page or section is placed in front of the original. The applicant and District correspondence for the Part 70 permit application is located in the District permit file for this stationary source.