VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT

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

PART 70 PERMIT

Number 07891

Permit Term: April 15, 2019 to December 31, 2023

Company Name / Address
Southern California Edison
P.O. Box 5085
Rosemead, CA 91770-0908

Facility Name / Address
McGrath Peaker Generating Station
251 North Harbor Boulevard
Oxnard, CA 93035

Responsible Officials
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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.

Ali R. Ghasemi, Manager
Engineering Division

For:

Dr. Laki Tisopulos
Air Pollution Control Officer

April 8, 2020

PART 70 PERMIT NO. 07891
TABLE OF CONTENTS

8. General Applicable Requirements (Attachments)

    a. Rule 50, Opacity (50)
    b. Rule 54.B.1, Sulfur Compounds - SO_x at Point of Discharge (54.B.1)
    c. Rule 54.B.2, Sulfur Compounds - SO_x 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 74.6, Surface Cleaning and Degreasing (74.6)
    h. Rule 74.11.1, Large Water Heaters and Small Boilers (74.11.1)
    i. 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-7891)
    b. 40 CFR Parts 72 to 78 - Acid Rain Program (40CFR72-78)
    c. 40 CFR Part 82 - Protection of Stratospheric Ozone (40CFR82)
    d. Part 70 Permit Shield – 40 CFR Part 60, Subpart GG (SHIELD 60GG)
    e. Part 70 Permit Shield – 40 CFR Part 63, Subpart YYYY (SHIELD 63YYYY)
    f. Part 70 Permit Shields - 40 CFR Part 63, Subpart ZZZZ and 40 CFR Part 60, Subpart JJJJ (SHIELD-Engine)

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.

1.a PERMIT REVISONS TABLE

Application No.	Issue Date	Description	Revised Permit Sections
07891-111	07/18/14	Revised Monitoring Requirements and Startup Exemption Time / Minor Part 70 Permit Modification Fixed Emergency Engine BHP - typo	• Signature Cover Page • Permit Revisions Table • Permit Summary and Statement of Basis • Table No. 2 • Table No. 3 • Table No. 4 • Attachment 07891-T1 • Attachment 07891-Engine • Attachment PO07891PC1 • Attachment 54.B.1 • Attachment 54.B.2 • Attachment SHIELD-Engine
07891-121	11/12/14	Change of Responsible Official and Address Change of Title V Contact Person and Address	• Signature Cover Page • Revision Table
07891-131	02/09/17	Change of Responsible Official and Address	• Signature Cover Page • Revision Table
07891-141	08/23/17	Change of Responsible Official and Address	• Signature Cover Page • Revision Table
07891-161	04/15/19	Reissuance for 5-year term ending December 31, 2023	See "Permit Summary and Statement of Basis"
07891-171	04/08/20	Change of Responsible Official	• Signature Cover Page • Revision Table

1.b. PERMIT SUMMARY AND STATEMENT OF BASIS

Stationary Source Description

This stationary source generates electricity for sale to the public. This source has a Standard Industrial Classification (SIC) Code of 4911, Electric Services. The stationary source is an electric utility peaker plant called the "McGrath Peaker Generating Station". It is owned and operated by Southern California Edison (SCE). The facility is located at 251 North Harbor Boulevard on the coast in Oxnard, California. The stationary source consists of a GE LM-6000 PC SPRINT natural gas-fired turbine peaker that drives a 49.9 MW electrical generator. NOx and CO emissions from the turbine are monitored with a Continuous Emissions Monitoring (CEM) system. The stationary source also includes a natural gas-fired 924 BHP Waukesha lean burn emergency engine that can be used for "black starting" the turbine. This stationary source is subject to the Title V (40 CFR Part 70) Federal Operating Permit program because it is required to hold a Title IV Acid Rain Permit (40 CFR Part 72).

Authority to Construct No. 07891-100 for the new stationary source (gas turbine and "black start" engine) was granted by the VCAPCD on September 29, 2010. The Part 70 Permit and VCAPCD local permit applications were submitted on June 18, 2012. Initial source testing of the gas turbine was completed on December 18, 2012. The initial Part 70 Permit No. 07891 was issued December 10, 2013.

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 NOx and 100 tons per year for PM, SOx, and CO, pursuant to Rule 33.B.2 and Ventura County's "Serious" nonattainment classification with the federal ozone standard. The permitted emissions for Part 70 Permit are documented in Table No. 4, "Permitted Emissions," of the permit. Permitted Emissions of ammonia are also included in Table 4 for the gas turbine. 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. Note that the permitted emissions for this permit do not exceed the Part 70 thresholds; however, as stated above, a Part 70 Permit because it is required because the stationary source is required to hold a Title IV Acid Rain Permit (40 CFR Part 72).

Criteria pollutant emissions (ROC, NOx, PM, SOx, and CO) result from the combustion of natural gas in the gas turbine and the "black start" emergency engine. The permitted emissions are based on the BACT emission limits or EPA AP-42 emission factors and the throughput limits listed in Table No. 3 of the permit. The annual NOx emissions from the turbine are limited to 4.81 tons per year as measured by the CEM system. The ROC, NOx, and CO pounds per hour permitted emissions for the turbine are based on worst case emissions during startup periods. A detailed analysis of the permitted emissions calculations is included in the Authority to Construct No. 07891-100 engineering analysis, dated August 6, 2010.

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. An analysis of the HAPs emissions is included in the Authority to Construct Application No. 07891-100. The combined total HAPs emissions for the stationary source were determined to be 0.5 tons per year.

A health risk assessment (HRA) was also conducted and reviewed as part of the Authority to Construct application. The calculated cancer risk was determined to be 0.0008 in a million which is below the District's "no further action" threshold of 1 in a million. The Chronic Hazard and Acute Hazard Indices were found to be below the District threshold of 0.5.

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_{2e}) is the amount of greenhouse gases emitted relative to the global warming potential of each pollutant.

The CO_2 potential to emit for this stationary source has been calculated to be 102,278 tons per year. The District's 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 an emission factor of 53.02 kg CO_2/MMBTU natural gas (116.78 lb CO_2/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_2 potential to emit does not include insignificant activities or equipment exempt from permit pursuant to Rule 23, "Exemptions From Permit".

Compliance History

Upon reissuance of this Part 70 permit, the facility was determined to be in compliance with all applicable requirements.

The initial Authority to Construct was issued for this facility on September 29, 2010; and the initial Part 70 Permit was issued December 10, 2013. To date, there have been no Notices of Violation (NOVs) issued for this stationary source.

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

The gas turbine was subject to the Best Available Control Technology (BACT) requirements of Rule 26, "New Source Review" during the processing of Authority to Construct Application No. 07891-100. In addition, the turbine is subject to District 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 turbine is controlled by water injection, selective catalytic reduction (SCR), and an oxidation catalyst. The turbine is only permitted to burn natural gas.

In addition, the facility operates a continuous emissions monitoring system (CEMS) at the turbine that continuously monitors control system operating parameters, as well as emissions of NO_x and CO from the gas turbine. The CEM system is required by Rule 103, "Continuous Monitoring Systems"; as well as 40 CFR Part 75, "Continuous Emission Monitoring".

The turbine 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. Section

60.4305(b) of Subpart KKKK states that turbines subject to Subpart KKKK are exempt from the requirements of Subpart GG.

The turbine is not subject to 40 CFR, Part 63, Subpart YYYY, "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). The permit includes a permit shield for 40 CFR Part 63, Subpart YYYY.

The turbine is not subject to 40 CFR, Part 64, "Compliance Assurance Monitoring" (CAM) because it is already equipped with continuous emission monitors to comply with the NOx emission limits of Rule 26 and Rule 74.23.

The Waukesha Lean Burn natural gas fired emergency engine, "black start generator", is subject to Rule 26, "New Source Review", BACT requirements which requires that the engine be certified to meet the federal Tier 2 nonroad engine standard. The engine is also subject to District Rule 74.9, "Stationary Internal Combustion Engines". The engine is not subject to any Rule 74.9 emission limits because it is operated less than 200 hours per year. The engine is not subject to 40 CFR Part 63, Subpart ZZZZ, "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Engines" (RICE MACT) because the unit is a "new" engine as construction commenced after June 12, 2006. The engine is not subject to 40 CFR Part 60, Subpart JJJJ, "Standards of Performance for Stationary Spark Ignition Internal Combustion Engines" (NSPS) because it was manufactured prior to January 1, 2008. The permit includes a permit shield for both 40 CFR Part 63, Subpart ZZZZ and 40 CFR Part 60, Subpart JJJJ.

This stationary source has stated that 40 CFR Part 68, "Chemical Accident Prevention Provisions", is not an applicable requirement. The facility does not store any specified materials in sufficient quantities to make them subject to 40 CFR Part 68. Therefore, a federal Risk Management Plan, pursuant to section 112(r) of the federal Clean Air Act as amended, is not required. The facility has stated that a state RMP has been submitted pursuant to state regulations.

The turbine is an "affected unit" under 40 CFR Part 72 Subpart A; and is therefore subject to the acid rain requirements of 40 CFR Part 72 through 78. The stationary source is not anticipated to emit more than 1,000 pounds of sulfur dioxide; and therefore, is not required to hold any allowances. There is no requirement to hold NOx allowances. The Acid Rain Permit is included in Section No. 11 of this permit.

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. 07891 was initially issued on December 10, 2013. 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. 07891-161: Application No. 07891-161 is for the reissuance of Part 70 Permit No. 07891-161 for the five-year term ending December 31, 2023. The following items

summarize the changes from the initial Part 70 Permit No. 07891 (January 1, 2014 to December 31, 2018):

- At the applicant's request, revisions have been made to the turbine testing scenarios in which the turbine is exempt from emission limits (Attachment 07891-T1, Condition No. 3). The NOx and CO pound per hour permitted emissions have been revised accordingly in Table No. 4, "Permitted Emissions." See the Engineering Analysis for Authority to Construct No. 07891-150 for additional details.
- Additional details have been added to the permit for 40 CFR Part 60 Subpart KKKK, "Standards of Performance for Stationary Combustion Turbines," compliance. There is a higher emission limit when the turbine is operating below 75% load. Also the NOx emission monitoring standard has been corrected from a 30-day rolling average to a rolling 4-hour average. (Attachment 07891-T1, Condition No. 4). See the Engineering Analysis for Authority to Construct No. 07891-150 for additional details.
- At the applicant's request, alternative source test methods for the gas turbine have been added to the permit (Attachment 07891-T1, Condition No. 5). See the Engineering Analysis for Authority to Construct No. 07891-150 for additional details.
- Condition No. 1 of Attachment 07891 – Engine has been revised. A review of the initial permitting (Application No. 07891-101) demonstrated an emission level manufacturer documentation and no Tier 2 documentation.
- The Insignificant Activities Table has been revised (Section No. 5)
- Revised Acid Rain Title IV for new five year permit period.
- 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. 07891:
  a) Rule 50, "Opacity" (Attachment 50)
  b) Rule 54, "Sulfur Compounds" (Attachments 54.B.1 and 54.B.2)
  c) Rule 74.1, "Abrasive Blasting" (Attachment 74.1)
  d) Rule 74.2, "Architectural Coatings" (Attachment 74.2)
  e) Rule 74.6, "Surface Cleaning and Degreasing" (Attachment 74.6)
  f) Rule 74.11.1, "Large Water Heaters and Small Boilers" (Attachment 74.11.1)
  g) 40 CFR Part 82, "Protection of Stratospheric Ozone" (Attachment 40CFR82)

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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
7891-T1	Rules 26, 29, 74.23.B.1, 74.23.B.2, 103.C.1, 40 CFR Part 60 Subpart KKKK	•Annual Source Test (NOx, CO, ROC, O2, NH_3, fuel HHV) •Submit test results w/in 45 days of conducting tests •CEMs for fuel consumption, NOx, CO, O2, and control system operating parameters •Report each CEM emission violation w/in 96 hours •Annual compliance certification	•Records of CEMs data •Records of maintenance operations, periodic inspections, and repairs •Records of source test reports and any violations or limit exceedances	•Actual annual operating hours or fuel consumption •Annual source test with control system operating parameters •Rolling 4-hour NOx concentration average	•NO_x-EPA Method 7E or EPA Method 20 •CO - ARB Method 100 •ROC – EPA Method 25 or 18 •O2 - ARB Method 100 •NH3 - BAAQMD Method ST-1B (1/20/82) •Gaseous fuel HHV - ASTM Method D1826-88 or ASTM Method D1945/D3588	Streamlined Requirements
7891-T2	Rules 54 and 64, 40 CFR Part 60 Subpart KKKK	•Annual compliance certification •None for PUC-quality gas •Upon request, source test for sulfur compounds at point of discharge	•Annual fuel gas analysis for non PUC-quality gas	None	•SCAQMD Method 307-94 •Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A,16B, or SCAQMD Method 307-94, as appropriate	PUC-quality gas

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
Engine – Condition No. 1	Rule 26 – BACT – Engine NOx based on 1.25 g/BHP-hr	•Maintain documentation •Annual compliance certification	None	None	None	
Engine – Condition Nos. 2 and 7	Rule 26 – BACT – Emergency purposes only	•Recordkeeping of engine usage. •Annual compliance certification	•Purpose and elapsed time of each engine use	None	None	
Engine – Condition Nos. 3, 4, 5, 6, and 7	Rule 74.9 – Limited to 200 hours per year	•Engine equipped with non-resettable hour meter •Rolling twelve month operation records	•Rolling twelve month operation records •Engine information	•Annual hours of operation report	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
PO07891PC1 - Condition No. 1	Rules 26 – Annual natural gas limit at turbine	•Rolling twelve month natural gas consumption records •Annual compliance certification	•Rolling twelve month natural gas records	None	None	
PO07891PC1 – Condition No. 2	Rule 26 – Annual NOx emission limit at turbine	•Rolling twelve month NOx emission records per CEM •Annual compliance certification	•Rolling twelve month NOx emission records per CEM	None	None	
PO07891PC1 – Condition No. 3	Rule 26 – 200 hours per year limit at engine	•Rolling twelve month hours of operation records at engine •Annual compliance certification	•Rolling twelve month hours of operation records at engine	None	None	
PO07891PC1 - Condition No. 4	Rule 26 Natural Gas Only	•Annual compliance certification	None	None	None	
PO07891PC1 – Condition No. 5	Rule 29 - Ammonia tank equipped with PV valve	•Visual observation	None	None	None	Not federally enforceable
PO07891PC1 - Condition No.6	Rule 29 Exempt Solvents	•Maintain a list of solvents in use and permit exemption status data	None	None	None	Not federally enforceable

1.c.3. General Applicable Requirements

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

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

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	•Annual compliance certification •Maintain current solvent information •Upon request, solvent testing	•Records of current solvent information	None	•ROC content-EPA Test Method 24 or 24A •Identity of solvent components-ASTM E168-67, ASTM E169-87, or ASTM E260-85 •True vapor pressure or composite partial pressure -ASTM D2879-86 •Initial boiling point-ASTM 1078-78 or published source •Spray gun active/passive solvent losses-SCAQMD Method (10-3-89)	
74.11.1	Rule 74.11.1	•Annual compliance certification •Maintain identification records of large water heaters and small boilers	•Records of current information of large water heaters and small boilers	None	None	•Rule only applies to the installation of large water heaters and small boilers that are exempt from permit
74.22	Rule 74.22	•Annual compliance certification •Maintain furnace identification records	•Records of current furnace information	None	None	•Rule only applies to future installation of natural gas-fired, fan-type furnaces that are exempt from permit

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

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

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

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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. A "T1", "T2, or "E" corresponds to the specific permit condition attachments for this permit that are labeled T1, T2, or E.

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. The "PC#" also corresponds to the permit attachment in Section No. 7, "Permit Specific Conditions", that contains the permit specific requirements.

TABLE NO. 2

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT

Permit to Operate No. 07891

Permitted Equipment and Applicable Requirements

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Equipment	26 NSR	74.9	74.23	103	40 CFR Part 60 KKKK	40 CFR 72-78	Additional Req'ments
One (1) GE LM-6000 PC SPRINT Gas Turbine (GTG) set, rated at 49.9 MW, 505.26 MMBTU/hr, simple cycle, equipped with water injection and a Selective Catalytic Reduction (SCR) system with aqueous ammonia injection for NOx control and oxidation catatlyst for ROC and CO control The SCR unit is a Cormetech Model CMHT-21 unit with the following exterior demensions: 18'W x 25.75'H x 2.5'D. The interior reactor volume is 547.37 cubic feet. It is a high temperture vanadium catalyst. The minimum and maximum operating temperatures for the SCR catalyst are 540 and 875 degrees Fahrenheit. Equipped with a tempering air system to maintain the flue gas temperature below 830 degrees Fahrenheit, consisting of two fans which can provide ambient air into the gas turbine exhaust stream. Support equipment includes one (1) 10,500 gallon, fixed roof, 19% aqueous ammonia storage tank. The SCR unit is located just upstream of the exhaust stack. The oxidation catalyst unit is a BASF Catalysts LLC with the following exterior dimensions: 18'W x 26.67'H x 7.5"D. The minimum and maximum operating temperatures for the oxidation catalyst are 500 and 1250 degrees Fahrenheit. The oxidation catalyst is located upstream of the SCR unit. Emissions from the unit monitored with a Continuous Emissions Monitoring (CEM) system for NOx and CO.	T1,T2		T1	T1	T1,T2	X	PC1
One (1) 924 BHP Waukesha, Model VGF L36GLD Lean Burn Emergency Internal Combustion Engine, "Black Start Generator", Serial No. C-95042/1, Natural Gas Fired, produces 689 KW power for "black start" purposes (not exempt because unit operates more than 50 hr/yr for maintenance purposes - Rule 23.D.7)	E	E					PC1

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_3	Ammonia
NOx	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 NOx to meet its Rule 74.9 or Rule 74.23 compliance requirements.
SIP	State Implementation Plan
SOx	Sulfur Oxides
STIG	Steam injection in a gas turbine used for the control of NOx
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

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. 07891
Permitted Throughput/Consumption Limits

M:\TITLEV\PERMIT\PO7891\PERMITII\Tables_07891-111 Equipment	Throughput/Emission Permit Limit	District (D)/ Federal(F) Enforceable	Calculation Throughput
One (1) GE LM-6000 PC SPRINT Gas Turbine (GTG) set, rated at 49.9 MW, 505.26 MMBTU/hr, simple cycle, equipped with water injection and a Selective Catalytic Reduction (SCR) system with aqueous ammonia injection for NOx control and oxidation catatlyst for ROC and CO control The SCR unit is a Cormetech Model CMHT-21 unit with the following exterior demensions: 18'W x 25.75'H x 2.5'D. The interior reactor volume is 547.37 cubic feet. It is a high temperture vanadium catalyst. The minimum and maximum operating temperatures for the SCR catalyst are 540 and 875 degrees Fahrenheit. Equipped with a tempering air system to maintain the flue gas temperature below 830 degrees Fahrenheit, consisting of two fans which can provide ambient air into the gas turbine exhaust stream. Support equipment includes one (1) 10,500 gallon, fixed roof, 19% aqueous ammonia storage tank. The SCR unit is located just upstream of the exhaust stack. The oxidation catalyst unit is a BASF Catalysts LLC with the following exterior dimensions: 18'W x 26.67'H x 7.5"D. The minimum and maximum operating temperatures for the oxidation catalyst are 500 and 1250 degrees Fahrenheit. The oxidation catalyst is located upstream of the SCR unit. Emissions from the unit monitored with a Continuous Emissions Monitoring (CEM) system for NOx and CO.	**1,667 MMCF NG / Yr** **4.81 TPY NOx**	**F**	**1,667 MMCF NG / Yr** **4.81 TPY NOx**
One (1) 924 BHP Waukesha, Model VGF L36GLD Lean Burn Emergency Internal Combustion Engine, "Black Start Generator", Serial No. C-95042/1, Natural Gas Fired, produces 689 KW power for "black start" purposes (not exempt because unit operates more than 50 hr/yr for maintenance - Rule 23.D.7)	**200 Hrs / Yr**	**F**	**200 Hrs / Yr**

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), NOx (nitrogen oxides), PM (particulate matter), SOx (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), NOx (nitrogen oxides), PM (particulate matter), SOx (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. The permittee addressed the hazardous air pollutants in the Authority to Construct application for the facility (AC No. 07891-100).

TABLE NO. 4

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
Permit to Operate No. 07891
Permitted Emissions

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Equipment	TONS PER YEAR						POUNDS PER HOUR					
	ROC	NOx	PM	SOx	CO	NH3	ROC	NOx	PM	SOx	CO	NH3
One (1) GE LM-6000 PC SPRINT Gas Turbine (GTG) set, rated at 49.9 MW, 505.26 MMBTU/hr, simple cycle, equipped with water injection and a Selective Catalytic Reduction (SCR) system with aqueous ammonia injection for NOx control and oxidation catatlyst for ROC and CO control The SCR unit is a Cormetech Model CMH1-21 unit with the following exterior demensions: 18'W x 25.75'H x 2.5'D. The interior reactor volume is 547.37 cubic feet. It is a high temperture vanadium catalyst. The minimum and maximum operating temperatures for the SCR catalyst are 540 and 875 degrees Fahrenheit. Equipped with a tempering air system to maintain the flue gas temperature below 830 degrees Fahrenheit, consisting of two fans which can provide ambient air into the gas turbine exhaust stream. Support equipment includes one (1) 10,500 gallon, fixed roof, 19% aqueous ammonia storage tank. The SCR unit is located just upstream of the exhaust stack. The oxidation catalyst unit is a BASF Catalysts LLC with the following exterior dimensions: 18'W x 26.67'H x 7.5"D. The minimum and maximum operating temperatures for the oxidation catalyst are 500 and 1250 degrees Fahrenheit. The oxidation catalyst is located upstream of the SCR unit. Emissions from the unit monitored with a Continuous Emissions Monitoring (CEM) system for NOx and CO.	**2.24**	**4.81**	**8.64**	**0.50**	**11.79**	**5.96**	**1.38**	**50.00**	**4.99**	**0.29**	**15.80**	**3.44**
One (1) 924 BHP Waukesha, Model VGF L36GLD Lean Burn Emergency Internal Combustion Engine, "Black Start Generator", Serial No. C-95042/1, Natural Gas Fired, produces 689 KW power for "black start" purposes (not exempt because unit operates more than 50 hr/yr for maintenance - Rule 23.D.7)	**0.15**	**0.18**	**0.01**	**<0.01**	**0.20**		**1.46**	**1.76**	**0.06**	**<0.01**	**1.95**	
Total Permitted Emissions	**2.39**	**4.99**	**8.65**	**0.50**	**11.99**	**5.96**	**2.84**	**51.76**	**5.05**	**0.29**	**17.75**	**3.44**

HAP Emissions Reference: HAP emission estimates and calculations are included in the Authority to Construct Application No. 07891-100

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. 07891

INSIGNIFICANT ACTIVITIES (EXEMPT EMISSION UNITS)	BASIS FOR EXEMPTION (Size/Production Rate)	RULE 23 CITATION
Maintenance machining, cutting, drilling, sanding plastic and metal parts	Specifically exempt activities	23.B.4
Solvent used for maintenance and repair cleaning	Specifically exempt activity	23.F.7
Janitorial cleaning	Specifically exempt activity	23.F.8
Water Treatment Chemical Storage Tanks	ROC liquid storage tank $\leq$ 250 gallons	23.F.2
HVAC System	Specifically exempt activity	23.E.4

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. 07891
Gas Turbine
NO_x, CO, ROC, and NH_3 Applicable Requirements
Including Streamlined NO_x Requirements

Rule 26, "New Source Review"
Conditions applied pursuant to Rule 26 are Federally Enforceable

Rule 29, "Conditions On Permits"
Conditions applied pursuant to Rule 29 are District enforceable only

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_x measured as NO_2), carbon monoxide (CO), and ammonia (NH_3) emissions at the GE LM-6000 PC SPRINT Gas Turbine, located at the McGrath Peaker Generating Station. 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_x emission limit is the most stringent in comparison to the Rule 74.23 and NSPS NO_x 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 NOx concentration limit; therefore, the permittee will need to monitor compliance with the NSPS limit with a 4-hour rolling average NOx emission rate.

Compliance with the terms and conditions of the streamlined NO_x, CO, ROC, and NH_3 requirements for the turbine assures compliance with all individual NO_x, CO, ROC, and NH_3 applicable requirements pertaining to the turbine which have been addressed in the streamline analysis. The attached table details the determination of this permit shield for the gas turbine.

Conditions:

1. Gas Turbine Emission Limitations:

   a. Oxides of Nitrogen (NOx expressed as NO_2) emissions shall not exceed 2.5 ppmvd, referenced at fifteen (15) percent oxygen, averaged over one (1) hour. Compliance shall be based on a rolling 60 minute period with emission measurements taken every minute by the CEM or reference method source testing.
   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 6.0 ppmvd, referenced at fifteen (15) percent oxygen, averaged over one (1) hour. Compliance shall be based on a rolling 60 minute period with emission measurements taken every minute by CEM or reference method source testing.
   d. Ammonia (NH_3) emissions shall not exceed 5.0 ppmvd, referenced at fifteen (15) percent oxygen.

   The NOx, ROC, and NH3 emission concentration limits have been applied as BACT (Best Available Control Technology). The NOx emission limit is more stringent than the NOx 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, as required by Condition No. 5, and by maintaining the continuous emission monitoring and control system parameter monitoring, as specified in Condition Nos. 6 and 7.

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 or planned shutdown. This exemption has been applied pursuant to Rule 74.23.C.1.e. Due to the short duration of the unit run times, the start-up exemption shall not exceed 60 minutes; and the shutdown exemption shall not exceed 15 minutes. For failed start-ups, each restart shall begin a new exemption period.

3. The emission limits listed in Condition No. 1 shall not apply during the following testing periods:

a. "Black start islanding" and "performance testing/tuning": A "black start islanding" test consists of starting the turbine with only power generated from the 964 BHP Waukesha engine. The total duration of these tests shall not exceed 32 hours per year.
b. "Western Electricity Coordinating Council (WECC) generator modeling": This testing is conducted once every five years. The duration of the test shall not exceed ten hours during the year that it is performed.

The permittee shall maintain records of all tests, including the type of test and the duration of the test. These tests are considered to be maintenance operations pursuant to the Rule 74.23.C.1.d exemption. As stated above, the annual NOx limit of 4.81 tons per year (any rolling 12-month period) does apply during these maintenance operations.

4. The 40 CFR Part 60 Subpart KKKK, "Standards of Performance for Stationary Combustion Turbines," NOx concentration limit is 25 ppm at 15 percent oxygen (or 1.2 lb/MW-hr) when operating at or above 75% peak load and 96 ppmvd at 15% oxygen (4.7 lb/MW-hr) when operating below 75% peak load (Section 60.4320). The permittee shall demonstrate compliance with these limits with the continuous emission monitoring system with a rolling 4-hour average, pursuant to Sections 60.4350(g) and 60.4380(b)(1). There is no start-up or shutdown exemption periods for these NOx emission limits. Pursuant to Sections 60.4375(a) and 60.7(c), the permittee shall submit an excess emissions report every six months. The Report shall include the rolling 4-hour average NOx emissions monitoring.

5. 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_x	EPA Method 7E or EPA Method 20
b.	CO	ARB Method 100
c.	ROC	EPA Method 25 or EPA Method 18
d.	Oxygen content	EPA Method 3A or ARB Method 100
e.	Gaseous fuel heating value	ASTM Method D 1826-88 or D1945/D3588
e.	NH_3	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_x, CO, ROC, and NH_3 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_x 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 water injection rate, the water to fuel ratio, and the ammonia injection rate. 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.

6. Pursuant to Rule 74.23.B.2, Rule 103.A.1, and NSPS KKKK, the permittee shall provide, properly install, maintain in good working order, operate, and calibrate, in accordance with manufacturer's specifications, continuous monitoring systems at the gas turbine 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 (rolling 60-minute period) of NO_x and CO, in ppmvd, and in ppmvd corrected to 15% oxygen;
   d. 4-hour rolling average NOx emission concentration corrected to 15% oxygen;
   e. Stack gas oxygen concentration in percent;
   f. Ratio of the amount of water injected into the gas turbine's combustor to the amount of fuel consumed by the gas turbine;
   g. Ammonia injection rate;
   h. Temperature at the SCR reactor inlet;
   i. Pressure drop across the SCR catalyst bed in inches water column;
   j. NO_x emissions in lbs/hr, tons/month, and tons per rolling 12-month period;
   k. Elapsed time of operation.

   Calibrations of the continuous emission monitoring (CEM) system shall be conducted during the 60-minute startup period of the unit. After the startup period, calibrations shall not be conducted during operation of the unit if the duration of the unit run time is less than twenty-four hours. Pursuant to Rule 74.23.D.1, these records shall be available for inspection by the District upon request.

7. Pursuant to Rule 103.C.1, the continuous emission monitoring system shall be installed, calibrated, and maintained in accordance with the specifications in 40 CFR, Part 75, Continuous Emission Monitoring, Subpart C, Operation and Maintenance Requirements,

which includes by reference Appendix A to Part 75, Specifications and Test Procedures, and Appendix B to Part 75, Quality Assurance and Quality Control Procedures.

8. Pursuant to Rule 103.B.1, the permittee shall report any violation of any emission standard with which the gas turbine 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.

9. 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.

10. 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.

11. Pursuant to Rule 103.B.5.a, continuous monitoring data shall be reduced according to 40 CFR, Part 75, Appendix F, Conversion Procedures.

12. 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 on 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.

13. 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.

14. 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 rolling 4-hour average NOx emissions monitoring.

NO_x Streamlining Comparison
Gas Turbine, PO No. 07891

	RULE 74.23 AND RULE 103	NSPS SUBPART KKKK	RULE 26 NSR - BACT
WORK PRACTICE STDS.	None	None	None
EMISSION LIMIT	Rule 74.23.B.1 9 x E/25 ppmvd @ 15% O_2 equivalent emission factor: 34.83 lb NO_x/mmcf at 9 ppmvd @ 15% O_2	60.4320(a) 25 ppmvd @ 15% O_2 at ≥75% peak load equivalent emission factor: 96.8 lb NO_x/mmcf 96 ppmvd @ 15% O_2 at <75% peak load equivalent emission factor: 138.4 lb NO_x/mmcf	BACT 2.5 ppmvd @ 15% Oxygen equivalent emission factor: 9.68 lb NO_x/mmcf
MONITORING	Rule 74.23 Source test annually for NO_x and O_2 content (74.23.B.1); Monitor NO_x directly w/CEM (103.A.1); Monitor control system operating parameters and elapsed time of operation (74.23.B.2) Rule 103 CEM, maintained per 40 CFR, Part 75 (103.C.1)	60.4335 Continuously monitor fuel consumption and ratio of water (steam) to fuel; or use a continuous emission monitoring (CEM) system for NOx 60.4350(g) and 60.4380(b)(1) Demonstrate compliance with NOx limit with a 4-hour rolling average	Identical to Rule 74.23

NO_x Streamlining Comparison (Continued)
Gas Turbine, PO No. 07891

	RULE 74.23 AND RULE 103	NSPS SUBPART KKKK	RULE 26 NSR - BACT
RECORDKEEPING	Rule 74.23.D.1 Continuous records of monitoring requirements specified above (103.B.2) Rule 103 NOx CEM records, etc., reduce per 40 CFR Part 75 Appendix F (103.B.5.a)	60.4335 Continuous records of the water (or steam) to fuel ratio; or records of Continuous Emission Monitoring system	Identical to Rule 74.23
REPORTING	74.23.E Actual annual fuel consumption or operating hours Annual source test report Rule 103 Report NOx 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)	60.4375(a) and 60.7(c) Exceedances and monitor downtime; submit a report every six months	None
TEST METHODS	74.23.F NO_x - EPA Method 20 O_2 content – ARB Method 100 Gaseous fuel HHV - ASTM Method D 1826-88 NH_3 - BAAQMD Method ST-1B, 1/20/82	60.4400 NO_x - EPA Method 7E or 20	Identical to Rule 74.23

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Ventura County Air Pollution Control District
Part 70 Permit No. 07891
Gas Turbine Based
SO_x Applicable Requirements - Streamlined

Rule 26, "New Source Review"
Conditions applied pursuant to Rule 26 are Federally-Enforceable

Rule 54, "Sulfur Compounds"
Adopted 06/14/94, 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 (SOx measured as SO2) emissions at the GE LM-6000 PC SPRINT Gas Turbine, located at the McGrath Peaker Generating Station. This attachment describes and streamlines the most stringent sulfur content of fuel and SOx 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 SOx emission limits are the most stringent in comparison to the Rule 54 and Rule 64 emission limits and sulfur content limits. The gas turbine has a Rule 26, "New Source Review", BACT requirement for sulfur oxides to burn Public Utilities Commission (PUC)-regulated natural gas only (Attachment PO07891PC1). 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_x requirements for the gas turbine assures compliance with all individual SO_x applicable requirements pertaining to the gas turbine which have been addressed in the streamline analysis. The attached table details the

determination of this permit shield for the GE LM-6000 SPRINT PC Gas Turbine that drives a 49.9 MW electrical generator.

Conditions:

1. SOx (SOx expressed as SO_2) 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 Rule 64 and 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. Pursuant to Rule 54.B.1, no person shall discharge sulfur compounds, calculated as sulfur dioxide (SO_2), which would exist as a liquid or gas at standard conditions, in excess of the following concentration limits:

   a. 300 ppmv at the point of discharge.
   b. 0.25 ppmv averaged over one (1) hour and/or 0.04 ppmv averaged over 24 hours at ground level or sea level at any point at or beyond the property line.

   In order to comply with Rule 54, the permittee shall comply with the fuel sulfur content limits Rule 64 and NSPS Subpart KKKK. Therefore, no additional periodic monitoring requirements for Rule 54 are required if only Public Utilities Commission-regulated natural gas is combusted.

4. 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_x Streamlining Comparison
Gas Turbine Based Cogeneration Unit, PO No. 07891

	RULES 54 and 64	NSPS SUBPART KKKK	RULE 26 NSR - BACT
WORK PRACTICE STDS.	None	None	None
EMISSION LIMIT	Rule 54.B.1 ≤ 300 ppmv (EF = 455.3 lb SO_x/mmcf @ 3% O2) (EF = 1612.8 lb SO_x/mmcf @ 15% O2) Rule 64.B.1 Sulfur Compounds ≤ 50 grains per 100 ft^3 (788 ppmv) calculated as H_2S @ standard conditions (Equivalent EF = 134.5 lb SOx/mmcf)	60.4330 0.90 lbs / MWh gross output or 0.060 lb SO_2 / MMBTU heat input (Equivalent EF = 63.0 lb SO_x/mmcf)	Permitted to burn Public Utilities Commission (PUC)-regulated natural gas only
MONITORING	Rules 54 and 64 PUC-quality natural gas - None Non-PUC quality natural gas - Annual analysis of fuel sulfur content	60.4365 PUC-quality natural gas - None, as approved by the District (Administrator)	None

SO_x Streamlining Comparison (Continued)
Gas Turbine Based Cogeneration Unit, PO No. 07891

	RULES 54 and 64	NSPS SUBPART KKKK	RULE 26 NSR - BACT
RECORDKEEPING	Rules 54 and 64 PUC-quality natural gas - None Non-PUC quality natural gas - Maintain records of annual fuel analyses	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)	None
REPORTING	Provide fuel records to the District upon request	60.4375(a) Exceedances and down time	None
TEST METHODS	Rule 54.D.1 SO_x - EPA Methods 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD Method 307-94 Rule 64.E Sulfur content of gaseous fuels - SCAQMD Method 307-94 or other options (see Rule 64.E)	60.4415(2) SO_x - EPA Method 6, 6C, 8, or 20 60.4415(1) Sulfur content of gaseous fuels - ASTM D4177 (sampling) and ASTM D1072 (analysis) 1072-80	None

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Ventura County Air Pollution Control District
Part 70 Permit No. 07891
Engine Applicable Requirements

Rule 26, "New Source Review"
Conditions applied pursuant to Rule 26 are Federally Enforceable

Rule 74.9, "Stationary Internal Combustion Engines"
Adopted 11/08/05, Federally Enforceable

Applicability:

This attachment applies to the 924 BHP Waukesha Lean Burn Natural Gas Engine (Model L36GLD, Serial No. C-95042/1) which produces 689 KW power for "black starting" of the gas turbine. This attachment describes the requirements of Rule 26, "New Source Review" BACT (Best Available Control Technology); and VCAPCD Rule 74.9, "Stationary Internal Combustion Engines".

Conditions:

1. The permitted emissions for the 924 BHP Waukesha natural gas "black start" engine are based on a NOx emission level of 1.25 grams NOx / BHP-hr. The permittee shall maintain manufacturer's emission documentation that the engine meets this emissions level. (Rule 26)

2. The engine shall be used only when electrical power line service fails, except when operated for maintenance / testing purposes (including testing of the "black start" for the turbine). (Rule 26)

3. Pursuant to Section D.2 of Rule 74.9, an applicable stationary internal combustion engine shall not be operated more than 200 hours per calendar year.

4. Pursuant to Section D.2 of Rule 74.9, each engine shall be equipped with an operating, non-resettable, elapsed operating hour meter.

5. 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.

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

7. The 924 BHP Waukesha natural gas "black start" engine recordkeeping requirements:

   a. Maintain a log book documenting the purpose and elapsed time of each use of the engine.
   b. Maintain records of monthly hours of operation
   c. Maintain a rolling twelve-month hours of operation record.

   These records shall be available for inspection by the District upon request and shall be maintained for five years.

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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. 07891
Additional Permit Requirements

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. Natural gas consumption at the GE LM-6000 Gas Turbine shall not exceed 1,667 million cubic feet per year (MMSCF/yr). This is the same annual turbine combustion limit stated in Section No. 3, "Permitted Throughput and Consumption Limit Table", of this permit.

   In order to comply with this condition, the permittee shall maintain monthly records of natural gas consumption at the turbine. The monthly records shall be summed for the previous 12 calendar months. Totals for any of these 12 calendar month rolling periods in excess of the specified limit shall be considered a violation of this condition. (Rule 26)

2. Annual NOx emissions from the GE LM-6000 Gas Turbine shall not exceed 4.81 tons per year. This limit includes all operational periods of the turbine; there are no exemption periods.

   In order to demonstrate compliance with this condition, the permittee shall install, calibrate, and maintain a continuous NOx emissions monitor as required by Attachment "Gas Turbine NOx, CO, ROC, and NH_3 Applicable Requirements" (Section No. 6). The permittee shall maintain a record of the rolling twelve-month NOx emissions from the turbine as measured by the Continuous Emissions Monitoring system (CEMs). If the CEMs system is not operating for any reason, then the turbine NOx emissions shall be calculated for that period. NOx emissions from the turbine shall not exceed 4.81 tons per year over any 12 calendar month rolling period.

   The stationary source NOx permitted emissions are limited to 4.99 tons per year for Rule 26.2, "New Source Review – Requirements", compliance. The permitted emissions for the 924 BHP Waukesha Engine have been calculated to be 0.18 tons per year NOx.

Therefore, the GE LM-6000 Gas Turbine is limited to 4.81 tons per year NOx.

3. The 924 BHP Waukesha natural gas engine (black start generator) shall not be used more than 200 hours per year. This includes all hours of operation, including both emergency operation and non-emergency operation. This is the same annual engine combustion limit stated in Section No. 3, "Permitted Throughput and Consumption Limit Table", of this permit.

   In order to comply with this condition, the permittee shall maintain monthly hours of operation records at the engine. The monthly records shall be summed for the previous 12 calendar months. Totals for any of these 12 calendar month rolling periods in excess of the specified limit shall be considered a violation of this condition. (Rule 26)

4. The turbine and engine shall only be fired on Public Utilities Commission-regulated natural gas. This condition is applied as BACT (Best Available Control Technology). (Rule 26)

5. The 10,500 gallon ammonia storage tank shall be equipped with a pressure-vacuum relief valve set at 50 psig and shall be vented to the vessel from which it is being filled during all filling operations. (Rule 29)

6. 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)

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_2), 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_2), at 15% O_2	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.

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^{th} 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_2 concentration value and sort all these daily maximum hourly values by descending value. The 99^{th} percentile is the 4^{th} highest value for each modeled year. Calculate the average of the 99^{th} 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_2

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_2 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.

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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.

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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.

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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 colorimetric 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.

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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.

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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.

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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 NOx (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.

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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.

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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.

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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.

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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.

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)

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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)

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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 individual attachments. The attachment is identified with the label "Attachment 40CFR (Part No.) __" in the lower left corner of each attachment.

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 regulated substances that are contained in a process at this facility and that exceed the threshold quantity, 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 a facility that has stated that a federal Risk Management Plan (RMP) pursuant to section 112(r) is currently not required, but where flexibility is desired to preclude a permit reopening should 40 CFR Part 68 become an applicable requirement.

The Selective Catalytic Reduction (SCR) system for NOx control at the turbine uses 19% aqueous ammonia; however aqueous ammonia must be greater than 20% ammonia in order to be one of the regulated toxic substances listed in the US EPA RMP regulations (40 CFR Part 68.130). Therefore, the stationary source is not subject to federal RMP regulations. However, a RMP is required pursuant to California Accidental Risk Prevention (CalARP) regulations. The RMP has been submitted and approved by the Oxnard Certified Unified Program Agency (CUPA).

Conditions:

1. Should the stationary source, as defined in 40 CFR Part 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in Part 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 CFR Part 70.

Ventura County Air Pollution Control District
40 CFR Parts 72 - 78 Applicable Requirements
Acid Rain Program

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"
Federally-Enforceable

Applicability:

Pursuant to 40 CFR Part 72, Section 72.6, this stationary source is an affected source and is subject to the requirements of the Acid Rain Program. This source has been issued a Title IV acid rain permit separate from the Title V federal operating permit. The Title IV acid rain permit has an effective date of January 1, 2019 to December 31, 2023, which is identical to the Title V Permit effective date. A copy of the Title IV acid rain permit follows this attachment.

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VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT

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

TITLE IV ACID RAIN PERMIT

Number 07891

Effective: January 1, 2019 to December 31, 2023

ORIS Code: 000350

Company Name / Address

Southern California Edison
P.O. Box 5085
Rosemead, CA 91770-0908

Dan Golden
Primary Representative
559/893-2077

Facility Name / Address

McGrath Peaker Generating Station
251 North Harbor Boulevard
Oxnard, CA 93035

Phillip Herrington
Alternate Representative
626/302-0500

Acid Rain Permit Contents

1. Statement of Basis

2. SO_2 allowances allocated under this permit for each affected unit.

3. The permit application for this source. The owners and operators of this source must comply with the standard requirements and special provisions set forth in the application.

For:

Kerby E. Zozula, Manager
Engineering Division

Michael Villegas
Air Pollution Control Officer

Issue Date

1. STATEMENT OF BASIS

Statutory and Regulatory Authorities: In accordance with Ventura County Air Pollution Control District Rule 33, "Part 70 Permits", and Rule 34, "Acid Deposition Control", and Titles IV and V of the Clean Air Act, the Ventura County Air Pollution Control District issues this permit pursuant to Rule 33 and Rule 34.

2. SO_2 ALLOWANCE ALLOCATIONS FOR EACH AFFECTED UNIT

SOx Permitted Emissions are 0.50 tons per year. The stationary source will not emit more than 1,000 lb SO_2 per year. Therefore, the stationary source is not required to hold any SO_2 allowances.

3. PERMIT APPLICATION

Attached

United States
Environmental Protection Agency
Acid Rain Program

OMB No. 2060-0258
Approval expires 11/30/2012

Acid Rain Permit Application

For more information, see instructions and 40 CFR 72.30 and 72.31.

This submission is: XX new ~ revised ~ for Acid Rain permit renewal

STEP 1

Identify the facility name, State, and plant (ORIS) code.

Facility Name:Southern California Edison, McGrath Beach Peaker Generating Station	State: California	Plant Code: 56471

STEP 2

Enter the unit ID# for every affected unit at the affected source in column "a."

a	b
Unit ID#	Unit Will Hold Allowances in Accordance with 40 CFR 72.9(c)(1)
CT1	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes

Facility (Source) Name (from STEP 1)

STEP 3

Read the standard requirements.

Permit Requirements

(1) The designated representative of each affected source and each affected unit at the source shall:

(i) Submit a complete Acid Rain permit application (including a compliance plan) under 40 CFR part 72 in accordance with the deadlines specified in 40 CFR 72.30; and

(ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain permit application and issue or deny an Acid Rain permit;

(2) The owners and operators of each affected source and each affected unit at the source shall:

(i) Operate the unit in compliance with a complete Acid Rain permit application or a superseding Acid Rain permit issued by the permitting authority; and

(ii) Have an Acid Rain Permit.

Monitoring Requirements

(1) The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75.

(2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the source or unit, as appropriate, with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.

(3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements

(1) The owners and operators of each source and each affected unit at the source shall:

(i) Hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under 40 CFR 73.34(c)), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and

(ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.

(2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.

(3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:

(i) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or

(ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3).

Facility (Source) Name (from STEP 1)

Sulfur Dioxide Requirements, Cont'd.

STEP 3, Cont'd.

(4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
(5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
(6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
(7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements

The owners and operators of the source and each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements

(1) The designated representative of an affected source that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
(2) The owners and operators of an affected source that has excess emissions in any calendar year shall:
(i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
(ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements

(1) Unless otherwise provided, the owners and operators of the source and each affected unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:
(i) The certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;

Recordkeeping and Reporting Requirements, Cont'd.

STEP 3, Cont'd.

(ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply.
(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,
(iv) Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.

(2) The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability

(1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
(2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
(3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
(4) Each affected source and each affected unit shall meet the requirements of the Acid Rain Program.
(5) Any provision of the Acid Rain Program that applies to an affected source (including a provision applicable to the designated representative of an affected source) shall also apply to the owners and operators of such source and of the affected units at the source.
(6) Any provision of the Acid Rain Program that applies to an affected unit (including a provision applicable to the designated representative of an affected unit) shall also apply to the owners and operators of such unit.
(7) Each violation of a provision of 40 CFR parts 72, 73, 74, 75, 76, 77, and 78 by an affected source or affected unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities

No provision of the Acid Rain Program, an Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 shall be construed as:
(1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an affected source or affected unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating

Facility (Source) Name (from STEP 1)

Effect on Other Authorities, Cont'd.

to applicable National Ambient Air Quality Standards or State Implementation Plans;

STEP 3, Cont'd.

(2) Limiting the number of allowances a source can hold; *provided,* that the number of allowances held by the source shall not affect the source's obligation to comply with any other provisions of the Act;
(3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;
(4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
(5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

Certification

STEP 4
Read the certification statement, sign, and date.

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name Russ W. Krieger	
Signature Russ Krieger	Date 6/14/12

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 11/18/16)

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 stated 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 stated in 40 CFR Part 82.150, 40 CFR Part 82, Subpart F applies to any person maintaining, servicing, or repairing appliances containing class I, class II, or non-exempt substitute refrigerants. This subpart also applies to persons disposing of such appliances (including small appliances and motor vehicle air conditioners), refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recovery and/or recycling equipment, approved recovery and/or recycling equipment testing organizations, and persons buying, selling, or offering to sell class I, class II, or non-exempt substitute refrigerants.

As defined in 40 CFR82.152, *appliance* means any device which contains and uses a class I or class II substance or substitute as a refrigerant and which is used for household or commercial purposes, including any air conditioner, motor vehicle air conditioner, refrigerator, chiller, or freezer. For a system with multiple circuits, each independent circuit is considered a separate appliance. *Refrigerant* means, for purposes of this subpart, any substance, including blends and mixtures, consisting in part or whole of a class I or class II ozone-depleting substance or substitute 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."

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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 Gas 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. The GE LM-6000 PC SPRINT gas turbine at the McGrath Peaker Generating Station was installed in 2010; therefore, Subpart KKKK is applicable to the turbine. 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.

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

40 CFR Part 63, Subpart YYYY, "National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines"

Permit Shield:

The requirements of 40 CFR Part 63, Subpart YYYY, "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 PC SPRINT Gas Turbine. The unit is fired on natural gas only.

Discussion:

40 CFR Part 63, Subpart YYYY, 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 soruce is not a major source of HAP emissions. The HAP emissions for the stationary source are shown in the application submitted for Authority to Construct No. 07891-100.

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Ventura County Air Pollution Control District
Engine Permit Shield

40 CFR Part 63, Subpart ZZZZ, "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Engines" (RICE MACT)

40 CFR Part 60, Subpart JJJJ, "Standards of Performance for Stationary Spark Ignition Internal Combustion Engines" (NSPS)

Permit Shield:

The NESHAP and New Source Performance Standards listed above have been reviewed; and it has been determined that they are not applicable to the 924 BHP Waukesha natural gas lean burn "black start" engine. The following discussion details the determination of this permit shield for the engine.

Discussion:

40 CFR Part 63, Subpart ZZZZ, "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Engines", is applicable to stationary reciprocating engines that operate at a major source of HAP (Hazardous Air Pollutant) emissions and also to engines that operate at an Area Source of HAP 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. An area source of HAP emissions is a source that is not a major source. Pursuant to Section 63.6590(a)(2)(iii), Subpart ZZZZ is applicable to the 924 HP natural gas engine because it is located at an area source of HAP and is "new". The unit is "new" because construction commenced after June 12, 2006. Section 63.6590(c) states that a new stationary compression ignition engine located at an area source meets the requirements of Subpart ZZZZ by meeting the requirements of 40 CFR Part 60, Subpart JJJJ; and that no further requirements of Subpart ZZZZ apply to the engine.

40 CFR Part 60, Subpart JJJJ, "Standards of Performance for Stationary Spark Ignition Internal Combustion Engines," is applicable to various categories of spark ignition engines that are manufactured, modified, or reconstructed after specific listed dates. Section 60.4230(a)(3)(ii) states that the provisions of Subpart JJJJ are applicable to lean burn engines with a maximum engine power greater than or equal to 500 HP and less than 1,350 HP with a manufacture date on or after January 1, 2008. Date of manufacture is defined in Subpart JJJJ as the date the engine is originally produced. The nameplate for the engine is stamped "FEB 2007". The engine was manufactured prior to January 1, 2008; therefore, Subpart JJJJ is not applicable to the 924 HP natural gas lean burn "black start" engine at the stationary source.

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.