VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT

4567 Telephone Road
Ventura, CA 93003
805/303-4005

PART 70 PERMIT

Number 00015

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

Company Name / Address:
The Procter & Gamble Paper Products Company
800 North Rice Avenue
Oxnard, CA 93030

Facility Name / Address:
The Procter & Gamble Paper Products Company
800 North Rice Avenue
Oxnard, CA 93030

Responsible Official:
Rachel Buchenroth
Plant Manager
937/776-2771
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Title V Permit Contact:
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Technical Environmental Engineer
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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
Air Pollution Control Officer

March 20, 2023

PART 70 PERMIT NO. 00015
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1.a. PERMIT REVISONS TABLE

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00015-241	11/13/01	Modified Turbine NOx Emission Limits Pursuant to Revisions to Rule 74.23 / Significant Part 70 Permit Modification	• Signature Cover Page • Permit Revisions Table • Table No. 2 • Applicable Requirement Code Key • Table No. 3 • Table No. 4 • Attachment STRMLN 15LM5000-NOx,CO,NH3 • Attachment STRMLN 15LM2500-NOx,CO • Attachment PO0015PC2
00015-261	05/22/02	Changed Responsible Official / Administrative Amendment	• Signature Cover Page • Permit Revisions Table
00015-271	04/21/03	Changed Title V Contact Person / Administrative Amendment	• Signature Cover Page • Permit Revisions Table
00015-301	12/02/03	Changed Responsible Official / Administrative Amendment	• Signature Cover Page • Permit Revisions Table
00015-281	06/03/04	Permit Reissuance for Period January 1, 2004 to December 31, 2008	See “Stationary Source Description”
00015-291 00015-311	09/26/05	Application 291: Replacement of LM 5000 Turbine with LM 6000 Turbine Application 311: Permit Existing Emergency Engines pursuant to revision to Rule 23.D.7	• Signature Cover Page • Table of Contents • Permit Revisions Table • Stationary Source Descripton • Periodic Monitoring Summary • Table No. 2 • Applicable Requirements Code Key • Table No. 3 • Table No. 4 • Insignificant Activities Table • Attachment 74.6(2003) • Attachment STRMLN 15LM6000-NOx • Attachment STRMLN15-SOx

			• Attachment ATCM Emergency Fire Pump Engines • Attachment PO00015PC2 • Attachment PO00015PC7 • Attachment 57.1 • Attachment 74.6(2003) • Attachment SHIELD-40CFR72-78 **Remove the following:** • Attachment 74.6.1N1(2002) • Attachment STRMLN 15LM5000-NOx,CO,NH_3 • Attachment 52 • Attachment 57.B • Attachment 68 • Attachment 74.6(2002)
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00015-391	02/21/12	Administrative Amendment, Correct MW for LM2500 Gas Turbine	• Signature Cover Page • Permit Revisions Table • Permit Summary and Statement of Basis • Table No. 2 • Table No. 3 • Table No. 4 • Attachment STRMLN15 LM2500-NOx,CO • Attachment PO00015PC7 • Attachment SHIELD-40CFR72-78
00015-381 00015-401	10/11/12	Application 381: Increase CO Permitted Emissions at LM 2500 Turbine / Minor Part 70 Permit Modification Application 401: Administrative Amendment to change the Responsible Official	• Signature Cover Page • Table of Contents • Permit Revisions Table • Table No. 2 • Table No. 3 • Table No. 4 • Attachment 63ZZZZ • Attachment PO00015PC2
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00015-411 00015-431 00015-441	04/17/14	App 411: Use of Temporary Boiler App 431: Increase CO lb/hr at LM-6000 Turbine App 441: Permit Reissuance for Period Ending December 31, 2018	See "Permit Summary and Statement of Basis"
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1.b. PERMIT SUMMARY AND STATEMENT OF BASIS

Stationary Source Description

This stationary source is a manufacturing facility that produces toilet tissue and paper towels. This source has a Standard Industrial Classification (SIC) Code of 2676, Sanitary Paper Products. Major equipment at the source includes two paper machines equipped with natural gas-fired dryers and venturi scrubbers for particulate control; two natural gas-fired cogeneration turbines that provide the paper process with electricity, steam, and hot air; and a natural-gas fired boiler that also provides process steam. Bleached pulp is used as a raw material and the paper products are formed and dried in the paper machines. Both steam and hot air are used for drying. ROC-containing materials such as inks, glues, dyes, and perfumes may be used in the manufacturing process. The toilet tissues and paper towels are also packaged and boxed for final distribution. This stationary source is subject to the Part 70 permit program based upon the potential to emit reactive organic compounds (ROC), nitrogen oxides (NO_x), and carbon monoxide (CO).

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. Ventura County's nonattainment classification with the federal ozone standard has been in transition and is currently set at "Serious". This stationary source is subject to the Part 70 permit program based upon the potential to emit of reactive organic compounds (ROC), nitrogen oxides (NOx), and carbon monoxide (CO) in excess of the thresholds as shown in Table No. 4 in Section No. 4 of this permit. The purpose of Table No. 4 is to document the permitted emissions of the criteria pollutants ROC, NOx, PM, SOx, and CO for this stationary source. Permitted Emissions of ammonia are also included in Table 4 for the 49.9 MW cogeneration unit. District Rule 29, "Conditions on Permits", requires permitted emissions to be included on each Permit to Operate. District Rule 29 requires that annual permitted emissions be based on a 12 calendar month rolling period and be expressed in units of tons per year. Hourly permitted emissions are

required to be expressed in units of pounds per hour. Permitted emissions for a stationary source are required to be determined by aggregating the permitted emissions for each emissions unit at the stationary source.

Criteria pollutant emissions (ROC, NOx, PM, SOx, and CO) result from the combustion of natural gas in the cogeneration units, the steam boiler, and the paper machine furnaces and the combustion of diesel fuel in the emergency fire suppression engines. Additional process particulate matter (PM) emissions result from the paper machines. There are ROC permitted emissions from the use of additives and inks in the toilet tissue and paper towel production.

This stationary source is not a major source of federal Hazardous Air Pollutants (HAPs). The source is well below the HAP major source levels of 10 tons per year of a single HAP or 25 tons per year of combined HAPs. The Part 70 Permit re-issuance application includes a summary (in the units of pounds per year and pounds per hour) of pollutants that are subject to the State of California AB2588 Air Toxics "Hot Spot" Program. The goal of the Air Toxics "Hot Spots" Information and Assessment Act of 1987 (California Health and Safety Code Section 44300) is to collect air toxics emission data, to identify facilities having localized adverse health impacts, to ascertain health risks, to notify nearby workers and residents of significant risks, and to reduce significant risks if they exist. Under state law, motor vehicles (on-road and off-road) are not subject to the "Hot Spots" program. This facility has been subject to the "Hot Spots" program since the program's inception. Based on the quantity of toxic air contaminants released from the facility as determined by source testing, material balance calculations, and other engineering estimates, the potency and toxicity of materials released, and the proximity to sensitive receptors, this facility has been classified at the "intermediate" level. As an intermediate level facility, the stationary source is required to provide a toxics report every four years. The most recent submittal was received in February 2017 for the 2016 reporting year. This report stated that there have been some decreases in activity; however, there is no change to the priority level or risk.

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 submitted Part 70 Permit Reissuance application includes a calculation of the total Greenhouse Gas potential to emit of 402,579 tons CO_{2e} per year. This calculation is based on the permitted annual combustion and operational (hours per year) limits listed in Table No. 3 of the permit. The CO2e emissions were calculated using methods described in 40 CFR Part 98, "Mandatory Greenhous Gas Reporting," Subparts A and C (2016). Sources combusting natural gas use an emission factor of 117.10 lb CO_{2e}/MMBTU; and sources combusting diesel fuel use

163.21 lb CO_{2e}/MMBTU. The CO_{2e} potential to emit does not include insignificant activities or equipment exempt from permit pursuant to Rule 23, "Exemptions From Permit".

Major GHG-emitting sources, such as electricity generation and large stationary sources that emitted more than 25,000 metric tons of carbon dioxide equivalent ($MTCO_{2e}$) per year, are required to comply with the California GHG Cap-and-Trade Program and the Mandatory Reporting of Greenhouse Gas Emissions (MRR). This stationary source is subject to the program. This program is regulated and implemented by the California Air Resources Board (CARB), and not the District. The reported data can be found on CARB's website.

Compliance History

Upon reissuance of this Part 70 permit, the facility was determined to be in compliance with all applicable requirements. For the time period January 1, 1996 to August 13, 2018, the facility received fourteen (14) Notices of Violation (NOV) as detailed in the "NOV by Facility" history for Facility No. 00015 located at the end of this section of the Part 70 Permit.

Equipment Description and Applicable Requirements - General

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

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

Equipment Description and Applicable Requirements - Specific

The source operates two cogeneration units. One of the units consists of a General Electric LM-6000 natural gas-fired turbine that drives a 49.9 MW electrical generator. The other cogeneration unit consists of a General Electric LM-2500 natural gas-fired turbine that drives a 22.7 MW electrical generator. Both of the turbines are subject to Rule 74.23, "Stationary Gas Turbines", and 40 CFR Part 60 Subpart GG, "Standards of Performance for Stationary Gas Turbines". The GE LM-6000 turbine is also subject to Rule 26, "New Source Review" Best

Available Control Technology (BACT) requirements. In order to comply with these requirements, the LM-6000 turbine emissions are controlled by selective catalytic reduction (SCR), steam injection, and an oxidation catalyst; and the LM-2500 turbine emissions are controlled by water injection. In addition, the facility operates a continuous emissions monitoring system (CEMS) at each turbine that continuously monitors control system operating parameters, as well as emissions of NO_x and CO from the gas turbines.

The turbines are not subject to 40 CFR Part 60, Subpart KKKK, "Standards of Performance for Stationary Combustion Turbines", and 40 CFR Part 63, Subpart YYYY, "National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines". Permit shields are included in the Part 70 Permit for the NSPS standard (Part 60, Subpart KKKK) and the MACT standard (Part 63, Subpart YYYY).

The stationary source also operates a 100 MMBTU/Hr Babcock & Wilcox Steam Boiler. This boiler is equipped with a low NO_x burner and flue gas recirculation to comply with Rule 74.15, "Boilers, Steam Generators, and Process Heaters". The permit also allows for the use of temporary boiler to take the place of the unit while the Babcock & Wilcox boiler is being maintained. The boiler is not subject to 40 CFR 60, Subpart Dc, "Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units." A permit shield is included in the Part 70 Permit for the NSPS standard (Part 60, Subpart Dc).

There are four emergency engines at the stationary source used for fire suppression. The units are subject to the California Air Toxic Control Measure (ATCM) for Stationary Compression Ignition Engines. The units are exempt from the particulate matter emission standards of the ATCM since they are used for fire suppression purposes only. The engines are also subject to the maintenance requirements of the federal National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT).

Paper Machine 1X has a 150 MMBTU/hr natural gas fired hot air furnace and a Yankee drying hood with two natural gas fired burners each rated at 14 MMBTU/hr. Paper Machine 2X has a 70 MMBTU/hr natural gas fired dryer furnace equipped with a low NOx burner and a 40 MMBTU/hr natural gas fired Yankee trim furnace equipped with a low NOx burner. Each of these combustion units is subject to Rule 74.34, "NOx Reductions From Miscellaneous Sources", However, each of these units is exempt from the NOx and CO emission limits of Rule 74.34 pursuant to Section C.2.a which exempts furnaces operated at sanitary paper products manufacturing facilities (SIC Code 2676). Therefore, compliance testing and emission screening requirements pursuant to Rule 74.34.B.5 are not applicable. These combustion units associated with the paper machines will comply with the combustion system maintenance requirements and associated recordkeeping in Rule 74.34.B.6.

The turbine-based cogeneration units are not subject to 40 CFR, Part 64, "Compliance Assurance Monitoring" (CAM) because the units are already equipped with continuous emission monitors to comply with the NOx emission limits of Rule 74.23. The flue gas recirculation control on the Babcock and Wilcox Steam Boiler is not subject to CAM because the potential uncontrolled NOx emissions for the unit are less than 25 tons per year.

The venturi scrubbers that control particulate emissions at the 1X and 2X paper machines are subject to 40 CFR, Part 64, "Compliance Assurance Monitoring" (CAM). The scrubber that controls particulate emissions at the wet lapper is not subject to CAM because the potential uncontrolled particulate matter emissions for the unit are less than 100 tons per year. The differential pressures and flow rates across the scrubbers are used as compliance monitoring indicators for the paper machine particulate matter emission limits.

The stationary source also operates a flexographic printing operation as part of the manufacturing process to print designs on paper towels. This flexographic printing process is subject to Rule 74.19, "Graphic Arts Operations", and to the "area source" requirements of 40 CFR Part 63, Subpart KK, "National Emission Standards for the Printing and Publishing Industry". Only the area source requirements of this subpart apply as the facility is not a major source of HAPs.

There are three cold cleaners currently operating at the stationary source. The cleaners are exempt from permit based on the use of cleaning agents certified by SCAQMD as Clean Air Solvents or cleaning agents which contain no more than 25 grams per liter of ROC as used and no more than 5% by weight combined of methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, and chloroform pursuant to Rule 23.F.10.a and b. In addition, these units are not subject to Rule 74.6, "Surface Cleaning and Degreasing," because the cleaning agents used in them have an ROC content of 25 grams per liter or less or are certified as SCAQMD Clean Air Solvents. The Rule 74.6 attachment is included in Section No. 8, "General Applicable Requirements" of the permit because there are some solvent and solvent cleaning activities taking place at the stationary source that are subject to the rule. The three cold cleaners are not listed on the "Permitted Equipment and Applicable Requirements" table (Table No. 2) because there are no applicable requirements. The cold cleaners are listed in the Insignificant Activities (Exempt Equipment) table (Section No. 5).

The stationary source has refrigerant systems that are subject to the registration, leak detection, and monitoring requirements of the California Regulation for the Management of High Global Warming Potential Refrigerants for Stationary Sources. The refrigerant systems are not subject to permitting; and the regulation is enforced by the state of California, and not the Ventura County APCD.

This stationary source has stated that 40 CFR Part 68, "Chemical Accident Prevention Provisions", is not an applicable requirement. Ammonia is stored onsite; however, the amount stored is less than the threshold amount of 10,000 pounds. Therefore, a federal Risk Management Plan, pursuant to section 112(r) of the federal Clean Air Act as amended, is not required. A status statement for 40 CFR Part 68 is included in the Part 70 Permit (Section No. 11).

The LM-6000 and LM-2500 turbines at this stationary source are not by definition "affected units" under 40 CFR Part 72 Subpart A, and therefore are not subject to the acid rain program requirements of 40 CFR Parts 72 through 78.

This facility has a permit shield from the individual applicable requirements, which have been incorporated into a turbine streamline table. Each of the turbines has streamlined requirements. Demonstrating compliance with the streamlined requirements assures compliance with the subsumed individual turbine requirements.

Permit Revisions Summary

The Permit Revisions Table (located in Section No. 1 of the permit) is a list of all permit revisions since Part 70 Permit No. 00015 was initially issued on January 1, 1999. 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. 00015-281: This Part 70 Permit was reissued on June 3, 2004 for the period January 1, 2004 to December 31, 2008, pursuant to Reissuance Application No. 00015-281 (submitted June 27, 2003). Note that the Procter & Gamble reissuance application included a request to reduce the annual CO mass emission limit from the combustion units at the stationary source. This CO reduction was delayed until the processing of Application No. 00015-291 for the replacement of the GE LM-5000 Turbine with a GE LM-6000 Turbine. The following items summarize the changes to the permit as a result of the Reissuance application:

- The permitted emissions, as shown in Table No. 4, and the annual mass emission limits and emission factors in Attachment PO00015PC2 Condition No. 1 have been revised to reflect the most recent updates to EPA's AP-42 natural gas external combustion emission factors.
- Permit Attachment 74.9N7 has been added to the permit to reflect the requirements of Rule 74.9, "Stationary Internal Combustion Engines", to the emergency fire water pump engines that are exempt from permit pursuant to Rule 23.D.7.
- A permit attachment detailing the applicable requirements of Rule 74.11.1, "Large Water Heaters and Small Boilers", has been added to the permit.
- 40 CFR Part 64, "Compliance Assurance Monitoring", requirements for the 1X and 2X Paper Machine scrubbers have been added to Attachment PO00015PC5 of the permit.
- Permit conditions that enforce Emission Reduction Credit Certificate No. 1166 have been added to the permit pursuant to Permit to Operate Application No. 00015-251. The permit conditions are located in new Attachment PO00015PC8.
- The Part 68 Permit Attachment has been updated to reflect that the facility has stated that a federal Risk Management Plan pursuant to section 112(r) is currently not required. Ammonia is stored onsite; however, the amount stored is less than the threshold amount of 10,000 pounds.
- 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. 00015:
  a) Rule 54, "Sulfur Compounds"
  b) Rule 57, "Combustion Contaminants – Specific"

c) Rule 64, "Sulfur Content of Fuels"
d) Rule 68, "Carbon Monoxide"
e) Rule 74.1, "Abrasive Blasting"
f) Rule 74.2, "Architectural Coatings"
g) Rule 74.6, "Surface Cleaning and Degreasing"
h) Rule 74.6.1 "Cold Cleaners"
i) Rule 74.15.1, "Boilers, Steam Generators, and Process Heaters"
j) Rule 74.19, "Graphic Arts"
k) Rule 74.23, "Stationary Gas Turbines"
l) Rule 103, "Continuous Monitoring Systems"

Application Nos. 00015-291 and 00015-311: This permit was revised on September 26, 2005 pursuant to Application Nos. 00015-291 and 00015-311. Application No. 00015-291 was submitted on March 11, 2004 to replace the GE LM-5000 Turbine with a GE LM-6000 Turbine. Application No. 00015-311 was submitted on July 12, 2004 to add five existing emergency engines to the permit. Refer to the District Engineering Analysis of Application Nos. 00015-291 and 00015-311 for further details on these permit revisions. Refer to the Permit Revisions Table of this permit for a list of the revised sections of the Part 70 Permit.

Application No. 00015-351: Application No. 00015-351 is for the reissuance of Part 70 Permit No. 00015 for the period ending December 31, 2013. The following items summarize the changes to the permit involved in this application.

- The permittee has requested the removal of all fuel oil and propane as secondary fuels for the turbines, boiler, and furnaces. This modification has resulted in a decrease in permitted emissions and changes to the following sections of the permit:
  a) Table 3: Permitted Throughput and Consumption Limits Table
  b) Table 4: Permitted Emissions Table
  c) Attachment STRMLN15LM2500-NOx,CO
  d) Attachment STRMLN15LM2500-SOx
  e) Attachment PO00015PC2
- A 196 BHP Caterpillar diesel-fired fire pump emergency engine has been removed from the permit. This modification has resulted in a decrease in permitted emissions and changes to Table 2, Table 3, and Table 4 of the permit.
- Modifications have been made to the Exempt Equipment List (Insignificant Activities Table).
- Modifications have been made to Attachment PO00015PC3, Permit Condition No. 2 which governs the fuel and air settings for the 2X Paper Machine furnaces.
- Modifications have been made to Attachment PO00015PC4, Permit Condition No. 1 which governs the flue gas recirculation settings for the 100 MMBTU/hr Babcock & Wilcox steam boiler.
- Attachment PO00015PC6 has been revised to reflect the updated ROC mass emissions limit for the use of inks and additives used in the producing, converting, and packaging

processes. The permit previously included a mass emission limit that was reduced two percent per year beginning 1997 until 2006. Now the emissions limit is set at 60 tons per year ROC.

- The following rules have been adopted or revised and/or revisions of the rule have been adopted into the State Implementation Plan (SIP) since the previous Part 70 Permit No. 00015 reissuance:
  a) Rule 50, "Opacity"
  b) Rule 52, "Particulate Matter – Concentration (Grain Loading)"
  c) Rule 53, "Particulate Matter – Process Weight"
  d) Rule 55, "Fugitive Dust"
  e) Rule 74.6, "Surface Cleaning and Degreasing"
  f) Rule 74.9, "Stationary Internal Combustion Engines"
  g) Rule 74.19, "Graphic Arts"
  h) California Air Toxic Control Measure (ATCM) For Stationary Compression Ignition Engines

Application No. 00015-381: This permit was revised on October 11, 2012 pursuant to Application No. 00015-381 to increase the permitted emissions of carbon monoxide for the GE LM 2500 Gas Turbine. The following items summarize the changes to the permit involved in this application:

- Tables 2, 3, and 4 were updated to reflect the revisions to the carbon monoxide permitted emissions.
- Attachment PO00015PC2-rev381 (Section No. 7) was updated to reflect the revisions to the carbon monoxide permitted emisssions.
- Attachment 63ZZZZ (Section No. 6) was added to the permit to reflect requirements for 40 CFR Part 63, Subpart ZZZZ applicable to the stationary reciprocating IC engines.

Application Nos. 00015-411,-431,-441: Application No. 00015-411 is for the allowance to use a temporary boiler in place of the 100 MMBTU/hr Babcock & Wilcox boiler when the unit is being maintained. Application No. 00015-431 is for increasing the carbon monoxide (CO) pound per hour permitted emissions for the GE LM-6000 Gas Turbine. Application No. 00015-441 is for the reissuance of Part 70 Permit No. 00015 for the period ending December 31, 2018. The following items summarize the changes to the permit involved in these applications.

- Pursuant to Application No. 00015-411, an allowance for a temporary boiler in place of the 100 MMBTU/hr Babcock & Wilcox boiler was added to the permit. There are changes to reflect this addition in the following attachments:
  a) Attachment PO00015PC1
  b) Attachment PO00015PC2
  c) Attachment PO00015PC4

- Pursuant to Application No. 00015-431, the CO lb/hr permitted emissions limit for the GE LM-6000 gas turbine has been increased. The following sections of the permit have been revised to reflect this change:
  a) Table No. 4, "Permitted Emissions"
  b) Attachment PO00015PC2, Condition No. 4
- The serial number for the GE LM-6000 gas turbine has been removed from Table Nos. 2, 3, and 4 of the permit.
- The megawatt rating for the GE LM-2500 gas turbine has been corrected to 22.7 MW throughput the permit.
- A discussion of greenhouse gas emissions has been added to the Permit Summary and Statement of Basis.
- A discussion of the California Regulation for the Management of High Global Warming Potential Refrigerants for Stationary Sources has been added to the Permit Summary and Statement of Basis.
- The Insignificant Activities Table has been updated.
- Shields for the following regulations have been added to the permit:
  a) 40 CFR Part 60, Subpart IIII, "Standards of Performance for Stationary Compression Ignition Internal Combustion Engines"
  b) 40 CFR Part 63, Subpart DDDDD, "National Emissions Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters"
  c) 40 CFR Part 63, Subpart JJJJJJ, "National Emissions Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources"
- The following rules have been adopted or revised and/or revisions of the rule have been adopted into the State Implementation Plan (SIP):
  a) Rule 54, "Sulfur Compounds"
  b) Rule 74.2, "Architectural Coatings"
  c) Rule 74.11.1, "Large Water Heaters and Small Boilers"
  d) Rule 74.19, "Graphic Arts"
  e) California Air Toxic Control Measure (ATCM) For Stationary Compression Ignition Engines
  f) 40 CFR Part 63, Subpart ZZZZ, "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines" (RICE MACT)

Application No. 00015-471: Application No. 00015-471 is for the reissuance of Part 70 Permit No. 00015 for the period ending December 31, 2023. The following items summarize the changes to the permit involved in this application.

- Title V Contact phone number has been revised.
- Model numbers and serial numbers for the two 420 BHP Caterpillar emergency engines have been corrected pursuant to the latest inspection report.
- Removed the three cold cleaners from Tables 2, 3, and 4 based on their exemption from Rule 74.6. The units are exempt from permit and Rule 74.6 because they are using Clean

Air Solvents or solvents containing less than 25 grams per liter of ROC. The cold cleaners are listed on the Insignificant Activities table.

- The source testing requirements for the 2X Paper Machine furnaces in Attachment PO00015PC3 have been revised because the Hot Air Furnace and the Yankee Furnace have a shared exhaust point. The permittee has requested source testing every 24 months instead of testing every 48 months with emissions screening at the other furnace.
- A permit shield for the 100 MMBTU/hr Babcock and Wilcox boiler has been added to the permit. The shield states that the boiler is not subject to 40 CFR, Part Dc.
- The Greenhouse Gas potential to emit calculation has been revised.
- The following rules have been adopted or revised and/or revisions of the rule have been adopted into the State Implementation Plan (SIP):
  a) Rule 54, "Sulfur Compounds"
  b) Rule 74.19, "Graphic Arts"
- The following rule or regulation attachments have been revised to clarify the applicability and / or monitoring requirements:
  a) Rule 50, "Opacity"
  b) Rule 74.1, "Abrasive Blasting"
  c) Rule 74.2, "Architectural Coatings"
  d) Rule 74.6, "Surface Cleaning and Degreasing"
  e) 40 CFR Part 82, "Protection of Stratospheric Ozone"

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NOV by Facility

Since January 1, 1996

Facility selected

00015

Facility No 00015 Procter & Gamble Paper Prods.

NOV Date	NOV No	Rule Number	Comment	Settlement	Date Closed
05/03/1999	018936	29.C	Permit Condition Not Met - Gas Turbine NOx Emissions	$1,000.00	06/30/1999
03/08/2000	019149	29.C	Permit Condition Not Met - Yankee Hood Furnace NOx/CO Limits	$500.00	05/01/2000
11/26/2002	020408	29.C	Permit Condition Not Met - Failing To Maintain Liquor Flow Rate	$3,000.00	12/27/2002
06/15/2004	020088	10.A,B	Operating Without A Permit - Diesel Pump.	$5,000.00	08/10/2004
06/15/2004	020089	29.C	Permit Condition Not Met - Exceed Limit & Recordkeeping	$1,000.00	08/10/2004
06/15/2004	020090	29.C	Permit Condition Not Met - Exceed Limit, Recordkeeping.	$1,000.00	08/10/2004
04/13/2005	020727	29.C	Permit Condition Not Met - Recordkeeping	$1,000.00	05/27/2005
05/23/2005	021066	29.C.1	Permit Condition Not Met - Emergency ICEs	$15,000.00	11/11/2005
05/23/2005	021067	29.C.1	Permit Condition Not Met - Facility Maintenance Plan	$5,000.00	11/11/2005
06/06/2007	021582	74.23.B.5	Exceeding NOx Emissions - LM2500 Turbine	$0.00	05/12/2008
07/13/2010	022603	74.23.B.5	Exceeding NOx Emissions - Turbine	$1,000.00	08/17/2010
05/22/2013	023251	29.C	Exceeding NOx Emission - Gas Turbine	$0.00	06/06/2013

05/22/2013	023252	29.C	Permit Condition Not Met - Gas Turbine	$0.00	06/06/2013
05/07/2014	022592	29.C	Permit Condition Not Met - Gas Turbine	$1,000.00	05/30/2014
Total for 14 NOVs				$34,500.00	

1.c. PERIODIC MONITORING SUMMARY

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

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

1.c.1. Specific Applicable Requirements

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
74.9N7	Rule 74.9.D.3	•Annual compliance certification •Hours of operation	•Operating hours •Date, time, duration, reason for operation •Engine data	None	None	
74.15N1	Rule 74.15.B.1	•Annual compliance certification •Biennial Source Test (NO_x, CO)	•Records of source tests •Daily records of alternate fuel consumption	None	•NO_x-ARB Method 100 •CO-ARB Method 100	
74.19N1	Rules 74.19.B.1, B.2, B.3, B.4, B.5, B.7, B.8	•Maintain file of VOC data •Daily and/or monthly usage records •Annual compliance certification	•Maintain file of VOC data •Daily and/or monthly usage records	None	•VOC content and exempt compounds: EPA Method 24/SCAQMD Method 303-91 •VOC content of publication rotogravure inks: EPA Method 24A/SCAQMD Method 303-91 •ROC content of uv cured inks: ASTM Method D5403-93 •ROC content of cyanoacrylate adhesives: SCAQMD Method 316B •Alcohol content of fountain solution: SCAQMD Method 313-91	

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
74.34N2	Rule 74.34.B.6 – Maintenance Requirement	•Maintain records of combustion system maintenance in a per required plan	•Maintain records of combustion system maintenance	None	None	
103N5	Rules 103.A.2, A.4	•Monthly records of fuel consumption •Annual compliance certification with capacity factor calculation	•Monthly records of fuel consumption •Annual capacity factor calculation	None	None	
STRMLN15LM-6000-NOx	Rules 26, 74.23, 103, 40 CFR Part 60 Subpart GG	•Annual Source Test (NOx, CO, O2, NH_3, fuel HHV) •Submit test results w/in 45 days of conducting tests •CEMs for fuel consumption, NOx, CO, O2, and control system operating parameters •Report each CEM emission violation w/in 96 hours •Annual compliance certification	•Records of CEMs data •Records of maintenance operations, periodic inspections, and repairs to turbine, air pollution control system, and CEMs •Records of source test reports and any violations or limit exceedances	•Actual annual operating hours or fuel consumption •Annual source test with control system operating parameters	•NO_x-EPA Method 20 •CO - ARB Method 100 •O2 - ARB Method 100 •NH3 - BAAQMD Method ST-1B (1/20/82) •Gaseous fuel HHV - ASTM Method D1826-88	Streamlined Requirements
STRMLN15LM-2500-NOx, CO	Rules 74.23.B.1, 74.23.B.2, 74.23.B.5, 103.A.4, 40 CFR Part 60 Subpart GG, EPA PSD Permit	•Annual Source Test (NOx, CO, O2, 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 to turbine, air pollution control system, and CEMs •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	•NO_x-EPA Method 20 •CO - ARB Method 100 •O2 - ARB Method 100 •Gaseous fuel HHV - ASTM Method D1826-88	Streamlined Requirements
STRMLN15-SOx	Rules 54 and 64, 40 CFR Part 60 Subpart GG, EPA PSD Permit	•Annual compliance certification •None for PUC-quality gas •Upon request, source test for sulfur compounds at point of discharge	•None for PUC-quality gas	None	•Gaseous fuel: SCAQMD Method 307-94 •Exhaust Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A,16B, or SCAQMD Method 307-94, as appropriate	Streamlined Requirements

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
NESHAP KK	40 CFR Part 63, Subparts A and KK	•Monthly records of required measurements and calculations of HAP-containing materials used, including mass and mass fraction of HAP in material •Annual compliance certification	•Monthly records of required measurements and calculations of HAP-containing materials used, including mass and mass fraction of HAP in material	None	None	Compliance date is May 30, 1999
ATCM Engine N1 – Fire Pump Assembly Engines	California ATCM for Stationary Compression Ignition Engines – fuel requirements	•Maintain records of fuel type •Maintain records of hours of operation •Maintain records of fuel used	•Maintain records of fuel type •Maintain records of hours of operation •Maintain records of fuel used	None	None	
40CFR63ZZZZN3	RICE MACT for emergency diesel engines – oil change and inspections	•Maintenance records •Annual compliance certification	•Maintenance records	None	None	

1.c.2. Permit-Specific Conditions

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
PO00015PC1 Condition No. 1	Rule 26 General Recordkeeping	•Annual compliance certification •Monthly records of throughput and consumption	•Monthly records	None	None	
PO00015PC1 Condition No. 2	Rule 29 Exempt Solvents	•Maintain a list of solvents in use and permit exemption status	None	None	None	
PO00015PC1 Condition No. 3	Rule 29 Temporary Boiler	•Documentation of emissions •Recordkeeping of usage	•Documentation of emissions •Recordkeeping of usge	None	None	
PO00015PC2 Condition No. 1 Condition No. 3	Rule 26 Combustion Units Annual Mass Emissions Limits	•CEMs (NO_x, CO) •Monthly records of fuel consumption and emissions (ROC, PM, SOx) •Annual compliance certification	•Monthly records of fuel consumption and emissions	None	None	
PO00015PC2 Condition No. 2	Rule 26 Natural gas only	•Records of fuel consumption •Annual compliance certification	•Monthly records of fuel consumption	None	None	
PO00015PC2 Condition No. 4	Rule 29 CO lb/hr limit at LM 2500 Gas Turbine	•Source testing required by Attachment STRMLN15LM2500-NOx,CO	•Maintain source test records	None	•ARB Method 100	
PO00015PC2 Condition No. 5	Rule 29 CO lb/hr limit at LM 6000 Gas Turbine	•Source testing required by Attachment STRMLN15LM6000-NOx	•Maintain source test records	None	•ARB Method 100	
PO00015PC2 Condition No. 6	Rule 29 Temporary Boiler	•Documentation of emissions •Recordkeeping of usage	•Documentation of emissions •Recordkeeping of usage	None	None	
PO00015PC3	Rule 26 BACT Requirements 2X Furnaces	•Annual compliance certification •Records of full range of fuel and air settings every 6 months •Source test 2X Paper Machine (consisting of 70 MMBTU/Hr Hot Air Furnace and 40 MMBTU/Hr Yankee Hood Furnace) once every 24 months	•Records of fuel and air settings •Records of source tests •Records of portable analyzer readings	None	•NO_x-ARB Method 100 •CO -ARB Method 100	

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
PO00015PC4	Rule 74.15 FGR Settings B&W Boiler	•Annual compliance certification •Monthly records of FGR setting and position of mechanical linkage of fuel and air damper •Biennial Source Test (NO_x, CO)	•Records of FGR and mechanical linkage settings •Records of source tests	None	•NO_x-ARB Method 100 •CO -ARB Method 100	
PO00015PC5 Condition Nos. 1, 2, 3, 4, 5	Rule 26, 52, 53 PM Emission Limits, 40 CFR Part 64 (CAM) 1X Paper Machine 2X Paper Machine Wet Lapper	•Daily readings of scrubber pressure drop and liquor flow rate •Source test upon request •Annual compliance certification	•Records of daily readings of scrubber pressure drop and liquor flow rate •Records of excursions at 1X and 2X dry end scrubbers	•Summary of CAM excursions	PM: EPA Method 5	
PO00015PC5 Condition No. 6	Rule 26 Converting Line Room Control Requirements	•Annual Compliance Certification	None	None	None	
PO00015PC6	Rule 26 Manufacturing Chemicals Requirements	•Annual compliance certification •Monthly usage and ROC emissions records	•Monthly usage and ROC emissions records	None	None	
PO00015PC7	40 CFR Part 52.21 PSD Requirement	•Annual compliance certification	None	None	None	
PO00015PC8	Rule 26.4 ERC No. 1166	•Annual compliance certification	None	None	None	

1.c.3. General Applicable Requirements

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
50	Rule 50	•Visual inspections •Annual compliance certification, including a formal survey •Opacity readings upon request •Notification required for uncorrectable visible emissions	•All occurrences of visible emissions for periods>3min in any one hour •Annual formal survey of all emissions units	None	•Opacity - EPA Method 9	
54.B.1	Rule 54.B.1	•Annual compliance certification •Follow monitoring requirements under Rule 64 •Upon request, source test for sulfur compounds at point of discharge	None	None	•Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A,16B, or SCAQMD Method 307-941, 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 (July 20, 1994)	
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	•CARB Method 5	•Not required based on District analysis
64.B.1	Rule 64.B.1	•Annual compliance certification •None for PUC-quality gas, propane, or butane •Annual test if gas is other than PUC-quality gas, propane, or butane (submit with annual compliance certification)	•Annual fuel gas analysis if gas is other than PUC-quality gas, propane, or butane	None	•SCAQMD Method 307-94 or ASTM D1072-90	

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
64.B.2	Rule 64.B.2	•Annual compliance certification •ARB certified diesel fuel or fuel supplier's certification, or fuel test per each delivery (submit with annual compliance certification)	•Records of ARB certified diesel or Fuel supplier's certification, or fuel test per each delivery	None	•ASTM Method D4294-98 or D2622-98	
74.6	Rule 74.6	•Annual compliance certification •Maintain current solvent information •Periodic inspection of solvent cleaning activities •Upon request, solvent testing •Measurement of freeboard height and drain hole area for cold cleaners	•Records of current solvent information	None	•ROC content: EPA Test Method 24 •Identity of solvent components: ASTM E168-67, ASTM E169-87, or ASTM E260-85 •True vapor pressure or composite partial pressure: ASTM D2879-86 or other methods per Rule 74.6.G.5 •Initial boiling point: ASTM 1078-78 or published source •Spray gun active/passive solvent losses: SCAQMD Method (10-3-89)	•
74.11.1	Rule 74.11.1	•Annual compliance certification •Maintain identification records of large water heaters and small boilers	•Records of current information of large water heaters and small boilers	None	None	•Rule only applies to the installation of large water heaters and small boilers
74.22	Rule 74.22	•Annual compliance certification •Maintain furnace identification records	•Records of current furnace information	None	None	•Rule only applies to future installation of natural gas-fired, fan-type furnaces

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

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
74.1	Rule 74.1	•Annual compliance certification •Monitor abrasive blasting operations •Abrasive blasting records	•Abrasive blasting records	None	•Visible emission evaluation-Section 92400 of CCR	
74.2	Rule 74.2	•Annual compliance certification •Periodic inspections •Maintain VOC records of coatings used	•Maintain VOC records of coatings used	None	•VOC content-EPA Method 24, SCAQMD Method 304-91 •See Rule 74.2.G	
74.28	Rule 74.28	•Annual compliance certification •Visual inspection to ensure proper vapor control during roofing kettle operation	None	None		
40CFR61.M	40 CFR Part 61, Subpart M	•Annual compliance certification •See 40 CFR Part 61.145 for inspection procedures	•See 40 CFR Part 61.145 for recordkeeping procedures	•See 40 CFR Part 61.145 for notification procedures	•See 40 CFR Part 61.145 for test methods	

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2. PERMITTED EQUIPMENT AND APPLICABLE REQUIREMENTS TABLE

Purpose

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

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

Equipment Description

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

Applicable Requirements

The applicable requirements portion of the table is a matrix of applicability for the specific requirements that apply to the listed emissions units. The columns are labeled with APCD rule numbers or references to federal requirements. An "X" in the row corresponding to the emissions unit indicates the requirement is specifically applicable to that unit. For cases where a rule has multiple compliance options, a number appears instead of an "X". The number is a code key that corresponds to the "Title V Applicable Requirement Code Key" attached to the table. The code key table contains specific citations for the portions of the rule that are applicable. The code key is also used to identify the permit attachment in Section No. 6, "Specific Applicable Requirements", that contains the associated permit conditions. For example, code key "1" under Rule 74.15 is associated with Attachment 74.15N1 in Section No. 6. Please note that the permit does not include specific condition attachments "74.23N11", "74.23N12", or "103N4". Also the permit does not include specific permit attachments for Rules 54, 64, 40 CFR 60 Subpart GG, and the EPA PSD Permit NSR 4-4-9, LA 79-08. The permit conditions for these requirements are listed in the permit in Attachments "STRMLN15.LM5000-NOx,CO,NH_3", "STRMLN15.LM2500-NOx,CO", and "STRMLN15-SOx".

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.

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TABLE NO. 2

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
Permit to Operate No. 00015
Permitted Equipment and Applicable Requirements

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Equipment	54	64	74.9	74.15	74.19	74.23	74.34	103	ATCM for CI Engines	NESHAP 63ZZZZ	40 CFR 60 GG	40 CFR 63 KK	EPA PSD PERMIT	Additional Requirements
1 - 49.9 MW GE NG Cogen Turbine LM-6000, Model 7LM6000PC-NGWG23, w/ Steam Inj., Cormetech Model CM-33 SCR w/ NH3 Inj., and Emerachem ADCAT Oxidation Catalyst	X	X				12		4			X			PC1, PC2, PC7
1 - 22.7 MW GE NG Cogen Turbine w/ Water Inj., LM-2500	X	X				11		4			X		X	PC1, PC2, PC7
1 - 100 MMBTU/Hr Babcock & Wilcox Model FM 1854 NG Steam Boiler w/ FGR and loNOx Coen burner, Model 675/DAF-32				1				5						PC1, PC2, PC4, PC7
1 - 1X Paper Machine Including:														PC5
1 - 150 MMBTU/Hr NG Hot Air Furnace							2							PC1, PC2, PC7
1 - "Yankee" Drying Hood w/ (2) 14 MMBTU/Hr NG AER Corp. Burners							2							PC1, PC2, PC7
1 - Dry End Venturi Scrubber, Anderson 2000 Series, Model No. WAF170 (Stack No. S-5)														
1 - Dryer Exhaust Stack (S-4A)														
1 - Dryer Exhaust Stack (S-4B)														
1 - Vacuum Exhaust Stack (S-4C)														
1 - Wet End Exhaust Stack (S-4D)														
1 - Broke Pulper Vent (S-4E)														
1 - 2X Paper Machine Including:														PC5
1 - Dryer Furnace w/ (1) 70 MMBTU/Hr NG Coen Co. LoNOx Burner							2							PC1, PC2, PC3
1 - "Yankee" Trim Furnace w/ (1) 40 MMBTU/Hr NG Coen Co. LoNOx Burner							2							PC1, PC2, PC3
1 - Dry End Venturi Scrubber, Anderson 2000 Series, Model No. WAF170 (Stack No. S-6)														
1 - Dryer Exhaust Stack (S-7A)														
1 - Vacuum Exhaust Stack (S-7C)														
1 - Wet End Exhaust Stack (S-7D)														
1 - Broke Pulper Vent (S-7E)														
1 - Wet Lapper w/ Venturi Scrubber, Anderson 2000 Series, Model No. WAF113 (Stack S-1)														PC5
1 - KRT/TT Converting Line Room														PC5
Additive and Ink Applications					1							X		PC1, PC6
Emergency Engines - used for fire suppression														
1 - 420 BHP Caterpillar Diesel-Fired Emergency Standby Engine, Model 3406B DI, Serial No. 6TB08444, ID: Utility Yard Pump #2			7						1	3				PC1
1 - 420 BHP Caterpillar Diesel-Fired Emergency Standby Engine, Model 3406B DI, Serial No. 6TB10913, ID: Utility Yard Pump #3			7						1	3				PC1
1 - 210 BHP Clarke Detroit Diesel Allison, Inc. Diesel-Fired Emergency Standby Engine, Model JU6HUF50, Serial No. PE6068T185639, ID: Warehouse Pump #1			7						1	3				PC1
1 - 210 BHP Clarke Detroit Diesel Allison, Inc. Diesel-Fired Emergency Standby Engine, Model JU6HUF50 L1211H, Serial No. PE6068T157094, ID: Warehouse Pump #2			7						1	3				PC1

PART 70 PERMIT NO. 00015
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 – NOx control technology primarily used for boilers
FO	Fuel Oil
GE	General Electric
Gal	Gallon
HAP	Hazardous Air Pollutant
Lb ROC/Gal	Pound(s) of ROC per gallon
LPG	Liquid Petroleum Gas ("Propane")
MMBTU	The heat input of a combustion device as measured in millions British Thermal Units
MW	MegaWatt
NESHAPS	National Emission Standards for Hazardous Air Pollutants

NH_3	Ammonia
NG	Natural Gas
NOx	Oxides of Nitrogen
NSPS	New Source Performance Standard
PM	Particulate Matter
ROC	Reactive Organic Compound
SCAQMD	South Coast Air Quality Management District
SCFM	Standard cubic feet per minute
SCR	Selective Catalytic Reduction for NOx control
SIP	State Implementation Plan
SOx	Sulfur Oxides
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

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PART 70 PERMIT NO. 00015
TITLE V APPLICABLE REQUIREMENT CODE KEY

Rule 74.9, "Stationary Internal Combustion Engines"

1. Pre-January 1, 2002 emissions limits for rich-burn engines (increments of progress have passed)
2. Pre-January 1, 2002 emissions limits for lean-burn engines (increments of progress have passed)
3. Natural gas-fired rich-burn engines (74.9.B.1 or 74.9.B.2)
4. Natural gas-fired lean-burn engines (74.9.B.1 or 74.9.B.2) with ammonia emission limit, if applicable. (74.9.B.5)
5. Diesel engines. (74.9.B.1 or 74.9.B.2) with ammonia emission limit, if applicable. (74.9.B.5)
6. Exemption from Rule 74.9 for engines operated less than 200 hours per calendar year (74.9.D.2)
7. Exemption from Rule 74.9 for emergency standby engines operated during either an emergency or maintenance operation. (74.9.D.3)
8. Exemption from Rule 74.9 for diesel engines with a permitted capacity factor of less than or equal to 15%. (74.9.D.8)
9. Exemption from Rule 74.9 for diesel engines used to power cranes and welding equipment. (74.9.D.9)
10. Exemption from Rule 74.9 for diesel engines operated on San Nicolas Island. (74.9.D.10)

Rule 74.15, "Boilers, Steam Generators and Process Heaters"

1. NOx and CO emission limits for units with an annual heat input rate greater than or equal to 9,000 MMBTU per calendar year (74.15.B.1)
2. Tuning and fuel metering requirements for units with an annual heat input rate of less than 9,000 MMBTU per calendar year. (74.15.B.2 and 74.15.D.1)

Rule 74.19, "Graphic Arts"

1. Requirements for ROC-containing inks, coatings, adhesives, fountain solutions, or solvents used in graphic arts facilities that are not equipped with a ROC emission capture and control system (74.19.B.1, 74.19.B.2, 74.19.B.3, 74.19.B.4, 74.19.B.5, 74.19.B.7, and 74.19.B.8)
2. Requirements for ROC-containing inks, coatings, adhesives, fountain solutions, or solvents used in graphic arts facilities that are equipped with a ROC emission capture and control system (74.19.B.2, 74.19.B.3, 74.19.B.4, 74.19.B.5, 74.19.B.6, 74.19.B.7, and 74.19.B.8)

Rule 74.23, "Stationary Gas Turbines"

1. NO_x and NH_3 emission limit for turbines rated at 0.3 MW to less than 2.9 MW (74.23.B.1 and 74.23.B.4) Requirement to monitor operating parameters. (74.23.B.2.a and b)

2. NO_x and NH_3 emission limit for turbines rated at 2.9 MW to less than 10.0 MW. (74.23.B.1 and 74.23.B.4) Requirement to monitor operating parameters. (74.23.B.2.a and b)
3. NO_x and NH_3 emission limit for turbines rated at 10.0 MW and higher, with SCR, and operated less than 4,000 hr/yr (74.23.B.1 and 74.23.B.4) Requirement to monitor operating parameters. (74.23.B.2.a and b)
4. NO_x and NH_3 emission limit and CEMS requirement for turbines rated at 10.0 MW and higher, with SCR, and operated more than 4,000 hr/yr (74.23.B.1, 74.23.B.2, and 74.23.B.4)
5. NO_x emission limit for turbines rated at 10.0 MW and higher, without SCR, and operated less than 4,000 hr/yr (74.23.B.1) Requirement to monitor operating parameters. (74.23.B.2.a and b)
6. NO_x emission limit and CEMS requirement for turbines rated at 10.0 MW and higher, without SCR, and operated more than 4,000 hr/yr (74.23.B.1 and 74.23.B.2)
7. NO_x emission limit for turbines rated at 4.0 MW and higher, operated less than 877 hr/yr (74.23.B.1) Requirement to monitor operating parameters. (74.23.B.2.a and b)
8. Exemption from the requirements of 74.23.B, for turbines operated less than 200 hrs per calendar year (74.23.C.1.c)
9. Exemption from the requirements of 74.23.B, for emergency standby units operated during either an emergency or maintenance operation. (74.23.C.1.d)
10. Equipment is currently shut-down and not operating. Upon operation will install non-resettable totalizing hour meter (74.23.D.2). Exempt from the requirements of 74.23.B as long as turbine is operated less than 200 hrs per calendar year (74.23.C.1.c)
11. NO_x emission limit and CEMS requirement for turbines rated at over 20 MW, equipped with water injection only, where exhaust gases are used to dry paper, and operated more than 4,000 hr/yr (74.23.B.2 and 74.23.B.5)
12. NO_x emission limit and CEMS requirement for turbines rated at over 39 MW, equipped with steam injection and SCR, where exhaust gases are used to dry paper, and operated more than 4,000 hr/yr (74.23.B.2 and 74.23.B.6)

Rule 74.34, "NOx Reductions From Miscellaneous Sources"

1. NOx and CO emissions limits, source testing requirements, and maintenance requirements (74.34.B.1, 74.34.B.5, 74.34.B.6)
2. Unit is exempt from emission limits, maintenance requirements only (74.34.C.2, 74.34.B.6)

Rule 103, "Stack Monitoring"

1. CEM requirements for an emission source required by a federal regulation to install, maintain, and operate a continuous monitoring system (103.A.1)
2. CEM requirements for boilers, steam generators, and process heaters with a heat input capacity of between 40 MMBTU/Hr and 250 MMBTU/Hr, and a capacity factor of at least 30% (103.A.2)

3. CEM requirements for gas-fired boilers, steam generators, and process heaters with a heat input capacity of 250 MMBTU/Hr or more (103.A.3)
4. CEM requirements for any equipment which emits 5 lb/hr or 40 lb/day or more of any single air contaminant (103.A.4)
5. Exemption from the requirements of Rule 103, for boilers, steam generators, and process heaters with a heat input capacity of between 40 MMBTU/Hr and 250 MMBTU/Hr, and a capacity factor of less than 30% (103.A.2 and 103.A.4)

Section 93115, Title 17, California Code of Regulations California Airborne Toxic Control Measure For Stationary Compression Ignition (CI) Engines

1. In-use emergency fire pump assembly engines
2. In-use emergency engines operated not more than 20 hours per year for maintenance and testing purposes.
3. Engines operated solely on OCS Platforms
4. In-use emergency engines – 50 hours per year
5. Emergency engines installed after January 1, 2005

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

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

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. 00015
Permitted Throughput/Consumption Limits

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Equipment		Throughput/Consumption Permit Limit	District (D)/ Federal(F) Enforceable	Calculation Throughput
1 - 49.9 MW GE NG Cogen Turbine LM-6000, Model 7LM6000PC-NGWG23, w/ Steam Inj., Cormetech Model CM-33 SCR, w/ NH3 inj., and Emerachem ADCAT Oxidation Catalyst	NOx	132.88	F	3460.2 MMCF/Yr NG
	CO	284.93 TPY+	F	**
	ROC	16.82	F	3795 MMCF/Yr NG
	PM	21.25	F	**
	SOx	2.03	F	**
	NH3			**
1 - 22.7 MW GE NG Cogen Turbine w/ Water Inj., LM-2500	NOx	* +		1799.0 MMCF/Yr NG
	CO	* +		1865.0 MMCF/Yr NG
	ROC	*		2228 MMCF/Yr NG
	PM	*		**
	SOx	*		**
1 - 100 MMBTU/Hr Babcock & Wilcox Model FM 1854 NG Steam Boiler w/ FGR and loNOx Coen burner, Model 675/DAF-32				117.8 MMCF/Yr NG
	NOx	*		
	CO	*		
	ROC	*		
	PM	*		
	SOx	*		
1 - 1X Paper Machine Including:				
1 - 150 MMBTU/Hr NG Hot Air Furnace	NOx	*		24.55 MMCF/Yr NG
	CO	*		0.00 MMCF/Yr NG
	ROC	*		0.00 MMCF/Yr NG
	PM	*		0.00 MMCF/Yr NG
	SOx	*		0.00 MMCF/Yr NG
1 - "Yankee" Drying Hood w/ (2) 14 MMBTU/Hr NG AER Corp. Burners				234 MMCF/Yr NG
	NOx	*		
	CO	*		
	ROC	*		
	PM	*		
	SOx	*		
1 - Dry End Venturi Scrubber, Anderson 2000 Series, Model No. WAF170 (Stack No. S-5)				
1 - Dryer Exhaust Stack (S-4A)				
1 - Dryer Exhaust Stack (S-4B)				
1 - Vacuum Exhaust Stack (S-4C)				
1 - Wet End Exhaust Stack (S-4D)				
1 - Broke Pulper Vent (S-4E)				
1 - 2X Paper Machine Including:				
1 - Dryer Furnace w/ (1) 70 MMBTU/Hr NG Coen Co. LoNOx Burner				365.7 MMCF/Yr NG
	NOx	*		
	CO	*		
	ROC	*		
	PM	*		
	SOx	*		
1 - "Yankee" Trim Furnace w/ (1) 40 MMBTU/Hr NG Coen Co. LoNOx Burner				**
	NOx	*		
	CO	*		
	ROC	*		
	PM	*		
	SOx	*		
1 - Dry End Venturi Scrubber, Anderson 2000 Series, Model No. WAF170 (Stack No. S-6)				
1 - Dryer Exhaust Stack (S-7A)				
1 - Vacuum Exhaust Stack (S-7C)				
1 - Wet End Exhaust Stack (S-7D)				
1 - Broke Pulper Vent (S-7E)				
1 - Wet Lapper w/ Venturi Scrubber, Anderson 2000 Series, Model No. WAF113 (Stack S-1)				
1 - KRT/TT Converting Line Room				
Additive and Ink Applications		60.0 TPY	F	60.0 TPY

TABLE NO. 3

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
Permit to Operate No. 00015
Permitted Throughput/Consumption Limits

M: TITLEV TV Permits PO0015 PERMITV Tables 0015 REV-471 Equipment	Throughput/Consumption Permit Limit	District (D)/ Federal(F) Enforceable	Calculation Throughput
Emergency Engines - used for fire suppression			
1 - 420 BHP Caterpillar Diesel-Fired Emergency Standby Engine, Model 3406B DI, Serial No. 6TB08444, ID: Utility Yard Pump #2	50 hr/yr ****	F	50 hr/yr
1 - 420 BHP Caterpillar Diesel-Fired Emergency Standby Engine, Model 3406B DI, Serial No. 6TB10913, ID: Utility Yard Pump #3	50 hr/yr ****	F	50 hr/yr
1 - 210 BHP Clarke Detroit Diesel Allison, Inc. Diesel-Fired Emergency Standby Engine, Model JU6HUF50, Serial No. PE6068T185639, ID: Warehouse Pump #1	50 hr/yr ****	F	50 hr/yr
1 - 210 BHP Clarke Detroit Diesel Allison, Inc. Diesel-Fired Emergency Standby Engine, Model JU6HUF50 L121IH, Serial No. PE6068T157094, ID: Warehouse Pump #2	50 hr/yr ****	F	50 hr/yr

\+ - As Measured by the Continuous Emissions Monitor
* - Included in Limit Above for Same Criteria Pollutant
** - Included in the Throughput Above
**** - 50 hr/yr is for maintenance and testing. Actual emergency use is unlimited.

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

TABLE NO. 4

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
Permit to Operate No. 00015
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
1 - 49.9 MW GE NG Cogen Turbine LM-6000, Model 7LM6000PC-NGWG23, w/ Steam Inj., Cormetech Model CM-33 SCR w/ NH3 Inj., and Emerachem ADCAT Oxidation Catalyst	5.10	16.71	5.84	1.14	24.41	54.19	1.21	4.35	1.39	0.27	10.20	12.85
1 - 22.7 MW GE NG Cogen Turbine w/ Water Inj., LM-2500	9.75	83.41	12.15	0.67	223.80		2.41	25.50	3.00	0.17	180.13	
1 - 100 MMBTU/Hr Babcock & Wilcox Model FM 1854 NG Steam Boiler w/ FGR and loNOx Coen burner, Model 675/DAF-32	0.32	3.00	0.45	0.04	18.26		0.52	4.85	0.72	0.06	29.51	
1 - 1X Paper Machine Including:												
1 - 150 MMBTU/Hr NG Hot Air Furnace	*	2.70	*	*	*		0.79	31.44	1.09	0.09	12.00	
1 - "Yankee" Drying Hood w/ (2) 14 MMBTU/Hr NG AER Corp. Burners	0.64	11.70	0.89	0.07	9.83		0.15	2.80	0.21	0.02	2.35	
1 - Dry End Venturi Scrubber, Anderson 2000 Series, Model No. WAF170 (Stack No. S-5)			29.57						6.75			
1 - Dryer Exhaust Stack (S-4A)			***						***			
1 - Dryer Exhaust Stack (S-4B)			***						***			
1 - Vacuum Exhaust Stack (S-4C)			***						***			
1 - Wet End Exhaust Stack (S-4D)			***						***			
1 - Broke Pulper Vent (S-4E)			***						***			
1 - 2X Paper Machine Including:												
1 - Dryer Furnace w/ (1) 70 MMBTU/Hr NG Coen Co. LoNOx Burner	1.01	15.36	1.92	0.11	8.63		0.58	8.80	1.10	0.06	4.95	
1 - "Yankee" Trim Furnace w/ (1) 40 MMBTU/Hr NG Coen Co. LoNOx Burner	**	**	**	**	**		**	**	**	**	**	
1 - Dry End Venturi Scrubber, Anderson 2000 Series, Model No. WAF170 (Stack No. S-6)			17.48						3.99			
1 - Dryer Exhaust Stack (S-7A)			***						***			
1 - Vacuum Exhaust Stack (S-7C)			***						***			
1 - Wet End Exhaust Stack (S-7D)			***						***			
1 - Broke Pulper Vent (S-7E)			***						***			
Permitted Emissions Subtotal	16.82	132.88	68.30	2.03	284.93	54.19	5.66	77.74	18.25	0.67	239.14	12.85
1 - Wet Lapper w/ Venturi Scrubber, Anderson 2000 Series, Model No. WAF113 (Stack S-1)			0.44						0.10			
1 - KRT/TT Converting Line Room			0.00						0.00			
Additive and Ink Applications	60.00						20.00					
Emergency Engines - used for fire suppression												
1 - 420 BHP Caterpillar Diesel-Fired Emergency Standby Engine, Model 3406B DI, Serial No. 6TB08444, ID: Utility Yard Pump #2	0.02	0.35	0.02	0.01	0.08		0.25	3.49	0.25	0.06	0.76	
1 - 420 BHP Caterpillar Diesel-Fired Emergency Standby Engine, Model 3406B DI, Serial No. 6TB10913, ID: Utility Yard Pump #3	0.02	0.35	0.02	0.01	0.08		0.25	3.49	0.25	0.06	0.76	
1 - 210 BHP Clarke Detroit Diesel Allison, Inc. Diesel-Fired Emergency Standby Engine, Model JU6HUF50, Serial No. PE6068T185639, ID: Warehouse Pump #1	0.00	0.08	0.00	0.00	0.01		0.03	0.79	0.01	0.03	0.05	
1 - 210 BHP Clarke Detroit Diesel Allison, Inc. Diesel-Fired Emergency Standby Engine, Model JU6HUF50 L1211H, Serial No. PE6068T157094, ID: Warehouse Pump #2	0.00	0.08	0.00	0.00	0.01		0.03	0.79	0.01	0.03	0.05	
Total Permitted Emissions	76.86	133.74	68.78	2.05	285.11	54.19	26.22	86.30	18.87	0.85	240.76	12.85

* - Included in other combustion permitted emissions
** - Included in 2X dryer furnace permitted emissions
*** - Included in 1X or 2X dry end venturi scrubber permitted emissions

HAP Emissions Ref.: AB 2588 Air Toxics Report Reporting Year: 2016 Submittal Date: 2/2017

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. 00015

INSIGNIFICANT ACTIVITIES (EXEMPT EMISSION UNITS)	BASIS FOR EXEMPTION (Size/Production Rate)	RULE 23 CITATION
2 - Fire Pump Diesel Fuel Tanks (300 Gallons each) Location: Utility Yard	Reactive organic compound liquid with a modified Reid vapor pressure of 0.5 psia or less	23.F.21
3 – Solvent free, unheated Parts Cleaners Location: Papermaking, Converting, Logistics	Cold cleaners using cleaning agents certified by SCAQMD as Clean Air Solvents or 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	23.F.10.a and b
2 – Fire Pump Diesel Fuel Tanks (300 Gallons each) Location: Warehouse	Reactive organic compound liquid with a modified Reid vapor pressure of 0.5 psia or less	23.F.21
2 – Scrubbers associated with the converting room	Hygiene dust control with no emissions to the atmosphere	NA – No emissions
2 – Osprey Drum Filters associated with the converting room	Hygiene dust control with no emissions to the atmosphere	NA – No emissions
1 – Outdoor Covered Sveen (extracts paper fines from process water)	Covered process water	NA – No emissions
2 – Dust Control Baghouses associated with Converting Rooms	Hygiene dust control with no exhaust to the atmosphere	NA – No emissions
3 – Cooling Towers	Cooling towers that are not in contact with process water.	23.J.10

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.

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

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

Applicability:

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

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

Conditions:

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

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

2. Pursuant to Section D.3 of Rule 74.9, each emergency standby engine shall be equipped with an operating, non-resettable, elapsed hour meter.

3. Pursuant to Section F.1 of Rule 74.9, the Annual Compliance Certification shall include the following records for each emergency standby engine: Engine manufacturer, model number, operator identification number, and location.

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

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Ventura County Air Pollution Control District
Rule 74.15.B.1 Applicable Requirements
Boilers, Heater Treaters, Steam Generators, and Process Heaters
NOx and CO Emission Limits
Annual Heat Input ≥ 9,000 MMBTU

Rule 74.15, "Boilers, Steam Generators, and Process Heaters"
Adopted 11/08/94, Federally-Enforceable

Applicability:

This attachment applies to boilers, heater treaters, steam generators and process heaters with a maximum heat input rating of greater than or equal to 5 MMBTU/Hr that have operated with an annual heat input rate of greater than or equal to 9,000 MMBTU during any twelve (12) calendar month rolling period. This attachment also applies to any unit operated with an annual heat input rate of less than 9,000 MMBTU that is equipped with low NOx burners or other such equipment to comply with the NOx and CO requirements of Rule 74.15.B.1. A heat input of 9,000 MMBTU is equivalent to 90,000 therms and equivalent to 8.57 million cubic feet of natural gas at a higher heating value of 1,050 BTU/cf.

A boiler, steam generator or process heater is any external combustion equipment fired with liquid and/or gaseous fuel. A boiler or a steam generator is further defined as equipment used to produce steam or to heat water. Boiler or steam generator does not include any unfired waste heat recovery boiler that is used to recover sensible heat from the exhaust of any combustion equipment. A process heater is further defined as equipment that transfers heat from combustion gases to water or process streams. Process heater does not include any kiln or oven used for drying, baking, cooking, calcinating or vitrifying, or any fuel-fired degreasing or metal finishing equipment. Annual heat input is defined as the actual amount of heat released by fuels burned in a unit during a twelve (12) calendar month rolling period, based on the higher heating value of the fuel. The annual heat input shall be calculated as the sum of the previous 12 monthly fuel use rates multiplied by the higher heating value of the fuel.

Conditions:

1. Pursuant to Rule 74.15.B.1, emissions from an applicable emission unit shall not exceed the following limits:

   a. Oxides of Nitrogen (NOx expressed as NO_2): 40 ppmvd
   b. Carbon Monoxide (CO): 400 ppmvd

   These limits shall be referenced at three (3) percent volume stack gas oxygen on a dry basis averaged over 15 consecutive minutes. Compliance with this condition shall be verified every 24 months by source testing.

2. Pursuant to Rule 74.15.B.1, an applicable emission unit shall be source tested not less than once every 24 months (biennially) utilizing the following methods as detailed in Rule 74.15.E:

a.	NOx	ARB Method 100
b.	CO	ARB Method 100
c.	Stack Gas Oxygen	ARB Method 100

Pursuant to Rule 74.15.E.2, emission tests shall be conducted on units in "as-found" operating condition. However, no emission test for Rule 74.15 shall be conducted during start-up, shutdown or under breakdown conditions. Prior to conducting a biennial emissions test, permittee shall notify the District Compliance Division. Written notification, and a source test protocol subject to District approval, shall be received no less than 15 calendar days prior to the test. The emissions test report and results shall be submitted to the District Compliance Division within 45 days after the test.

3. Pursuant to Rule 74.15.C.2, the emission limits of Rule 74.15.B.1 shall not apply to any unit operated on alternate fuel under the following conditions:

a. Alternate fuel is required due to the curtailment of natural gas service to the individual unit by the natural gas supplier. Alternate fuel use in this case shall not exceed the period of natural gas curtailment.

b. Alternate fuel use is required to maintain the alternate fuel system. Alternate fuel use in this case shall not exceed 50 hours per year.

4. Pursuant to Rule 74.15.C.4, the emission limits of Rule 74.15.B.1 shall not apply during the cold startup of an applicable unit. For units with a rated heat input capacity of equal to, or greater than, one hundred (100) million BTUs per hour, the duration of this exemption shall not exceed three (3) hours. For units with a rated heat input capacity of less than one hundred (100) million BTUs per hour, the duration of this exemption shall not exceed one (1) hour.

5. Permittee shall record and maintain the following information:

a. Daily records of alternate fuel consumption as required by Rule 74.15.D.3. Each record shall include the type of fuel, the quantity of fuel, and the duration of the occurrence; and

b. The biennial source test report.

This information shall be submitted to the District upon request.

6. If the emission unit is equipped with an external flue gas recirculation (FGR) system for the control of nitrogen oxides, permittee shall also comply with the FGR monitoring and recordkeeping requirements in the Permit Specific Conditions (Attachments) presented in Section No. 7 of this permit.

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Ventura County Air Pollution Control District
Rule 74.19 Applicable Requirements
Graphic Arts Operations Without an Emission Capture and Control System

Rule 74.19, "Graphic Arts"
Adopted 06/14/11, Federally Enforceable

Applicability:

This attachment applies to any stationary source that applies ink, coating, adhesive, fountain solution, or solvent containing Reactive Organic Compounds (ROC) as part of a graphic arts operation. Pursuant to Rule 74.19.C.1.a, this attachment does not apply to a stationary source which emits less than 200 pounds of ROC in any rolling period of 12 consecutive calendar months from graphic arts operations. This attachment does not apply to graphic arts applications which are equipped with an emission capture and control system pursuant to Section B.6 of Rule 74.19. This attachment does not apply to screen printing; operations which apply any ROC-containing ink, coating, or adhesive on ceramic materials; circuit board printing; operations using darkroom equipment associated with lithographic printing plate making; operations which apply inks used to indicate that sterilization has occurred; and ink jet printing.

Pursuant to Rule 74.19.G.20, a "Graphic Arts Operation" is defined as any packaging gravure, publication gravure, flexographic printing, screen printing, letterpress, ink jet, laser jet, or lithographic printing operation, or any coating or laminating operation manufacturing converted flexible packaging materials for the packaging industry. These operations include printing application equipment, coating equipment, laminating equipment, flash-off areas, ovens, conveyors, or other equipment in an uninterrupted series with such operation.

Conditions:

1. Pursuant to Rule 74.19.B.1, no person shall apply the following inks, coatings, or adhesives with an ROC content in excess of the following limits:

Category	ROC Limits Grams of ROC per Liter (Pounds of ROC per Gallon) of Coating, Ink, or Adhesive, Less Water and Exempt Organic Compounds
Inks	300 (2.5)
Flexographic Inks on Porous Substrates	225 (1.88)
Coatings	300 (2.5)
Adhesives	150 (1.25)

For low-solids inks, coatings or adhesives, which have 120 grams per liter (1 pound per gallon) or less of solids, the ROC content is on a grams per liter of material basis.

2. Pursuant to Rule 74.19.B.2, no person shall apply any fountain solution with an ROC

content in excess of any of the following limits:

FOUNTAIN SOLUTION LIMITS BY PRINTING METHOD	LIMITS ROC CONTENT (Percent by weight – applied)	LIMITS ROC CONTENT (Grams per Liter - applied)
a. HEATSET WEB-FED OFFSET LITHOGRAPHIC PRINTING		
1) If no refrigeration and contains alcohol:	1.6	16
2) If refrigerated below 55°F and contains alcohol	3.0	30
3) If no alcohol in fountain solution	5.0	50
b. NON-HEATSET WEB-FED OFFSET LITHOGRAPHIC PRINTING (Use of alcohol prohibited in this fountain solution)	5.0	50
c. SHEET-FED LITHOGRAPHIC PRINTING if maximum sheet size is greater than 11X17 inches or if total solution reservoir is greater than one gallon:		
1) If no refrigeration and contains alcohol	5.0	50
2) If refrigerated below 55°F and contains alcohol	8.5	85
3) If no alcohol in fountain solution	5.0	50
d. ALL OTHER PRESSES NOT LISTED ABOVE		
1) If no refrigeration	8.0	80
2) If refrigerated below 55°F	10.0	100

The ROC content of fountain solutions is based on the ROC weight divided by the full weight of the applied solution including any exempt compounds.

Any refrigerated chiller used shall be equipped with a visible or easily accessible temperature gauge, and the sensor shall measure the fountain solution temperature at the supply tank connected to the operating press.

No person shall use any fountain solution that contains alcohol in any Non-Heatset web-fed offset lithographic printing operation.

3. Pursuant to Rule 74.19.B.3, no person shall use a solvent to perform solvent cleaning in excess of the applicable ROC content limits set forth below:

SOLVENT CLEANING ACTIVITY	LIMITS ROC Content (as applied) Grams of ROC per Liter of Material g/l (lb/gal)
a. Surface Preparation of Substrate	25 (0.21)
b. Repair and Maintenance Cleaning	25 (0.21)
c. Other Press Parts	25 (0.21)
d. Cleaning of Coatings or Adhesives Application Equipment	25 (0.21)
e. Cleaning of Ink Application Equipment	
1) General, unless listed below	25 (0.21)
2) Flexographic Printing	
a) Specialty Flexographic	100 (0.83)
b) Other Flexographic	25 (0.21)
3) Gravure Printing	
a) Publication	100 (0.83)
b) Packaging	25 (0.21)
4) Lithographic or Letter Press Printing	
a) Roller Wash	100 (0.83)
b) Blanket Wash	100 (0.83)
c) Metering Roller Cleaner	100 (0.83)
d) Plate Cleaner	100 (0.83)
e) Removable Press Components	25 (0.21)
5) Radiation Curing Ink Removal	100 (0.83)

4. Pursuant to Rule 74.19.B.4, no person shall use a solvent for cleaning purposes if that cleaner contains any methylene chloride.

5. Pursuant to Rule 74.19.B.5, no person shall perform cleaning operations unless one of the following cleaning devices or methods is used:

   a. Wipe cleaning;

   b. Remote reservoir cold cleaner;

   c. Spray bottles or containers with a maximum capacity of 16 fluid ounces from which solvents are applied without propellant-induced force;

   d. Cleaning equipment utilizing a closable solvent container. The solvent container shall remain closed during cleaning operations, except when depositing and removing objects to be cleaned, and during nonoperation, except when performing maintenance and repair to the cleaning equipment.

      1) If a solvent flow method is used, the solvent shall not be atomized.

      2) If a solvent flushing method is used, the solvent shall be flushed through

the system by pumping.

6. Pursuant to Rule 74.19.B.7, all ROC-containing materials shall be stored in closed containers that are nonabsorbent and do not leak. Pursuant to Rule 74.19.G.53, "ROC-Containing materials" is defined as inks, coatings, adhesives, materials used for cleanup or of ink, coating, or adhesive removal, solvent, paper and cloth, and waste containing, impregnated with, coated with, or mixed with Reactive Organic Compounds.

7. Pursuant to Rule 74.19.B.8, ROC material wastes shall be disposed of in a manner consistent with Federal, State, and local hazardous waste regulations.

8. Pursuant to Rule 74.19.D, the permittee shall record and maintain the following information:

   a. A current file for each ink, coating, and adhesive in use and in storage. The file shall include a data sheet or material list that provides material name, manufacturer identification, applicable product category from Subsection B.1, specific mixing instructions, and grams of ROC per liter (or pound of ROC per gallon) of coating (or ink or adhesive) less water and less exempt organic compounds, and grams of ROC per liter (or pounds of ROC per gallon) of material. (Rule 74.19.D.1)

   b. A current file for each fountain solution and cleaning solvent in use and in storage. The file shall include a data sheet or material list that provides material name, manufacturer identification, applicable solvent cleaning activity from Subsection B.3 for each cleaning solvent, specific mixing instructions if any, and grams of ROC per liter (or pounds of ROC per gallon) of material. The required data sheets for fountain solutions shall provide the ROC content, and minimum recommended dilution, which can be used to calculate the ROC content percent by weight, as applied or ROC content, grams per liter of material, applied. (Rule 74.19.D.2)

   c. Daily records showing the amount of inks, coatings, adhesives, fountain solutions, and solvents used. If only compliant inks, coatings, adhesives, fountain solutions, and solvents are used, these records may be maintained on a monthly basis instead of a daily basis. (Rule 74.19.D.3)

   Records shall be maintained at the facility and shall be made available to District personnel upon request. (Rule 74.19.D.6)

9. Pursuant to Rule 74.19.E, compliance with Rule 74.19 shall be determined using the following methods as applicable. These methods shall be performed upon District request:

   a. Measurement of the ROC and/or solids content of inks, coatings, adhesives, fountain solutions, and solvents, except publication rotogravure inks, shall be conducted and reported in accordance with EPA Reference Method 24,

Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings, and SCAQMD Method 303-91, Determination of Exempt Compounds, Revised February 1993 (EPA Approved August 1996), for determination of exempt compounds as necessary. (Rule 74.19.E.1)

b. Measurement of the ROC content of publication gravure inks shall be conducted and reported in accordance with EPA Reference Method 24A, Publication Rotogravure Inks and Coatings, and SCAQMD Method 303-91, Determination of Exempt Compounds, Revised February 1993 (EPA Approved August 1996) for determination of exempt compounds as necessary. (Rule 74.19.E.2)

c. If applicable, measurement of the ROC content of ultraviolet-cured inks shall be determined using ASTM Method D5403-93(2007) (EPA Approved 1993), Standard Test Methods for Density of Liquid Coatings, Inks, and Related Products. This method determines the ROC weight percent of inks designed to be cured by ultraviolet light. Calculation of the ROC content in grams per liter requires knowing the ink density. The density of inks shall be determined using ASTM D1475-98, Standard Test Method for Density of Paint, Varnish, Lacquer and Related Products (EPA Approved 1990). (Rule 74.19.E.3)

d. The ROC content of any cyanoacrylate adhesive shall be determined using SCAQMD Test Method 316B Revised August 1997: "Determination of Volatile Organic Compounds (VOC) in Adhesives Containing Cyanoacrylates (EPA Approved August 1997. (Rule 74.19.E.6)

e. The alcohol content of any fountain solution shall be determined using SCAQMD Test Method 313-91, Revised February 1997, "Determination of Volatile Organic Compounds (VOC) by Gas Chromatography/Mass Spectrometry (GC/MS) (EPA Approved June 1993). (Rule 74.19.E.7)

f. When more than one test method or set of test methods are specified for any testing, noncompliance with any requirement of this rule established by any one of the specified test methods or set of test methods shall constitute a violation of Rule 74.19. (Rule 74.19.E.8)

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Ventura County Air Pollution Control District
Rule 74.34.C.2.a - Applicable Requirements
NOx Reductions From Miscellaneous Sources
Units Exempt From Emission Limits

Rule 74.34, "NOx Reductions From Miscellaneous Sources"
Adopted 12/13/16, Federally-Enforceable

Applicability:

This attachment applies to furnaces with a total rated heat input of 5 million BTU per hour or greater. Specifically, this attachment applies to Yankee Hood furnaces or Hot Air furnaces operated at a sanitary paper products manufacturing facility (SIC Code 2676). Pursuant to Subsection C.2, such units, are exempt from the NOx and CO emission limits of Subsection B.1.

A "Yankee Hood Furnace" is a high-speed hot air drying apparatus that works with high-speed sanitary paper machines or specialty paper machines. The drying capacity is four to 10 times higher than conventional dryers because it combines contact drying and convention drying together. A "Hot Air Furnace" is any hot gas generating combustion equipment suitable for direct drying of paper products or other direct drying processes.

Conditions:

1. Pursuant to Rule 74.34.B.6, any owner or operator of an applicable combustion unit shall perform combustion system maintenance in accordance with the manufacturer's schedule and specifications as identified in the manual and other written materials supplied by the manufacturer or distributor, or according to good engineering practices focused on reliability and emission controls.

2. Pursuant to Rule 74.34.B.6, the combustion system maintenance activities shall be documented in a site-specific combustion and emission control systems maintenance plan. The plan shall be available onsite and upon request by APCD personnel.

3. Pursuant to Rule 74.34.D.2, the permittee shall maintain records of combustion system maintenance including, but not limited to, written maintenance schedule, log and description of maintenance activities. These records shall be made available to APCD personnel upon request.

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Ventura County Air Pollution Control District
Rule 103 Applicable Requirements
Stack Monitoring
Boilers, Steam Generators, and Process Heaters
Heat Input Capacity Between 40 MMBTU/Hr and 250 MMBTU/Hr
Capacity Factor of Less Than 30 Percent Per Year

Rule 103, "Continuous Monitoring Systems"
Adopted 02/09/99, Federally-Enforceable

Applicability:

This attachment applies to any boiler, steam generator, or process heater with a heat input capacity between 40 million BTUs per hour and 250 million BTUs per hour, and a capacity factor of less than 30 percent per year. A capacity factor is the ratio of a unit's reported fuel consumption compared to the amount of fuel that would have been used by an applicable unit if it had operated at its rated heat input capacity for the entire year.

Conditions:

1. Pursuant to Rule 103.A.2, the applicable emission unit shall be operated at a capacity factor of less than 30 percent per year to be exempt from the requirements of Rule 103.A.2.

2. Pursuant to Rule 103.A.4, the owner or operator of the applicable emission unit which emits at least 5 pounds per hour, or at least 40 pounds per day of any single air contaminant is not required to install, maintain, and operate continuous monitoring systems unless the Air Pollution Control District requests in writing that such monitoring systems be in operation, and that the air contaminant emissions to be monitored be specified along with a specified reason.

3. In order to demonstrate compliance with Rule 103, the permittee shall maintain monthly records of fuel consumption at the applicable unit and on an annual basis shall calculate the yearly capacity factor. The annual capacity factor calculation shall be submitted with the annual compliance certification to verify that the applicable emission unit is currently operating at a capacity factor of less than 30 percent per year.

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Ventura County Air Pollution Control District
Procter & Gamble Paper Products Company
GE LM-6000 Gas Turbine Based Cogeneration Unit
NO_x, ROC, PM, CO, 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 74.23, "Stationary Gas Turbines"
Adopted 01/08/02, Federally Enforceable

Rule 103, "Stack Monitoring"
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 GG, "Standards of Performance for Stationary Gas Turbines"
Federally Enforceable

Applicability:

This attachment applies to the nitrogen oxides (NO_x measured as NO_2), reactive organic compound (ROC), particulate matter (PM), carbon monoxide (CO), and ammonia (NH_3) emissions at the gas turbine based cogeneration unit, consisting of a GE LM-6000 gas turbine, located at Procter & Gamble Paper Products Company, Oxnard. This attachment describes and streamlines the most stringent requirements of Rule 26, "New Source Review" (BACT), Rule 74.23, "Stationary Gas Turbines"; Rule 103, "Stack Monitoring"; and 40 CFR Part 60, Subpart GG, "Standards of Performance for Stationary Gas Turbines" (NSPS). The Ventura County APCD has been delegated authority for 40 CFR Part 60 Subpart GG and is considered to be the Administrator.

As shown on the attached table, the BACT emission limit of 2.5 ppmvd is more stringent in comparison to the NSPS and the Rule 74.23 NOx limits; therefore the NSPS and Rule 74.23 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. Compliance with the terms and conditions of the streamlined NO_x and NH_3 requirements for the cogeneration unit assures compliance with all individual NO_x, and NH_3 applicable requirements pertaining to the cogeneration unit which have been addressed in the streamline analysis. The attached table details the determination of this permit shield for the cogeneration unit which consists of an LM 6000 natural gas-fired turbine that drives a 46.77 MW electrical generator.

Conditions:

1. The stack outlet concentration of Nitrogen Oxides (NO_x expressed as NO_2) shall not exceed 2.5 ppmvd, referenced at fifteen (15) percent volume stack gas oxygen on a dry basis, and averaged over any three consecutive hours. This emission concentration limit is applied as BACT (Best Available Control Technology) pursuant to Authority to Construct No. 00015-290 (January 21, 2004) and is more stringent than the NOx emission limits of Rule 74.23, "Stationary Gas Turbines" and 40 CFR Part 60 Subpart GG, "Standards of Performance for Stationary Gas Turbines". In order to comply with this condition, the permittee shall operate a selective catalytic reduction (SCR) system to control the emissions of Nitrogen Oxides from the Gas Turbine. Compliance with this condition shall be verified by an annual source test, as specified in Condition No. 5 of this attachment, and by maintaining the continuous emission monitoring and control system operating parameter monitoring, as specified in Condition No. 7 of this attachment.

2. The stack outlet concentration of Reactive Organic Compounds (ROC expressed as CH_4) shall not exceed 2.0 ppmvd, referenced at fifteen (15) percent volume stack gas oxygen on a dry basis, and averaged over any three consecutive hours.

   This emission concentration limit is applied as BACT (Best Available Control Technology) pursuant to Authority to Construct No. 00015-290 (January 21, 2004). In order to comply with this condition, the permittee shall operate an oxidation catalyst to control the emissions of Reactive Organic Compounds from the Gas Turbine. Compliance with this emission concentration limit shall be verified by annual source testing, as specified in Condition No. 5.

3. The NO_x and ROC emission limits listed above shall not apply to the gas turbine during the thermal stabilization period associated with a start-up, planned shutdown, or unplanned load change. A cold start-up exemption shall not exceed twelve (12) hours; a normal start-up exemption shall not exceed three (3) hours; a planned shutdown exemption shall not exceed one (1) hour; and an unplanned load change exemption shall not exceed two (2) hours. For failed start-ups, each restart shall begin a new exemption period. The NO_x exemption has been applied pursuant to Rule 74.23.C.2.

4. Pursuant to Rule 74.23.B.4, the stack outlet concentration of ammonia (NH_3) shall not exceed 20 ppmvd, referenced at fifteen (15) percent volume stack gas oxygen on a dry basis. Compliance with this condition shall be verified by an annual source test, as specified in Condition No. 5 of this attachment.

5. Pursuant to Rule 74.23.B.1, the cogeneration unit shall be source tested not less than once every 12 months (annually) utilizing the following methods:

a.	NO_x	EPA Method 20
b.	CO	ARB Method 100
c.	ROC	EPA Method 25 or EPA Method 18
d.	Oxygen content	ARB Method 100
e.	Gaseous fuel heating value	ASTM Method D 1826-88
f.	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 and a source test protocol, subject to District approval, 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 steam injection rate, the steam to fuel ratio, the ammonia injection rate, and the ammonia to NO_x mole ratio entering the SCR unit. The test report shall also include data to show that the continuous emissions monitors and recorders accurately estimate emissions and concentration limits. The test report and results shall be submitted to the APCD Compliance Division within 45 days after the test.

6. The stack outlet concentration of Particulate Matter shall not exceed 3.08 pounds per million cubic feet (MMCF) of gas burned.

   This emission concentration limit is applied in order to comply with the emission offset requirements of Rule 26.2, "New Source Review – Requirements", pursuant to Authority to Construct No. 00015-290 (January 21, 2004). Prior emissions source testing required by Authority to Construct No. 00015-290 has demonstrated compliance with this limit. In order to demonstrate ongoing compliance with this condition, the permittee shall conduct a source test using ARB Method 5 upon request of the District Compliance Division.

7. Pursuant to Rule 74.23.B.2 and Rule 103.A.4, the permittee shall provide, properly install, maintain in good working order, operate, and calibrate, in accordance with manufacturers specifications, continuous monitoring systems at the gas turbine based

cogeneration unit to continuously monitor, calculate where appropriate, and record the following data and control system operating parameters:

a. The fuel consumption rate for the gas turbine;
b. Monthly fuel consumption;
c. The exhaust concentration of NO_x and CO, in ppmvd, and in ppmvd corrected to 15% oxygen;
d. The previous three hour average, excluding the first two hours from a cold start, of the exhaust concentration of NO_x in ppmvd, corrected to 15% oxygen;
e. Stack gas oxygen concentration in percent;
f. The exhaust flow rate in standard dry cubic feet per minute;
g. The ratio of the amount of steam injected into the gas turbine's combustor to the amount of fuel consumed by the gas turbine;
h. The ammonia to NO_x mole ratio entering the SCR reactor;
i. The temperature at the SCR reactor;
j. The NO_x emissions in tons summed for the previous 12 calendar months;
k. The CO emissions in tons summed for the previous 12 calendar months; and
l. The elapsed time of operation.

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

8. Pursuant to Rule 103.C.4, the continuous emission monitoring system shall be installed, calibrated, and maintained in accordance with the specifications in 40 CFR, Part 51, Appendix P, Sections 3.0 through 3.9.5. As stated in 40 CFR, Part 51, Appendix P, Section 3.1; the continuous monitoring systems shall comply with the following Performance Specifications:

a. Continuous monitoring systems for measuring nitrogen oxides shall comply with 40 CFR, Part 60, Appendix B, Performance Specification 2.
b. Continuous monitoring systems for measuring carbon monoxide shall comply with 40 CFR, Part 60, Appendix B, Performance Specification 4A.
c. Continuous monitoring systems for measuring oxygen shall comply with 40 CFR, Part 60, Appendix B, Performance Specification 3.

As an alternative, the continuous emission monitoring system shall be installed, calibrated, and maintained in accordance with other specifications established by the District.

9. Pursuant to Rule 103.B.1, the permittee shall report any violation of any applicable monitored emission standard in writing to the District within 96 hours of each occurrence. Upon receipt, the District shall transmit the violation report to the state within five working days.

10. Pursuant to Rule 103.B.2, the permittee shall maintain permanent continuous 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.
    d. Any applicable emission limit, if based on calculations.

11. Pursuant to Rule 103.B.4, the permittee shall, upon written request of the Air Pollution Control Officer, provide a summary of the data obtained from the continuous monitoring systems. The format of the summary shall be approved in writing by the Air Pollution Control Officer.

12. Pursuant to Rule 103.B.5(c), continuous emission monitoring data shall be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods determined to be equivalent by the District, the Air Resources Board, and the Environmental Protection Agency.

13. Permittee shall maintain records of all maintenance operations, periodic inspections, and repairs performed on the turbine, air pollution control system, and continuous emissions monitors. Permittee shall also maintain records and copies of all source test reports and any violations or exceedances of the limits shown in the conditions of this Permit to Operate. These records shall be made available for inspection by the District upon request.

14. 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.

NO_x Streamlining Comparison
LM-6000 Gas Turbine Based Cogeneration Unit, Part 70 Permit No. 00015
(Most Stringent Requirements Shaded)

	Rule 26 (BACT)	RULE 74.23 AND RULE 103	NSPS SUBPART GG
WORK PRACTICE STDS.	None	None	None
EMISSION LIMIT	AC No. 00015-290 BACT **2.5 ppmvd @ 15% O_2**	Rule 74.23.B.6 **6.8 ppmvd @ 15% O_2**	60.332(a)(1) STD = 0.0075 x (14.4)/Y + F STD is allowable % NO_x by vol @ 15% O_2 with no allowances for unit efficiency (Y) or fuel bound nitrogen (F): STD = 0.0075%vol = **75 ppmvd @ 15% O_2**
MONITORING	Default to Rule 74.23 and Rule 103 requirements	Rule 74.23 Source test annually for NO_x and O_2 content (74.23.B.1); Monitor NO_x directly w/CEM (74.23.B.2.c); Monitor control system operating parameters and elapsed time of operation (74.23.B.2) Rule 103 Monitor NO_x directly w/CEM (103.A.4); CEM, maintained per 40 CFR, Part 51, Appendix P, 3.0-3.9.5 & Part 60 Appendix B, Performance Spec 2 (103.C.4)	60.334 Continuously monitor fuel consumption and ratio of water (steam) to fuel (system accurate to ±5.0%) (60.334(a)); Monitor nitrogen content of fuel daily or as approved by Administrator (District is Administrator; and does not give a fuel bound nitrogen allowance in limit) (60.334(b))

NO_x Streamlining Comparison (Continued)
LM-6000 Gas Turbine Based Cogeneration Unit, Part 70 Permit No. 00015
(Most Stringent Requirements Shaded)

	Rule 26 (BACT)	RULE 74.23 AND RULE 103	NSPS SUBPART GG
RECORDKEEPING	Rule 74.23 and Rule 103 requirements	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 51 Appendix P, 5.0-5.3.3 (103.B.5(c))	60.334(a) Continuous records of the water (or steam) to fuel ratio 60.7 Record startups, shutdowns, and malfunctions of unit and control device (60.7(b)) Maintain file of all measurements, etc. (60.7(f))
REPORTING	Rule 74.23 and Rule 103 requirements	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 Air Pollution Control Officer (103.B.4)	60.334(c)(1) Report exceedances of the water (steam) to fuel ratio which has been determined to demonstrate compliance with the NO_x limit Report exceedances of the fuel bound nitrogen content allowed by the fuel-bound nitrogen allowance used during the performance test
TEST METHODS	Rule 74.23 and Rule 103 requirements	74.23.F NOx – EPA Method 20 O_2 content – ARB Method 100 Gaseous fuel HHV – ASTM Method D 1826-88 NH_3 – BAAQMD Method ST-1B, 01/20/82	60.335(c)(3) NOx – EPA Method 20 O_2 Content – EPA Method 20 60.335(a) nitrogen content of fuel – a method approved by the administrator (District) that is accurate to within 5%

Ventura County Air Pollution Control District
Procter & Gamble Paper Products Company
GE LM-2500 Gas Turbine Based Cogeneration Unit
NO_x and CO Applicable Requirements
Including Streamlined NO_x Requirements

Rule 74.23, "Stationary Gas Turbines"
Adopted 01/08/02, Federally-Enforceable

Rule 103, "Stack Monitoring"
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 GG, "Standards of Performance for Stationary Gas Turbines"
Federally Enforceable

EPA Prevention of Significant Deterioration (PSD) Permit, NSR 4-4-9, LA 79-08
Issued 4/2/80 and Revision Issued 10/28/94, Federally Enforceable

Applicability:

This attachment applies to the nitrogen oxides (NO_x measured as NO_2) and carbon monoxide (CO) emissions at the gas turbine based cogeneration unit, consisting of a GE LM-2500 gas turbine equipped with water injection, located at Procter & Gamble Paper Products Company, Oxnard. This attachment describes and streamlines the most stringent requirements of Rule 74.23, "Stationary Gas Turbines"; Rule 103, "Stack Monitoring"; 40 CFR Part 60, Subpart GG, "Standards of Performance for Stationary Gas Turbines" (NSPS); and the April 2, 1980 PSD Permit (NSR 4-4-9, LA 79-08). The Ventura County APCD has been delegated authority for 40 CFR Part 60 Subpart GG and is considered to be the Administrator.

As shown on the attached table, the Rule 74.23 and Rule 103 NO_x emission limit, monitoring, recordkeeping, reporting, and test method requirements are the most stringent in comparison to the NSPS and PSD Permit requirements; therefore the NSPS and PSD Permit requirements are subsumed by the requirements of Rule 74.23 and Rule 103.

Compliance with the terms and conditions of the streamlined NO_x and CO requirements for the cogeneration unit assures compliance with all individual NO_x and CO applicable requirements pertaining to the cogeneration unit which have been addressed in the streamline analysis. The attached table details the determination of this permit shield for the cogeneration unit which consists of an LM-2500 natural gas-fired turbine that drives a 22.7 MW electrical generator.

Conditions:

1. The stack outlet concentration of Nitrogen Oxides (NO_x expressed as NO_2) shall not exceed 24 ppmvd while burning natural gas. This limit is referenced at fifteen (15) percent volume stack gas oxygen on a dry basis, and averaged over any three consecutive hours. This limit is applied for Rule 74.23.B.1 and Rule 74.23.B.5 compliance.

   This emission limit is more stringent than the NO_x emission limit of 40 CFR Part 60 Subpart GG and the April 2, 1980 PSD Permit (NSR 4-4-9, LA 79-08). Compliance with this condition shall be verified by an annual source test, as specified in Condition No. 3 of this attachment, and by maintaining the continuous emission monitoring and control system operating parameter monitoring, as specified in Condition No. 4 of this attachment.

2. Pursuant to Rule 74.23.C.1.e, the NO_x emission limit stated above shall not apply to the cogeneration unit during the thermal stabilization period associated with a start-up, planned shutdown, or unplanned load change. These exemption periods shall not exceed one (1) hour. For failed start-ups, each restart shall begin a new exemption period.

3. Pursuant to Rule 74.23.B.1, the cogeneration unit shall be source tested annually utilizing the following methods:

a.	NO_x	EPA Method 20
b.	Oxygen content	ARB Method 100
c.	CO	ARB Method 100
d.	Gaseous fuel heating value	ASTM Method D 1826-88

   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 and a source test protocol, subject to District approval, 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 and CO 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 in pounds per hour and the water to fuel ratio. 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.

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

   a. The fuel consumption rate for the gas turbine;
   b. Monthly fuel consumption;
   c. The exhaust concentration of NO_x and CO, in ppmvd, and in ppmvd corrected to 15% oxygen;
   d. The previous three hour average, excluding the first hour from a cold start, of the exhaust concentration of NO_x in ppmvd, corrected to 15% oxygen;
   e. Stack gas oxygen concentration in percent;
   f. The exhaust flow rate in standard dry cubic feet per minute;
   g. The water injected to fuel fired ratio, accurate to $\pm$5%;
   h. The NO_x emissions in tons summed for the previous 12 calendar months;
   i. The CO emissions in tons summed for the previous 12 calendar months; and
   j. The elapsed time of operation.

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

5. Pursuant to Rule 103.C.4, the continuous emission monitoring system shall be installed, calibrated, and maintained in accordance with the specifications in 40 CFR, Part 51, Appendix P, Sections 3.0 through 3.9.5. As stated in 40 CFR, Part 51, Appendix P, Section 3.1; the continuous monitoring systems shall comply with the following Performance Specifications:

   a. Continuous monitoring systems for measuring nitrogen oxides shall comply with 40 CFR, Part 60, Appendix B, Performance Specification 2.
   b. Continuous monitoring systems for measuring carbon monoxide shall comply with 40 CFR, Part 60, Appendix B, Performance Specification 4.
   c. Continuous monitoring systems for measuring oxygen shall comply with 40 CFR, Part 60, Appendix B, Performance Specification 3.

   As an alternative, the continuous emission monitoring system shall be installed, calibrated, and maintained in accordance with other specifications established by the District.

6. Pursuant to Rule 103.B.1, the permittee shall report any violation of any emission standard with which the cogeneration unit is required to comply, as indicated by the records of the monitoring device. The report shall be in writing to the District Compliance Division within 96 hours after such 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.

7. 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.
   d. Any applicable limit, if based on calculations.

8. Pursuant to Rule 103.B.4, the permittee shall, upon written notice from the Air Pollution Control Officer, provide a summary of the data obtained from the continuous monitoring systems. The format of the summary shall be approved in writing by the Air Pollution Control Officer.

9. Pursuant to Rule 103.B.5(c), continuous emission monitoring data shall be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods determined to be equivalent by the District, the Air Resources Board, and the Environmental Protection Agency.

10. Permittee shall maintain records of all maintenance operations, periodic inspections, and repairs performed on the turbine, air pollution control system, and continuous emissions monitors. Permittee shall also maintain records and copies of all source test reports and any violations or exceedances of the limits shown in the conditions of this Permit to Operate. These records shall be made available for inspection by the District upon request.

11. 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.

NO_x Streamlining Comparison
LM-2500 Gas Turbine Based Cogeneration Unit , PO No. 00015
(Most Stringent Requirements Shaded)

	RULE 74.23 AND RULE 103	NSPS SUBPART GG	PSD PERMIT
WORK PRACTICE STANDARDS	None	None	None
EMISSION LIMIT	Rule 74.23.B.5 Natural Gas: **24 ppmvd@ 15% O_2** Equivalent emission factor: **0.088 lb NO_x/MMBTU**	60.332(a)(1) STD = 0.015 x (14.4)/Y + F STD is allowable % NO_x by vol @ 15% O_2 with no allowances for unit efficiency (Y) or fuel bound nitrogen (F): STD = 0.015%vol = **150 ppmvd @ 15% O_2** Equivalent emission factor: **0.55 lb NO_x/MMBTU**	PSD Condition VII.D Natural Gas: **0.2165 lb NO_x/MMBTU**
MONITORING	Rule 74.23 Source test annually for NO_x and O_2 content (74.23.B.1); Monitor NO_x directly w/CEM (74.23.B.2.c); Monitor control system operating parameters and elapsed time of operation (74.23.B.2) Rule 103 Monitor NO_x directly w/CEM (103.A.4); CEM, maintained per 40 CFR, Part 51, Appendix P, 3.0-3.9.5 & Part 60 Appendix B, Performance Spec 2 (103.C.4)	60.334 Continuously monitor fuel consumption and ratio of water (steam) to fuel (system accurate to ?5.0%) (60.334(a)); Monitor nitrogen content of fuel daily or as approved by Administrator (District is Administrator; and does not give a fuel bound nitrogen allowance in limit) (60.334(b))	PSD Permit Source test annually; Monitor water to fuel ratio or monitor NO_x emissions (CEM); CEM maintained per 40 CFR

NO_x Streamlining Comparison (Continued)
LM-2500 Gas Turbine Based Cogeneration Unit, PO No. 00015
(Most Stringent Requirements Shaded)

	RULE 74.23 AND RULE 103	NSPS SUBPART GG	PSD PERMIT
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 51 Appendix P, 5.0-5.3.3 (103.B.5(c))	60.334(a) Continuous records of the water (or steam) to fuel ratio 60.7 Record startups, shutdowns, and malfunctions of unit and control device (60.7(b)) Maintain file of all measurements, etc. (60.7(f))	PSD Permit Identical to NSPS Subpart GG
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)	NOx (60.334(c)(1)) Report exceedances of the water (steam) to fuel ratio which has been determined to demonstrate compliance with the NO_x limit Report exceedances of the fuel bound nitrogen content allowed by the fuel-bound nitrogen allowance used during the performance test	PSD Permit Report excess emissions to EPA by telephone within 48 hours, and to EPA in writing within 15 days, of each occurrence
TEST METHODS	74.23.F NO_x - EPA Method 20 O_2 content - ARB Method 100 Gaseous fuel HHV - ASTM Method D 1826-88	60.335(c)(3) NO_x - EPA Method 20 O_2 Content - EPA Method 20 60.335(a) nitrogen content of fuel - a method approved by the Administrator (District) that is accurate to within 5 %	PSD Permit NO_x - EPA Method 20 O_2 Content - EPA Method 20

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Ventura County Air Pollution Control District
Procter & Gamble Paper Products Company
LM-6000 and LM-2500 Gas Turbine Based Cogeneration Units
SO_x Applicable Requirements - Streamlined

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

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

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

EPA Prevention of Significant Deterioration (PSD) Permit, NSR 4-4-9, LA 79-08
Issued 4/2/80 and Revision Issued 10/28/94, Federally-Enforceable

Applicability:

This attachment applies to the sulfur oxides (SOx measured as SO2) emissions at the GE LM-6000 and GE LM-2500 gas turbine based cogeneration units located at Procter & Gamble Paper Products Company, Oxnard. This attachment describes and streamlines the most stringent sulfur content of fuel and SO_x emissions at the point of discharge requirements of Rule 54, "Sulfur Compounds," Rule 64, "Sulfur Content of Fuels," 40 CFR Part 60, Subpart GG, "Standards of Performance for Stationary Gas Turbines" (NSPS), and the LM-2500 PSD Permit NSR 4-4-9, LA 79-08. The Ventura County APCD has been delegated authority for 40 CFR Part 60 Subpart GG and is considered to be the Administrator.

As detailed in the attached tables, the Rule 64 fuel sulfur content limits for PUC natural gas are the most stringent in comparison to the Rule 54, NSPS Subpart GG, and the LM-2500 PSD Permit SO_x emission limits and sulfur content limits. Rule 64, NSPS Subpart GG, and the LM-2500 PSD Permit require monitoring of the fuel sulfur content at the discretion of the District. Therefore, the Rule 54, the NSPS Subpart GG, and the LM-2500 PSD Permit SO_x emission limits, monitoring, recordkeeping, reporting, and test methods requirements are subsumed by Rule 64.

Compliance with the terms and conditions of the streamlined SO_x requirements for the cogeneration unit assures compliance with all individual SO_x applicable requirements pertaining to the cogeneration unit which have been addressed in the streamline analysis. The attached tables detail the determination of this permit shield for the GE LM-6000 and GE LM-2500 gas turbine based cogeneration units.

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. Pursuant to Rule 54, no person shall discharge sulfur compounds, which would exist as a liquid or gas at standard conditions, in excess of 300 ppm by volume, on a dry basis, calculated as sulfur dioxide (SO_2) at 15% oxygen, at the point of discharge from a stationary gas turbine.

   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.

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 307-941 (Determination of Sulfur in a Gaseous Matrix), as appropriate.

SO_x Streamlining Comparison
Gas Turbine Based Cogeneration Units, PO No. 00015
(Most Stringent Requirements Shaded)

	RULE 54	RULE 64	NSPS SUBPART GG
WORK PRACTICE STANDARDS	None	None	None
EMISSION LIMIT	Rule 54.B.1 ≤ 300 ppmv calculated as SO_2 at 15% O_2 (Equivalent EF = 1612.8 lb SO_x/mmcf)	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)**	60.333(a) ≤ 0.015% vol @ 15% O2 on a dry basis (0.015% vol = 150ppmv) **(Equivalent EF = 806.4 lb SO_x/mmcf)** OR Rule 60.333(b) Sulfur content of fuel ≤ 0.8 wt% **(Equivalent EF = 661.5 lb SO_x/mmcf)**
MONITORING	PUC-quality natural gas - None Non-PUC quality natural gas - Annual analysis of fuel sulfur content	PUC-quality natural gas - None Non-PUC quality natural gas - Annual analysis of fuel sulfur content	60.334(b) PUC-quality natural gas - None, as approved by the District (Administrator) Non-PUC quality natural gas - Monitor sulfur content of fuel annually, as approved by the District (Administrator)

SO_x Streamlining Comparison (Continued)
Gas Turbine Based Cogeneration Unit, PO No. 00015
(Most Stringent Requirements Shaded)

	RULE 54	RULE 64	NSPS SUBPART GG
RECORDKEEPING	PUC-quality natural gas – None Non-PUC quality natural gas - Maintain records of annual fuel analyses	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)
REPORTING	Provide fuel records to the District upon request	Provide fuel records to the District upon request	60.334(c)(2) Provide fuel records to the District upon request, as approved by the District (Administrator)
TEST METHODS	Rule 54.D.1 SO_x - EPA Methods 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD Method 307-941	Rule 64.D Sulfur content of gaseous fuels - SCAQMD Method 307-94	60.335(c)(3) SO_x - EPA Method 20 O_2 Content - EPA Method 20 60.335(d) Sulfur content of gaseous fuels - ASTM D 1072-80, D 3031-81, D 4084-82, or D 3246-81

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Ventura County Air Pollution Control District
National Emission Standards for Hazardous Air Pollutants
40 CFR Part 63 Subpart KK Applicable Requirements
National Emission Standards for the Printing and Publishing Industry

40 CFR Part 63, "National Emission Standards for Hazardous Air Pollutants for Source Categories"
40 CFR Part 63, Subpart A, "General Provisions"
40 CFR Part 63, Subpart KK, "National Emission Standards for the Printing and Publishing Industry"
Federally-Enforceable

Applicability:

This attachment describes the requirements of 40 CFR Part 63 Subpart KK, "National Emission Standards for the Printing and Publishing Industry", and 40 CFR Part 63 Subpart A, "General Provisions", and applies to an existing facility at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated. Specifically, this attachment applies to a facility for which the owner or operator chooses to, commits to, and meets the criteria for purposes of establishing the facility to be an area source of hazardous air pollutants (HAP), as defined in 40 CFR Part 63.2. An area source is not a major source of HAP.

This attachment details the monitoring, recordkeeping, and reporting requirements of 40 CFR Part 63, Subpart KK and 40 CFR Part 63, Subpart A necessary to demonstrate that the facility is not a major source of HAP.

Conditions:

1. The facility shall use less than 9.1 Mg (10 tons) per each rolling 12-month period of each HAP at the facility, including materials used for source categories or purposes other than printing or publishing. (63.820(a)(2)(i))

2. The facility shall use less than 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing or publishing. (63.820(a)(2)(ii))

3. The emission limits listed above may exclude material used in routine janitorial or facility grounds maintenance, personal uses by employees or other persons, the use of products for the purpose of maintaining electric, propane, gasoline and diesel powered motor vehicles operated by the facility, and the use of HAP contained in intake water, used for processing or noncontact cooling, or intake air, used either as compressed air or for combustion. (63.820(a)(4))

4. By complying with the above emissions limits, this facility shall be considered an area source and is subject only to the provisions of 40 CFR Part 63.829(d) and 40 CFR Part 63.830(b)(1) of 40 CFR Part 63 Subpart KK. (63.820(a)(3))

5. In order to meet the criteria of 40 CFR Part 63.820(a)(2), the facility shall maintain records of all required measurements and calculations needed to demonstrate compliance with these criteria, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis. (63.829(d))

6. The facility shall submit, to the District and EPA Region IX, an initial notification required in 40 CFR Part 63.9(b). (63.830(b)(1))

   This initial notification shall be submitted no later than one year before the compliance date specified in 40 CFR Part 63.826(a). This notification date is May 30, 1998 which is one year before the compliance date of May 30, 1999. (63.830(b)(1)(i))

   For the purpose of 40 CFR Part 63, Subpart KK, the title V part 70 permit application for this facility was used in lieu of the initial notification. (63.830(b)(1)(iii))

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

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

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

Applicability:

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

Conditions:

1. Pursuant to subsection 93115.5(a), as of January 1, 2006, the permittee shall not fuel the engine with any fuel unless the fuel is one of the following:

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

f. any combination of the above.

2. Pursuant to subsection 93115.10(f)(1)(E), the permittee shall keep a monthly log of each engine's hours of operation to comply with the requirements of NFPA 25.

3. Pursuant to subsection 93115.5(f)(1)(H), the permittee shall document fuel use in the engines. For engines operated exclusively on CARB Diesel Fuel, the owner or operator shall document the use of CARB Diesel Fuel through the retention of fuel purchase records indicating that the only fuel purchased for supply to an emergency standby engine was CARB Diesel Fuel; or for engines operated on any fuel other than CARB Diesel Fuel, the fuel records demonstrating that the only fuel purchased and added to an emergency standby engine or engines, or to any fuel tank directly attached to an emergency standby engine or engines, meets the requirements of section 93115.5(b).

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

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

Applicability:

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

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

Conditions:

1. Pursuant to Section 63.6603(a), Table 2d, the permittee shall comply with the following operating requirements:

    a. Change oil and filter every 500 hours of operation or annually, whichever comes first. An oil analysis program as described in Section 63.6625(i) can be utilized in order to extend the specified oil change requirement.

    b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary.

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

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

2. Pursuant to Section 63.6625(e) and 63.6640(a), Table 6, the permittee shall operate and maintain the stationary RICE according to the manufacturer's emission-related written instructions or develop your own plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

3. Pursuant to Section 63.6625(f), the RICE shall be equipped with a non-resettable hour meter.

4. Pursuant to Section 63.6625(h), the permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

5. Pursuant to Sections 63.6640(f) and 63.6675, the permittee shall operate the emergency RICE in compliance with the following requirements:

   a. There is no time limit on the use of emergency stationary RICE in emergency situations. An emergency can be the loss of grid power or the stationary source's own power production.

   b. The use of the engine is limited to 100 hours per calendar year for maintenance checks and readiness testing, emergency demand response, 5% or greater voltage or frequency deviation situations, and up to 50 hours per year for non-emergency situations as detailed in Section 63.6640(f)(4). The 50 hours are to be counted in the 100 hours limit.

   c. The emergency stationary RICE may be operated up to 50 hours per calendar year for peak shaving as part of a financial agreement to supply power into the grid, or as part of a non-emergency demand response program, until May 3, 2014. After May 3, 2014, the 50 hours per year for non-emergency situations can be used to supply power as part of a financial agreement if all of the requirements of Section 63.6640(f)(4)(ii) are met. The 50 hours per year limit is to be counted towards the 100 hours per year limit.

6. Pursuant to Sections 63.6655(e) and 63.6655(f), the permittee shall maintain the following records:

   a. Records of maintenance conducted on the stationary emergency RICE.

   b. Records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency, and how many hours are spent for non-emergency operation.

7. If the engine is contractually obligated to be available for more than 15 hours per year for emergency demand response, 5% or greater voltage or frequency deviation situations, or for non-emergency situations as detailed in Section 63.6640(f)(4)(ii) the engine must use a diesel fuel that meets the requirements in 40 CFR 80.510(b) for non-road diesel fuel. This fuel is commonly known as ultra low sulfur diesel or ULSD. Any diesel fuel purchased (or otherwise obtained) prior to January 1, 2015 may be used until depleted. (Section 63.6604(b))

8. If the engine is contractually obligated to be available for more than 15 hours per year for emergency demand response, 5% or greater voltage or frequency deviation situations, or for non-emergency situations as detailed in Section 63.6640(f)(4)(ii) the permittee is required to compile and submit a report as required by Section 63.6650(h). This report includes, but is not limited to, location information, engine information, hours of operation, and fuel requirement deviations. The first annual report must cover calendar year 2015 and must be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year. As required by Section 63.6650(h)(3), the annual report must be submitted electronically via EPA's Central Data Exchange (CDX). (Section 63.6650(h))

9. On an annual basis, the permittee shall certify that all engines at this stationary source are operating in compliance with 40 CFR Part 63, Subpart ZZZZ, "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Engines" (RICE MACT).

7. PERMIT SPECIFIC CONDITIONS (ATTACHMENTS)

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

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

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Ventura County Air Pollution Control District
Additional Permit Requirements
Procter & Gamble Paper Products Company

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 Procter & Gamble Paper Products Company Oxnard facility. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. In order to comply with the throughput and consumption limits of this permit, the permittee shall maintain monthly records of throughput and consumption as detailed in Section No. 3, "Permitted Throughput and Consumption Limit Table", of this permit. The monthly records shall be summed for the previous 12 months. Throughput or consumption totals for any of these 12 calendar month rolling periods in excess of the specified limit shall be considered a violation of this permit. This is a general throughput and consumption recordkeeping condition and applies unless another throughput and consumption recordkeeping condition appears in this section of the permit. (Rule 26)

2. 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. Pursuant to Rule 23.F.10.d, solvent cleaning where less than 200 pounds each of ROC, methylene chloride, 1,1,1 trichloroethane, and perchloroethylene are lost to the atmosphere during any rolling period of 12 consecutive calendar months is exempt. 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, a reference to the specific permit exemption status, and their ROC content and pounds used per rolling 12 month period, as necessary.

(Rule 29)

3. As an alternative to operating the 100 MMBTU/hr Babcock & Wilcox (B301) boiler, the facility may operate a rental boiler rated less than or equal to 100 MMBTU/hr, as needed, for up to twelve months. While the temporary boiler is in use, the terms and conditions of Section No. 7, Attachment PO00015PC2 shall apply. While the site is operating under this alternative scenario, Section No. 7, Attachment PO00015PC4 shall not apply. The temporary boiler shall be equipped with low NOx burners to meet the emission limitations of the 100 MMBTU/hr Babcock & Wilcox boiler. The permittee shall maintain documentation that the temporary boiler meets the emission limitations of the Babcock & Wilcox boiler. The permittee shall maintain records of the usage of the temporary boiler.

Ventura County Air Pollution Control District
Additional Permit Requirements
Combustion Emissions Units

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 combustion units at the Procter & Gamble Paper Products Company Oxnard facility. The combustion units are the LM-6000 Turbine, LM-2500 Turbine, 100 MMBTU/Hr Babcock & Wilcox Boiler, 1X Paper Machine 150 MMBTU/Hr Hot Air Furnace, 1X Paper Machine 28 MMBTU/Hr "Yankee" Hood Furnace, 2X Paper Machine 70 MMBTU/Hr Hot Air Furnace, and 2X Paper Machine 40 MMBTU/Hr "Yankee" Hood Furnace. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. As stated in Section No. 3 of this permit, "Permitted Throughput and Consumption Limit Table", the combined emissions from the combustion units at the facility **(LM-6000 Turbine, LM-2500 Turbine, Babcock & Wilcox Boiler, 1X Hot Air Furnace, 1X "Yankee" Hood Furnace, 2X Hot Air Furnace, and 2X "Yankee" Hood Furnace)** shall not exceed the following:

Emission Limits

	ROC	NOx	PM	SOx	CO
Tons per Year:	16.82	132.88	21.25	2.03	284.93

In order to comply with this condition, the permittee shall maintain a rolling twelve month total of ROC, NOx, PM, SOx, and CO emissions for the above units. The permittee shall record the monthly natural gas consumption at each of the above units and shall maintain a rolling twelve month record of NOx and CO emissions from the LM-6000 and LM-2500 turbines as recorded by the continuous emissions monitoring systems (CEMs). The monthly natural gas consumption records shall be used with the following emission factors to calculate monthly emissions (where no emission factor is given the CEMs data is used):

Emission Factors

	ROC	NOx	PM	SOx	CO	Units
LM 6000 Turbine	2.69	CEM	3.08	0.60	CEM	Lb/MMcf
LM 2500 Turbine	8.75	CEM	10.91	0.60	CEM	Lb/MMcf
B & W Boiler	5.50	50.90	7.60	0.60	310.00	Lb/MMcf
1X Hot Air Furnace	5.50	220.00	7.60	0.60	84.00	Lb/MMcf
1X Yankee Hood	5.50	100.00	7.60	0.60	84.00	Lb/MMcf
2X Furnaces	5.50	84.00	10.50	0.60	47.20	Lb/MMcf

The emission factors may be changed at the discretion of the VCAPCD. If the factors are revised, the emission limits listed above will be changed accordingly. Monthly emissions for all the combustion units listed above shall be summed for the previous twelve months. Emission totals for any of these 12 calendar month periods in excess of the specified limits shall be considered a violation of this condition.

The emission limits are based on the emission factors listed above, the turbine NOx and CO emission factors listed below, and the annual fuel throughputs listed below.

Turbine NOx and CO Emission Factors

	NOx	CO	Units
LM 6000 Turbine	9.66	14.11	Lb/MMcf
LM 2500 Turbine	92.73	240.00	Lb/MMcf

Annual Fuel Throughputs

LM 6000 Turbine:	3,795 MMcf natural gas for ROC, PM, & SOx 3,460.2 MMcf natural gas for NOx & CO
LM 2500 Turbine:	2,228 MMcf natural gas for ROC, PM, & SOx 1,799 MMcf natural gas for NOx 1,865 MMcf natural gas for CO
1X Hot Air Furnace:	24.55 MMcf natural gas for NOx Zero for ROC, PM, SOx, & CO
B & W Boiler:	117.8 MMcf natural gas
1X Yankee Hood:	234 MMcf natural gas
2X Furnaces:	365.7 MMcf natural gas

This emission limit basis was established with Permit to Operate Application No. 0015-211. Revisions were made to this emission limit condition as a result of emission factor changes during the processing of Authority to Construct No. 00015-290 (January 21, 2004). Revisions were made to this condition as a result of removing fuel oil and

propane combustion pursuant to Part 70 Permit Reissuance Application No. 00015-351. The CO emission limit and CO emission factor for the LM 2500 Turbine were revised pursuant to Application No. 00015-381. (Rule 26)

2. All combustion units listed in Condition No. 1 shall be fired on natural gas only. (Rule 26)

3. The permittee shall maintain the following records:

   a. Monthly and twelve month rolling records of fuel consumption at each unit; (Rule 26)

   b. Monthly and twelve month rolling records of ROC, NOx, PM, SOx, and CO emissions (in tons) for all combustion units. The emissions of NOx and CO for the LM-6000 and LM-2500 Turbines shall be measured by the continuous emission monitoring systems. All other annual emission rates shall be calculated by using the monthly natural gas records and the emission factors listed in Condition No. 1. (Rule 26)

4. The CO pounds per hour permitted emissions for the LM 2500 Turbine are 180.13 pounds per hour (See Table No. 4) pursuant to Application No. 00015-381. The application requested a maximum hourly emission factor of 655 pounds CO per MMCF natural gas for the pounds per hour permitted emissions. Compliance with this emission limit shall be demonstrated by the annual source test required by Attachment STRMLN15LM2500-NOx,CO. (Rule 29)

5. The CO pounds per hour permitted emissions for the GE LM-6000 Gas Turbine are 10.20 pounds per hour (See Table No. 4) pursuant to Application No. 00015-431. The application requested a maximum hourly emission factor of 22.67 pounds CO per MMCF natural gas for the pounds per hour permitted emissions. Compliance with this emission limit shall be demonstrated by the annual source test required by Attachment STRMLN15LM6000-NOx. (Rule 29)

6. Alternative Operating Scenario: The facility may operate a boiler rated less than or equal to 100 MMBTU/hr in place of the 100 MMBTU/hr Babcock & Wilcox boiler (B301), as needed, for up to twelve months in duration. All requirements for the Babcock & Wilcox boiler shall be applicable to the temporary boiler, with the exception of Attachment PO00015PC4. The permittee shall maintain documentation that the temporary boiler meets the emission limitations of the Babcock & Wilcox boiler. The permittee shall maintain records of the usage of the temporary boiler.

Ventura County Air Pollution Control District
Additional Permit Requirements
2X Paper Machine Hot Air Furnace and "Yankee" Hood Furnace

Rule 26, "New Source Review"

Conditions applied pursuant to Rule 26 are federally enforceable.

Applicability:

This attachment applies to the 70 MMBTU/Hr Coen Company Hot Air Furnace (2X Paper Machine), and the 40 MMBTU/Hr Coen Company "Yankee" Hood Furnace (2X Paper Machine) located at the Procter & Gamble Paper Products Company Oxnard facility. Emissions from both the Hot Air Furnace and the Yankee Hood Furnace are discharged together through the Hot Air / Predryer Furnace Stack (S-7A) to the atmosphere. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. The 2X Paper Machine (consisting of the 70 MMBTU/Hr Hot Air Furnace and the 40 MMBTU/Hr "Yankee" Hood Furnace) shall comply with the following emission limitations:

   a. The stack outlet concentration of oxides of nitrogen (NO_x measured as NO_2) shall not exceed 0.08 lb/MMBTU.
   b. The stack outlet concentration of carbon monoxide (CO) shall not exceed 0.045 lb/MMBTU.

   These limitations are a BACT (best available control technology) requirement as established in Authority to Construct No. 0015-110. (Rule 26)

2. In order to meet these emission limitations, the fuel and air settings on each of the two (2) 2X Paper Machine furnaces shall remain locked in the following position:

   70 MMBTU/Hr Hot Air Furnace:

Foxboro % Open	Windbox % Open	Gas Valve Screw Number	Jackshaft % Open x 100
100	100	1.5 +/- 0.5	10.0
75	75	3.5 +/- 0.5	8.0 +/- 0.5
50	50	5.5 +/- 0.5	5.0 +/- 0.5
25	25	7.5 +/- 0.5	4.0 +/- 0.5
0	0	10.0 +/- 0.5	1.0 +/- 0.5

40 MMBTU/Hr "Yankee" Hood Furnace:

Foxboro % Open	Windbox % Open	Gas Valve Screw Number	Jackshaft % Open x 100
100	100	9.5 +/- 0.5	10.0
75	75	7.5 +/- 0.5	7.5 +/- 0.5
50	50	5.0 +/- 0.5	5.0 +/- 0.5
25	25	2.5 +/- 0.5	2.5 +/- 0.5
0	0	1.0 +/- 0.5	0

These full range of settings shall be monitored, measured, and recorded every 6 months. Any deviation from the fuel and air settings detailed above, shall be considered a violation of this condition, unless the permittee can demonstrate compliance with the emission limits of Condition No. 1 by performing a source test using the methods detailed in Condition No. 3 below.

3. Once every 24 months, the permittee shall demonstrate compliance with the above NOx and CO emission limits for the 2X Paper Machine (consisting of the 70 MMBTU/Hr Hot Air Furnace and the 40 MMBTU/hr "Yankee" Hood Furnace) by performing a source test utilizing the following methods:

a.	NOx	ARB Method 100
b.	CO	ARB Method 100
c.	Stack Gas Oxygen	ARB Method 100

This emissions test shall be conducted by an independent party at the Hot Air / Predryer Furnace Stack (S-7A). No emissions test shall be conducted during start-up, shutdown or under breakdown conditions. Prior to conducting this test, the permittee shall notify the District Compliance Division. Written notification and a source test protocol, subject to District approval, shall be received no less than 15 calendar days prior to the test. Operating conditions during testing shall be approved with the source test protocol. The emissions test report and results shall be submitted to the District Compliance Division within 45 days after the test.

Ventura County Air Pollution Control District
Additional Requirements
Flue Gas Recirculation (FGR) Requirements
Babcock & Wilcox Steam Boiler

Rule 74.15, "Boilers, Steam Generators, and Process Heaters"
Adopted 11/8/94, Federally-Enforceable

Applicability:

This attachment applies to the 100 MMBTU/Hr Babcock and Wilcox Model FM 1854 Steam Boiler located at the Procter & Gamble Paper Products Company Oxnard facility. These requirements are in addition to any other specific or general requirements referenced in this permit. This attachment does not apply to a temporary boiler used in place of the 100 MMBTU/hr Babcock & Wilcox boiler as allowed by Attachment PO00015PC1, Condition No. 3.

Conditions:

1. The Babcock & Wilcox Steam Boiler external flue gas recirculation (FGR) system was set as follows during the most recent compliance demonstration:

   a. The manual adjustment of the FGR valve shall remain in the fully open position, except for a one hour period upon boiler start-up.

   b. The mechanical linkage of the fuel and air damper shall remain locked in the following position:

Screw Position	Bailey Positioner	Jackshaft Quadrant
10	100%	10.2 +/- 0.5
8	80%	8.2 +/- 0.5
6	59%	6.5 +/- 0.5
5	45%	5.5 +/- 0.5

   These operating parameters shall be monitored, measured, and recorded on a monthly basis. Any deviation from the FGR valve position of fully open, or any deviation from the mechanical linkage of the fuel and air damper positions detailed above, shall be considered a violation of this condition, unless the permittee can demonstrate compliance with the emission limits of Rule 74.15 (Attachment 74.15N1) by performing source testing as shown in Attachment 74.15N1. Attachment 74.15N1 is in Section No. 6 of this permit. (Rule 74.15)

Ventura County Air Pollution Control District
Additional Requirements
Particulate Matter Emission Requirements
1X Paper Machine, 2X Paper Machine, Wet Lapper, and Converting Line Room

Rule 26, "New Source Review"

Conditions applied pursuant to Rule 26 are federally enforceable.

Rule 52, "Particulate Matter - Concentration (Grain Loading)"
Adopted 04/13/04, Federally-Enforceable

Rule 53, "Particulate Matter - Process Weight"
Adopted 04/13/04, Federally-Enforceable

40 CFR Part 64, "Compliance Assurance Monitoring"
Federally-Enforceable

Applicability:

This attachment applies to the 1X Paper Machine, the 2X Paper Machine, the Wet Lapper, and the Converting Line Room located at the Procter & Gamble Paper Products Company Oxnard facility. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. Particulate matter (PM) emissions from the following equipment shall not exceed the corresponding pounds per hour (lb/hr) rates shown below:

Equipment	PM Emission Limits (lb/hr)
1X Paper Machine includes the following stacks: dryer exhaust (S-4A, S-4B) dry end exhaust (with scrubber) (S-5) vacuum exhaust (S-4C) wet end exhaust (S-4D) broke pulper vent (S-4E)	6.75
2X Paper Machine includes the following stacks: dryer exhaust (S-7A) dry end exhaust (with scrubber) (S-6)	3.99

vacuum exhaust (S-7C) wet end exhaust (S-7D) broke pulper vent (S-7E)	
Wet Lapper with Scrubber (S-1)	0.10

The emission limits shown above for the 1X and 2X Paper Machines represent maximum or peak hourly rates less the estimated PM emissions from the LM-2500 and LM-5000 turbines, respectively. Actual measured emissions must be appropriately adjusted for the turbine emissions prior to demonstrating compliance. (Rule 26)

2. In order to monitor compliance with the above PM limits, the daily average differential pressure across the venturi (inches water column) and the daily average liquor flow rate (gallons per minute) through the venturi scrubbers shall not be less than the following levels when the respective paper machine or washer/wet lapper is in operation:

Equipment	Inches Water Column (w.c.)	Gallons per Minute (gpm)
1X Paper Machine Dry End Scrubber (Stack No. S-5)	25.7	320
2X Paper Machine Dry End Scrubber (Stack No. S-6)	24.5	320
Wet Lapper and Scrubber (Stack No. S-1)	15.5	65

The permittee shall maintain records, comprised of hourly readings, of the daily average pressure differential across the venturi (inches water column) and the daily average liquor flow rate (gallons per minute) through the 1X and 2X dry end scrubbers and the Wet Lapper scrubber. The hourly readings shall be based on one reading taken per hour. These records shall be submitted to the District upon request. Daily average pressure differential or daily average liquor flow rates less than the specified limits above shall be considered a violation of this condition, unless the permittee can demonstrate compliance with the PM limits of Condition No. 1 above by alternate means subject to District approval. (Rule 26)

3. In addition to the above monitoring requirements for the 1X and 2X Paper Machine dry end scrubbers on and after July 1, 2004, the permittee shall comply with 40 CFR Part 64, "Compliance Assurance Monitoring", as follows:

a. On a daily basis, the permittee shall measure and record the daily average pressure differential across the venturi (inches water column) and the daily average liquor flow rate (gallons per minute) through the 1X and 2X Paper Machine dry end scrubbers. The daily average readings shall be based on data collected as defined in Condition No. 2 above (one reading taken per hour). If the 1X and/or 2X Paper Machines are not operated for an entire day, then a record of the daily average pressure differential and the daily average liquor flow rate for the respective scrubber(s) is not required. The permittee shall maintain a log indicating entire days in which the 1X and/or 2X Paper Machines were not operated.

b. A daily average pressure differential or a daily average liquor flow rate less than the limits specified in Condition No. 2 above shall be considered an excursion as defined in 40 CFR Part 64. An excursion is defined as "a departure from an indicator range established for monitoring" in 40 CFR Part 64. Upon detecting an excursion, the permittee shall inspect the scrubbers, make adjustments or repairs as necessary, and restore the pressure differential and liquor flow rates to the above minimum values as expeditiously as practicable in accordance with good air pollution control practices.

c. The differential pressure gauges and liquor flow meters shall be installed, calibrated, operated, and maintained in accordance with the permittee's written plan for these activities. This plan is subject to District approval and shall be made available to the District upon request.

d. In addition to the records required by Condition No. 2 above, the permittee shall maintain records of daily average pressure differential and daily average liquor flow rate for each scrubber, and for excursions as defined above, a summary of any corrective actions taken.

e. The permittee shall submit a semiannual written report to the District Compliance Division that includes the number and duration of excursions, the cause of the excursion (including unknown if applicable), and the corrective action taken. (40 CFR Part 64)

4. The permittee shall not discharge into the atmosphere, from the stacks of the 1X Paper Machine, 2X Paper Machine, and Wet Lapper, particulate matter in excess of the following limits:

a. Pursuant to Rule 52, a particulate matter concentration (grains per cubic foot of dry gas at standard conditions) in each stack exhaust as listed in the table shown in Rule 52 (Rule 52 Table).

b. Pursuant to Rule 53, a solid particulate matter discharge rate (pounds per hour) as listed in the table shown in Rule 53 (Rule 53 Table). The limits of Rule 53 apply individually to the 1X Paper Machine (combined stacks), 2X Paper Machine (combined stacks), and Wet Lapper.

For the purposes of Rules 52 and 53, "particulate matter" is any material, except uncombined water, that exists in a finely divided form as a liquid or solid at standard conditions. In addition, Rule 53 defines "solid particulate matter" as particulate matter that exists as a solid at standard conditions. (Rules 52 and 53)

5. In order to comply with Rule 52 and Rule 53, permittee shall comply with the particulate matter emission limits of Condition No. 1 above and the venturi scrubber operating parameters of Condition No. 2 above. Prior source testing has demonstrated compliance with the emission limitations of Condition No. 1 and Rules 52 and 53. No additional periodic monitoring requirements for Rule 52 and Rule 53 are required beyond the periodic monitoring requirements of Condition No. 2 above.

Upon District request, the permittee shall perform a source test to determine particulate matter emissions 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. However, the "solvent extract" portion of the particulate matter catch shall not be included in the total particulate catch for determining compliance with Rule 53. Any other appropriate test method may be used for compliance with Rules 52 and 53 with prior written approval by the District, California Air Resources Board, and the U.S. Environmental Protection Agency. (Rules 52 and 53).

6. Particulate matter emissions from the converting line rooms shall be recirculated through scrubbers and dust control baghouses which exhaust into the converting rooms and not to the atmosphere. (Rule 26)

Ventura County Air Pollution Control District
Additional Requirements
Reactive Organic Compound Emission Requirements
Manufacturing Chemicals for Ink and Additive Applications

Rule 26, "New Source Review"

Conditions applied pursuant to Rule 26 are federally enforceable.

Applicability:

This attachment applies to manufacturing chemicals used in ink and additive applications for producing, converting, and packaging toilet tissue and paper towels at the Procter & Gamble Paper Products Company Oxnard facility. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. The annual reactive organic compound (ROC) emissions from manufacturing chemicals shall not exceed 60 tons per year in any twelve month period. These manufacturing chemicals shall include all those containing ROC ingredients that are used to produce, convert, and package toilet tissue and paper towels.

   This emission limit was established Pursuant to Application No. 00015-114 (Permit to Operate issued July 22, 1996). The limit was initially 75 tons per year with a two percent reduction every year until 2006 and 60 tons per year.

2. In order to comply with the ROC limits presented in Condition No. 1 above, the permittee shall maintain monthly usage records of ROC-containing manufacturing chemicals. The records shall indicate the manufacturer's or Procter & Gamble's identification number, the amount of each additive used in pounds, the ROC content in weight percent as determined by the manufacturer or an independent testing laboratory, and the monthly ROC emissions (assuming all ROC calculated is emitted) for each material. Records of the rolling 12-month ROC emission totals shall be maintained at the facility and submitted to the District upon request.

Ventura County Air Pollution Control District
Additional Permit Requirements
Federal PSD Permit Requirements
Cogeneration Turbine (LM-6000), Cogeneration Turbine (LM-2500), Babcock & Wilcox Steam Boiler, 1X Paper Machine Hot Air Furnace, and 1X Paper Machine "Yankee" Hood Furnace

40 CFR Part 52.21, "Prevention of Significant Deterioration of Air Quality"
Federally-Enforceable

Applicability:

This attachment applies to the 49.9 MW General Electric Model LM-6000 Cogeneration Gas Turbine, the 22.7 MW General Electric Model LM-2500 Cogeneration Gas Turbine, the 100 MMBTU/Hr Babcock and Wilcox Model FM 1854 Steam Boiler, the 1X Paper Machine 150 MMBTU/Hr Hot Air Furnace, and the 1X Paper Machine "Yankee" Hood Furnace, consisting of two 14 MMBTU/Hr burners, located at the Procter & Gamble Paper Products Company Oxnard facility. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. In the event that any request to increase the permitted emissions would result in the total permitted emissions of nitrogen oxides from the 22.7 MW General Electric Model LM-2500 Cogeneration Gas Turbine, the 100 MMBTU/Hr Babcock and Wilcox Model FM 1854 Steam Boiler, the 1X Paper Machine 150 MMBTU/Hr Hot Air Furnace, and the 1X Paper Machine "Yankee" Hood Furnace, consisting of two 14 MMBTU/Hr burners, exceeding 250 tons per year, Procter & Gamble shall immediately submit an application for a federal PSD (Prevention of Significant Deterioration) permit for the 49.9 MW General Electric Model LM-6000 Cogeneration Gas Turbine.

Ventura County Air Pollution Control District
Additional Permit Requirements
Emission Reduction Credit Certificate No. 1166

Rule 26.4, "New Source Review – Emission Banking"

Conditions applied pursuant to Rule 26.4 are federally enforceable.

Applicability:

Pursuant to Application No. 00015-250, Procter & Gamble Paper Products Company received Emission Reduction Credit (ERC) Certificate No. 1166 for the paving of a 650 feet by 470 feet parking lot used for product delivery truck trailers. This attachment applies to the entire Procter & Gamble stationary source located at 800 North Rice Avenue, Oxnard. Procter & Gamble is subject to the requirements below in order make the PM10 ERCs of Application No. 00015-250 enforceable and permanent.

Conditions:

1. To ensure that the reduction in PM-10 emissions from the parking lot paving project is permanent and enforceable, all motor vehicular parking and motor vehicular traffic at the Procter & Gamble stationary source shall be conducted on paved roads or paved parking lots. The paved roads and paved parking lots shall be maintained in good working condition and shall be kept reasonably clean. There shall be no unpaved areas at the stationary source that are readily accessible to motor vehicles.

   This condition does not apply to non-routine access to the stationary source for emergencies or for maintenance and construction activities. This condition does not apply to any piece of land at the stationary source that is being actively used for agricultural purposes.

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.

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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 periodic 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. Records of zero percent visual emissions are not required.

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

4. Monitoring of the sulfur content of landfill or oilfield gaseous fuel by the permittee shall be at least quarterly if any of the following conditions apply:

   a. Any sulfur measurement exceeds 394 ppmv, calculated as hydrogen sulfide at standard conditions.

   b. A stationary source is new.

   c. The permittee has not reported historical measurements of hydrogen sulfide of the landfill or oilfield gaseous fuel performed within the previous three years in writing to the District for a stationary source.

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

   a. During four consecutive calendar quarters, each sulfur content measurement shall not exceed 394 ppmv, calculated as hydrogen sulfide at standard conditions, and

   b. Submit a written request to the District for a reduction in monitoring frequency. This request shall contain backup documentation including monitoring reports that document the above provision. Requests for a reduction in monitoring frequency are not effective until written approval by the District is received by the operator.

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

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

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

Applicability:

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

Conditions:

1. Pursuant to Rule 64, no person shall burn any liquid fuels with a sulfur content in excess of 0.5 percent, by weight, unless specifically exempted by Rule 64.

2. If only ARB-quality reformulated gasoline or ARB-certified diesel fuel is combusted at this facility, it will be assumed that the permittee is complying with Rule 64 without additional periodic monitoring requirements. Any person claiming this exemption shall maintain records sufficient to substantiate the use of these fuels.

3. If other than ARB-quality reformulated gasoline or ARB-certified diesel fuel is being combusted, for each liquid fuel delivery permittee shall either obtain the fuel supplier's certification, or shall test the sulfur content of the fuel using ASTM Method D4294-98 or D2622-98, to ensure that compliance with Rule 64 is being maintained. For liquid fuels, operators of electric power generation units may use the sampling and analysis methods prescribed in Code of Federal Regulations 40CFR Part 75 Appendix D.2.2. The fuel supplier's certification may be provided once for each purchase lot, if records are kept of the purchase lot number of each delivery.

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

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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^{o}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^{o}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^{o}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 conduct periodic facility inspections, and an annual compliance certification 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.

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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 conduct periodic facility inspections and an annual compliance certification of architectural coating operations 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. The VOC coating records 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 74.28 Applicable Requirements
Asphalt Roofing Operations

Rule 74.28, "Asphalt Roofing Operations"
Adopted 05/10/94, Federally-Enforceable

Applicability:

This attachment applies to short term activities involving operation of equipment used for melting, heating, or holding asphalt or coal tar pitch. The permittee shall insure that all asphalt roofing operations comply with Rule 74.28.

The District does not require permits for asphalt roofing operations as they are exempt from permit pursuant to District Rule 23, "Exemptions From Permit", as detailed in Rule 23.F.16 as "equipment for melting and applying coatings of oils, waxes, greases, resins, and like substances where no reactive organic solvents, diluents or thinners are used.

Conditions:

1. Pursuant to Rule 74.28.B.1, no person shall operate or use equipment subject to this rule for the on-site construction, installation, or repair of roofs unless the vapors from such equipment are contained by one or more close fitting lids. The lid(s) shall not be opened except for loading the kettle with solid roofing material or unless the material in the roofing kettle is less than 150°F.

2. Pursuant to Rule 74.28.B.2, the maximum temperature of the material inside a roofing kettle shall be 500°F for asphalt and 400°F for coal tar pitch.

3. Pursuant to Rule 74.28.B.3, the ROC vapors from the kettle shall be contained by a close fitting lid during a roofing kettle draining operation. Within two minutes after the draining operation has been completed, the vessel that received the hot roofing material shall be covered with a close fitting lid or capped to prevent the release of visible smoke from the vessel.

4. Pursuant to Rule 74.28.B.4., any kettle vent shall remain closed except during a pressure release caused by flashing of the roofing material.

5. During times when asphalt roofing operations are underway at the facility, permittee shall ensure that all applicable requirements of Rule 74.28 are met.

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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.

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

40 CFR Part 72, "Permits Regulation"

40 CFR Part 73, "Sulfur Dioxide Allowance System"

40 CFR Part 74, "Sulfur Dioxide Opt-Ins"

40 CFR Part 75, "Continuous Emission Monitoring"

40 CFR Part 76, "Acid Rain Nitrogen Oxides Emission Reduction Program"

40 CFR Part 77, "Excess Emissions"

40 CFR Part 78, "Appeal Procedures for Acid Rain Program"

Permit Shield:

The Acid Rain Program requirements listed above have been reviewed; and it has been determined that they are not applicable to the LM-6000 natural gas-fired turbine and to the LM-2500 natural gas-fired turbine at this stationary source. The following discussion details the determination of this permit shield for the LM-6000 natural gas-fired turbine that drives a 49.9 MW electrical generator, and the LM-2500 natural gas-fired turbine that drives a 22.7 MW electrical generator.

LM-6000 Turbine

Pursuant to 40 CFR Part 72.6(b)(5), a qualifying facility that (1) as of November 15, 1990, had a power purchase agreement to sell at least 15% of its total planned net output capacity and (2) the total installed net output capacity does not exceed 130% of its total planned net output capacity is not an affected unit subject to the requirements of the Acid Rain Program.

Per 40 CFR Part 72.2, the term *qualifying facility* means a "qualifying small power production facility" within the meaning of section 3(17)(C) of the Federal Power Act or a "qualifying cogeneration facility" within the meaning of section 3(18)(B) of the Federal Power Act. Per Section 3(18)(B), "qualifying cogeneration facility" means a cogeneration facility which (1) the Commission determines, by rule, meets such requirements (including requirements respecting minimum size, fuel use, and fuel efficiency) as the Commission may, by rule, prescribe; and (2) is owned by a person not primarily engaged in the generation or sale of electric power (other than electric power solely from cogeneration facilities or small power production facilities).

Procter and Gamble has demonstrated that the LM-6000 turbine meets the requirements of a "qualifying cogeneration facility".

A power purchase contract between Southern California Edison and Procter and Gamble was in place beginning April 16, 1985 and remains in effect through December 31, 2019. The contract includes a commitment of 45 megawatts, which is greater than 15% of the LM-6000 turbine's total planned net output capacity. The total installed net output capacity of the LM-6000 gas turbine is 47.5 megawatts. The ratio of the total installed net output capacity and the total planned net output capacity is 106%. The output capacity of the LM-2500 is not included in the ratio because the LM-2500 is not part of the power purchase agreement. The output of the LM-2500 is used solely for the Procter & Gamble facility.

LM-2500 Turbine

Pursuant to 40 CFR Part 72.6(b)(1), a simple combustion turbine that commenced operation before November 15, 1990 is not an affected unit subject to the requirements of the Acid Rain Program. A simple combustion turbine is a unit that is a rotary engine driven by a gas under pressure that is created by the combustion of any fuel. This term includes combined cycle units without auxiliary firing. A combined cycle unit captures the hot air exiting the turbine through a heat recovery steam generator or a waste heat boiler. Since the LM-2500 turbine is a combined cycle unit without auxiliary firing that commenced operation before November 15, 1990, the unit is not subject to the Acid Rain Program.

This permit shield shall remain in effect as long as: (1) no physical modification is made to the LM-2500 gas turbine that would make it an affected unit, and (2) the applicability requirements of the Acid Rain Program do not change such that either of the turbines becomes an affected unit.

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

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

Permit Shield:

The requirements of 40 CFR Part 60, Subpart KKKK, "Standards of Performance 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 and GE LM-2500 turbines. The units are fired on natural gas only.

Discussion:

40 CFR Part 60, Subpart KKKK, is applicable to 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. The GE LM-6000 turbine is rated at approximately 472.5 MMBTU/hr and the GE LM-2500 turbine is rated at approximately 288.75 MMBTU/hr; however, both units were constructed prior to February 18, 2005. The Part 70 Permit Modification application was submitted for the GE LM-6000 turbine on March 11, 2004. Authority to Construct No. 00015-290 was issued on January 21, 2004 for the GE LM-6000 turbine. The GE LM-2500 turbine has been permitted prior to the initial Part 70 Permit No. 00015 issuance on January 1, 1999.

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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 and GE LM-2500 turbines. The units are 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 The Procter & Gamble Paper Products Company Oxnard facility do not exceed these HAP thresholds; therefore, the stationary source is not a major source of HAP emissions. The HAP emissions for the stationary source are shown in the Reissuance Application. Also, the turbines are classified in the MACT as "existing stationary combustion turbines"; and therefore, would not be required to meet the requirements of Subpart YYYY or Subpart A, including the initial notification requirements, even if the facility was a major source of HAPs.

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Ventura County Air Pollution Control District
Permit Shield – Standards of Performance for
Stationary Compression Ignition Internal Combustion Engines
40 CFR Part 60, Subpart IIII

40 CFR Part 60, Subpart IIII, "Standards of Performance for Stationary Compression Ignition Internal Combustion Engines"

Permit Shield:

The requirements of 40 CFR Part 60, Subpart IIII, "Standards of Performance for Stationary Compression Ignition Internal Combustion Engines" have been reviewed; and it has been determined that this federal regulation is not currently applicable to this stationary source. The following discussion details the determination of this permit shield for the four stationary emergency compression ignition internal combustion engines at this stationary source.

Discussion:

40 CFR Part 60, Subpart IIII, is applicable to stationary compression ignition internal combustion engines that, depending on the type and size of engine, was manufactured, constructed, or reconstructed in 2005, 2006, or 2007. The stationary internal combustion engines at this stationary source were all manufactured and constructed prior to the applicable dates. The units have not been reconstructed.

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Ventura County Air Pollution Control District
Permit Shield - New Source Performance Standards
40 CFR Part 60, Subpart Dc

40 CFR Part 60, Subpart Dc, "Standards of Performance for Small Industrial - Commercial - Institutional Steam Generating Units"

Permit Shield:

The New Source Performance Standard listed above has been reviewed; and it has been determined that it is not applicable to this stationary source. The following discussion details the determination of this permit shield for the 100 MMBTU/Hr Babcock and Wilcox, Model FM 1854, natural gas steam boiler. The unit is equipped with flue gas recirculation and a low NOx burner (Coen Model 675/DAF-32).

Subpart Dc is applicable to steam generating units with a maximum design heat capacity of 100 MMBTU or less, but greater than or equal to 10 MMBTU/hr in which construction, modification, or reconstruction commenced after June 9, 1989. The Babcock and Wilcox boiler meets the size requirements; but has been in operations since prior to June 9, 1989. The unit has not been modified or reconstructed as defined 40 CFR Part 60, Subpart A.

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Ventura County Air Pollution Control District
Permit Shield – Standards of Performance for
National Emissions Standards for Hazardous Air Pollutants
For Industrial, Commercial, and Institutional Boilers and Process Heaters
40 CFR Part 63, Subpart DDDDD

40 CFR Part 63, Subpart DDDDD, "National Emissions Standards for Hazardous Air Pollutants For Industrial, Commercial, and Institutional Boilers and Process Heaters"

Permit Shield:

The requirements of 40 CFR Part 63, Subpart DDDDD, "National Emissions Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters" have been reviewed; and it has been determined that this federal regulation is not currently applicable to this stationary source. The following discussion details the determination of this permit shield for the emissions units at this stationary source.

Discussion:

The 1X Paper Machine and the 2X Paper Machine furnaces are direct fired units and are not process heaters as defined in 40 CFR Part 63, Subpart DDDDD. Therefore, Subpart DDDDD does not apply to the paper machine furnaces.

40 CFR Part 63, Subpart DDDDD, is applicable to boilers and process heaters located at major sources of hazardous air pollutant (HAP) emissions. This stationary source is not a major source of HAP emissions. Therefore, Subpart DDDDD is not applicable to any emissions units at this stationary source, including the 100 MMBTU/hr Babcock & Wilcox boiler or any temporary replacements of that unit.

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Ventura County Air Pollution Control District
Permit Shield – Standards of Performance for
National Emissions Standards for Hazardous Air Pollutants
For Industrial, Commercial, and Institutional Boilers Area Sources
40 CFR Part 63, Subpart JJJJJJ

40 CFR Part 63, Subpart JJJJJJ, "National Emissions Standards for Hazardous Air Pollutants For Industrial, Commercial, and Institutional Boilers Area Sources"

Permit Shield:

The requirements of 40 CFR Part 63, Subpart JJJJJJ, "National Emissions Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources" have been reviewed; and it has been determined that this federal regulation is not currently applicable to this stationary source. The following discussion details the determination of this permit shield for the emissions units at this stationary source.

Discussion:

40 CFR Part 63, Subpart JJJJJJ, is applicable to boilers located at area sources of hazardous air pollutant (HAP) emissions. An area source is a stationary source that does not meet the requirements of a major source. This stationary source is an area source.

Pursuant to Section 63.1195(e) of Subpart JJJJJJ, gas-fired boilers are exempt from the requirements and standards of this subpart. The 100 MMBTU/hr Babcock & Wilcox boiler, and any temporary replacement is gas-fired. Therefore, the Babcock & Wilcox boiler, and any temporary replacement, is not subject to Subpart JJJJJJ.

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

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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 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.

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.

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

40 CFR Part 82, "Protection of Stratospheric Ozone"
40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners"
40 CFR Part 82, Subpart F, "Recycling and Emissions Reduction"
Federally-Enforceable
Last revised 04/10/15

Applicability:

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

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

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

As defined in 40 CFR82.152, appliance means any device which contains and uses a refrigerant and which is used for household or commercial purposes, including any air conditioner, refrigerator, chiller, or freezer. Refrigerant means, for purposes of this subpart, any substance consisting in part or whole of a class I or class II ozone-depleting substance that is used for heat transfer purposes and provides a cooling effect.

Conditions:

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

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

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

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

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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.

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