VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT

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

DRAFT

PART 70 PERMIT

Number 01494

Permit Term: January 1, 2023 to December 31, 2027

Company Name / Address:
Chevron U.S.A. Inc.
3916 State St., Suite 200
Santa Barbara, CA 93105

Facility Name / Address:
Platform Gail
OCS Lease P-0205
Offshore of Ventura, CA

Responsible Official:
Ms. Rebecca Trujillo
Regulatory Manager
805/979-3506

Title V Contact:
Ms. Rebecca Trujillo
Regulatory Manager
805/979-3506

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

ISSUE DATE

PART 70 PERMIT NO. 01494
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01494-551 01494-561	04/30/18	01494-551: Permit Reissuance for Period Terminating December 31, 2022 01494-561: TOO to Beacon West Energy Group, LLC	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 an oil platform, Platform Gail, located offshore of Ventura, California. The platform is located in the Outer Continental Shelf (OCS) Area which is the offshore waters between three (3) and twenty-five (25) miles out from the coastline. The platform has been designated to the VCAPCD as the corresponding onshore area by the U.S. EPA. The source is a crude oil production facility and has a Standard Industrial Classification (SIC) Code of 1311, Crude Oil Production. The emission units include various oil production and processing equipment, including wells, tanks, flares, natural gas fired engines, and diesel engines. Note that oil and gas production ceased in 2017 and the platform is currently in the final phase of the decommissioning process. Completion of the plugging and abandonment (P&A) of wells occurred in November 2023, and the majority of the permitted equipment, including the flares and turbines, have been removed from service. As of November 17, 2023, the platform has switched to solar-powered electricity with a 49 BHP diesel standby generator as backup that is permit-exempt since it is less than 50 BHP.

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. 6 of the permit. In addition, "Short Term Activities" as listed in Section No. 10 of the permit are subject to certain rules and regulations. 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 as Ventura County has a "Serious" Nonattainment Classification with the federal ozone standard. 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. 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 diesel fuel in the crane engines and the emergency standby engine used for fire suppression. Criteria pollutants are also emitted from the diesel engines associated with the crew boats and work

boats. Reactive Organic Compound (ROC) emissions resulting from the produced water tank, oil skim tank, sump tank, production drain tank, and deck drain pit (containment berm) are negligible since this equipment is no longer in hydrocarbon service.

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. Most Maximum Achievable Control Technology (MACT) standards only apply to major sources of hazardous air pollutants. As an Area (non-major) Source of hazardous air pollutants, there is one MACT that is applicable to this facility: "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Engines" (RICE MACT – 40 CFR Part 63, Subpart ZZZZ). The Part 70 Permit re-issuance application includes a summary of HAPs emissions (in the units of pounds per year). The purpose 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. Platform Gail has not been subject to the State of California AB2588 Air Toxics "Hot Spot" Program because of its offshore location.

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

The CO_2 potential to emit for this stationary source has been calculated to be 4,215.03 tons per year. The District's potential to emit is based on the permitted annual combustion and operational (hours per year) limits listed in Table No. 3 of the permit. The District has used emission factors from the Regulation For The Mandatory Reporting of Greenhouse Gas Emissions, California Code of Regulations, title 17, Subchapter 10, Article 2, sections 95100 to 95133; Appendix A, Table 4. This CO2 potential to emit does not include insignificant activities or equipment exempt from permit pursuant to Rule 23, "Exemptions From Permit." District GHG calculations can be found in the Application 01493-591 file.

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, 2013, to March 15, 2024, the facility received five (5) Notice of Violations (NOVs) as detailed in the "NOV by Facility" history for Facility No. 01494 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. 12, "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

At the time of permit reissuance, there is no production of oil and gas from existing wells. Completion of the plugging and abandonment (P&A) of wells occurred in November 2023, and the majority of the permitted equipment has been removed from service. The remaining four (4) tanks still operating at this facility that are subject to Rule 71.1, "Crude Oil Production and Separation" are currently in water service only and are therefore exempt from vapor recovery under Rule 71.1.D.3.
Rule 74.9, "Stationary Internal Combustion Engines," exempts diesel engines used to power cranes from the emission limits of the rule. The emergency standby engine used for fire suppression is exempt from Rule 74.9 because it is only operated during an emergency or during maintenance operation of no more than 50 hours per calendar year. The crane engines and emergency standby engine are required to comply with the recordkeeping and reporting requirements of Rule 74.9. These diesel engines must comply with the operational requirements (no emission limits) of the EPA MACT for Reciprocating Internal Combustion Engines (RICE), 40 CFR, Part 63, Subpart ZZZZ.

The diesel crane engines and emergency standby engine are subject to the California Airborne Toxic Control Measure (ATCM) For Stationary Compression Ignition Engines; however, the ATCM exempts engines operated on OCS Platforms from the emission standards of the ATCM. The engines are required to comply with the fuel and the recordkeeping requirements of the ATCM.

The oil platform is located in the Outer Continental Shelf; and therefore, is subject to 40 CFR Part 55, "Outer Continental Shelf Air Regulations." 40 CFR Part 55 includes the District rules by reference, thereby making them federally enforceable. The most recent rule consistency update for VCAPCD rules in 40 CFR Part 55 is effective October 18, 2017. At the time of Application No. 01494-591 Part 70 Permit Reissuance the VCAPCD rules referenced in this Part 70 Permit are referenced in 40 CFR Part 55; with the exception of the following rules: Rule 71.1, "Crude Oil Production and Separation," and Rule 74.6, "Surface Cleaning and Degreasing." The applicable requirements for these two rules contained in this permit are based on the current VCAPCD revisions of the rules. Compliance with the applicable requirements for these rules contained in this permit will ensure compliance with both the District rules and the rules that are referenced in 40 CFR Part 55.
40 CFR Part 55 does not provide the authority to control the emissions from the vessels that service the platform, but does require that the vessel emissions be included in the permitted emissions for the OCS source. Therefore, the engines on the work boats and crew boats servicing the platform and the permitted emissions for the engines are included in the Part 70 permit. The crew boat and work boat engines are subject to the California Airborne Toxic Control Measure (ATCM) For Diesel Engines On Commercial Harbor Craft Operated Within California Waters And 24 Nautical Miles Of The California Baseline. The permitted emissions for the crew boat and work boat engines are based on EPA Tier 2 Standards, per Table 2 of the ATCM.

This stationary source has stated that 40 CFR Part 68, "Chemical Accident Prevention Provisions," is not an applicable requirement. Therefore, a federal Risk Management Plan, pursuant to section 112(r) of the federal Clean Air Act as amended, is not required.

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. 01494 was initially issued on January 1, 1998. A portion of the permit revisions are described in further detail below. The District's Engineering Analysis for each application can also be consulted for further details.

Application No. 01494-311: Application No. 01494-311 is for the reissuance of Part 70 Permit No. 01494 for the period January 1, 2003 to December 31, 2007. The following items summarize the changes from the initial Part 70 Permit No. 01494 (January 1, 1998 to December 31, 2002):

- This "Stationary Source Description" has been added to the permit. It was not included in the initial Part 70 Permit No. 01494.
- Section No. 6, "Exempt Equipment List", has been revised. The permit identifies some of the emissions units as exempt pursuant to Rule 23, but not as "insignificant activities" pursuant to Rule 33.1.10.
- An attachment detailing the requirements of Rule 74.9, "Stationary Internal Combustion Engines", that apply to emergency standby stationary internal combustion engines rated at 50

or more horsepower and operated during an emergency or maintenance operation has been added to the permit. Rule 23.D.7 exempts these units from permit requirements. These units have been specifically listed in the Insignificant Activities Table and now are also generally listed in Tables 2, 3, and 4 of the permit.

- 40 CFR Part 64, "Compliance Assurance Monitoring", requirements for the Allison turbines have been included in the permit.
- An attachment detailing the applicable requirements for Rule 74.11.1, "Large Water Heaters and Small Boilers", has been added to the permit.
- The modifications to the Oil Well List pursuant to Minor Part 70 Permit Modification Application No. 01494-251 are included in this permit.
- 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. 01494:
  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 74.9, "Stationary Internal Combustion Engines"
  i) Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities"
  j) Rule 74.16, "Oilfield Drilling Operations"
  k) Rule 74.23, "Stationary Gas Turbines"

Application Nos. 01494-372 and 01494-421: Application No. 01494-421 is for the reissuance of Part 70 Permit No. 01494 for the period terminating December 31, 2012. Application No. 01494-372 is for the permitting of Turbine G-1 with Selective Catalytic Reduction (SCR) pursuant to Authority to Construct No. 01494-370. The following items summarize the changes due to this reissuance application:

- Tables 2, 3, and 4 and Permit Attachments 74.23N2/1494 and PO1494PC4 include revisions for Application No. 01494-372.
- The wipe cleaning operation has been removed from the permit due to changes in Rule 23, "Exemptions From Permit". There is a reduction in the permitted emissions as a result of removing the wipe cleaning operation from the permitted emissions table. Rule 74.6, "Surface Cleaning and Degreasing", will remain part of the permit in the "General Requirements" section.
- Revisions have been made to the Insignificant Activities Table.
- Revisions have been made to Attachment 74.16 which lists the requirements of Rule 74.16, "Oilfield Drilling Operations". The permitting status of associated equipment has been clarified.

- Applicability status to the federal MACT standards for the turbines has been clarified and permit shields for 40 CFR Part 60, Subpart KKKK and 40 CFR Part 63, Subpart YYYY have been included.
- The permit attachment for the California ATCM for Stationary Compression Ignition (CI) Engines requirements has been updated to reflect the 10/18/07 revisions to the regulation.
- The following District rules have been revised and/or revisions of the rule have been adopted into the State Implementation Plan (SIP) since the January 1, 2003 to December 31, 2007 reissuance:
  a) Rule 23, "Exemptions From Permit"
  b) Rule 50, "Opacity"
  c) Rule 52, "Particulate Matter – Concentration (Grain Loading)" (No longer applicable)
  d) Rule 57.1, "Particulate Matter Emissions From Fuel Burning Equipment"
  e) Rule 74.2, "Architectural Coatings"

Application Nos. 01494-301 and 01494-373: Application No. 01494-301 is for the permitting of modifications to the Oil Well List pursuant to Authority to Construct No. 01494-300 (issued June 10, 2002) and some additional Oil Well List changes that were not included in the Authority to Construct. Application No. 01494-373 is for the permitting of Turbines G-2 and G-3 with Selective Catalytic Reduction (SCR) pursuant to Authority to Construct No. 01494-370 (issued May 16, 2006).

Application Nos. 01494-481 and 01494-501: Application No. 01494-501 is for the reissuance of Part 70 Permit No. 01494 for the period terminating December 31, 2017. Application No. 01494-481 is for the replacement of two wells on the oil well list pursuant to Authority to Construct No. 01494-480. The following items summarize the changes due to this reissuance application:

- A discussion of Greenhouse Gases (GHGs) has been included in the Permit Summary and Statement of Basis.
- The permit attachment for the California ATCM for Stationary Compression Ignition (CI) Engines requirements has been updated to reflect the 05/19/11 revisions to the regulation.
- Permit attachments have been added to the permit for the "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT).
- The following District rules have been revised and/or revisions of the rule have been adopted into the State Implementation Plan (SIP) since the reissuance for the permit terminating December 31, 2012:
  a) Rule 74.2, "Architectural Coatings"
  b) Rule 74.9, "Stationary Internal Combustion Engines"
  c) Rule 74.11.1, "Large Water Heaters and Small Boilers"

Application Nos. 01494-551 and 01494-561: Application No. 01494-551 is for the reissuance of Part 70 Permit No. 01494 for the period terminating December 31, 2022. Application No.

01494-561 is for the transfer of ownership of the facility to Beacon West Energy Group, LLC. The following items summarize the changes due to the reissuance application:

- A permit condition attachment for 40 CFR Part 60, Subpart OOOO, "Standards of Performance (NSPS) for Crude Oil and Natural Gas Production, Transmission, and Distribution," has been added to the permit.
- Reduced the permitted emissions for the crew boat and work boat engines to the EPA Tier 2 Standards pursuant to California Airborne Toxic Control Measure (ATCM) For Diesel Engines On Commercial Harbor Craft Operated Within California Waters And 24 Nautical Miles Of The California Baseline. Resulted in changes to Table 3, Table 4, and Attachment PO1494PC1.
- The following District rules have been revised and/or revisions of the rule have been adopted into the State Implementation Plan (SIP) since the reissuance for the permit terminating December 31, 2012:
  a) Rule 54, "Sulfur Compounds"
- 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) Rule 74.9N9, "Stationary Internal Combustion Engines" – Stationary Diesel-Fired Internal Combustion Engines Used to Power Cranes and Welding Equipment
  f) 40 CFR Part 82, "Protection of Stratospheric Ozone"

Application No. 01494-581: Application No. 01494-581 is for the permitting of a 634 BHP John Deere backup generator engine G-04, which replaced the 1300 BHP Detroit Diesel backup generator engine since it was no longer operable, pursuant to Authority to Construct No. 01494-580 (issued February 24, 2021).

Application Nos. 01494-571, 01494-591, 01494-601, 01494-611, 01494-621, 01494-631, 01494-641, and 01494-651:

Application No. 01494-571 was for modifying the annual natural gas fuel limits for the three (3) turbines; Application No. 01494-611 was to change the 634 BHP generator engine (G-04) from a backup engine to a primary engine in place of the turbines; Application No. 01494-621 to operate a 919 BHP engine as backup to the 634 BHP primary engine; Application No. 01494-631 was for obtaining ERCs for shutting down the three (3) turbines; Application No. 01494-641 was to change the 919 BHP generator engine from a backup engine to a primary engine in place of the failed 634 BHP engine. Note that as of November 2023, solar power became the primary power source of electricity on Platform Grace and the turbines, diesel-fired generators and diesel backup generator were no longer needed. Therefore, all of the primary power turbines, generators, and backup generators have been removed from the Title V Permit.

Application No. 01494-591 is for the reissuance of Part 70 Permit No. 01494 for the period terminating December 31, 2027.
Application No. 01494-601 is for increasing the brake horsepower (BHP) of the work boat engines from 5,938 BHP to 7,880 BHP in order to incorporate a new work boat to the fleet. In addition, this application is for increasing the annual fuel throughput limit from 114,000 gallons per year to 300,000 gallons per year as part of the decommissioning process.
Application No 01494-651 is for a transfer the ownership of the facility from Beacon West Energy Group, LLC to Chevron U.S.A Inc.

The following items summarize the changes due to the reissuance application (01494-591) and Application No. 01493-601:

- Reduced the permitted emissions due to the removal of several permitted equipment units including tanks, CPI units, vessels, a sump, a scrubber, a glycol reboiler, flares, all three (3) turbines and turbine starters, all oil wells, all gas-fired engines, and all diesel-fired engines except the cranes, crew boats, and work boats, as part of the final phase of the decommissioning process. This resulted in changes to the Periodic Monitoring Summary, Table 2, Table 3, Table 4, Exempt Equipment List, Attachment PO1494PC1, and Attachment 71.1N1 was replaced with Attachment 71.1N4. In addition, the following sections have been removed from the permit: Oil Well List; Attachment 71.1N1; Attachment 71.1N6; Attachment 71.5N1; Attachment 74.9N8; Attachment 74.23N21494; Attachment NSPS GG; Attachment 40CFR60IIIIN1; Attachments PO1494PC2 and PO1494PC4; Attachments 71.1.C, 71.4.B.1, 71.4.B.3, 74.10, and 74.16N1494; Attachments SHIELD 60KKKK and SHIELD 60YYYY; and Attachment 40CFR60OOOO.
- The work boat engines descriptions were modified and brake horsepower was increased to accommodate a new work boat; and the annual throughput limit was increased as part of the decommissioning process. This resulted in changes to Tables 3 and Table 4, and Attachment PO1494PC1.
- The following District rules have been revised and/or revisions of the rule have been adopted into the State Implementation Plan (SIP) since the reissuance for the permit terminating in 2023:
  a) Rule 50 (Attachment revised/updated, not rule)
  b) Rule 71.1 (Not SIP-Approved)
  c) Rule 74.2
  d) Rule 74.6
- The following attachments have been revised since the reissuance for the permit terminating in 2023:
  a) Attachment 749N7
  b) Attachment CFR63ZZZZN3

NOV by Facility

Since January 1, 2013

Facility selected

01494

Facility No 01494 Platform Gail

NOV Date	NOV No	Rule Number	Comment	Settlement	Date Closed
03/07/2013	22872	029.C	Permit Condition Not Met - Exceeding Diesel Fuel Throughput	$4,000.00	03/28/2013
06/05/2013	22580		Failure To Record Data - Gas Turbine	$2,500.00	06/26/2013
06/09/2016	23311	010.B	Operating Without A Permit - Oilfield	$5,000.00	07/05/2016
04/15/2020	24258	029.C	ICIS AIR CASE FILE #CAVCAA80858 Exceeded limit for planned flaring gas consumption.	$5,000.00	05/05/2020
10/30/2020	24264	074.10	ICIS AIR CASE FILE #CAVCAA84097 Did not complete the quarterly LDAR Inspection for 2020-Q2. Rule 74.10.D.5.	$2,000.00	11/25/2020

10/06/2023	24839	029.C	Case File ID: CAVCAA107173 Exceeding the fuel limit for the Crane Engines. Reported: 24,519 gal - Limit: 21,339 gal/yr - Exceedances of the 12-month limit occurred in June, July, and August 2023 (Mr. Garnet provided the August data, also attached. Note that the crane use is the only accurate number on the august throughput/consumption spreadsheet. - Exceedances for the months following August 2023, as the running 12-month fuel use totals come back down, will not be counted as new violations in future inspections. This violation is intended to cover the burst of crane use during the final stages of well abandonment and cold stacking.	$15,000.00	12/18/2023
Total for 6 NOVs				$33,500.00	

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
71.1N4	Rules 71.1.D.3, 74.10	•Annual compliance certification including independent laboratory analysis results	•Validation of tank exemption (lab results)	None	•ROC content of crude oil - EPA Method 8015D Nonhalogenated Organics Using GC/FID	
74.9N7	Rule 74.9.D.3	•Annual compliance certification • Hours of operation	•Records of operating hours •Date, time, duration, and reason for emergency operation •Records of engine data	None	None	
74.9N9	Rule 74.9.D.9	•Annual compliance certification •Maintain data to ensure diesel-fired engine is used to power cranes and welding equipment only	•Records of engine data including engine function (usage), manufacturer, model number, operator identification number, and engine location	None	•None	
PO1494PC1 - Condition No. 1	Rules 29 General Recordkeeping	•Annual compliance certification •Monthly records of throughput and consumption	•Monthly records	None	None	

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	
ATCM Engine N3	ATCM for Stationary Compression Ignition Engines – OCS	•Fuel type records •Fuel use records	•Fuel type records •Fuel use records	None	None	
40CFR63ZZZZ3	RICE MACT for emergency diesel engines – oil change and inspections	•Maintenance records •Use of non-resettable hour meter •Annual compliance certification	•Maintenance records •Hours of operation records	None	None	
40CFR63ZZZZ4	RICE MACT for non-emergency diesel ≤ 300 HP – oil change and inspections	•Maintenance records •Annual compliance certification	•Maintenance records	None	None	
40CFR63ZZZZ6 - 1494	RICE MACT for non-emergency diesel engines > 500 HP, CO ppm limit	•CO source testing every three years •CEMS or CPMS optional •Annual compliance certification	•CO testing records	As specified in Sections 63.6650(c)(1) – (6)	Portable analyzer, or EPA Methods 3, 4, and 10 or their designated alternatives	

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
PO1494PC1 - Condition No. 1	Rules 29 General Recordkeeping	•Annual compliance certification •Monthly records of throughput and consumption	•Monthly records	None	None	
PO1494PC1 - Condition No. 2	Rule 29 Maximum Sulfur Content of Diesel Fuel	•Fuel records or fuel supplier certification containing sulfur content of each diesel fuel delivery •Annual compliance certification	Fuel records	None	None	
PO1494PC1 - Condition No. 3	Rules 26 and 29 Crew Boat and Work Boat Emission Limits	•Diesel fuel consumption for boats servicing Platforms Grace and Gail •Annual compliance certification	•Monthly records of diesel fuel consumption	None	None	

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
PO1494PC1 – Condition No. 4	Boat engine permitted emissions information	•Information only	•Information only			
PO1494PC1 – Condition No. 5	Rule 29 Crew Boats Shall Not Be Used Simultaneously	•Maintain a log book of hours and days of crew boat operation •Annual compliance certification	•Maintain a log book of hours and days of crew boat operation	None	None	
PO1494PC1 – Condition No. 6	Rule 29 Work Boats Shall Not Be Used Simultaneously	•Maintain a log book of hours and days of work boat operation •Annual compliance certification	•Maintain a log book of hours and days of work boat operation	None	None	
PO1494PC1 - Condition No. 7	Rule 29 Solvent Recordkeeping	•Monthly records of solvent purchase and usage •Annual compliance certification	•Monthly records of solvent purchase and usage	None	None	
PO1494PC3	Rules 29 and 71.4 Drain Pit Operation	•Annual compliance certification	None	None	None	Function of the pit is to act as a containment berm

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 (OCS)	Rule 54.B.1	•Annual compliance certification •Identify planned vs. unplanned flaring event •Identify date, time, duration, flare volume, and estimated sulfur emissions per flare event •Upon request, source test for sulfur compounds at point of discharge	•Representative fuel analysis or exhaust analysis and compliance demonstration •Flare records	None	•Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A,16B, or SCAQMD Method 307-91, as appropriate	

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
54.B.2 (OCS)	Rule 54.B.2	•Annual compliance certification •Identify planned vs. unplanned flaring event •Identify date, time, duration, flare volume, and estimated sulfur emissions per flare event •Determine ground or sea level concentrations of SO_2, upon request	•Representative fuel analysis or exhaust analysis and modeling data or other compliance demonstration •Flare records	None	•SO_2 - BAAQMD Manual of Procedures, Vol.VI, Section 1, Ground Level Monitoring for H_2S and SO_2	
57.1	Rule 57.1	•Annual compliance certification	None	None	None	•Not required based on District analysis
64.B.1	Rule 64.B.1	•Annual compliance certification •None for PUC-quality gas •Annual test for non PUC-quality gas (submit with annual compliance certification)	•Annual fuel gas analysis for non PUC-quality gas	None	•SCAQMD Method 307-94	
64.B.2	Rule 64.B.2	•Annual compliance certification •Fuel supplier's certification, or fuel test per each delivery (submit with annual compliance certification)	•Fuel supplier's certification, or fuel test per each delivery	None	•ASTM Method D4294-83 or D2622-87	
74.6	Rule 74.6	•Annual compliance certification •Maintain current solvent information •Upon request, solvent testing	•Records of current solvent information	None	•ROC content-EPA Test Method 24 or 24A •Identity of solvent components-ASTM E168-67, ASTM E169-87, or ASTM E260-85 •True vapor pressure or composite partial pressure -ASTM D2879-86 •Initial boiling point-ASTM 1078-78 or published source •Spray gun active/passive solvent losses-SCAQMD Method (10-3-89)	

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

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
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 future 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 •Visual inspections of abrasive blasting operation •Abrasive blasting records	•Abrasive blasting records	None	•Visible emission evaluation-Section 92400 of CCR	
74.2	Rule 74.2	•Annual compliance certification •Maintain VOC records of coatings used	•Maintain VOC records of coatings used	None	•VOC content-EPA Method 24, CARB Method 432 • Acid content-ASTM Method D 1613-85, •Metal content-SCAQMD Method 311-91	
40CFR.61.M	40 CFR Part 60, 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 "4" under Rule 71.1 is associated with Attachment 71.1N4 in Section No. 6.

Permit specific conditions are identified with a "PC" followed by a number in the column labeled "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
Part 70 Permit No. 01494
Permitted Equipment and Applicable Requirements

Equipment	71.1	74.9	Engine ATCM	RICE MACT	Additional Requirements
OCS Platform Gail					
1 - 200 BBL PWT (T-06) HC-free; Water service only	4				
1 - 40 BBL Oil Skim Tank (T-22) HC-free; Water service only	4				
1 - 85 BBL Sump Tank (T-3) HC-free; Water service only	4				
1 - 51 BBL Production Drain Tank (V-42) HC-free; Water service only	4				
1 - 7.07 Sqft Deck Drain Pit (T-21) Containment Berm-Exempt HC-free; Water service only					PC3
1 - 545 BHP Caterpillar Diesel Engine, equipped with a Johnson Matthey CXX8 2-Way Diesel Oxidation Catalyst (DOC) for control of CO emissions; and a HILCO Fumes Disposal System Model CATOME-30820032 (South Crane)		9	3	6	PC1
1 - 215 BHP Diesel Engine (North Crane)		9	3	4	PC1
1 - 481 BHP Caterpillar Diesel Emergency Standby Engine, Model 3408 DITA, Serial No. 67U10240, I.D. P-18, used for fire suppression		7	3	3	PC1
Crew Boat Engines					
Permittee is required to maintain a list of boats and engines					PC1
Work Boat Engines					
Permittee is required to maintain a list of boats and engines					PC1

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TITLE V EQUIPMENT LIST DESCRIPTION KEY

For Title V permits, the Permitted Equipment and Applicable Requirements Table contains a number of terms, abbreviations, and acronyms that have been standardized for oilfield facilities. The following list describes many of the terms on an oilfield equipment list:

BHP The output of an internal combustion engine as measured in brake horsepower.

BL A crude oil loading facility that is equipped with bottom loading capabilities.

Condensate Tank A tank that is used for the purpose of storing water and hydrocarbon liquids recovered from natural gas scrubbers. This tank is assumed to operate with a variable liquid level and has an associated throughput limit.

COST A crude oil storage tank that generally operates with a variable liquid level and has an associated throughput limit. An oil shipping tank that has a truck loading rack is a COST by definition. These tanks may also be known as shipping tanks.

Cover Indicates that a petroleum sump, pit, or pond is equipped with a properly installed and maintained cover which complies with Rule 71.4.

EXEMPT A tank, pit, or sump that processes produced water with an ROC content of less than 5 milligrams per liter and is exempt from Rule 71.1 or Rule 71.4.

Gauge or Test Tank A tank that is used for the purpose of production testing a well or group of wells. This tank is assumed to operate with a variable liquid level and has an associated throughput limit.

LACT Tank A Lease Automated Custody Transfer tank that operates at a constant or near constant liquid level and does not have an associated throughput limit. This tank is generally equipped with a LACT pump for pipeline oil shipping. A shipping tank with a truck loading rack is not by definition a LACT tank, but is a COST.

Loading Facility A crude oil loading rack or loading valve used for the transfer of crude oil from a storage tank or group of tanks to a delivery vessel.

Lo-NOx Device has equipment to control the emissions of NOx and CO to meet the requirements of Rules 74.15 or 74.15.1, or best available control technology requirements.

MMBTU/Hr The heat input of an external combustion device as measured in millions of British Thermal Units per hour.

NG Indicates that the equipment is permitted to be fired on natural gas only.

NG/FO Indicates that equipment is permitted to be fired on natural gas with fuel oil or diesel as a backup fuel.

NSCR Engine that is equipped with non-selective catalytic reduction to meet its Rule 74.9 compliance requirements.

Pit Device used to receive emergency or intermittent flows.

PSC Engine that is equipped with a pre-stratified charge to meet its Rule 74.9 compliance requirements.

PWT A produced water tank that generally operates with a constant liquid level and does not have an associated throughput limit. These tanks may also be known as free water knock out (FWKO) tanks.

Rich Burn or Lean Burn A designation associated with a gas-fired internal combustion engine that determines its Rule 74.9 compliance requirements.

SCR Engine or turbine that is equipped with selective catalytic reduction and ammonia injection to meet its Rule 74.9 or Rule 74.23 compliance requirements.

SF A crude oil loading facility that is equipped with submerged fill loading capabilities.

Sump Device used for separation, generally in constant use.

UNC Indicates that the equipment is uncontrolled. For example, a tank that is not equipped with a vapor recovery system, or an engine or heater that is not equipped with NOx controls are labeled UNC.

VR A vapor recovery system that is installed on a tank, loading rack or loading facility, glycol dehydrator, or other piece of process equipment.

Wash Tank A tank that stores and separates oil and water that generally operates with a constant liquid level. It does not have an associated throughput limit.

TITLE V APPLICABLE REQUIREMENT CODE KEY

Rule 71.1, "Crude Oil Production and Separation"

1. Storage tanks shall be equipped with a vapor recovery system that directs all vapors to a gas gathering system or flare (71.1.B.1.a)
2. Storage tanks shall be equipped with a vapor recovery system that directs all vapors to some other control system with a minimum destruction or removal efficiency of 95% by weight (71.1.B.1.b)
3. Tank batteries installed prior to June 20, 1978 are exempt from vapor recovery when processing crude oil having a modified Reid vapor pressure of less than 0.5 psia. Solid roof and pressure-vacuum relief valve is required. (71.1.B.2/71.1.D.1.a)
4. Storage tanks are exempt from the solid roof and vapor recovery requirements if the ROC content of the liquid entering the tank is less than 5 milligrams per liter. (71.1.D.3)
5. Storage tanks are exempt from the solid roof and vapor recovery requirements if a BACT Cost Analysis indicates that maximum emission reduction has already taken place. (71.1.D.4)
6. Portable tanks shall be equipped with closed covers and pressure vacuum valves and have limited exemptions from vapor recovery requirements. (71.1.B.3/71.1.D.1.c)

Rule 74.9, "Stationary Internal Combustion Engines"

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

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.

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 ≤ 300 HP – area source
5. Existing non-emergency diesel engines 300 HP < X ≤ 500 HP – area source
6. Existing non-emergency diesel engines > 500 HP – area source
7. Existing non-emergency spark-ignited four stroke remote rich burn 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
10. Existing non-emergency spark-ignited four-stroke lean-burn engine > 500 HP – area source
11. Existing non-emergency spark-ignited 4SRB engine ≤ 500 HP

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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.

The "Calculation Procedure" column is reserved for future use. Emission calculations for the emissions units in this table are available in the District's permit files for this stationary source.

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 ROC/Yr: pounds of reactive organic compounds per year
LPG: liquid petroleum gas (propane)
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
Part 70 Permit No. 01494
Permitted Throughput/Consumption Limits

Equipment	Throughput Permit Limit	District (D)/ Federal(F) Enforceable	Calculation Throughput
OCS Platform Gail			
1 - 200 BBL PWT (T-06) HC-free; Water service only 1 - 40 BBL Oil Skim Tank (T-22) HC-free; Water service only 1 - 85 BBL Sump Tank (T-3) HC-free; Water service only 1 - 51 BBL Production Drain Tank (V-42) HC-free; Water service only 1 - 7.07 Sqft Deck Drain Pit (T-21) Containment Berm-Exempt HC-free; Water service only			
1 - 545 BHP Caterpillar Diesel Engine, equipped with a Johnson Matthey CXX8 2-Way Diesel Oxidation Catalyst (DOC) for control of CO emissions; and a HILCO Fumes Disposal System Model CATOME-30820032 (South Crane)	21,339 Gal/Yr	F	21,339 Gal/Yr
1 - 215 BHP Diesel Engine (North Crane)	++		++
1 - 481 BHP Caterpillar Diesel Emergency Standby Engine, Model 3408 DITA, Serial No. 67U10240, I.D. P-18, used for fire suppression	50 Hr/Yr [1]	D	50 Hr/Yr
Crew Boat Engines			
Permittee is required to maintain a list of boats and engines	353,100 Gal/Yr	F	53.1 Mgal/Yr
Work Boat Engines			
Permittee is required to maintain a list of boats and engines	++	F	300,000 Gal/yr

Notes:
1 - 50 Hours per year is for maintenance purposes. Emergency use is unlimited.
++ - Included in Limit Above

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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
Part 70 Permit No. 01494
Permitted Emissions

Equipment	TONS PER YEAR					POUNDS PER HOUR				
	ROC	NOx	PM	SOx	CO	ROC	NOx	PM	SOx	CO
OCS Platform Gail										
1 - 200 BBL PWT (T-06)	<0.01					<0.01				
HC-free; Water service only										
1 - 40 BBL Oil Skim Tank (T-22)	<0.01					<0.01				
HC-free; Water service only										
1 - 85 BBL Sump Tank (T-3)	<0.01					<0.01				
HC-free; Water service only										
1 - 51 BBL Production Drain Tank (V-42)										
HC-free; Water service only										
1 - 7.07 Sqft Deck Drain Pit (T-21) Containment Berm-Exempt										
HC-free; Water service only										
1 - 545 BHP Caterpillar Diesel Engine, equipped with a Johnson Matthey CXX8 2-Way Diesel Oxidation Catalyst (DOC) for control of CO emissions; and a HILCO Fumes Disposal System Model CATOME-30820032 (South Crane)	0.35	4.99	0.36	0.08	1.09	1.28	18.15	1.30	0.29	0.30
1 - 215 BHP Diesel Engine (North Crane)	*	*	*	*	*	0.50	7.13	0.51	0.11	1.55
1 - 481 BHP Caterpillar Diesel Emergency Standby Engine, Model 3408 DITA, Serial No. 67U10240, I.D. P-18, used for fire suppression	0.03	0.40	0.03	0.01	0.09	0.28	4.00	0.29	0.06	0.87
Crew Boat Engines										
Permittee is required to maintain a list of boats and engines										
Tons Per Year Permitted Emissions based on 53,100 gallons per year	0.34	6.42	0.31	0.20	3.05	4.10	77.84	3.70	2.41	36.97
Pounds Per Hour Permitted Emissions based on two crew boats with	*	*	*	*	*	0.14	2.75	0.13	0.09	1.30
4-567 BHP engines and 2 - 40 BHP engines (Total is 4696 BHP)										
Work Boat Engines										
Permittee is required to maintain a list of boats and engines										
Tons Per Year Permitted Emissions based on 300,000 gallons per year	1.91	36.29	1.72	1.13	17.24	6.50	123.56	5.87	3.06	58.69
Pounds Per Hour Permitted Emissions based on a single workboat with	*	*	*	*	*	0.39	7.38	0.35	0.23	3.51
4 - 1800 BHP main engines, 2 - 215 BHP gen engines,	*	*	*	*	*	0.23	4.29	0.20	0.13	2.04
1 - 250 BHP thruster engine	*	*	*	*	*					
(Total is 7,880 BHP)	*	*	*	*	*					
* - Included in Emissions Above										
** - Allison Turbine Generators are Worst Case										
+ - Back-up Generator is Worst Case										
Total Permitted Emissions	2.63	48.10	2.42	1.42	21.47	13.42	245.10	12.35	6.38	105.23

HAP Emissions Ref.: OCS HAP Emission Estimation Techniques and Calculations are included in Re-issuance Application and Maintained at the Facility.

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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.

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Ventura County Air Pollution Control District

INSIGNIFICANT ACTIVITIES (EXEMPT EQUIPMENT)

Part 70 Permit No. 01494

INSIGNIFICANT ACTIVITIES (EXEMPT EMISSION UNITS)	BASIS FOR EXEMPTION (Size/Production Rate)	RULE 23 CITATION
Wipe Cleaning Operation	ROC content $\leq$ 25 g/l	23.F.10.b
49 BHP Perkins Model 404D-22TAG Diesel Standby Generator for Backup Electricity to Solar Power	Maximum design rating < 50 BHP	23.D.6

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, 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 71.1.B.1.a Applicable Requirements
Tanks Exempt from Vapor Recovery
Tanks Exempt From Roof and Pressure-Vacuum Relief Valve
Low ROC Content Exemption

Rule 71.1, "Crude Oil Production and Separation"
Adopted 06/16/1992, Federally Enforceable
Adopted 07/11/2023, District Enforceable

This permit attachment lists the requirements of the July 11, 2023, version of Rule 71.1. Compliance with this attachment will ensure compliance with both versions of Rule 71.1. The permit conditions below, therefore, are federally enforceable. The District-enforceable version of this rule will become federally enforceable when approved by the EPA as part of the SIP.

Rule 74.10, "Components at Crude Oil and Natural Gas Production and Production Facilities, Pipeline Transfer Stations and Natural Gas Production, Storage and Processing Facilities"
Adopted 03/10/1998, Federally Enforceable
Adopted 12/12/2023, District Enforceable

This permit attachment lists the requirements of the December 12, 2023, version of the rule. Compliance with this attachment will ensure compliance with both versions of Rule 74.10. The permit conditions below, therefore, are federally enforceable. The District-enforceable version of this rule will become federally enforceable when approved by the EPA as part of the SIP.

Applicability:

This attachment applies to tanks at this stationary that are exempt from the vapor recovery requirements of Section B.1 of Rule 71.1, and the solid roof and pressure-vacuum relief valve requirement of Section B.2 of Rule 71.1, pursuant to the exemption of Rule 71.1.D.3. The exemption states that vapor recovery, a solid roof, sealed hatches, and a pressure-vacuum relief valve are not required if the ROC content of the liquid entering the tank is less than 5 milligrams per liter. Specifically, this attachment applies to all storage tanks in a tank battery, including wash tanks, produced water tanks, and wastewater separators which meet the above exemption and are used in the production, gathering, storage, processing, and separation of crude oil and natural gas from any petroleum production permit unit prior to custody transfer. This attachment does not apply to portable tanks or other tanks not equipped with vapor recovery.

A tank is defined as a container, constructed primarily of nonearthen materials, used for the purpose of storing or holding petroleum material, or for the purpose of separating water and/or gas from petroleum material. A tank battery is defined as any tank or aggregation of tanks. An

aggregation of tanks is considered a tank battery only if the tanks are located so that no one tank is more than 150 feet from any other tank, edge to edge.

The tank's hatches and other inlet and outlet liquid and gas piping connections are considered to be components subject to the leak requirements of APCD Rule 74.10, " Components at Crude Oil and Natural Gas Production and Production Facilities, Pipeline Transfer Stations and Natural Gas Production, Storage and Processing Facilities."

Conditions:

1. Pursuant to Rule 71.1.D.3, the ROC content of liquid entering a tank shall not exceed 5 milligrams per liter.

2. The tank's hatches and other inlet and outlet gas and liquid piping connections are components subject to the leak requirements of Rule 74.10, " Components at Crude Oil and Natural Gas Production and Production Facilities, Pipeline Transfer Stations and Natural Gas Production, Storage and Processing Facilities."

3. Under the authority of Rule 71.1.E.2, the District shall require any person claiming an exemption pursuant to Rule 71.1.D.3 to validate the exemption for each tank on an annual basis. Records of such validation shall be maintained at the facility, and shall be submitted to the District, in writing, with the annual compliance certification, and shall include the results of an independent laboratory analysis.

   Pursuant to Rule 71.1.F.3, the ROC content of crude oil in milligrams per liter shall be determined by EPA Method 8015D Nonhalogenated Organics Using GC/FID. Samples will be analyzed using purge and trap (EPA Method 5030C Purge and Trap for Aqueous Samples), and stock standards will be prepared from gasoline. Sampling shall occur at the entry point of the device.

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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 74.9.D.9 Applicable Requirements
Stationary Diesel-Fired Internal Combustion Engines
Used to Power Cranes and Welding Equipment

Rule 74.9, "Stationary Internal Combustion Engines"
Adopted 11/08/2005, Federally Enforceable

Applicability:

This attachment describes the requirements of APCD Rule 74.9, "Stationary Internal Combustion Engines," and applies to stationary diesel-fired internal combustion engines rated at 50 or more horsepower, and not subject to the provisions of APCD Rule 74.16, "Oilfield Drilling Operations."

As detailed in Rule 74.9.D.9, stationary diesel-fired internal combustion engines used to power cranes and welding equipment are exempt from Sections B, C, and E of Rule 74.9.

Specifically, this attachment applies to diesel engines that are exempt because they are used to power cranes and welding equipment.

Conditions:

1. Pursuant to Rule 74.9.D.9, the provisions of Section B (Requirements), Section C (Engine Operator Inspection Plan), and Section E (Recordkeeping Requirements) of Rule 74.9 shall not apply to stationary internal combustion diesel engines used to power cranes and welding equipment.

2. The engine shall only be used to power a crane or welding equipment.

3. The operator shall maintain data for each engine including the function (usage) of the engine, manufacturer, model number, operator identification number, and location of each engine.

4. Permittee shall perform daily visual inspections of the diesel-fired engine to ensure that compliance with Rule 74.9.D.9 is being maintained.

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Ventura County Air Pollution Control District
California Airborne Toxic Control Measure For
Stationary Compression Ignition Engines
Engines Used Solely on OCS Platforms

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 stationary diesel-fueled CI engines that are operated solely on OCS Platforms. Section 93115.3(h) of the ATCM exempts such engines from the operating requirements and emission standards for new and in-use engines as listed in Sections 93115.6 and 93115.7 of the ATCM. 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), the permittee shall keep records and prepare a monthly summary that shall list and document the nature of use for each of the following:

a. Emergency use hours of operation;
b. Maintenance and testing hours of operation;
c. Type of 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)
RICE MACT Last Revised 08/10/22

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 be used for other limited purposes as specified in Section 63.6640(f)(4). Stationary RICE used for peak shaving or as part of a financial arrangement to supply power into the grid, or as a part of a non-emergency demand response program are not considered emergency stationary RICE.

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

Conditions:

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

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

    b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes

first, and replace as necessary.

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

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

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

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

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

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

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

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

   c. The emergency stationary RICE may be operated up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided above. The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response to generate income for a facility. The 50 hours per year for non-emergency situations can be

used to supply power as part of a financial agreement with another entity if all of the requirements of Section 63.6640(f)(4)(ii)(A–E) are met. The 50 hours per year limit is to be counted towards the 100 hours per year limit.

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

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

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

7. If the 50 hours per year for non-emergency situations are used to supply power as part of a financial agreement with another entity and the requirements of Section 63.6640(f)(4)(ii) are met, then 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 operated as part of a financial agreement with another entity and the requirements of Section 63.6640(f)(4)(ii) are met, then 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).

Ventura County Air Pollution Control District
National Emission Standards for Hazardous Air Pollutants
for Stationary Reciprocating Internal Combustion Engines
Existing Non-Emergency Diesel Engines ≤ 300 HP 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 non-emergency diesel engines rated at less than or equal to 300 HP (horsepower) 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.

A non-emergency engine is any engine whose operation does not meet the definition of an "emergency engine" as defined in Section 63.6675. Pursuant to 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. 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 demand response program are not considered emergency stationary RICE.

Pursuant to Section 63.6595(a)(1), the permittee must comply with the applicable operating requirements no later than May 3, 2013.

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 1,000 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.

2. Pursuant to Section 63.6604, the permittee shall use diesel fuel that meets the requirements in 40 CFR 80.510(b) for nonroad diesel.

3. 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.

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 Section 63.6655(e), the permittee shall maintain records of the maintenance conducted on the stationary RICE.

6. 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).

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Ventura County Air Pollution Control District
National Emission Standards for Hazardous Air Pollutants
for Stationary Reciprocating Internal Combustion Engines
Existing Non-Emergency Diesel Engines > 500 HP 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 non-emergency diesel engines rated at greater than 500 HP (horsepower) 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.

A non-emergency engine is any engine whose operation does not meet the definition of an "emergency engine" as defined in Section 63.6675. Pursuant to 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. 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 demand response program are not considered emergency stationary RICE.

Pursuant to Section 63.6595(a)(1), the permittee must comply with the applicable operating requirements no later than May 3, 2013.

Conditions:

1. Pursuant to Section 63.6603(a), Table 2d, and Section 63.6625(h), during periods of startup, the permittee shall minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations listed in the conditions below apply.

2. Pursuant to Section 63.6603(a), Table 2d, the permittee shall comply with the following operating requirements for non-emergency, non-black start (i.e., black start means to only

start up a combustion turbine) CI stationary RICE > 500 HP, except during periods of startup:

a. Limit concentration of CO in the stationary RICE exhaust to 23 ppmvd at 15 percent O2; or

b. Reduce CO emissions by 70 percent or more.

3. Pursuant to Section 63.6603(a), Table 2b, if an oxidation catalyst is installed to meet the above requirements, the permittee shall maintain the catalyst so that the pressure drop across the catalyst stays within the required range and the engine exhaust temperature at the catalyst inlet stays within the required range. If the engine is not equipped with an oxidation catalyst, then the permittee shall comply with operating limitations approved after the unit has achieved compliance with the emissions limits. Prior to installing an oxidation catalyst, the permittee shall apply for, and obtain, an APCD Authority to Construct.

4. Pursuant to Section 63.6604, the permittee shall use diesel fuel that meets the requirements in 40 CFR 80.510(b) for nonroad diesel.

5. Pursuant to Sections 63.6612 and 63.6630, the permittee has conducted initial performance tests according to Tables 4 and 5.

6. Pursuant to Section 63.6615 and Table 3, the permittee shall conduct subsequent performance tests every 8,760 hours of operation or every three years, whichever comes first. Testing shall be conducted as stipulated in Section 63.6620 and Table 4 which requires EPA Method 10 for meeting the CO ppmvd limit.

7. The unit is equipped with a CPMS (Continuous Parameter Monitoring System). Pursuant to Section 63.6625, the permittee shall comply with the monitoring requirements of Section 63.6625(a) or 63.6625(b).

8. The unit is equipped with a HILCO Fumes Disposal System for oil mist elimination and recovery, Model CATOME-30820032. This unit meets the requirements of an open crankcase filtration system as required by Section 63.6625(g)(2).

9. Pursuant to Section 63.6650 and Table 7, the permittee shall submit semiannual compliance reports. The compliance report shall contain the information specified in Sections 63.6650(c)(1) through (6).

10. Pursuant to Section 63.6655, the permittee shall maintain all applicable records described in Sections 63.6655(a)(1) through (a)(5) and (b)(1) through (b)(3).

11. 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).

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7. PERMIT SPECIFIC CONDITIONS (ATTACHMENTS)

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

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

Ventura County Air Pollution Control District
Additional Permit Requirements
Platform Gail Additional Requirements

Rule 26, "New Source Review"

Rule 29, "Conditions on Permits"

For OCS sources, conditions applied pursuant to Rule 26 or Rule 29 are federally enforceable.

Applicability:

This attachment applies to Platform Gail. 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 29)

2. All diesel fuel consumed in the crane engines, backup generator engine, and in the boats shall contain 0.05% sulfur by weight, or less. In order to comply with this condition, permittee shall maintain fuel records, or certification from the fuel supplier, documenting the sulfur content of each diesel fuel delivery. (Rule 29)

3. The total diesel fuel consumption by all crew boat and work boat engines servicing Platform Gail shall not exceed 353,100 gallons per year. As part of the decommissioning process, the annual diesel fuel consumption in excess of 167,100 gallons was permitted without offsetting the emission increase pursuant to California Health and Safety Code Section 42301.13 (Olberg).

   In order to comply with this condition, the permittee shall maintain monthly records of diesel fuel consumption for all crew boat and work boat engines servicing OCS Platforms Gail and Grace. Boats not owned by the permittee that are providing emergency oil spill response or training shall not be included in these records. The fuel usage, in gallons, shall be allocated 35% to Platform Grace and 65% to Platform Gail. The total fuel usage for all crew boat and work boat engines servicing both platforms shall be summed for the

previous twelve months. Sixty five percent of the total fuel usage from the crew and work boat engines servicing both platforms shall not exceed the above limit over any of these twelve month periods.

4. Crew boat and work boat engine Permitted Emissions for Platform Gail are based on the annual limit of 353,100 gallons diesel fuel per year and the worst case U.S. EPA Tier 2 Marine Engine Standards as found in Table 2 of the California Air Toxic Control Measure For Diesel Engines On Commercial Harbor Craft Operated Within California Waters And 24 Nautical Miles Of The California Baseline. These emission standards are: 8.2 g NOx+HC/BHP-hr; 0.37 g PM/BHP-hr; and 3.7 g CO/BHP-hr. This ATCM is not federally enforceable and is not implemented by the VCAPCD. 40 CFR Part 55, "Outer Continental Shelf Air Regulations," does not provide the VCAPCD the authority to control emissions from the vessels that service the platform, but does require that the vessel emissions be included in the permitted emissions for the OCS source.

5. As shown in Table No. 4, this permit allows the simultaneous use of up to two Crew Boats with combined engine horsepower up to 4,696 brake horsepower. No more than two Crew Boats shall be used for servicing Platform Gail at any one time. The permittee shall maintain a log showing the days and hours that each crew boat is in service to Platform Gail. The permittee shall maintain a log of all Crew Boats that may be used for servicing Platform Gail. The log shall include the boat name and a list of all engines on board, including the engines' make, model, and brake horsepower. (Rule 29)

6. As shown in Table No. 4, this permit allows the use of a Work Boat with combined engine horsepower up to 7,880 brake horsepower. Only one Work Boat at a time shall be used for servicing Platform Gail. The permittee shall maintain a log showing the days and hours that each work boat is in service to Platform Gail. The permittee shall maintain a log of all Work Boats that may be used for servicing Platform Gail. The log shall include the boat name and a list of all engines on board, including the engines' make, model, and brake horsepower. (Rule 29)

7. For solvent cleaning activities, including wipe cleaning, permittee shall maintain monthly records of solvent purchase and usage along with records of solvent that is recycled or disposed of properly.

   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.10, the use of cleaning agents that contain two percent or less organic solvent, by weight, as used or applied (Rule 23.F.10.a) and the use of nonrefillable aerosol cleaning products (Rule 23.F.10.b), is also exempt from permit. Materials exempted

from permit pursuant to Rule 23.F.7, Rule 23.F.10.a, and Rule 23.F.10.b do not need to be included in the monthly records.

The monthly records shall be summed for the previous 12 months. Net solvent usage totals for any of these 12 calendar month rolling periods in excess of the Rule 23.F.10.d exemption shall be considered a violation of this permit.

This permit does not limit the usage of acetone. Acetone is exempt from permit and record keeping requirements, as it is not defined as a reactive organic compound. (Rule 29)

Ventura County Air Pollution Control District
Additional Permit Requirements
7.07 Sqft Deck Drain Pit (T-21)

Rule 29, "Conditions on Permits"

Rule 71.4, "Petroleum Sumps, Pits, Ponds, and Well Cellars"
Adopted 06/08/93, Federally-Enforceable

For OCS sources, conditions applied pursuant to Rule 29 are federally enforceable.

Applicability:

This attachment serves to address the additional requirement that applies to the 7.07 square foot Deck Drain Pit (T-21) located on Platform Gail. This requirement is in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. The 7.07 sqft Deck Drain Pit (T-21) is exempt from permit and APCD Rule 71.4, "Petroleum Sumps, Pits, Ponds, and Well Cellars", because the function of the pit is to act as a containment berm. Pursuant to the definitions in APCD Rule 71, "Crude Oil and Reactive Organic Compound Liquids", a containment berm shall not be considered a pit. (Rules 29 and 71.4)

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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.B.1 Applicable Requirements
Sulfur Compounds - Sulfur Emissions at Point of Discharge - OCS

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

Applicability:

This attachment applies to all emissions units at this OCS (Outer Continental Shelf) stationary source that emit sulfur compounds. This attachment addresses the requirements of Rule 54.B.1 for sulfur emissions at the point of discharge and includes the exemptions of Rule 54 for the unplanned burning of gas for emergency or safety concerns and for the planned burning of gas.

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% oxygen	For sources subject to: Rule 74.9, "Stationary Internal Combustion Engines" Rule 74.23, "Stationary Gas Turbines" Flares and all other combustion operations

2. Pursuant to Rule 54.B.1.b, no person shall discharge sulfur compounds, which would exist as a liquid or gas at standard conditions, in excess of 500 ppm by volume from any other operation, calculated as sulfur dioxide (SO_2) by volume at the point of discharge.

3. Pursuant to Rule 54.C.1 and 54.C.2, the sulfur dioxide emission limitations of Rule 54.B.1 do not apply to the unplanned burning of gas for emergency or safety concerns, or to the planned burning of gas, provided that all the conditions and requirements of Rule 54.C.1 for unplanned flaring, and Rule 54.C.2 for planned flaring events, have been met. For unplanned flaring, Rule 54.C.1 requires notification, recordkeeping, and reporting as detailed below. For planned flaring events, Rule 54.C.2 requires notification, a planned

flaring management plan, recordkeeping, excess emissions fees, and reporting as detailed below.

4. Pursuant to Rule 54.C.1, the sulfur dioxide emission limitations of Rule 54.B.1 do not apply to the unplanned burning of gas for emergency or safety concerns provided all of the conditions of Rule 54.C.1 have been met. These include, but are not limited to, the following conditions:

    a. Permittee shall maintain records or logs of each flaring event as required by Rule 54.C.1.d.

    b. Pursuant to Rule 54.C.1.f, the unplanned flaring event shall not exceed 24 hours in duration. If the flaring event exceeds one hour in duration, the operator shall:

        1. Notify the District Compliance Division as soon as reasonably possible, but no later than four hours after its detection by the operator.

        2. Within one week after the flaring event, submit a written report to the District Compliance Division which contains the records required by Rule 54.C.1.d, an estimate of the sulfur emissions, and pictures or descriptions of the equipment or controls that failed.

5. Pursuant to Rule 54.C.2, the sulfur dioxide emission limitations of Rule 54.B.1 do not apply to the planned burning of gas provided all of the conditions of Rule 54.C.2 have been met. These include, but are not limited to, the following conditions:

    a. Permittee shall provide a 72 hour written notification to the District Compliance Division as required by Rule 54.C.2.a.

    b. Permittee shall have a planned flare management plan in place and approved by the District Compliance Division as required by Rule 54.C.2.b.

    c. Permittee shall maintain records of the date, time, duration, flare volume and estimated sulfur emissions (as pounds of SO_2) during the entire flaring event as required by Rule 54.C.2.c.

    d. Pursuant to Rule 54.C.2.d, permittee shall notify the District Compliance Division in writing when work is completed. The notice shall include all updated information from the 72 hour notification as detailed in Rule 54.C.2.a.

    e. Pursuant to Rule 54.C.2.f, permittee shall provide a written report of excess emissions to the District Compliance Division no later than 15 days after the end

of each calendar year. Permittee shall pay a fee pursuant to APCD Rule 42.N for any excess emissions of SO_2.

6. Permittee shall maintain a representative fuel analysis or exhaust analysis to ensure that compliance with Rule 54.B.1 is being maintained. This analysis shall be provided to the District upon request.

7. 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.

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Ventura County Air Pollution Control District
Rule 54.B.2 Applicable Requirements
Sulfur Compounds - Sulfur Dioxide Concentration at Ground Level - OCS

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

Applicability:

This attachment applies to all emissions units at this OCS (Outer Continental Shelf) stationary source that emit sulfur compounds. This attachment addresses the requirements of Rule 54.B.2 for sulfur emissions at ground or sea level at or beyond the property line of the stationary source and includes the exemptions of Rule 54 for the unplanned burning of gas for emergency or safety concerns and for the planned burning of gas.

Conditions:

1. Pursuant to Rule 54.B.2, 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. Pursuant to Rule 54.C.1 and 54.C.2, the sulfur dioxide emission limitations of Rule 54.B.2 do not apply to the unplanned burning of gas for emergency or safety concerns, or to the planned burning of gas, provided that all the conditions and requirements of Rule 54.C.1 for unplanned flaring, and Rule 54.C.2 for planned flaring events, have been met. For unplanned flaring, Rule 54.C.1 requires notification, recordkeeping, and reporting as detailed below. For planned flaring events, Rule 54.C.2 requires notification, a planned flaring management plan, recordkeeping, excess emissions fees, and reporting as detailed below.

4. Pursuant to Rule 54.C.1, the sulfur dioxide emission limitations of Rule 54.B.2 do not apply to the unplanned burning of gas for emergency or safety concerns provided all of the conditions of Rule 54.C.1 have been met. These include, but are not limited to, the following conditions:

a. Permittee shall maintain records or logs of each flaring event as required by Rule 54.C.1.d.

b. Pursuant to Rule 54.C.1.f, the unplanned flaring event shall not exceed 24 hours in duration. If the flaring event exceeds one hour in duration, the operator shall:

1. Notify the District Compliance Division as soon as reasonably possible, but no later than four hours after its detection by the operator.

2. Within one week after the flaring event, submit a written report to the District Compliance Division which contains the records required by Rule 54.C.1.d, an estimate of the sulfur emissions, and pictures or descriptions of the equipment or controls that failed.

5. Pursuant to Rule 54.C.2, the sulfur dioxide emission limitations of Rule 54.B.2 do not apply to the planned burning of gas provided all of the conditions of Rule 54.C.2 have been met. These include, but are not limited to, the following conditions:

a. Permittee shall provide a 72 hour written notification to the District Compliance Division as required by Rule 54.C.2.a.

b. Permittee shall have a planned flare management plan in place and approved by the District Compliance Division as required by Rule 54.C.2.b.

c. Permittee shall maintain records of the date, time, duration, flare volume and estimated sulfur emissions (as pounds of SO_2) during the entire flaring event as required by Rule 54.C.2.c.

d. Pursuant to Rule 54.C.2.d, permittee shall notify the District Compliance Division in writing when work is completed. The notice shall include all updated information from the 72 hour notification as detailed in Rule 54.C.2.a.

e. Pursuant to Rule 54.C.2.f, permittee shall provide a written report of excess emissions to the District Compliance Division no later than 15 days after the end of each calendar year. Permittee shall pay a fee pursuant to APCD Rule 42.N for any excess emissions of SO_2.

6. Permittee shall maintain a representative fuel analysis or exhaust analysis, along with modeling data or other demonstration to ensure that compliance with Rule 54.B.2 is being maintained. This analysis and compliance demonstration shall be provided to the District upon request.

7. Upon District request, pursuant to Rule 54.D.2, 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.

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

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

Applicability:

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

Conditions:

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

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

2. Upon request of the District Compliance Division, compliance shall be determined by independent source test using CARB Method 5. The total particulate catch shall include the filter catch, probe catch, impinger catch, and the solvent extract, as specified in CARB Method 5. Any other appropriate test method may be used with prior written approval by the District, the California Air Resources Board, and the U.S. Environmental Protection Agency.

3. Periodic monitoring is not necessary to certify compliance with Rule 57.1. To certify compliance, a reference to the Rule 57.B District analysis dated December 3, 1997 is sufficient.

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

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

Applicability:

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

Conditions:

1. Pursuant to Rule 64, no person shall burn at any time gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel (788 ppmv), calculated as hydrogen sulfide at standard conditions, unless specifically exempted by Rule 64.

2. If only Public Utilities Commission-regulated natural gas, propane, or butane is combusted at this facility, it will be assumed that the permittee is complying with Rule 64 without additional periodic monitoring requirements. Any person claiming this exemption shall maintain records sufficient to substantiate the use of these fuels.

3. If other than Public Utilities Commission-regulated natural gas, propane, or butane is being combusted, the permittee shall analyze the sulfur content of the fuel on an annual basis using South Coast AQMD Method 307-94 - Determination of Sulfur in a Gaseous Matrix or by ASTM D1072-90 (1994), Standard Test Method for Total Sulfur in Fuel Gases.

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

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

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

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

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

   b. A stationary source is new.

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

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

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

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

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

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Ventura County Air Pollution Control District
Rule 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 11/10/2020, 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 25 grams per liter, as applied.

b. Solvents used for cleaning of electronic components, electrical apparatus, or aerospace components conducted in a degreaser shall not exceed an ROC content of 100 grams per liter, as applied.

c. Solvents used for cleaning of medical devices and pharmaceuticals, including repair and maintenance of tools, equipment and machinery shall not exceed an ROC content of 800 grams per liter, as applied.

d. Solvents used for the general work surface cleaning of medical devices and pharmaceuticals shall not exceed an ROC content of 600 grams per liter, as applied.

e. Solvents used for cleaning for purposes other than those listed in (a) through (d) 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 properly. Spent cleanup solvents may be classified as hazardous waste. The owner or operator shall obtain approval from applicable local, state, or federal water pollution control agency prior to disposing of spent solvents into the sewer or storm drain systems.

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. 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

f. Stripping of cured coating (e.g.; stripping), cured adhesive (e.g.; debonding, ungluing), cured ink, or cured resin.

g. 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. 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). The ROC content of materials containing 50 g/l of ROC or less shall be determined by the most recent version of South Coast Air Quality Management District (SCAQMD) Method 313 (Determination of Volatile Organic Compounds by Gas Chromatography/Mass Spectrometry) or any other alternative test methods approved by the U.S. EPA, CARB, and the District.

    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. Rule 74.6.G.5, on or before December 31, 2021, 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"
Federally Enforceable Version Adopted 11/20/2020

Applicability:

This attachment applies to short term activities involving any person who markets, 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, to fields or lawns, 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 (as stipulated in Rule 74.2.F.2); do not apply to any aerosol coating product; and do not apply to colorants added at the factory or at the worksite (as stipulated in Rule 74.2.F.3).

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 50 grams per liter of coating.

    c. The VOC content of nonflat-high gloss coatings shall not exceed 50 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 default coatings shall not exceed 50 grams per liter of coating. A default coating is any specialty coating (those other than flat or nonflat coatings) that is not defined in Section J of Rule 74.2 as any other coating category.

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

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

3. Pursuant to Rule 74.2.B.4, all architectural coating containers used to apply the contents therein to a surface directly from the container by pouring, siphoning, brushing, rolling, padding, ragging or other means, shall be closed when not in use. These architectural coating containers include, but are not limited to, drums, buckets, cans, pails, trays or other application containers. Containers of any VOC-containing materials used for thinning and cleanup shall also be closed when not in use.

4. Pursuant to Rule 74.2.B.5, no person who applies or solicits the application of any architectural coating shall apply or solicit the application of any coating that is thinned to exceed the applicable VOC limit specified in the Tables in Subsection B.1.

5. Permittee shall monitor each architectural coating operation to ensure that compliance with Rule 74.2 is being maintained. Permittee shall specify the usage of compliant coatings and shall maintain VOC records of coatings used at the stationary source. This information shall be submitted to the District upon request.

6. The VOC content of architectural coatings, along with other specified physical and chemical properties, shall be measured using the testing procedures in Rule 74.2.G.

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Ventura County Air Pollution Control District
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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11. MISCELLANEOUS FEDERAL PROGRAM CONDITIONS

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

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Ventura County Air Pollution Control District
40 CFR Part 55 Applicable Requirements
Outer Continental Shelf Air Regulations

40 CFR Part 55, "Outer Continental Shelf Air Regulations"
Federally-Enforceable

Applicability:

This attachment applies to the stationary source since it is an existing outer continental shelf (OCS) source. 40 CFR Part 55 and related consistency updates detail the District rules that apply to OCS sources. Attachments contained in this permit use the term "Federally-Enforceable OCS Version" to designate those rules that are federally-enforceable at OCS sources via 40 CFR Part 55.

Conditions:

1. Permittee shall comply with 40 CFR Part 55, "Outer Continental Shelf Air Regulations". Permittee shall also comply with Rule 72.1, "Outer Continental Shelf Air Regulations". Rule 72.1 incorporates the following provisions of 40 CFR Part 55:

Section 55.1	Statutory authority and scope
Section 55.2	Definitions
Section 55.3	Applicability
Section 55.4	Requirement to submit a notice of intent
Section 55.5	Corresponding onshore area designation
Section 55.6	Permit requirements
Section 55.7	Exemptions
Section 55.8	Monitoring, reporting, inspections, and compliance
Section 55.9	Enforcement
Section 55.10	Fees
Section 55.13	Federal requirements that apply to OCS sources
Section 55.14 a,b,c	Requirements that apply to OCS sources located within 25 miles of states' seaward boundaries, by state

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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 11/18/16)

Applicability:

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

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

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

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

Conditions:

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

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

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

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

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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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