# INSTRUCTIONS FOR COMPLETING THE TITLE-V ANNUAL COMPLIANCE CERTIFICATION

**What is a Title V Annual Compliance Certification Report?**

A Title-V Annual Compliance Certification Report is a report certifying the sourceôs compliance status with all permit terms and conditions and any other state or federal applicable requirements relevant to the source. It is reporting requirement of the Title-V State Operating Permit, issued by the New Mexico Environment Department Air Quality Bureau. The report must be submitted to NMED and EPA.

**When do I need to submit a TV Semi-Annual Monitoring Report?**

Submittal of the Title-V Annual Compliance Certification Report is required at least every twelve months. The reports shall be due to the department within thirty (30) days of the end of the reporting period, per NMAC 20.2.70.302.E(3). The reporting period is a twelve month period usually beginning and ending on the anniversary date of the first issued operating permit unless otherwise specified in the permit.

**What do I need to submit?**

Submittal requirements for the Title-V Annual Compliance Certification Report are outlined as follows:

***Cover Page***

The cover page for the Title-V Annual Compliance Certification Report is the Reporting Submittal Form. This is a multi-purpose form that is used as a cover page for all reports delivered to the Air Quality Bureau to satisfy permit conditions or regulatory requirements. It can be found on the Air Quality Bureau website at *http://www.nmenv.state.nm.us/aqb/enforce_compliance/compliance.html* Be sure to check Section II Box A of the Reporting Submittal Form when submitting Title-V Annual Compliance Certification reports. If any of the information is missing, the report will be rejected.

***Title-V Report Certification Form***

This is a one page form which is required for certification of all Title-V reports submitted. The form consists of three sections which must be completed by the reporting party.
Section I. Report Type ï Select the type of report.
Section II. Identifying Information (facility, permit and Responsible Official) ï Fill in all boxes with the required information. If any information is missing the report will be returned as incomplete.
Section III. Certification of Truth, Accuracy, and Completeness ï The signature of the Responsible Official and date are required.

***(Part 1) Permit Requirements Certification Table***

This section requires the certification of compliance and the identification of deviations associated with Title-V permit conditions. The table contains five columns, one which is pre-populated and four which must be completed by the reporting official.

Column 1. Permit Condition # and Permit Condition ï This column has been pre-populated with each permit number and condition that imposes a requirement or action for which certification of compliance must be addressed.

Column 2. Method(s) or other information or other facts used to determine the compliance status- The reporting official is to identify monitoring, recordkeeping, reporting and/or testing methods used for determining compliance with the permit condition. The response shall be a detailed explanation of information and facts used in determining compliance with this condition. A detailed explanation is required or the form will be rejected.

Column 3. Frequency of data collection used to determine compliance -The reporting official must identify whether the methods or other means used for determining the compliance status provided continuous or intermittent data and select the appropriate box.

Column 4. Compliance status with requirement- The reporting official must report if the facility was in compliance with the permit requirement during the reporting period. If the facility was out of compliance at any time during the reporting period select ñNOò. If the facility was never in non-compliance select ñYESò.

Column 5. Deviations ï The reporting official must identify if the facility has deviated from the permit condition during the reporting period. Deviations from permit terms occur when any permit term is not met, including emission control requirements and compliance assurance methods (monitoring, recordkeeping, and reporting). The following are examples of deviations: (1) emissions that exceed an emission limit; (2) parameter value that indicates that an emission limit has not been met; (3) observations or data that show noncompliance with a limitation or other requirement; (4) required monitoring that is not performed; and (5) failure to submit a report. You also must include deviations from permit terms that occur during startup, shutdown, malfunction, and upset conditions. A deviation is not necessarily a violation; violations will be determined by the New Mexico Environmental Air Quality Bureau. Select ñYESò if deviations occurred during the reporting period or ñNOò if none occurred.

***(Part 2) Deviation Summary Report.***

This section consists of three (3) questions and a Deviation Summary Table.

Question 1. Any reported deviations? Answer ñYESò or ñNOò. If you answer ñNOò you do not need to go on to the next question. If you answer ñYESò go on to question 2.

Question 2. If any deviations to permit conditions were reported, has the NMED been previously informed about the deviation? Answer ñYESò if deviations were reported either in accordance with 2.7 or on a semi-annual report. If you answer ñYESò you do not need to go on to the next question. If you answer ñNOò go to question 3 and list in the Deviation Summary Table each

deviation, not previously reported to the NMED.

Question 3. Did any of the deviations not previously reported result in excess emissions? Answer ñYESò or ñNOò. If you answer ñYESò, attach an excess emission reporting form for each deviation that resulted in excess emissions.

Deviation Summary Table.
Fill in the required information for each deviation identified in Question 2.

For all deviations answer the following:
Applicable Requirement from the permit or regulation, Emission Unit ID as identified in the permit, Cause of Deviation, Corrective Action Taken, Deviation Start Date and Time, Deviation End Date and Time, and Monitoring Method.
For deviations with excess information also include the following:
Pollutant, Amount of Emissions, and an answer to the question ñDid you attach an excess emission form?)

**Where can I get replacement forms?**

Request for replacement forms shall be addressed to Compliance Reporting Manager at 1301 Siler Road, Building B, Santa Fe, New Mexico 87507. Request shall include Permit number, Company and Facility name.

**Who do I send the completed forms *to*?**

The Title-V Annual Compliance Certification Report is sent to AQB at 1301 Siler Road, Building B, Santa Fe, New Mexico 87507. A copy of the report must also be sent to EPA.

**What if the Bureau has ruled my form incomplete or not approved it for other reasons?**

If the document has been rejected, the submitter has failed to provide adequate information for the Bureau to process the Title-V Annual Compliance Certification report. The Bureau will provide reasons for rejection and requirements for re-submittal with the notification by US Mail, email or fax.

# Title V Report Certification Form

## I. Report Type

☒ **Annual Compliance Certification**
☐ **Semi-Annual Monitoring Report**
☐ **Other Specify:**

## II. Identifying Information

| | | |
|---|---|---|
| Facility Name: STATION XYZ | | |
| Facility Address: 1213 BAYVIEW AVE. | State: NM | Zip: 87009 |
| Responsible Official (RO): LES GENERAL | Phone: (505)-575-1212 | Fax: (505)-575-5555 |
| RO Title: PRESIDENT OF OPERATIONS | RO e-mail: les.general@xyz.com | |
| Permit No. P999R1M1 | Date Permit Issued: MARCH 1, 2005 | |
| Report Due Date (as required by the permit): March 31, 2007 | Permit AI number: 0008 | |
| Time period covered by this Report: From: March 1, 2006 | To: February 29, 2007 | |

## III. Certification of Truth, Accuracy, and Completeness

I am the Responsible Official indicated above. I, (LES GENERAL) certify that I meet the requirements of 20.2.70.7.AD NMAC. I certify that, based on information and belief formed after reasonable inquiry, the statements and information contained in the attached Title V report are true, accurate, and complete.

Signature_____ Date: _____.

# Part 1 - Permit Requirements Certification Table

| Annual Compliance Certification Data for Title V Permit No. P999R1M1 | | | | |
|---|---|---|---|---|
| 1. Permit Condition # and Permit Condition: | 2. Method(s) or other information or other facts used to determine the compliance status: | 3. What is the frequency of data collection used to determine compliance? | 4. Was this facility in compliance with this requirement during the reporting period? | 5. Were there any deviations associated with this requirement during the reporting period? |
| **1.0 GENERAL CONDITIONS**<br><br>1.4 The permittee shall pay fees to the Department consistent with the fee schedule in 20.2.71 NMAC - Operating Permit Emission Fees. The fees will be assessed and invoiced separately from this permit. This condition is pursuant to 20.2.70.302.A.1.e NMAC. | Fees in the amount of $100.00 for the XYZ Station facility were submitted to the NMED-Air Quality Bureau on May 9, 2006, prior to the June 1, 2006 deadline. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| 1.5 A responsible official (as defined in 20.2.70 NMAC) shall certify the accuracy, truth and completeness of every report and compliance certification submitted to the Department as required by this permit. These certifications shall be part of each document. This condition is pursuant to 20.2.70.300.E NMAC. | The responsible official, Les General, has certified to the accuracy, truth and completeness of every report and compliance certification submitted to the NMED-Air Quality Bureau to date. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| 1.6 Revocation or termination of this permit by the Department terminates the permittee's right to operate this facility. This condition is pursuant to 20.2.70.201.B NMAC. | The XYZ facility has experienced no cause for revocation or termination of the right to operate this facility during the reporting period. | ☒ **Continuous**<br>☐ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| 1.7 The permittee shall submit an emissions inventory for this facility annually. The emissions inventory shall be submitted by the later of April 1 or within 90 days after the Department makes such request. This condition is pursuant to 20.2.73 NMAC and 20.2.70.302.A.1 NMAC. | The XYZ Facility submitted an emission inventory on May 1, 2006.<br><br>On January 18, 2006 the XYZ Facility received a written request from the NMED ï Air Quality Bureau for emissions inventory data. This request was unable to be completed in the allotted time (later of April 1 or 90 days after request) of permit condition 1.7. | ☐ **Continuous**<br>☒ **Intermittent** | ☐ **Yes**<br>☒ **No** | ☒ **Yes**<br>☐ **No** |
| 1.8 The source will continue to comply with all applicable requirements. For applicable requirements that will become effective during the term of the permit, the source will meet such requirements on a timely basis. This condition is pursuant to sections 300.D.11.c and 302.G.3 of 20.2.70 NMAC. | All current applicable requirements and future requirements imposed by the term of this permit have been and/or will be met. | ☒ **Continuous**<br>☐ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| 1.9 Compliance with this operating permit is sufficient to | All feasible actions at compliance have been addressed within the scope of conditions required in this permit. | ☒ **Continuous** | ☒ **Yes** | ☐ **Yes** |

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|---|---|---|---|---|
| comply with all NSR permits listed in Table A.1. This condition is pursuant to 20.2.70.302.A.1 NMAC. | | ☐ **Intermittent** | ☐ **No** | ☒ **No** |
| **2.0 FACILITY INFORMATION**<br><br>The following conditions are placed upon the permittee pursuant to 20.2.70.302.A.7 NMAC.<br><br>2.1 All of the process equipment authorized for this facility is listed in the table shown below (emission units that were identified as insignificant or trivial, and equipment not regulated pursuant to the Act are not included): | No new equipment, other than those authorized in the below listed table (excluding those identified as insignificant, trivial and not regulated pursuant to the Act) have been added during this reporting period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

Table 2.1, Turbines:

| Emission Unit No. | Equipment Type | Serial Number | Equipment Manufacturer & Model | Fuel Used |
|---|---|---|---|---|
| S-001 | Regenerative Cycle Turbine | 95057 | General Electric Co. M3712R (Frame 3) | Natural Gas |
| S-002 | Regenerative Cycle Turbine | 95061 | General Electric Co. M3712R (Frame 3) | Natural Gas |
| S-003 | Regenerative Cycle Turbine | 95063 | General Electric Co. M3712R (Frame 3) | Natural Gas |

| | | | | |
|---|---|---|---|---|
| **3.0 REQUIREMENTS FOR INDIVIDUAL EMISSION UNITS**<br><br>Information regarding applicable requirements, emission limits, operational limitations and requirements, work practices, and monitoring, and recordkeeping requirements is provided below for each emission unit or set of similar units.<br><br>3.1 Emission Limits:<br><br>The following table lists the emission units, and their allowable emission limits. | The emission units listed in the table below have met the permitted emission limits based on monitoring conducted per Condition 3.2.2 of the permit. Upon review of the monitoring tests conducted on February 13, 2006 the results indicate NOx emissions for Unit S-001 were at 44.3 lb/hr, Unit S-002 emissions were at 40.9 lb/hr, and Unit S-003 emissions were at 48.1 lb/hr. Unit S-001 CO emissions were at 4.3 lb/hr, Unit S-002 emissions were at 10.4 lb/hr and Unit S-003 emissions at 5.4 lb/hr.<br><br>Unit S-002 emissions were at 10.4 lb/hr during test period, which is over the 8.1lb/hr limit. | ☒ **Continuous**<br>☐ **Intermittent** | ☐ **Yes**<br>☒ **No** | ☒ **Yes**<br>☐ **No** |

Table 3.1: Maximum Allowable Emission Rates in lb/hr and ton/y*

| 1. Permit Condition # and Permit Condition: | 2. Method(s) or other information or other facts used to determine the compliance status: | 3. What is the frequency of data collection used to determine compliance? | 4. Was this facility in compliance with this requirement during the reporting period? | 5. Were there any deviations associated with this requirement during the reporting period? |
|---|---|---|---|---|

| Emission Unit No. | $NO_x$ lb/hr | $NO_x$ tons/y | CO lb/hr | CO tons/y |
|---|---|---|---|---|
| S-001 | 51.3 | 224.5 | 8.1 | 35.7 |
| S-002 | 51.3 | 224.5 | 8.1 | 35.7 |
| S-003 | 51.3 | 224.5 | 8.1 | 35.7 |
| Total Allowables** | | 673.5 | | 107.1 |

* Pounds per hour/tons per year
** Total Allowables are for information, not enforceable conditions, and used to determine annual Operating Fees.

This condition is pursuant to 40CFR50, and Paragraphs 1, 7 and 8 of 20.2.70.302.A- NMAC and NSR permit 8887.

| | | | | |
|---|---|---|---|---|
| 3.2 Emissions Monitoring and Testing Requirements<br><br>3.2.1 General Monitoring Requirements<br><br>3.2.1.1 The following monitoring and/or testing requirements shall be used to determine compliance with applicable requirements and emission limits. Any sampling, whether by portable analyzer or EPA reference method, that measures an emission rate over the applicable averaging period greater than an emission limit in this permit constitutes noncompliance with this permit. The Department may require, at its discretion, additional tests pursuant to EPA Reference Methods at any time, including when sampling by portable analyzer measures an emission rate greater than an emission limit in this permit; but such requirement shall not be construed as a determination that the sampling by portable analyzer does not establish noncompliance with this permit and shall not stay enforcement of such noncompliance based on the sampling by portable analyzer. | The XYZ Station facility used a portable analyzer during this required monitoring period. Testing was performed on February 13, 2006. No EPA reference methods or alternate testing methods were used during the monitoring period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| 3.2.1.2 If the emission unit is shutdown at the time when periodic monitoring is due to be accomplished, the permittee is not required to restart the unit for the sole purpose of performing the monitoring. Using electronic or written mail, the permittee shall notify the | In general, the Units S-001, S-002 and S-003 will have operated sufficiently such that the exhaust monitoring activities (or emission testing) will be completed within their respective timelines. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

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|---|---|---|---|---|
| Departmentôs Enforcement Section of a delay in emission tests prior to the deadline for accomplishing the tests. Upon recommencing operation, the permittee shall submit any pertinent pre-test notification requirements set forth in the current version of the Departmentôs Standard Operating Procedures For Use Of Portable Analyzers in Performance Test, and shall accomplish the monitoring. | | | | |
| 3.2.1.3 The requirement for monitoring during any monitoring period is based on the percentage of time that the unit has operated as follows:<br><br>3.2.1.3.1 If the emission unit has operated for more than 25% of a monitoring period, then the permittee shall conduct monitoring during that period.<br><br>3.2.1.3.2 If the emission unit has operated for 25% or less of a monitoring period then the monitoring is not required. After two successive periods without monitoring, the permittee shall conduct monitoring during the next period regardless of the time operated during that period, except that for any monitoring period in which a unit has operated for less than 10% of the monitoring period, the period will not be considered as one of the two successive periods.<br><br>3.2.1.3.3 A minimum of one of each type of monitoring activity shall be conducted during the five-year term of this permit. | With the exception of the OIs for 4th Qtr 2005, and 2nd Qtr 2006 on S-002, these units will have operated sufficiently such that the monitoring activities (testing and Operational Inspections) were completed within their respective timelines.<br><br>One of each type of monitoring activity has been conducted during the 5-year term of this permit (i.e., between March 1, 2005 and March 1, 2010). | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| 3.2.1.3.5 For all periodic monitoring events, except when a federal or state regulation is more stringent, three test runs shall be conducted at 90% or greater of the full normal load as stated in this permit, or in the permit application if not in the permit, and at additional loads when requested by the Department. If the 90% load cannot be achieved, the monitoring will be conducted at the maximum achievable load under prevailing operating conditions. The load and the parameters used to calculate it shall be recorded to document operating conditions and shall be included with the monitoring report that is | All periodic monitoring events thus far, have satisfied the 90% of normal load test parameter, and the calculations used to determine this result have been submitted in the 6-month (Semi-annual) monitoring report. | ☒ **Continuous**<br>☐ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

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|---|---|---|---|---|
| required to be furnished to the Department. | | | | |
| 3.2.2 For Emission Unit Numbers S-001 to S-003: This set of units is subject to the following emissions monitoring requirements. | Each of the below listed emissions monitoring requirements have been satisfied as applicable throughout the current reporting period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

Table 3.2.2, Required Monitoring:

| Emission unit Nos. | Parameters To Monitor | To Comply With | Monitoring Required | Monitoring Description |
|---|---|---|---|---|
| S-001 to S-003 | Measure Fuel Consumption | Emission Limits specified in section 3.1 | Operational Inspection, Quarterly | 3.2.2.1 |
| S-001 to S-003 | NOx, and CO | Emission Limits specified in section 3.1 | Periodic Emission Tests, Annually | 3.2.2.2 |
| S-001 to S-003 | Visible Emission | 20.2.61 NMAC | Opacity | 3.2.2.3 |

| | | | | |
|---|---|---|---|---|
| 3.2.2.1 Operational Inspection: Turbines S-001 to S-003 shall undergo fuel measurement for a monitoring period of a calendar quarter. Initial monitoring shall occur within the first monitoring period occurring after permit issuance. All subsequent monitoring shall occur in each succeeding monitoring period. No two monitoring events shall occur closer together in time than 25% of a monitoring period. | With the exception of Unit S-002 during 4th Qtr 2005, and 2nd Qtr 2006, the quarterly Operational Inspections were completed within each quarter. The reports are included within the six-month (Semi-annual) monitoring report. Unit S-002 was down for an extended period for maintenance and operated for less than 10% each of the affected quarters. Also, emails were sent to the Air Quality Bureau on Dec. 1, 2005, Feb. 1, 2006, and Apr. 20, 2006 indicating the issue. Contact at the Air Quality Bureau was John Doe. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| 3.2.2.2 Periodic Emissions Tests: Annual periodic NOx, and CO emissions tests shall be carried out on turbines S-001 to S-003 by the methods described below. The permittee shall elect to use either EPA Reference Test Methods or sampling by portable analyzer, subject to the requirements and limitations of section 3.2.1. For all types of periodic testing (fuel consumption, emissions, etc.), but not for any initial compliance test:<br>(a) The test period shall be a calendar year.<br>(b) First Test will be performed within the first test period occurring after permit issuance. | The first annual 2006 periodic tests, using method 7E, 10 and 19 for Unit S-001 to S-003 were conducted on February 13, 2006 and additional tests on Unit S-002 were conducted on February 15, 2006. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

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|---|---|---|---|---|
| (c) All subsequent monitoring shall occur in each succeeding monitoring period. No two monitoring events shall occur closer together in time than 25% of a monitoring period. | | | | |
| 3.2.2.2.1 When a portable emissions analyzer is used to measure emissions from the turbines listed in section 3.2.2, it shall be setup and operated in accordance with the manufacturer's instructions, and with the current version of the Department's Standard Operating Procedure for Use of Portable Analyzers in Performance Tests. The test may also be carried out using any effective procedure approved in advance by the Department. Emissions shall be expressed in pounds per hour. | The Testo 350 portable emission analyzer produced by Testo, Inc. of Flanders, NJ was used for testing in accordance with the instructions provided by the manufacturer. The New Mexico Environment Department ï Air Quality Bureauôs Standard Operating Procedures for Use of Portable Analyzers in Perfomance Tests was referenced during all testing activities and results have been expressed in lbs/hour. No alternate procedure has been submitted for approval to the Air Quality Bureau this reporting period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| 3.2.2.2.2 The fuel flow rate shall be measured and recorded during the test using a properly calibrated fuel flow meter. | Sierra Instruments Model 822S Top ï Trak Flow Meter was calibrated by XYZ testing on January 3, 2006 and performance verified prior to test. All data, including fuel flowrate, was submitted to the Air Quality Bureau in the 6-month (Semi-annual) monitoring report. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| 3.2.2.2.3 Turbines shall be tested in the "as found" condition. Turbines may not be adjusted or tuned prior to any test for the purpose of lowering emissions, and then returned to previous settings or operating conditions after the test is complete. | All testing on the turbines was performed ñAS-ISò under normal operating conditions. No maintenance or tuning adjustments were performed prior to testing. This was verified by two(2) operational technicians present during testing. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| 3.2.2.2.4 After the time a correlation is established between emission rate and concentration of a pollutant, the periodic emission test may consist of measuring the pollutant concentration. Exhaust flow rate at the time of correlation (by 40CFR60-method 19, by manufacturerôs correlation, or by initial testing) may be used to calculate emission rates at later tests. | Use of this condition is not yet justified for determination of emission rates and concentration of a pollutant at the XYZ facility. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

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|---|---|---|---|---|
| 3.2.2.3 Opacity Monitoring (For Units S001, S002, S003): Use of pipeline quality natural gas fuel or natural gas liquids constitutes compliance with 20.2.61 NMAC unless opacity exceeds 20%. At such time as fuel other than pipeline quality natural gas or natural gas liquids is used, opacity shall be measured in accordance with the procedures at 40CFR60, Appendix A, Method 9. Opacity measurements shall continue on a quarterly basis per calendar year for each effected unit until such time as pipeline quality natural gas or natural gas liquids are used.<br><br>3.2.2.3.1 Pipeline quality natural gas is defined as a naturally occurring fluid mixture of hydrocarbons that contains 20.0 grains or less of total sulfur per 100 standard cubic feet (scf) and is either composed of at least 70% methane by volume or has a gross calorific value between 950 and 1100 Btu per standard cubic foot<br><br>3.2.2.3.2 For the purposes of Condition 3.2.2.3 of this permit, ñnatural gas liquidsò means those substances meeting the definition in 40 CFR 60.631. | Only pipeline quality natural gas was used during this reporting period. The content of the natural gas met the companies Quality Tariff on file with the Federal Energy Regulatory Commission.<br><br>No opacity measurements were necessary during this reporting period. | ☒ **Continuous**<br>☐ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| 3.2.3 When requested by the Department, the permittee shall provide schedules of testing and monitoring activities. | No testing schedule or monitoring activity requests have been received from the NMED Air Quality Bureau during this period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| 3.2.4 Unless specifically identified as requiring immediate compliance, all monitoring requirements are effective 120 days after the date of the permit. | Initial monitoring data was acquired and submitted within 30 days of permit issuance. Permit was issued March 1, 2005. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **4.0 RECORDKEEPING**<br><br>4.1 The permittee shall follow the recordkeeping requirements listed below and provide any other information the Department may request to verify the accuracy of the monitoring.<br><br>4.1.1 Operational Inspections: Records of operational | The permittee has recorded all sampled and measured data. No additional requests from the Air Quality Bureau have been received.<br><br>Operational inspection records show the entries of all recorded data upon review.<br><br>Only pipeline quality natural gas was used during this reporting | ☒ **Continuous**<br>☐ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

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|---|---|---|---|---|
| inspections shall show the values of all parameters that will be required to be recorded by section 3.2.2.1 of this permit. The permittee shall also note the type of fuel fired (pipeline quality natural gas, field gas, etc.), and append a contemporaneous fuel analysis if the gas is other than pipeline quality natural gas. | period. | | | |
| 4.1.2 Periodic Emissions Tests: Records of periodic emissions tests shall include the turbine's fuel flow rate and horsepower at the time of the test, and the type of fuel fired (pipeline quality natural gas, field gas, etc.). | Operational inspection records were reviewed by the acting Operations Manager and each indicated fuel flow rate, horsepower, and fuel type used. The semi-annual report also included all of the above listed information. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| 4.1.2.1 If a combustion analyzer is used to measure NOx, CO, and/or excess air in the flue gas, records shall be kept of the make and model of the instrument and instrument calibration data. If an ORSAT apparatus or other gas absorption analyzer is used, the permittee shall record all calibration results. | There have been no circumstances warranting the use of a combustion analyzer or an ORSAT. If and when the necessity arises all necessary data regarding calibration, performance verification and results will be recorded. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| 4.1.2.2 Records shall be kept of all raw data used to determine flue gas flow and of all calculations used to determine flow rates and mass emissions rates. | Records of raw data were examined by the acting Operations Manager and found to be complete, including the associated calculations.<br>Any raw data used to determine flue gas flow with accompanying calculations are available upon request. Both hardcopy and electronic files are kept. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| 4.1.3 Opacity Recordkeeping: The permittee shall record dates and duration of use of any fuel other than pipeline quality natural gas and the corresponding opacity measurements.<br><br>The conditions of 4.1 are pursuant to Subsection C and Paragraph D(1) of 20.2.70.302 NMAC. | Checked with the Operations division regarding this requirement. Only pipeline quality natural gas was used during this reporting period. The companyôs Quality Tariff analysis of the natural gas used is available upon request. | ☒ **Continuous**<br>☐ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| 4.2 All sampling and measured data required by this permit for the emissions units in this facility shall be | Operations Manager, Allen Court, reviewed the Operational Inspection reports and the emissions test reports. Each document contained the minimum information required. | ☐ **Continuous** | ☒ **Yes** | ☐ **Yes** |

| 1. Permit Condition # and Permit Condition: | 2. Method(s) or other information or other facts used to determine the compliance status: | 3. What is the frequency of data collection used to determine compliance? | 4. Was this facility in compliance with this requirement during the reporting period? | 5. Were there any deviations associated with this requirement during the reporting period? |
|---|---|---|---|---|
| recorded. The minimum information to be included in these records is:<br><br>4.2.1 equipment identification (include make, model and serial number for all tested equipment and emission controls),<br><br>4.2.2 date, and time of sampling or measurements,<br><br>4.2.3 date analyses were performed,<br><br>4.2.4 the company or entity that performed the analyses,<br><br>4.2.5 analytical or test methods used,<br><br>4.2.6 results of analyses or tests,<br><br>4.2.7 operating conditions existing at the time of sampling or measurement.<br><br>The conditions of section 4.2 are pursuant to Paragraph D(1) of 20.2.70.302.C NMAC. | | ☒ **Intermittent** | ☐ **No** | ☒ **No** |
| 4.3 The permittee shall keep copies of all monitoring and measurement data, equipment calibration and maintenance records, Data Acquisition and Handling System (DAHS) if used, other supporting information, and reports required by this permit for at least five (5) years from the time the data was gathered or the reports written. Each record shall show clearly to which emission unit and/or piece of monitoring equipment it applies, and the date the data was gathered. This condition is pursuant to 20.2.70.302.D.2 NMAC. | All records, monitoring information and submitted reports have been maintained 5 years from either their submittal date or date of generation. This review was conducted on September 28, 2006 by John Doe, at the (Anytown Area Offices) that house the Companyôs Title V Permit files. | ☒ **Continuous**<br>☐ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| 4.4 The permittee shall keep a record describing off permit changes made at this source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes. This condition is pursuant to 20.2.70.302.I.2 NMAC. | No off permit changes conducted during this reporting period, thus no documentation necessary. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

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|---|---|---|---|---|
| **5.0 REPORTING**<br><br>5.1 Monitoring Reports. Monitoring reports shall clearly identify the subject turbine showing the turbine's ID number according to the operating permit. The reports shall contain the information requested in the sections below. In addition, all instances of deviations from permit requirements, including those that occur during emergencies, shall be clearly identified in the required reports.<br><br>5.1.1 Operational Inspections: The permittee shall report fuel used noting any adjustments needed to bring the turbine into compliance with permit conditions. | The semi-annual monitoring reports were reviewed and submitted within this period. They were sent on April 13, 2006 and October 28, 2005. Both reports addressed the required conditions and fuel usage was recorded with no adjustments being necessary. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| 5.1.2 Periodic Emissions Tests: Report content shall be according to the Departmentôs current version of the Standard Operating Procedure for Stack test reports. | All emission reports have explicitly addressed all requirements in the Standard Operating Procedure for Stack tests found on the NMED website located at:<br><br>http://www.nmenv.state.nm.us/aqb/enforce_compliance/compliance.html | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| 5.1.3 Opacity Reporting: The permittee shall report dates and duration of use of any fuel other than pipeline quality natural gas and the corresponding opacity measurements (if any).<br>Conditions of section 5.1 are included pursuant to 20.2.70.302.E NMAC. | Only pipeline quality natural gas was used during this reporting period. | ☒ **Continuous**<br>☐ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| 5.2 Reports of all required monitoring activities for this facility shall be submitted to the Department on the following schedule. This condition is pursuant to 20.2.70.302.E.1 NMAC. | The previous two six-month (Semi-annual) reports were submitted on the following dates: on October 28, 2005 and April 13, 2006. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

Table 5.2, Schedule of Monitoring Activity Report Submittal:

| Report for Emission Unit Nos. | Submittal Date |
|---|---|

| 1. Permit Condition # and Permit Condition: | 2. Method(s) or other information or other facts used to determine the compliance status: | 3. What is the frequency of data collection used to determine compliance? | 4. Was this facility in compliance with this requirement during the reporting period? | 5. Were there any deviations associated with this requirement during the reporting period? |
|---|---|---|---|---|
| S-001 to S-003 | The first reporting period will run from September 16th through March 15th. Report submittal will be due by April 30th.<br>The second reporting period will run from March 16th through September 15th. Report submittal will be due by October 30th. | | | |
| 5.3 The permittee shall submit reports of all deviations (including emergencies) from permit requirements to the Department when they occur. The permittee shall communicate initial notice of the deviation to the Department within twenty-four (24) hours of the start of the first business day following the discovery of the occurrence via telephone or facsimile. Within ten (10) calendar days of the start of the first business day following the discovery of the occurrence, written notice using the current version of the Departmentôs Excess Emissions Form (attached to this permit) shall be submitted to the Department. This condition is pursuant to 20.2.70.302.E.2 NMAC. | No deviations occurred or were reported during this reporting period. | ☒ **Continuous**<br>☐ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| 5.4 Emission Test Notification: Protocols for emissions tests shall be submitted to the Department at least thirty (30) days prior to the scheduled test date with content according to the Department's current version of the Standard Operating Procedure for Contents of Stack Test Protocols. If information remains the same as previously submitted protocols, test protocols shall reflect that fact and show only new information. This condition is pursuant to 20.2.70.302.E NMAC. | The protocol for testing in 2006 for Unit S-001 to S-003 was submitted to the Air Quality Bureau on January 5, 2006. The protocol was approved on January 13, 2006, and testing was conducted on February 13, 2006 and February 15, 2006. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **6.0 COMPLIANCE**<br><br>6.1 The conditions of Section 6.1 are pursuant to 20.2.70.302.E.3 NMAC. The permittee shall submit compliance certification reports certifying the compliance status of this facility with respect to all permit terms and conditions, including applicable requirements. These | The previous annual compliance certification was submitted on October 13, 2005. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

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|---|---|---|---|---|
| reports shall be made on the current version of the Compliance Certification Report Form (attached to this permit) and submitted to the Department and to EPA for a 12-month period (September 16 previous year through September 15 current year). This report is due no later than October 15th of each year. | | | | |
| 6.2 The permittee shall allow representatives of the Department, upon presentation of credentials and other documents as may be required by law, to do the following:<br><br>6.2.1 enter the permittee's premises where a source or emission unit is located, or where records that are required by this permit to be maintained are kept,<br><br>6.2.2 have access to and copy, at reasonable times, any records that are required by this permit to be maintained,<br><br>6.2.3 inspect any facilities, equipment (including monitoring and air pollution control equipment), work practices or operation regulated or required under the permit,<br><br>6.2.4 sample or monitor any substances or parameters for the purpose of assuring compliance with this permit or applicable requirements or as otherwise authorized by the federal Act.<br><br>The conditions of section 6.2 are pursuant to 20.2.70.302.G.1 NMAC. | An inspection was conducted by the NMED Air Bureau on September 16, 2005 (within this monitoring period) and access to the Station was not denied. All requested copies of records were supplied to the inspector (John Doe). | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| 6.3 A copy of this permit shall be kept at the permitted facility and shall be made available to Department personnel for inspection upon request. This condition is pursuant to 20.C2.70.302.G.3 NMAC. | A copy of Permit P999R1M1 is posted at the station located at 1234 Bay Road, Anytown, NM 87000. This was confirmed by talking to Mr. J. Smith (employee) on September 28, 2006 located in Anytown, NM. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **7.0 EMERGENCIES**<br>Conditions of 7.0 are pursuant to 20.2.70 sections 300.D(5)(g), 302.A.1, 302.A(4), and 304 NMAC.<br><br>7.1 An "emergency" means any situation arising from | Operational Manager, Allen Court, reviewed the operational records and air quality files. No emergencies defined by this requirement reported during this period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

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|---|---|---|---|---|
| sudden and reasonably unforeseeable events beyond the control of the permittee, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, or careless or improper operation. | | | | |
| 7.2 An emergency constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations contained in this permit if the permittee has demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:<br><br>(a) An emergency occurred and that the permittee can identify the cause(s) of the emergency;<br><br>(b) This facility was at the time being properly operated;<br><br>(c) During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;<br><br>(d) The permittee fulfilled notification requirements under Condition 5 of this permit. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. | Allen Court, the Operational Manager, reviewed the operational records and air quality files. No emergencies defined by this requirement reported during this period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **8.0 PERMIT REOPENING AND REVOCATION**<br><br>8.1 The conditions of 8.1 are pursuant to 20.2.70.405.A.1 NMAC. This permit will be reopened and revised when any one of the following conditions occurs, and may be revoked and reissued when 8.1.3 or | No act or communication of PERMIT REOPENING AND REVOCATION from any regulating authority has been received by the facility to date. | ☒ **Continuous**<br>☐ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. Permit Condition # and Permit Condition: | 2. Method(s) or other information or other facts used to determine the compliance status: | 3. What is the frequency of data collection used to determine compliance? | 4. Was this facility in compliance with this requirement during the reporting period? | 5. Were there any deviations associated with this requirement during the reporting period? |
|---|---|---|---|---|
| 8.1.4 occurs:<br><br>8.1.1 Additional requirements under the federal Act become applicable to this source three (3) or more years before the expiration date of this permit. If the effective date of the requirement is later than the expiration date of this permit, then the permit is not required to be reopened unless the original permit or any of its terms and conditions has been extended due to the Department's failure to take timely action on a request by the permittee to renew this permit.<br><br>8.1.2 Additional requirements, including excess emissions requirements, become applicable to this source under Title IV of the federal Act (the acid rain program). Upon approval by the Administrator, excess emissions offset plans will be incorporated into this permit.<br><br>8.1.3 The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the terms and conditions of the permit.<br><br>8.1.4 The Department or the Administrator determines that the permit must be revised or revoked and reissued to assure compliance with an applicable requirement. | | | | |
| 8.2 Proceedings to reopen or revoke this permit shall affect only those parts of this permit for which cause to reopen or revoke exists. Emissions units for which permit conditions have been revoked shall not be operated until new permit conditions have been issued for them. This condition is pursuant to 20.2.70.405.A.2 NMAC. | No act or communication of PERMIT REOPENING AND REVOCATION from any regulating authority has been received by the facility to date. | ☒ **Continuous**<br>☐ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **9.0 STRATOSPHERIC OZONE**<br><br>The permittee shall comply with the standards for recycling and emissions reductions pursuant to 40CFR82, Subpart F: | Through inquiry of Operations technicians, they used only contracted A/C companies to assist with their A/C appliances during this reporting period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. Permit Condition # and Permit Condition: | 2. Method(s) or other information or other facts used to determine the compliance status: | 3. What is the frequency of data collection used to determine compliance? | 4. Was this facility in compliance with this requirement during the reporting period? | 5. Were there any deviations associated with this requirement during the reporting period? |
|---|---|---|---|---|
| 9.1 Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to subsection 82.156. | | | | |
| 9.2 Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to subsection 82.158. | Through inquiry of Operations technicians, they used only contracted A/C companies to assist with their A/C appliances during this reporting period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| 9.3 Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to subsection 82.161. | Through inquiry of Operations technicians, they used only contracted A/C companies to assist with their A/C appliances during this reporting period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

# Part 2

# ACC Deviation Summary Report for Permit P999R1M1

| | |
|---|---|
| 1. Are there any deviations identified in Part 1, Column 5. If NO, no further information is required on Part 2 of this form. If YES, answer question 2 below. | ☐ Yes ☐ No |
| 2. Have all deviations identified in Part 1, Column 5 been reported to the NMED as required by 20.2.7 NMAC or in a Semi-Annual Monitoring Report (20.2.70.302.E.1 NMAC)? If Yes, no further information is required on Part 2 of this form. If No, answer question 3 below and enter the required information in the Deviation Summary Table for each deviation not yet reported to the NMED. | ☐ Yes ☐ No |
| 3. Did any of the deviations result in excess emissions? For excess emissions deviations that have not previously been reported per requirements of 20.2.7 NMAC, a completed Excess Emission Form for each deviation must be attached to this report. | ☐ Yes ☐ No |

## Deviation Summary Table for deviations not yet reported.

| No. | Applicable Requirement (Include Rule Citation) | Emission Unit ID(s) | Cause of Deviation | Corrective Action Taken |
|---|---|---|---|---|
| 1 | 1.7 The permittee shall submit an emissions inventory for this facility annually. The emissions inventory shall be submitted by the later of April 1 or within 90 days after the Department makes such request. This condition is pursuant to 20.2.73 NMAC and 20.2.70.302.A.1 NMAC. | N/A | Recordkeeping error. | Facility submitted an emission inventory on May 1, 2006. |
| 2 | 3.1 Emission Limits:<br><br>Allowable CO emission limit was exceeded when testing was performed on February 13, 2006 for Unit S-002. | S-002 | Compression loss in Unit S-002. A head gasket failure led a variety of problems, from compression loss (leading to power reduction and a rough engine), and exhaust gases being forced into the cooling system, leading to the engine overheating | Unit S-002 was run at less than 10% capacity and additional testing was performed on February 15, 2006. After additional testing was performed, Unit S-002 was removed from service for repair. |

| | | | | |
|---|---|---|---|---|
| | Additional requirements found in Table 3.1: Maximum Allowable Emission Rates in lb/hr and ton/y | | and increased engine wear. | |
| 3 | | | | |
| 4 | | | | |
| 5 | | | | |

## Deviation Summary Table (cont.)

| | Deviation Started | | Deviation Ended | | | | | Did you attach an excess emission form? |
|---|---|---|---|---|---|---|---|---|
| No. | Date | Time | Date | Time | Pollutant | Monitoring Method | Amount of Emissions | |
| 1 | 04/01/06 | N/A | 05/01/06 | N/A | N/A | N/A | N/A | ☐ **Yes** ☒ **No** |
| 2 | 02-13-06 | ~11:35am | 02/15/06 | ~3:30pm | Carbon Monoxide (CO) | Portable Analyzer | ~110lb | ☒ **Yes** ☐ **No** |
| 3 | | | | | | | | ☐ **Yes** ☐ **No** |
| 4 | | | | | | | | ☐ **Yes** ☐ **No** |
| 5 | | | | | | | | ☐ **Yes** ☐ **No** |

AIR QUALITY BUREAUð ENFORCEMENT SECTION 2048 GALISTEO STREET, SANTA FE, NM 87505

# EXCESS EMISSION FORM (20.2.7 NMAC)

TO BE USED FOR EMERGENCIES, FAILURES, DEVIATIONS AND MALFUNCTIONS

**Note: This form with original signature must be submitted to the address above within 10 days of the 1st business day following the start of the deviation / emergency.**

**TRACKING NUMBER:**_____

| | | |
|---|---|---|
| DATE OF SUBMISSION:<br>JANUARY 10, 2007 | TIME OF SUBMISSION:<br>AFTERNOON | COMPANY NAME:<br>COMPANY XYZ |
| NAME OF INDIVIDUAL REPORTING<br>WENDY ISBAD | TITLE:<br>SENIOR ENV. SPECIALIST | PHONE:<br>(505)-555-1212 |
| FACILITY:<br>STATION XYZ | COUNTY:<br>ANYCOUNTY | PERMIT NUMBER(S):<br>P999R1M1 and NSR 8887 |
| FAILURE DATE:<br>FEBRUARY 13, 2006 | CORRECTED DATE:<br>FEBRUARY 15, 2006 | CORRECTED TIME:<br>~4:00PM |
| DESCRIPTION OF EQUIPMENT:<br>Unit S-002, Inlet Turbine, Flare Unit FL-025, Inlet Flare | | |

NATURE AND CAUSE:

Compression loss in Unit S-002. A head gasket failure resulted in compression loss (leading to power reduction and a rough engine), and exhaust gases being forced into the cooling system, leading to the engine overheating and increased engine wear. The loss of unit S-002 resulted in flaring of excess gas at FL-025 until inlet flows could be reduced enough to eliminate flaring.

Unit had been inspected six months earlier in accordance with manufacturerôs recommendations and there was no indication of any excessive wear or imminent failure. Head gasket had been replaced in 2005 and was not due for replacement again until 2010.

An investigation into the cause indicated that the engine had been operating at RPMs higher than the manufacturerôs recommendation for the past year. Operators had been mistakenly using an operating manual for a different model.

CORRECTIVE MEASURES:

Unit S-002 was removed from service and the appropriate gaskets were replaced. Crews were placed on overtime and worked around the clock to repair the unit. The unit was returned to service in 48 hours.

Emissions were minimized by diverting inlet flows to other facilities to ultimately eliminate flaring. It takes a minimum of 24 hours to implement the required procedures to divert enough gas.

A new procedure has been implemented to require plant supervisor oversight to insure that the correct operating manual is in use for the appropriate unit.

| | | | | | |
|---|---|---|---|---|---|
| DURATION OF EXCESS EMISSIONS (HOURS) | NOx: 24 | CO: 24 | SO2: 24 | PM: | OTHER: |
| ESTIMATED EMISSIONS (LBS) | NOx: 568 | CO: 1567 | SO2: 17,234 | PM: | OTHER: |

| | | |
|---|---|---|
| After reasonable inquiry, I certify this report as true, accurate and complete.<br>**SIGNATURE OF PERSON RESPONSIBLE FOR TITLE V:** | **TITLE:**<br><br>**PRESIDENT OF OPERATIONS** | **BASIS OF ESTIMATE**<br><br>___ COMPLIANCE TESTING<br><br>___ CONTINUOUS EMISSION MONITOR<br><br>__X__ CALCULATION<br><br>___ OPERATING LOGS |
| **SIGNATURE OF REPORTING PERSON:** | **TITLE:**<br><br>**SENIOR ENV. SPECIALIST** | |