



APR 26 2013

Gerardo C. Rios, Chief
Permits Office
Air Division
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

**Re: Final - Authority to Construct / Certificate of Conformity (Minor Mod)
Project # 1124280**

Dear Mr. Rios:

The Air Pollution Control Officer has issued an Authority to Construct (S-1114-103-6) with a Certificate of Conformity to Seneca Resources Corporation. The project lowers the NOx emissions limit of a natural gas-fired IC engine for Rule 4702 compliance.

Enclosed are copies of the Authority to Construct. The application and proposal were sent to US EPA Region IX on April 17, 2013. No comments were received following the District's preliminary decision on this project.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Sincerely,



David Warner
Director of Permit Services

Enclosures
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APR 26 2013

Mr. Timothy Alburger
Seneca Resources Corporation
2131 Mars Court
Bakersfield, CA 93308-6830

**Re: Final - Authority to Construct / Certificate of Conformity (Minor Mod)
Project # 1124280**

Dear Mr. Alburger:

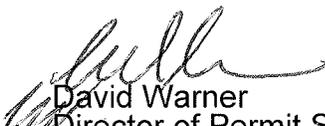
The Air Pollution Control Officer has issued an Authority to Construct (S-1114-103-6) with a Certificate of Conformity to Seneca Resources Corporation. The project lowers the NOx emissions limit of a natural gas-fired IC engine for Rule 4702 compliance.

Enclosed is the Authority to Construct and invoice. The application and proposal were sent to US EPA Region IX on April 17, 2013. No comments were received following the District's preliminary decision on this project.

Prior to operating with modifications authorized by the Authority to Construct, you must submit an application to modify the Title V permit as an administrative amendment in accordance with District Rule 2520, Section 11.5.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Sincerely,



David Warner
Director of Permit Services

Enclosures
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AUTHORITY TO CONSTRUCT

PERMIT NO: S-1114-103-6

ISSUANCE DATE: 04/26/2013

LEGAL OWNER OR OPERATOR: SENECA RESOURCES
MAILING ADDRESS: 2131 MARS COURT
BAKERSFIELD, CA 93308-6830

LOCATION: HEAVY OIL WESTERN
CA

SECTION: NE24 **TOWNSHIP:** 26S **RANGE:** 20E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 325 HP NATURAL GAS-FIRED CATERPILLAR MODEL G3406 IC ENGINE WITH THREE WAY CATALYST, DRIVING A GAS COMPRESSOR: REVISE PERMIT LIMITS TO COMPLY WITH RULE 4702, TABLE 2, CATEGORY 1.D

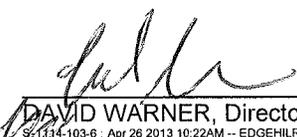
CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Permittee shall maintain with the permit accurate fugitive component count associated with operation of engine/compressor and resultant emissions calculated using EPA Publication 453/R-95-017, Table 2-4 factors. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The engine shall only burn natural gas with fuel gas sulfur content of 2.0 grains/100 Scf or less. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Air contaminant emissions shall not exceed any of the following: NOx: 11ppmv @ 15% O₂; VOC: 30 ppmv @ 15% O₂; CO: 400 ppmv @ 15% O₂; and PM₁₀: 10.0 lb/MMscf. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO



DAVID WARNER, Director of Permit Services
S-1114-103-6 : Apr 26 2013 10:22AM -- EDGEHLR : Joint Inspection NOT Required

6. The permittee shall monitor and record the stack concentrations of NO_x (as NO₂), CO, and O₂ at least once every calendar quarter using a portable emission monitor that meets District specifications [in stack O₂ monitors may be allowed if approved by the APCO]. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 1 day of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
7. If the NO_x and/or CO concentrations corrected to 15% O₂, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall notify the District within the following 1 hour, conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing by this condition. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
8. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 15% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
9. District witnessed or approved compliance source testing for NO_x, VOC, and CO emission limits shall be demonstrated within 60 days of issuance of this ATC and not less than once every 24 months thereafter. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
10. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
11. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
12. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
13. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) - EPA Method 25A or 25B, or ARB Method 100. [District Rules 1081, 4701, and 4702] Federally Enforceable Through Title V Permit
14. Fuel sulfur content and higher heating value shall be measured quarterly using gas chromatographic analysis to calculate SO_x emission rate. Test reports of measured fuel sulfur content and higher heating value shall be maintained. The calculated SO_x emission rate shall be recorded in format approved by the District. If compliance with the SO_x emission rate has been demonstrated for 8 consecutive quarters for a fuel source, then the testing frequency shall be annually. If an annual fuel sulfur content and higher heating value testing fails to show compliance, quarterly testing shall resume. [District Rule 1070] Federally Enforceable Through Title V Permit
15. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.1] Federally Enforceable Through Title V Permit
16. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Kern County Rule 407] Federally Enforceable Through Title V Permit
17. The sulfur content of the natural gas being fired in the engine shall be determined using ASTM method D1072, D3031, D4084 or D3246. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

18. Permittee shall operate this engine with a nonresettable fuel meter and a nonresettable elapsed operating time meter. In lieu of operating a nonresettable fuel meter, the owner or operator may use an alternative device, method, or technique in determining monthly fuel consumption provided that the alternative is approved by the APCO. Permittee shall maintain these required meters in proper operating condition. The fuel meter shall be calibrated periodically per the recommendations of the manufacturer. [District Rules 2201, 4701, and 4702] Federally Enforceable Through Title V Permit
19. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
20. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. VOC, NO_x, and CO concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
21. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
22. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type and quantity (cubic feet of gas or gallons of liquid) of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rule 4702] Federally Enforceable Through Title V Permit
23. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
24. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702] Federally Enforceable Through Title V Permit
25. On and after October 19, 2013, the engine shall be in full compliance with the applicable sections of 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
26. On and after October 19, 2013, the permittee must 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, after which time the emissions standards applicable to all times other than startup in Table 2d of 40 CFR 63 Subpart ZZZZ apply. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
27. On and after October 19, 2013, the engine's oil and filter shall be changed every 1,440 hours of operation or every 12 months, whichever comes first. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
28. On and after October 19, 2013, the engine's spark plugs shall be inspected every 1,440 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
29. On and after October 19, 2013, the engine's hoses and belts shall be inspected every 1,440 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

30. On and after October 19, 2013, the permittee shall maintain records of engine hours, dates, and cumulative hours since last service for each of the following maintenance activities: oil and filter changes, spark plug inspection and replacement, hose and belt inspection and replacement. [40 CFR 63 Subpart ZZZZ]
31. On and after October 19, 2013, the permittee shall maintain records that include any information necessary to demonstrate compliance with 40 CFR 63, ZZZZ. [District Rule 1070 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
32. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4702 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit