



OCT 10 2014

Jerry Frost  
Vintage Production California LLC  
9600 Ming Ave, Suite 300  
Bakersfield, CA 93311

**Re: Notice of Final Action - Minor Title V Permit Modification**  
**District Facility # S-1326**  
**Project # 1134802**

Dear Mr. Frost:

The Air Pollution Control Officer has modified the Title V permit for Vintage Production California LLC by incorporating Authority to Construct (ATC) S-1326-9-22. The project authorized designation of a 62.5 MMBtu/hr natural gas-fired steam generator as a Rule 4320 Non-Compliant Dormant Emissions Unit (DEU).

Enclosed is the modified Title V permit. The application and proposal were sent to US EPA Region IX on July 23, 2014. 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,

Arnaud Marjollet  
Director of Permit Services

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Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

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**Northern Region**  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
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**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1326-9-23

**EXPIRATION DATE:** 03/31/2016

**SECTION:** NE11 **TOWNSHIP:** 28S **RANGE:** 27E

**EQUIPMENT DESCRIPTION:**

62.5 MM BTU/HR NATURAL GAS FIRED STRUTHERS STEAM GENERATOR - DIS# 21928-82 (NORTH TREATING PLANT)

## PERMIT UNIT REQUIREMENTS

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1. Operation of this unit is not authorized until modifications are made to comply with District Rules as authorized by an Authority to Construct. [District Rule 2080] Federally Enforceable Through Title V Permit
2. While dormant, the fuel line shall be physically disconnected from the unit. [District Rule 2080] Federally Enforceable Through Title V Permit
3. While dormant, normal source testing and monitoring shall not be required. [District Rule 2080] Federally Enforceable Through Title V Permit
4. Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
5. If this unit has been designated as dormant because it does not comply with District Rules, or if the unit becomes out of compliance with District Rules while it is dormant, operation of the unit is not authorized until an Authority to Construct permit is issued approving all necessary retrofits and permit changes required to comply with the respective District Rules. [District Rule 2010] Federally Enforceable Through Title V Permit
6. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
8. The unit shall only be fired on PUC-quality natural gas and scrubbed TEOR and TVR gas from S-1326-26, '-27, '-28, '-35 and '-263 with a sulfur content no greater than 1 gr S/100 scf. [District Rules 2201, 4301, 4320, 4406, and 4801] Federally Enforceable Through Title V Permit
9. Emissions rates from the steam generator shall not exceed any of the following limits: 0.003 lb-PM10/MMBtu, 75 ppmvd CO @ 3% O2 or 0.055 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
10. Emissions shall not exceed any of the following limits when this unit is burning 50% or greater by volume PUC quality gas on a monthly average basis: 9 ppmvd NOx @ 3% O2 or 0.011 lb-NOx/MMBtu. [District Rules 2201, 4301, 4305, 4306, 4320, 4351, and 4405] Federally Enforceable Through Title V Permit
11. Emissions shall not exceed any of the following limits when the unit is burning less than 50% by volume PUC quality gas on a monthly average basis: 12 ppmvd NOx @ 3% O2 or 0.014 lb-NOx/MMBtu. [District Rules 2201, 4301, 4305, 4306, 4320, 4351, and 4405] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

12. The applicable NOx emissions concentration for each month shall be determined based on the volume and type of fuel combusted in the unit (< 50% by volume PUC quality gas or >= 50% by volume PUC quality gas). Permittee shall maintain supporting records that demonstrate the type of fuel combusted. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
13. Permittee shall test annually the sulfur content of the fuel gas combusted in steam generator using ASTM method D1072, D3031, D4084, or D3246 and make test results readily available for District inspection. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
14. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise specified in the Permit to Operate, no determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
15. A source test to demonstrate compliance with NOx, and CO emission limits shall be performed within 60 days of startup of this unit. The NOx limit in effect at the time of the startup source testing will be determined based on the volume and type of fuel combusted (>= 50% PUC quality or < 50% PUC quality gas) and shall be identified in the source test protocol. Whenever the fuel type is switched from the fuel type combusted during the initial startup of this unit, compliance source testing for NOx and CO shall be conducted within 90 days of the date the fuel type is switched. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
16. Source testing is required at least once every twelve (12) months from the initial source test date of each fuel type (>= 50% PUC quality gas or < 50% PUC quality gas). After initial compliance demonstration with the NOx and CO emission limits for each fuel type on two (2) consecutive source tests, the unit shall be tested not less than once every thirty-six (36) months from the last test date for that fuel type. Testing shall not be required for any fuel type not in use during the 36 month period until such time the fuel type is switched, after which testing shall be performed within 90 days of switching fuel types. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. Compliance source testing after switching fuel types is not required if the unit continues to demonstrate compliance with 9 ppmvd NOx @ 3% O2 or 0.011 lb-NOx/MMBtu and 75 ppmvd CO @ 3% O2 or 0.055 lb-CO/MMBtu while firing on less than 50% by volume PUC quality gas. In which case, source testing shall only be required every thirty-six (36) months for the less than 50% by PUC quality gas. If the result of a source test demonstrates that the unit does not meet 9 ppmvd NOx @ 3% O2 or 0.011 lb-NOx/MMBtu and 75 ppmvd CO @ 3% O2 or 0.055 lb-CO/MMBtu while firing on less than 50% by volume PUC quality gas, the source test frequency shall revert to at least one test every 36 months for each fuel type. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
18. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
19. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, stack gas moisture content - EPA Method 4, stack gas velocities - EPA Method 2, fuel gas sulfur content - ASTM D1072, ASTM D3246, ASTM D6228 (GC-FPD) or double GC for H2S and mercaptans, and methane content - ASTM D1945. [District Rules 1081, 4305, 4306, 6.2, 4320, and 4351] Federally Enforceable Through Title V Permit
21. 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. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
22. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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23. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
24. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and 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 required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
25. 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 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
26. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (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 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. Permittee shall maintain records of fuel gas sulfur compound measurements. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
28. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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