



JUL 25 2013

Mr. Timothy R. Alburger
Seneca Resources
2131 Mars Court
Bakersfield, CA 93308

RE: Final – Authority to Construct/Certificate of Conformity (Minor Mod)
Facility Number: S-1114
Project Number: S-1124440

Dear Mr. Alburger:

The Air Pollution Control Officer has issued Authority to Construct permits S-1114-10-29, -20-17, and -74-14 with a Certificate of Conformity to Seneca Resources to decrease the NOx emissions rate for three steam generators for compliance with District Rule 4320, located within the Midway-Sunset and North Lost Hills oilfields.

Enclosed are the Authority to Construct permits. The District's analysis of the proposal was sent to US EPA Region IX on July 3, 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 permits, you must submit an application to modify the Title V permit as an administrative amendment in accordance with District Rule 2520, Section 11.5.

Also enclosed is an invoice for the engineering evaluation fees pursuant to District Rule 3010. Please remit the amount owed, along with a copy of the attached invoice, before the due date.

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

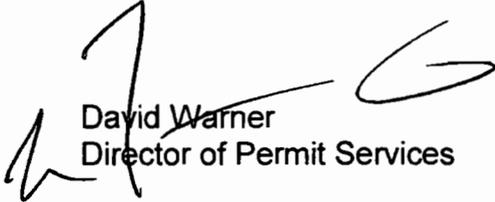
Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

Mr. Alburger
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Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Jim Swaney at (559) 230-6000.

Sincerely,

A handwritten signature in black ink, appearing to read "David Warner", is written over the typed name and title.

David Warner
Director of Permit Services

DW:jss

Enclosures

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



AUTHORITY TO CONSTRUCT

PERMIT NO: S-1114-10-29

ISSUANCE DATE: 07/19/2013

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

LOCATION: HEAVY OIL WESTERN
CA

SECTION: SE15 **TOWNSHIP:** 31S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 62.5 MMBTU/HR NATURAL GAS/TEOR GAS-FIRED STRUTHERS STEAM GENERATOR WITH LOW NOX BURNER AND O2 CONTROLLER SERVED BY AIRPOL DUAL VALVE TRAY SOX SCRUBBER WITH CHEVRON TYPE MIST ELIMINATOR AND WET ELECTROSTATIC PRECIPITATOR SHARED WITH S-1114-74: LOWER NOX EMISSION LIMIT TO 9 PPMVD @ 3% O2 FOR DISTRICT RULE 4320 COMPLIANCE

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. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] 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-1114-10-29 : Jul 19 2013 1:55PM - SANDHUG : Joint Inspection NOT Required

6. Steam generator is authorized to operate at the following locations: SE Section 14, T31S, R22E; SE and NE Section 15, T31S, R22E; NE Section 24, T26S, R20E; Sections 18, 19, and 20, T11N, R 23W. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102] Federally Enforceable Through Title V Permit
8. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO₂, nor 10 lb/hr. [District Rule 4201 and District Rule 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
9. Total fuel consumption, including TEOR gas, shall not exceed 511,000 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Except as provided below, fuel burned in this unit shall not be PUC quality natural gas. PUC quality natural gas is any gaseous fuel where the sulfur content is no more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet, no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet, and at least 80% methane by volume. [District Rule 4320] Federally Enforceable Through Title V Permit
11. Fuel H₂S, total sulfur, and methane content shall be determined semi-annually using the following test methods H₂S: ASTM D6228; total sulfur: ASTM D1072; ASTM D3246, double GC for H₂S and mercaptans or ASTM D6228; and methane content: ASTM D1945. [District Rule 4320] Federally Enforceable Through Title V Permit
12. When PUC quality gas is burned, the total gas fired in this unit in any calendar month shall be less than 50% by volume PUC quality natural gas. [District Rule 4320] Federally Enforceable Through Title V Permit
13. In months where PUC quality gas is burned, the permittee shall maintain records on a calendar month basis of the volume of PUC quality natural gas and the total gas fired in this unit. Permittee shall keep monthly records of the percentage by volume of PUC quality gas fired and indicate if the volume of PUC quality gas fired is less than 50%. [District Rule 4320] Federally Enforceable Through Title V Permit
14. Permittee shall install and maintain operational non-resettable, totalizing mass or volumetric flow meter(s) in the fuel (natural gas and TEOR gas) line(s) of the unit. Permittee shall determine the higher heating value (hhv) of the fuels (natural gas and TEOR gas) on a quarterly basis once per calendar quarter and whenever there is a change in the source of the TEOR gas. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Exhaust from unit shall be directed only to SO₂ scrubber authorized herein except when burning PUC regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Scrubber/wet ESP shall be in operation when combusting TEOR gas. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Steam generator firebox convection section, scrubber bypass valve, and all flue gas ductwork shall be maintained with no detectable leaks. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emission rate of SO_x from S-1114-10, and '-74 shall not exceed 262,537 lb/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Scrubber recirculation liquid pH shall be maintained only by the addition of caustic, including sodium hydroxide and sodium carbonate. Other caustics may be used upon written District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Scrubber liquor pH shall be maintained between 6 and 8, and shall be continuously monitored. [District Rule 2201 and 40 CFR part 64] Federally Enforceable Through Title V Permit
21. Scrubber mist eliminator shall be properly cleaned and maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Scrubber recirculation liquor liquid to gas ratio shall be maintained at no less than 8.0 gpm/1000 acfm. [District Rule 2201] Federally Enforceable Through Title V Permit
23. Scrubber/wet ESP control efficiency shall not be less than 95% by weight sulfur compounds. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

24. When any unit connected to scrubber is burning TEOR gas, scrubber shall be operating and permittee shall demonstrate compliance with PM10 and sulfur oxide emissions limit by stack source testing within 60 days of initial scrubbing date and annually thereafter unless no TEOR gas has been burned since the last scrubber performance source test. Sulfur removal efficiency of scrubber shall be demonstrated during initial stack source test and calculated with subsequent tests. Ongoing compliance with sulfur oxide emissions limit shall be by calculation using the scrubber liquid pH, the demonstrated sulfur removal efficiency, and the fuel gas sulfur content. Fuel gas sulfur content shall be obtained by sample analysis at least quarterly. [District Rule 2201] Federally Enforceable Through Title V Permit
25. When unit is operated without scrubber/wet ESP, permittee shall demonstrate compliance with the sulfur oxide emissions limit by analysis of the fuel gas sulfur content within 60 days of initiating operation without scrubber. Analyses, as approved by the APCO, provided by the gas supplier may be used to satisfy this requirement. [District Rule 2201] Federally Enforceable Through Title V Permit
26. When complying with PM10 and SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Methods 5 or 201A, 6, 6B, 8, or ARB 100. When operating unscrubbed, a grab sample analysis by double GC performed in the laboratory and EPA Method 19 may be used to calculate SOx emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every 36 months unless testing is required by scrubber operational mode change as noted above. Annual source testing shall resume if any test fails to show compliance. [District Rule 2201] Federally Enforceable Through Title V Permit
27. At no time shall amount of TEOR gas introduced to this unit and all units connected to scrubber/wet ESP exceed the amount introduced during a source test demonstrating compliance with permit limits. [District Rule 2201] Federally Enforceable Through Title V Permit
28. Emissions rates shall not exceed any of the following: NOx (as NO2): 9 ppmv @ 3% O2 or 0.011 lb/MMBtu, SOx (as SO2): 0.324 lb/MMBtu, PM10: 0.0713 lb/MMBtu, CO: 42 ppmv @ 3% O2 or 0.031 lb/MMBtu, or VOC: 0.003 lb/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
29. Source testing to demonstrate compliance with PM10, SOx, NOx, and CO emission limits shall be conducted annually, except as provided below. [District Rules 2520, 9.3.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
30. Source testing to demonstrate compliance with PM10, SOx, NOx, and CO emission limits shall be conducted not less than once every 36 months if compliance is demonstrated on two consecutive annual tests. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
31. If permittee fails any compliance demonstration for NOx and/or CO emission limits when testing not less than once every 36 months, compliance with NOx and CO emission limits shall be demonstrated not less than once every 12 months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
32. Compliance source testing shall be conducted under conditions representative of normal operation. [District Rule 2201] Federally Enforceable Through Title V Permit
33. 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. 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 4320. [District Rules 4305, 4306, and 4320]
34. Source test results from an individual unit that is identical to this unit, in terms of rated capacity, operational conditions, fuel used, and control method, as approved by the APCO, will satisfy the NOx and CO source testing requirement. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
35. 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
36. 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

CONDITIONS CONTINUE ON NEXT PAGE

37. 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
38. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (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, sulfur oxides - ARB Methods 1-6, and fuel gas sulfur content - ASTM D3246 or double GC for H₂S and mercaptans. [District Rules 1081, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
39. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ 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
40. If either the NO_x or CO concentrations corrected to 3% O₂, 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
41. 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
42. 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 3% 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 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
43. Permittee shall maintain records of fuel gas and TEOR gas sulfur content, higher heating value, annual consumption in MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
44. Permittee shall comply with all notification and recordkeeping requirements of 40 CFR 60.7 a (1)(3) and (b). [District Rule 4001] Federally Enforceable Through Title V Permit
45. Fuel gas sulfur content shall be determined using ASTM D3246 or double GC for H₂S and mercaptans. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
46. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO₂. Compliance with this requirement may be demonstrated by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit. [District Rule 2520, 9.3.2 and District Rule 4301, 5.2.1] Federally Enforceable Through Title V Permit
47. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period. To demonstrate compliance with this requirement the operator shall test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels. [District Rule 2520, 9.3.2, Kern County Rule 407] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

48. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 1070, 1081, 4201, 4301, 4305, 4306, and 4320. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
49. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: Kern County Rules 107, and 407. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
50. When the scrubber is operating, the scrubber liquor pH shall be recorded every 15 minutes. [40 CFR part 64] Federally Enforceable Through Title V Permit
51. An excursion from the scrubber liquor pH level is defined as a daily pH reading of less than 6 or greater than 8. Upon detecting any excursion from the acceptable pH level, the permittee shall investigate the excursion and take corrective action to restore required pH level and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR part 64] Federally Enforceable Through Title V Permit
52. Records of scrubber pH monitoring equipment downtime, scrubber pH level excursions, and scrubber operation shall be maintained. [40 CFR part 64] Federally Enforceable Through Title V Permit
53. The scrubber pH sensor shall be calibrated annually. Calibration of the pH sensor shall be conducted by comparison of the sensor reading with a laboratory measurement of the scrubber recirculation fluid. [40 CFR part 64] Federally Enforceable Through Title V Permit
54. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR part 64] Federally Enforceable Through Title V Permit
55. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR part 64] Federally Enforceable Through Title V Permit
56. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR part 64.8. [40 CFR part 64] Federally Enforceable Through Title V Permit
57. 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
58. Steam generator firebox convection section, scrubber bypass valve, and all flue gas ductwork shall be inspected monthly for detectable leaks. Operator shall repair each leak within 15 calendar days of detection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
59. Records of steam generator firebox convection section, scrubber bypass valve, and all flue gas ductwork monthly inspections shall be maintained. Inspection log shall contain at a minimum the following: 1) date of inspection; 2) name of inspector; 3) identification and location of leak; and 4) date when leak has been repaired. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
60. 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
61. 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 Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit



AUTHORITY TO CONSTRUCT

PERMIT NO: S-1114-20-17

ISSUANCE DATE: 07/19/2013

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

LOCATION: HEAVY OIL WESTERN
CA

SECTION: SE15 **TOWNSHIP:** 31S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 62.5 MMBTU/HR STRUTHERS NATURAL/TEOR GAS-FIRED STEAM GENERATOR WITH NORTH AMERICAN MAGNA-FLAME LE BURNER, MULTIPLE LOCATIONS - M & M GENERATOR #5: LOWER NOX EMISSION LIMIT TO 9 PPMVD @ 3% O2 FOR DISTRICT RULE 4320 COMPLIANCE

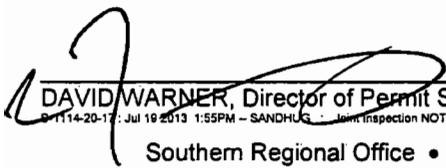
CONDITIONS

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. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
6. Steam generator is authorized to operate at the following locations: SE Section 14, T31S, R22E; SE and NE Section 15, T31S, R22E; NE Section 24, T26S, R20E; Sections 18, 19, and 20, T11N, R 23W. [District Rule 2201] 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-1114-20-17 Jul 19 2013 1:55PM - SANDHUG - Joint Inspection NOT Required

7. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102]
8. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO₂, nor 10 lb/hr. [District Rules 4201 and 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
9. Except as provided below, fuel burned in this unit shall not be PUC quality natural gas. PUC quality natural gas is any gaseous fuel where the sulfur content is no more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet, no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet, and at least 80% methane by volume. [District Rule 4320] Federally Enforceable Through Title V Permit
10. Fuel H₂S, total sulfur, and methane content shall be determined semi-annually using the following test methods H₂S: ASTM D6228; total sulfur: ASTM D1072; ASTM D3246, double GC for H₂S and mercaptans or ASTM D6228; and methane content: ASTM D1945. [District Rule 4320] Federally Enforceable Through Title V Permit
11. When PUC quality gas is burned, the total gas fired in this unit in any calendar month shall be less than 50% by volume PUC quality natural gas. [District Rule 4320] Federally Enforceable Through Title V Permit
12. In months where PUC quality gas is burned, the permittee shall maintain records on a calendar month basis of the volume of PUC quality natural gas and the total gas fired in this unit. Permittee shall keep monthly records of the percentage by volume of PUC quality gas fired and indicate if the volume of PUC quality gas fired is less than 50%. [District Rule 4320] Federally Enforceable Through Title V Permit
13. Permittee shall install and maintain operational non-resettable, totalizing mass or volumetric flow meter(s) in the fuel (natural gas and TEOR gas) line(s) of the unit. Permittee shall determine the higher heating value (hhv) of the fuels (natural gas and TEOR gas) on a quarterly basis once per calendar quarter and whenever there is a change in the source of the TEOR gas. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Emissions rates shall not exceed any of the following limits: NO_x (as NO₂): 9 ppmv @ 3% O₂ or 0.011 lb/MMBtu, SO_x: 0.00285 lb/MMBtu, PM₁₀: 0.005 lb/MMBtu, CO: 50 ppmv @ 3% O₂ or 0.037 lb/MMBtu, or VOC: 0.003 lb/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
15. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ 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
16. If either the NO_x or CO concentrations corrected to 3% O₂, 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
17. 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

CONDITIONS CONTINUE ON NEXT PAGE

18. 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 3% 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 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. 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. 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 4320. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. 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
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. 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
23. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
24. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
25. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
26. Source testing to measure natural gas-combustion NO_x and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. 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
28. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO₂. Compliance with this requirement may be demonstrated by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit. [District Rules 2520, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit
29. Permittee shall demonstrate compliance with the sulfur oxide emissions limit by analysis of the fuel gas sulfur content at least annually. [District Rules 2520, 9.3.2 and 4320, 5.7.6.1] Federally Enforceable Through Title V Permit
30. If compliance with SO_x emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D1072, D3031, D4084, D3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
31. If fuel analysis is used to demonstrate compliance with conditions of this permit, the fuel higher heating value for each fuel shall be certified by a third party fuel supplier or determined by ASTM D1826-88 or D1945-81 in conjunction with ASTM D3588-89 for gaseous fuels. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

32. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period. To demonstrate compliance with this requirement the operator shall test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels. [District Rule 2520, 9.3.2 and Kern County Rule 407] Federally Enforceable Through Title V Permit
33. 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
34. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 1070, 1081, 4201, 4301, 4305, 4306, and 4320. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
35. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: Kern County Rules 107, and 407. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
36. 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 Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit



AUTHORITY TO CONSTRUCT

PERMIT NO: S-1114-74-14

ISSUANCE DATE: 07/19/2013

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

LOCATION: HEAVY OIL WESTERN
CA

SECTION: NE15 **TOWNSHIP:** 31S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 62.5 MMBTU/HR NATURAL/TEOR GAS-FIRED STEAM GENERATOR (CUSA ID # 50-1-15A, DIS# 43005-78) WITH O2 CONTROLLER AND SO2 SCRUBBER AND WET ELECTROSTATIC PRECIPITATOR SHARED WITH UNIT S-1114-10: LOWER NOX EMISSION LIMIT TO 9 PPMVD @ 3% O2 FOR DISTRICT RULE 4320 COMPLIANCE

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. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rule 4201 and District Rule 4301, 5.1 and 5.2.3] 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-1114-74-14 : Jul 19 2013 1:55PM - SANDHUG : Joint Inspection NOT Required

6. Steam generator is authorized to operate at the following locations: SE Section 14, T31S, R22E; SE and NE Section 15, T31S, R22E; NE Section 24, T26S, R20E; Sections 18, 19, and 20, T11N, R 23W. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The permittee shall notify the District Compliance Division of each location at which the operation is located in excess of 24 hours. Such notification shall be made in writing no later than 48 hours after starting operation at the location. [District Rule 1070 and Kern County Rule 107] Federally Enforceable Through Title V Permit
8. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102]
9. When operating at NE15, T31S/R22E, scrubber shall be used when burning TEOR gas. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Except as provided below, fuel burned in this unit shall not be PUC quality natural gas. PUC quality natural gas is any gaseous fuel where the sulfur content is no more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet, no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet, and at least 80% methane by volume. [District Rule 4320] Federally Enforceable Through Title V Permit
11. Fuel H₂S, total sulfur, and methane content shall be determined semi-annually using the following test methods H₂S: ASTM D6228; total sulfur: ASTM D1072; ASTM D3246, double GC for H₂S and mercaptans or ASTM D6228; and methane content: ASTM D1945. [District Rule 4320] Federally Enforceable Through Title V Permit
12. When PUC quality gas is burned, the total gas fired in this unit in any calendar month shall be less than 50% by volume PUC quality natural gas. [District Rule 4320] Federally Enforceable Through Title V Permit
13. In months where PUC quality gas is burned, the permittee shall maintain records on a calendar month basis of the volume of PUC quality natural gas and the total gas fired in this unit. Permittee shall keep monthly records of the percentage by volume of PUC quality gas fired and indicate if the volume of PUC quality gas fired is less than 50%. [District Rule 4320] Federally Enforceable Through Title V Permit
14. Steam generator firebox convection section, scrubber bypass valve, and all flue gas ductwork shall be maintained with no detectable leaks. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Emission rates of SO_x for units S-1114-10 and -74 shall not exceed 262,537 lb/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Emissions rates shall not exceed any of the following: NO_x (as NO₂): 9 ppmv @ 3% O₂ or 0.011 lb/MMBtu, SO_x (as SO₂): 0.324 lb/MMBtu, PM₁₀: 0.0713 lb/MMBtu, CO: 29 ppmv @ 3% O₂ or 0.021 lb/MMBtu, or VOC: 0.003 lb/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. At no time shall TEOR gas introduced to this unit and all units connected to scrubber exceed the amount introduced during a source test demonstrating compliance with permit limits. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Source testing to measure NO_x and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. Compliance source testing shall be conducted under conditions representative of normal operation. [District Rule 2201] Federally Enforceable Through Title V Permit
20. 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. 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 4320. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. Source test results from an individual unit that is identical to this unit, in terms of rated capacity, operational conditions, fuel used, and control method, as approved by the APCO, will satisfy the NO_x and CO source testing requirement. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

22. 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
23. 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
24. 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
25. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (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, sulfur oxides - ARB Methods 1-6, and fuel gas sulfur content - ASTM D3246 or double GC for H₂S and mercaptans. [District Rules 1081, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
26. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ 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
27. If either the NO_x or CO concentrations corrected to 3% O₂, 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
28. 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
29. 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 3% 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 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
30. Permittee shall maintain records of fuel gas and TEOR gas sulfur contents and annual consumption of each. [District Rule 2201] Federally Enforceable Through Title V Permit
31. Steam generator firebox convection section, scrubber bypass valve, and all flue gas ductwork shall be inspected monthly for detectable leaks. Operator shall repair each leak within 15 calendar days of detection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
32. Records of steam generator firebox convection section, scrubber bypass valve, and all flue gas ductwork monthly inspections shall be maintained. Inspection log shall contain at a minimum the following: 1) date of inspection; 2) name of inspector; 3) identification and location of leak; and 4) date when leak has been repaired. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
33. Fuel gas sulfur content shall be determined using ASTM D3246 or double GC for H₂S and mercaptans. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

34. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO₂. [District Rule 4301] Federally Enforceable Through Title V Permit
35. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period. [Kern County Rule 407] Federally Enforceable Through Title V Permit
36. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 1070, 1081, 4201, 4301, 4305, 4306, and 4320. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
37. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: Kern County Rules 107, and 407. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
38. Scrubber/wet ESP control efficiency shall not be less than 95% by weight sulfur compounds. [District Rule 4320] Federally Enforceable Through Title V Permit
39. When the scrubber is operating, scrubber liquor pH shall be maintained between 6 and 8, and shall be continuously monitored. [40 CFR part 64] Federally Enforceable Through Title V Permit
40. When the scrubber is operating, the scrubber liquor pH shall be recorded every 15 minutes. [40 CFR part 64] Federally Enforceable Through Title V Permit
41. An excursion from the scrubber liquor pH level is defined as a daily pH reading of less than 6 or greater than 8. Upon detecting any excursion from the acceptable pH level, the permittee shall investigate the excursion and take corrective action to restore required pH level and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR part 64] Federally Enforceable Through Title V Permit
42. Records of scrubber pH monitoring equipment downtime, scrubber pH level excursions, and scrubber operation shall be maintained. [40 CFR part 64] Federally Enforceable Through Title V Permit
43. The scrubber pH sensor shall be calibrated annually. Calibration of the pH sensor shall be conducted by comparison of the sensor reading with a laboratory measurement of the scrubber recirculation fluid. [40 CFR part 64] Federally Enforceable Through Title V Permit
44. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR part 64] Federally Enforceable Through Title V Permit
45. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR part 64] Federally Enforceable Through Title V Permit
46. If the District or EPA determine that a Quality improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR part 64.8. [40 CFR part 64] Federally Enforceable Through Title V Permit
47. 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
48. 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 and 4306] Federally Enforceable Through Title V Permit
49. 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 Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit