



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

SEP 17 2012

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

Re: **Notice of Minor Title V Permit Modification**
District Facility # S-1547
Project # 1113986

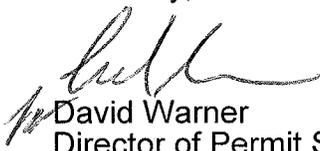
Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Aera Energy, LLC is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct S-1547-722-19 into the Title V operating permit. The modification designates the 62.5 MMBtu/hr steam generator as a compliant dormant emissions unit.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct S-1547-722-19, emission increases, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

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

Sincerely,



David Warner
Director of Permit Services

Enclosures

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
www.valleyair.org

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



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

SEP 17 2012

Brent Winn
Aera Energy, LLC
PO Box 11164
Bakersfield, CA 93389-1164

Re: Notice of Minor Title V Permit Modification
District Facility # S-1547
Project # 1113986

Dear Mr. Winn:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authority to Construct S-1547-722-19 into the Title V operating permit. The modification designates the 62.5 MMBtu/hr steam generator as a compliant dormant emissions unit.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct S-1547-722-19, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

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

Sincerely,

A handwritten signature in black ink, appearing to read "David Warner".

David Warner
Director of Permit Services

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Tel: (661) 392-5500 FAX: (661) 392-5585

TITLE V APPLICATION REVIEW

Minor Modification
Project #: 1113986

Engineer: Steve Roeder
Date: 9/11/12

Facility Number: S-1547
Facility Name: Aera Energy, LLC
Mailing Address: PO Box 11164
Bakersfield, CA 93389-1164

Reviewed by ASURE AWE

SEP 14 2012

Contact Name: Brent Winn
Phone: (661) 665-7437

Responsible Official: J.D. Story
Title: Process Supervisor

I. PROPOSAL

Aera Energy LLC is proposing a Title V minor permit modification (MM) to incorporate the recently issued ATC number S-1547-722-19 into the Title V operating permit. The modification designates the steam generator as a compliant dormant emissions unit (DEU).

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

Since the time ATC S-1547-722-19 has been issued, ATC S-1547-722-22 (MM S-1547-722-23) has been implemented. Therefore, the six DEU conditions will be added to the top of the latest permit (S-1547-722-23).

In addition, since the time that ATC S-1547-722-19 was issued, the standard permit conditions associated with making a unit dormant have been revised. Therefore, the new permit will contain the latest revisions to the DEU permit conditions.

II. FACILITY LOCATION

Belridge Oilfield, Heavy Oil Western Stationary Source
SW Section 1, Township 29S, Range 21E

III. EQUIPMENT DESCRIPTION

Pre-Project Equipment Description

S-1547-722-23: 62.5 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH A GIDEON LOW ULTRA LOW NOX BURNER AND FLUE GAS RECIRCULATION (FGR) (#1-1C, BELRIDGE)

ATC Equipment Description

S-1547-722-19: MODIFICATION OF 62.5 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH A COEN MODEL #QLN-ULN 3.2 LOW-NOX BURNER AND FLUE GAS RECIRCULATION (FGR) (#1-1C, BELRIDGE): DESIGNATE AS A RULE 4306 COMPLIANT DORMANT EMISSIONS UNIT

Proposed Permit Equipment Description

S-1547-722-21: 62.5 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH A GIDEON LOW ULTRA LOW NOX BURNER AND FLUE GAS RECIRCULATION (FGR) (#1-1C, BELRIDGE)

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted 6/21/01)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

Aera Energy has proposed to designate the steam generator as a compliant dormant emissions unit. While the unit is designated as dormant, the fuel line will be disconnected and typical monitoring and source testing will not be required.

When the steam generator is designated as active, monitoring will resume and a source test will be required within 60 days of re-start.

The following Condition Map shows where the conditions from the original permit are found in the new permit, identifies which conditions have been removed from the old permit, and identifies which conditions have been added to the new permit. If there are any special comments, they are identified in the comment column.

S-1547-722-23 → S-1547-722-21

Condition Map		
Condition on 722-23	Condition on 722-21	Comments
1 - 32	7 - 38	No Changes
-	1 - 6	Conditions added to designate this unit as a dormant emissions unit

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and

3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit S-1547-722-21
- B. Authorities to Construct S-1547-722-19
- C. Emissions Increases
- D. Application
- E. Previous Title V Operating Permit S-1547-722-23

ATTACHMENT A

Proposed Modified Title V Operating
Permits S-1547-722-21

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-722-21

EXPIRATION DATE: 05/31/2016

SECTION: SW01 **TOWNSHIP:** 29S **RANGE:** 21E

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH A COEN MODEL #QLN-ULN 3.2 LOW-NOX BURNER AND FLUE GAS RECIRCULATION (FGR) (#1-1C, BELRIDGE)

PERMIT UNIT REQUIREMENTS

1. While dormant, the fuel line shall be physically disconnected from the unit. [District Rule 2080] Federally Enforceable Through Title V Permit
2. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080] Federally Enforceable Through Title V Permit
3. While dormant, normal source testing shall not be required. [District Rule 2080] Federally Enforceable Through Title V Permit
4. Upon recommencing operation of this unit, normal source testing shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
5. Any source testing required by this permit shall be performed within 60 days of recommencing operation of this unit, regardless of whether the unit remains active or is again designated as dormant. [District Rule 2080] Federally Enforceable Through Title V Permit
6. 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 Rules 1070 and 2520] Federally Enforceable Through Title V Permit
7. Copies of all fuel invoices showing quantity and delivery points of gas delivered and copies of quality terms of gas delivery contracts shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. {520} The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit
9. {557} When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
10. 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 D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.4.2; 4305, 6.2.1; and 4351, 6.2.1] 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.

11. The operator shall demonstrate compliance with this unit's sulfur compound exhaust concentration limit(s) using one of the following: test the sulfur content of each fuel source, or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rules 2520, 9.4.2, 4301, 5.2.1 and 4801.3.1] Federally Enforceable Through Title V Permit
12. {565} Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of 40 CFR 60, Subpart Dc (except 60.44c(g) and (h) and 60.48c). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
13. Steam generator shall be operated at no greater than 1,466.7 MMBtu hhv/day heat input. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Permittee shall maintain records of higher heating value and daily quantity of natural gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Natural gas fuel sulfur content shall not exceed 0.75 gr S/100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The total gas fired in this unit, on a monthly volume basis, shall be less than 50% PUC-quality natural gas (as defined by Rule 4320). [District Rule 4320] Federally Enforceable Through Title V Permit
17. The permittee shall maintain monthly records of the volume of PUC quality natural gas (as defined in Rule 4320) 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
18. 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, or ASTM D6228; and methane content: ASTM D1945. [District Rule 4320] Federally Enforceable Through Title V Permit
19. Emission rates, except during startup, shutdown, and refractory curing, shall not exceed any of the following limits: PM₁₀: 0.005 lb/MMBtu, SO_x (as SO₂): 0.002 lb/MMBtu, VOC: 0.003 lb/MMBtu, NO_x (as NO₂): 0.014 lb/MMBtu or 12 ppmv @ 3% O₂, or CO: 0.030 lb/MMBtu or 40 ppmv @ 3% O₂. [District Rules 2201, 2520, 4201, 4301, 4305, 4306, 4405, 4406, 4320, 4801 and Kern County Rules 424 and 425] Federally Enforceable Through Title V Permit
20. Emission rates during startup, shutdown and refractory curing shall not exceed any of the following limits: particulate matter - 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO₂; sulfur - 200 pounds of SO₂ per hour, or 2000 ppmv as SO₂, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO₂ - 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4101, 4102, 4301, 4405, 4406, 4801 and Kern County Rules 424 and 425] Federally Enforceable Through Title V Permit
21. Emission rates shall not exceed any of the following limits: PM₁₀: 7.3 lb/day, SO_x (as SO₂): 2.9 lb/day, VOC: 4.4 lb/day, NO_x (as NO₂): 52.8 lb/day or 7495 lb/year, or CO: 44.0 lb/day [District Rule 2201] Federally Enforceable Through Title V Permit
22. During a "shakedown" period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO_x emission shall not exceed 15 ppmvd NO_x @ 3% O₂ or 0.018 lb-NO_x/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline selected for this unit. Permittee shall maintain a record of the date of initial operation for at least 5 years. [District Rule 4320] Federally Enforceable Through Title V Permit
23. 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 and 4306] 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.

24. 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 and 4306] Federally Enforceable Through Title V Permit
25. Duration of start-up and shutdown (as defined in Rule 4320) shall not exceed 2 hours each per occurrence. Refractory curing period is defined as a maintenance-based reduced-load period of time during which a unit is brought from a shutdown status to staged rates of firing for the sole purpose of curing new refractory lining of the unit, and shall not exceed 30 hours per occurrence. The operator shall maintain records of the duration of start-up, shutdown, and refractory curing periods. [District Rule 4320] Federally Enforceable Through Title V Permit
26. 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 and 4306] Federally Enforceable Through Title V Permit
27. 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 and 4306] Federally Enforceable Through Title V Permit
28. 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. For the purposes of permittee-performed alternate monitoring, emissions measurements may be performed at any time after the unit reaches conditions representative of normal operation. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
29. For each steam generator site downstream of H₂S scavenger chemical injection points, permittee shall monitor sulfur content of the gas prior to incineration in affected steam generators on a daily basis utilizing Draeger tubes calibrated for existing sulfur species or other District-approved fuel sulfur detection method(s) or device(s). If compliance with fuel sulfur content limit(s) for the affected steam generators is demonstrated for 5 consecutive days, then the monitoring frequency shall be weekly. [District Rule 2201] Federally Enforceable Through Title V Permit
30. Compliance with fuel sulfur limit(s) can be demonstrated either by monitoring sulfur content at location(s) after all fuel sources are combined prior to incineration, or by monitoring the sulfur content and volume of each fuel source and performing mass balance calculations. Records of monitoring locations, detected sulfur concentrations, and mass balance calculations, if necessary, shall be maintained and kept onsite and made readily available for District inspection upon request. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
31. 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 (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months (no more than 30 days before or after the required 36-month source test date). 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 and 4306] 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.

32. Source testing to measure NO_x and CO emissions from this unit shall be conducted within 60 days of initial operation under this ATC. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
33. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
34. 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. 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
35. 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 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SO_x (lb/MMBtu) - ARB Method 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D4468, D3246, D3246, D4084 or double GC for H₂S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rule 1081, and 4305, 6.2] Federally Enforceable Through Title V Permit
36. 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
37. All records shall be maintained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit
38. Formerly S-1511-47

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

DRAFT

ATTACHMENT B

Authority to Construct
S-1547-722-19



AUTHORITY TO CONSTRUCT

PERMIT NO: S-1547-722-19

ISSUANCE DATE: 07/26/2010

LEGAL OWNER OR OPERATOR: AERA ENERGY LLC
MAILING ADDRESS: PO BOX 11164
BAKERSFIELD, CA 93389-1164

LOCATION: HEAVY OIL WESTERN STATIONARY SOURCE
KERN COUNTY, CA

SECTION: SW01 **TOWNSHIP:** 29S **RANGE:** 21E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 62.5 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH A COEN MODEL #QLN-ULN 3.2 LOW-NOX BURNER AND FLUE GAS RECIRCULATION (FGR) (#1-1C, BELRIDGE): DESIGNATE AS A RULE 4306 COMPLIANT DORMANT EMISSIONS UNIT

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520]
2. No modification to this unit shall be performed without an Authority to Construct (ATC) for such modifications, except for changes specified in the conditions below. [District Rule 2201]
3. The fuel supply line shall be physically disconnected from this unit. [District Rule 4306]
4. Operator shall notify the District at least seven (7) calendar days prior to recommencing operation of this dormant emissions unit. [District Rule 4306]
5. When designated as a dormant emissions unit, the permittee shall not be required to perform source testing or monitoring requirements otherwise required by this permit. [District Rule 4306]
6. A source test to demonstrate compliance with the indicated emission limits shall be performed within 60 days of recommencing operation of this unit. [District Rule 4306]
7. This unit may not be operated after the applicable compliance schedule from Rule 4320, unless a valid ATC is implemented that approves the changes allowing this unit to comply with the applicable requirements of Rule 4320. [District Rule 4320]

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

COPY

DAVID WARNER, Director of Permit Services

S-1547-722-19 : Sep 11 2012 8:49AM -- ROEDERS : Joint Inspection NOT Required

8. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Last Amended December 16, 1993). [District Rule 1081, and County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 110 (Madera)]
9. Copies of all fuel invoices showing quantity and delivery points of gas delivered and copies of quality terms of gas delivery contracts shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.3.2]
10. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.5.2]
11. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2520, 9.4.2]
12. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6; or EPA Method 6B; or EPA Method 8; or ARB Methods 8 or 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by double GC for H₂S and mercaptans performed in the laboratory and EPA Method 19 to calculate emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.4.2]
13. If the unit is fired on noncertified gaseous fuel and compliance with SOx 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 D 1072, D 4468, D 4084, D3246 or grab sample analysis by double GC for H₂S and mercaptans performed in the laboratory. [District Rule 2520, 9.4.2; 4305, 6.2.1, and 4351, 6.2.1]
14. 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 D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.4.2; 4305, 6.2.1; and 4351, 6.2.1]
15. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), 110 (Madera) 402 (Madera), 404 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 405 (Madera), 408 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 407.2 (Kern, Tulare, Kings, Stanislaus, and San Joaquin), and 408.2 (Merced). A permit shield is granted from these requirements. [District Rule 2520, 13.2]
16. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements of SJVUAPCD Rules 4201 (Amended December 17, 1992), 4301 (Amended December 17, 1992), 4406 (Amended December 17, 1992, and Rule 4801 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2]
17. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of 40 CFR 60, Subpart Dc (except 60.44c(g) and (h) and 60.48c). A permit shield is granted from these requirements. [District Rule 2520, 13.2]
18. This unit has not been used to produce electricity for sale in 1985 or on or after November 15, 1990. Therefore, the requirements of 40 CFR 72.6(b) do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2]
19. Steam generator shall be operated at no greater than 1,466.7 MMBtu h/hv/day heat input. [District Rule 2201]
20. Permittee shall maintain records of higher heating value and daily quantity of natural gas burned in this steam generator. [District Rule 2201]
21. Natural gas fuel sulfur content shall not exceed 0.75 gr S/100 scf. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

22. Emission rates, except during startup, shutdown, and refractory curing, shall not exceed any of the following limits: PM10: 0.005 lb/MMBtu, SO_x (as SO₂): 0.002 lb/MMBtu, VOC: 0.003 lb/MMBtu, NO_x (as NO₂): 0.018 lb/MMBtu or 15 ppmv @ 3% O₂, or CO: 0.030 lb/MMBtu or 40 ppmv @ 3% O₂. [District Rules 2201, 2520, 4201, 4301, 4305, 4306, 4405, 4406, 4801 and Kern County Rules 424 and 425]
23. Emission rates during startup, shutdown and refractory curing shall not exceed any of the following limits: particulate matter - 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO₂; sulfur - 200 pounds of SO₂ per hour, or 2000 ppmv as SO₂, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO₂ - 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4101, 4102, 4301, 4405, 4406, 4801 and Kern County Rules 424 and 425]
24. Emission rates shall not exceed any of the following limits: PM10: 7.3 lb/day, SO_x (as SO₂): 2.9 lb/day, VOC: 4.4 lb/day, NO_x (as NO₂): 52.8 lb/day or 9,636 lb/year, or CO: 44.0 lb/day [District Rule 2201]
25. Duration of start-up and shutdown shall not exceed 2 hours each per occurrence. [District Rule 4305 and 4306]
26. Duration of refractory curing shall not exceed 30 hours each per occurrence. Permittee shall notify the District in writing prior to refractory curing. [District Rule 2080]
27. Permittee shall maintain records of duration of each start-up and shutdown, and refractory curing, for a period of five years and make such records readily available for District inspection upon request. [District Rule 4306]
28. 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 and 4306]
29. 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 and 4306]
30. 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 and 4306]
31. 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 and 4306]
32. 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 4306. [District Rules 4305 and 4306]
33. For each steam generator site downstream of H₂S scavenger chemical injection points, permittee shall monitor sulfur content of the gas prior to incineration in affected steam generators on a daily basis utilizing Draeger tubes calibrated for existing sulfur species or other District-approved fuel sulfur detection method(s) or device(s). If compliance with fuel sulfur content limit(s) for the affected steam generators is demonstrated for 5 consecutive days, then the monitoring frequency shall be weekly. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

34. Compliance with fuel sulfur limit(s) can be demonstrated either by monitoring sulfur content at location(s) after all fuel sources are combined prior to incineration, or by monitoring the sulfur content and volume of each fuel source and performing mass balance calculations. Records of monitoring locations, detected sulfur concentrations, and mass balance calculations, if necessary, shall be maintained and kept onsite and made readily available for District inspection upon request. [District Rule 2520, 9.4.2]
35. 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 (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months (no more than 30 days before or after the required 36-month source test date). 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 and 4306]
36. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306]
37. Source testing to measure natural gas-combustion NO_x and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305 and 4306]
38. 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. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
39. 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 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SO_x (lb/MMBtu) - ARB Method 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D4468, D3246, D3246, D4084 or double GC for H₂S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rule 1081, and 4305, 6.2]
40. 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]
41. All records shall be maintained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306]
42. Formerly S-1511-47

ATTACHMENT C

Emissions Increases

There are no proposed changes in emissions associated with this project.

ATTACHMENT D

Application



RECEIVED

SEP - 7 2011

SJVAPCD
Southern Region

September 6, 2011

San Joaquin Valley APCD
1990 East Gettysburg Avenue
Fresno, CA 93726-0244

ATTN: Manager, Permit Services

RE: Title V PTO Application – Make Steam Generator S-1547-722 (1-1C) Dormant

Attached are completed "Application for Title V Modification" and "Title V Compliance Certification" forms to incorporate into the Title V permit the following ATC(s):

S-1547-722-19

Should you have any questions concerning this application or require additional information, do not hesitate to contact me at (661) 665-4363.

Sincerely,

A handwritten signature in black ink, appearing to read "Brent Winn", is written over a light blue horizontal line.

Brent Winn
Environmental Engineer – Belridge
Attachment(s)

San Joaquin Valley Air Pollution Control District

RECEIVED

SEP 7 2011

SJVAPCD
Southern Region

APPLICATION FOR TITLE V MODIFICATION:

- ADMINISTRATIVE AMENDMENT
- MINOR MODIFICATION
- SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: AERA ENERGY LLC	
2. MAILING ADDRESS: STREET/P.O. BOX: CITY: P.O. BOX 11164 STATE: CA 9-DIGIT ZIP CODE: 93389-1164	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: Belridge Oilfield, Heavy Oil Western Source (S-1547) CITY: SW 1/4 SECTION 1 TOWNSHIP 29S RANGE 21E	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS:	
5. EQUIPMENT FOR WHICH APPLICATION IS MADE (Include Permit Nos.): For ATC S-1547-722-19 Convert to PTO and Incorporate Operating Conditions into the Title V Permit. This ATC allows this steam generator to be designated as a dormant unit and to be re-started with 7 days' prior notice to SJVAPCD. (Use additional sheets if necessary)	
6. DO YOU REQUEST A CERTIFICATE OF CONFORMITY WITH THIS ACTION? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
7. IS THIS APPLICATION SUBMITTED AS A RESULT OF A NOV/NTC? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO NOV/NTC No.: _____	
8. SIGNATURE OF APPLICANT/CONTACT PERSON: 	TYPE OR PRINT TITLE OF APPLICANT: Environmental Engineer
9. TYPE OR PRINT NAME OF APPLICANT/CONTACT: Brent Winn	DATE:
10. FAX NUMBER: (661) 665-7437	TELEPHONE NUMBER: (661) 665-4363

FOR APCD USE ONLY:

DATE STAMP	FILING FEE RECEIVED: \$ _____ DATE PAID: _____ PROJECT NO.: S-1113986 FACILITY REGION & ID: S-1547
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TV MM

San Joaquin Valley
Unified Air Pollution Control District

RECEIVED
SEP - 7 2011
SJVAPCD
Southern Region

TITLE V COMPLIANCE CERTIFICATION FORM

Convert steam generator S-1547-722 (1-1C) to dormant status

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: Aera Energy LLC	FACILITY ID: S-1547
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: Aera Energy LLC	
3. Agent to the Owner: N/A	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial each circle for confirmation):

- Based on information and belief formed after reasonable inquiry, the emission units identified in this application will continue to comply with the applicable federal requirement(s) which the emission units are in compliance.
- Based on information and belief formed after reasonable inquiry, the emission units identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:



Signature of Responsible Official

9-6-11

Date

J.D. Story

Name of Responsible Official (please print)

Process Supervisor

Title of Responsible Official (please print)

ATTACHMENT E

Previous Title V Operating Permit
S-1547-722-23

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-722-23

EXPIRATION DATE: 05/31/2016

SECTION: SW01 **TOWNSHIP:** 29S **RANGE:** 21E

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH A GIDEON LOW ULTRA LOW NOX BURNER AND FLUE GAS RECIRCULATION (FGR) (#1-1C, BELBRIDGE)

PERMIT UNIT REQUIREMENTS

1. Copies of all fuel invoices showing quantity and delivery points of gas delivered and copies of quality terms of gas delivery contracts shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
2. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit
3. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
4. 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 D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.4.2; 4305, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit
5. The operator shall demonstrate compliance with this unit's sulfur compound exhaust concentration limit(s) using one of the following: test the sulfur content of each fuel source, or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rules 2520, 9.4.2, 4301, 5.2.1 and 4801.3.1] Federally Enforceable Through Title V Permit
6. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of 40 CFR 60, Subpart Dc (except 60.44c(g) and (h) and 60.48c). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
7. Steam generator shall be operated at no greater than 1,466.7 MMBtu hhw/day heat input. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Permittee shall maintain records of higher heating value and daily quantity of natural gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Natural gas fuel sulfur content shall not exceed 0.75 gr S/100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The total gas fired in this unit, on a monthly volume basis, shall be less than 50% PUC-quality natural gas (as defined by Rule 4320). [District Rule 4320] 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.

11. The permittee shall maintain monthly records of the volume of PUC quality natural gas (as defined in Rule 4320) 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
12. 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, or ASTM D6228; and methane content: ASTM D1945. [District Rule 4320] Federally Enforceable Through Title V Permit
13. Emission rates, except during startup, shutdown, and refractory curing, shall not exceed any of the following limits: PM₁₀: 0.005 lb/MMBtu, SO_x (as SO₂): 0.002 lb/MMBtu, VOC: 0.003 lb/MMBtu, NO_x (as NO₂): 0.014 lb/MMBtu or 12 ppmv @ 3% O₂, or CO: 0.030 lb/MMBtu or 40 ppmv @ 3% O₂. [District Rules 2201, 2520, 4201, 4301, 4305, 4306, 4405, 4406, 4320, 4801 and Kern County Rules 424 and 425] Federally Enforceable Through Title V Permit
14. Emission rates during startup, shutdown and refractory curing shall not exceed any of the following limits: particulate matter - 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO₂; sulfur - 200 pounds of SO₂ per hour, or 2000 ppmv as SO₂, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO₂ - 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4101, 4102, 4301, 4405, 4406, 4801 and Kern County Rules 424 and 425] Federally Enforceable Through Title V Permit
15. Emission rates shall not exceed any of the following limits: PM₁₀: 7.3 lb/day, SO_x (as SO₂): 2.9 lb/day, VOC: 4.4 lb/day, NO_x (as NO₂): 52.8 lb/day or 7495 lb/year, or CO: 44.0 lb/day [District Rule 2201] Federally Enforceable Through Title V Permit
16. During a "shakedown" period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO_x emission shall not exceed 15 ppmvd NO_x @ 3% O₂ or 0.018 lb-NO_x/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline selected for this unit. Permittee shall maintain a record of the date of initial operation for at least 5 years. [District Rule 4320] Federally Enforceable Through Title V Permit
17. 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 and 4306] Federally Enforceable Through Title V Permit
18. 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 and 4306] Federally Enforceable Through Title V Permit
19. Duration of start-up and shutdown (as defined in Rule 4320) shall not exceed 2 hours each per occurrence. Refractory curing period is defined as a maintenance-based reduced-load period of time during which a unit is brought from a shutdown status to staged rates of firing for the sole purpose of curing new refractory lining of the unit, and shall not exceed 30 hours per occurrence. The operator shall maintain records of the duration of start-up, shutdown, and refractory curing periods. [District Rule 4320] 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.

20. 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 and 4306] Federally Enforceable Through Title V Permit
21. 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 and 4306] Federally Enforceable Through Title V Permit
22. 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. For the purposes of permittee-performed alternate monitoring, emissions measurements may be performed at any time after the unit reaches conditions representative of normal operation. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
23. For each steam generator site downstream of H₂S scavenger chemical injection points, permittee shall monitor sulfur content of the gas prior to incineration in affected steam generators on a daily basis utilizing Draeger tubes calibrated for existing sulfur species or other District-approved fuel sulfur detection method(s) or device(s). If compliance with fuel sulfur content limit(s) for the affected steam generators is demonstrated for 5 consecutive days, then the monitoring frequency shall be weekly. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Compliance with fuel sulfur limit(s) can be demonstrated either by monitoring sulfur content at location(s) after all fuel sources are combined prior to incineration, or by monitoring the sulfur content and volume of each fuel source and performing mass balance calculations. Records of monitoring locations, detected sulfur concentrations, and mass balance calculations, if necessary, shall be maintained and kept onsite and made readily available for District inspection upon request. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
25. 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 (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months (no more than 30 days before or after the required 36-month source test date). 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 and 4306] Federally Enforceable Through Title V Permit
26. Source testing to measure NO_x and CO emissions from this unit shall be conducted within 60 days of initial operation under this ATC. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
27. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
28. 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. 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
29. 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 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SO_x (lb/MMBtu) - ARB Method 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D4468, D3246, D3246, D4084 or double GC for H₂S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rule 1081, and 4305, 6.2] 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.

30. 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
31. All records shall be maintained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit
32. Formerly S-1511-47

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