



**Santa Barbara County
Air Pollution Control District**

MAY 06 2011

Mr. Gerardo Rios
USEPA – Permits Office (AIR 3)
75 Hawthorne Street
San Francisco, CA 94105

FID: 03202
Permit: P 12913
SSID: 01073

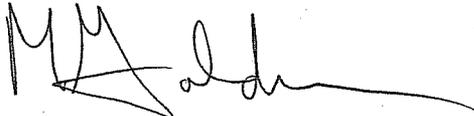
Re: Proposed Minor Permit Modifications to E & B Natural Resources Gas Plant 10 Part 70/APCD
PTO 9136-R6

Dear Mr. Rios:

This letter transmits Proposed Minor Permit Modification Permit to Operate (PTO) 12913 for modifications to Part 70/APCD PTO 9136-R6. Included with the proposed permit is a copy of the application submitted by the applicant for this modification. We plan to issue this minor permit modification as final after June 10, 2011 provided your office has not objected to such issuance during this time interval.

If you have any questions, please contact Stefanie M. Boehme of my staff at (805) 961-8810.

Sincerely,



Michael Goldman, Manager
Engineering & Compliance Division

enc: Proposed PTO 12913
Application forms for Minor Modifications to E & B Natural Resources Gas Plant 10

cc: Gas Plant 10 Project File SC
ECD Chron File
Ben Ellenberger (cover letter only)
Stefanie Boehme (cover letter only)

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Part 70 Minor Modification 12913
and
Permit to Operate 12913

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EQUIPMENT OWNER/OPERATOR:

E&B Natural Resources Mgt. Corp.

300500

EQUIPMENT LOCATION:

Gas Plant 10, South Cuyama, California

STATIONARY SOURCE/FACILITY:

E&B - South Cuyama
Gas Plant 10

SSID: 01073
FID: 03202

EQUIPMENT DESCRIPTION:

The equipment subject to this permit is listed in the table at the end of this permit.

PROJECT/PROCESS DESCRIPTION:

Produced gas from the South Cuyama Unit is metered prior to being processed through one of four skid mounted gas adsorbtion towers. Each tower contains four beds of catalyst that are used to lower the nitrogen content of the produced gas to the gas purchaser's standards. Three gas streams exit the adsorbers: 1) A fuel gas stream is removed from the adsorber with a vacuum compressor, piped through a 3,000 gallon surge tank, and then compressed and used as fuel at the E&B South Cuyama stationary source. 2) A sales gas stream with a nitrogen content of 3% exits the adsorbtion towers and goes directly to a sales gas compressor and sent to the sales pipeline. 3) A recycle stream passes through a 3,000 gallon recycle tank prior to being sent by the recycle blower to the Gas Plant 10 inlet. Nitrogen from the system goes to a waste gas compressor and is reinjected into producing formation. The only emissions are associated with fugitive components.

CONDITIONS:

9.A Standard Administrative Conditions

The following federally-enforceable administrative permit conditions apply to Gas Plant 10:

A.1 Compliance with Permit Conditions:

- (a) The permittee shall comply with all permit conditions in Sections 9.A, 9.B and C.
- (b) This permit does not convey property rights or exclusive privilege of any sort.
- (c) Non-compliance with any permit condition is grounds for permit termination, revocation and re-issuance, modification, enforcement action, or denial of permit renewal. Any permit non-compliance constitutes a violation of the Clean Air Act and its implementing regulations or of District Rules or of both, as applicable.
- (d) The permittee shall not use the "need to halt or reduce a permitted activity in order to maintain compliance" as a defense for noncompliance with any permit condition.
- (e) A pending permit action or notification of anticipated noncompliance does not stay any permit condition.
- (f) Within a reasonable time period, the permittee shall furnish any information requested by the Control Officer, in writing, for the purpose of determining:
 - (i) compliance with the permit, or
 - (ii) whether or not cause exists to modify, revoke and reissue, or terminate a permit or for an enforcement action.

[*Re: 40 CFR Part 70.5.(a)(6)(iii), District Rules 1303.D.1.j, 1303.D.1.n, 1303.D.1.l, 1303.D.1.k, 1303.D.1.o*]

A.2 Emergency Provisions: The permittee shall comply with the requirements of the District, Rule 505 (Upset/Breakdown rule) and/or District Rule 1303.F, whichever is applicable to the emergency situation. In order to maintain an affirmative defense under Rule 1303.F, the permittee shall provide the District, in writing, a "notice of emergency" within 2 days of the emergency. The "notice of emergency" shall contain the information/documentation listed in Sections (1) through (5) of Rule 1303.F. [*Re: 40 CFR 70.6(g), District Rule 1303.F*]

A.3 Compliance Plan:

- (a) The permittee shall comply with all federally-enforceable requirements that become applicable during the permit term, in a timely manner.

- (b) For all applicable equipment, the permittee shall implement and comply with any specific compliance plan required under any federally-enforceable rules or standards.

[*Re: District Rule 1302.D.2*]

- A.4 **Right of Entry:** The Regional Administrator of USEPA, the Control Officer, or their authorized representatives, upon the presentation of credentials, shall be permitted to enter upon the premises where a Part 70 Source is located or where records must be kept:
 - (a) To inspect at reasonable times the stationary source, including monitoring and control equipment, work practices, operations, and emission-related activity;
 - (b) To inspect and duplicate, at reasonable times, records required by this Permit to Operate;
 - (c) To sample substances or monitor emissions from the source or assess other parameters to assure compliance with the permit or applicable requirements, at reasonable times.

[*Re: District Rule 1303.D.2.a*]

- A.5 **Severability:** The provisions of this Permit to Operate are severable and if any provision of this Permit to Operate is held invalid, the remainder of this Permit to Operate shall not be affected thereby. [*Re: District Rules 103, 1303.D.1.i*]
- A.6 **Payment of Fees:** The permittee shall reimburse the District for all its Part 70 permit processing and compliance monitoring expenses for the stationary source on a timely basis. Failure to reimburse on a timely basis shall be a violation of this permit and of applicable requirements and can result in forfeiture of the Part 70 permit. Operation without a Part 70 permit subjects the source to potential enforcement action by the District and the USEPA pursuant to section 502(a) of the Clean Air Act. [*Re: District Rules 1303.D.1.p, 1304.D.11 and 40 CFR 70.6(a)(7)*]
- A.7 **Prompt Reporting of Deviations:** The permittee shall submit a written report to the District documenting each and every deviation from the requirements of this permit or any applicable federal requirements within 7 days after discovery of the violation, but not later than 180-days after the date of occurrence. The report shall clearly document 1) the probable cause and extent of the deviation 2) equipment involved, 3) the quantity of excess pollutant emissions, if any, and 4) actions taken to correct the deviation. The requirements of this condition shall not apply to deviations reported to District in accordance with Rule 505. *Breakdown Conditions*, or Rule 1303.F *Emergency Provisions*. [District Rule 1303.D.1, 40 CFR 70.6(a) (3)]
- A.8 **Federally-Enforceable Conditions:** Each federally-enforceable condition in this permit shall be enforceable by the USEPA and members of the public. None of the conditions in the District-only enforceable section of this permit are federally-enforceable or subject to the public/USEPA review [*Re: CAAA, § 502(b)(6), 40 CFR 70.6(b)*]
- A.9 **Reporting Requirements/Compliance Certification:** The permittee shall submit compliance certification reports to both the USEPA and the Control Officer every six-months. These reports shall be submitted on District forms and shall identify each applicable requirement/condition of

the permit, the compliance status with each requirement/condition, the monitoring methods used to determine compliance, whether the compliance was continuous or intermittent, and include detailed information on the occurrence and correction of any deviations (excluding emergency upsets) from permit requirement. The reporting periods shall be each half of the calendar year, e.g., January through June for the first half of the year. These reports shall be submitted by September 1st and March 1st, respectively, each year. Supporting monitoring data shall be submitted in accordance with the "Semi-Annual Monitoring/Compliance Verification Report" condition in section 9.C. The permittee shall include a written statement from the responsible official, which certifies the truth, accuracy, and completeness of the reports. [Re: District Rules 1303.D.1, 1302.D.3, 1303.2.c]

A.10 **Recordkeeping Requirements:** Records of required monitoring information that includes the following:

- (a) The date, place as defined in the permit, and time of sampling or measurements;
- (b) The date(s) analyses were performed;
- (c) The company or entity that performed the analyses;
- (d) The analytical techniques or methods used;
- (e) The results of such analyses; and
- (f) The operating conditions as existing at the time of sampling or measurement;

The records (electronic or hard copy), as well as all supporting information including calibration and maintenance records, shall be maintained for a minimum of five (5) years from date of initial entry by the permittee and shall be made available to the District upon request. [Re: District Rule 1303.D.1.f, 40CFR70.6(a)(3)(ii)(A)]

A.11 **Conditions for Permit Reopening:** The permit shall be reopened and revised for cause under any of the following circumstances:

- (a) **Additional Requirements:** If additional applicable requirements (e.g., NSPS or MACT) become applicable to the source which has an unexpired permit term of three (3) or more years, the permit shall be reopened. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. However, no such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended. All such re-openings shall be initiated only after a 30-day notice of intent to reopen the permit has been provided to the permittee, except that a shorter notice may be given in case of an emergency.
- (b) **Inaccurate Permit Provisions:** If the District or the USEPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit, the permit shall be reopened. Such re-openings shall be made as soon as practicable.
- (c) **Applicable Requirement:** If the District or the USEPA determines that the permit must be revised or revoked to assure compliance with any applicable requirement including a

federally-enforceable requirement, the permit shall be reopened. Such re-openings shall be made as soon as practicable.

Administrative procedures to reopen and revise/revoke/reissue a permit shall follow the same procedures as apply to initial permit issuance. Re-openings shall affect only those parts of the permit for which cause to reopen exist.

If a permit is reopened, the expiration date does not change. Thus, if the permit is reopened, and revised, then it will be reissued with the expiration date applicable to the re-opened permit. [Re: 40 CFR 70.7(f)(1)-(3), 40 CFR 70.6(a)(2)]

9.B. Generic Conditions

The generic conditions listed below apply to all emission units, regardless of their category or emission rates. These conditions are federally-enforceable. Compliance with these requirements is discussed in Section 3. In case of a discrepancy between the wording of a condition and the applicable federal or District rule(s), the wording of the rule shall control.

- B.1 **Circumvention (Rule 301):** A person shall not build, erect, install, or use any article, machine, equipment or other contrivance, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission which would otherwise constitute a violation of Division 26 (Air Resources) of the Health and Safety Code of the State of California or of these Rules and Regulations. This Rule shall not apply to cases in which the only violation involved is of Section 41700 of the Health and Safety Code of the State of California, or of District Rule 303. [Re: *District Rule 301*]
- B.2 **Nuisance (Rule 303):** No pollutant emissions from any equipment at this facility shall create nuisance conditions. No operations shall endanger health, safety or comfort, nor shall they damage any property or business. [Re: *District Rule 303*]

9.C *Equipment Specific Conditions*

This section contains non-generic federally-enforceable conditions, including emissions and operations limits, monitoring, recordkeeping, and reporting for each specific equipment group. This section may also contain other non-generic conditions. The following conditions supersede conditions C.2 and C.4 of Part-70/PTO 9136-R5 issued June 2, 2008. All other permit conditions remain unchanged and in full force.

C.2 **Fugitive Hydrocarbon Emissions Components:** The following equipment is included in this emissions unit category:

Device #	Equipment Item Name, Number of Component Leak Paths/Item
	<i>Gas/Light Liquid Service CLPs</i>
008323	Valves: 851 clps
008325	Valves (unsafe to monitor): 15 clps
008327	Connections: 6,414 clps
008328	Connections (unsafe to monitor): 62 clps
008329	Compressor Seals (open w/o vapor recovery): 6 clps
008330	Compressor Seals (sealed w/ vapor recovery): 18 clps
008331	Pump Seals 4 clps
008332	Relief Valves (open) 27 clps
	<i>Oil Service CLPs</i>
105000	Valves: 90 clps
105001	Connections: 80 clps

- (a) **Emission Limits:** The fugitive emissions are subject to New Source Review under ATC 7214A, ATC 10914 and ATC 12913. Thus emissions from this equipment are federally-enforceable. The emissions are listed in Table 5.1-3 and 5.2. Compliance with these limits is met when E&B complies with the provisions of Subpart KKK and Rule 331.
- (b) **Operational Limits:** Operation of the equipment listed in this section shall conform to the requirements listed in District Rule 331.D and E. Compliance with these limits shall be assessed through compliance with the monitoring, recordkeeping and reporting conditions in this permit. In addition E&B shall meet the following requirement:

No later than 30-days after the issuance of this permit, E&B shall submit an updated *Inspection and Maintenance Plan* to the District for review and approval. The updated plan shall include the modifications included in this permit and shall include a description of the identification system required by Rule 331.G.1 including the physical identification method required by 331.G.1.a., the diagrams required by 331.G.1.b, and the component list required by 331.G.1.c. All piping, valves, and fittings must be vapor tight. E&B shall implement the requirements of District Rule 331 and adhere to the January 1993 (and subsequent updates) *Inspection and Maintenance Plan* for control of fugitive reactive organic compound emissions.

- (c) **Monitoring:** The equipment listed in this section are subject to all the monitoring requirements listed in NSPS Subpart KKK and in District Rule 331.F. The test methods in Subpart KKK and Rule 331.H shall be used, when applicable.
- (d) **Recordkeeping:** All inspection and repair records shall be retained at the source for a minimum of five years. The equipment listed in this section are subject to all the recordkeeping requirements listed in NSPS Subpart KKK and District Rule 331.G.
- (e) **Reporting:** On a semi-annual basis, a report detailing the previous six-month's activities shall be provided to the District. The report must list all data required by the *Semi-Annual Monitoring/Compliance Verification Reports* condition of this permit. [Re: 40 CFR 60, Subpart KKK, 40 CFR 70.6(a)(3), District ATC 7214, ATC 10914, ATC 12913 and District Rule 331]

C.4 Semi-Annual Monitoring/Compliance Verification Reports: E&B shall submit a report to the District every six-months to verify compliance with the emission limits and other requirements of this permit. The reporting periods shall be each half of the calendar year, e.g., January through June for the first half of the year. These reports shall be submitted by September 1st and March 1st, respectively, each year, and shall be in a format approved by the District. All logs and other basic source data not included in the report shall be available to the District upon request. The second report shall also include an annual report for the prior four quarters. The report shall include the following information:

(b) Fugitive Hydrocarbon Emissions

- (i) All the reporting requirements listed in NSPS Subpart KKK and District Rule 331.G, and shall include:
 - Inspection summary.
 - Record of leaking components.
 - Record of leaks from critical components.
 - Record of leaks from components that incur five repair actions within a continuous 12-month period.
 - Record of component repair actions including dates of component re-inspections.

9.D District-Only Conditions

The following section lists permit conditions that are not enforceable by the USEPA or the public. However, these conditions are enforceable by the District and the State of California. These conditions are issued pursuant to District Rule 206 (*Conditional Approval of Authority to Construct or Permit to Operate*), which states that the Control Officer may issue an operating permit subject to specified conditions. Permit conditions have been determined as being necessary for this permit to ensure that operation of the facility complies with all applicable local and state air quality rules, regulations and laws. Failure to comply with any condition specified pursuant to the provisions of Rule 206 shall be a violation of that rule, this permit, as well as any applicable section of the California Health & Safety Code.

Part 70 Minor Modification 12913 / Permit to Operate 12913

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D.1 **Permit Activation.** All aspects of this permit are enforceable by the District and the State of California upon the issuance date stamped below. The Part 70 aspects of this permit are not final until:

- (a) The USEPA has either provided written comments to the District and these comments require no modification to this permit or the USEPA does not provide written comments during their review period. The District will issue a letter stating that this permit is a final Part 70 permit. The effective date that this permit will be considered a final Part 70 permit will be the date stamped on the District's letter.
- (b) After the USEPA has provided the District written comments that require a modification to this permit, the District will modify this permit to address the USEPA's comments and issue the Part 70 permit as final. The re-issued permit will supersede this permit in its entirety.



AIR POLLUTION CONTROL OFFICER

MAY 06 2011

DATE

Attachments:

- Table 1
- Table 5.1-1 – Equipment Description
- Table 5.1-2 – Emission Factors
- Table 5.1-3 – Hourly & Daily Emissions
- Table 5.1-4 – Quarterly & Annual Emissions
- Table 5.2 – Total Permitted Emissions
- Table 5.3 – Federal Potential to Emit
- Permit Equipment List
- Permit Evaluation for Permit to Operate 12913

Notes:

- Reevaluation Due Date: April 2014
- This permit supersedes ATC 12913

Table 1
Permitted Emissions

Equipment Category	NOx	ROC	CO	SOx	PM	PM10
Nitrogen Removal Unit						
lbs/day	0.00	11.35	0.00	0.00	0.00	0.00
tons/year	0.00	2.07	0.00	0.00	0.00	0.00

Table 5.1-1
Permit to Operate 12913
E&B Gas Plant 10
Equipment Description

Equipment Category	Description	Device ID#	Usage Data		Units	Service Load	Hours Per				
			Parameter	Capacity			day	qtr	year		
Fugitive Hydrocarbon Components - Gas/Condensate Service											
	Valves	008323	-	-	851 cip's	gas	1	24	2,190	8,760	
	Valves (unsafe to monitor)	008325	-	-	15 cip's	gas	1	24	2,190	8,760	
	Connections	008327	-	-	6,414 cip's	gas	1	24	2,190	8,760	
	Connections (unsafe to monitor)	008328	-	-	62 cip's	gas	1	24	2,190	8,760	
	Compressor seals (to atm)	008329	-	-	6 cip's	gas	1	24	2,190	8,760	
	Compressor seals (sealed)	008330	-	-	18 cip's	gas	1	24	2,190	8,760	
	Pump Seals	008331	-	-	4 cip's	gas	1	24	2,190	8,760	
	Relief Valves (to atm)	008332	-	-	27 cip's	gas	1	24	2,190	8,760	
Fugitive Hydrocarbon Components - Oil Service											
	Valves	105000	-	-	90 cip's	oil	1	24	2,190	8,760	
	Connections	105001	-	-	80 cip's	oil	1	24	2,190	8,760	
External Combustion Equipment											
	Glycol Reboiler: H-101.	008333	%S	MMscf	0.675	MMBtu/hr	na	1	24	2,190	8,760
	Glycol Reboiler.	008334	0.001	5.63	0.175	MMBtu/hr	na	1	24	2,190	8,760
	Amine Reboiler	105021	0.001	0.001	0.650	MMBtu/hr	na	1	24	2,190	8,760
Flare											
	Planned Flaring ¹	101060	0.0796	69.88	262.5	MMBtu/hr	na	1	na	279.5	
	Unplanned/Emergency Flaring	101060	0.0796	0.00	262.5	MMBtu/hr	na	0	0	0	

1. The volume of gas flared is consistent with E&B's Flare Minimization Plan.

**Table 5.1-2
Permit to Operate 12913
E&B Gas Plant 10
Emission Factors**

Equipment Category	Description	Device ID#	Emission Factors							Reference	
			NOx	ROC	CO	SOx	PM	PM10	Units		
Fugitive Hydrocarbon Components - Gas/Condensate Service											
	Valves	008323		0.080						lb/day/clp	C
	Valves (unsafe to monitor)	008325		0.402						lb/day/clp	C
	Connections	008327		0.005						lb/day/clp	C
	Connections (unsafe to monitor)	008328		0.025						lb/day/clp	C
	Compressor seals (open)	008329		0.432						lb/day/clp	C
	Compressor seals (sealed)	008330		0.000						lb/day/clp	C
	Pump Seals	008331		0.521						lb/day/clp	C
	Relief Valves (open)	008332		0.139						lb/day/clp	C
Fugitive Hydrocarbon Components - Oil Service											
	Valves (Oil Service)	105000		0.028						lb/day/clp	C
	Connections (Oil Service)	105001		0.005						lb/day/clp	C
External Combustion Equipment											
	Glycol Reboiler: H-101.	008333	0.100	0.0053	0.002	0.00171	0.012	0.012	0.012	lb/MMBtu	A
	Glycol Reboiler.	008334	0.094	0.0073	0.040	0.00171	0.011	0.011	0.011	lb/MMBtu	A
	Amine Reboiler	105021	0.098	0.0054	0.082	0.0137	0.008	0.008	0.008	lb/MMBtu	A
Flare											
	Planned Flaring	101060	0.068	0.0057	0.370	0.1362	0.02	0.02	0.02	lb/MMBtu	B
	Unplanned/Emergency Flaring	101060	0.068	0.0057	0.370	0.1362	0.02	0.02	0.02	lb/MMBtu	B

**Table 5.1-3
Permit to Operate 12913
E&B Gas Plant 10
Hourly and Daily Emissions**

Equipment Category	Emissions Unit	Device ID #	NOx lb/hr	NOx lb/day	ROC lb/hr	ROC lb/day	CO lb/hr	CO lb/day	SOx lb/hr	SOx lb/day	PM lb/hr	PM lb/day	PM ₁₀ lb/hr	PM ₁₀ lb/day	Feasible Enforceability and its Basis
Fugitive Hydrocarbon Components - Gas/Condensate Service															
	Valves	008323	-	-	2.85	68.43	-	-	-	-	-	-	-	-	FE
	Valves (unsafe to monitor)	008325	-	-	0.25	6.03	-	-	-	-	-	-	-	-	FE ATC
	Connections	008327	-	-	1.33	31.99	-	-	-	-	-	-	-	-	FE 7214A
	Connections (unsafe to monitor)	008328	-	-	0.06	1.55	-	-	-	-	-	-	-	-	FE
	Compressor seals (open)	008329	-	-	0.11	2.59	-	-	-	-	-	-	-	-	FE
	Compressor seals (sealed)	008330	-	-	0.00	0.00	-	-	-	-	-	-	-	-	FE
	Pump Seals	008331	-	-	0.09	2.09	-	-	-	-	-	-	-	-	FE
	Relief Valves (open)	008332	-	-	0.16	3.76	-	-	-	-	-	-	-	-	FE
Fugitive Hydrocarbon Components - Oil Service															
	Valves (Oil Service)	105000	-	-	0.11	2.56	-	-	-	-	-	-	-	-	FE ATC 10914
	Connections (Oil Service)	105001	-	-	0.02	0.37	-	-	-	-	-	-	-	-	FE ATC 10914
External Combustion Equipment															
	Glycol Reboiler: H-101.	008333	0.07	1.68	0.01	0.20	0.01	0.24	0.01	0.20	0.01	0.24	0.01	0.24	FE
	Glycol Reboiler.	008334	0.02	0.39	0.01	0.24	0.01	0.17	0.01	0.24	0.01	0.24	0.01	0.24	FE
	Amine Reboiler	105021	0.06	1.53	0.00	0.02	0.05	1.29	0.01	0.21	0.00	0.12	0.00	0.12	FE ATC 10914
Flare															
	Planned Flaring ¹	101060	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	A
	Unplanned/Emergency Flaring	101060	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	A

1. Flaring is on an event basis, therefore emission limits are only given in terms of tons per year.

Table 5.1-4
Permit to Operate 12913
E&B Gas Plant 10
Quarterly and Annual Emissions

Equipment Category	Emissions Unit	Device ID#	NOx		ROC		CO		SOx		PM		PM10		Federal Enforceability and its Basis
			TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY	
Fugitive Hydrocarbon Components - Gas/Condensate Service															
	Valves	008323	-	-	3.12	12.49	-	-	-	-	-	-	-	-	FE
	Valves (unsafe to monitor)	008325	-	-	0.28	1.10	-	-	-	-	-	-	-	-	FE ATC
	Connections	008327	-	-	1.46	5.84	-	-	-	-	-	-	-	-	FE 7214A
	Connections (unsafe to monitor)	008328	-	-	0.07	0.28	-	-	-	-	-	-	-	-	FE
	Compressor seals (open)	008329	-	-	0.12	0.47	-	-	-	-	-	-	-	-	FE
	Compressor seals (sealed)	008330	-	-	--	--	-	-	-	-	-	-	-	-	FE
	Pump Seals	008331	-	-	0.10	0.38	-	-	-	-	-	-	-	-	FE
	Relief Valves (open)	008332	-	-	0.17	0.69	-	-	-	-	-	-	-	-	FE
Fugitive Hydrocarbon Components - Oil Service															
	Valves (Oil Service)	105000	-	-	0.12	0.47	-	-	-	-	-	-	-	-	FE ATC 10914
	Connections (Oil Service)	105001	-	-	0.02	0.07	-	-	-	-	-	-	-	-	FE ATC 10914
External Combustion Equipment															
	Glycol Reboiler: H-101.	008333	0.08	0.31	0.00	0.01	0.01	0.04	0.01	0.04	0.01	0.04	0.01	0.04	FE
	Glycol Reboiler.	008334	0.01	0.04	0.01	0.04	0.01	0.04	0.01	0.04	0.01	0.04	0.01	0.04	FE
	Amine Reboiler	105021	0.07	0.28	0.01	0.02	0.06	0.23	0.01	0.04	0.01	0.02	0.01	0.02	FE ATC 10914
Flare															
	Planned Flaring ¹	101060	NA	2.49	NA	NA	0.21	NA	13.57	NA	5.00	NA	0.73	NA	A
	Unplanned/Emergency Flaring	101060	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	A

1. Flaring is on an event basis, therefore emission limits are only given in terms of tons per year.

Table 5.2
Permit to Operate 12913
Total Permitted Facility Emissions

A. Hourly (lb/hr)

Equipment Category	NOx	ROC	CO	SOx	PM	PM10
Fugitives	-	4.97	-	-	-	-
Boilers	0.15	0.02	0.07	0.03	0.02	0.02
Flare	-	-	-	-	-	-
Totals	0.15	4.99	0.07	0.03	0.02	0.02

B. Daily (lb/day)

Equipment Category	NOx	ROC	CO	SOx	PM	PM10
Fugitives	-	119.36	-	-	-	-
Boilers	3.60	0.46	1.70	0.65	0.60	0.60
Flare	-	-	-	-	-	-
Totals	3.60	119.82	1.70	0.65	0.60	0.60

C. Quarterly (Tons/Qtr)

Equipment Category	NOx	ROC	CO	SOx	PM	PM10
Fugitives	-	5.45	-	-	-	-
Boilers	0.16	0.02	0.08	0.03	0.03	0.03
Flare	-	-	-	-	-	-
Totals	0.16	5.46	0.08	0.03	0.03	0.03

D. Annual (Ton/yr)

Equipment Category	NOx	ROC	CO	SOx	PM	PM10
Fugitives	-	21.78	-	-	-	-
Boilers	0.63	0.07	0.31	0.12	0.10	0.10
Flare	2.49	0.21	13.57	5.00	0.73	0.73
Totals	3.12	22.06	13.88	5.12	0.83	0.83

Table 5.3
PTO 12913 / Part 70 Permit 9136
Federal Facility Potential to Emit

Federal PTE - Peak Annual (Ton/yr)						
Equipment Category	NOx	ROC	CO	SOx	PM	PM10
Fugitives	0.00	21.78	0.00	0.00	0.00	0.00
Boilers	0.63	0.07	0.31	0.12	0.10	0.10
Flare	2.49	0.21	13.57	5.00	0.73	0.73
Totals	3.12	22.06	13.88	5.12	0.83	0.83

Friday, March 04, 2011
Santa Barbara County APCD – Equipment List

PTO 12913 / FID: 03202 Gas Plant 10 / SSID: 01073

A PERMITTED EQUIPMENT

1 Gas Processing Unit

<i>Device ID #</i>	112423	<i>Device Name</i>	Gas Processing Unit
<i>Rated Heat Input</i>		<i>Physical Size</i>	1.00 Installation
<i>Manufacturer</i>		<i>Operator ID</i>	MG48-31010
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Nitrogen Removal Unit, Gas Plant 10		
<i>Device Description</i>	Skid mounted, equipped with four adsorbers each 42 inches in diameter by 139 inches high.		
	Flow: 1.5 MMScf/day nominal		
	Pressure: 100 psig nominal		
	Equipped with four adsorption towers.		

2 Compressors

2.1 Fuel Compressor

<i>Device ID #</i>	112425	<i>Device Name</i>	Fuel Compressor
<i>Rated Heat Input</i>		<i>Physical Size</i>	100.00 Horsepower (Electric Motor)
<i>Manufacturer</i>		<i>Operator ID</i>	MG51-47010
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Nitrogen Removal Unit, Gas Plant 10		
<i>Device Description</i>			

Equipment List for Part 70 Minor Modification 12913 / Permit to Operate 12913

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2.2 Vacuum Compressor

<i>Device ID #</i>	112427	<i>Device Name</i>	Vacuum Compressor
<i>Rated Heat Input</i>		<i>Physical Size</i>	100.00 Horsepower (Electric Motor)
<i>Manufacturer Model</i>		<i>Operator ID Serial Number</i>	MG50-41010
<i>Location Note Device Description</i>	Nitrogen Removal Unit, Gas Plant 10		

2.3 Sales Compressor

<i>Device ID #</i>	112428	<i>Device Name</i>	Sales Compressor
<i>Rated Heat Input</i>		<i>Physical Size</i>	100.00 Horsepower (Electric Motor)
<i>Manufacturer Model</i>		<i>Operator ID Serial Number</i>	MG49-51010
<i>Location Note Device Description</i>	Nitrogen Removal Unit, Gas Plant 10		

2.4 Recycle Blower

<i>Device ID #</i>	112429	<i>Device Name</i>	Recycle Blower
<i>Rated Heat Input</i>		<i>Physical Size</i>	7.50 Horsepower (Electric Motor)
<i>Manufacturer Model</i>		<i>Operator ID Serial Number</i>	
<i>Location Note Device Description</i>	Nitrogen Removal Unit, Gas Plant 10		

3 Tanks

3.1 Recycle Tank

<i>Device ID #</i>	112424	<i>Device Name</i>	Recycle Tank
<i>Rated Heat Input</i>		<i>Physical Size</i>	3000.00 Gallons
<i>Manufacturer</i>		<i>Operator ID</i>	V306
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Nitrogen Removal Unit, Gas Plant 10		
<i>Device</i>	48 inches in diameter 405 inches tall		
<i>Description</i>			

3.2 Fuel Surge Tank

<i>Device ID #</i>	112426	<i>Device Name</i>	Fuel Surge Tank
<i>Rated Heat Input</i>		<i>Physical Size</i>	3000.00 Gallons
<i>Manufacturer</i>		<i>Operator ID</i>	V359
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Nitrogen Removal Unit, Gas Plant 10		
<i>Device</i>	48 inches in diameter 405 inches tall		
<i>Description</i>			

3.3 Rep Tank 1

<i>Device ID #</i>	112430	<i>Device Name</i>	Rep Tank 1
<i>Rated Heat Input</i>		<i>Physical Size</i>	1000.00 Gallons
<i>Manufacturer</i>		<i>Operator ID</i>	V501A
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Nitrogen Removal Unit, Gas Plant 10		
<i>Device</i>	42 inches in diameter by 193 inches tall		
<i>Description</i>			

3.4 Rep Tank 2

Device ID #	112431	Device Name	Rep Tank 2
<i>Rated Heat Input</i>		<i>Physical Size</i>	1000.00 Gallons
<i>Manufacturer</i>		<i>Operator ID</i>	V501B
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Nitrogen Removal Unit, Gas Plant 10		
<i>Device</i>	42 inches in diameter by 193 inches tall		
<i>Description</i>			

3.5 Equalization Tank 1

Device ID #	112432	Device Name	Equalization Tank 1
<i>Rated Heat Input</i>		<i>Physical Size</i>	1000.00 Gallons
<i>Manufacturer</i>		<i>Operator ID</i>	V303A
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Nitrogen Removal Unit, Gas Plant 10		
<i>Device</i>	42 inches in diameter by 193 inches tall		
<i>Description</i>			

3.6 Equalization Tank 2

Device ID #	112433	Device Name	Equalization Tank 2
<i>Rated Heat Input</i>		<i>Physical Size</i>	1000.00 Gallons
<i>Manufacturer</i>		<i>Operator ID</i>	V303B
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Nitrogen Removal Unit, Gas Plant 10		
<i>Device</i>	42 inches in diameter by 193 inches tall		
<i>Description</i>			

Equipment List for Part 70 Minor Modification 12913 / Permit to Operate 12913

3.7 Purge Tank

<i>Device ID #</i>	112434	<i>Device Name</i>	Purge Tank
<i>Rated Heat Input</i>		<i>Physical Size</i>	1000.00 Gallons
<i>Manufacturer</i>		<i>Operator ID</i>	V304
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Nitrogen Removal Unit, Gas Plant 10		
<i>Device Description</i>			

4 Fugitive Hydrocarbon Components

4.1 Valves - Gas Service

<i>Device ID #</i>	008323	<i>Device Name</i>	Valves - Gas Service
<i>Rated Heat Input</i>		<i>Physical Size</i>	851.00 Component Leakpath
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Gas Plant 10		
<i>Device Description</i>	851 clps		
	Included in ATC 12913: NRU Main Skid: 43 clps NRU Sales Compressor: 11 clps NRU Field Fuel Compressor: 11 clps		

4.2 Connections - Gas Service

<i>Device ID #</i>	008327	<i>Device Name</i>	Connections - Gas Service
<i>Rated Heat Input</i>		<i>Physical Size</i>	6414.00 Component Leakpath
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Gas Plant 10		
<i>Device Description</i>	6,414 clps		
	Included in ATC 12913: Main NRU Skid: 114 clps NRU Sales Compressor: 89 clps NRU Field Fuel Compressor: 89 clps		

Equipment List for Part 70 Minor Modification 12913 / Permit to Operate 12913

4.3 Compressor Seals (to atm) - Gas Service

<i>Device ID #</i>	008329	<i>Device Name</i>	Compressor Seals (to atm) - Gas Service
<i>Rated Heat Input</i>		<i>Physical Size</i>	6.00 Component Leakpath
<i>Manufacturer Model</i>		<i>Operator ID Serial Number</i>	
<i>Location Note</i>	Gas Plant 10		
<i>Device Description</i>	6 clps		
	Included in ATC 12913: Main NRU Skid: 1 clps NRU Sales Compressor: 2 clps NRU Field Fuel Compressor: 2 clps		

4.4 Relief Valves (to atm) - Gas Service

<i>Device ID #</i>	008332	<i>Device Name</i>	Relief Valves (to atm) - Gas Service
<i>Rated Heat Input</i>		<i>Physical Size</i>	27.00 Component Leakpath
<i>Manufacturer Model</i>		<i>Operator ID Serial Number</i>	
<i>Location Note</i>	Gas Plant 10		
<i>Device Description</i>	27 clps		
	Included in ATC 12913: Main NRU Skid: 12 clps NRU Sales Compressor: 3 clps NRU Field Fuel Compressor: 3 clps		

E DE-PERMITTED EQUIPMENT

1 Gas ReInjection Compressor

<i>Device ID #</i>	112683	<i>Device Name</i>	Gas ReInjection Compressor
<i>Rated Heat Input</i>		<i>Physical Size</i>	100.00 Horsepower (Electric Motor)
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Depermitted</i>		<i>Facility Transfer</i>	
<i>Device</i>	Used to reinject nitrogen-rich gas into the producing formation.		
<i>Description</i>	DePermitted from ATC 12913 because it was not necessary to the process and installation never occurred.		



**PERMIT EVALUATION FOR
PART 70 MINOR MODIFICATION 12913 / PERMIT TO OPERATE 12913**

1.0 BACKGROUND

- 1.1 General: The application for Permit to Operate 12913 was received on July 19, 2010. The application is to operate equipment that removes nitrogen from produced natural gas. An SCDP inspection was conducted on April 28, 2010 and no violations were documented.
- 1.2 Permit History: Two permits have been issued for Gas Plant 10 since the most recent permit reevaluation in June 2008:

PERMIT	FINAL ISSUED	PERMIT DESCRIPTION
PTO 12599	03/08/2010	Replace the 3 hp vapor recovery compressor with a 10 hp compressor. Serves the amine reboiler and the glycol reboiler.
ATC 12913	07/06/2009	Nitrogen removal unit used to bring the nitrogen content of the sales gas to 3% or less.

1.3 Compliance History:

VIOLATION TYPE	NUMBER	ISSUE DATE	DESCRIPTION OF VIOLATION
NOV	9744	12/21/2010	Exceeded the number of allowable major gas leaks from valve components and other components (two counts).

2.0 ENGINEERING ANALYSIS

- 2.1 Equipment/Processes: Produced gas from the South Cuyama Unit is metered prior to being processed through one of four skid mounted gas adsorption towers. Each tower contains four beds of catalyst that are used to lower the nitrogen content of the produced gas to the gas purchaser's standards. Three gas streams exit the adsorbers: 1) A fuel gas stream is removed from the adsorber with a vacuum compressor, piped through a 3,000 gallon surge tank, and then compressed and used as fuel at the E&B South Cuyama stationary source. 2) A sales gas stream with a nitrogen content of 3% exits the adsorption towers and goes directly to a sales gas compressor and sent to the sales pipeline. 3) A recycle stream passes through a 3,000 gallon recycle tank prior to being sent by the recycle blower to the Gas Plant 10 inlet. Nitrogen from the system goes to a waste gas compressor and is reinjected into producing formation. The only emissions are associated with fugitive components.

PERMIT EVALUATION FOR
PART 70 MINOR MODIFICATION 12913 / PERMIT TO OPERATE 12913

Page 2 of 4

- 2.2 Emission Controls: A fugitive hydrocarbon inspection and maintenance program is used to comply with District Rule 331. An 80-percent reduction is applied to emissions from valves, fittings, connections and other components associated with this project.
- 2.3 Emission Factors: The only emissions from this project are fugitive hydrocarbons. The emission factors and the emission calculations are included in Attachment "A".
- 2.4 Reasonable Worst Case Emission Scenario: Operation of the permitted equipment at full permitted capacity, 24 hours/day, 365 days per year comprises the reasonable worst case-operating scenario for this permit.
- 2.5 Emission Calculations: Detailed emission calculation spreadsheets may be found in Emission Calculations Attachment. These emissions define the Potential to Emit for the permitted equipment.
- 2.6 Special Calculations: There are no special calculations.
- 2.7 BACT Analyses: Best Available Control Technology was not required for this project.
- 2.8 Enforceable Operational Limits: The permit has enforceable operating conditions that ensure the equipment is operated properly.
- 2.9 Monitoring Requirements: Monitoring of the equipment's operational limits are required to ensure that these are enforceable. This permit requires monitoring the parameters required by District Rule 331.G.
- 2.10 Recordkeeping and Reporting Requirements: The permit requires that the data which is monitored be recorded and reported to the District.

3.0 REEVALUATION REVIEW (not applicable)

4.0 REGULATORY REVIEW

- 4.1 Partial List of Applicable Rules: This project is anticipated to operate in compliance with the following rules:

- Rule 101. Compliance of Existing Facilities
- Rule 201. Permits Required
- Rule 202. Exemptions to Rule 201
- Rule 205. Standards for Granting Permits
- Rule 303. Nuisance
- Rule 331. Fugitive Emissions Inspection and Maintenance
- Rule 505. Breakdown Procedures
- Rule 801. New Source Review
- Rule 802. Nonattainment Review
- Rule 803. Prevention of Significant Deterioration

PERMIT EVALUATION FOR
PART 70 MINOR MODIFICATION 12913 / PERMIT TO OPERATE 12913

Page 3 of 4

4.2 Rules Requiring Review: None

4.3 NEI Calculations: The net emission increase calculation is used to determine whether certain requirements must be applied to a project (e.g., offsets, AQIA, PSD BACT). The emissions included in this permit contribute to the NEI for this facility and are detailed in the attached tables.

5.0 AQIA

The project is not subject to the Air Quality Impact Analysis requirements of Regulation VIII.

6.0 OFFSETS/ERCs

6.1 Offsets: The emission offset thresholds of Regulation VIII are not exceeded.

6.2 ERCs: This source does not generate emission reduction credits.

7.0 AIR TOXICS

An air toxics health risk assessment was not performed for this permitting action.

8.0 CEQA / LEAD AGENCY

The Santa Barbara County Planning and Development Department (P&D) is the Lead Agency for this project. On November 12, 2008, P&D issued Land Use Permit 08LUP-00000-00521 for the nitrogen removal project. Because P&D does not address air quality in their approval of such projects, the District is the Responsible Agency under CEQA for air quality. Appendix A. of the District CEQA Guidelines specifically exempts fugitive hydrocarbon emitting components where the total number of component leak-paths being added is less than 1,500 and meet or exceed the requirements of District Rule 331. The project has no potential for causing a significant adverse environmental impact. No further action is necessary.

9.0 SCHOOL NOTIFICATION

A school notice pursuant to the requirements of H&SC §42301.6 was not required.

10.0 PUBLIC and AGENCY NOTIFICATION PROCESS/COMMENTS ON DRAFT PERMIT

This project was not subject to public notice. The draft permit was sent to the permittee on January 27, 2011. The permittee responded February 18, 2011 and requested the Gas Reinjection Compressor be removed from the permit and the Fuel Compressor be changed from 40 Hp to 100 Hp in accordance to what was installed. The District response was to depermit the Gas Reinjection Compressor because it was not installed within the process and to change the Fuel Compressor from 40 Hp to 100 Hp.

11.0 FEE DETERMINATION

Fees for the District's work effects are assessed on a fee basis. The Project Code is 300500 (*Oil and Gas Plant*). See the *Fee Statement* Attachment for the fee calculations.

12.0 RECOMMENDATION

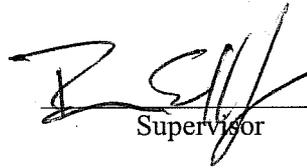
It is recommended that this permit be granted with the conditions as specified in the permit.

PERMIT EVALUATION FOR
PART 70 MINOR MODIFICATION 12913 / PERMIT TO OPERATE 12913

Page 4 of 4

Stefanie Boehme
AQ Engineer

01/26/2011
Date


Supervisor

5/2/11
Date

13.0 ATTACHMENT

- Emission Calculations
- Figures & Tables
- Fee Statement

Attachment "A"
Emission Calculations

FUGITIVE ROC EMISSIONS CALCULATION

ADMINISTRATIVE INFORMATION	
Attachment: 1	
Company: E&B	
Facility: Gas Plant 10 Nitrogen Unit	
Processed by: PES	
Date: 06/23/09	
Path & File Name:	

Facility Type: (Choose one)	Production Field	ROC ⁽²⁾ Emission Factor (lbs/day-clip)	ROC/THC Ratio	Uncontrolled ROC Emission (lbs/day)	ROC Control Eff	Controlled ROC Emission (lbs/hr)	Controlled ROC Emission (lbs/day)	Controlled ROC Emission (Tons/Qttr)	Controlled ROC Emission (Tons/year)
Component	Count ⁽¹⁾								
Gas Condensate Service									
Valves - Acc/Inacc	65	1.058	0.38	26.13	0.80	0.22	5.23	0.24	0.95
Valves - Bellows		1.058	0.38	0.00	1.00	0.00	0.00	0.00	0.00
Valves - Unsafe		1.058	0.38	0.00	0.00	0.00	0.00	0.00	0.00
Valves - Low Emitting		1.058	0.38	0.00	0.00	0.00	0.00	0.00	0.00
Valves - E-500		1.058	0.38	0.00	0.85	0.00	0.00	0.00	0.00
Valves - E-100		1.058	0.38	0.00	0.90	0.00	0.00	0.00	0.00
Flanges - Acc/Inacc	292	0.058	0.43	7.28	0.80	0.05	1.46	0.07	0.27
Flanges - Unsafe		0.058	0.43	0.00	0.00	0.00	0.00	0.00	0.00
Flanges - E-500		0.058	0.43	0.00	0.85	0.00	0.00	0.00	0.00
Flanges - E-100		0.058	0.43	0.00	0.90	0.00	0.00	0.00	0.00
Compressor Seals - To Atm	5	10.794	0.20	10.79	0.80	0.09	2.16	0.10	0.39
Compressor Seals - To VRS		10.794	0.20	0.00	1.00	0.00	0.00	0.00	0.00
Compressor Seals - E-500		10.794	0.20	0.00	0.85	0.00	0.00	0.00	0.00
Compressor seals - E-100		10.794	0.20	0.00	0.90	0.00	0.00	0.00	0.00
PSV - To Atm	18	9.947	0.07	12.53	0.80	0.10	2.51	0.11	0.46
PSV - To VRS		9.947	0.07	0.00	1.00	0.00	0.00	0.00	0.00
PSV - E-500		9.947	0.07	0.00	0.85	0.00	0.00	0.00	0.00
PSV - E-100		9.947	0.07	0.00	0.90	0.00	0.00	0.00	0.00
Pump Seals		3.300	0.79	0.00	0.80	0.00	0.00	0.00	0.00
Pump Seals - E-500		3.300	0.79	0.00	0.85	0.00	0.00	0.00	0.00
Pump Seals - E-100		3.300	0.79	0.00	0.90	0.00	0.00	0.00	0.00
Sub Total	360			56.74		0.47	11.35	0.52	2.07

Attachment "B"
Figures & Tables

Stationary Source Net Emissions Increase
E&B Couth Cuyama
PTO 12913

I. This Projects "I" NEI-90

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
ATC 12913		0.00	0.00	11.35	2.07	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Totals		0.00	0.00	11.35	2.07	0.00							

II. This Source's "P1s"

Enter all facility "P1" NEI-90s below:

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
PTO 7250 - R7	6/2/2008	0.00	0.00	21.46	3.82	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PTO 8010 - R6	6/2/2008	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PTO 9136 - R5	6/2/2008	1.53	0.28	17.80	3.25	1.29	0.23	0.21	0.04	0.12	0.02	0.12	0.02
ATC 12599	9/25/2008	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ATC 12925	3/1/2009	0.00	0.00	2.14	0.39	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ATC 12883 - 01		0.00	0.00	9.59	1.75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Totals		1.53	0.28	50.99	9.21	1.29	0.23	0.21	0.04	0.12	0.02	0.12	0.02

Notes: (1) Facility NEI from IDS.

III. This Source's "P2" NEI-90 Decreases

Enter all facility "P2" NEI-90s below:

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
ATC 12883 - 01		0.00	0.00	11.69	2.51	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Totals		0.00	0.00	11.69	2.51	0.00							

Notes: (1) Facility NEI from IDS.

IV. This Source's Pre-90 "D" Decreases

Enter all facility "D" decreases below:

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr										
Totals		0.00											

Notes: (1) Facility "D" from IDS.

V. Calculated This Source's NEI-90

Table below summarizes facility NEI-90 as equal to: I+ (P1-P2) -D

Term	NOx		ROC		CO		SOx		PM		PM10	
	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
Project "I"	0.00	0.00	11.35	2.07	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
P1	1.53	0.28	50.99	9.21	1.29	0.23	0.21	0.04	0.12	0.02	0.12	0.02
P2	0.00	0.00	11.69	2.51	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
D	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FNEI-90	1.53	0.28	50.65	8.77	1.29	0.23	0.21	0.04	0.12	0.02	0.12	0.02

Notes: (1) Resultant FNEI-90 from above Section I thru IV data.
(2) Totals only apply to permits for this facility ID. Totals may not appear correct due to rounding.
(3) Because of rounding, values in this table shown as 0.00 are less than 0.005, but greater than zero.

Attachment "C"
Fee Statement

FEE STATEMENT

PTO No. 12913

FID: 03202 Gas Plant 10 / SSID: 01073



Santa Barbara County
Air Pollution Control District

Device Fee

Device No.	Device Name	Fee Schedule	Qty of Fee Units	Fee per Unit	Fee Units	Max or Min. Fee Apply?	Number of Same Devices	Pro Rate Factor	Device Fee	Penalty Fee?	Fee Credit	Total Fee per Device
112423	Gas Processing Unit	A1.a	1.000	58.66	Per equipment	No	1	1.000	58.66	0.00	0.00	58.66
112425	Fuel Compressor	A2	100.000	30.41	Per total rated hp	No	1	1.000	3,041.00	0.00	0.00	3,041.00
112427	Vacuum Compressor	A2	100.000	30.41	Per total rated hp	No	1	1.000	3,041.00	0.00	0.00	3,041.00
112428	Sales Compressor	A2	100.000	30.41	Per total rated hp	No	1	1.000	3,041.00	0.00	0.00	3,041.00
112429	Recycle Blower	A2	7.500	30.41	Per total rated hp	No	1	1.000	228.08	0.00	0.00	228.08
112424	Recycle Tank	A6	1.000	3.36	Per 1000 gallons	Min	1	1.000	58.28	0.00	0.00	58.28
112426	Fuel Surge Tank	A6	3.000	3.36	Per 1000 gallons	Min	1	1.000	58.28	0.00	0.00	58.28
112430	Rep Tank 1	A6	1.000	3.36	Per 1000 gallons	Min	1	1.000	58.28	0.00	0.00	58.28
112431	Rep Tank 2	A6	1.000	3.36	Per 1000 gallons	Min	1	1.000	58.28	0.00	0.00	58.28
112432	Equalization Tank 1	A6	1.000	3.36	Per 1000 gallons	Min	1	1.000	58.28	0.00	0.00	58.28
112433	Equalization Tank 2	A6	1.000	3.36	Per 1000 gallons	Min	1	1.000	58.28	0.00	0.00	58.28
112434	Purge Tank	A6	1.000	3.36	Per 1000 gallons	Min	1	1.000	58.28	0.00	0.00	58.28
Device Fee Sub-Totals =									\$9,817.70	\$0.00	\$0.00	\$9,817.70
Device Fee Total =									\$9,817.70	\$0.00	\$0.00	\$9,817.70

Permit Fee

Fee Based on Devices

9,817.70

Fee Statement Grand Total = \$9,817

Notes:

- (1) Fee Schedule Items are listed in APCD Rule 210, Fee Schedule "A".
- (2) The term "Units" refers to the unit of measure defined in the Fee Schedule.

