



APR 30 2012

Carlton Jordan  
Shell Pipeline Company LP  
20945 S Wilmington Ave  
Carson, CA 90810-1039

**Re: Notice of Minor Title V Permit Modification  
District Facility # C-1234  
Project # C-1120406**

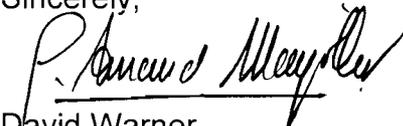
Dear Mr. Jordan:

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 #C-1234-3-5 into the Title V operating permit. The facility is proposing to modify the dormant 37.5 MMBtu/hr natural-gas/fuel oil-fired heater by removing the dormant status and crude oil firing option. The existing 37.5 MMBtu/hr burner will be replaced with a 30 MMBtu/hr ultra-low NOX burner with FGR to meet the 7 ppmvd @ 3% O<sub>2</sub> (equivalent to 0.008 lb/MMBtu) NOX emission requirements of District Rule 4320.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct #C-1234-3-5, 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. Jim Swaney at (559) 230-5900.

Sincerely,



*for*  
David Warner  
Director of Permit Services

Enclosures

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

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

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

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



APR 30 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 # C-1234**  
**Project # C-1120406**

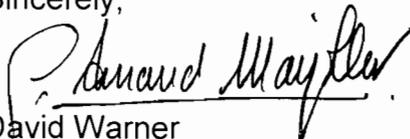
Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Shell Pipeline Company LP is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct #C-1234-3-5 into the Title V operating permit. The facility is proposing to modify the dormant 37.5 MMBtu/hr natural-gas/fuel oil-fired heater by removing the dormant status and crude oil firing option. The existing 37.5 MMBtu/hr burner will be replaced with a 30 MMBtu/hr ultra-low NOX burner with FGR to meet the 7 ppmvd @ 3% O2 (equivalent to 0.008 lb/MMBtu) NOX emission requirements of District Rule 4320.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct #C-1234-3-5, 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. Jim Swaney at (559) 230-5900.

Sincerely,

*for*   
David Warner  
Director of Permit Services

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# TITLE V APPLICATION REVIEW

Minor Modification  
Project #: C-1120406

Engineer: Juscelino Siongco  
Date: March 14, 2012

Facility Number: C-1234  
Facility Name: Shell Pipeline Company LP  
Mailing Address: 20945 S Wilmington Ave  
Carson, CA 90810-1039

Contact Name: Carlton Jordan  
Phone: (310) 816-2060

Responsible Official: Michael Bringham  
Title: Operations Manager

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## I. PROPOSAL

Shell Pipeline Company LP is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct (ATC) #C-1234-3-5 into the Title V operating permit. The facility is replacing the existing North American Model 513HCRG burner with a North American Model 4211-38LE ultra low NO<sub>x</sub> burner and FGR and remove the option to fire crude oil.

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.

## II. FACILITY LOCATION

Coalinga Pump Station, 37509 Oil City Rd, Coalinga, CA 93210

## III. EQUIPMENT DESCRIPTION

C-1234-3-6: 30.0 MMBTU/HR NATIONAL OIL HEATER #3 WITH NORTH AMERICAN MODEL 4211-38 LE ULTRA LOW NOX BURNER AND FGR

#### 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 June 21, 2001)

#### VI. DESCRIPTION OF PROPOSED MODIFICATIONS

Shell Pipeline Company is proposing to modify the dormant 37.5 MMBtu/hr natural-gas/fuel oil-fired heater by removing the dormant status and crude oil firing option. The existing 37.5 MMBtu/hr burner will be replaced with a 30 MMBtu/hr ultra-low NO<sub>x</sub> burner with FGR to meet the 7 ppmvd @ 3% O<sub>2</sub> (equivalent to 0.008 lb/MMBtu) NO<sub>x</sub> emission requirements of District Rule 4320.

##### S-1234-3-6:

Permit conditions 1, 2, and 3 on the current Permit to Operate were dormant conditions that were no longer needed since the heater was placed in operational status.

Permit condition 4 on the current Permit to Operate was included as condition 1 on the proposed permit.

Permit conditions 5, 6, and 7 on the current Permit to Operate were fuel oil firing requirements that were removed since the unit is not allowed to fire on fuel oil.

Permit condition 8 on the current Permit to Operate that limits natural gas consumption was removed since the unit operates full-time.

Permit condition 9 on the current Permit to Operate was included as condition 3 on the proposed permit.

Permit conditions 10, 11, and 12 on the current Permit to Operate had been included as conditions 20, 21, and 22 on the proposed permit. References to fuel oil firing were removed since the unit fires exclusively on PUC-regulated natural gas.

Permit condition 13 on the current Permit to Operate was not included in the proposed permit since this requirement was for firing on natural gas other than PUC-regulated natural gas.

Permit condition 14 on the current Permit to Operate was not included in the proposed permit since the fuel limit restrictions had been removed.

Permit conditions 15 through 21 on the current Permit to Operate were not included in the proposed permit since these were requirements for firing on non-certified fuels.

Permit condition 22 on the current Permit to Operate was included as condition 23 on the proposed permit.

## 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 No. C-1234-3-6
- B. Authorities to Construct No. C-1234-3-5
- C. Emissions Increases
- D. Application
- E. Previous Title V Operating Permit No. C-1234-3-4

# ATTACHMENT A

Proposed Modified Title V Operating Permit No.  
(C-1234-3-6)

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1234-3-6

EXPIRATION DATE: 04/30/2016

**EQUIPMENT DESCRIPTION:**

30.0 MMBTU/HR NATIONAL OIL HEATER #3 WITH NORTH AMERICAN MODEL 4211-38 LE ULTRA-LOW NOX BURNER AND FGR

## PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. The unit shall only be fired on PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Emissions from this unit shall not exceed any of the following limits: 7 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.008 lb-NO<sub>x</sub>/MMBtu, 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, 50 ppmvd CO @ 3% O<sub>2</sub> or 0.0370 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
6. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required during the shakedown period allowed by this permit. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
7. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

8. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
9. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
10. 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, 4306 and 4320] Federally Enforceable Through Title V Permit
11. Source testing to measure NO<sub>x</sub> and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
12. Source testing to measure NO<sub>x</sub> and CO emissions from this unit shall be conducted within 90 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
13. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
14. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
15. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
16. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
18. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. 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
20. Nitrogen Oxide (NO<sub>x</sub>) emissions shall not exceed 140 lb/hr, calculated as NO<sub>2</sub>. [District Rules 4301, 5.2.2, 5.3, and 5.5] Federally Enforceable Through Title V Permit
21. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO<sub>2</sub>. [District Rules 4301, 5.2.1] Federally Enforceable Through Title V Permit
22. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [District Rule 4801 and Fresno County Rule 406] 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.

23. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4306, and 4320] Federally Enforceable Through Title V Permit

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

DRAFT

# ATTACHMENT B

Authorities to Construct No.  
(C-1234-3-5)



## AUTHORITY TO CONSTRUCT

PERMIT NO: C-1234-3-5

ISSUANCE DATE: 04/02/2009

**LEGAL OWNER OR OPERATOR:** SHELL PIPELINE COMPANY LP  
**MAILING ADDRESS:** 20945 S WILMINGTON AVE  
CARSON, CA 90810-1039

**LOCATION:** COALINGA PUMP STATION  
37509 OIL CITY RD  
COALINGA, CA 93210

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF DORMANT 37.5 MMBTU/HR NATIONAL OIL HEATER #3 WITH NORTH AMERICAN MODEL 513HCRG BURNER; REMOVE DORMANT STATUS, RETROFIT THE HEATER BY REPLACING 37.5 MMBTU/HR BURNER WITH 30.0 MMBTU/HR NORTH AMERICAN (OR DISTRICT APPROVED EQUIVALENT) MODEL 4211-38 LE (OR DISTRICT APPROVED EQUIVALENT) ULTRA LOW NOX BURNER AND FGR; AND ALSO REMOVE CRUDE OIL FIRING OPTION (REVISED 6/21/10 TO ALLOW FOR A 90 DAY SHAKEDOWN PERIOD- RWK)

### CONDITIONS

1. Prior to operating with the modifications authorized by this Authority to Construct permit, the facility shall submit an application to the District for a modification to the Title V permit, in accordance with District Rule 2520, Section 11.4.2. [District Rule 2520] Federally Enforceable Through Title V Permit
2. After completion of the shakedown period allowed by this permit, Permits to Operate C-1234-8-8 and C-1234-9-7 shall be surrendered to the District and the associated equipment shall be removed or rendered inoperable. [District Rule 2201] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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

*Richard W. Karnas*

DAVID WARNER, Director of Permit Services

C-1234-3-5 : Jun 21 2010 10:53AM - KARRSR : Joint Inspection NOT Required

6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
7. Permittee shall obtain APCO approval for the use of any equivalent low-NOx burner not specifically approved by this ATC document prior to installation. Approval of any equivalent low-NOx burner shall be made by the APCO's determination that the submitted design and performance data for alternate burner are equivalent to an approved burner. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Permittee's request for approval of an equivalent low-NOx burner shall include at minimum the following information: burner manufacturer and model number, maximum heat input rating, manufacturer's performance and design specifications, manufacturer's burner drawings, and description of low-NOx operation. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Permittee's request for approval of an equivalent low-NOx burner shall be submitted to the District at least 60 days prior to the planned installation date. The permittee shall also notify the District at least 30 days prior to the actual installation of the District approved equivalent low-NOx burner. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The unit shall only be fired on PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Except during the shakedown period allowed by this permit, emissions from this unit shall not exceed any of the following limits: 7 ppmvd NOx @ 3% O2 or 0.008 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 50 ppmvd CO @ 3% O2 or 0.0370 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
12. The shakedown period shall not exceed 90 calendar days from the initial start-up of this unit after the implementation of the modifications authorized by this permit. Existing Solar Centaur gas turbine engines, units S-1234-8 and '9, are authorized to remain in operation during the shakedown period. The permittee shall maintain a record of the date of initial operation of this unit and of the final shutdown of units S-1234-8 and '9. These records shall be made readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The permittee shall monitor and record the stack concentration of NOx, 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 during the shakedown period allowed by this permit. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
14. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
15. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

16. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
17. 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, 4306 and 4320] Federally Enforceable Through Title V Permit
18. Source testing to measure NO<sub>x</sub> and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
19. Source testing to measure NO<sub>x</sub> and CO emissions from this unit shall be conducted within 90 days of initial start-up. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
20. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
21. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
22. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
23. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
24. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
25. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
26. 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
27. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4306 and 4320] Federally Enforceable Through Title V Permit

# ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
C-1234-3-6	0	0	0	0	0
TOTAL	0	0	0	0	0

# ATTACHMENT D

Application

# San Joaquin Valley Air Pollution Control District

www.valleyair.org

**RECEIVED**

FEB 23 2012

Permits Srvc  
SJVAPCD

## Permit Application For:

ADMINISTRATIVE AMENDMENT     MINOR MODIFICATION     SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <p style="text-align: center;">Shell Pipeline Company LP</p>	
2. MAILING ADDRESS:  STREET/P.O. BOX: <u>20945 S. Wilmington Ave.</u>  CITY: <u>Carson</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>90810-1039</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:  STREET: <u>37509 Oil City Road</u> CITY: <u>Coalinga</u>  <u>      </u> ¼ SECTION <u>17</u> TOWNSHIP <u>20S</u> RANGE <u>15E</u>	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: <p style="text-align: center;">Pipeline Pump Station</p>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) <p style="text-align: center;">C-1234-3-5 30.0 MMBTU/HR NATIONAL OIL HEATER #3 WITH NORTH AMERICAN MODEL 4211-38 LE BURNER AND FGR</p>	
6. TYPE OR PRINT NAME OF APPLICANT:  Carlton Jordan	TITLE OF APPLICANT:  Staff Engineer
7. SIGNATURE OF APPLICANT:  <i>Carlton Jordan</i>	DATE: <u>2/6/12</u>  PHONE: 310-816-2060 FAX: 713-423-0450 EMAIL: carlton.r.jordan@shell.com

For APCD **RECEIVED**

DATE STAMP <p style="text-align: center;"><b>FEB 28 2012</b></p> <p style="text-align: center;">FINANCE SJVUAPCD</p>	FILING FEE RECEIVED: <u>\$ 17.00</u> CHECK#: <u>500008061</u>  DATE PAID: <u>2/22/12 A.L.</u>  PROJECT NO: <u>C-1120406</u> FACILITY ID: <u>C-1234</u>
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RECEIVED

FEB 23 2012

Permits Srvc  
SJVAPCD

San Joaquin Valley  
Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION
- MINOR PERMIT MODIFICATION
- ADMINISTRATIVE AMENDMENT

COMPANY NAME: <b>Shell Pipeline Company LP</b>	FACILITY ID: C-1234
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:	
3. Agent to the Owner:	

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

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment 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:

Michael W. Bringham  
Signature of Responsible Official

2/14/12  
Date

Michael W. Bringham  
Name of Responsible Official (please print)

Operations Manager  
Title of Responsible Official (please print)

Note: To incorporate C-1234-3-5 into Title V permit

Mailing Address: Central Regional Office \* 1990 E. Gettysburg Avenue \* Fresno, California 93726-0244 \* (559) 230-5900 \* FAX (559) 230-6061

TVFORM-009  
Rev: July 2005

# ATTACHMENT E

Previous Title V Operating Permit No.  
(C-1234-3-4)

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-1234-3-4

**EXPIRATION DATE:** 04/30/2016

**EQUIPMENT DESCRIPTION:**

DORMANT 37.5 MMBTU/HR NATIONAL OIL HEATER #3 WITH NORTH AMERICAN MODEL 513HCRG BURNER

## PERMIT UNIT REQUIREMENTS

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1. No modification to this unit shall be performed without an Authority to Construct for such modification(s). [District Rule 2010] Federally Enforceable Through Title V Permit
2. The fuel supply line shall be physically disconnected from this unit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
3. This equipment shall not be operated for any reason until an Authority to Construct (ATC) permit is issued approving all necessary modifications required to comply with the applicable requirements of District Rule 4305, District Rule 4306, District Rule 4320, and all other applicable District regulations. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Use of oil fired heaters permitted under C-1234-2 and C-1234-3 shall be limited to 30 days/year for maintenance of turbines permitted under C-1234-8 and C-1234-9. [District NSR Rule and District Rule 4305, 5.2] Federally Enforceable Through Title V Permit
6. Crude oil consumption shall not exceed 170 gal/hour. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The sulfur content of the crude oil shall not exceed 1.1% by weight. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Natural gas consumption shall not exceed 37,500 scf/hour. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO<sub>2</sub>, nor 10 lb/hr. [District Rule 4201 and District Rule 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
10. Nitrogen Oxide (NO<sub>x</sub>) emissions shall not exceed 140 lb/hr, calculated as NO<sub>2</sub>. For residual and crude oil fired units, NO<sub>x</sub> emissions may be calculated using supplier certification of the nitrogen content and heating value, or using reference materials approved by the District. Hourly emissions shall be calculated using the heating value, maximum rated unit capacity, and the following formula:  $\text{lb NO}_2/1000 \text{ gal} = 20.54 + 104.39 (N)$ , where N is the weight % nitrogen in the fuel. [District Rules 2520, 9.3.2 and 4301, 5.2.2, 5.3, and 5.5] Federally Enforceable Through Title V Permit
11. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO<sub>2</sub>. If this unit is not fired on PUC or FERC regulated natural gas, then the hourly emissions shall be determined by calculating the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit. [District Rules 2520, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: SHELL PIPELINE COMPANY LP

Location: COALINGA PUMP STATION, 37509 OIL CITY RD, COALINGA, CA 93210

C-1234-3-4 : Mar 14 2012 7:56AM - SIONGCCJ

12. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [District Rule 4801 and Fresno County Rule 406] Federally Enforceable Through Title V Permit
13. If the unit is fired on natural gas, then the natural gas sulfur content shall be less than or equal to 3.3% by weight. [District Rule 4801 and Fresno County Rule 406] Federally Enforceable Through Title V Permit
14. The permittee shall monitor and record the monthly and cumulative annual fuel heat input of the unit in Btus. [District Rule 4305, 6.1.3] Federally Enforceable Through Title V Permit
15. The higher heating value (hhv) for each fuel shall be certified by a third party fuel supplier or determined by ASTM D 240 or D 2382 for liquid hydrocarbon fuels; or ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 4305, 6.2.1] Federally Enforceable Through Title V Permit
16. If the unit is not fired on a PUC-regulated natural gas or fuel certified by a third party fuel supplier, then the sulfur content and higher heating value (hhv) of each fuel source shall be tested weekly except that 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 quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rules 2520, 9.3.2 and Rule 4801; Fresno County Rule 407] Federally Enforceable Through Title V Permit
17. If the unit is fired on noncertified gaseous fuel, then the sulfur content of gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3246, D 4084, or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
18. The sulfur content of the liquid fuel being fired in the unit shall be determined using ASTM D 2880. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
19. If the unit is not fired on PUC-regulated natural gas, the permittee shall maintain records of fuel sulfur content. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
20. Copies of all fuel invoices, gas purchase contracts, natural gas bills, supplier certifications, and test results to determine compliance with the conditions of this permit 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
21. While firing on crude oil, the permittee shall inspect the heater exhaust stack weekly for excessive visible emissions. The inspection shall include verifying the equipment is performing normal, design functions, and is being operated according to standard procedures and per the manufacturer's recommendations. If the equipment is not performing according to design and procedures or if excessive visible emissions are observed from the exhaust stack, the permittee shall take corrective action within 24 hours. If excessive visible emission cannot be corrected within 24 hours, EPA Method 9, except for data reduction (Section 2.5), shall be conducted to determine compliance with the 20% facility-wide opacity limit. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
22. All records of required monitoring data and support information shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rules 2520, 9.4.2 and 4305, 6.1] Federally Enforceable Through Title V Permit

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