San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

NOV 13 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-311
Project # C-1112109

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Chevron U.S.A., Inc. is proposing a Title V minor permit modification to incorporate the recently issued C-311-20-16, '-21-7, '-25-6, '-28-16, '-30-16, '-36-17, '-37-21, '-38-21, '-39-19, '-40-18, '-41-15, '-76-15, and '-84-16 into the Title V operating permit. These modifications limit fuel sulfur and exhaust sulfur content for Rule 4320 compliance.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued C-311-20-16, '-21-7, '-25-6, '-28-16, '-30-16, '-36-17, '-37-21, '-38-21, '-39-19, '-40-18, '-41-15, '-76-15, and '-84-16, 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

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
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San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

NOV 13 2012

Lance Erickson
Chevron U.S.A., Inc.
P.O. Box 1392
Bakersfield, CA 93302

Re: Notice of Minor Title V Permit Modification
District Facility # C-311
Project # C-1112109

Dear Mr. Erickson:

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 C-311-20-16, '-21-7, '-25-6, '-28-16, '-30-16, '-36-17, '-37-21, '-38-21, '-39-19, '-40-18, '-41-15, '-76-15, and '-84-16 into the Title V operating permit. These modifications limit fuel sulfur and exhaust sulfur content for Rule 4320 compliance.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued C-311-20-16, '-21-7, '-25-6, '-28-16, '-30-16, '-36-17, '-37-21, '-38-21, '-39-19, '-40-18, '-41-15, '-76-15, and '-84-16, 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,

David Warner
Director of Permit Services

Enclosures

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TITLE V APPLICATION REVIEW

Minor Modification
Project #: C-1112109

Engineer: Kris Rickards
Date: November 6, 2012

Reviewed by AP SWR AQE

NOV 0 8 2012

Facility Number: C-311
Facility Name: Chevron U.S.A., Inc.
Mailing Address: P.O. Box 1392
Bakersfield, CA 93302

Contact Name: Lance Erickson
Phone: 661-654-7145

Responsible Official: Jason Donchin
Title: SJVBU HES Manager

I. PROPOSAL

Chevron U.S.A., Inc. is proposing a Title V minor permit modification to incorporate the recently issued C-311-20-16, '-21-7, '-25-6, '-28-16, '-30-16, '-36-17, '-37-21, '-38-21, '-39-19, '-40-18, '-41-15, '-76-15, and '-84-16 into the Title V operating permit. These modifications limit fuel sulfur content for Rule 4320 compliance.

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

These units are located at the Coalinga Oilfield within CUSA's Fresno Heavy Oil Stationary Source; Township 20S, Range 14E.

III. EQUIPMENT DESCRIPTION

C-311-20-20: 58.5 MMBTU/HR NATURAL GAS-FIRED STRUTHERS THERMOFLOOD SG 13-04 STEAM GENERATOR WITH A NORTH AMERICAN GLE LOW-NOX BURNER WITH OXYGEN CONTROLLER

C-311-21-11: 58.5 MBTU/HR SG 13-5 STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE LOW-NOX BURNER

C-311-25-10: 58.5 MMBTU/HR SG 13-9 STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE LOW-NOX BURNER AND FLUE GAS RECIRCULATION SYSTEM

C-311-28-20: 58.5 MMBTU/HR STRUTHERS THERMOFLOOD STEAM GENERATOR #13-12, MODEL OH-50-ND-16XAM, EQUIPPED WITH A NORTH AMERICAN GLE BURNER, FLUE GAS RECIRCULATION (FGR), AND AN OXYGEN CONTROLLER

C-311-30-19: 62.5 MMBTU/HR STRUTHERS THERMOFLOOD STEAM GENERATOR #13-14, MODEL OH-50-ND-16XAM, NATURAL GAS FIRED, WITH A NORTH AMERICAN GLE BURNER, AN OXYGEN CONTROLLER, AND A FLUE GAS RECIRCULATION (FGR) SYSTEM

C-311-36-21: 58.5 MMBTU/HR SG 25-15 NATURAL/LPG/TANK VAPOR RECOVERY/CASING GAS-FIRED STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN MODEL GLE BURNER AND FLUE GAS RECIRCULATION (FGR) SYSTEM, SERVED BY THE 25D NEPTUNE AIRPOL CAUSTIC SCRUBBER, ALSO SERVING STEAM GENERATORS LISTED ON PERMITS C-311-37, '-38, '-39, '-40, AND '-41, WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS

C-311-37-26: 62.5 MMBTU/HR SG 25-16 NATURAL/LPG/TANK VAPOR RECOVERY/CASING GAS-FIRED STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN MODEL GLE BURNER AND FLUE GAS RECIRCULATION (FGR) SYSTEM, SERVED BY THE 25D NEPTUNE AIRPOL CAUSTIC SCRUBBER, LISTED ON PERMIT C-311-36, WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS

C-311-38-25: 58.5 MMBTU/HR SG 25-17 NATURAL/LPG/TANK VAPOR RECOVERY/CASING GAS-FIRED STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE BURNER AND FLUE GAS RECIRCULATION (FGR) SYSTEM, SERVED BY THE 25D NEPTUNE AIRPOL CAUSTIC SCRUBBER, LISTED ON PERMIT C-311-36, WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS

C-311-39-19: 58.5 MMBTU/HR SG 25-18 NATURAL/LPG/TANK VAPOR RECOVERY/CASING GAS-FIRED STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, EQUIPPED WITH A NORTH AMERICAN GLE BURNER AND FLUE GAS RECIRCULATION (FGR) SYSTEM, SERVED BY THE 25D NEPTUNE AIRPOL CAUSTIC SCRUBBER, LISTED ON PERMIT C-311-36, WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS

C-311-40-22: 58.5 MMBTU/HR SG 25-19 NATURAL/LPG/TANK VAPOR RECOVERY/CASING GAS-FIRED STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE BURNER AND FLUE GAS RECIRCULATION (FGR) SYSTEM, SERVED BY THE NEPTUNE AIRPOL CAUSTIC SCRUBBER, LISTED ON PERMIT C-311-36, WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS

C-311-41-19: 58.5 MMBTU/HR SG 25-20 NATURAL/LPG/TANK VAPOR RECOVERY/CASING GAS-FIRED STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE BURNER AND FLUE GAS RECIRCULATION (FGR) SYSTEM, SERVED BY THE NEPTUNE AIRPOL CAUSTIC SCRUBBER, LISTED ON PERMIT C-311-36, WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS

C-311-76-18: 58.5 MMBTU/HR SG 6-38 NATURAL/LPG/TEOR GAS-FIRED STRUTHERS THERMOFLOOD MODEL OH-50-ND-16XAM STEAM GENERATOR WITH A NORTH AMERICAN MODEL GLE BURNER AND FLUE GAS RECIRCULATION (FGR) SYSTEM

C-311-84-19: 58.5 MMBTU/HR SG 6-37 NATURAL/LPG/TEOR GAS-FIRED STRUTHERS THERMOFLOOD, MODEL OH-5O-ND-16XAM STEAM GENERATOR WITH A NORTH AMERICAN GLE BURNER AND FLUE GAS RECIRCULATION (FGR) SYSTEM

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

Steam Generators with Fuel Sulfur Limits:

The following changes to conditions are typical of all ATCs limiting fuel sulfur content to 5 gr-S/100 dscf to comply with Rule 4320 (C-311-20, '-21, '-22, '-23, '-25, '-28, '-30, '-76, '-83, and '-84):

The following condition was modified to clarify any mixture of gas can be burned:

- This unit shall be fired on PUC-quality natural gas, ~~or a blend of PUC-quality natural gas and~~ well casing, ~~and~~ tank vapor recovery (TVR) gas, or any mixture of these fuels. [District Rule 2201]

The heat input based sulfur emission limit was removed and a new condition limiting fuel sulfur was added:

- Emissions from the steam generator shall not exceed any of the following limits: ~~0.157 lb-SOx/MMBtu,~~ 0.004 lb-PM10/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rule 2201]
- Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rules 4320 and 4801]

The heat input based NO_X emission limit was changed to two significant figures to accurately reflect the limit listed in Rule 4320:

- Except during start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 15 ppmvd NOx @ 3% O2, equivalent to 0.0182 lb-NOx/MMBtu or 50 ppmvd CO @ 3% O2, equivalent to 0.037 lb-CO/MMBtu. [District Rules 2201, 4301, 4305, ~~and~~ 4306, and 4320]

The following condition was added to enforce the fuel sulfur limit of Rule 4320:

- Fuel sulfur content and higher heating value (hhv) of each fuel source shall be certified by third party fuel supplier or tested in accordance with procedures outlined on this permit. [District Rules 4305, 4306, and 4320]

The following condition was modified to clarify that fuel sulfur testing is required for any noncertified gaseous fuel being burned:

- ~~When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis~~ If the unit is fired on noncertified gaseous fuel, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel 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, 9.3.2]

The testing methods were removed from the following conditions and added as part of a general test methods condition:

- 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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, 9.3.2]

- ~~NOx 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 2520, 9.3.2, 4305, 6.2 and 4306, 6.2]~~

- ~~CO emissions for source test purposes shall be determined using EPA Method 10, 10B, or ARB Method 100. [District Rule 2520, 9.3.2 and 4305]~~

- ~~Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 2520, 9.3.2, 4305, 6.2 and 4306, 6.2]~~

- The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, Stack Gas Oxygen - EPA Method 3 or 3A or ARB Method 100, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D1072, D3031, D4084 D3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306, and 4320]

The following source test condition was modified to clarify that source testing was not just limited to natural gas combustion:

- Source testing to measure ~~natural gas-combustion~~ NOx 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, ~~and~~ 4306, and 4320]

The following condition was added to enforce the annual fuel heat input limit:

- Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such 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 and Rule 4320]

The following condition was added to clarify that SJVAPCD rules supersede applicable individual county rules:

- 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), and 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]

Steam Generators Exhausting to Scrubber:

These ATCs clarify equipment descriptions and either limit fuel sulfur or limit exhaust SO_2 via a scrubber for Rule 4320 compliance. The following changes to conditions are typical of all ATCs using an exhaust sulfur scrubber to comply with Rule 4320 (C-311-36, '-37, '-38, '-39, '-40, and '-41):

The following condition was modified to clarify any mixture of gas can be burned:

- This unit shall be fired on PUC-quality natural gas, ~~or a blend of PUC-quality natural gas and~~ well casing, ~~and~~ tank vapor recovery (TVR) gas, or any mixture of these fuels. [District Rule 2201]

The following condition was condensed:

- Total ~~LPG, casing gas, waste gas, and natural gas~~ fuel consumption shall not exceed 435,000 MMBtu/year. [District NSR Rule]

The following conditions were added for Rule 4320 compliance:

- Whenever well casing vapors and/or tank vapor recovery gas are being burned in this unit, the SO2 scrubber shall operate and shall reduce SO2 emissions by 95% by weight, or shall limit exhaust SO2 to less than or equal to 9 ppmv corrected to 3.0% oxygen. [District Rules 2201 and 4320]

- Whenever the unit is switched to scrubbed operation, compliance source testing for SOx shall be conducted within 60 days of initial scrubbing date unless source testing under scrubbed operation has occurred within the previous 12 months. [District Rules 2201 and 4320]

- PUC quality gas shall be combusted in this unit whenever the scrubber is not being operated. [District Rule 2201]

- Fuel sulfur content and higher heating value (hhv) of each fuel source shall be certified by third party fuel supplier or tested in accordance with procedures outlined on this permit. [District Rules 4305, 4306, and 4320]

- All instrument calibration data shall be kept on file including the date of calibration. The calibration date shall not exceed 3 months prior to the date the stack concentrations are measured and recorded. [District Rules 4305, 4306, and 4320]

The heat input based sulfur emission limit was removed and a new condition limiting fuel sulfur was added:

- Emissions from the steam generator shall not exceed any of the following limits: ~~0.157 lb-SOx/MMBtu,~~ 0.004 lb-PM10/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rule 2201]

- Fuel gas shall not contain no more than 5 grains of total sulfur per 100 standard cubic feet. [District Rules 4320 and 4801]

The NO_X and CO limits were moved into a separate condition as shown:

- ~~Except during start-up and shutdown periods, emissions from the steam generator shall not exceed any of the following limits: 15 ppmvd NOx @ 3% O2 or 0.018 lb-NOx/MMBtu, 0.052 lb-SOx/MMBtu, 0.014 lb-PM10/MMBtu, 50 ppmvd CO @ 3% O2 or 0.037 lb-CO/MMBtu, or 0.0085 lb-VOC/MMBtu. [District Rules 2201, 4301, 4305, and 4306]~~

- Emissions from the steam generator shall not exceed any of the following limits: 0.052 lb-SOx/MMBtu, 0.014 lb-PM10/MMBtu or 0.0085 lb-VOC/MMBtu. [District Rules 2201 and 4320]

- Except during start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 15 ppmvd NOx @ 3% O2, equivalent to 0.018 lb-NOx/MMBtu or 50 ppmvd CO @ 3% O2, equivalent to 0.037 lb-CO/MMBtu. [District Rules 2201, 4301, 4305, 4306, and 4320]

The testing methods were removed from the following conditions and added as part of a general test methods condition:

- 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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, 9.3.2]

- ~~NOx 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 2520, 9.3.2, 4305, 6.2 and 4306, 6.2]~~

- ~~CO emissions for source test purposes shall be determined using EPA Method 10, 10B, or ARB Method 100. [District Rule 2520, 9.3.2 and 4305]~~

- ~~Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 2520, 9.3.2, 4305, 6.2 and 4306, 6.2]~~

- The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, Stack Gas Oxygen - EPA Method 3 or 3A or ARB Method 100, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D1072, D3031, D4084 D3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306, and 4320]

The following condition was modified to clarify that fuel sulfur testing is required for any noncertified gaseous fuel being burned:

- ~~When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis~~ If the unit is fired on noncertified gaseous fuel, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel 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, 9.3.2]

The following source test condition was modified to clarify that source testing was not just limited to natural gas combustion:

- Source testing to measure ~~natural gas combustion~~ NOx 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, ~~and~~ 4306, and 4320]

The following condition was modified to simplify the requirements of the MMBtu record (that it is comprised of hhv and gas volume) and to remove the overlapping requirement of the 5 year record retention requirement:

- Permittee shall maintain records of ~~annual heat input (MMBtu) for this unit on a calendar year basis. Such 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~~ higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rules ~~1070 and Rule 4320~~2201]

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 Permits C-311-20-20, '-21-11, '-25-10, '-28-20, '-30-19, '-36-21, '-37-26, '-38-25, '-39-23, '-40-22, '-41-19, '-41-19, '-76-18, and '-84-19
B. Authorities to Construct C-311-20-16, '-21-7, '-25-6, '-28-16, '-30-16, '-36-17, '-37-21, '-38-21, '-39-19, '-40-18, '-41-15, '-76-15, and '-84-16
C. Emissions Increases
D. Application
E. Previous Title V Operating Permits C-311-20-14, '-21-5, '-25-4, '-28-14, '-30-14, '-36-13, '-37-17, '-38-18, '-39-17, '-40-16, '-41-13, '-76-10, and '-84-10

ATTACHMENT A

Proposed Modified Title V Operating Permits
(C-311-20-20, '-21-11, '-25-10, '-28-20, '-30-19,
'-36-21, '-37-26, '-38-25, '-39-23, '-40-22,
'-41-19, '-41-19, '-76-18, and '-84-19)

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-311-20-20

EXPIRATION DATE: 12/31/2016

DRAFT

SECTION: 13D **TOWNSHIP:** 20S **RANGE:** 14E

EQUIPMENT DESCRIPTION:
58.5 MMBTU/HR SG 13-04 NATURAL/TANK VAPOR RECOVERY/CASING GAS-FIRED STRUTHERS THERMOFLOOD STEAM GENERATOR WITH A NORTH AMERICAN GLE BURNER

PERMIT UNIT REQUIREMENTS

1. This unit shall be fired on PUC-quality natural gas, well casing gas, tank vapor recovery (TVR) gas, or any mixture of these fuels. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Total fuel consumption shall not exceed either of the following limits: 1,404 MMBtu/day or 457,800 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rules 4320 and 4801] Federally Enforceable Through Title V Permit
5. Emissions from the steam generator shall not exceed any of the following limits: 0.004 lb-PM10/MMBtu or 0.003 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
6. Except during start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 15 ppmvd NOx @ 3% O2, equivalent to 0.018 lb-NOx/MMBtu or 50 ppmvd CO @ 3% O2, equivalent to 0.037 lb-CO/MMBtu. [District Rules 2201, 4301, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
7. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 50.5 lb-NOx/day, 8,332 lb-NOx/yr, 51.9 lb-CO/day, or 16,939 lb-CO/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
10. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

11. Fuel sulfur content and higher heating value (hhv) of each fuel source shall be certified by third party fuel supplier or tested in accordance with procedures outlined on this permit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

12. If the unit is fired on noncertified gaseous fuel, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit

13. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months. 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, 9.3.2] Federally Enforceable Through Title V Permit

14. Source testing to measure NOx 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

15. NOx, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

16. 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

17. 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

18. Source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

19. The results of each source test shall be submitted to the District within 60 days after the source test. [District Rule 1081] Federally Enforceable Through Title V Permit

20. 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 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

21. 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

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

22. 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
23. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
24. All instrument calibration data shall be kept on file including the date of calibration . The calibration date shall not exceed 3 months prior to the date the stack concentrations are measured and recorded. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
25. 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] Federally Enforceable Through Title V Permit
26. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, Stack Gas Oxygen - EPA Method 3 or 3A or ARB Method 100, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D1072, D3031, D4084 D3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. Well casing gas shall be sampled monthly from the gas line down stream from the point where the casing gas from all 4 casing collection systems is connected together and upstream from the point where the well casing gas is fed to the steam generators. The gas sample shall be analyzed by the laboratory for total sulfur and the results shall be given in grain/100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
28. Permittee shall maintain monthly records of the total amount of well casing gas consumed by the entire bank of steam generators (in MMscf), along with the date and time of the measurement. [District Rule 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
29. Permittee shall maintain monthly records of the total amount of PUC grade gas consumed by the entire bank of steam generators (in MMscf), along with the date and time of the measurement. [District Rule 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
30. Natural gas sulfur content and higher heating value (hhv) shall be certified by a third party fuel supplier of each fuel source or natural gas shall be tested for sulfur content and higher heating value (hhv) monthly. Casing gas shall be tested for sulfur content and higher heating value (hhv) not less than monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
31. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit
32. Copies of all gas purchase contracts, 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, fuel source, 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

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

33. 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, 2520, 9.4.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

34. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 1081 (Amended December 16, 1993), 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

35. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 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] Federally Enforceable Through Title V Permit

36. {1669} This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

37. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit

38. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such 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 and Rule 4320] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-311-21-11

EXPIRATION DATE: 12/31/2016

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SECTION: 13 **TOWNSHIP:** 20S **RANGE:** 14

EQUIPMENT DESCRIPTION:
58.5 MBTU/HR SG 13-05 NATURAL/TANK VAPOR RECOVERY/CASING GAS-FIRED STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE BURNER

PERMIT UNIT REQUIREMENTS

1. This unit shall be fired on PUC-quality natural gas, well casing gas, tank vapor recovery (TVR) gas, or any mixture of these fuels. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Total fuel consumption shall not exceed either of the following limits: 1,404 MMBtu/day or 457,800 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rules 4320 and 4801] Federally Enforceable Through Title V Permit
5. Emissions from the steam generator shall not exceed any of the following limits: 0.004 lb-PM10/MMBtu or 0.08 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
6. Except during start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 15 ppmvd NOx @ 3% O2, equivalent to 0.018 lb-NOx/MMBtu or 50 ppmvd CO @ 3% O2, equivalent to 0.037 lb-CO/MMBtu. [District Rules 2201, 4301, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
7. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 50.5 lb-NOx/day, 8,332 lb-NOx/yr, 51.9 lb-CO/day, or 16,939 lb-CO/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
10. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

11. Fuel sulfur content and higher heating value (hhv) of each fuel source shall be certified by third party fuel supplier or tested in accordance with procedures outlined on this permit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

12. If the unit is fired on noncertified gaseous fuel, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit

13. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months. 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, 9.3.2] Federally Enforceable Through Title V Permit

14. Source testing to measure NOx 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

15. NOx, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

16. 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

17. 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

18. Source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

19. The results of each source test shall be submitted to the District within 60 days after the source test. [District Rule 1081] Federally Enforceable Through Title V Permit

20. 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 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

21. 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

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

22. 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

23. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

24. All instrument calibration data shall be kept on file including the date of calibration . The calibration date shall not exceed 3 months prior to the date the stack concentrations are measured and recorded. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

25. 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] Federally Enforceable Through Title V Permit

26. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, Stack Gas Oxygen - EPA Method 3 or 3A or ARB Method 100, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D1072, D3031, D4084 D3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

27. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit

28. Copies of all gas purchase contracts, 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, fuel source, 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

29. 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, 2520, 9.4.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

30. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 1081 (Amended December 16, 1993), 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

31. 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), and 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] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

32. {1669} This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

33. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit

34. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such 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 and Rule 4320] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-311-25-10 **EXPIRATION DATE:** 12/31/2016

SECTION: 13 **TOWNSHIP:** 20S **RANGE:** 14E

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EQUIPMENT DESCRIPTION:
58.5 MMBTU/HR SG 13-09 NATURAL/LPG/TANK VAPOR RECOVERY/CASING GAS-FIRED STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE BURNER AND FLUE GAS RECIRCULATION (FGR) SYSTEM

PERMIT UNIT REQUIREMENTS

1. This unit shall be fired on PUC-quality natural gas, LPG, well casing gas, tank vapor recovery (TVR) gas, or any mixture of these fuels. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Combined natural , well casing, and TVR gas consumption shall not exceed either of the following limits: 1,404 million MMBtu/day or 434,700 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
3. LPG consumption shall not exceed either of the following limits: 1,404 MMBtu/day or 435,000 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rules 4320 and 4801] Federally Enforceable Through Title V Permit
6. Emissions from the steam generator shall not exceed any of the following limits: 0.045 lb-PM10/MMBtu or 0.009 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
7. Except during start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 15 ppmvd NOx @ 3% O2, equivalent to 0.018 lb-NOx/MMBtu or 50 ppmvd CO @ 3% O2, equivalent to 0.037 lb-CO/MMBtu. [District Rules 2201, 4301, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
8. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 50.5 lb-NOx/day, 7,912 lb-NOx/yr, 51.9 lb-CO/day, or 16,095 lb-CO/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

11. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
12. Fuel sulfur content and higher heating value (hhv) of each fuel source shall be certified by third party fuel supplier or tested in accordance with procedures outlined on this permit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
13. If the unit is fired on noncertified gaseous fuel, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
14. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months. 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, 9.3.2] Federally Enforceable Through Title V Permit
15. Source testing to measure NOx 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
16. NOx, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
17. 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
18. 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
19. Source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). 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
20. The results of each source test shall be submitted to the District within 60 days after the source test. [District Rule 1081] Federally Enforceable Through Title V Permit
21. 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 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

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

22. 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

23. 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

24. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

25. All instrument calibration data shall be kept on file including the date of calibration . The calibration date shall not exceed 3 months prior to the date the stack concentrations are measured and recorded. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

26. 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] Federally Enforceable Through Title V Permit

27. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, Stack Gas Oxygen - EPA Method 3 or 3A or ARB Method 100, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D1072, D3031, D4084 D3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

28. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit

29. Copies of all gas purchase contracts, 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, fuel source, 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

30. 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, 2520, 9.4.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

31. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 1081 (Amended December 16, 1993), 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

32. 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), and 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] Federally Enforceable Through Title V Permit

33. {1669} This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

34. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit

35. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such 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 and Rule 4320] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-311-28-20 **EXPIRATION DATE:** 12/31/2016

SECTION: 13 **TOWNSHIP:** 20S **RANGE:** 14E

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EQUIPMENT DESCRIPTION:
58.5 MMBTU/HR SG 13-12 NATURAL/TANK VAPOR RECOVERY/CASING GAS-FIRED STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, EQUIPPED WITH A NORTH AMERICAN GLE BURNER AND FLUE GAS RECIRCULATION (FGR) SYSTEM

PERMIT UNIT REQUIREMENTS

1. This unit shall be fired on PUC-quality natural gas, well casing gas, tank vapor recovery (TVR) gas, or any mixture of these fuels. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Total fuel consumption shall not exceed either of the following limits: 1,404 MMBtu/day or 457,800 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rules 4320 and 4801] Federally Enforceable Through Title V Permit
5. Emissions from the steam generator shall not exceed any of the following limits: 0.005 lb-PM10/MMBtu or 0.008 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
6. Except during start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 15 ppmvd NOx @ 3% O2, equivalent to 0.018 lb-NOx/MMBtu or 50 ppmvd CO @ 3% O2, equivalent to 0.037 lb-CO/MMBtu. [District Rules 2201, 4301, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
7. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
9. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
10. Fuel sulfur content and higher heating value (hhv) of each fuel source shall be certified by third party fuel supplier or tested in accordance with procedures outlined on this permit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

11. If the unit is fired on noncertified gaseous fuel, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
12. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months. 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, 9.3.2] Federally Enforceable Through Title V Permit
13. Source testing to measure NOx 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
14. NOx, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. 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
16. 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
17. Source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). 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
18. The results of each source test shall be submitted to the District within 60 days after the source test. [District Rule 1081] Federally Enforceable Through Title V Permit
19. 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 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
20. 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
21. 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

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

22. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

23. All instrument calibration data shall be kept on file including the date of calibration . The calibration date shall not exceed 3 months prior to the date the stack concentrations are measured and recorded. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

24. 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] Federally Enforceable Through Title V Permit

25. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, Stack Gas Oxygen - EPA Method 3 or 3A or ARB Method 100, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D1072, D3031, D4084 D3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

26. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit

27. Copies of all gas purchase contracts, 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, fuel source, 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

28. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

29. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 1081 (Amended December 16, 1993), 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

30. 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), and 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] Federally Enforceable Through Title V Permit

31. {1669} This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

32. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

33. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such 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 and Rule 4320] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-311-30-19 **EXPIRATION DATE:** 12/31/2016

SECTION: 13 **TOWNSHIP:** 20S **RANGE:** 14E

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EQUIPMENT DESCRIPTION:
62.5 MMBTU/HR SG 13-04 NATURAL/TANK VAPOR RECOVERY/CASING GAS-FIRED STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN BURNER, AND A FLUE GAS RECIRCULATION (FGR) SYSTEM

PERMIT UNIT REQUIREMENTS

1. This unit shall be fired on PUC-quality natural gas, LPG, well casing gas, tank vapor recovery (TVR) gas, or any mixture of these fuels. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Total fuel consumption shall not exceed 457,800 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rules 4320 and 4801] Federally Enforceable Through Title V Permit
5. Emissions from the steam generator shall not exceed any of the following limits: 0.005 lb-PM10/MMBtu or 0.003 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
6. Except during start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 15 ppmvd NOx @ 3% O2, equivalent to 0.018 lb-NOx/MMBtu or 50 ppmvd CO @ 3% O2, equivalent to 0.037 lb-CO/MMBtu. [District Rules 2201, 4301, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
7. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
9. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
10. Fuel sulfur content and higher heating value (hhv) of each fuel source shall be certified by third party fuel supplier or tested in accordance with procedures outlined on this permit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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

11. If the unit is fired on noncertified gaseous fuel, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit

12. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months. 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, 9.3.2] Federally Enforceable Through Title V Permit

13. Source testing to measure NOx 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

14. NOx, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

15. 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

16. 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

17. Source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). 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

18. The results of each source test shall be submitted to the District within 60 days after the source test. [District Rule 1081] Federally Enforceable Through Title V Permit

19. 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 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

20. 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

21. 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

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22. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

23. All instrument calibration data shall be kept on file including the date of calibration . The calibration date shall not exceed 3 months prior to the date the stack concentrations are measured and recorded. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

24. 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] Federally Enforceable Through Title V Permit

25. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, Stack Gas Oxygen - EPA Method 3 or 3A or ARB Method 100, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D1072, D3031, D4084 D3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

26. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit

27. Copies of all gas purchase contracts, 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, fuel source, 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

28. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

29. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 1081 (Amended December 16, 1993), 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

30. 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), and 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] Federally Enforceable Through Title V Permit

31. {1669} This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

32. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

33. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such 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 and Rule 4320] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-311-36-21

EXPIRATION DATE: 12/31/2016

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SECTION: 25 **TOWNSHIP:** 20S **RANGE:** 14E

EQUIPMENT DESCRIPTION:
58.5 MMBTU/HR SG 25-15 NATURAL/LPG/TANK VAPOR RECOVERY/CASING GAS-FIRED STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN MODEL GLE BURNER AND FLUE GAS RECIRCULATION (FGR) SYSTEM, SERVED BY THE 25D NEPTUNE AIRPOL CAUSTIC SCRUBBER, ALSO SERVING STEAM GENERATORS LISTED ON PERMITS C-311-37, '-38, '-39, '-40, AND '-41, WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS

PERMIT UNIT REQUIREMENTS

1. This unit shall be fired on PUC-quality natural gas, LPG, well casing gas, tank vapor recovery (TVR) gas, or any mixture of these fuels. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Total fuel consumption shall not exceed 435,000 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Whenever well casing vapors and/or tank vapor recovery gas are being burned in this unit, the SO2 scrubber shall operate and shall reduce SO2 emissions by 95% by weight, or shall limit exhaust SO2 to less than or equal to 9 ppmv corrected to 3.0% oxygen. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
5. Whenever the unit is switched to scrubbed operation, compliance source testing for SOx shall be conducted within 60 days of initial scrubbing date unless source testing under scrubbed operation has occurred within the previous 12 months. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
6. PUC quality gas shall be combusted in this unit whenever the scrubber is not being operated. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Scrubber liquor pH shall be maintained between 6.5 and 8.0. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Tray packing flowrate shall be operated at 700 to 840 gallons/minute. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Quench flowrate shall be operated at 145 to 185 gallons/minute. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Emissions from the steam generator shall not exceed any of the following limits: 0.052 lb-SOx/MMBtu, 0.014 lb-PM10/MMBtu or 0.0085 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
11. Except during start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 15 ppmvd NOx @ 3% O2, equivalent to 0.018 lb-NOx/MMBtu or 50 ppmvd CO @ 3% O2, equivalent to 0.037 lb-CO/MMBtu. [District Rules 2201, 4301, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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

12. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

13. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 50.5 lb-NOx/day, 7,830 lb-NOx/yr, 49.1 lb-CO/day, or 16,095 lb-CO/yr. [District Rule 2201] Federally Enforceable Through Title V Permit

14. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

15. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

16. Fuel sulfur content and higher heating value (hhv) of each fuel source shall be certified by third party fuel supplier or tested in accordance with procedures outlined on this permit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

17. If the unit is fired on noncertified gaseous fuel, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit

18. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months. 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, 9.3.2] Federally Enforceable Through Title V Permit

19. Source testing to measure NOx 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

20. NOx, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

21. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

22. The 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

23. Source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

24. The results of each source test shall be submitted to the District within 60 days after the source test. [District Rule 1081] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

25. 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 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

26. 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

27. 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

28. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

29. All instrument calibration data shall be kept on file including the date of calibration. The calibration date shall not exceed 3 months prior to the date the stack concentrations are measured and recorded. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

30. 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] Federally Enforceable Through Title V Permit

31. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, Stack Gas Oxygen - EPA Method 3 or 3A or ARB Method 100, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D1072, D3031, D4084 D3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

32. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit

33. Copies of all gas purchase contracts, 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, fuel source, 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

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

34. Daily records of the tray packing flowrate and the quench flowrate shall be maintained. [District Rule 1070 and 2520, 9.5.2] Federally Enforceable Through Title V Permit

35. Permittee shall measure and record the BTU content of the gas burned at the time of NOx testing, except for natural gas purchased from a PUC regulated utility. [District Rules 2201 and 4801] Federally Enforceable Through Title V Permit

36. 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, 2520, 9.4.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

37. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 1081 (Amended December 16, 1993), 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

38. 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), and 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] Federally Enforceable Through Title V Permit

39. {1669} This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

40. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit

41. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such 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 and Rule 4320] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

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PERMIT UNIT: C-311-37-26 **EXPIRATION DATE:** 12/31/2016

SECTION: 25 **TOWNSHIP:** 20S **RANGE:** 14E

EQUIPMENT DESCRIPTION:
62.5 MMBTU/HR SG 25-16 NATURAL/LPG/TANK VAPOR RECOVERY/CASING GAS-FIRED STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN MODEL GLE BURNER AND FLUE GAS RECIRCULATION (FGR) SYSTEM, SERVED BY THE 25D NEPTUNE AIRPOL CAUSTIC SCRUBBER, LISTED ON PERMIT C-311-36, WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS

PERMIT UNIT REQUIREMENTS

1. This unit shall be fired on PUC-quality natural gas, LPG, well casing gas, tank vapor recovery (TVR) gas, or any mixture of these fuels. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Total fuel consumption shall not exceed either of the following limits: 1,404 MMBtu/day or 457,800 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Whenever well casing vapors and/or tank vapor recovery gas are being burned in this unit, the SO2 scrubber shall operate and shall reduce SO2 emissions by 95% by weight, or shall limit exhaust SO2 to less than or equal to 9 ppmv corrected to 3.0% oxygen. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
5. Whenever the unit is switched to scrubbed operation, compliance source testing for SOx shall be conducted within 60 days of initial scrubbing date unless source testing under scrubbed operation has occurred within the previous 12 months. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
6. PUC quality gas shall be combusted in this unit whenever the scrubber is not being operated. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Scrubber liquor pH shall be maintained between 6.5 and 8.0. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Tray packing flowrate shall be operated at 700 to 840 gallons/minute. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Quench flowrate shall be operated at 145 to 185 gallons/minute. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Emissions from the steam generator shall not exceed any of the following limits: 0.052 lb-SOx/MMBtu, 0.014 lb-PM10/MMBtu or 0.008 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
11. Except during start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 15 ppmvd NOx @ 3% O2, equivalent to 0.018 lb-NOx/MMBtu or 50 ppmvd CO @ 3% O2, equivalent to 0.037 lb-CO/MMBtu. [District Rules 2201, 4301, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

12. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

13. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 50.5 lb-NOx/day, 8,240 lb-NOx/yr, 85.6 lb-CO/day, or 16,939 lb-CO/yr. [District Rule 2201] Federally Enforceable Through Title V Permit

14. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

15. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

16. Fuel sulfur content and higher heating value (hhv) of each fuel source shall be certified by third party fuel supplier or tested in accordance with procedures outlined on this permit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

17. If the unit is fired on noncertified gaseous fuel, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit

18. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months. 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 Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit

19. Source testing to measure NOx 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

20. NOx, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

21. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

22. The 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

23. Source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

24. The results of each source test shall be submitted to the District within 60 days after the source test. [District Rule 1081] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

25. 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 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

26. 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

27. 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

28. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

29. All instrument calibration data shall be kept on file including the date of calibration . The calibration date shall not exceed 3 months prior to the date the stack concentrations are measured and recorded. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

30. 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] Federally Enforceable Through Title V Permit

31. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, Stack Gas Oxygen - EPA Method 3 or 3A or ARB Method 100, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D1072, D3031, D4084 D3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

32. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit

33. Copies of all gas purchase contracts, 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, fuel source, 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

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

34. Daily records of the tray packing flowrate and the quench flowrate shall be maintained. [District Rule 1070 and 2520, 9.5.2] Federally Enforceable Through Title V Permit

35. Permittee shall measure and record the BTU content of the gas burned at the time of NOx testing, except for natural gas purchased from a PUC regulated utility. [District Rules 2201 and 4801] Federally Enforceable Through Title V Permit

36. 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, 2520, 9.4.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

37. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 1081 (Amended December 16, 1993), 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

38. 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), and 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] Federally Enforceable Through Title V Permit

39. {1669} This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

40. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit

41. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such 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 and Rule 4320] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

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PERMIT UNIT: C-311-38-25 **EXPIRATION DATE:** 12/31/2016

SECTION: 25 **TOWNSHIP:** 20S **RANGE:** 14E

EQUIPMENT DESCRIPTION:
58.5 MMBTU/HR SG 25-17 NATURAL/LPG/TANK VAPOR RECOVERY/CASING GAS-FIRED STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE BURNER AND FLUE GAS RECIRCULATION (FGR) SYSTEM, SERVED BY THE 25D NEPTUNE AIRPOL CAUSTIC SCRUBBER, LISTED ON PERMIT C-311-36, WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS

PERMIT UNIT REQUIREMENTS

1. This unit shall be fired on PUC-quality natural gas, LPG, well casing gas, tank vapor recovery (TVR) gas, or any mixture of these fuels. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Total fuel consumption shall not exceed either of the following limits: 1,404 MMBtu/day or 457,800 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Whenever well casing vapors and/or tank vapor recovery gas are being burned in this unit, the SO2 scrubber shall operate and shall reduce SO2 emissions by 95% by weight, or shall limit exhaust SO2 to less than or equal to 9 ppmv corrected to 3.0% oxygen. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
5. Whenever the unit is switched to scrubbed operation, compliance source testing for SOx shall be conducted within 60 days of initial scrubbing date unless source testing under scrubbed operation has occurred within the previous 12 months. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
6. PUC quality gas shall be combusted in this unit whenever the scrubber is not being operated. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Scrubber liquor pH shall be maintained between 6.5 and 8.0. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Tray packing flowrate shall be operated at 700 to 840 gallons/minute. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Quench flowrate shall be operated at 145 to 185 gallons/minute. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Emissions from the steam generator shall not exceed any of the following limits: 0.052 lb-SOx/MMBtu, 0.045 lb-PM10/MMBtu or 0.008 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
11. Except during start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 15 ppmvd NOx @ 3% O2, equivalent to 0.018 lb-NOx/MMBtu or 50 ppmvd CO @ 3% O2, equivalent to 0.037 lb-CO/MMBtu. [District Rules 2201, 4301, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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

12. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

13. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 50.5 lb-NOx/day, 8,332 lb-NOx/yr, 51.9 lb-CO/day, or 16,939 lb-CO/yr. [District Rule 2201] Federally Enforceable Through Title V Permit

14. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

15. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

16. Fuel sulfur content and higher heating value (hhv) of each fuel source shall be certified by third party fuel supplier or tested in accordance with procedures outlined on this permit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

17. If the unit is fired on noncertified gaseous fuel, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit

18. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months. 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 Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit

19. Source testing to measure NOx 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

20. NOx, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

21. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

22. The 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

23. Source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

24. The results of each source test shall be submitted to the District within 60 days after the source test. [District Rule 1081] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

25. 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 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

26. 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

27. 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

28. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

29. All instrument calibration data shall be kept on file including the date of calibration . The calibration date shall not exceed 3 months prior to the date the stack concentrations are measured and recorded. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

30. 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] Federally Enforceable Through Title V Permit

31. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, Stack Gas Oxygen - EPA Method 3 or 3A or ARB Method 100, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D1072, D3031, D4084 D3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

32. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit

33. Copies of all gas purchase contracts, 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, fuel source, 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

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

34. Daily records of the tray packing flowrate and the quench flowrate shall be maintained. [District Rule 1070 and 2520, 9.5.2] Federally Enforceable Through Title V Permit

35. Permittee shall measure and record the BTU content of the gas burned at the time of NOx testing, except for natural gas purchased from a PUC regulated utility. [District Rules 2201 and 4801] Federally Enforceable Through Title V Permit

36. 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, 2520, 9.4.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

37. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 1081 (Amended December 16, 1993), 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

38. 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), and 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] Federally Enforceable Through Title V Permit

39. {1669} This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

40. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit

41. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such 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 and Rule 4320] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-311-39-23

EXPIRATION DATE: 12/31/2016

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SECTION: 25 **TOWNSHIP:** 20S **RANGE:** 14E

EQUIPMENT DESCRIPTION:
58.5 MMBTU/HR SG 25-18 NATURAL/LPG/TANK VAPOR RECOVERY/CASING GAS-FIRED STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, EQUIPPED WITH A NORTH AMERICAN GLE BURNER AND FLUE GAS RECIRCULATION (FGR) SYSTEM, SERVED BY THE 25D NEPTUNE AIRPOL CAUSTIC SCRUBBER, LISTED ON PERMIT C-311-36, WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS

PERMIT UNIT REQUIREMENTS

1. This unit shall be fired on PUC-quality natural gas, LPG, well casing gas, tank vapor recovery (TVR) gas, or any mixture of these fuels. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Total fuel consumption shall not exceed either of the following limits: 1,404 MMBtu/day or 457,800 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Whenever well casing vapors and/or tank vapor recovery gas are being burned in this unit, the SO2 scrubber shall operate and shall reduce SO2 emissions by 95% by weight, or shall limit exhaust SO2 to less than or equal to 9 ppmv corrected to 3.0% oxygen. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
5. Whenever the unit is switched to scrubbed operation, compliance source testing for SOx shall be conducted within 60 days of initial scrubbing date unless source testing under scrubbed operation has occurred within the previous 12 months. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
6. PUC quality gas shall be combusted in this unit whenever the scrubber is not being operated. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Scrubber liquor pH shall be maintained between 6.5 and 8.0. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Tray packing flowrate shall be operated at 700 to 840 gallons/minute. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Quench flowrate shall be operated at 145 to 185 gallons/minute. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Emissions from the steam generator shall not exceed any of the following limits: 0.052 lb-SOx/MMBtu, 0.045 lb-PM10/MMBtu or 0.008 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
11. Except during start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 15 ppmvd NOx @ 3% O2, equivalent to 0.018 lb-NOx/MMBtu or 50 ppmvd CO @ 3% O2, equivalent to 0.037 lb-CO/MMBtu. [District Rules 2201, 4301, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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

12. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

13. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

14. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

15. Fuel sulfur content and higher heating value (hhv) of each fuel source shall be certified by third party fuel supplier or tested in accordance with procedures outlined on this permit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

16. If the unit is fired on noncertified gaseous fuel, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit

17. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months. 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 Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit

18. Source testing to measure NOx 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. NOx, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

20. 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

21. 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

22. Source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

23. The results of each source test shall be submitted to the District within 60 days after the source test. [District Rule 1081] Federally Enforceable Through Title V Permit

24. 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 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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25. 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

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, 4306, and 4320] Federally Enforceable Through Title V Permit

27. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

28. All instrument calibration data shall be kept on file including the date of calibration . The calibration date shall not exceed 3 months prior to the date the stack concentrations are measured and recorded. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

29. 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] Federally Enforceable Through Title V Permit

30. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, Stack Gas Oxygen - EPA Method 3 or 3A or ARB Method 100, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D1072, D3031, D4084 D3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

31. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit

32. Copies of all gas purchase contracts, 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, fuel source, 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

33. Daily records of the tray packing flowrate and the quench flowrate shall be maintained. [District Rule 1070 and 2520, 9.5.2] Federally Enforceable Through Title V Permit

34. Permittee shall measure and record the BTU content of the gas burned at the time of NOx testing, except for natural gas purchased from a PUC regulated utility. [District Rules 2201 and 4801] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

35. 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, 2520, 9.4.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

36. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 1081 (Amended December 16, 1993), 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

37. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 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] Federally Enforceable Through Title V Permit

38. {1669} This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

39. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit

40. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such 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 and Rule 4320] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-311-40-22 **EXPIRATION DATE:** 12/31/2016

SECTION: 25 **TOWNSHIP:** 20S **RANGE:** 14E

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EQUIPMENT DESCRIPTION:
58.5 MMBTU/HR SG 25-19 NATURAL/LPG/TANK VAPOR RECOVERY/CASING GAS-FIRED STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE BURNER AND FLUE GAS RECIRCULATION (FGR) SYSTEM, SERVED BY THE NEPTUNE AIRPOL CAUSTIC SCRUBBER, LISTED ON PERMIT C-311-36, WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS

PERMIT UNIT REQUIREMENTS

1. This unit shall be fired on PUC-quality natural gas, LPG, well casing gas, tank vapor recovery (TVR) gas, or any mixture of these fuels. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Total fuel consumption shall not exceed 434,700 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Whenever well casing vapors and/or tank vapor recovery gas are being burned in this unit, the SO2 scrubber shall operate and shall reduce SO2 emissions by 95% by weight, or shall limit exhaust SO2 to less than or equal to 9 ppmv corrected to 3.0% oxygen. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
5. Whenever the unit is switched to scrubbed operation, compliance source testing for SOx shall be conducted within 60 days of initial scrubbing date unless source testing under scrubbed operation has occurred within the previous 12 months. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
6. PUC quality gas shall be combusted in this unit whenever the scrubber is not being operated. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Scrubber liquor pH shall be maintained between 6.5 and 8.0. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Tray packing flowrate shall be operated at 700 to 840 gallons/minute. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Quench flowrate shall be operated at 145 to 185 gallons/minute. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Emissions from the steam generator shall not exceed any of the following limits: 0.052 lb-SOx/MMBtu, 0.045 lb-PM10/MMBtu or 0.0055 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
11. Except during start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 15 ppmvd NOx @ 3% O2, equivalent to 0.018 lb-NOx/MMBtu or 50 ppmvd CO @ 3% O2, equivalent to 0.037 lb-CO/MMBtu. [District Rules 2201, 4301, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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

12. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

13. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

14. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

15. Fuel sulfur content and higher heating value (hhv) of each fuel source shall be certified by third party fuel supplier or tested in accordance with procedures outlined on this permit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

16. If the unit is fired on noncertified gaseous fuel, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit

17. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months. 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 Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit

18. Source testing to measure NOx 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. NOx, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

20. 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

21. 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

22. Source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

23. The results of each source test shall be submitted to the District within 60 days after the source test. [District Rule 1081] Federally Enforceable Through Title V Permit

24. 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 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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25. 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
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, 4306, and 4320] Federally Enforceable Through Title V Permit
27. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
28. All instrument calibration data shall be kept on file including the date of calibration . The calibration date shall not exceed 3 months prior to the date the stack concentrations are measured and recorded. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
29. 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] Federally Enforceable Through Title V Permit
30. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, Stack Gas Oxygen - EPA Method 3 or 3A or ARB Method 100, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D1072, D3031, D4084 D3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
31. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit
32. Copies of all gas purchase contracts, 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, fuel source, 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
33. Daily records of the tray packing flowrate and the quench flowrate shall be maintained. [District Rule 1070 and 2520, 9.5.2] Federally Enforceable Through Title V Permit
34. Permittee shall measure and record the BTU content of the gas burned at the time of NOx testing, except for natural gas purchased from a PUC regulated utility. [District Rules 2201 and 4801] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

35. 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, 2520, 9.4.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

36. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 1081 (Amended December 16, 1993), 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

37. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 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] Federally Enforceable Through Title V Permit

38. {1669} This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

39. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit

40. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such 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 and Rule 4320] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

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PERMIT UNIT: C-311-41-19 **EXPIRATION DATE:** 12/31/2016

SECTION: 25 **TOWNSHIP:** 20S **RANGE:** 14E

EQUIPMENT DESCRIPTION:
58.5 MMBTU/HR SG 25-20 NATURAL/LPG/TANK VAPOR RECOVERY/CASING GAS-FIRED STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE BURNER AND FLUE GAS RECIRCULATION (FGR) SYSTEM, SERVED BY THE NEPTUNE AIRPOL CAUSTIC SCRUBBER, LISTED ON PERMIT C-311-36, WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS

PERMIT UNIT REQUIREMENTS

1. This unit shall be fired on PUC-quality natural gas, LPG, well casing gas, tank vapor recovery (TVR) gas, or any mixture of these fuels. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Total fuel consumption shall not exceed 435,000 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Whenever well casing vapors and/or tank vapor recovery gas are being burned in this unit, the SO2 scrubber shall operate and shall reduce SO2 emissions by 95% by weight, or shall limit exhaust SO2 to less than or equal to 9 ppmv corrected to 3.0% oxygen. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
5. Whenever the unit is switched to scrubbed operation, compliance source testing for SOx shall be conducted within 60 days of initial scrubbing date unless source testing under scrubbed operation has occurred within the previous 12 months. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
6. PUC quality gas shall be combusted in this unit whenever the scrubber is not being operated. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Scrubber liquor pH shall be maintained between 6.5 and 8.0. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Tray packing flowrate shall be operated at 700 to 840 gallons/minute. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Quench flowrate shall be operated at 145 to 185 gallons/minute. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Emissions from the steam generator shall not exceed any of the following limits: 0.052 lb-SOx/MMBtu, 0.044 lb-PM10/MMBtu or 0.0085 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
11. Except during start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 15 ppmvd NOx @ 3% O2, equivalent to 0.018 lb-NOx/MMBtu or 50 ppmvd CO @ 3% O2, equivalent to 0.037 lb-CO/MMBtu. [District Rules 2201, 4301, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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

12. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

13. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

14. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

15. Fuel sulfur content and higher heating value (hhv) of each fuel source shall be certified by third party fuel supplier or tested in accordance with procedures outlined on this permit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

16. If the unit is fired on noncertified gaseous fuel, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit

17. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months. 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 Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit

18. Source testing to measure NOx 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. NOx, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

20. 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

21. 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

22. Source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

23. The results of each source test shall be submitted to the District within 60 days after the source test. [District Rule 1081] Federally Enforceable Through Title V Permit

24. 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 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

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

25. 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

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, 4306, and 4320] Federally Enforceable Through Title V Permit

27. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

28. All instrument calibration data shall be kept on file including the date of calibration . The calibration date shall not exceed 3 months prior to the date the stack concentrations are measured and recorded. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

29. 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] Federally Enforceable Through Title V Permit

30. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, Stack Gas Oxygen - EPA Method 3 or 3A or ARB Method 100, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D1072, D3031, D4084 D3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

31. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit

32. Copies of all gas purchase contracts, 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, fuel source, 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

33. Daily records of the tray packing flowrate and the quench flowrate shall be maintained. [District Rule 1070 and 2520, 9.5.2] Federally Enforceable Through Title V Permit

34. Permittee shall measure and record the BTU content of the gas burned at the time of NOx testing, except for natural gas purchased from a PUC regulated utility. [District Rules 2201 and 4801] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

35. 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, 2520, 9.4.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

36. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 1081 (Amended December 16, 1993), 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

37. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 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] Federally Enforceable Through Title V Permit

38. {1669} This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

39. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit

40. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such 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 and Rule 4320] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-311-76-18

EXPIRATION DATE: 12/31/2016

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SECTION: 6C **TOWNSHIP:** 20S **RANGE:** 15E

EQUIPMENT DESCRIPTION:
58.5 MMBTU/HR SG 6-38 NATURAL/LPG/TEOR GAS-FIRED STRUTHERS THERMOFLOOD MODEL OH-50-ND-16XAM STEAM GENERATOR WITH A NORTH AMERICAN MODEL GLE BURNER AND FLUE GAS RECIRCULATION (FGR) SYSTEM

PERMIT UNIT REQUIREMENTS

1. This unit shall be fired on PUC-quality natural gas, LPG, well casing gas, tank vapor recovery (TVR) gas, or any mixture of these fuels. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Total fuel consumption shall not exceed either of the following limits: 1,404 MMBtu/day or 434,700 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rules 4320 and 4801] Federally Enforceable Through Title V Permit
5. Emissions from the steam generator shall not exceed any of the following limits: 0.00675 lb-PM10/MMBtu or 0.0085 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
6. Except during start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 15 ppmvd NOx @ 3% O2, equivalent to 0.018 lb-NOx/MMBtu or 50 ppmvd CO @ 3% O2, equivalent to 0.037 lb-CO/MMBtu. [District Rules 2201, 4301, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
7. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 50.5 lb-NOx/day, 7,825 lb-NOx/yr, 66.4 lb-CO/day, or 16,084 lb-CO/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
10. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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

11. Fuel sulfur content and higher heating value (hhv) of each fuel source shall be certified by third party fuel supplier or tested in accordance with procedures outlined on this permit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

12. If the unit is fired on noncertified gaseous fuel, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit

13. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months. 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, 9.3.2] Federally Enforceable Through Title V Permit

14. Source testing to measure NOx 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

15. NOx, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

16. 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

17. 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

18. Source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

19. The results of each source test shall be submitted to the District within 60 days after the source test. [District Rule 1081] Federally Enforceable Through Title V Permit

20. 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 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

21. 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

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

22. 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

23. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

24. All instrument calibration data shall be kept on file including the date of calibration . The calibration date shall not exceed 3 months prior to the date the stack concentrations are measured and recorded. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

25. 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] Federally Enforceable Through Title V Permit

26. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, Stack Gas Oxygen - EPA Method 3 or 3A or ARB Method 100, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D1072, D3031, D4084 D3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

27. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit

28. Copies of all gas purchase contracts, 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, fuel source, 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

29. 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, 2520, 9.4.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

30. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 1081 (Amended December 16, 1993), 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

31. 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), and 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] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

32. {1669} This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

33. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit

34. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such 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 and Rule 4320] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-311-84-19 **EXPIRATION DATE:** 12/31/2016

SECTION: 6C **TOWNSHIP:** 20S **RANGE:** 15E

EQUIPMENT DESCRIPTION:
58.5 MMBTU/HR SG 6-37 NATURAL/LPG/TEOR GAS-FIRED STRUTHERS THERMOFLOOD, MODEL OH-5O-ND-16XAM STEAM GENERATOR WITH A NORTH AMERICAN GLE BURNER AND FLUE GAS RECIRCULATION (FGR) SYSTEM

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PERMIT UNIT REQUIREMENTS

1. This unit shall be fired on PUC-quality natural gas, LPG, well casing gas, tank vapor recovery (TVR) gas, or any mixture of these fuels. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Total fuel consumption shall not exceed either of the following limits: 1,404 MMBtu/day or 434,700 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rules 4320 and 4801] Federally Enforceable Through Title V Permit
5. Emissions from the steam generator shall not exceed any of the following limits: 0.00675 lb-PM10/MMBtu or 0.0085 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
6. Except during start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 15 ppmvd NOx @ 3% O2, equivalent to 0.018 lb-NOx/MMBtu or 50 ppmvd CO @ 3% O2, equivalent to 0.037 lb-CO/MMBtu. [District Rules 2201, 4301, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
7. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 50.5 lb-NOx/day, 7,825 lb-NOx/yr, 66.4 lb-CO/day, or 16,084 lb-CO/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
10. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

11. Fuel sulfur content and higher heating value (hhv) of each fuel source shall be certified by third party fuel supplier or tested in accordance with procedures outlined on this permit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

12. If the unit is fired on noncertified gaseous fuel, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit

13. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months. 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, 9.3.2] Federally Enforceable Through Title V Permit

14. Source testing to measure NOx 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

15. NOx, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

16. 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

17. 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

18. Source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

19. The results of each source test shall be submitted to the District within 60 days after the source test. [District Rule 1081] Federally Enforceable Through Title V Permit

20. 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 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

21. 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

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

22. 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
23. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
24. All instrument calibration data shall be kept on file including the date of calibration . The calibration date shall not exceed 3 months prior to the date the stack concentrations are measured and recorded. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
25. 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] Federally Enforceable Through Title V Permit
26. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, Stack Gas Oxygen - EPA Method 3 or 3A or ARB Method 100, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D1072, D3031, D4084 D3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit
28. Copies of all gas purchase contracts, 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, fuel source, 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
29. 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, 2520, 9.4.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
30. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 1081 (Amended December 16, 1993), 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
31. 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), and 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] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

32. {1669} This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

33. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit

34. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such 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 and Rule 4320] Federally Enforceable Through Title V Permit

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ATTACHMENT B

Authorities to Construct
(C-311-20-16, '-21-7, '-25-6, '-28-16, '-30-16,
'-36-17, '-37-21, '-38-21, '-39-19, '-40-18,
'-41-15, '-76-15, and '-84-16)

AUTHORITY TO CONSTRUCT

PERMIT NO: C-311-20-16 **ISSUANCE DATE:** 09/22/2009

LEGAL OWNER OR OPERATOR: CHEVRON USA INC
MAILING ADDRESS: PO BOX 1392
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION
FRESNO COUNTY, CA

SECTION: 13D **TOWNSHIP:** 20S **RANGE:** 14E

EQUIPMENT DESCRIPTION:
MODIFICATION OF 58.5 MMBTU/HR NATURAL GAS-FIRED STRUTHERS THERMOFLOOD SG 13-04 STEAM GENERATOR WITH A NORTH AMERICAN GLE LOW-NOX BURNER WITH OXYGEN CONTROLLER: LIMIT SULFUR IN FUEL PER 5.4.1.2 FOR RULE 4320 COMPLIANCE

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] Federally Enforceable Through Title V Permit
2. This unit shall be fired on PUC-quality natural gas, or a blend of PUC-quality natural gas and well casing and tank vapor recovery (TVR) gas. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rule 4320]
4. Total gas consumption of this unit shall not exceed either of the following limits: 1,404 MMBtu/day or 457,800 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
7. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [District Rule 4801] 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

DAVID WARNER, Director of Permit Services
C-311-20-16 : Nov 6 2012 4:33PM – RICKARDK : Joint Inspection NOT Required

8. Emissions of sulfur compounds from this unit shall not exceed 200 lb/hr, calculated as SO2. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit

9. 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 2520, 9.3.2 and 4320]

10. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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, 9.3.2] Federally Enforceable Through Title V Permit

11. 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 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

12. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2, 4305, 4306, and 4320]

13. Nitrogen oxide (NOx) emissions shall not exceed 140 lb/hr, calculated as NO2. [District Rules 4301, 5.2.2, 5.3, and 5.5 and 2520, 9.3.2] Federally Enforceable Through Title V Permit

14. Emissions from the steam generator shall not exceed any of the following limits: 0.0143 lb-SOx/MMBtu, 0.004 lb-PM10/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit

15. Except during start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 15 ppmvd NOx @ 3% O2, equivalent to 0.0182 lb-NOx/MMBtu or 50 ppmvd CO @ 3% O2, equivalent to 0.037 lb-CO/MMBtu. [District Rules 2201, 4301, 4305, 4306, and 4320]

16. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

17. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320]

18. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320]

19. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 50.5 lb-NOx/day, 8,332 lb-NOx/yr, 51.9 lb-CO/day, or 16,939 lb-CO/yr. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

20. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3Aor ARB Method 100, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - EPA Method 11 or 15, ASTM D3246 or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306 and 4320]

21. Source testing to measure natural gas-combustion NOx 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]

22. NOx, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

23. 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]

24. 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 2520, 9.3.2, 4305, 4306, and 4320]

25. 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]

26. Operator shall provide an annual fuel analysis to the District. [District Rule 4320]

27. The results of each source test shall be submitted to the District within 60 days after the source test. [District Rule 1081] Federally Enforceable Through Title V Permit

28. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320]

29. 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 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 2520, 9.3.2, 4305, 4306, and 4320]

30. 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 2520, 9.3.2, 4305, 4306, and 4320]

31. 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 2520, 9.3.2, 4305, 4306, and 4320]

CONDITIONS CONTINUE ON NEXT PAGE

32. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx 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 2520, 9.3.2, 4305, 4306, and 4320]

33. When calculating NOx or CO emission limits based on heat input (lb/MMBtu), fuel hhv shall be certified by third party supplier or determined by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588. [District Rule 2520, 9.3.2, 4305, 4306, and 4320]

34. The well casing gas shall be sampled monthly from the gas line down stream from the point where the casing gas from all 4 casing collection systems is connected together and upstream from the point where the well casing gas is fed to the steam generators. The gas sample shall be analyzed by the laboratory for total sulfur and the results shall be given in grain/100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit

35. Permittee shall maintain monthly records of the total amount of well casing gas consumed by the entire bank of steam generators (in MMscf), along with the date and time of the measurement. [District Rule 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit

36. Permittee shall maintain monthly records of the total amount of PUC grade gas consumed by the entire bank of steam generators (in MMscf), along with the date and time of the measurement. [District Rule 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit

37. Permittee shall maintain records of daily total gas consumption. [District Rule 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit

38. Permittee shall maintain records of all lab analyses. [District Rule 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit

39. Natural gas sulfur content and higher heating value (hhv) shall be certified by a third party fuel supplier of each fuel source or natural gas shall be tested for sulfur content and higher heating value (hhv) monthly. Casing gas shall be tested for sulfur content and higher heating value (hhv) not less than monthly. [District Rule 2201] Federally Enforceable Through Title V Permit

40. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit

41. Copies of all gas purchase contracts, 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, fuel source, 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

42. 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, 2520, 9.4.2, 4305, 4306, and 4320]

43. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 1081 (Amended December 16, 1993), 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

44. 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), and 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] Federally Enforceable Through Title V Permit

45. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

AUTHORITY TO CONSTRUCT

PERMIT NO: C-311-21-7 **ISSUANCE DATE:** 09/22/2009

LEGAL OWNER OR OPERATOR: CHEVRON USA INC
MAILING ADDRESS: PO BOX 1392
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION
FRESNO COUNTY, CA

SECTION: 13 **TOWNSHIP:** 20S **RANGE:** 14

EQUIPMENT DESCRIPTION:
MODIFICATION OF 58.5 MBTU/HR SG 13-5 STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE LOW-NOX BURNER: LIMIT SULFUR IN FUEL PER 5.4.1.2 FOR RULE 4320 COMPLIANCE

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] Federally Enforceable Through Title V Permit
2. Authority to Construct (ATC) C-311-21-6 shall be implemented prior to or concurrently with this ATC. [District Rule 2201]
3. No emission factor and no emission shall be greater for the alternate equipment than for the proposed equipment. No changes in the hours of operation, operating rate, throughput, or firing rate may be authorized for any alternate equipment. [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
6. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (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

DAVID WARNER, Director of Permit Services
C-311-21-7 : Nov 6 2012 4:33PM -- RICKARDK : Joint Inspection NOT Required

7. This unit shall be fired on PUC-quality natural gas, or a blend of PUC-quality natural gas and well casing and tank vapor recovery (TVR) gas. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rule 4320]
9. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201]
10. Total gas consumption shall not exceed either of the following limits: 1,404 MMBtu/day or 457,800 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 2520, 9.3.2 and 4320]
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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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, 9.3.2] Federally Enforceable Through Title V Permit
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 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
14. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2, 4305, 4306, and 4320]
15. Emissions from the steam generator shall not exceed any of the following limits: 0.0143 lb-SOx/MMBtu, 0.08 lb-PM10/MMBtu, or 0.08 lb-VOC/MMBtu. [District Rules 2201 and 4320]
16. Except during start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 15 ppmvd NOx @ 3% O2, equivalent to 0.0182 lb-NOx/MMBtu or 50 ppmvd CO @ 3% O2, equivalent to 0.037 lb-CO/MMBtu. [District Rules 2201, 4301, 5.2, 4305, 4306, and 4320]
17. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 50.5 lb-NOx/day, 14,940 lb-NOx/yr, 51.9 lb-CO/day, or 16,939 lb-CO/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of each start-up and shutdown period. [District Rules 2201, 4305, 4306, and 4320]
20. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320]

CONDITIONS CONTINUE ON NEXT PAGE

21. Source testing to measure natural gas-combustion NOx 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]

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. 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]

23. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320]

24. 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]

25. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3Aor ARB Method 100, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - EPA Method 11 or 15, ASTM D3246 or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306 and 4320]

26. 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

27. Operator shall provide an annual fuel analysis to the District. [District Rule 4320]

28. 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 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 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]

30. 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]

31. 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]

CONDITIONS CONTINUE ON NEXT PAGE

32. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320]

33. Copies of all gas purchase contracts, 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, fuel source, 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

34. Permittee shall record daily natural gas and well casing gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit

35. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit

36. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320]

AUTHORITY TO CONSTRUCT

PERMIT NO: C-311-25-6 **ISSUANCE DATE:** 09/22/2009

LEGAL OWNER OR OPERATOR: CHEVRON USA INC
MAILING ADDRESS: PO BOX 1392
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION
FRESNO COUNTY, CA

SECTION: 13 **TOWNSHIP:** 20S **RANGE:** 14E

EQUIPMENT DESCRIPTION:
MODIFICATION OF 58.5 MMBTU/HR SG 13-9 STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE LOW-NOX BURNER AND FLUE GAS RECIRCULATION SYSTEM: LIMIT SULFUR IN FUEL PER 5.4.1.2 FOR RULE 4320 COMPLIANCE

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] Federally Enforceable Through Title V Permit
2. Authority to Construct (ATC) C-311-25-5 shall be implemented prior to or concurrently with this ATC. [District Rule 2201]
3. The permittee shall obtain written District approval for the use of any equivalent equipment not specifically approved by this Authority to Construct. Approval of the equivalent equipment shall be made only after the District's determination that the submitted design and performance of the proposed alternate equipment is equivalent to the specifically authorized equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The permittee's request for approval of equivalent equipment shall include the make, model, manufacturer's maximum rating, manufacturer's guaranteed emission rates, equipment drawing(s), and operational characteristics/parameters. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Alternate equipment shall be of the same class and category of source as the equipment authorized by the Authority to Construct. [District Rule 2201] 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

DAVID WARNER, Director of Permit Services
C-311-25-6 : Nov 6 2012 4:33PM -- RICKARDK : Joint Inspection NOT Required

6. No emission factor and no emission shall be greater for the alternate equipment than for the proposed equipment. No changes in the hours of operation, operating rate, throughput, or firing rate may be authorized for any alternate equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
7. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
8. 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
9. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
10. This unit shall be fueled with natural gas, LPG, or a blend of natural gas and well casing and tank vapor recovery (TVR) gas. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rule 4320]
12. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201]
13. 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 2520, 9.3.2 and 4320]
14. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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, 9.3.2] Federally Enforceable Through Title V Permit
15. 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 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2, 4305, 4306, and 4320]
17. Natural gas consumption shall not exceed either of the following limits: 1,404 million MMBtu/day or 434,700 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
18. LPG consumption shall not exceed either of the following limits: 1,404 MMBtu/day or 435,000 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Emissions from the steam generator shall not exceed any of the following limits: 0.0143 lb-SOx/MMBtu, 0.045 lb-PM10/MMBtu, or 0.009 lb-VOC/MMBtu. [District Rules 2201 and 4320]
20. Except during start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 15 ppmvd NOx @ 3% O2, equivalent to 0.0182 lb-NOx/MMBtu or 50 ppmvd CO @ 3% O2, equivalent to 0.037 lb-CO/MMBtu. [District Rules 2201, 4301, 5.2, 4305, 4306, and 4320]
21. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

22. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 50.5 lb-NOx/day, 15,660 lb-NOx/yr, 51.9 lb-CO/day, or 16,084 lb-CO/yr. [District Rule 2201] Federally Enforceable Through Title V Permit

23. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of each start-up and shutdown period. [District Rules 2201, 4305, 4306, and 4320]

24. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320]

25. Source testing to measure natural gas-combustion NOx 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]

26. 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]

27. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320]

28. 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

29. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3Aor ARB Method 100, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - EPA Method 11 or 15, ASTM D3246 or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306 and 4320]

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, 4306, and 4320]

31. Operator shall provide an annual fuel analysis to the District. [District Rule 4320]

32. 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

33. 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 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]

CONDITIONS CONTINUE ON NEXT PAGE

34. 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]

35. 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]

36. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320]

37. Copies of all gas purchase contracts, 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, fuel source, 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

38. Permittee shall record daily natural gas, propane, and well casing gas consumption. [District Rule 2201] Federally Enforceable Through Title V Permit

39. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit

40. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320]

AUTHORITY TO CONSTRUCT

PERMIT NO: C-311-28-16 **ISSUANCE DATE:** 09/22/2009

LEGAL OWNER OR OPERATOR: CHEVRON USA INC
MAILING ADDRESS: PO BOX 1392
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION
FRESNO COUNTY, CA

SECTION: 13 **TOWNSHIP:** 20S **RANGE:** 14E

EQUIPMENT DESCRIPTION:
MODIFICATION OF 58.5 MMBTU/HR STRUTHERS THERMOFLOOD STEAM GENERATOR #13-12, MODEL OH-50-ND-16XAM, EQUIPPED WITH A NORTH AMERICAN GLE BURNER, FLUE GAS RECIRCULATION (FGR), AND AN OXYGEN CONTROLLER: LIMIT SULFUR IN FUEL PER 5.4.1.2 FOR RULE 4320 COMPLIANCE

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] Federally Enforceable Through Title V Permit
2. This unit shall be fueled with natural gas or a blend of natural gas and well casing and tank vapor recovery (TVR) gas. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rule 4320]
4. Natural gas consumption shall not exceed 1,404 MMBtu/day nor 457,800 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The permittee shall install and maintain a non-resettable, totalizing mass or volumetric flow meter in the fuel line to the boiler. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (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

DAVID WARNER, Director of Permit Services
C-311-28-16 : Nov 6 2012 4:33PM -- RICKARDK : Joint Inspection NOT Required

7. Duration of startup and shutdown shall not exceed two hours each per occurrence and, combined, shall not exceed 4 hours per day. During startup or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of startup and shutdown periods. [District Rule 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
8. Startup is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4305, 4306, and 4320]
9. Nitrogen oxide (NOx) emissions shall not exceed 140 lb/hr, calculated as NO2. [District Rules 4301, 5.2.2, 5.3, and 5.5 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
10. Emissions from this unit shall not exceed any of the following limits: 0.0143 lb-SOx/MMBtu, 0.005 lb-PM10/MMBtu, or 0.008 lb-VOC/MMBtu. [District Rules 2201 and 4320]
11. Except during startup and shutdown, emissions from this unit shall not exceed any of the following limits: 15 ppmvd NOx @ 3% O2 or 0.018 lb-NOx/MMBtu, or 50 ppmvd CO @ 3% O2 or 0.037 lb-CO/MMBtu. [District Rules 2201, 4305, 4306, and 4320]
12. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu nor 0.084 lb-CO/MMBtu. [District Rule 2201]
13. Source testing to measure natural gas-combustion NOx 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 2520, 9.3.2, 4305, 4306, and 4320]
14. Operator shall provide an annual fuel analysis to the District. [District Rule 4320]
15. 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
16. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320]
17. Sampling facilities for source testing shall be provided in accordance with the provisions of rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
18. NOx, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District. [District Rule 2520, 4305, 4306, and 4320]
19. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit
20. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306, and 4320]
21. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320]
22. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

23. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3Aor ARB Method 100, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - EPA Method 11 or 15, ASTM D3246 or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306 and 4320]

24. 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 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]

25. 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]

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, 4306, and 4320]

27. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320]

28. Emissions of sulfur compounds from this unit shall not exceed 200 lb/hr, calculated as SO2. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit

29. 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 2520, 9.3.2 and 4320]

30. 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 ARB Method 1-100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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, 9.3.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

31. 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 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

32. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule Rules 2520, 9.3.2; 4305, 4306, 4320, and 4351, 6.2.1]

33. Stack gas moisture content shall be determined using EPA Method 4. [District Rule 2201] Federally Enforceable Through Title V Permit

34. Copies of all gas purchase contracts, 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, fuel source, and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

35. Permittee shall record daily natural gas consumption. Records shall be made available for District inspection upon request. [District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit

36. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for natural gas used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit

37. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320]

38. 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), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

39. 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), and 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] Federally Enforceable Through Title V Permit

40. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

AUTHORITY TO CONSTRUCT

PERMIT NO: C-311-30-16 **ISSUANCE DATE:** 09/22/2009

LEGAL OWNER OR OPERATOR: CHEVRON USA INC
MAILING ADDRESS: PO BOX 1392
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION
FRESNO COUNTY, CA

SECTION: 13 **TOWNSHIP:** 20S **RANGE:** 14E

EQUIPMENT DESCRIPTION:
MODIFICATION OF 62.5 MMBTU/HR STRUTHERS THERMOFLOOD STEAM GENERATOR #13-14, MODEL OH-50-ND-16XAM, NATURAL GAS FIRED, WITH A NORTH AMERICAN GLE BURNER, AN OXYGEN CONTROLLER, AND A FLUE GAS RECIRCULATION (FGR) SYSTEM: LIMIT SULFUR IN FUEL PER 5.4.1.2 FOR RULE 4320 COMPLIANCE

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] Federally Enforceable Through Title V Permit
2. This unit shall be fired on PUC-quality natural gas, or a blend of PUC-quality natural gas and well casing and tank vapor recovery (TVR) gas. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rule 4320]
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 Rule 2201] Federally Enforceable Through Title V Permit
5. Natural gas consumption shall not exceed 457,800 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The permittee shall install and maintain a non-resettable, totalizing mass or volumetric flow meter in the fuel line to the boiler. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (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

DAVID WARNER, Director of Permit Services
C-311-30-16 : Nov 6 2012 4:33PM – RICKARDK : Joint Inspection NOT Required

8. Duration of startup and shutdown shall not exceed two hours each per occurrence. During startup or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of startup and shutdown periods. [District Rules 2201, 4305, 4306, and 4320]

9. Startup is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4305, 4306, and 4320]

10. Emissions from this unit shall not exceed any of the following limits: 0.0143 lb-SOx/MMBtu, 0.005 lb-PM10/MMBtu, or 0.003 lb-VOC/MMBtu [District Rules 2201 and 4320]

11. Except during startup and shutdown, emissions from this unit shall not exceed any of the following limits: 15 ppmvd NOx @ 3% O2 or 0.018 lb-NOx/MMBtu, or 50 ppmvd CO @ 3% O2 or 0.037 lb-CO/MMBtu. [District Rules 2201, 4305, 4306, and 4320]

12. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu nor 0.084 lb-CO/MMBtu. [District Rule 2201]

13. Nitrogen oxide (NOx) emissions shall not exceed 140 lb/hr, calculated as NO2. [District Rules 4301, 5.2.2, 5.3, and 5.5 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

14. Source testing to measure natural gas-combustion NOx 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 2520, 9.3.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

15. Operator shall provide an annual fuel analysis to the District. [District Rule 4320]

16. 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

17. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320]

18. NOx, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

19. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit

20. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306, and 4320]

21. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320]

22. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

23. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3Aor ARB Method 100, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - EPA Method 11 or 15, ASTM D3246 or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306 and 4320]

24. 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 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]

25. 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]

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, 4306, and 4320]

27. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320]

28. Emissions of sulfur compounds from this unit shall not exceed 200 lb/hr, calculated as SO2. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit

29. 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 2520, 9.3.2 and 4320]

30. 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 ARB Method 1-100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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, 9.3.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

31. 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 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

32. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rules 2520, 9.4.2, 4305, 4306, 4320, and 4351, 6.2.1] Federally Enforceable Through Title V Permit

33. Natural gas sulfur content and higher heating value (hhv) shall be certified by a third party fuel supplier of each fuel source or natural gas shall be tested for sulfur content and higher heating value (hhv) monthly. [District Rule 2201] Federally Enforceable Through Title V Permit

34. Copies of all gas purchase contracts, 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, fuel source, and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

35. Permittee shall maintain accurate annual records of natural gas use, and such records shall be made readily available. [District Rule 1070] Federally Enforceable Through Title V Permit

36. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for natural gas used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit

37. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320]

38. 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), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

39. 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), and 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] Federally Enforceable Through Title V Permit

40. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

AUTHORITY TO CONSTRUCT

PERMIT NO: C-311-36-17 **ISSUANCE DATE:** 09/22/2009

LEGAL OWNER OR OPERATOR: CHEVRON USA INC
MAILING ADDRESS: PO BOX 1392
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION
FRESNO COUNTY, CA

SECTION: 25 **TOWNSHIP:** 20S **RANGE:** 14E

EQUIPMENT DESCRIPTION:
MODIFICATION OF 58.5 MMBTU/HR STRUTHERS THERMOFLOOD MODEL OH-50-ND-16XAM NATURAL GAS/LPG/WELL CASING GAS/TANK VAPOR RECOVERY GAS-FIRED STEAM GENERATOR (SG #25-15) WITH A NORTH AMERICAN MODEL MAGNA-FLAME GLE LOW NOX BURNER SERVED BY THE 25D NEPTUNE AIRPOL CAUSTIC SCRUBBER WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS FROM SECTIONS 25D AND 6C ONLY: LIMIT SOX PER 5.4.1.3 (EXHAUST) FOR RULE 4320 COMPLIANCE (EXISTING SCRUBBER). REMOVE "FROM SECTIONS 25D AND 6C ONLY" FROM EQUIPMENT DESCRIPTION

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] Federally Enforceable Through Title V Permit
2. This unit shall be fueled with natural gas, LPG, or a blend of natural gas and well casing and tank vapor recovery (TVR) gas. [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
6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (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

DAVID WARNER, Director of Permit Services
C-311-36-17 : Nov 6 2012 4:33PM -- RICKARDK : Joint Inspection NOT Required

7. Total LPG, casing gas, waste gas, and natural gas consumption shall not exceed 435,000 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The permittee shall maintain and operate a non-resettable, totalizing mass or volumetric flow meter in the fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Whenever well casing vapors and/or tank vapor recovery gas are being burned in this unit, the SO2 scrubber shall operate and shall reduce SO2 emissions by 95% by weight, or shall limit exhaust SO2 to less than or equal to 9 ppmv corrected to 3.0% oxygen. [District Rules 2201 and 4320]
10. Whenever the unit is switched to scrubbed operation, compliance source testing for SOx shall be conducted within 60 days of initial scrubbing date unless source testing under scrubbed operation has occurred within the previous 12 months. [District Rules 2201 and 4320]
11. PUC quality gas shall be combusted in this unit whenever the scrubber is not being operated. [District Rule 2201]
12. Scrubber liquor pH shall be maintained between 6.5 and 8.0. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Tray packing flowrate shall be operated at 700 to 840 gallons/minute. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Quench flowrate shall be operated at 145 to 185 gallons/minute. [District Rule 2201] Federally Enforceable Through Title V Permit
15. 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel 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
16. 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 ARB Method 1-100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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] Federally Enforceable Through Title V Permit
17. 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 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
18. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.4.2, 4305, 4306, 4320, and 4351, 6.2.1]
19. Except during start-up and shutdown periods, emissions from the steam generator shall not exceed any of the following limits: 15 ppmvd NOx @ 3% O2 or 0.018 lb-NOx/MMBtu, 0.052 lb-SOx/MMBtu, 0.014 lb-PM10/MMBtu, 50 ppmvd CO @ 3% O2 or 0.037 lb-CO/MMBtu, or 0.0085 lb-VOC/MMBtu. [District Rules 2201, 4301, 4305, 4306, and 4320]
20. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. the operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320]

CONDITIONS CONTINUE ON NEXT PAGE

22. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4305, 4306, and 4320]

23. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 50.5 lb-NOx/day, 7,830 lb-NOx/year, 49.1 lb-CO/day, or 16,095 lb-CO/year. [District Rule 2201] Federally Enforceable Through Title V Permit

24. 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 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]

25. 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]

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, 4306, and 4320]

27. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320]

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. 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]

29. Source testing to measure SOx emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. [District Rule 4320]

30. Source testing to measure NOx and CO emissions from this unit while fired on natural gas 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]

31. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320]

32. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

33. 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

34. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3Aor ARB Method 100, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - EPA Method 11 or 15, ASTM D3246 or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306 and 4320]

35. 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]

36. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (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)] Federally Enforceable Through Title V Permit

37. Copies of all gas purchase contracts, 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, fuel source, and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

38. Permittee shall record natural gas, propane, casing gas, and waste gas consumption. [District Rule 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

39. Permittee shall measure and record the BTU content of the gas burned at the time of NOx testing, except for natural gas purchased from a PUC regulated utility. [District Rules 2201 and 4801] Federally Enforceable Through Title V Permit

40. Permittee shall maintain with the permit a current listing of all TEOR and TVR systems providing vapor to this steam generator and shall make such listing readily available for District inspection upon request [District Rule 2201] Federally Enforceable Through Title V Permit

41. Permittee shall maintain daily records of volume of fuel gas burned, TEOR/TVR gas incinerated, and permit number(s) of systems providing gas for incineration. [District Rule 2201] Federally Enforceable Through Title V Permit

42. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320]

43. 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), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

44. 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), and 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] Federally Enforceable Through Title V Permit

45. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

AUTHORITY TO CONSTRUCT

PERMIT NO: C-311-37-21 **ISSUANCE DATE:** 09/22/2009

LEGAL OWNER OR OPERATOR: CHEVRON USA INC
MAILING ADDRESS: PO BOX 1392
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION
FRESNO COUNTY, CA

SECTION: 25 **TOWNSHIP:** 20S **RANGE:** 14E

EQUIPMENT DESCRIPTION:
MODIFICATION OF 62.5 MMBTU/HR STRUTHERS THERMOFLOOD MODEL OH-50-ND-16XAM STEAM GENERATOR (#25-16) WITH A NORTH AMERICAN MODEL GLE LOW NOX BURNER WITH FLUE GAS RECIRCULATION (FGR) SERVED BY THE 25D NEPTUNE AIRPOL CAUSTIC SCRUBBER WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS: LIMIT SOX PER 5.4.1.3 (EXHAUST) FOR RULE 4320 COMPLIANCE (EXISTING SCRUBBER)

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] Federally Enforceable Through Title V Permit
2. This unit shall be fueled with natural gas, LPG, or a blend of natural gas and well casing and tank vapor recovery (TVR) gas. [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
6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (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

DAVID WARNER, Director of Permit Services
C-311-37-21 : Nov 6 2012 4:33PM -- RICKARDK : Joint Inspection NOT Required

7. Total gas consumption shall not exceed 1,404 MMBtu/day nor 457,800 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The permittee shall install and maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the boiler. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Whenever well casing vapors and/or tank vapor recovery gas are being burned in this unit, the SO2 scrubber shall operate and shall reduce SO2 emissions by 95% by weight, or shall limit exhaust SO2 to less than or equal to 9 ppmv corrected to 3.0% oxygen. [District Rules 2201 and 4320]
10. Whenever the unit is switched to scrubbed operation, compliance source testing for SOx shall be conducted within 60 days of initial scrubbing date unless source testing under scrubbed operation has occurred within the previous 12 months. [District Rules 2201 and 4320]
11. PUC quality gas shall be combusted in this unit whenever the scrubber is not being operated. [District Rule 2201]
12. Scrubber liquor pH shall be maintained between 6.5 and 8.0. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Tray packing flowrate shall be operated at 700 to 840 gallons/minute. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Quench flowrate shall be operated at 145 to 185 gallons/minute. [District Rule 2201] Federally Enforceable Through Title V Permit
15. 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel 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
16. 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 ARB Method 1-100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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] Federally Enforceable Through Title V Permit
17. 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 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
18. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.4.2, 4305, 4306, 4320, and 4351, 6.2.1]
19. Except during start-up and shutdown periods, emissions from the steam generator shall not exceed any of the following limits: 15 ppmvd NOx @ 3% O2 or 0.018 lb-NOx/MMBtu, 0.052 lb-SOx/MMBtu, 0.014 lb-PM10/MMBtu, 50 ppmvd CO @ 3% O2 or 0.037 lb-CO/MMBtu, or 0.008 lb-VOC/MMBtu. [District Rules 2201, 4301, 4305, 4306, and 4320]
20. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. the operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320]

CONDITIONS CONTINUE ON NEXT PAGE

22. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4305, 4306, and 4320]

23. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 50.5 lb-NOx/day, 8,240 lb-NOx/year, 85.6 lb-CO/day, or 16,939 lb-CO/year. [District Rule 2201] Federally Enforceable Through Title V Permit

24. 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 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]

25. 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]

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, 4306, and 4320]

27. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320]

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. 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]

29. Source testing to measure SOx emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. [District Rule 4320]

30. Source testing to measure NOx and CO emissions from this unit while fired on natural gas 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]

31. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320]

32. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

33. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3Aor ARB Method 100, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - EPA Method 11 or 15, ASTM D3246 or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306 and 4320]
34. 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
35. 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
36. Sampling facilities for source testing shall be provided in accordance with the provisions of rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
37. Natural gas sulfur content and higher heating value (hhv) shall be certified by a third party fuel supplier of each fuel source or natural gas shall be tested for sulfur content and higher heating value (hhv) monthly. Waste gas shall be tested for sulfur content and higher heating value (hhv) not less than monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
38. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (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)] Federally Enforceable Through Title V Permit
39. Copies of all gas purchase contracts, 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, fuel source, and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
40. Permittee shall record daily total gas consumption. Records shall be retained for at least five years and made available for District inspection upon request. [District Rule 1070 and 2520, 9.5.2] Federally Enforceable Through Title V Permit
41. Daily records of the tray packing flowrate and the quench flowrate shall be maintained, retained on the premises for a period of at least five years, and made available for District inspection upon request. [District Rule 1070 and 2520, 9.5.2] Federally Enforceable Through Title V Permit
42. Permittee shall measure and record the BTU content of the gas burned at the time of NOx source testing, except for natural gas purchased from a PUC regulated utility. [District Rules 2201 and 4801] Federally Enforceable Through Title V Permit
43. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit
44. Permittee shall maintain with the permit a current listing of all TEOR and TVR systems providing vapor to this steam generator and shall make such listing readily available for District inspection upon request [District Rule 2201] Federally Enforceable Through Title V Permit
45. Permittee shall maintain daily records of volume of fuel gas burned, TEOR/TVR gas incinerated, and permit number(s) of systems providing gas for incineration. [District Rule 2201] Federally Enforceable Through Title V Permit
46. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320]
47. 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), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

48. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 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] Federally Enforceable Through Title V Permit

49. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

AUTHORITY TO CONSTRUCT

PERMIT NO: C-311-38-21 **ISSUANCE DATE:** 09/22/2009

LEGAL OWNER OR OPERATOR: CHEVRON USA INC
MAILING ADDRESS: PO BOX 1392
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION
FRESNO COUNTY, CA

SECTION: 25 **TOWNSHIP:** 20S **RANGE:** 14E

EQUIPMENT DESCRIPTION:
MODIFICATION OF 58.5 MMBTU/HR SG 25-17 STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE LOW NOX AND FLUE GAS RECIRCULATION SERVED BY THE 25D NEPTUNE AIRPOL CAUSTIC SCRUBBER WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS: LIMIT SOX PER 5.4.1.3 (EXHAUST) FOR RULE 4320 COMPLIANCE (EXISTING SCRUBBER)

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] Federally Enforceable Through Title V Permit
2. The permittee shall obtain written District approval for the use of any equivalent equipment not specifically approved by this Authority to Construct. Approval of the equivalent equipment shall be made only after the District's determination that the submitted design and performance of the proposed alternate equipment is equivalent to the specifically authorized equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The permittee's request for approval of equivalent equipment shall include the make, model, manufacturer's maximum rating, manufacturer's guaranteed emission rates, equipment drawing(s), and operational characteristics/parameters. [District Rule 2010] Federally Enforceable Through Title V Permit
4. Alternate equipment shall be of the same class and category of source as the equipment authorized by the Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
5. No emission factor and no emission shall be greater for the alternate equipment than for the proposed equipment. No changes in the hours of operation, operating rate, throughput, or firing rate may be authorized for any alternate equipment. [District Rule 2201] 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

DAVID WARNER, Director of Permit Services
C-311-38-21 : Nov 6 2012 4:33PM – RICKARDK : Joint Inspection NOT Required

6. This unit shall be fueled with natural gas, LPG, or a blend of natural gas and well casing and tank vapor recovery (TVR) gas. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Total gas consumption of this unit shall not exceed either of the following limits: 1,404 MMBtu/day or 457,800 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the boiler. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Whenever well casing vapors and/or tank vapor recovery gas are being burned in this unit, the SO2 scrubber shall operate and shall reduce SO2 emissions by 95% by weight, or shall limit exhaust SO2 to less than or equal to 9 ppmv corrected to 3.0% oxygen. [District Rules 2201 and 4320]
10. Whenever the unit is switched to scrubbed operation, compliance source testing for SOx shall be conducted within 60 days of initial scrubbing date unless source testing under scrubbed operation has occurred within the previous 12 months. [District Rules 2201 and 4320]
11. PUC quality gas shall be combusted in this unit whenever the scrubber is not being operated. [District Rule 2201]
12. Scrubber liquor pH shall be maintained between 6.5 and 8.0. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Tray packing flowrate shall be operated at 700 to 840 gallons/minute. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Quench flowrate shall be operated at 145 to 185 gallons/minute. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
16. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [County Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus)] Federally Enforceable Through Title V Permit
17. Emissions of sulfur compounds from this unit shall not exceed 200 lb/hr, calculated as SO2. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.4.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit
18. 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel 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
19. 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 ARB Method 1-100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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] Federally Enforceable Through Title V Permit
20. 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 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

21. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.4.2, 4305, 4306, and 4320, and 4351, 6.2.1] Federally Enforceable Through Title V Permit

22. Nitrogen oxide (NOx) emissions shall not exceed 140 lb/hr, calculated as NO2. [District Rules 4301, 5.2.2, 5.3, and 5.5 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

23. Emissions from the steam generator shall not exceed any of the following limits: 0.052 lb-SOx/MMBtu, 0.045 lb-PM10/MMBtu, or 0.008 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

24. Except during start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 15 ppmvd NOx @ 3% O2, equivalent to 0.0182 lb-NOx/MMBtu or 50 ppmvd CO @ 3% O2, equivalent to 0.037 lb-CO/MMBtu. [District Rules 2201, 4301, 5.2, 4305, 4306, and 4320]

25. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

26. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 4305, 4306, and 4320]

27. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4305, 4306, and 4320]

28. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 50.5 lb-NOx/day, 8,332 lb-NOx/yr, 51.9 lb-CO/day, or 16,939 lb-CO/yr. [District Rule 2201] Federally Enforceable Through Title V Permit

29. Source testing to measure natural gas-combustion NOx 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]

30. Source testing to measure SOx emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. [District Rule 4320]

31. NOx, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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, 4306, and 4320]

33. 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 2520, 9.3.2, 4305, 4306, and 4320]

34. 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]

35. The results of each source test shall be submitted to the District within 60 days after the source test. [District Rule 1081] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

36. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320]

37. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3Aor ARB Method 100, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - EPA Method 11 or 15, ASTM D3246 or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306 and 4320]

38. Stack gas moisture content shall be determined using EPA Method 4. [District Rule 2201] Federally Enforceable Through Title V Permit

39. 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 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 2520, 9.3.2, 4305, 4306, and 4320]

40. 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 2520, 9.3.2, 4305, 4306, and 4320]

41. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 2520, 9.4.2, 4305, 4306, and 4320]

42. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx 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 2520, 9.3.2, 4305, 4306, and 4320]

43. Natural gas sulfur content and higher heating value (hhv) shall be certified by a third party fuel supplier of each fuel source or natural gas shall be tested for sulfur content and higher heating value (hhv) monthly. Waste gas shall be tested for sulfur content and higher heating value (hhv) not less than monthly. [District Rule 2201] Federally Enforceable Through Title V Permit

44. Copies of all gas purchase contracts, 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, fuel source, and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

45. Permittee shall maintain records of daily total gas consumption. [District Rule 1070 and 2520, 9.5.2] Federally Enforceable Through Title V Permit

46. Permittee shall maintain daily records of the tray packing flowrate and the quench flowrate. [District Rule 1070 and 2520, 9.5.2] Federally Enforceable Through Title V Permit

47. Permittee shall measure and record the BTU content of the gas burned at the time of NOx source testing, except for natural gas purchased from a PUC regulated utility. [District Rules 2201 and 4801] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

48. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit

49. Permittee shall maintain with the permit a current listing of all TEOR and TVR systems providing vapor to this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit

50. Permittee shall maintain daily records of volume of fuel gas burned, TEOR/TVR gas incinerated, and permit number(s) of systems providing gas for incineration. [District Rule 2201] Federally Enforceable Through Title V Permit

51. 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, 2520, 9.4.2, 4305, 4306, and 4320]

52. 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), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

53. 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), and 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] Federally Enforceable Through Title V Permit

54. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

AUTHORITY TO CONSTRUCT

PERMIT NO: C-311-39-19 **ISSUANCE DATE:** 09/22/2009

LEGAL OWNER OR OPERATOR: CHEVRON USA INC
MAILING ADDRESS: PO BOX 1392
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION
FRESNO COUNTY, CA

SECTION: 25 **TOWNSHIP:** 20S **RANGE:** 14E

EQUIPMENT DESCRIPTION:
MODIFICATION OF 58.5 MMBTU/HR STRUTHERS THERMOFLOOD STEAM GENERATOR #25-18, MODEL OH-50-ND-16XAM, EQUIPPED WITH A NORTH AMERICAN GLE BURNER AND FLUE GAS RECIRCULATION SERVED BY THE 25D NEPTUNE AIRPOL CAUSTIC SCRUBBER WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS: LIMIT SOX PER 5.4.1.3 (EXHAUST) FOR RULE 4320 COMPLIANCE (EXISTING SCRUBBER)

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] Federally Enforceable Through Title V Permit
2. This unit shall be fueled with natural gas, LPG, or a blend of natural gas and well casing and tank vapor recovery (TVR) gas. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Total gas consumption shall not exceed 1,404 MMBtu/day nor 457,800 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The permittee shall install and maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the boiler. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Whenever well casing vapors and/or tank vapor recovery gas are being burned in this unit, the SO2 scrubber shall operate and shall reduce SO2 emissions by 95% by weight, or shall limit exhaust SO2 to less than or equal to 9 ppmv corrected to 3.0% oxygen. [District Rules 2201 and 4320]
6. Whenever the unit is switched to scrubbed operation, compliance source testing for SOx shall be conducted within 60 days of initial scrubbing date unless source testing under scrubbed operation has occurred within the previous 12 months. [District Rules 2201 and 4320]

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

DAVID WARNER, Director of Permit Services
C-311-39-19 : Nov 6 2012 4:34PM -- RICKARDK : Joint Inspection NOT Required

7. PUC quality gas shall be combusted in this unit whenever the scrubber is not being operated. [District Rule 2201]
8. Scrubber liquor pH shall be maintained between 6.5 and 8.0. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Tray packing flowrate shall be operated at 700 to 840 gallons/minute. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Quench flowrate shall be operated at 145 to 185 gallons/minute. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
12. Nitrogen oxide (NOx) emissions shall not exceed 140 lb/hr, calculated as NO2. [District Rules 4301, 5.2.2, 5.3, and 5.5 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. Emissions from this unit shall not exceed any of the following limits: 0.0520 lb-SOx/MMBtu, 0.045 lb-PM10/MMBtu, or 0.008 lb-VOC/MMBtu. [District Rules 2201 and 4320]
14. Except during startup and shutdown, emissions from this unit shall not exceed any of the following limits: 15 ppmvd NOx @ 3% O2 or 0.018 lb-NOx/MMBtu, or 50 ppmvd CO @ 3% O2 or 0.037 lb-CO/MMBtu. [District Rules 2201, 4305, 4306, and 4320]
15. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu nor 0.084 lb-CO/MMBtu. [District Rule 2201]
16. Duration of startup and shutdown shall not exceed two hours each per occurrence. During startup or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of startup and shutdown periods. [District Rules 2201, 4305, 4306, and 4320]
17. Startup is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320]
18. Source testing to measure SOx emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. [District Rule 4320]
19. Source testing to measure natural gas-combustion NOx 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 2520, 9.3.2, 4305, 4306, and 4320]
20. 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
21. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320]
22. NOx, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District [District Rule 2520, 9.4.2]
23. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit
24. Sampling facilities for source testing shall be provided in accordance with the provisions of rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

25. 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]

26. 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]

27. 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

28. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3Aor ARB Method 100, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - EPA Method 11 or 15, ASTM D3246 or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306 and 4320]

29. 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 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]

30. 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]

31. 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]

32. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320]

33. Emissions of sulfur compounds from this unit shall not exceed 200 lb/hr, calculated as SO2. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

34. 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel 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, 9.3.2] Federally Enforceable Through Title V Permit

35. 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 ARB Method 1-100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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, 9.3.2] Federally Enforceable Through Title V Permit

36. 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 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

37. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rules 2520, 9.3.2, 4305, 4306, 4320, and 4351, 6.2.1]

38. Stack gas moisture content shall be determined using EPA Method 4. [District Rule 2201] Federally Enforceable Through Title V Permit

39. Natural gas sulfur content and higher heating value (hhv) shall be certified by a third party fuel supplier of each fuel source or natural gas shall be tested for sulfur content and higher heating value (hhv) monthly. Waste gas shall be tested for sulfur content and higher heating value (hhv) not less than monthly. [District Rule 2201] Federally Enforceable Through Title V Permit

40. Copies of all gas purchase contracts, 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, fuel source, 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

41. Permittee shall record daily total gas consumption. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

42. Daily records of the tray packing flowrate and the quench flowrate shall be maintained, retained on the premises for a period of at least five years, and made available for District inspection upon request. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

43. Permittee shall measure and record the BTU content of the gas burned at the time of NOx source testing, except for natural gas purchased from a PUC regulated utility. [District Rules 2201 and 4801] Federally Enforceable Through Title V Permit

44. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit

45. Permittee shall maintain with the permit a current listing of all TEOR and TVR systems providing vapor to this steam generator and shall make such listing readily available for District inspection upon request [District Rule 2201] Federally Enforceable Through Title V Permit

46. Permittee shall maintain daily records of volume of fuel gas burned, TEOR/TVR gas incinerated, and permit number(s) of systems providing gas for incineration. [District Rule 2201] Federally Enforceable Through Title V Permit

47. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320]

CONDITIONS CONTINUE ON NEXT PAGE

48. 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), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

49. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 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] Federally Enforceable Through Title V Permit

50. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

AUTHORITY TO CONSTRUCT

PERMIT NO: C-311-40-18 **ISSUANCE DATE:** 09/22/2009

LEGAL OWNER OR OPERATOR: CHEVRON USA INC
MAILING ADDRESS: PO BOX 1392
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION
FRESNO COUNTY, CA

SECTION: 25 **TOWNSHIP:** 20S **RANGE:** 14E

EQUIPMENT DESCRIPTION:
MODIFICATION OF 58.5 MMBTU/HR NATURAL GAS, LPG OR PROCESS GAS FIRED STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE BURNER, FLUE GAS RECIRCULATION SYSTEM, AN OXYGEN CONTROLLER, SERVED BY THE NEPTUNE AIRPOL CAUSTIC SCRUBBER WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS (COMMON TO C-311-37) (SG-25-19): LIMIT SOX PER 5.4.1.3 (EXHAUST) FOR RULE 4320 COMPLIANCE (EXISTING SCRUBBER)

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] Federally Enforceable Through Title V Permit
2. This unit shall be fueled with natural gas, LPG, or a blend of natural gas and well casing and tank vapor recovery (TVR) gas. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Fuel consumption shall not exceed 434,700 MMBtu/year. [District Rule 2201] 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 Rule 2201] Federally Enforceable Through Title V Permit
5. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Whenever well casing vapors and/or tank vapor recovery gas are being burned in this unit, the SO2 scrubber shall operate and shall reduce SO2 emissions by 95% by weight, or shall limit exhaust SO2 to less than or equal to 9 ppmv corrected to 3.0% oxygen. [District Rules 2201 and 4320]

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

DAVID WARNER, Director of Permit Services
C-311-40-18 : Nov 6 2012 4:34PM -- RICKARDK : Joint Inspection NOT Required

7. Whenever the unit is switched to scrubbed operation, compliance source testing for SOx shall be conducted within 60 days of initial scrubbing date unless source testing under scrubbed operation has occurred within the previous 12 months. [District Rules 2201 and 4320]
8. PUC quality gas shall be combusted in this unit whenever the scrubber is not being operated. [District Rule 2201]
9. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
10. Nitrogen oxide (NOx) emissions shall not exceed 140 lb/hr, calculated as NO2. [District Rules 4301, 5.2.2, 5.3, and 5.5 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
11. Emissions from this unit shall not exceed any of the following limits: 0.052 lb-SOx/MMBtu, 0.045 lb-PM10/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201 and 4320]
12. Except during startup and shutdown, emissions from this unit shall not exceed any of the following limits: 15 ppmvd NOx @ 3% O2 or 0.018 lb-NOx/MMBtu, or 50 ppmvd CO @ 3% O2 or 0.037 lb-CO/MMBtu. [District NSR Rule and District Rules 4305, 4306, and 4320]
13. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu nor 0.084 lb-CO/MMBtu. [District Rule 2201]
14. Duration of startup and shutdown shall not exceed two hours each per occurrence. During startup or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of startup and shutdown periods. [District Rules 2201, 4305, 4306, and 4320]
15. Startup is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4305, 4306, and 4320]
16. Source testing to measure SOx emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. [District Rule 4320]
17. Source testing to measure natural gas-combustion NOx 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 2520, 9.3.2, 4305, 4306, and 4320]
18. 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
19. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320]
20. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit
21. 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]
22. 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]
23. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

24. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3Aor ARB Method 100, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - EPA Method 11 or 15, ASTM D3246 or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306 and 4320]

25. 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 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]

26. 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]

27. 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]

28. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320]

29. Emissions of sulfur compounds from this unit shall not exceed 200 lb/hr, calculated as SO2. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit

30. 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit

31. 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 ARB Method 1-100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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 Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

32. 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 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

33. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rules 2520, 9.3.2, 4305, 4306, 4320, and 4351, 6.2.1]

34. Copies of all gas purchase contracts, supplier certifications, and test results (including fuel hhv) 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, fuel source, 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 and District Rule 2201] Federally Enforceable Through Title V Permit

35. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320]

36. 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), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

37. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 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] Federally Enforceable Through Title V Permit

38. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

AUTHORITY TO CONSTRUCT

PERMIT NO: C-311-41-15 **ISSUANCE DATE:** 09/22/2009

LEGAL OWNER OR OPERATOR: CHEVRON USA INC
MAILING ADDRESS: PO BOX 1392
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION
FRESNO COUNTY, CA

SECTION: 25 **TOWNSHIP:** 20S **RANGE:** 14E

EQUIPMENT DESCRIPTION:
MODIFICATION OF 58.5 MMBTU/HR SG 25-20 STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE BURNER AND FLUE GAS RECIRCULATION SYSTEM, SERVED BY THE NEPTUNE AIRPOL CAUSTIC SCRUBBER WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS: LIMIT SOX PER 5.4.1.3 (EXHAUST) FOR RULE 4320 COMPLIANCE (EXISTING SCRUBBER)

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] Federally Enforceable Through Title V Permit
2. Total LPG, casing gas, waste gas, and natural gas consumption shall not exceed 435,000 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Whenever well casing vapors and/or tank vapor recovery gas are being burned in this unit, the SO2 scrubber shall operate and shall reduce SO2 emissions by 95% by weight, or shall limit exhaust SO2 to less than or equal to 9 ppmv corrected to 3.0% oxygen. [District Rules 2201 and 4320]
4. Whenever the unit is switched to scrubbed operation, compliance source testing for SOx shall be conducted within 60 days of initial scrubbing date unless source testing under scrubbed operation has occurred within the previous 12 months. [District Rules 2201 and 4320]
5. PUC quality gas shall be combusted in this unit whenever the scrubber is not being operated. [District Rule 2201]
6. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201]

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

DAVID WARNER, Director of Permit Services
C-311-41-15 : Nov 6 2012 4:34PM -- RICKARDK : Joint Inspection NOT Required

7. 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
8. Nitrogen oxide (NOx) emissions shall not exceed 140 lb/hr, calculated as NO2. [District Rules 4301, 5.2.2, 5.3, and 5.5 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. Emissions from this unit shall not exceed any of the following limits: 0.052 lb-SOx/MMBtu, 0.044 lb-PM10/MMBtu, or 0.0085 lb-VOC/MMBtu. [District Rules 2201 and 4320]
10. Except during startup and shutdown, emissions from this unit shall not exceed any of the following limits: 15 ppmvd NOx @ 3% O2 or 0.018 lb-NOx/MMBtu, or 50 ppmvd CO @ 3% O2 or 0.037 lb-CO/MMBtu. [District NSR Rule and District Rules 4305, 4306, and 4320]
11. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu nor 0.084 lb-CO/MMBtu. [District Rule 2201]
12. Duration of startup and shutdown shall not exceed two hours each per occurrence. During startup or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of startup and shutdown periods. [District Rules 4305, 4306, and 4320]
13. Startup is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 2201, 4305, 4306, and 4320]
14. Source testing to measure SOx emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. [District Rule 4320]
15. Source testing to measure natural gas-combustion NOx 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 2520, 9.3.2, 4305, 4306, and 4320]
16. NOx, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
17. 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
18. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320]
19. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit
20. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306, and 4320]
21. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320]
22. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

23. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3Aor ARB Method 100, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - EPA Method 11 or 15, ASTM D3246 or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306 and 4320]

24. 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 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]

25. 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]

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, 4306, and 4320]

27. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320]

28. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit

29. Emissions of sulfur compounds from this unit shall not exceed 200 lb/hr, calculated as SO2. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit

30. 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

31. 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 ARB Method 1-100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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 Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
32. 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 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
33. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rules 2520, 9.3.2, 4305, 4306, 4320, and 4351, 6.2.1]
34. Copies of all gas purchase contracts, supplier certifications, and test results (including fuel hhv) 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, fuel source, 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 and District Rule 2201] Federally Enforceable Through Title V Permit
35. Permittee shall record natural gas, propane, casing gas and waste gas consumption. [District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
36. Permittee shall measure and record the BTU content of the gas burned at the time of NOx testing, except for natural gas purchased from a PUC regulated utility. [District Rules 2201 and 4801] Federally Enforceable Through Title V Permit
37. Permittee shall maintain with the permit a current listing of all TEOR and TVR systems providing vapor to this steam generator and shall make such listing readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
38. Permittee shall maintain daily records of volume of fuel gas burned, TEOR/TVR gas incinerated, and permit number(s) of systems providing gas for incineration. [District Rule 2201] Federally Enforceable Through Title V Permit
39. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320]
40. 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), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. 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), and 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] Federally Enforceable Through Title V Permit
42. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

AUTHORITY TO CONSTRUCT

PERMIT NO: C-311-76-15 **ISSUANCE DATE:** 01/25/2010

LEGAL OWNER OR OPERATOR: CHEVRON USA INC
MAILING ADDRESS: PO BOX 1392
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION
FRESNO COUNTY, CA

SECTION: 6C **TOWNSHIP:** 20S **RANGE:** 15E

EQUIPMENT DESCRIPTION:
MODIFICATION OF 58.5 MMBTU/HR STRUTHERS THERMOFLOOD (SG 6-38) MODEL OH-50-ND-16XAM NATURAL GAS/LPG/TEOR GAS-FIRED STEAM GENERATOR WITH A NORTH AMERICAN MODEL MAGNA FLAME GLE LOW NOX BURNER AND FLUE GAS RECIRCULATION SYSTEM INCLUDING AN OXYGEN CONTROLLER: LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Authority to Construct (ATC) C-311-76-12 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The permittee shall install and maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the boiler. [District Rule 2201] Federally Enforceable Through Title V Permit
5. 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
6. This unit shall be fired on PUC-quality natural gas, LPG, or a blend of PUC-quality natural gas and well casing and tank vapor recovery (TVR) gas. [District Rule 2201] 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

DAVID WARNER, Director of Permit Services
C-311-76-15 : Nov 6 2012 4:34PM -- RICKARDK : Joint Inspection NOT Required

7. Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rule 4320]
8. Total fuel consumption shall not exceed 1,404 MMBtu/day nor 434,700 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
10. Nitrogen oxide (NOx) emissions shall not exceed 140 lb/hr, calculated as NO2. [District Rules 4301, 5.2.2, 5.3, and 5.5 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
11. Emissions of sulfur compounds from this unit shall not exceed 200 lb/hr, calculated as SO2. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.4.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit
12. Emissions from the steam generator shall not exceed any of the following limits: 0.0143 lb-SOx/MMBtu, 0.00675 lb-PM10/MMBtu, or 0.00855 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
13. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 15 ppmvd NOx @ 3% O2 or 0.018 lb-NOx/MMBtu or 50 ppmvd CO @ 3% O2 or 0.037 lb-CO/MMBtu. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
14. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 50.5 lb-NOx/day, 7,825 lb-NOx/yr, 66.4 lb-CO/day, and 16,084 lb-CO/yr. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
16. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
18. 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 2520, 9.4.2 and 4320] Federally Enforceable Through Title V Permit
19. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

20. 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 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

21. Operator shall provide an annual fuel analysis to the District. [District Rule 4320]

22. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.4.2; 4305, 4306, 4320, and 4351, 6.2.1] Federally Enforceable Through Title V Permit

23. Source testing to measure NOx and CO emissions from this unit while fired on natural gas shall be conducted within 60 days of initial start-up. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

24. Source testing to measure NOx and CO emissions from this unit while fired on natural gas 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

25. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit

26. NOx, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

27. 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

28. The results of each source test shall be submitted to the District within 60 days after completion of the test. [District Rule 1081] Federally Enforceable Through Title V Permit

29. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, Stack Gas Oxygen - EPA Method 3 or 3A or ARB Method 100, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D3246 or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

30. 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 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

31. 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 performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

32. 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

33. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

34. The portable analyzer shall be calibrated as recommended by the manufacturer. All instrument calibration data shall be kept on file including the date of calibration. The calibration date shall not exceed 3 months prior to the date the stack concentrations are measured and recorded. [District Rule 2520, 9.4.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

35. Natural gas or LPG sulfur content and higher heating value (hhv) shall be certified by a third party fuel supplier of each fuel source or natural gas or LPG shall be tested for sulfur content and higher heating value (hhv) monthly. Casing gas shall be tested for sulfur content and higher heating value (hhv) not less than monthly. [District Rule 2201] Federally Enforceable Through Title V Permit

36. 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

37. 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

38. 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

39. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit

40. Copies of all , gas purchase contracts, 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, fuel source, 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

41. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

42. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements of District Rules 1081 (Amended December 16, 1993), 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

43. 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), and 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] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

44. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

AUTHORITY TO CONSTRUCT

PERMIT NO: C-311-84-16 **ISSUANCE DATE:** 01/25/2010

LEGAL OWNER OR OPERATOR: CHEVRON USA INC
MAILING ADDRESS: PO BOX 1392
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION
FRESNO COUNTY, CA

SECTION: 6C **TOWNSHIP:** 20S **RANGE:** 15E

EQUIPMENT DESCRIPTION:
MODIFICATION OF 58.5 MMBTU/HR STRUTHERS THERMOFLOOD (SG 6-37) MODEL OH5O-ND-16XAM NATURAL GAS/LPG/TEOR GAS (COMMON TO C-311-37, SG 25-19) FIRED STEAM GENERATOR WITH A NORTH AMERICAN MODEL MAGNA FLAME GLE LOW NOX BURNER AND FLUE GAS RECIRCULATION: LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. The permittee shall install and maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the boiler. [District Rule 2201] 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 Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall be fired on PUC-quality natural gas, LPG, or a blend of PUC-quality natural gas and well casing and tank vapor recovery (TVR) gas. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rule 4320]

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

DAVID WARNER, Director of Permit Services
C-311-84-16 : Nov 6 2012 4:34PM -- RICKARDK : Joint Inspection NOT Required

7. Total fuel consumption shall not exceed 1,404 MMBtu/day nor 434,700 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit

8. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit

9. Nitrogen oxide (NOx) emissions shall not exceed 140 lb/hr, calculated as NO2. [District Rules 4301, 5.2.2, 5.3, and 5.5 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

10. Emissions of sulfur compounds from this unit shall not exceed 200 lb/hr, calculated as SO2. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.4.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit

11. Emissions from the steam generator shall not exceed any of the following limits: 0.0143 lb-SOx/MMBtu, 0.00675 lb-PM10/MMBtu, or 0.00855 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit

12. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 15 ppmvd NOx @ 3% O2 or 0.018 lb-NOx/MMBtu or 50 ppmvd CO @ 3% O2 or 0.037 lb-CO/MMBtu. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

13. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

14. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 50.5 lb-NOx/day, 7,825 lb-NOx/yr, 66.4 lb-CO/day, and 16,084 lb-CO/yr. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

15. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

16. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

17. 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 2520, 9.4.2 and 4320] Federally Enforceable Through Title V Permit

18. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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] Federally Enforceable Through Title V Permit

19. Operator shall provide an annual fuel analysis to the District. [District Rule 4320]

CONDITIONS CONTINUE ON NEXT PAGE

20. 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 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

21. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

22. Source testing to measure NOx and CO emissions from this unit while fired on natural gas 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

23. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit

24. NOx, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

25. 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

26. The results of each source test shall be submitted to the District within 60 days after completion of the test. [District Rule 1081] Federally Enforceable Through Title V Permit

27. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, Stack Gas Oxygen - EPA Method 3 or 3A or ARB Method 100, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D3246 or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

28. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.4.2; 4305, 4306, 4320, and 4351, 6.2.1] Federally Enforceable Through Title V Permit

29. 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 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

30. 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 performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

31. 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

32. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

33. Natural gas or LPG sulfur content and higher heating value (hhv) shall be certified by a third party fuel supplier of each fuel source; or natural gas or LPG shall be tested for sulfur content and higher heating value (hhv) monthly. Casing gas shall be tested for sulfur content and higher heating value (hhv) not less than monthly. [District Rule 2201] Federally Enforceable Through Title V Permit

34. 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

35. 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

36. 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

37. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit

38. Copies of all , gas purchase contracts, 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, fuel source, 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

39. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

40. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements of District Rules 1081 (Amended December 16, 1993), 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

41. 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), and 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] Federally Enforceable Through Title V Permit

42. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
All Permits	0	0	0	0	0
TOTAL	**0**	**0**	**0**	**0**	**0**

ATTACHMENT D

Application

RECEIVED
JUN 20 2011
SJVAPCD
Southern Region

San Joaquin Valley Air Pollution Control District

www.valleyair.org

Permit Application For:

[ ] ADMINISTRATIVE AMENDMENT [X] MINOR MODIFICATION [ ] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO:
CHEVRON U.S.A. INC.

2. MAILING ADDRESS:

STREET/P.O. BOX: PO BOX 1392

CITY: BAKERSFIELD STATE: CA 9-DIGIT ZIP CODE: 93302

3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:

STREET: Fresno Heavy Oil Source CITY:

____ ¼ SECTION ____ TOWNSHIP ____ RANGE ____

INSTALLATION DATE:

4. GENERAL NATURE OF BUSINESS:
CRUDE OIL AND GAS PRODUCTION

5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE
(include Permit #'s if known, and use additional sheets if necessary)

Implementation of ATCs C-311-20-16, '-21-7, '-25-6, '-28-16, '-30-16, '-36-17, '37-21'-38-21, '39-19, '-40-18, '-41-15
Add sulfur limits for Rule 4320 compliance

6. TYPE OR PRINT NAME OF APPLICANT:
William R. Fall

TITLE OF APPLICANT:
HES Manager

7. SIGNATURE OF APPLICANT: DATE: 6/16/2011

PHONE: (661) 654-7141
FAX: (661) 654-7606
EMAIL: landilr@chevron.com

For APCD Use Only:

DATE STAMP	*FILING FEE RECEIVED :* $ ____ *CHECK#:* ____
	DATE PAID: ____
	PROJECT NO: C-1112109 *FACILITY ID:* C-311

Title V - Minor Mod

RECEIVED
JUN 20 2011
SJVAPCD
Southern Region

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
[X] MINOR PERMIT MODIFICATION
[ ] ADMINISTRATIVE AMENDMENT

COMPANY NAME: **CHEVRON U.S.A. INC.**	FACILITY ID: **C-311**
1. Type of Organization: [X] Corporation [ ] Sole Ownership [ ] Government [ ] Partnership [ ] Utility	
2. Owner's Name: **CHEVRON U.S.A. INC.**	
3. Agent to the Owner: **N/A**	

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

(WF) 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).

(WF) 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.

(WF) Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.

(WF) 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:

William Fall
Signature of Responsible Official

6/16/11
Date

William Fall
Name of Responsible Official (please print)

SJVBU HES Manager
Title of Responsible Official (please print)

ATCs C-311-20-16, '-21-7, '-25-6, '-28-16, '-30-16, '-36-17, '37-21'-38-21, '39-19, '-40-18, '-41-15

San Joaquin Valley Air Pollution Control District

www.valleyair.org

RECEIVED
JUN 20 2011
SJVAPCD
Southern Region

Permit Application For:

[X] ADMINISTRATIVE AMENDMENT [ ] MINOR MODIFICATION [ ] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: CHEVRON U.S.A. INC.

2. MAILING ADDRESS:

STREET/P.O. BOX: PO BOX 1392

CITY: BAKERSFIELD STATE: CA 9-DIGIT ZIP CODE: 93302

3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:

STREET: Fresno Heavy Oil Source CITY:

____ ¼ SECTION ____ TOWNSHIP ____ RANGE ____

INSTALLATION DATE:

4. GENERAL NATURE OF BUSINESS:

CRUDE OIL AND GAS PRODUCTION

5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE
(include Permit #'s if known, and use additional sheets if necessary)

Implementation of ATCs C-311-76-15, '-84-16
Add sulfur limits for Rule 4320 compliance

6. TYPE OR PRINT NAME OF APPLICANT:

William R. Fall

TITLE OF APPLICANT:
HES Manager

7. SIGNATURE OF APPLICANT: DATE: 6/16/2011

PHONE: (661) 654-7141
FAX: (661) 654-7606
EMAIL: landilr@chevron.com

For APCD Use Only:

DATE STAMP	*FILING FEE RECEIVED :* $ ____ *CHECK#:* ____
	DATE PAID: ____
	PROJECT NO: C-1112110 *FACILITY ID:* C-311

Title V - Admin Amend

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
[X] ADMINISTRATIVE AMENDMENT

COMPANY NAME: **CHEVRON U.S.A. INC.**	FACILITY ID: **C-311**
1. Type of Organization: [X] Corporation [ ] Sole Ownership [ ] Government [ ] Partnership [ ] Utility	
2. Owner's Name: **CHEVRON U.S.A. INC.**	
3. Agent to the Owner: **N/A**	

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

(WR) 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).

(WR) 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.

(WR) Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.

(WR) 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:

William Fall
Signature of Responsible Official

6/16/11
Date

William Fall
Name of Responsible Official (please print)

ATCs C-311-76-15, '84-16

SJVBU HES Manager
Title of Responsible Official (please print)

ATTACHMENT E

Previous Title V Operating Permits
(C-311-20-14, '-21-5, '-25-4, '-28-14, '-30-14,
'-36-13, '-37-17, '-38-18, '-39-17, '-40-16,
'-41-13, '-76-10, and '-84-10)

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-311-20-14 **EXPIRATION DATE:** 12/31/2016

SECTION: 13D **TOWNSHIP:** 20S **RANGE:** 14E

EQUIPMENT DESCRIPTION:
58.5 MMBTU/HR NATURAL GAS-FIRED STRUTHERS SG13-04 STEAM GENERATOR WITH A NORTH AMERICAN MODEL 6131G LOW-NOX BURNER WITH OXYGEN CONTROLLER

PERMIT UNIT REQUIREMENTS

1. This unit shall be fired on PUC-quality natural gas, or a blend of PUC-quality natural gas and well casing and tank vapor recovery (TVR) gas. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Total gas consumption of this unit shall not exceed either of the following limits: 1,404 MMBtu/day or 457,800 MMBtu/year. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the boiler. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rules 4201, 3.1, 4301, 5.1 and 5.2.3, and 4320, 5.4] Federally Enforceable Through Title V Permit
5. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [District Rule 4801] Federally Enforceable Through Title V Permit
6. Emissions of sulfur compounds from this unit shall not exceed 200 lb/hr, calculated as SO2. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit
7. 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel 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, 9.3.2] Federally Enforceable Through Title V Permit
8. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

9. 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 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2; and 4305, 6.2.1] Federally Enforceable Through Title V Permit
11. Nitrogen oxide (NOx) emissions shall not exceed 140 lb/hr, calculated as NO2. [District Rules 4301, 5.2.2, 5.3, and 5.5 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Emissions from the steam generator shall not exceed any of the following limits: 0.157 lb-SOx/MMBtu, 0.004 lb-PM10/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Except during start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 15 ppmvd NOx @ 3% O2, equivalent to 0.0182 lb-NOx/MMBtu or 50 ppmvd CO @ 3% O2, equivalent to 0.037 lb-CO/MMBtu. [District Rules 2201, 4301, 5.2, 4305, 5.1, and 4306, 5.1] Federally Enforceable Through Title V Permit
14. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 4305, 5.5.6 and 4306, 5.3] Federally Enforceable Through Title V Permit
16. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.25 and 3.22] Federally Enforceable Through Title V Permit
17. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 50.5 lb-NOx/day, 8,332 lb-NOx/yr, 51.9 lb-CO/day, or 16,939 lb-CO/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The emission factor (EF) for SOx shall be determined and recorded on a monthly basis by using the following formula: EF = (A + B) x 2.857 / Total, where: A = (the amount (in MMscf) of well casing gas consumed for the month X the sulfur content (in grain/100 scf) as posted in the most recent lab analysis); B = (the amount (in MMscf) of PUC grade natural gas consumed for the month X 0.21; and Total = (the total amount of well casing and PUC grade gas combined consumed (in MMscf) for the month). [District NSR Rule] Federally Enforceable Through Title V Permit
19. NOx 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 2520, 9.3.2, 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
20. CO emissions for source test purposes shall be determined using EPA Method 10, 10B, or ARB Method 100. [District Rule 2520, 9.3.2 and 4305] Federally Enforceable Through Title V Permit
21. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 2520, 9.3.2, 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
22. Source testing to measure natural gas-combustion NOx 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, 6.3.1, and 4306, 6.3.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

23. NOx, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

24. 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 2520, 9.3.2, 4305, 5.5.5 and 4306, 5.5.5] Federally Enforceable Through Title V Permit

25. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit

26. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. The source test plan shall indicate which test method shall be used to demonstrate compliance. [District Rule 1081] Federally Enforceable Through Title V Permit

27. The results of each source test shall be submitted to the District within 60 days after the source test. [District Rule 1081] Federally Enforceable Through Title V Permit

28. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5.1 and 4306, 5.5.1] Federally Enforceable Through Title V Permit

29. 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 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 2520, 9.3.2, 4305 and 4306] Federally Enforceable Through Title V Permit

30. 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 2520, 9.3.2, 4305 and 4306] Federally Enforceable Through Title V Permit

31. 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 2520, 9.3.2, 4305 and 4306] Federally Enforceable Through Title V Permit

32. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx 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 2520, 9.3.2, 4305 and 4306] Federally Enforceable Through Title V Permit

33. Concentration measurements shall not be taken until the sample acquisition probe has been exposed to the stack gas for at least 150% of the response time. Measurements shall be taken in triplicate. [District Rule 2520, 9.3.2 and 4305] Federally Enforceable Through Title V Permit

34. If water vapor is not removed prior to measurement, the absolute humidity in the gas stream must be determined so that the gas concentrations may be reported on a dry basis. [District Rule 2520, 9.3.2 and 4305] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

35. If water vapor creates an interference with the measurement of any component, then the water vapor must be removed from the gas stream prior to concentration measurements. [District Rule 2520, 9.3.2 and 4305] Federally Enforceable Through Title V Permit

36. When calculating NOx or CO emission limits based on heat input (lb/MMBtu), fuel hhv shall be certified by third party supplier or determined by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588. [District Rule 2520, 9.3.2 and 4305] Federally Enforceable Through Title V Permit

37. The well casing gas shall be sampled monthly from the gas line down stream from the point where the casing gas from all 4 casing collection systems is connected together and upstream from the point where the well casing gas is fed to the steam generators. The gas sample shall be analyzed by the laboratory for total sulfur and the results shall be given in grain/100 scf. [District NSR Rule] Federally Enforceable Through Title V Permit

38. Permittee shall maintain monthly records of the total amount of well casing gas consumed by the entire bank of steam generators (in MMscf), along with the date and time of the measurement. [District Rule 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit

39. Permittee shall maintain monthly records of the total amount of PUC grade gas consumed by the entire bank of steam generators (in MMscf), along with the date and time of the measurement. [District Rule 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit

40. Permittee shall maintain records of daily total gas consumption. [District Rule 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit

41. Permittee shall maintain records of all lab analyses. [District Rule 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit

42. Natural gas sulfur content and higher heating value (hhv) shall be certified by a third party fuel supplier of each fuel source or natural gas shall be tested for sulfur content and higher heating value (hhv) monthly. Casing gas shall be tested for sulfur content and higher heating value (hhv) not less than monthly. [District NSR Rule] Federally Enforceable Through Title V Permit

43. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District NSR Rule] Federally Enforceable Through Title V Permit

44. Copies of all gas purchase contracts, 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, fuel source, 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

45. 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, 2520, 9.4.2, 4305, 6.1, and 4306, 6.1] Federally Enforceable Through Title V Permit

46. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320, 5.3] Federally Enforceable Through Title V Permit

47. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 1081 (Amended December 16, 1993), 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

48. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-311-21-5 **EXPIRATION DATE:** 12/31/2016

SECTION: 13 **TOWNSHIP:** 20S **RANGE:** 14

EQUIPMENT DESCRIPTION:
58.5 MBTU/HR SG 13-5 STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE LOW-NOX BURNER

PERMIT UNIT REQUIREMENTS

1. 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
2. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
3. This unit shall only be fired natural gas and/or well casing gas. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Total gas consumption shall not exceed either of the following limits: 1,404 MMBtu/day or 457,800 MMBtu/year. [District NSR Rule] Federally Enforceable Through Title V Permit
5. 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel 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, 9.3.2] Federally Enforceable Through Title V Permit
6. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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, 9.3.2] Federally Enforceable Through Title V Permit
7. 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 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2; and 4305, 6.2.1] Federally Enforceable Through Title V Permit
9. Emissions from the steam generator shall not exceed any of the following limits: 0.157 lb-SOx/MMBtu, 0.08 lb-PM10/MMBtu, or 0.08 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

10. Except during start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 15 ppmvd NOx @ 3% O2, equivalent to 0.0182 lb-NOx/MMBtu or 50 ppmvd CO @ 3% O2, equivalent to 0.037 lb-CO/MMBtu. [District Rules 2201, 4301, 5.2, 4305, 5.1, and 4306, 5.1] Federally Enforceable Through Title V Permit
11. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 50.5 lb-NOx/day, 14,940 lb-NOx/yr, 51.9 lb-CO/day, or 16,939 lb-CO/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of each start-up and shutdown period. [District Rules 4305, 5.5.6 and 4306, 5.3] Federally Enforceable Through Title V Permit
14. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.25 and 3.22] Federally Enforceable Through Title V Permit
15. Source testing to measure natural gas-combustion NOx 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 and 4306] Federally Enforceable Through Title V Permit
16. 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] Federally Enforceable Through Title V Permit
17. 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
18. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
19. NOx 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 and 4306] Federally Enforceable Through Title V Permit
20. CO emissions for source test purposes shall be determined using EPA Method 10, 10B, or ARB Method 100. [District Rule 2520, 9.3.2 and 4305] Federally Enforceable Through Title V Permit
21. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
22. 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
23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

24. 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 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

25. 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 and 4306] 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 NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx 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. Copies of all gas purchase contracts, 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, fuel source, 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

29. Permittee shall record daily natural gas and well casing gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit

30. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District NSR Rule] Federally Enforceable Through Title V Permit

31. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 6.1, and 4306, 6.1] Federally Enforceable Through Title V Permit

32. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit

33. On and after July 1, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contacts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

34. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such 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 and Rule 4320] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-311-25-4 **EXPIRATION DATE:** 12/31/2016

SECTION: 13 **TOWNSHIP:** 20S **RANGE:** 14E

EQUIPMENT DESCRIPTION:
58.5 MMBTU/HR SG 13-9 STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN FLUE GAS RECIRCULATION SYSTEM.

PERMIT UNIT REQUIREMENTS

1. 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
2. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
3. This unit shall be fueled with natural gas, LPG, or a blend of natural gas and well casing and tank vapor recovery (TVR) gas. [District Rule 2201] Federally Enforceable Through Title V Permit
4. 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel 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, 9.3.2] Federally Enforceable Through Title V Permit
5. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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, 9.3.2] Federally Enforceable Through Title V Permit
6. 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 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
7. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2; and 4305, 6.2.1] Federally Enforceable Through Title V Permit
8. Natural gas consumption shall not exceed either of the following limits: 1,404 million MMBtu/day or 434,700 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
9. LPG consumption shall not exceed either of the following limits: 1,404 MMBtu/day or 435,000 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

10. Emissions from the steam generator shall not exceed any of the following limits: 0.052 lb-SOx/MMBtu, 0.045 lb-PM10/MMBtu, or 0.009 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Except during start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 15 ppmvd NOx @ 3% O2, equivalent to 0.0182 lb-NOx/MMBtu or 50 ppmvd CO @ 3% O2, equivalent to 0.037 lb-CO/MMBtu. [District Rules 2201, 4301, 5.2, 4305, 5.1, and 4306, 5.1] Federally Enforceable Through Title V Permit
12. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2202] Federally Enforceable Through Title V Permit
13. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 50.5 lb-NOx/day, 15,660 lb-NOx/yr, 51.9 lb-CO/day, or 16,084 lb-CO/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of each start-up and shutdown period. [District Rules 4305, 5.5.6 and 4306, 5.3] Federally Enforceable Through Title V Permit
15. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.25 and 3.22] Federally Enforceable Through Title V Permit
16. Source testing to measure natural gas-combustion NOx 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 and 4306] 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 and 4306] Federally Enforceable Through Title V Permit
18. 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
19. 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
20. NOx 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 and 4306] Federally Enforceable Through Title V Permit
21. CO emissions for source test purposes shall be determined using EPA Method 10, 10B, or ARB Method 100. [District Rule 2520, 9.3.2 and 4305] Federally Enforceable Through Title V Permit
22. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
23. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

24. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit

25. The 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 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

26. 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 and 4306] Federally Enforceable Through Title V Permit

27. 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

28. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx 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

29. Copies of all gas purchase contracts, 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, fuel source, 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

30. Permittee shall record daily natural gas, propane, and well casing gas consumption. [District NSR Rule] Federally Enforceable Through Title V Permit

31. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District NSR Rule] Federally Enforceable Through Title V Permit

32. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 6.1, and 4306, 6.1] Federally Enforceable Through Title V Permit

33. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit

34. On and after July 1, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contacts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

35. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such 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 and Rule 4320] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-311-28-14 **EXPIRATION DATE:** 12/31/2016

SECTION: 13 **TOWNSHIP:** 20S **RANGE:** 14E

EQUIPMENT DESCRIPTION:
58.5 MMBTU/HR STRUTHERS THERMOFLOOD STEAM GENERATOR #13-12, MODEL OH-50-ND-16XAM, EQUIPPED WITH A NORTH AMERICAN GAS AND OIL BURNER, MODEL 6131G-CR-62.5, FLUE GAS RECIRCULATION (FGR), AND AN OXYGEN CONTROLLER.

PERMIT UNIT REQUIREMENTS

1. This unit shall be fueled with natural gas or a blend of natural gas and well casing and tank vapor recovery (TVR) gas. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Natural gas consumption shall not exceed 1,404 MMBtu/day nor 457,800 MMBtu/year. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The permittee shall install and maintain a non-resettable, totalizing mass or volumetric flow meter in the fuel line to the boiler. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
5. Duration of startup and shutdown shall not exceed two hours each per occurrence and, combined, shall not exceed 4 hours per day. During startup or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of startup and shutdown periods. [District Rule 4306, 5.3.1] Federally Enforceable Through Title V Permit
6. Startup is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.25 and 3.22] Federally Enforceable Through Title V Permit
7. Nitrogen oxide (NOx) emissions shall not exceed 140 lb/hr, calculated as NO2. [District Rules 4301, 5.2.2, 5.3, and 2520, 9.4.2] Federally Enforceable Through Title V Permit
8. Emissions from this unit shall not exceed any of the following limits: 0.284 lb-SOx/MMBtu, 0.005 lb-PM10/MMBtu, or 0.008 lb-VOC/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Except during startup and shutdown, emissions from this unit shall not exceed any of the following limits: 15 ppmvd NOx @ 3% O2 or 0.018 lb-NOx/MMBtu, or 50 ppmvd CO @ 3% O2 or 0.037 lb-CO/MMBtu. [District NSR Rule and District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
10. During startup and shutdown, emission rates from the unit shall not exceed any of the following limits: 5.85 lb-NOx/hr, 16.61 lb-SOx/hr, 0.29 lb-PM10/hr, 4.91 lb-CO/hr, or 0.47 lb-VOC/hr. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

11. Source testing to measure natural gas-combustion NOx 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 Rules4305, 6.3.1 and 4306, 6.3.1] Federally Enforceable Through Title V Permit
12. 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
13. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5.1 and 4306, 5.5.1] Federally Enforceable Through Title V Permit
14. Sampling facilities for source testing shall be provided in accordance with the provisions of rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
15. NOx, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). [District Rule 1081] 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, 5.2.2 and 4306, 5.5.2] 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, 5.5.5 and 4306, 5.5.5] Federally Enforceable Through Title V Permit
19. 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
20. NOx 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, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
21. CO emissions for source test purposes shall be determined using EPA Method 10, 10B, or ARB Method 100. [District Rule 2520, 9.3.2 and 4305] Federally Enforceable Through Title V Permit
22. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
23. 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 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, 5.4.2 and 4306, 5.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

24. 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, 5.4.2 and 4306, 5.4.2] Federally Enforceable Through Title V Permit

25. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.4.2 and 4306, 5.4.2 and 5.5.4] Federally Enforceable Through Title V Permit

26. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx 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, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit

27. Emissions of sulfur compounds from this unit shall not exceed 200 lb/hr, calculated as SO2. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit

28. 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel 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, 9.3.2] Federally Enforceable Through Title V Permit

29. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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, 9.3.2] Federally Enforceable Through Title V Permit

30. 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 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

31. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule Rules 2520, 9.3.2; 4305, 6.2.1; 4306, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

32. Stack gas moisture content shall be determined using EPA Method 4. [District NSR Rule] Federally Enforceable Through Title V Permit

33. Annual test results to the District from unit(s) representing a group of units may be used to measure NOx emissions of this permit for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NOx emission limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. [District Rules 2520, 9.3.2, 4306, 6.3.2, and 4305, 6.3.2] Federally Enforceable Through Title V Permit

34. The following conditions must be met for representative unit(s) to be used to test for NOx limits for a group of units: 1) all units are initially source tested and emissions from each unit in group are less than 90% of the permitted value and vary 25% or less from the average of all runs, 2) all units in group are similar in terms of rated heat input (rating not to exceed 100 MMBtu/hr), make and series, operation conditions, and control method, and 3) the group is owned by a single owner and located at a single stationary source. [District Rules 2520, 9.3.2, 4306, 6.3.2, and 4305, 6.3.2] Federally Enforceable Through Title V Permit

35. All units in a group for which representative units are source for NOx emissions shall have received the same maintenance and tune-up procedures as the representative unit(s). Records shall be maintained for the each unit of the group including all preventative and corrective maintenance work done. [District Rules 2520, 9.3.2, 4306, 6.3.2, and 4305, 6.3.2] Federally Enforceable Through Title V Permit

36. All units in a group for which representative units are source tested for NOx emissions for this permit shall be fired on the same fuel type during the entire compliance period. If a unit switches for any time to an alternate fuel type (e.g. from natural gas to oil) then that unit shall not be considered part of the group and shall be required to undergo a source test for all fuel types used, within one year of the switch. [District Rules 2520, 9.3.2, 4306, 6.3.2, and 4305, 6.3.2] Federally Enforceable Through Title V Permit

37. The number of representative units source tested for NOx emissions shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that in 3 years, all units in the entire group will have been tested at least once. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

38. Copies of all gas purchase contracts, 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, fuel source, and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

39. Permittee shall record daily natural gas consumption. Records shall be made available for District inspection upon request. [District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit

40. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for natural gas used in this operation. [District NSR Rule] Federally Enforceable Through Title V Permit

41. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit

42. 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), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

43. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

44. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

45. On and after July 1, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contacts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

46. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such 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 and Rule 4320] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-311-30-14 **EXPIRATION DATE:** 12/31/2016

SECTION: 13 **TOWNSHIP:** 20S **RANGE:** 14E

EQUIPMENT DESCRIPTION:
62.5 MMBTU/HR STRUTHERS THERMOFLOOD STEAM GENERATOR #13-14, MODEL OH-50-ND-16XAM, NATURAL GAS FIRED, WITH A NORTH AMERICAN BURNER, MODEL 613G-CR-62.5, AN OXYGEN CONTROLLER, AND A FLUE GAS RECIRCULATION (FGR) SYSTEM.

PERMIT UNIT REQUIREMENTS

1. This unit shall be fueled with natural gas or a blend of natural gas and well casing and tank vapor recovery (TVR) gas. [District NSR Rule] Federally Enforceable Through Title V Permit
2. 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
3. Natural gas consumption shall not exceed 457,800 MMBtu/year. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The permittee shall install and maintain a non-resettable, totalizing mass or volumetric flow meter in the fuel line to the boiler. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
6. Duration of startup and shutdown shall not exceed two hours each per occurrence and, combined, shall not exceed 4 hours per day. During startup or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of startup and shutdown periods. [District Rule 4306, 5.3.1] Federally Enforceable Through Title V Permit
7. Startup is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.25 and 3.22] Federally Enforceable Through Title V Permit
8. Emissions from this unit shall not exceed any of the following limits: 0.14 lb-SOx/MMBtu, 0.005 lb-PM10/MMBtu, or 0.003 lb-VOC/MMBtu [District NSR Rule] Federally Enforceable Through Title V Permit
9. Except during startup and shutdown, emissions from this unit shall not exceed any of the following limits: 15 ppmvd NOx @ 3% O2 or 0.018 lb-NOx/MMBtu, or 50 ppmvd CO @ 3% O2 or 0.37 lb-CO/MMBtu. [District NSR Rule and District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
10. During startup and shutdown, emission rates from the unit shall not exceed any of the following limits: 6.25 lb-NOx/hr, 8.75 lb-SOx/hr, 0.31 lb-PM10/hr, 5.25 lb-CO/hr, or 0.19 lb-VOC/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Nitrogen oxide (NOx) emissions shall not exceed 140 lb/hr, calculated as NO2. [District Rules 4301, 5.2.2 and 5.3, and 2520, 9.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

12. Source testing to measure natural gas-combustion NOx 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, 6.3.1 and 4306, 6.3.1] Federally Enforceable Through Title V Permit
13. 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
14. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5.1and 4306, 5.5.1] Federally Enforceable Through Title V Permit
15. NOx, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). [District Rule 1081] 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, 5.5.2 and 4306, 5.5.2] 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, 5.5.5 and 4306, 5.5.5] Federally Enforceable Through Title V Permit
19. 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
20. NOx 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, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
21. CO emissions for source test purposes shall be determined using EPA Method 10, 10B, or ARB Method 100. [District Rule 2520, 9.3.2 and 4305] Federally Enforceable Through Title V Permit
22. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
23. 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 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, 5.4.2 and 4306, 5.4.2] Federally Enforceable Through Title V Permit
24. 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, 5.4.2 and 4306, 5.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

25. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.4.2 and 4306, 5.5.2 and 5.5.4] Federally Enforceable Through Title V Permit

26. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx 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, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit

27. Emissions of sulfur compounds from this unit shall not exceed 200 lb/hr, calculated as SO2. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit

28. 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel 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, 9.3.2] Federally Enforceable Through Title V Permit

29. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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, 9.3.2] Federally Enforceable Through Title V Permit

30. 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 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

31. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rules 2520, 9.4.2; 4305, 6.2.1; 4306, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit

32. Natural gas sulfur content and higher heating value (hhv) shall be certified by a third party fuel supplier of each fuel source or natural gas shall be tested for sulfur content and higher heating value (hhv) monthly. [District NSR Rule] Federally Enforceable Through Title V Permit

33. Copies of all gas purchase contracts, 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, fuel source, and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

34. Permittee shall maintain accurate annual records of natural gas use, and such records shall be made readily available. [District Rule 1070] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

35. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for natural gas used in this operation. [District NSR Rule] Federally Enforceable Through Title V Permit

36. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit

37. 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), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

38. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

39. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit

40. On and after July 1, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contacts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

41. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such 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 and Rule 4320] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-311-36-13 **EXPIRATION DATE:** 12/31/2016

SECTION: 25 **TOWNSHIP:** 20S **RANGE:** 14E

EQUIPMENT DESCRIPTION:
58.5 MMBTU/HR STRUTHERS THERMOFLOOD MODEL OH-50-ND-16XAM NATURAL GAS/LPG/WELL CASING GAS/TANK VAPOR RECOVERY GAS-FIRED STEAM GENERATOR (SG #25-15) WITH A NORTH AMERICAN MODEL MAGNA-FLAME GLE LOW NOX BURNER SERVED BY THE 25D NEPTUNE AIRPOL CAUSTIC SCRUBBER WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS FROM SECTIONS 25D AND 6C ONLY

PERMIT UNIT REQUIREMENTS

1. This unit shall be fueled with natural gas, LPG, or a blend of natural gas and well casing and tank vapor recovery (TVR) gas. [District NSR Rule] Federally Enforceable Through Title V Permit
2. 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
3. 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
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. Total LPG, casing gas, waste gas, and natural gas consumption shall not exceed 435,000 MMBtu/year. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The permittee shall maintain and operate a non-resettable, totalizing mass or volumetric flow meter in the fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The caustic scrubber shall be operated to control SOx emissions when ever the steam generator is fueled with well casing and/or TVR gas. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Scrubber liquor pH shall be maintained between 6.5 and 8.0. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Tray packing flowrate shall be operated at 700 to 840 gallons/minute. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Quench flowrate shall be operated at 145 to 185 gallons/minute. [District NSR Rule] Federally Enforceable Through Title V Permit
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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel 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] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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, 9.3.2] Federally Enforceable Through Title V Permit
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 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
14. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rules 2520, 4305, and 4351] Federally Enforceable Through Title V Permit
15. Except during start-up and shutdown periods, emissions from the steam generator shall not exceed any of the following limits: 15 ppmvd NOx @ 3% O2 or 0.018 lb-NOx/MMBtu, 0.052 lb-SOx/MMBtu, 0.014 lb-PM10/MMBtu, 50 ppmvd CO @ 3% O2 or 0.037 lb-CO/MMBtu, or 0.0085 lb-VOC/MMBtu. [District Rules 2201, 4301, 4305, and 4306] Federally Enforceable Through Title V Permit
16. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. the operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306] Federally Enforceable Through Title V Permit
19. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 50.5 lb-NOx/day, 7,830 lb-NOx/year, 49.1 lb-CO/day, or 16,095 lb-CO/year. [District Rule 2201] Federally Enforceable Through Title V Permit
20. 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 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
21. 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 and 4306] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

22. 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
23. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx 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
24. 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] Federally Enforceable Through Title V Permit
25. Source testing to measure NOx and CO emissions from this unit while fired on natural gas 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 and 4306] Federally Enforceable Through Title V Permit
26. 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
27. 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
28. 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. NOx 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 and 4306] Federally Enforceable Through Title V Permit
30. CO emissions for source test purposes shall be determined using EPA Method 10, 10B, or ARB Method 100. [District Rule 2520, 9.3.2 and 4305] Federally Enforceable Through Title V Permit
31. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
32. 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
33. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (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)] Federally Enforceable Through Title V Permit
34. Copies of all gas purchase contracts, 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, fuel source, and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
35. Permittee shall record natural gas, propane, casing gas, and waste gas consumption. [District Rule 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

36. Permittee shall measure and record the BTU content of the gas burned at the time of NOx testing, except for natural gas purchased from a PUC regulated utility. [District NSR Rule and 4801] Federally Enforceable Through Title V Permit

37. Permittee shall maintain with the permit a current listing of all TEOR and TVR systems providing vapor to this steam generator and shall make such listing readily available for District inspection upon request [District NSR Rule] Federally Enforceable Through Title V Permit

38. Permittee shall maintain daily records of volume of fuel gas burned, TEOR/TVR gas incinerated, and permit number(s) of systems providing gas for incineration. [District NSR Rule] Federally Enforceable Through Title V Permit

39. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit

40. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit

41. On and after July 1, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contacts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

42. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such 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 and Rule 4320] Federally Enforceable Through Title V Permit

43. 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), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit

44. 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), and 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] Federally Enforceable Through Title V Permit

45. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-311-37-17 **EXPIRATION DATE:** 12/31/2016

SECTION: 25 **TOWNSHIP:** 20S **RANGE:** 14E

EQUIPMENT DESCRIPTION:
62.5 MMBTU/HR STRUTHERS THERMOFLOOD MODEL OH-50-ND-16XAM STEAM GENERATOR (#25-16) WITH A NORTH AMERICAN MODEL GLE LOW NOX BURNER WITH FLUE GAS RECIRCULATION (FGR) SERVED BY THE 25D NEPTUNE AIRPOL CAUSTIC SCRUBBER WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS

PERMIT UNIT REQUIREMENTS

1. This unit shall be fueled with natural gas, LPG, or a blend of natural gas and well casing and tank vapor recovery (TVR) gas. [District NSR Rule] Federally Enforceable Through Title V Permit
2. 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
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rules 4201, 3.1 and 4301, 5.1and 5.2] Federally Enforceable Through Title V Permit
4. Total gas consumption shall not exceed 1,404 MMBtu/day nor 457,800 MMBtu/year. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The permittee shall install and maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the boiler. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The caustic scrubber shall be operated to control SOx emissions when ever the steam generator is fueled with well casing and/or TVR gas. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Scrubber liquor pH shall be maintained between 6.5 and 8.0. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Tray packing flowrate shall be operated at 700 to 840 gallons/minute. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Quench flowrate shall be operated at 145 to 185 gallons/minute. [District NSR Rule] Federally Enforceable Through Title V Permit
10. 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel 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, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

11. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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, 9.3.2] Federally Enforceable Through Title V Permit

12. 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 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

13. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2; 4305, 6.2.1, 4306, 6.2.1, and 4351, 6.2.1] Federally Enforceable Through Title V Permit

14. Except during start-up and shutdown periods, emissions from the steam generator shall not exceed any of the following limits: 15 ppmvd NOx @ 3% O2 or 0.018 lb-NOx/MMBtu, 0.052 lb-SOx/MMBtu, 0.014 lb-PM10/MMBtu, 50 ppmvd CO @ 3% O2 or 0.037 lb-CO/MMBtu, or 0.008 lb-VOC/MMBtu. [District Rules 2201, 4301, 4305, and 4306] Federally Enforceable Through Title V Permit

15. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

16. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. the operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rule 2201] Federally Enforceable Through Title V Permit

17. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.25 and 3.22] Federally Enforceable Through Title V Permit

18. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 50.5 lb-NOx/day, 8,240 lb-NOx/year, 85.6 lb-CO/day, or 16,939 lb-CO/year. [District Rule 2201] Federally Enforceable Through Title V Permit

19. 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 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, 5.4.2 and 4306, 5.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

20. 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, 5.4.2 and 4306, 5.4.2] Federally Enforceable Through Title V Permit

21. 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, 5.4.2 and 4306, 5.4.2] Federally Enforceable Through Title V Permit

22. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx 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, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit

23. 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, 5.5.2 and 4306, 5.5.2] Federally Enforceable Through Title V Permit

24. Source testing to measure NOx and CO emissions from this unit while fired on natural gas 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, 6.3.1 and 4306, 6.3.1] Federally Enforceable Through Title V Permit

25. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5.1 and 4306, 5.5.1] Federally Enforceable Through Title V Permit

26. 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

27. NOx 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, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit

28. CO emissions for source test purposes shall be determined using EPA Method 10, 10B, or ARB Method 100. [District Rule 2520, 9.3.2 and 4305] Federally Enforceable Through Title V Permit

29. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit

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, 5.5.5 and 4306, 5.5.5] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

31. 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
32. Sampling facilities for source testing shall be provided in accordance with the provisions of rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
33. Natural gas sulfur content and higher heating value (hhv) shall be certified by a third party fuel supplier of each fuel source or natural gas shall be tested for sulfur content and higher heating value (hhv) monthly. Waste gas shall be tested for sulfur content and higher heating value (hhv) not less than monthly. [District NSR Rule] Federally Enforceable Through Title V Permit
34. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit
35. Copies of all gas purchase contracts, 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, fuel source, and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
36. Permittee shall record daily total gas consumption. Records shall be retained for at least five years and made available for District inspection upon request. [District Rule 1070 and 2520, 9.5.2] Federally Enforceable Through Title V Permit
37. Daily records of the tray packing flowrate and the quench flowrate shall be maintained, retained on the premises for a period of at least five years, and made available for District inspection upon request. [District Rule 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
38. Permittee shall measure and record the BTU content of the gas burned at the time of NOx source testing, except for natural gas purchased from a PUC regulated utility. [District NSR Rule and 4801] Federally Enforceable Through Title V Permit
39. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District NSR Rule] Federally Enforceable Through Title V Permit
40. Permittee shall maintain with the permit a current listing of all TEOR and TVR systems providing vapor to this steam generator and shall make such listing readily available for District inspection upon request [District NSR Rule] Federally Enforceable Through Title V Permit
41. Permittee shall maintain daily records of volume of fuel gas burned, TEOR/TVR gas incinerated, and permit number(s) of systems providing gas for incineration. [District NSR Rule] Federally Enforceable Through Title V Permit
42. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit
43. 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), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
44. 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), and 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] Federally Enforceable Through Title V Permit
45. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

46. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit

47. On and after July 1, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contacts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

48. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such 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 and Rule 4320] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-311-38-18 **EXPIRATION DATE:** 12/31/2016

SECTION: 25 **TOWNSHIP:** 20S **RANGE:** 14E

EQUIPMENT DESCRIPTION:
58.5 MMBTU/HR SG 25-17 STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE LOW-NOX BURNER (OR DISTRICT APPROVED EQUIVALENT) AND FLUE GAS RECIRCULATION SERVED BY THE 25D NEPTUNE AIRPOL CAUSTIC SCRUBBER WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS

PERMIT UNIT REQUIREMENTS

1. This unit shall be fueled with natural gas, LPG, or a blend of natural gas and well casing and tank vapor recovery (TVR) gas. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Total gas consumption of this unit shall not exceed either of the following limits: 1,404 MMBtu/day or 457,800 MMBtu/year. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the boiler. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The caustic scrubber shall be operated to control SOx emissions when ever the steam generator is fueled with well casing and/or TVR gas. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Scrubber liquor pH shall be maintained between 6.5 and 8.0. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Tray packing flowrate shall be operated at 700 to 840 gallons/minute. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Quench flowrate shall be operated at 145 to 185 gallons/minute. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
9. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [County Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus)] Federally Enforceable Through Title V Permit
10. Emissions of sulfur compounds from this unit shall not exceed 200 lb/hr, calculated as SO2. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.4.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel 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
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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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, 9.3.2] Federally Enforceable Through Title V Permit
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 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
14. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: 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
15. Nitrogen oxide (NOx) emissions shall not exceed 140 lb/hr, calculated as NO2. [District Rules 4301, 5.2.2, 5.3, and 5.5 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
16. Emissions from the steam generator shall not exceed any of the following limits: 0.052 lb-SOx/MMBtu, 0.045 lb-PM10/MMBtu, or 0.008 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Except during start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 15 ppmvd NOx @ 3% O2, equivalent to 0.0182 lb-NOx/MMBtu or 50 ppmvd CO @ 3% O2, equivalent to 0.037 lb-CO/MMBtu. [District Rules 2201, 4301, 5.2, 4305, 5.1, and 4306, 5.1] Federally Enforceable Through Title V Permit
18. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 4305, 5.5.6 and 4306, 5.3] Federally Enforceable Through Title V Permit
20. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.25 and 3.22] Federally Enforceable Through Title V Permit
21. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 50.5 lb-NOx/day, 8,332 lb-NOx/yr, 51.9 lb-CO/day, or 16,939 lb-CO/yr. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

22. Source testing to measure natural gas-combustion NOx 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, 6.3.1, and 4306, 6.3.1] Federally Enforceable Through Title V Permit
23. NOx, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
24. 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 2520, 9.3.2, 4305, 5.5.5 and 4306, 5.5.5] Federally Enforceable Through Title V Permit
25. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit
26. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. The source test plan shall indicate which test method shall be used to demonstrate compliance. [District Rule 1081] Federally Enforceable Through Title V Permit
27. The results of each source test shall be submitted to the District within 60 days after the source test. [District Rule 1081] Federally Enforceable Through Title V Permit
28. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5.1 and 4306, 5.5.1] Federally Enforceable Through Title V Permit
29. NOx 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 2520, 9.3.2, 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
30. CO emissions for source test purposes shall be determined using EPA Method 10, 10B, or ARB Method 100. [District Rule 2520, 9.3.2 and 4305] Federally Enforceable Through Title V Permit
31. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 2520, 9.3.2, 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
32. Stack gas moisture content shall be determined using EPA Method 4. [District NSR Rule] Federally Enforceable Through Title V Permit
33. 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 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 2520, 9.3.2, 4305 and 4306] Federally Enforceable Through Title V Permit
34. 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 2520, 9.3.2, 4305 and 4306] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

35. 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 Rule 2520, 9.4.2 and 4305] Federally Enforceable Through Title V Permit

36. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx 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 2520, 9.3.2, 4305 and 4306] Federally Enforceable Through Title V Permit

37. Concentration measurements shall not be taken until the sample acquisition probe has been exposed to the stack gas for at least 150% of the response time. Measurements shall be taken in triplicate. [District Rule 2520, 9.4.2 and 4305] Federally Enforceable Through Title V Permit

38. If water vapor is not removed prior to measurement, the absolute humidity in the gas stream must be determined so that the gas concentrations may be reported on a dry basis. [District Rule 2520, 9.4.2 and 4305] Federally Enforceable Through Title V Permit

39. If water vapor creates an interference with the measurement of any component, then the water vapor must be removed from the gas stream prior to concentration measurements. [District Rule 2520, 9.4.2 and 4305] Federally Enforceable Through Title V Permit

40. Natural gas sulfur content and higher heating value (hhv) shall be certified by a third party fuel supplier of each fuel source or natural gas shall be tested for sulfur content and higher heating value (hhv) monthly. Waste gas shall be tested for sulfur content and higher heating value (hhv) not less than monthly. [District NSR Rule] Federally Enforceable Through Title V Permit

41. Copies of all gas purchase contracts, 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, fuel source, and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

42. Permittee shall maintain records of daily total gas consumption. [District Rule 1070 and 2520, 9.5.2] Federally Enforceable Through Title V Permit

43. Permittee shall maintain daily records of the tray packing flowrate and the quench flowrate. [District Rule 1070 and 2520, 9.5.2] Federally Enforceable Through Title V Permit

44. Permittee shall measure and record the BTU content of the gas burned at the time of NOx source testing, except for natural gas purchased from a PUC regulated utility. [District NSR Rule and 4801] Federally Enforceable Through Title V Permit

45. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District NSR Rule] Federally Enforceable Through Title V Permit

46. Permittee shall maintain with the permit a current listing of all TEOR and TVR systems providing vapor to this steam generator. [District NSR Rule] Federally Enforceable Through Title V Permit

47. Permittee shall maintain daily records of volume of fuel gas burned, TEOR/TVR gas incinerated, and permit number(s) of systems providing gas for incineration. [District NSR Rule] Federally Enforceable Through Title V Permit

48. 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, 2520, 9.4.2, 4305, 6.1, and 4306, 6.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

49. 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), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

50. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

51. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit

52. On and after July 1, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contacts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

53. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such 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 and Rule 4320] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-311-39-17 **EXPIRATION DATE:** 12/31/2016

SECTION: 25 **TOWNSHIP:** 20S **RANGE:** 14E

EQUIPMENT DESCRIPTION:
58.5 MMBTU/HR STRUTHERS THERMOFLOOD STEAM GENERATOR #25-18, MODEL OH-50-ND-16XAM, EQUIPPED WITH A NORTH AMERICAN GAS AND OIL BURNER AND FLUE GAS RECIRCULATION SERVED BY THE 25D NEPTUNE AIRPOL CAUSTIC SCRUBBER WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS.

PERMIT UNIT REQUIREMENTS

1. This unit shall be fueled with natural gas, LPG, or a blend of natural gas and well casing and tank vapor recovery (TVR) gas. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Total gas consumption shall not exceed 1,404 MMBtu/day nor 457,800 MMBtu/year. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The permittee shall install and maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the boiler. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The caustic scrubber shall be operated to control SOx emissions when ever the steam generator is fueled with well casing and/or TVR gas. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Scrubber liquor pH shall be maintained between 6.5 and 8.0. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Tray packing flowrate shall be operated at 700 to 840 gallons/minute. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Quench flowrate shall be operated at 145 to 185 gallons/minute. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
9. Nitrogen oxide (NOx) emissions shall not exceed 140 lb/hr, calculated as NO2. [District Rules 4301, 5.2.2 and 5.3, and 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. Emissions from this unit shall not exceed any of the following limits: 0.0520 lb-SOx/MMBtu, 0.045 lb-PM10/MMBtu, or 0.008 lb-VOC/MMBtu. [District NSR Rule]
11. Except during startup and shutdown, emissions from this unit shall not exceed any of the following limits: 15 ppmvd NOx @ 3% O2 or 0.018 lb-NOx/MMBtu, or 50 ppmvd CO @ 3% O2 or 0.037 lb-CO/MMBtu. [District NSR Rule and District Rules 4305 and 4306]
12. During startup and shutdown, emission rates from the unit shall not exceed any of the following limits: 5.85 lb-NOx/hr, 3.04 lb-SOx/hr, 2.63 lb-PM10/hr, 4.91 lb-CO/hr, or 0.47 lb-VOC/hr. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

13. Duration of startup and shutdown shall not exceed two hours each per occurrence and, combined, shall not exceed 4 hours per day. During startup or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of startup and shutdown periods. [District Rule 4306, 5.3.1] Federally Enforceable Through Title V Permit
14. Startup is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.25 and 3.22] Federally Enforceable Through Title V Permit
15. Source testing to measure natural gas-combustion NOx 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, 6.3.1 and 4306, 6.3.1] Federally Enforceable Through Title V Permit
16. 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
17. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5.1 and 4306, 5.5.1] Federally Enforceable Through Title V Permit
18. NOx, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
19. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit
20. Sampling facilities for source testing shall be provided in accordance with the provisions of rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
21. 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, 5.5.2 and 4306, 5.5.2] Federally Enforceable Through Title V Permit
22. 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, 5.5.5 and 4306, 5.5.5] Federally Enforceable Through Title V Permit
23. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
24. NOx 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, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
25. CO emissions for source test purposes shall be determined using EPA Method 10, 10B, or ARB Method 100. [District Rule 2520, 9.3.2 and 4305] Federally Enforceable Through Title V Permit
26. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306, 6.2.4] Federally Enforceable Through Title V Permit
27. 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 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, 5.4.2 and 4306, 5.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

28. 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 and 4306, 5.4.2] Federally Enforceable Through Title V Permit

29. 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, 5.5.4] Federally Enforceable Through Title V Permit

30. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx 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, 6.1] Federally Enforceable Through Title V Permit

31. Emissions of sulfur compounds from this unit shall not exceed 200 lb/hr, calculated as SO2. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit

32. 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel 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, 9.3.2] Federally Enforceable Through Title V Permit

33. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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, 9.3.2] Federally Enforceable Through Title V Permit

34. 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 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

35. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rules 2520, 9.3.2, 4305, 6.2.1, 4306, 6.2.1, and 4351, 6.2.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

36. Stack gas moisture content shall be determined using EPA Method 4. [District NSR Rule] Federally Enforceable Through Title V Permit

37. Natural gas sulfur content and higher heating value (hhv) shall be certified by a third party fuel supplier of each fuel source or natural gas shall be tested for sulfur content and higher heating value (hhv) monthly. Waste gas shall be tested for sulfur content and higher heating value (hhv) not less than monthly. [District NSR Rule] Federally Enforceable Through Title V Permit

38. Annual test results to the District from unit(s) representing a group of units may be used to measure NOx emissions of this permit for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NOx emission limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. [District Rules 2520, 9.3.2, 4306, 6.3.2, and 4305, 6.3.2] Federally Enforceable Through Title V Permit

39. The following conditions must be met for representative unit(s) to be used to test for NOx limits for a group of units: 1) all units are initially source tested and emissions from each unit in group are less than 90% of the permitted value and vary 25% or less from the average of all runs, 2) all units in group are similar in terms of rated heat input (rating not to exceed 100 MMBtu/hr), make and series, operation conditions, and control method, and 3) the group is owned by a single owner and located at a single stationary source. [District Rules 2520, 9.3.2, 4306, 6.3.2, and 4305, 6.3.2] Federally Enforceable Through Title V Permit

40. All units in a group for which representative units are source for NOx emissions shall have received the same maintenance and tune-up procedures as the representative unit(s). Records shall be maintained for the each unit of the group including all preventative and corrective maintenance work done. [District Rules 2520, 9.3.2, 4306, 6.3.2, and 4305, 6.3.2] Federally Enforceable Through Title V Permit

41. All units in a group for which representative units are source tested for NOx emissions for this permit shall be fired on the same fuel type during the entire compliance period. If a unit switches for any time to an alternate fuel type (e.g. from natural gas to oil) then that unit shall not be considered part of the group and shall be required to undergo a source test for all fuel types used, within one year of the switch. [District Rules 2520, 9.3.2, 4306, and 4305, 6.3.2] Federally Enforceable Through Title V Permit

42. The number of representative units source tested for NOx emissions shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that in 3 years, all units in the entire group will have been tested at least once. [District Rules 2520, 9.3.2, 4305, 6.3.2, and 4306, 6.3.2] Federally Enforceable Through Title V Permit

43. Copies of all gas purchase contracts, 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, fuel source, 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

44. Permittee shall record daily total gas consumption. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

45. Daily records of the tray packing flowrate and the quench flowrate shall be maintained, retained on the premises for a period of at least five years, and made available for District inspection upon request. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

46. Permittee shall measure and record the BTU content of the gas burned at the time of NOx source testing, except for natural gas purchased from a PUC regulated utility. [District NSR Rule and District Rule 4801] Federally Enforceable Through Title V Permit

47. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District NSR Rule] Federally Enforceable Through Title V Permit

48. Permittee shall maintain with the permit a current listing of all TEOR and TVR systems providing vapor to this steam generator and shall make such listing readily available for District inspection upon request [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

49. Permittee shall maintain daily records of volume of fuel gas burned, TEOR/TVR gas incinerated, and permit number(s) of systems providing gas for incineration. [District NSR Rule] Federally Enforceable Through Title V Permit

50. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit

51. 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), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

52. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

53. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit

54. On and after July 1, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contacts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

55. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such 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 and Rule 4320] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-311-40-16 **EXPIRATION DATE:** 12/31/2016

SECTION: 25 **TOWNSHIP:** 20S **RANGE:** 14E

EQUIPMENT DESCRIPTION:
58.5 MMBTU/HR NATURAL GAS, LPG OR PROCESS GAS FIRED STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE BURNER, FLUE GAS RECIRCULATION SYSTEM, AN OXYGEN CONTROLLER, SERVED BY THE NEPTUNE AIRPOL CAUSTIC SCRUBBER WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS (COMMON TO C-311-37) (SG-25-19)

PERMIT UNIT REQUIREMENTS

1. This unit shall be fueled with natural gas, LPG, or a blend of natural gas and well casing and tank vapor recovery (TVR) gas. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Fuel consumption shall not exceed 434,700 MMBtu/year. [District NSR Rule] 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 NSR Rule] Federally Enforceable Through Title V Permit
4. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The caustic scrubber shall be operated to control SOx emissions when ever the steam generator is fueled with well casing and/or TVR gas. [District NSR Rule]
6. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
7. Nitrogen oxide (NOx) emissions shall not exceed 140 lb/hr, calculated as NO2. [District Rules 4301, 5.2.2, 5.3, and 5.5 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. Emissions from this unit shall not exceed any of the following limits: 0.052 lb-SOx/MMBtu, 0.045 lb-PM10/MMBtu, or 0.0055 lb-VOC/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Except during startup and shutdown, emissions from this unit shall not exceed any of the following limits: 15 ppmvd NOx @ 3% O2 or 0.018 lb-NOx/MMBtu, or 50 ppmvd CO @ 3% O2 or 0.037 lb-CO/MMBtu. [District NSR Rule and District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
10. During startup and shutdown, emission rates from the unit shall not exceed any of the following limits: 5.85 lb-NOx/hr, 3.04 lb-SOx/hr, 2.63 lb-PM10/hr, 4.91 lb-CO/hr, or 0.32 lb-VOC/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Duration of startup and shutdown shall not exceed two hours each per occurrence and, combined, shall not exceed 4 hours per day. During startup or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of startup and shutdown periods. [District Rule 4306, 5.3.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

12. Startup is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.25 and 3.22] Federally Enforceable Through Title V Permit
13. Source testing to measure natural gas-combustion NOx 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, 6.3.1 and 4306, 6.3.1] Federally Enforceable Through Title V Permit
14. 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
15. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305,5.5.1 and 4306, 5.5.1] Federally Enforceable Through Title V Permit
16. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). [District Rule 1081] 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, 5.5.2 and 4306, 5.5.2] 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, 5.5.5 and 4306, 5.5.5] Federally Enforceable Through Title V Permit
19. 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
20. NOx 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, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
21. CO emissions for source test purposes shall be determined using EPA Method 10, 10B, or ARB Method 100. [District Rule 2520, 9.3.2 and 4305] Federally Enforceable Through Title V Permit
22. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
23. 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 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, 5.4.2 and 4306, 5.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

24. 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, 5.4.2 and 4306, 5.4.2] Federally Enforceable Through Title V Permit

25. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.4.2 and 4306, 5.4.2 and 5.5.4] Federally Enforceable Through Title V Permit

26. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx 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, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit

27. Emissions of sulfur compounds from this unit shall not exceed 200 lb/hr, calculated as SO2. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit

28. 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel 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, 9.3.2 and District NSR Rule] Federally Enforceable Through Title V Permit

29. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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, 9.3.2] Federally Enforceable Through Title V Permit

30. 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 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

31. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rules 2520, 9.3.2; 4305, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

32. Annual test results to the District from unit(s) representing a group of units may be used to measure NOx emissions of this permit for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NOx emission limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. [District Rules 2520, 9.3.2, 4306, 6.3.2, and 4305, 6.3.2] Federally Enforceable Through Title V Permit

33. The following conditions must be met for representative unit(s) to be used to test for NOx limits for a group of units: 1) all units are initially source tested and emissions from each unit in group are less than 90% of the permitted value and vary 25% or less from the average of all runs, 2) all units in group are similar in terms of rated heat input (rating not to exceed 100 MMBtu/hr), make and series, operation conditions, and control method, and 3) the group is owned by a single owner and located at a single stationary source. [District Rules 2520, 9.3.2, 4306, 6.3.2, and 4305, 6.3.2] Federally Enforceable Through Title V Permit

34. All units in a group for which representative units are source for NOx emissions shall have received the same maintenance and tune-up procedures as the representative unit(s). Records shall be maintained for the each unit of the group including all preventative and corrective maintenance work done. [District Rules 2520, 9.3.2, 4306, 6.3.2, and 4305, 6.3.2] Federally Enforceable Through Title V Permit

35. All units in a group for which representative units are source tested for NOx emissions for this permit shall be fired on the same fuel type during the entire compliance period. If a unit switches for any time to an alternate fuel type (e.g. from natural gas to oil) then that unit shall not be considered part of the group and shall be required to undergo a source test for all fuel types used, within one year of the switch. [District Rules 2520, 9.3.2, 4306, 6.3.2, and 4305, 6.3.2] Federally Enforceable Through Title V Permit

36. The number of representative units source tested for NOx emissions shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that in 3 years, all units in the entire group will have been tested at least once. [District Rule 2520, 9.3.2, 4305, 6.3.2, and 4306, 6.3.2] Federally Enforceable Through Title V Permit

37. Copies of all gas purchase contracts, supplier certifications, and test results (including fuel hhv) 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, fuel source, 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 and District NSR Rule] Federally Enforceable Through Title V Permit

38. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit

39. 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), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

40. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

41. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit

42. On and after July 1, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contacts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

43. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such 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 and Rule 4320] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-311-41-13 **EXPIRATION DATE:** 12/31/2016

SECTION: 25 **TOWNSHIP:** 20S **RANGE:** 14E

EQUIPMENT DESCRIPTION:
58.5 MMBTU/HR SG 25-20 STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE BURNER AND FLUE GAS RECIRCULATION SYSTEM, SERVED BY THE NEPTUNE AIRPOL CAUSTIC SCRUBBER WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS

PERMIT UNIT REQUIREMENTS

1. Total LPG, casing gas, waste gas, and natural gas consumption shall not exceed 435,000 MMBtu/year. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The caustic scrubber shall be operated to control SOx emissions when ever the steam generator is fueled with well casing and/or TVR gas. [District NSR Rule]
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 NSR Rule] Federally Enforceable Through Title V Permit
4. Nitrogen oxide (NOx) emissions shall not exceed 140 lb/hr, calculated as NO2. [District Rules 4301, 5.2.2, 5.3, and 5.5 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
5. Emissions from this unit shall not exceed any of the following limits: 0.052 lb-SOx/MMBtu, 0.044 lb-PM10/MMBtu, or 0.0085 lb-VOC/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Except during startup and shutdown, emissions from this unit shall not exceed any of the following limits: 15 ppmvd NOx @ 3% O2 or 0.018 lb-NOx/MMBtu, or 50 ppmvd CO @ 3% O2 or 0.037 lb-CO/MMBtu. [District NSR Rule and District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
7. During startup and shutdown, emission rates from the unit shall not exceed any of the following limits: 5.85 lb-NOx/hr, 3.04 lb-SOx/hr, 2.57 lb-PM10/hr, 4.91 lb-CO/hr, or 0.50 lb-VOC/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Duration of startup and shutdown shall not exceed two hours each per occurrence and, combined, shall not exceed 4 hours per day. During startup or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of startup and shutdown periods. [District Rule 4306, 5.3.1] Federally Enforceable Through Title V Permit
9. Startup is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.25 and 3.22] Federally Enforceable Through Title V Permit
10. Source testing to measure natural gas-combustion NOx 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 2520, 9.3.2, 4305 and 4306] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

11. NOx, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. 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
13. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306, 5.5.1] Federally Enforceable Through Title V Permit
14. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit
15. 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, 5.5.2] Federally Enforceable Through Title V Permit
16. 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, 5.5.5] Federally Enforceable Through Title V Permit
17. 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
18. NOx 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 and 4306, 6.2.2] Federally Enforceable Through Title V Permit
19. CO emissions for source test purposes shall be determined using EPA Method 10, 10B, or ARB Method 100. [District Rule 2520, 9.3.2 and 4305] Federally Enforceable Through Title V Permit
20. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306, 6.2.4] Federally Enforceable Through Title V Permit
21. 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 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, 5.4.2] Federally Enforceable Through Title V Permit
22. 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 and 4306, 5.4.2] Federally Enforceable Through Title V Permit
23. 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, 5.5.5] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

24. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx 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, 6.1] Federally Enforceable Through Title V Permit

25. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit

26. Emissions of sulfur compounds from this unit shall not exceed 200 lb/hr, calculated as SO2. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit

27. 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel 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, 9.3.2 and District NSR Rule] Federally Enforceable Through Title V Permit

28. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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, 9.3.2] Federally Enforceable Through Title V Permit

29. 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 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

30. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rules 2520, 9.3.2; 4305, 6.2.1; 4306; and 4351, 6.2.1] Federally Enforceable Through Title V Permit

31. Annual test results to the District from unit(s) representing a group of units may be used to measure NOx emissions of this permit for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NOx emission limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. [District Rules 2520, 9.3.2, 4306, and 4305, 6.3.2] Federally Enforceable Through Title V Permit

32. The following conditions must be met for representative unit(s) to be used to test for NOx limits for a group of units: 1) all units are initially source tested and emissions from each unit in group are less than 90% of the permitted value and vary 25% or less from the average of all runs, 2) all units in group are similar in terms of rated heat input (rating not to exceed 100 MMBtu/hr), make and series, operation conditions, and control method, and 3) the group is owned by a single owner and located at a single stationary source. [District Rules 2520, 9.3.2, 4306, and 4305, 6.3.2] Federally Enforceable Through Title V Permit

33. All units in a group for which representative units are source for NOx emissions shall have received the same maintenance and tune-up procedures as the representative unit(s). Records shall be maintained for the each unit of the group including all preventative and corrective maintenance work done. [District Rules 2520, 9.3.2, 4306, and 4305, 6.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

34. All units in a group for which representative units are source tested for NOx emissions for this permit shall be fired on the same fuel type during the entire compliance period. If a unit switches for any time to an alternate fuel type (e.g. from natural gas to oil) then that unit shall not be considered part of the group and shall be required to undergo a source test for all fuel types used, within one year of the switch. [District Rules 2520, 9.3.2, 4306, and 4305, 6.3.2] Federally Enforceable Through Title V Permit

35. The number of representative units source tested for NOx emissions shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that in 3 years, all units in the entire group will have been tested at least once. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

36. Copies of all gas purchase contracts, supplier certifications, and test results (including fuel hhv) 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, fuel source, 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 and District NSR Rule] Federally Enforceable Through Title V Permit

37. Permittee shall record natural gas, propane, casing gas and waste gas consumption. [District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit

38. Permittee shall measure and record the BTU content of the gas burned at the time of NOx testing, except for natural gas purchased from a PUC regulated utility. [District NSR Rule and District Rule 4801] Federally Enforceable Through Title V Permit

39. Permittee shall maintain with the permit a current listing of all TEOR and TVR systems providing vapor to this steam generator and shall make such listing readily available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit

40. Permittee shall maintain daily records of volume of fuel gas burned, TEOR/TVR gas incinerated, and permit number(s) of systems providing gas for incineration. [District NSR Rule] Federally Enforceable Through Title V Permit

41. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit

42. 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), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

43. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

44. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit

45. On and after July 1, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contacts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

46. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such 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 and Rule 4320] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-311-76-10 **EXPIRATION DATE:** 12/31/2016

SECTION: 6C **TOWNSHIP:** 20S **RANGE:** 15E

EQUIPMENT DESCRIPTION:
58.5 MMBTU/HR STRUTHERS THERMOFLOOD (SG 6-38) MODEL OH-50-ND-16XAM NATURAL GAS/LPG/TEOR GAS-FIRED STEAM GENERATOR WITH A NORTH AMERICAN MODEL MAGNA FLAME GLE LOW NOX BURNER AND FLUE GAS RECIRCULATION SYSTEM INCLUDING AN OXYGEN CONTROLLER

PERMIT UNIT REQUIREMENTS

1. This unit shall be fired exclusively with natural gas, LPG, or TEOR gas. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Total fuel consumption shall not exceed 1,404 MMBtu/day nor 434,700 MMBtu/year. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The permittee shall install and maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the boiler. [District NSR Rule] 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. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
6. Emissions of sulfur compounds from this unit shall not exceed 200 lb/hr, calculated as SO2. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.4.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit
7. 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel 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
8. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

9. 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 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: 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
11. Nitrogen oxide (NOx) emissions shall not exceed 140 lb/hr, calculated as NO2. [District Rules 4301, 5.2.2, 5.3, and 5.5 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
12. Except during start-up and shutdown, emissions from this steam generator shall not exceed any of the following limits: 15 ppmvd NOx @ 3% O2 or 0.018 lb-NOx/MMBtu, 0.043 lb-SOx/MMBtu, 0.00675 lb-PM10/MMBtu, 50 ppmvd CO @ 3% O2 or 0.037 lb-CO/MMBtu, or 0.00855 lb-VOC/MMBtu. [District NSR Rule and District Rule 4306, 5.1] Federally Enforceable Through Title V Permit
13. During start-up and shutdown, emissions from this steam generator shall not exceed any of the following limits: 0.1 lb-NOx/MMBtu, 0.043 lb-SOx/MMBtu, 0.00675 lb-PM10/MMBtu, 0.084 lb-CO/MMBtu, or 0.00855 lb-VOC/MMBtu. [District NSR Rule and District Rule 4306, 5.1] Federally Enforceable Through Title V Permit
14. Maximum emissions from this steam generator, including start-up and shutdown operation, shall not exceed any of the following limits: 50.5 lb-NOx in any one day, 7,825 lb-NOx in any calendar year, 66.4 lb-CO in any one day, or 16,084 lb-CO in any calendar year. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Start-up is defined as that period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as that period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.22, 3.25] Federally Enforceable Through Title V Permit
16. The duration of each start-up or each shutdown shall not exceed two hours per occurrence. The emission control system shall be in operation and emissions shall be minimized insofar as technologically feasible during start-up or shutdown. The operator shall maintain daily records of the number and duration of start-up and shutdown periods. [District Rule 4306, 5.3] Federally Enforceable Through Title V Permit
17. Source testing to measure NOx and CO emissions from this unit while fired on natural gas 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 and 4306, 6.3] Federally Enforceable Through Title V Permit
18. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit
19. NOx, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
20. The source plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5.1 and 4306, 5.5.1] Federally Enforceable Through Title V Permit
21. 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, 5.5.2 and 4306, 5.5.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

22. 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, 5.5.5 and 4306, 5.5.5] Federally Enforceable Through Title V Permit

23. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

24. The results of each source test shall be submitted to the District within 60 days after completion of the test. [District Rule 1081] Federally Enforceable Through Title V Permit

25. NOx 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 and 4306, 6.2] Federally Enforceable Through Title V Permit

26. CO emissions for source test purposes shall be determined using EPA Method 10, 10B, or ARB Method 100. [District Rule 2520, 9.3.2 and 4305] Federally Enforceable Through Title V Permit

27. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306, 6.2] Federally Enforceable Through Title V Permit

28. 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 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, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit

29. 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, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit

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, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit

31. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx 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, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit

32. The portable analyzer shall be calibrated as recommended by the manufacturer. All instrument calibration data shall be kept on file including the date of calibration. The calibration date shall not exceed 3 months prior to the date the stack concentrations are measured and recorded. [District Rule 2520, 9.4.2 and 4305] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

33. Concentration measurements shall not be taken until the sample acquisition probe has been exposed to the stack gas for at least 150% of the response time. Measurements shall be taken in triplicate. [District Rule 2520, 9.4.2 and 4305] Federally Enforceable Through Title V Permit

34. If water vapor is not removed prior to measurement, the absolute humidity in the gas stream must be determined so that the gas concentrations may be reported on a dry basis. [District Rule 2520, 9.4.2 and 4305] Federally Enforceable Through Title V Permit

35. If water vapor creates an interference with the measurement of any component, then the water vapor must be removed from the gas stream prior to concentration measurements. [District Rule 2520, 9.4.2 and 4305] Federally Enforceable Through Title V Permit

36. Natural gas or LPG sulfur content and higher heating value (hhv) shall be certified by a third party fuel supplier of each fuel source or natural gas or LPG shall be tested for sulfur content and higher heating value (hhv) monthly. Casing gas shall be tested for sulfur content and higher heating value (hhv) not less than monthly. [District NSR Rule] Federally Enforceable Through Title V Permit

37. Copies of all gas purchase contracts, 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, fuel source, and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

38. Permittee shall record daily natural gas, casing gas, and propane consumption. Records shall be provided to the District upon request. [District NSR Rule] Federally Enforceable Through Title V Permit

39. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District NSR Rule] Federally Enforceable Through Title V Permit

40. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070; 4305, 6.1; and 4306, 6.1] Federally Enforceable Through Title V Permit

41. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements of District Rules 1081 (Amended December 16, 1993), 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

42. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

43. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit

44. On and after July 1, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contacts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

45. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such 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 and Rule 4320] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-311-84-10 **EXPIRATION DATE:** 12/31/2016

SECTION: 6C **TOWNSHIP:** 20S **RANGE:** 15E

EQUIPMENT DESCRIPTION:
58.5 MMBTU/HR STRUTHERS THERMOFLOOD (SG 6-37) MODELOH5O-ND-16XAM NATURAL GAS/LPG/TEOR GAS (COMMON TO C-311-37, SG 25-19) FIRED STEAM GENERATOR WITH A NORTH AMERICAN MODEL MAGNA FLAME GLE LOW NOX BURNER AND FLUE GAS RECIRCULATION

PERMIT UNIT REQUIREMENTS

1. This unit shall be fired exclusively with natural gas, LPG, or TEOR gas. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Total fuel consumption shall not exceed 1,404 MMBtu/day nor 434,700 MMBtu/year. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The permittee shall install and maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the boiler. [District NSR Rule] 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. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
6. Emissions of sulfur compounds from this unit shall not exceed 200 lb/hr, calculated as SO2. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.4.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit
7. 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel 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
8. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

9. 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 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. Nitrogen oxide (NOx) emissions shall not exceed 140 lb/hr, calculated as NO2. [District Rules 4301, 5.2.2, 5.3, and 5.5 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
11. Except during start-up and shutdown, emissions from this steam generator shall not exceed any of the following limits: 15 ppmvd NOx @ 3% O2 or 0.018 lb-NOx/MMBtu, 0.043 lb-SOx/MMBtu, 0.00675 lb-PM10/MMBtu, 50 ppmvd CO @ 3% O2 or 0.037 lb-CO/MMBtu, or 0.00855 lb-VOC/MMBtu. [District NSR Rule and District Rule 4306, 5.1] Federally Enforceable Through Title V Permit
12. During start-up and shutdown, emissions from this steam generator shall not exceed any of the following limits: 0.1 lb-NOx/MMBtu, 0.043 lb-SOx/MMBtu, 0.00675 lb-PM10/MMBtu, 0.084 lb-CO/MMBtu, or 0.00855 lb-VOC/MMBtu. [District NSR Rule and District Rule 4306, 5.1] Federally Enforceable Through Title V Permit
13. Maximum emissions from this steam generator, including start-up and shutdown operation, shall not exceed any of the following limits: 50.5 lb-NOx in any one day, 7,825 lb-NOx in any calendar year, 66.4 lb-CO in any one day, or 16,084 lb-CO in any calendar year. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Start-up is defined as that period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as that period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.22, 3.25] Federally Enforceable Through Title V Permit
15. The duration of each start-up or each shutdown shall not exceed two hours per occurrence. The emission control system shall be in operation and emissions shall be minimized insofar as technologically feasible during start-up or shutdown. The operator shall maintain daily records of the number and duration of start-up and shutdown periods. [District Rule 4306, 5.3] Federally Enforceable Through Title V Permit
16. Source testing to measure NOx and CO emissions from this unit while fired on natural gas 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 and 4306, 6.3] Federally Enforceable Through Title V Permit
17. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit
18. NOx, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
19. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5.1 and 4306, 5.5.1] Federally Enforceable Through Title V Permit
20. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 5.5.2 and 4306, 5.5.2] Federally Enforceable Through Title V Permit
21. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5.5 and 4306, 5.5.5] Federally Enforceable Through Title V Permit
22. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

23. The results of each source test shall be submitted to the District within 60 days after completion of the test. [District Rule 1081] Federally Enforceable Through Title V Permit

24. NOx 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 and 4306, 6.2] Federally Enforceable Through Title V Permit

25. CO emissions for source test purposes shall be determined using EPA Method 10, 10B, or ARB Method 100. [District Rule 2520, 9.3.2 and 4305] Federally Enforceable Through Title V Permit

26. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306, 6.2] Federally Enforceable Through Title V Permit

27. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: 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

28. 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 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, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit

29. 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, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit

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, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit

31. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx 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, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit

32. Natural gas or LPG sulfur content and higher heating value (hhv) shall be certified by a third party fuel supplier of each fuel source; or natural gas or LPG shall be tested for sulfur content and higher heating value (hhv) monthly. Casing gas shall be tested for sulfur content and higher heating value (hhv) not less than monthly. [District NSR Rule] Federally Enforceable Through Title V Permit

33. Permittee shall record daily natural gas, casing gas, and propane consumption. Records shall be provided to the District upon request. [District NSR Rule] Federally Enforceable Through Title V Permit

34. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

35. Copies of all gas purchase contracts, 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, fuel source, and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

36. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070; 4305, 6.1; and 4306, 6.1] Federally Enforceable Through Title V Permit

37. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements of District Rules 1081 (Amended December 16, 1993), 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

38. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

39. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit

40. On and after July 1, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contacts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

41. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such 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 and Rule 4320] Federally Enforceable Through Title V Permit