



JUN 03 2016

Mr. Bill Davidson
TRC Operation Company, Inc.
P O Box 227
Taft, CA 93268

Re: Notice of Minor Title V Permit Modification
District Facility # S-2622
Project # S-1161426

Dear Mr. Davidson:

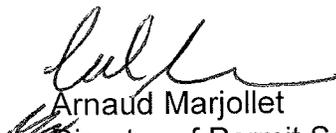
Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authority to Construct (ATC) S-2622-17-4 (under project S-1160892) into the Title V operating permit. The ATC designates 62.5 MMBtu/hr natural gas-fired steam generator S-2622-17 as a compliant Dormant Emissions Unit (DEU).

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct (ATC) S-2622-17-4, 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.

If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Thank you for your cooperation in this matter.

Sincerely,



Arnaud Marjollet
Director of Permit Services

Enclosures

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

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

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

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

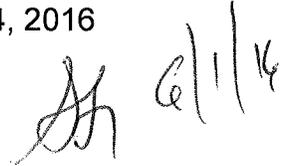
TITLE V APPLICATION REVIEW

Minor Modification
Project #: S-1161426

Engineer: Homero Ramirez

Date: May 24, 2016

Facility Number: S-2622
Facility Name: TRC Operation Company, Inc.
Mailing Address: P O Box 227
Taft, CA 93268



Contact Name: Bill Davidson
Phone: (661) 763-0081

Responsible Official: Bill Davidson
Title: HES Director

I. PROPOSAL

TRC Operation Company, Inc. is proposing a Title V minor permit modification to incorporate recently issued Authority to Construct (ATC) S-2622-17-4 (under project S-1160892) into the Title V operating permit. The ATC designates 62.5 MMBtu/hr natural gas-fired steam generator S-2622-17 as a compliant Dormant Emissions Unit (DEU).

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

II. FACILITY LOCATION

The equipment is located at the NE/4 of Section 22, Township 29S, Range 21E, at its Kern County Heavy Oil Western stationary source.

III. EQUIPMENT DESCRIPTION

S-2622-17-5: 62.5 MMBTU/HR C.E. NATCO NATURAL GAS FIRED STEAM GENERATOR (#59 DIS# 22456-79) WITH MAGNA FLAME GLE LOW NOX BURNER AND O2 CONTROLLER

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

TRC Operation Company, Inc. requests to designate 62.5 MMBtu/hr natural gas-fired steam generator S-2622-17 as a compliant Dormant Emissions Unit (DEU).

S-2622-17-5:

Permit conditions 1 through 6 were added to the proposed Permit to Operate to specify the terms for designating the heater a Dormant Emission Unit.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which

the source would otherwise be subject. Such terms and conditions include;

- a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
 6. Do not seek to consolidate overlapping applicable requirements.

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

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit No. S-2622-17-5
- B. Authority to Construct No. S-2622-17-4
- C. Application
- D. Previous Title V Operating Permit No. S-2622-17-3

ATTACHMENT A

Proposed Modified Title V Operating Permit No.
S-2622-17-5

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-2622-17-5

EXPIRATION DATE: 05/31/2017

SECTION: NE22 TOWNSHIP: 29S RANGE: 21E

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR C.E. NATCO NATURAL GAS FIRED STEAM GENERATOR (#59 DIS# 22456-79) WITH MAGNA FLAME GLE LOW NOX BURNER AND O2 CONTROLLER

PERMIT UNIT REQUIREMENTS

1. While dormant, the fuel line shall be physically disconnected from the unit. [District Rule 2080] Federally Enforceable Through Title V Permit
2. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080] Federally Enforceable Through Title V Permit
3. While dormant, normal source testing shall not be required. [District Rule 2080] Federally Enforceable Through Title V Permit
4. Upon recommencing operation of this unit, normal source testing shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
5. Any source testing required by this permit shall be performed within 60 days of recommencing operation of this unit, regardless of whether the unit remains active or is again designated as dormant. [District Rule 2080] Federally Enforceable Through Title V Permit
6. Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
7. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
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. 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
10. Emissions from this unit shall not exceed any of the following limits: 15 ppmvd NO_x @ 3% O₂ or 0.018 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 47.5 ppmvd CO @ 3% O₂ or 0.035 lb-CO/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
11. Steam generator shall be fired on natural gas and/or TEOR gas from S-2622-7 with a sulfur content of no greater than 1.0 gr-S/100 scf or pre-treated using a sulfa-treat (or equivalent) system for 95% control of SO_x emissions. [District Rules 2201, 4320 and 4801] Federally Enforceable Through Title V Permit
12. When complying with sulfur emission limits by fuel analysis, each fuel source shall be tested at startup and annually thereafter for sulfur content. Gas analyses shall be performed using EPA Method 11 or Method 15. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: TRC OPERATION COMPANY, INC.

Location: HEAVY OIL WESTERN, CA

S-2622-17-5, May 24 2016, 9:52AM - RAMIREZH

13. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
14. If either the NO_x or CO concentrations corrected to 3% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
15. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
16. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
17. Source testing to measure NO_x and CO emissions from this unit while fired on vapor control/TEOR gas from S-2622-7 shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
18. Source testing to measure natural gas-combustion NO_x and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
19. 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
20. 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
21. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
22. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
23. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

DRAFT

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
25. 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
26. 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 performed in the laboratory. [District Rule 2520] Federally Enforceable Through Title V Permit
27. If fuel analysis is used to demonstrate compliance with conditions of this permit, the fuel higher heating value for each fuel shall be certified by a third party fuel supplier or determined by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520; 4305; and 4351] Federally Enforceable Through Title V Permit
28. Permittee shall maintain accurate records of sulfur content of gas combusted in steam generator and shall make such records readily available for District inspection upon request. [District Rules 1070 and 4320] 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, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
30. 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
31. 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
32. 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 contracts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

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

DRAFT

ATTACHMENT B

Authority to Construct No.
S-2622-17-4



AUTHORITY TO CONSTRUCT

PERMIT NO: S-2622-17-4

ISSUANCE DATE: 03/17/2016

LEGAL OWNER OR OPERATOR: TRC OPERATION COMPANY, INC.

MAILING ADDRESS: P.O. BOX 227
TAFT, CA 93268

LOCATION: HEAVY OIL WESTERN
CA

SECTION: NE22 **TOWNSHIP:** 29S **RANGE:** 21E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 62.5 MMBTU/HR C.E. NATCO NATURAL GAS FIRED STEAM GENERATOR (#59 DIS# 22456-79) WITH MAGNA FLAME GLE LOW NOX BURNER AND O2 CONTROLLER (#59 DIS# 22456-79): DESIGNATE AS A COMPLIANT DORMANT EMISSIONS UNIT

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. While dormant, the fuel line shall be physically disconnected from the unit. [District Rule 2080] Federally Enforceable Through Title V Permit
3. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080] Federally Enforceable Through Title V Permit
4. While dormant, normal source testing shall not be required. [District Rule 2080] Federally Enforceable Through Title V Permit
5. Upon recommencing operation of this unit, normal source testing shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
6. Any source testing required by this permit shall be performed within 60 days of recommencing operation of this unit, regardless of whether the unit remains active or is again designated as dormant. [District Rule 2080] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO



Arnaud Marjollet, Director of Permit Services

S-2622-17-4 Mar 17 2016 4:52PM -- RAMIREZH Joint Inspection NOT Required

7. Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
8. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
9. 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
10. 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
11. Emissions from this unit shall not exceed any of the following limits: 15 ppmvd NOx @ 3% O2 or 0.018 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 47.5 ppmvd CO @ 3% O2 or 0.035 lb-CO/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
12. Steam generator shall be fired on natural gas and/or TEOR gas from S-2622-7 with a sulfur content of no greater than 1.0 gr-S/100 scf or pre-treated using a sulfa-treat (or equivalent) system for 95% control of SOx emissions. [District Rules 2201, 4320 and 4801] Federally Enforceable Through Title V Permit
13. When complying with sulfur emission limits by fuel analysis, each fuel source shall be tested at startup and annually thereafter for sulfur content. Gas analyses shall be performed using EPA Method 11 or Method 15. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
14. 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
15. 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
16. 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
17. 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
18. Source testing to measure NOx and CO emissions from this unit while fired on vapor control/TEOR gas from S-2622-7 shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
20. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
21. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
22. 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, 4306 and 4320] Federally Enforceable Through Title V Permit
23. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
24. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
25. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
26. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
27. 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 performed in the laboratory. [District Rule 2520] Federally Enforceable Through Title V Permit
28. If fuel analysis is used to demonstrate compliance with conditions of this permit, the fuel higher heating value for each fuel shall be certified by a third party fuel supplier or determined by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520; 4305; and 4351] Federally Enforceable Through Title V Permit
29. Permittee shall maintain accurate records of sulfur content of gas combusted in steam generator and shall make such records readily available for District inspection upon request. [District Rules 1070 and 4320] 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, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
31. 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
32. 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
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 contracts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

ATTACHMENT C

Application

San Joaquin Valley Air Pollution Control District

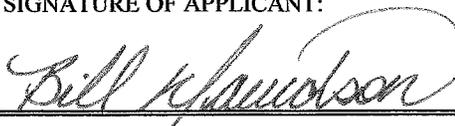
www.valleyair.org

Permit Application For:

ADMINISTRATIVE
AMENDMENT

MINOR
MODIFICATION

SIGNIFICANT
MODIFICATION

1. PERMIT TO BE ISSUED TO: <p style="text-align: center;">TRC Operating Company</p>	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>805 Black Gold Ct</u> CITY: <u>Taft</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93268</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: _____ CITY: _____ NE ¼ SECTION <u>22</u> TOWNSHIP <u>29S</u> RANGE <u>21E</u>	INSTALLATION DATE: N/A
4. GENERAL NATURE OF BUSINESS: Crude Oil Production	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Incorporate ATC S-2622-17-4 into the Title V Operating Permit for S-2622.	
6. TYPE OR PRINT NAME OF APPLICANT: <p style="text-align: center;">Bill Davidson</p>	TITLE OF APPLICANT: HES Director
7. SIGNATURE OF APPLICANT: 	DATE: <u>4-8-2016</u>
	PHONE: (661) 763-0081 FAX: (661) 763-5028 EMAIL: billd@trcopco.com

For APCD Use Only:

Enviro Tech

<p>DATE STAMP RECEIVED APR 11 2016 SJVAPCD Southern Region</p>	<p>FILING FEE RECEIVED: \$ <u>20 -</u> CHECK#: <u>4736</u> DATE PAID: <u>4/11/16</u> PROJECT NO: <u>S-116/426</u> FACILITY ID: <u>2622</u></p>
---	--

**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 ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: TRC Operating Company	FACILITY ID: S - 2622
1. Type of Organization: <input type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input checked="" type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: TRC Operating Company	
3. Agent to the Owner: Bill Davidson	

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

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

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

Bill Davidson
 Signature of Responsible Official

4-8-2016
 Date

Bill Davidson

Name of Responsible Official (please print)

HES Director

Title of Responsible Official (please print)

ATTACHMENT D

Previous Title V Operating Permit No.
S-2622-17-3

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-2622-17-3

EXPIRATION DATE: 05/31/2017

SECTION: NE22 **TOWNSHIP:** 29S **RANGE:** 21E

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR C.E. NATCO NATURAL GAS FIRED STEAM GENERATOR (#59 DIS# 22456-79) WITH MAGNA FLAME GLE LOW NOX BURNER AND O2 CONTROLLER (#59 DIS# 22456-79)

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
3. 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. Emissions from this unit shall not exceed any of the following limits: 15 ppmvd NOx @ 3% O2 or 0.018 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 47.5 ppmvd CO @ 3% O2 or 0.035 lb-CO/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
5. Steam generator shall be fired on natural gas and/or TEOR gas from S-2622-7 with a sulfur content of no greater than 1.0 gr-S/100 scf or pre-treated using a sulfa-treat (or equivalent) system for 95% control of SOx emissions. [District Rules 2201, 4320 and 4801] Federally Enforceable Through Title V Permit
6. When complying with sulfur emission limits by fuel analysis, each fuel source shall be tested at startup and annually thereafter for sulfur content. Gas analyses shall be performed using EPA Method 11 or Method 15. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
7. 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
8. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

9. 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
10. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
11. Source testing to measure NO_x and CO emissions from this unit while fired on vapor control/TEOR gas from S-2622-7 shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
12. Source testing to measure natural gas-combustion NO_x and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
13. 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
14. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
15. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
16. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
17. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
18. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
19. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
20. If the unit is fired on noncertified gaseous fuel and compliance with SO_x emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520] Federally Enforceable Through Title V Permit
21. If fuel analysis is used to demonstrate compliance with conditions of this permit, the fuel higher heating value for each fuel shall be certified by a third party fuel supplier or determined by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520; 4305; and 4351] Federally Enforceable Through Title V Permit
22. Permittee shall maintain accurate records of sulfur content of gas combusted in steam generator and shall make such records readily available for District inspection upon request. [District Rules 1070 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
24. 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
25. 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
26. 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 contracts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

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