



MAY 12 2014

Mr. Patrick Gollither  
Taft Production Company  
PO Box 1277  
Taft, CA 93268

**Re: Notice of Minor Title V Permit Modification**  
**District Facility # S-1234**  
**Project # 1142018**

Dear Mr. Gollither:

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 Authorities to Construct S-1234-3-6 and '-26-3 into the Title V operating permit. The project authorized transfer of references to a Venturi Scrubber and its source testing requirements from permit S-1234-26 to permit S-1234-3.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permits, recently issued Authorities to Construct S-1234-3-6 and '-26-3, application, and previous Title V permits. 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-1142018

Engineer: Richard Edgehill  
Date: May 8, 2014

Facility Number: S-1234  
Facility Name: Taft Production Company  
Mailing Address: PO Box 1277  
Taft, CA 93268

*Reviewed by ASUPPARE*

MAY 08 2014

Contact Name: Patrick Gollither  
Phone: (661) 765-7194  
Title: Project Manager  
Lead Engineer: Allan Phillips  
Responsible Official: Patrick Gollither

### I. PROPOSAL

Taft Production Company is proposing a Title V minor permit modification to incorporate the recently issued Authorities to Construct S-1234-3-6 and '-26-3 into the Title V operating permit. The project authorized transfer of references to a Venturi Scrubber and its source testing requirements from permit S-1234-26 to permit S-1234-3.

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 facility is located at 950 Petroleum Club Road in Taft, CA.

### III. EQUIPMENT DESCRIPTION

S-1234-3-6: ROTARY DRYER WITH 25 MMBTU/HR GAS-FIRED BURNER  
ASSEMBLY

S-1234-26-3: CLEANING/MILLING OPERATION #2 INCLUDING TWO BELT  
CONVEYORS, TWO FEED ELEVATORS AND SHARED FABRIC  
COLLECTOR

#### **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**

Please note that conditions on draft PTO S-1234-3-7 were taken from current PTOs S-1234-3-5 and '26-2. Condition matches between draft PTOs and current PTOs are provided below.

Draft PTO S-1234-3-7	Current PTO S- 1234-26-2	Current PTO S-1234-3-5	Comments
1-8		1-8	Draft PTO Condition #5 includes the added words "Rotary Dryer and Venturi Scrubber"  "Dryer #2" changed to "Rotary Dryer"
9			New - Revised Venturi Scrubber #1 emissions factor on draft PTO
10			New - Clarifies that rotary dryer vents only to Venturi Scrubber #1
11	4		
12	5		
13	14		
14	15		
15	16		
16	20		Draft PTO wording revised to delete pulse fabric collector (included on '-26)
17	21		
18	22		
19-30		9-20	

Draft PTO S-1234-26-4	Current PTO S-1234-26-2	Comments
	1	Universal vibrating screen has been removed
1	2	
2	3	
	4, 5	Scrubber conditions moved to '-3
3	6	
4	7	
5	9	
6	10	
7	11	
8	12	
9	13	
	14-16	Scrubber conditions moved to '-3
10	17	
11	18	
12	19	
13-20	20-27	
16-20	23-27	

## 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 Title V PTOs S-1234-3-7 and '-26-4
- B. Authorities to Construct S-1328-3-6 and '-26-3
- C. Permit Application
- D. Current Title V PTO S-1234-3-5 and '-26-2



Taft Production Company  
S-1234, 1142018

# ATTACHMENT A

Proposed Title V PTOs  
S-1234-3-7 and '-26-4



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1234-3-7

**EXPIRATION DATE:** 03/31/2016

**SECTION:** 28 **TOWNSHIP:** 32S **RANGE:** 24E

**EQUIPMENT DESCRIPTION:**

ROTARY DRYER WITH 25 MMBTU/HR GAS-FIRED BURNER ASSEMBLY

## PERMIT UNIT REQUIREMENTS

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1. No modification to this unit for Rule 4309 shall be performed without an Authority to Construct for such modifications, except for changes specified in the conditions below. [District Rules 2010 and 4309] Federally Enforceable Through Title V Permit
2. Upon seven days prior written notice to the District, this unit may be designated as a dormant emissions unit or an active emissions unit. [District Rule 2080] Federally Enforceable Through Title V Permit
3. While dormant, the fuel line shall be physically disconnected from the unit. [District Rule 2080] Federally Enforceable Through Title V Permit
4. While dormant, normal source testing and monitoring shall not be required. [District Rule 2080] Federally Enforceable Through Title V Permit
5. Upon recommencing operation of this unit, normal source testing and monitoring, for the rotary dryer and Venturi Scrubber #1, 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
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]
8. Process weight rate of the rotary dryer shall not exceed 10.5 tons per hour. [District Rule 2201 and District Rule 4202, 4.0] Federally Enforceable Through Title V Permit
9. PM10 emissions from Venturi Scrubber #1 serving rotary dryer shall not exceed 0.039 lb PM10/ton. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The rotary dryer shall only vent to Venturi Scrubber #1. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Scrubber H2O supply shall have operational pressure gauge with pressure differential maintained above 8.5 inches W.C. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Particulate matter (PM10) concentration at scrubber exhaust shall not exceed 0.027 grains/scf. [District Rule 2201 and District Rule 4201, 3.0] Federally Enforceable Through Title V Permit
13. Scrubber pressure differential shall be observed and recorded at least daily during operation of the unit. [District Rule 2520, 9.3.2 and 40 CFR 64] 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.

14. If scrubber pressure differential is not within the proper range, corrective action shall be taken. Corrective action shall include inspecting scrubber and performing any necessary repairs. [District Rules 2520, 9.3.2 and 40 CFR 64] Federally Enforceable Through Title V Permit
15. Records of scrubber pressure differential observations shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.3.2 and 40 CFR 64] Federally Enforceable Through Title V Permit
16. PM10 emissions from Venturi scrubber #1 shall be source tested annually using CARB Method 5, EPA Method 5 (front half), EPA Method 201A in combination with EPA Method 202, or any combination of these methods. Annual source tests shall be conducted at least 6 months after the previous annual source test but not more than 18 months after the previous annual source test. [District Rule 2520, 9.3.2] 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. 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. Only LPG or natural gas purchased from a PUC-regulated utility shall be combusted in the rotary dryer. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Sulfur content of propane shall not exceed 15 grain per 100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Emissions from this permit unit shall not exceed any of the following limits: 3.50 lbm-NOx per hour; 0.075 lbm-VOC per hour; 0.425 lbm-CO per hour. [District NSR Rule and District Rule 4301, 5.2] Federally Enforceable Through Title V Permit
22. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR 64.7. [40 CFR 64] Federally Enforceable Through Title V Permit
23. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR 64.9. [40 CFR 64] Federally Enforceable Through Title V Permit
24. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR 64.8. [40 CFR 64] Federally Enforceable Through Title V Permit
25. The permittee shall maintain accurate records of hourly process weight. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
26. Compliance with permit conditions in the Title V permit shall be deemed compliance with the applicable requirements of District Rule 4202 (as amended 12/17/92). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
27. Compliance with permit conditions in the Title V permit shall be deemed compliance with the applicable requirements of District Rule 4301. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
28. Compliance with permit conditions in the Title V permit shall be deemed compliance with the applicable requirements of District Rule 4801 and Kern County Rule 407. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
29. Operator shall maintain copies of fuel invoices and supplier certifications. [District Rules 1070 and 2201] 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, 2201, and 4309] Federally Enforceable Through Title V Permit

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

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# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1234-26-4

EXPIRATION DATE: 03/31/2016

## EQUIPMENT DESCRIPTION:

CLEANING/MILLING OPERATION #2 INCLUDING TWO BELT CONVEYORS, TWO FEED ELEVATORS AND SHARED FABRIC COLLECTOR

## PERMIT UNIT REQUIREMENTS

1. Feed elevators and enclosed screen shall be ventilated to Ultra reverse pulse fabric collector (shared with S-1234-1, '-2, and '-12). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Unloading spillage shall be minimized to prevent fugitive dust emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Ultra reverse pulse fabric collector (shared with S-1234-1, '-2, and '-12) shall operate whenever process equipment is operated. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Ventilation system serving feed conveying, elevating, screening and milling equipment shall be adjusted and maintained to prevent visible emissions from the ventilated equipment. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Particulate matter (PM10) emissions from this permit unit shall not exceed 5.32 lb per hour. [District NSR Rule and District Rules 4301, 5.2 and 4202, 4.0] Federally Enforceable Through Title V Permit
6. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$  if P is less than or equal to 30 tons per hour, or  $E = 17.31 \times P^{0.16}$  if P is greater than 30 tons per hour. [District Rule 4202, 4.0] Federally Enforceable Through Title V Permit
7. Visible emissions from each dust collector shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day the dust collector is operated. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. Corrective action shall include the following: inspecting the dust collector system for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [District Rules 2520, 9.3.2 and 40 CFR 64] Federally Enforceable Through Title V Permit
8. Dust collection system shall be inspected at least quarterly when the unit is not in operation for any tears, abrasions, or holes in the filters; damage to closed duct systems; or any evidence of particulate matter leaks which might interfere with the PM collection efficiency. Any defective or damaged material shall be repaired or replaced as needed. [District Rule 2520, 9.3.2 and 40 CFR 64] Federally Enforceable Through Title V Permit
9. Records of dust collection system maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.1 and 40 CFR 64] Federally Enforceable Through Title V Permit
10. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR 64.7. [40 CFR 64] Federally Enforceable Through Title V Permit
11. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR 64.9. [40 CFR 64] 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.

12. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR 64.8. [40 CFR 64] Federally Enforceable Through Title V Permit
13. PM10 emissions from Ultra reverse pulse fabric collector shall be source tested annually using CARB Method 5, EPA Method 5 (front half), EPA Method 201A in combination with EPA Method 202, or any combination of these methods. Annual source tests shall be conducted at least 6 months after the previous annual source test but not more than 18 months after the previous annual source test. [District Rule 2520, 9.3.2] 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. 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 permittee shall maintain accurate records of hourly process weight. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
17. {2426} The permittee shall maintain, and make available for District inspection, all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
18. Compliance with permit conditions in the Title V permit shall be deemed compliance with the applicable requirements of District Rule 4202 (as amended 12/17/92). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
19. Compliance with permit conditions in the Title V permit shall be deemed compliance with the applicable requirements of District Rule 4301. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
20. Compliance with permit conditions in the Title V permit shall be deemed compliance with the applicable requirements of District Rule 4801 and Kern County Rule 407. A permit shield is granted from these requirements. [District Rule 2520, 13.2] 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  
S-1328-3-6 and '-26-3



# AUTHORITY TO CONSTRUCT

PERMIT NO: S-1234-3-6

ISSUANCE DATE: 04/08/2014

LEGAL OWNER OR OPERATOR: TAFT PRODUCTION COMPANY  
MAILING ADDRESS: PO BOX 1277  
950 N PETROLEUM CLUB ROAD  
TAFT, CA 93268-1277

LOCATION: 950 N PETROLEUM CLUB ROAD  
TAFT, CA

SECTION: 28 TOWNSHIP: 32S RANGE: 24E

## EQUIPMENT DESCRIPTION:

MODIFICATION OF ROTARY DRYER WITH 25 MMBTU/HR GAS-FIRED BURNER ASSEMBLY: ADD REFERENCES TO VENTURI SCRUBBER INCLUDING SOURCE TESTING FROM '12-26, REVISE PM10 EMISSIONS FACTOR FOR ROTARY DRYER

## CONDITIONS

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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. ATC shall be implemented concurrently with ATC S-1234-26-3. [District Rule 2201] Federally Enforceable Through Title V Permit
3. No modification to this unit for Rule 4309 shall be performed without an Authority to Construct for such modifications, except for changes specified in the conditions below. [District Rules 2010 and 4309] Federally Enforceable Through Title V Permit
4. Upon seven days prior written notice to the District, this unit may be designated as a dormant emissions unit or an active emissions unit. [District Rule 2080] Federally Enforceable Through Title V Permit
5. While dormant, the fuel line shall be physically disconnected from the unit. [District Rule 2080] Federally Enforceable Through Title V Permit
6. While dormant, normal source testing and monitoring shall not be required. [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

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Arnaud Marjollet, Director of Permit Services

S-1234-3-6 May 8 2014 9:01AM - EDGEHILR : Joint Inspection NOT Required

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308 • (661) 392-5500 • Fax (661) 392-5585

7. Upon recommencing operation of this unit, normal source testing and monitoring, for the rotary dryer and Venturi Scrubber #1, shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
8. 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
9. 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]
10. Process weight rate of the rotary dryer shall not exceed 10.5 tons per hour. [District Rule 2201 and District Rule 4202, 4.0] Federally Enforceable Through Title V Permit
11. PM10 emissions from Venturi Scrubber #1 serving rotary dryer shall not exceed 0.039 lb PM10/ton. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The rotary dryer shall only vent to Venturi Scrubber #1. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Scrubber H2O supply shall have operational pressure gauge with pressure differential maintained above 8.5 inches W.C. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Particulate matter (PM10) concentration at scrubber exhaust shall not exceed 0.027 grains/scf. [District Rule 2201 and District Rule 4201, 3.0] Federally Enforceable Through Title V Permit
15. Scrubber pressure differential shall be observed and recorded at least daily during operation of the unit. [District Rule 2520, 9.3.2 and 40 CFR 64] Federally Enforceable Through Title V Permit
16. If scrubber pressure differential is not within the proper range, corrective action shall be taken. Corrective action shall include inspecting scrubber and performing any necessary repairs. [District Rules 2520, 9.3.2 and 40 CFR 64] Federally Enforceable Through Title V Permit
17. Records of scrubber pressure differential observations shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.3.2 and 40 CFR 64] Federally Enforceable Through Title V Permit
18. PM10 emissions from Venturi scrubber #1 shall be source tested annually using CARB Method 5, EPA Method 5 (front half), EPA Method 201A in combination with EPA Method 202, or any combination of these methods. Annual source tests shall be conducted at least 6 months after the previous annual source test but not more than 18 months after the previous annual source test. [District Rule 2520, 9.3.2] 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. 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. Only LPG or natural gas purchased from a PUC-regulated utility shall be combusted in the rotary dryer. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Sulfur content of propane shall not exceed 15 grain per 100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
23. Emissions from this permit unit shall not exceed any of the following limits: 3.50 lbm-NO<sub>x</sub> per hour; 0.075 lbm-VOC per hour; 0.425 lbm-CO per hour. [District NSR Rule and District Rule 4301, 5.2] Federally Enforceable Through Title V Permit
24. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR 64.7. [40 CFR 64] Federally Enforceable Through Title V Permit
25. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR 64.9. [40 CFR 64] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

26. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR 64.8. [40 CFR 64] Federally Enforceable Through Title V Permit
27. The permittee shall maintain accurate records of hourly process weight. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
28. Compliance with permit conditions in the Title V permit shall be deemed compliance with the applicable requirements of District Rule 4202 (as amended 12/17/92). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
29. Compliance with permit conditions in the Title V permit shall be deemed compliance with the applicable requirements of District Rule 4301. 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 applicable requirements of District Rule 4801 and Kern County Rule 407. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
31. Operator shall maintain copies of fuel invoices and supplier certifications. [District Rules 1070 and 2201] 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, 2201, and 4309] Federally Enforceable Through Title V Permit



# AUTHORITY TO CONSTRUCT

PERMIT NO: S-1234-26-3

ISSUANCE DATE: 04/08/2014

LEGAL OWNER OR OPERATOR: TAFT PRODUCTION COMPANY  
MAILING ADDRESS: PO BOX 1277  
950 N PETROLEUM CLUB ROAD  
TAFT, CA 93268-1277

LOCATION: 950 N PETROLEUM CLUB ROAD  
TAFT, CA

## EQUIPMENT DESCRIPTION:

MODIFICATION OF CLEANING/MILLING OPERATION #2 INCLUDING TWO BELT CONVEYORS, TWO FEED ELEVATORS AND SHARED FABRIC COLLECTOR: MOVE REFERENCES TO VENTURI SCRUBBER INCLUDING SOURCE TESTING TO '-3, DELETE VIBRATING SCREEN

## CONDITIONS

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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. ATC shall be implemented concurrently with ATC S-1234-3-6. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Feed elevators and enclosed screen shall be ventilated to Ultra reverse pulse fabric collector (shared with S-1234-1, '-2, and '-12). [District NSR Rule] Federally Enforceable Through Title V Permit
4. Unloading spillage shall be minimized to prevent fugitive dust emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Ultra reverse pulse fabric collector (shared with S-1234-1, '-2, and '-12) shall operate whenever process equipment is operated. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Ventilation system serving feed conveying, elevating, screening and milling equipment shall be adjusted and maintained to prevent visible emissions from the ventilated equipment. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Particulate matter (PM10) emissions from this permit unit shall not exceed 5.32 lb per hour. [District NSR Rule and District Rules 4301, 5.2 and 4202, 4.0] 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

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Arnaud Marjollet, Director of Permit Services

S-1234-26-3 : May 8 2014 9:01AM -- EDGEHILR : Joint Inspection NOT Required

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308 • (661) 392-5500 • Fax (661) 392-5585

8. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$  if P is less than or equal to 30 tons per hour, or  $E = 17.31 \times P^{0.16}$  if P is greater than 30 tons per hour. [District Rule 4202, 4.0] Federally Enforceable Through Title V Permit
9. Visible emissions from each dust collector shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day the dust collector is operated. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. Corrective action shall include the following: inspecting the dust collector system for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [District Rules 2520, 9.3.2 and 40 CFR 64] Federally Enforceable Through Title V Permit
10. Dust collection system shall be inspected at least quarterly when the unit is not in operation for any tears, abrasions, or holes in the filters; damage to closed duct systems; or any evidence of particulate matter leaks which might interfere with the PM collection efficiency. Any defective or damaged material shall be repaired or replaced as needed. [District Rule 2520, 9.3.2 and 40 CFR 64] Federally Enforceable Through Title V Permit
11. Records of dust collection system maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.1 and 40 CFR 64] Federally Enforceable Through Title V Permit
12. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR 64.7. [40 CFR 64] Federally Enforceable Through Title V Permit
13. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR 64.9. [40 CFR 64] Federally Enforceable Through Title V Permit
14. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR 64.8. [40 CFR 64] Federally Enforceable Through Title V Permit
15. PM10 emissions from Ultra reverse pulse fabric collector shall be source tested annually using CARB Method 5, EPA Method 5 (front half), EPA Method 201A in combination with EPA Method 202, or any combination of these methods. Annual source tests shall be conducted at least 6 months after the previous annual source test but not more than 18 months after the previous annual source test. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. 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
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 permittee shall maintain accurate records of hourly process weight. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
19. The permittee shall maintain, and make available for District inspection, all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
20. Compliance with permit conditions in the Title V permit shall be deemed compliance with the applicable requirements of District Rule 4202 (as amended 12/17/92). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
21. Compliance with permit conditions in the Title V permit shall be deemed compliance with the applicable requirements of District Rule 4301. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
22. Compliance with permit conditions in the Title V permit shall be deemed compliance with the applicable requirements of District Rule 4801 and Kern County Rule 407. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

# ATTACHMENT C

## Permit Application



# ATTACHMENT D

Current PTOs S-1234-3-5 and '-26-2



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1234-3-5

**EXPIRATION DATE:** 03/31/2016

**SECTION:** 28 **TOWNSHIP:** 32S **RANGE:** 24E

**EQUIPMENT DESCRIPTION:**

ROTARY DRYER WITH 25 MMBTU/HR GAS-FIRED BURNER ASSEMBLY

## PERMIT UNIT REQUIREMENTS

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1. No modification to this unit shall be performed without an Authority to Construct for such modifications, except for changes specified in the conditions below. [District Rule 2010] Federally Enforceable Through Title V Permit
2. Upon seven days prior written notice to the District, this unit may be designated as a dormant emissions unit or an active emissions unit. [District Rule 2080] Federally Enforceable Through Title V Permit
3. While dormant, the fuel line shall be physically disconnected from the unit. [District Rule 2080] Federally Enforceable Through Title V Permit
4. While dormant, normal source testing and monitoring shall not be required. [District Rule 2080] Federally Enforceable Through Title V Permit
5. Upon recommencing operation of this unit, normal source testing and monitoring 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
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. Process weight rate of dryer #2 shall not exceed 10.5 tons per hour. [District NSR Rule and District Rule 4202, 4.0] Federally Enforceable Through Title V Permit
9. Only LPG or natural gas purchased from a PUC-regulated utility shall be combusted in dryer #2. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Sulfur content of propane shall not exceed 15 grain per 100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Emissions from this permit unit shall not exceed any of the following limits: 3.50 lbm-NO<sub>x</sub> per hour; 0.075 lbm-VOC per hour; 0.425 lbm-CO per hour. [District NSR Rule and District Rule 4301, 5.2] Federally Enforceable Through Title V Permit
12. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR 64.7. [40 CFR 64] Federally Enforceable Through Title V Permit
13. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR 64.9. [40 CFR 64] 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.

14. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR 64.8. [40 CFR 64] Federally Enforceable Through Title V Permit
15. The permittee shall maintain accurate records of hourly process weight. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
16. Compliance with permit conditions in the Title V permit shall be deemed compliance with the applicable requirements of District Rule 4202 (as amended 12/17/92). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
17. Compliance with permit conditions in the Title V permit shall be deemed compliance with the applicable requirements of District Rule 4301. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
18. Compliance with permit conditions in the Title V permit shall be deemed compliance with the applicable requirements of District Rule 4801 and Kern County Rule 407. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
19. Operator shall maintain copies of fuel invoices and supplier certifications. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
20. 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

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

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1234-26-2

EXPIRATION DATE: 03/31/2016

## EQUIPMENT DESCRIPTION:

CLEANING/MILLING OPERATION #2 INCLUDING TWO BELT CONVEYORS, TWO FEED ELEVATORS AND SHARED FABRIC COLLECTOR

## PERMIT UNIT REQUIREMENTS

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1. Universal vibrating screen shall vent to venturi scrubber #1. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Feed elevators and enclosed screen shall be ventilated to Ultra reverse pulse fabric collector (shared with S-1234-1, '-2, and '-12). [District NSR Rule] Federally Enforceable Through Title V Permit
3. Unloading spillage shall be minimized to prevent fugitive dust emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Scrubber H2O supply shall have operational pressure gauge with pressure differential maintained above 8.5 inches W.C. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Particulate matter concentration at scrubber exhaust shall not exceed 0.027 grains/scf. [District NSR Rule and District Rule 4201, 3.0] Federally Enforceable Through Title V Permit
6. Ultra reverse pulse fabric collector (shared with S-1234-1, '-2, and '-12) shall operate whenever process equipment is operated. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Ventilation system serving feed conveying, elevating, screening and milling equipment shall be adjusted and maintained to prevent visible emissions from the ventilated equipment. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Fines from screen shall be conveyed via closed system only to fines silo listed on PTO #S-1234-1. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Particulate matter (PM10) emissions from this permit unit shall not exceed 5.32 lb per hour. [District NSR Rule and District Rules 4301, 5.2 and 4202, 4.0] Federally Enforceable Through Title V Permit
10. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation  $E = 3.59 \times P^{0.62}$  if P is less than or equal to 30 tons per hour, or  $E = 17.31 \times P^{0.16}$  if P is greater than 30 tons per hour. [District Rule 4202, 4.0] Federally Enforceable Through Title V Permit
11. Visible emissions from each dust collector shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day the dust collector is operated. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. Corrective action shall include the following: inspecting the dust collector system for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [District Rules 2520, 9.3.2 and 40 CFR 64] Federally Enforceable Through Title V Permit
12. Dust collection system shall be inspected at least quarterly when the unit is not in operation for any tears, abrasions, or holes in the filters; damage to closed duct systems; or any evidence of particulate matter leaks which might interfere with the PM collection efficiency. Any defective or damaged material shall be repaired or replaced as needed. [District Rule 2520, 9.3.2 and 40 CFR 64] 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.

13. Records of dust collection system maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.1 and 40 CFR 64] Federally Enforceable Through Title V Permit
14. Scrubber pressure differential shall be observed and recorded at least daily during operation of the unit. [District Rule 2520, 9.3.2 and 40 CFR 64] Federally Enforceable Through Title V Permit
15. If scrubber pressure differential is not within the proper range, corrective action shall be taken. Corrective action shall include inspecting scrubber and performing any necessary repairs. [District Rules 2520, 9.3.2 and 40 CFR 64] Federally Enforceable Through Title V Permit
16. Records of scrubber pressure differential observations shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.3.2 and 40 CFR 64] Federally Enforceable Through Title V Permit
17. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR 64.7. [40 CFR 64] Federally Enforceable Through Title V Permit
18. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR 64.9. [40 CFR 64] Federally Enforceable Through Title V Permit
19. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR 64.8. [40 CFR 64] Federally Enforceable Through Title V Permit
20. PM10 emissions from Ultra reverse pulse fabric collector and venturi scrubber #1 shall be source tested annually using CARB Method 5, EPA Method 5 (front half), EPA Method 201A in combination with EPA Method 202, or any combination of these methods. Annual source tests shall be conducted at least 6 months after the previous annual source test but not more than 18 months after the previous annual source test. [District Rule 2520, 9.3.2] 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. 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
23. The permittee shall maintain accurate records of hourly process weight. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
24. The permittee shall maintain, and make available for District inspection, all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
25. Compliance with permit conditions in the Title V permit shall be deemed compliance with the applicable requirements of District Rule 4202 (as amended 12/17/92). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
26. Compliance with permit conditions in the Title V permit shall be deemed compliance with the applicable requirements of District Rule 4301. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
27. Compliance with permit conditions in the Title V permit shall be deemed compliance with the applicable requirements of District Rule 4801 and Kern County Rule 407. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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