

FEB 13 2012

Gerardo C. Rios, Chief
Permits Office
Air Division
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

Re: **Notice of Minor Title V Permit Modification**
District Facility # S-1547
Project # S-1112347

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Aera Energy LLC is proposing a Title V minor permit modification to incorporate the recently issued ATC #s: S-1547-1148-1, '-1149-1, '-1150-1 and '-1151-1 into the Title V operating permit. The project is to lower the NOx emissions limit to 7 ppm @ 3% O₂.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued ATC #s: S-1547-1148-1, '-1149-1, '-1150-1 and '-1151-1, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura at (661) 392-5500.

Sincerely,



David Warner
Director of Permit Services

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

Central Region (Main Office)
1990 E. Gettysburg Avenue
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Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

FEB 13 2012

Brent Winn
Aera Energy LLC
P.O. Box 11164
Bakersfield, CA 93389

**Re: Notice of Minor Title V Permit Modification
District Facility # S-1547
Project # S-1112347**

Dear Mr. Winn:

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 ATC #s: S-1547-1148-1, '-1149-1, '-1150-1 and '-1151-1 into the Title V operating permit. The project is to lower the NOx emissions limit to 7 ppm @ 3% O₂.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued ATC #s: S-1547-1148-1, '-1149-1, '-1150-1 and '-1151-1, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura at (661) 392-5500.

Sincerely,



David Warner
Director of Permit Services

Enclosures

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TITLE V APPLICATION REVIEW

Minor Modification
Project #: S-1112347

Date: 2/09/2012
Engineer Dolores Gough
Lead Engineer Allan Phillips *AP SUPER AQE*

Facility Number: S-1547
Facility Name: Aera Energy, LLC
Mailing Address: P.O. Box 11164
Bakersfield, CA 93389-1164

FEB 09 2012

Contact Name: Brent Winn
Phone: 661-665-4363

Responsible Official: R.B. Rust
Title: Process Supervisor

I. PROPOSAL

Aera Energy LLC (Aera) is proposing a Title V minor permit modification to incorporate the recently issued Authorities to Construct (ATC) S-1547-1148-1, '-1149-1, '-1150-1 and '-1151-1 into their Title V operating permit. These ATCs authorized enhancing combustion controls and alternatively replace existing burners to achieve 7 ppmv NO_x @ 3% O₂. The units will be fired solely on natural gas.

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 steam generators will be located at various specified locations within Aera's Heavy Oil Western stationary source.

III. EQUIPMENT DESCRIPTION

S-1547-1148-2: 85.0 MMBTU/HR NATURAL GAS FIRED STEAM GENERATOR (SG100G) WITH NORTH AMERICAN 4231-85-

GLE BURNER AND FGR APPROVED TO OPERATE AT
VARIOUS SPECIFIED LOCATIONS

S-1547-1149-2: 85.0 MMBTU/HR NATURAL GAS FIRED STEAM
GENERATOR (SG100H) WITH NORTH AMERICAN 4231-85-
GLE BURNER AND FGR APPROVED TO OPERATE AT
VARIOUS SPECIFIED LOCATIONS

S-1547-1150-2: 85.0 MMBTU/HR NATURAL GAS FIRED STEAM GENERATOR
(SG100I) WITH NORTH AMERICAN 4231-85-GLE BURNER
AND FGR APPROVED TO OPERATE AT VARIOUS
SPECIFIED LOCATIONS

S-1547-1150-2: 85.0 MMBTU/HR NATURAL GAS FIRED STEAM GENERATOR
(SG100J) WITH NORTH AMERICAN 4231-85-GLE BURNER
AND FGR APPROVED TO OPERATE AT VARIOUS
SPECIFIED LOCATIONS

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

Aera has proposed to lower the NO_x limit to 7 ppm @ 3% O₂ by either tuning or replacing each of the existing burners ^{with} to an ultra low NO_x burner and enhancing combustion controls (PLC control). The modifications will not increase the heat input capacity or permitted emissions of the steam generators.

Proposed PTOs vs ATCs:

Condition #1 on all the subject ATCs was removed as this condition required submittal of an application to modify the Title V permit, which has already been satisfied with this permit action.

Conditions #6 and 7 on all the subject ATCs were updated/combined and included as Condition 5 on the proposed PTO.

Condition #22 on all the subject ATCs regarding a general condition on source testing is removed as it is already included in the facility-wide permit.

Proposed PTOs vs current PTOs:

Permit Unit	Current PTO Condition #:	Proposed PTO Condition #:	Action	Description of Change
'-1148	8	8	Revision	Updated NOx emission rate
		13	Revision	Updated monitoring
		18	New	Condition based on the ATC
<hr/>				
'-1149 & '-1150	6 & 8	6 & 8	Revision	Updated NOx emission rates
	13	13	Revision	Updated monitoring
'-1151	5 & 6	5	Revision	General condition on startup and shutdown were updated and included as Condition 5.
	7 & 9	6 & 8	Revision	Updated NOx emissions limit
	16, 18	14, 16	Revision	Updated monitoring
	19 to 25	--	--	FGR monitoring removed based on ATC

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-1547-1148-2, '-1149-2, '-1150-2 and -1151-2
- B. Authorities to Construct No. S-1547-1148-1, '-1149-1, '-1150-1 and -1151-1
- C. Previous Title V Operating Permit No. S-1547-1148-3, '-1149-3, '-1150-3 and '-1151-0
- D. Permit Application

ATTACHMENT A

Proposed Modified Title V Operating Permit No.
(S-1547-1148-2, -1149-2, -1150-2 and -1151-2)

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-1148-2

EXPIRATION DATE: 05/31/2016

EQUIPMENT DESCRIPTION:

85.0 MMBTU/HR NATURAL GAS FIRED STEAM GENERATOR (SG100G) WITH NORTH AMERICAN 4231-85-GLE BURNER AND FGR APPROVED TO OPERATE AT VARIOUS SPECIFIED LOCATIONS

PERMIT UNIT REQUIREMENTS

1. This unit is approved for operation at the following locations: NE/4 Section 33, T28S, R21E; SE/4 Section 33, T28S, R21E and SE/4 Section 28, T28S, R21E. [District Rule 4102]
2. Permittee shall notify the District Compliance Division of each location at which the unit is located in excess of 24 hours. Such notification shall be made no later than 48 hours after starting operation at the location. [District Rule 1070]
3. Flue gas recirculation (FGR) shall be utilized in conjunction with low-NOx burner to maintain ongoing compliance with permitted emission limits unless source testing documents compliance without utilizing the flue gas recirculation. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Natural gas fuel sulfur content shall not exceed 0.75 grains S/100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Duration of startup and shutdown (as defined in Rule 4320) shall not exceed 2 hours each per occurrence. Refractory curing period is defined as a maintenance-based reduced-load period of time during which a unit is brought from a shutdown status to staged rates of firing for the sole purpose of curing new refractory lining of the unit, and shall not exceed 30 hours per occurrence. The operator shall maintain records of the duration of start-up, shutdown, and refractory curing periods. [District Rule 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
6. Emission rates, except during startup, shutdown, and refractory curing, shall not exceed any of the following: PM10: 0.0076 lb/MMBtu, VOC: 0.0055 lb/MMBtu, NOx (as NO2): 7 ppmv @ 3% O2, or CO: 25 ppmv @ 3% O2. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
7. Emission rates during startup, shutdown and refractory curing shall not exceed: particulate matter - 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO2; sulfur - 200 pounds of SO2 per hour, or 2000 ppmv as SO2, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO2 - 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4301, 5.2; 4405, 4406 and 4801] Federally Enforceable Through Title V Permit
8. Emission rates shall not exceed any of the following: PM10: 15.5 lb/day, SOx (as SO2): 4.4 lb/day, VOC: 11.2 lb/day, NOx (as NO2): 17.3 lb/day or CO: 37.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Annual quantity of natural gas fuel burned in this steam generator shall not exceed 730 MMscf/year. [District Rule 2201] Federally Enforceable Through Title V Permit
10. 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 3246, D 4084, D 4468, D 6667 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory. [District Rules 1070, 2201 and 2520] 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.

11. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 1070, 2201 and 2520] Federally Enforceable Through Title V Permit
12. 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, 9.4.2; 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
13. If periodic monitoring of NO_x, CO, and O₂ concentrations is utilized, 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. Measurement shall be made with the FGR system in the mode of operation (closed or open) in which it was used in the preceding 30 days. 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 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 the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
15. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
16. 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, 5.4; 4306, 5.4 and 4320, 5.7] Federally Enforceable Through Title V Permit
17. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise specified in the Permit to Operate no determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. For the purposes of permittee-performed alternate monitoring, emissions measurements may be performed at any time after the unit reaches conditions representative of normal operation. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
18. Whenever the unit is switched to operate with the flue gas recirculation (FGR) system in the closed position, compliance source testing for NO_x and CO shall be conducted within 60 days of cessation of FGR operation date unless source testing with FGR in closed position has occurred within the previous 12 months. [District Rule 1070] 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.

19. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
20. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months, (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months, (no more than 30 days before or after the required 36 months source test date). 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
21. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
22. 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. 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 following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SOx (lb/MMBtu) - ARB Method 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D3246, D4084, D4468, D6667 or double GC for H2S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 1081, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
24. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
25. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520] Federally Enforceable Through Title V Permit
26. Copies of all fuel invoices showing quantity of supplier-certified gas delivered and copies of quality terms of supplier-certified gas delivery contracts shall be maintained. The operator shall record daily and annual amount, and types, of fuels combusted and all dates on which unit is fired on any non-certified fuel and record specific type of non-certified fuel used. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
27. Permittee shall maintain records of duration of each start-up, shutdown and refractory curing, for a period of five years and make such records available for District inspection upon request. [District Rules 2080, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
28. All records shall be maintained 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

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-1547-1149-2

EXPIRATION DATE: 05/31/2016

EQUIPMENT DESCRIPTION:

85.0 MMBTU/HR NATURAL GAS FIRED STEAM GENERATOR (SG100H) WITH NORTH AMERICAN 4231-85-GLE BURNER AND FGR APPROVED TO OPERATE AT VARIOUS SPECIFIED LOCATIONS

PERMIT UNIT REQUIREMENTS

1. This unit is approved for operation at the following locations: NE/4 Section 33, T28S, R21E; SE/4 Section 33, T28S, R21E and SE/4 Section 28, T28S, R21E. [District Rule 4102]
2. Permittee shall notify the District Compliance Division of each location at which the unit is located in excess of 24 hours. Such notification shall be made no later than 48 hours after starting operation at the location. [District Rule 1070]
3. Flue gas recirculation (FGR) shall be utilized in conjunction with low-NOx burner to maintain ongoing compliance with permitted emission limits unless source testing documents compliance without utilizing the flue gas recirculation. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Natural gas fuel sulfur content shall not exceed 0.75 grains S/100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Duration of startup and shutdown (as defined in Rule 4320) shall not exceed 2 hours each per occurrence. Refractory curing period is defined as a maintenance-based reduced-load period of time during which a unit is brought from a shutdown status to staged rates of firing for the sole purpose of curing new refractory lining of the unit, and shall not exceed 30 hours per occurrence. The operator shall maintain records of the duration of start-up, shutdown, and refractory curing periods. [District Rule 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
6. Emission rates, except during startup, shutdown, and refractory curing, shall not exceed any of the following: PM10: 0.0076 lb/MMBtu, VOC: 0.0055 lb/MMBtu, NOx (as NO2): 7 ppmv @ 3% O2, or CO: 25 ppmv @ 3% O2. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
7. Emission rates during startup, shutdown and refractory curing shall not exceed: particulate matter - 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO2; sulfur - 200 pounds of SO2 per hour, or 2000 ppmv as SO2, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO2 - 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4101, 4102, 4301, 4405, 4406 and 4801] Federally Enforceable Through Title V Permit
8. Emission rates shall not exceed any of the following: PM10: 15.5 lb/day, SOx (as SO2): 4.4 lb/day, VOC: 11.2 lb/day, NOx (as NO2): 17.3 lb/day or CO: 37.7 lb/day. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
9. Annual quantity of natural gas fuel burned in this steam generator shall not exceed 730 MMscf/year. [District Rule 2201] Federally Enforceable Through Title V Permit
10. 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 3246, D 4084, D 4468, D 6667 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory. [District Rules 1070, 2201 and 2520, 9.4.2] 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.

11. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 1070, 2201, 2520, 9.4.2 and 4320] Federally Enforceable Through Title V Permit
12. 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 Rules 1070, 2520, 9.4.2; 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
13. If periodic monitoring of NO_x, CO, and O₂ concentrations is utilized, 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. Measurement shall be made with the FGR system in the mode of operation (closed or open) in which it was used in the preceding 30 days. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 2520, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
14. If 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 the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
15. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
16. 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. All emissions measurements shall be made with the unit operating either at conditions representative of all operating modes, firing rates, and flue gas recirculation rates. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. For the purpose of permittee-performed alternate monitoring, emissions measurements may be performed at any time after the unit reaches conditions representative of normal operation. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
18. Whenever the unit is switched to operate with the flue gas recirculation (FGR) system in the closed position, compliance source testing for NO_x and CO shall be conducted within 60 days of cessation of FGR operation date unless source testing with FGR in closed position has occurred within the previous 12 months. [District Rule 1070] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

19. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
20. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months (no more than 30 days before or after the required 36-month source test date). 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
21. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
22. 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. 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 following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SOx (lb/MMBtu) - ARB Method 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D3246, D4084, D4468, D6667 or double GC for H2S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 1081, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
24. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
25. {520} The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit
26. Copies of all fuel invoices showing quantity of supplier-certified gas delivered and copies of quality terms of supplier-certified gas delivery contracts shall be maintained. The operator shall record daily and annual amount, and types, of fuels combusted and all dates on which unit is fired on any non-certified fuel and record specific type of non-certified fuel used. [District Rules 2201 and 2520, 9.5.2] Federally Enforceable Through Title V Permit
27. Permittee shall maintain records of duration of each start-up and shutdown, and refractory curing, for a period of five years and make such records readily available for District inspection upon request. [District Rule 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
28. All records shall be maintained 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

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-1547-1150-2

EXPIRATION DATE: 05/31/2016

EQUIPMENT DESCRIPTION:

85.0 MMBTU/HR NATURAL GAS FIRED STEAM GENERATOR (SG100I) WITH NORTH AMERICAN 4231-85-GLE BURNER AND FGR APPROVED TO OPERATE AT VARIOUS SPECIFIED LOCATIONS

PERMIT UNIT REQUIREMENTS

1. This unit is approved for operation at the following locations: NE/4 Section 33, T28S, R21E; SE/4 Section 33, T28S, R21E and SE/4 Section 28, T28S, R21E. [District Rule 4102]
2. Permittee shall notify the District Compliance Division of each location at which the unit is located in excess of 24 hours. Such notification shall be made no later than 48 hours after starting operation at the location. [District Rule 1070]
3. Flue gas recirculation (FGR) shall be utilized in conjunction with low-NOx burner to maintain ongoing compliance with permitted emission limits unless source testing documents compliance without utilizing the flue gas recirculation. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Natural gas fuel sulfur content shall not exceed 0.75 grains S/100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Duration of startup and shutdown (as defined in Rule 4320) shall not exceed 2 hours each per occurrence. Refractory curing period is defined as a maintenance-based reduced-load period of time during which a unit is brought from a shutdown status to staged rates of firing for the sole purpose of curing new refractory lining of the unit, and shall not exceed 30 hours per occurrence. The operator shall maintain records of the duration of start-up, shutdown, and refractory curing periods. [District Rule 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
6. Emission rates, except during startup, shutdown, and refractory curing, shall not exceed any of the following: PM10: 0.0076 lb/MMBtu, VOC: 0.0055 lb/MMBtu, NOx (as NO2): 7 ppmv @ 3% O2, or CO: 25 ppmv @ 3% O2. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
7. Emission rates during startup, shutdown and refractory curing shall not exceed: particulate matter - 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO2; sulfur - 200 pounds of SO2 per hour, or 2000 ppmv as SO2, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO2 - 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4101, 4102, 4301, 4405, 4406 and 4801] Federally Enforceable Through Title V Permit
8. Emission rates shall not exceed any of the following: PM10: 15.5 lb/day, SOx (as SO2): 4.4 lb/day, VOC: 11.2 lb/day, NOx (as NO2): 17.3 lb/day or CO: 37.7 lb/day. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
9. Annual quantity of natural gas fuel burned in this steam generator shall not exceed 730 MMscf/year. [District Rule 2201] Federally Enforceable Through Title V Permit
10. 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 3246, D 4084, D 4468, D 6667 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory. [District Rules 1070, 2201 and 2520, 9.4.2] 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: AERA ENERGY LLC

Location: HEAVY OIL WESTERN STATIONARY SOURCE, KERN COUNTY, CA

S-1547-1150-2 : Feb 9 2012 2:09PM -- GOUGHD

11. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 1070, 2201, 2520, 9.4.2 and 4320] Federally Enforceable Through Title V Permit
12. 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 Rules 1070, 2520, 9.4.2; 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
13. If periodic monitoring of NO_x, CO, and O₂ concentrations is utilized, 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. Measurement shall be made with the FGR system in the mode of operation (closed or open) in which it was used in the preceding 30 days. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 2520, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
14. If 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 the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
15. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
16. 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. All emissions measurements shall be made with the unit operating either at conditions representative of all operating modes, firing rates, and flue gas recirculation rates. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. For the purpose of permittee-performed alternate monitoring, emissions measurements may be performed at any time after the unit reaches conditions representative of normal operation. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
18. Whenever the unit is switched to operate with the flue gas recirculation (FGR) system in the closed position, compliance source testing for NO_x and CO shall be conducted within 60 days of cessation of FGR operation date unless source testing with FGR in closed position has occurred within the previous 12 months. [District Rule 1070] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

19. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
20. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months (no more than 30 days before or after the required 36-month source test date). 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
21. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
22. 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. 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 following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SOx (lb/MMBtu) - ARB Method 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D3246, D4084, D4468, D6667 or double GC for H2S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 1081, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
24. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
25. {520} The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit
26. Copies of all fuel invoices showing quantity of supplier-certified gas delivered and copies of quality terms of supplier-certified gas delivery contracts shall be maintained. The operator shall record daily and annual amount, and types, of fuels combusted and all dates on which unit is fired on any non-certified fuel and record specific type of non-certified fuel used. [District Rules 2201 and 2520, 9.5.2] Federally Enforceable Through Title V Permit
27. Permittee shall maintain records of duration of each start-up and shutdown, and refractory curing, for a period of five years and make such records readily available for District inspection upon request. [District Rule 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
28. All records shall be maintained 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

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-1151-2

EXPIRATION DATE: 05/31/2016

EQUIPMENT DESCRIPTION:

85.0 MMBTU/HR NATURAL GAS FIRED STEAM GENERATOR (SG100J) WITH NORTH AMERICAN 4231-85-GLE BURNER AND FGR APPROVED TO OPERATE AT VARIOUS SPECIFIED LOCATIONS

PERMIT UNIT REQUIREMENTS

1. This unit is approved for operation at the following locations: NE/4 Section 33, T28S, R21E; SE/4 Section 33, T28S, R21E and SE/4 Section 28, T28S, R21E. [District Rule 4102]
2. Permittee shall notify the District Compliance Division of each location at which the unit is located in excess of 24 hours. Such notification shall be made no later than 48 hours after starting operation at the location. [District Rule 1070]
3. Flue gas recirculation (FGR) shall be utilized in conjunction with low-NOx burner to maintain ongoing compliance with permitted emission limits unless source testing documents compliance without utilizing the flue gas recirculation. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Natural gas fuel sulfur content shall not exceed 0.75 grains S/100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Duration of startup and shutdown (as defined in Rule 4320) shall not exceed 2 hours each per occurrence. Refractory curing period is defined as a maintenance-based reduced-load period of time during which a unit is brought from a shutdown status to staged rates of firing for the sole purpose of curing new refractory lining of the unit, and shall not exceed 30 hours per occurrence. The operator shall maintain records of the duration of start-up, shutdown, and refractory curing periods. [District Rule 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
6. Emission rates, except during startup, shutdown, and refractory curing, shall not exceed any of the following: PM10: 0.0076 lb/MMBtu, VOC: 0.0055 lb/MMBtu, NOx (as NO2): 7 ppmv @ 3% O2, or CO: 25 ppmv @ 3% O2. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
7. Emission rates during startup, shutdown and refractory curing shall not exceed: particulate matter - 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO2; sulfur - 200 pounds of SO2 per hour, or 2000 ppmv as SO2, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO2 - 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4101, 4102, 4301, 4405, 4406 and 4801] Federally Enforceable Through Title V Permit
8. Emission rates shall not exceed any of the following: PM10: 15.5 lb/day, SOx (as SO2): 4.4 lb/day, VOC: 11.2 lb/day, NOx (as NO2): 17.3 lb/day or CO: 37.7 lb/day. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
9. Annual quantity of natural gas fuel burned in this steam generator shall not exceed 730 MMscf/year. [District Rule 2201] Federally Enforceable Through Title V Permit
10. 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 3246, D 4084, D 4468, D 6667 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory. [District Rules 1070, 2201 and 2520, 9.4.2] 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.

11. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 1070, 2201, 2520, 9.4.2 and 4320] Federally Enforceable Through Title V Permit
12. 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 Rules 1070, 2520, 9.4.2; 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
13. If periodic monitoring of NO_x, CO, and O₂ concentrations is utilized, 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. Measurement shall be made with the FGR system in the mode of operation (closed or open) in which it was used in the preceding 30 days. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 2520, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
14. If 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 the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
15. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
16. 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. All emissions measurements shall be made with the unit operating either at conditions representative of all operating modes, firing rates, and flue gas recirculation rates. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. For the purpose of permittee-performed alternate monitoring, emissions measurements may be performed at any time after the unit reaches conditions representative of normal operation. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
18. Whenever the unit is switched to operate with the flue gas recirculation (FGR) system in the closed position, compliance source testing for NO_x and CO shall be conducted within 60 days of cessation of FGR operation date unless source testing with FGR in closed position has occurred within the previous 12 months. [District Rule 1070] 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.

19. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
20. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months (no more than 30 days before or after the required 36-month source test date). 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
21. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
22. 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. 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 following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SOx (lb/MMBtu) - ARB Method 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D3246, D4084, D4468, D6667 or double GC for H2S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 1081, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
24. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
25. {520} The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit
26. Copies of all fuel invoices showing quantity of supplier-certified gas delivered and copies of quality terms of supplier-certified gas delivery contracts shall be maintained. The operator shall record daily and annual amount, and types, of fuels combusted and all dates on which unit is fired on any non-certified fuel and record specific type of non-certified fuel used. [District Rules 2201 and 2520, 9.5.2] Federally Enforceable Through Title V Permit
27. Permittee shall maintain records of duration of each start-up and shutdown, and refractory curing, for a period of five years and make such records readily available for District inspection upon request. [District Rule 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
28. All records shall be maintained 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

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

ATTACHMENT B

Authorities to Construct No.
(S-1547-1148-1, -1149-1, -1150-1 and -1151-1)

AUTHORITY TO CONSTRUCT

PERMIT NO: S-1547-1148-1

ISSUANCE DATE: 04/12/2011

LEGAL OWNER OR OPERATOR: AERA ENERGY LLC
MAILING ADDRESS: PO BOX 11164
BAKERSFIELD, CA 93389-1164

LOCATION: HEAVY OIL WESTERN STATIONARY SOURCE
KERN COUNTY, CA

EQUIPMENT DESCRIPTION:

MODIFICATION OF 85.0 MMBTU/HR NATURAL GAS FIRED STEAM GENERATOR (SG100G) WITH NORTH AMERICAN 4231-85-GLE BURNER, OR DISTRICT APPROVED EQUIVALENT, AND FGR APPROVED TO OPERATE AT VARIOUS SPECIFIED LOCATIONS. : LOWER NOX TO 7 PPMV, ENHANCE COMBUSTION CONTROLS AND ALTERNATIVELY REPLACE EXISTING BURNER WITH COEN MODEL QLN-ULN ULTRA LOW NOX BURNER, OR NORTH AMERICAN MODEL MAGNA FLAME LEX ULTRA LOW NOX BURNER, OR ACT GIDEON ULTRA LOW NOX BURNER, OR EQUIVALENT TO ACHIEVE 7 PPMV NOX

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. This unit is approved for operation at the following locations: NE/4 Section 33, T28S, R21E; SE/4 Section 33, T28S, R21E and SE/4 Section 28, T28S, R21E. [District Rule 4102]
3. Permittee shall notify the District Compliance Division of each location at which the unit is located in excess of 24 hours. Such notification shall be made no later than 48 hours after starting operation at the location. [District Rule 1070]
4. Flue gas recirculation (FGR) shall be utilized in conjunction with low-NOx burner to maintain ongoing compliance with permitted emission limits unless source testing pursuant to conditions 30, 34, 36, 37, 38 and 39 documents compliance without utilizing the flue gas recirculation. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Natural gas fuel sulfur content shall not exceed 0.75 grains S/100 scf. [District Rule 2201] 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

DAVID WARNER, Director of Permit Services

S-1547-1148-1 Nov 3 2011 1:05PM - GOUGHD - Joint Inspection NOT Required

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

6. Duration of start-up and shutdown shall not exceed 2 hours each per occurrence. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
7. Duration of refractory curing shall not exceed 30 hours per each occurrence. Permittee shall notify the District in writing prior to refractory curing. [District Rule 2080] Federally Enforceable Through Title V Permit
8. Emission rates, except during startup, shutdown, and refractory curing, shall not exceed any of the following: PM10: 0.0076 lb/MMBtu, VOC: 0.0055 lb/MMBtu, NOx (as NO2): 7 ppmv @ 3% O2, or CO: 25 ppmv @ 3% O2. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
9. Emission rates during startup, shutdown and refractory curing shall not exceed: particulate matter - 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO2; sulfur - 200 pounds of SO2 per hour, or 2000 ppmv as SO2, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO2 - 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4101, 4102, 4301, 4405, 4406 and 4801] Federally Enforceable Through Title V Permit
10. Emission rates shall not exceed any of the following: PM10: 15.5 lb/day, SOx (as SO2): 4.4 lb/day, VOC: 11.2 lb/day, NOx (as NO2): 17.3 lb/day or CO: 37.7 lb/day. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
11. Annual quantity of natural gas fuel burned in this steam generator shall not exceed 730 MMscf/year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3246, D 4084, D 4468, D 6667 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory. [District Rules 1070, 2201 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
13. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 1070, 2201, 2520, 9.4.2 and 4320] Federally Enforceable Through Title V Permit
14. 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 Rules 1070, 2520, 9.4.2; 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
15. If periodic monitoring of NOx, CO, and O2 concentrations is utilized, 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. Measurement shall be made with the FGR system in the mode of operation (closed or open) in which it was used in the preceding 30 days. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 2520, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
16. If NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

17. 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
18. 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
19. All emissions measurements shall be made with the unit operating either at conditions representative of all operating modes, firing rates, and flue gas recirculation rates. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. For the purpose of permittee-performed alternate monitoring, emissions measurements may be performed at any time after the unit reaches conditions representative of normal operation. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- X 20. Whenever the unit is switched to operate with the flue gas recirculation (FGR) system in the closed position, compliance source testing for NO_x and CO shall be conducted within 60 days of cessation of FGR operation date unless source testing with FGR in closed position has occurred within the previous 12 months. [District Rule 1070] Federally Enforceable Through Title V Permit
21. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
- X 22. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Last Amended December 16, 1993). [District Rule 1081, and County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 110 (Madera)] Federally Enforceable Through Title V Permit
23. 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 (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months (no more than 30 days before or after the required 36-month source test date). 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
24. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
25. 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. 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. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SO_x (lb/MMBtu) - ARB Method 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D3246, D4084, D4468, D6667 or double GC for H₂S and mercaptans performed in laboratory, fuel gas h_hv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 1081, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
27. 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
28. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

29. Copies of all fuel invoices showing quantity of supplier-certified gas delivered and copies of quality terms of supplier-certified gas delivery contracts shall be maintained. The operator shall record daily and annual amount, and types, of fuels combusted and all dates on which unit is fired on any non-certified fuel and record specific type of non-certified fuel used. [District Rules 2201 and 2520, 9.5.2] Federally Enforceable Through Title V Permit
30. Permittee shall maintain records of duration of each start-up and shutdown, and refractory curing, for a period of five years and make such records readily available for District inspection upon request. [District Rule 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
31. All records shall be maintained 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

AUTHORITY TO CONSTRUCT

PERMIT NO: S-1547-1149-1

ISSUANCE DATE: 04/12/2011

LEGAL OWNER OR OPERATOR: AERA ENERGY LLC
MAILING ADDRESS: PO BOX 11164
BAKERSFIELD, CA 93389-1164

LOCATION: HEAVY OIL WESTERN STATIONARY SOURCE
KERN COUNTY, CA

EQUIPMENT DESCRIPTION:

MODIFICATION OF 85.0 MMBTU/HR NATURAL GAS FIRED STEAM GENERATOR (SG100H) WITH NORTH AMERICAN 4231-85-GLE BURNER, OR DISTRICT APPROVED EQUIVALENT, AND FGR APPROVED TO OPERATE AT VARIOUS SPECIFIED LOCATIONS: LOWER NOX TO 7 PPMV, ENHANCE COMBUSTION CONTROLS AND ALTERNATIVELY REPLACE EXISTING BURNER WITH COEN MODEL QLN-ULN ULTRA LOW NOX BURNER, OR NORTH AMERICAN MODEL MAGNA FLAME LEX ULTRA LOW NOX BURNER, OR ACT GIDEON ULTRA LOW NOX BURNER, OR EQUIVALENT TO ACHIEVE 7 PPMV NOX

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. This unit is approved for operation at the following locations: NE/4 Section 33, T28S, R21E; SE/4 Section 33, T28S, R21E and SE/4 Section 28, T28S, R21E. [District Rule 4102]
3. Permittee shall notify the District Compliance Division of each location at which the unit is located in excess of 24 hours. Such notification shall be made no later than 48 hours after starting operation at the location. [District Rule 1070]
4. Flue gas recirculation (FGR) shall be utilized in conjunction with low-NOx burner to maintain ongoing compliance with permitted emission limits unless source testing pursuant to conditions 30, 34, 36, 37, 38 and 39 documents compliance without utilizing the flue gas recirculation. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Natural gas fuel sulfur content shall not exceed 0.75 grains S/100 scf. [District Rule 2201] 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

DAVID WARNER, Director of Permit Services

S-1547-1149-1 Nov 3 2011 1:06PM -- GOUGHDI Joint Inspection NOT Required

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

6. Duration of start-up and shutdown shall not exceed 2 hours each per occurrence. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
7. Duration of refractory curing shall not exceed 30 hours per each occurrence. Permittee shall notify the District in writing prior to refractory curing. [District Rule 2080] Federally Enforceable Through Title V Permit
8. Emission rates, except during startup, shutdown, and refractory curing, shall not exceed any of the following: PM10: 0.0076 lb/MMBtu, VOC: 0.0055 lb/MMBtu, NO_x (as NO₂): 7 ppmv @ 3% O₂, or CO: 25 ppmv @ 3% O₂. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
9. Emission rates during startup, shutdown and refractory curing shall not exceed: particulate matter - 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO₂; sulfur - 200 pounds of SO₂ per hour, or 2000 ppmv as SO₂, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO₂ - 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4101, 4102, 4301, 4405, 4406 and 4801] Federally Enforceable Through Title V Permit
10. Emission rates shall not exceed any of the following: PM10: 15.5 lb/day, SO_x (as SO₂): 4.4 lb/day, VOC: 11.2 lb/day, NO_x (as NO₂): 17.3 lb/day or CO: 37.7 lb/day. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
11. Annual quantity of natural gas fuel burned in this steam generator shall not exceed 730 MMscf/year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. 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 3246, D 4084, D 4468, D 6667 or grab sample analysis by double GC for H₂S and mercaptans performed in the laboratory. [District Rules 1070, 2201 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
13. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 1070, 2201, 2520, 9.4.2 and 4320] Federally Enforceable Through Title V Permit
14. 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 Rules 1070, 2520, 9.4.2; 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
15. If periodic monitoring of NO_x, CO, and O₂ concentrations is utilized, 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. Measurement shall be made with the FGR system in the mode of operation (closed or open) in which it was used in the preceding 30 days. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 2520, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
16. If 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 the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

17. 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
18. 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
19. All emissions measurements shall be made with the unit operating either at conditions representative of all operating modes, firing rates, and flue gas recirculation rates. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. For the purpose of permittee-performed alternate monitoring, emissions measurements may be performed at any time after the unit reaches conditions representative of normal operation. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
20. Whenever the unit is switched to operate with the flue gas recirculation (FGR) system in the closed position, compliance source testing for NO_x and CO shall be conducted within 60 days of cessation of FGR operation date unless source testing with FGR in closed position has occurred within the previous 12 months. [District Rule 1070] Federally Enforceable Through Title V Permit
21. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
- ~~22.~~ All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Last Amended December 16, 1993). [District Rule 1081, and County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 110 (Madera)] Federally Enforceable Through Title V Permit
23. 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 (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months (no more than 30 days before or after the required 36-month source test date). 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
24. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
25. 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. 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. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SO_x (lb/MMBtu) - ARB Method 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D3246, D4084, D4468, D6667 or double GC for H₂S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 1081, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
27. 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
28. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

29. Copies of all fuel invoices showing quantity of supplier-certified gas delivered and copies of quality terms of supplier-certified gas delivery contracts shall be maintained. The operator shall record daily and annual amount, and types, of fuels combusted and all dates on which unit is fired on any non-certified fuel and record specific type of non-certified fuel used. [District Rules 2201 and 2520, 9.5.2] Federally Enforceable Through Title V Permit
30. Permittee shall maintain records of duration of each start-up and shutdown, and refractory curing, for a period of five years and make such records readily available for District inspection upon request. [District Rule 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
31. All records shall be maintained 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

AUTHORITY TO CONSTRUCT

PERMIT NO: S-1547-1150-1

ISSUANCE DATE: 04/12/2011

LEGAL OWNER OR OPERATOR: AERA ENERGY LLC
MAILING ADDRESS: PO BOX 11164
BAKERSFIELD, CA 93389-1164

LOCATION: HEAVY OIL WESTERN STATIONARY SOURCE
KERN COUNTY, CA

EQUIPMENT DESCRIPTION:

MODIFICATION OF 85.0 MMBTU/HR NATURAL GAS FIRED STEAM GENERATOR (SG100J) WITH NORTH AMERICAN 4231-85-GLE BURNER, OR DISTRICT APPROVED EQUIVALENT, AND FGR APPROVED TO OPERATE AT VARIOUS SPECIFIED LOCATIONS.: LOWER NOX TO 7 PPMV, ENHANCE COMBUSTION CONTROLS AND ALTERNATIVELY REPLACE EXISTING BURNER WITH COEN MODEL QLN-ULN ULTRA LOW NOX BURNER, OR NORTH AMERICAN MODEL MAGNA FLAME LEX ULTRA LOW NOX BURNER, OR ACT GIDEON ULTRA LOW NOX BURNER, OR EQUIVALENT TO ACHIEVE 7 PPMV NOX

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. This unit is approved for operation at the following locations: NE/4 Section 33, T28S, R21E; SE/4 Section 33, T28S, R21E and SE/4 Section 28, T28S, R21E. [District Rule 4102]
3. Permittee shall notify the District Compliance Division of each location at which the unit is located in excess of 24 hours. Such notification shall be made no later than 48 hours after starting operation at the location. [District Rule 1070]
4. Flue gas recirculation (FGR) shall be utilized in conjunction with low-NOx burner to maintain ongoing compliance with permitted emission limits unless source testing pursuant to conditions 30, 34, 36, 37, 38 and 39 documents compliance without utilizing the flue gas recirculation. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Natural gas fuel sulfur content shall not exceed 0.75 grains S/100 scf. [District Rule 2201] 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

- ✓6. Duration of start-up and shutdown shall not exceed 2 hours each per occurrence. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- ✓7. Duration of refractory curing shall not exceed 30 hours per each occurrence. Permittee shall notify the District in writing prior to refractory curing. [District Rule 2080] Federally Enforceable Through Title V Permit
8. Emission rates, except during startup, shutdown, and refractory curing, shall not exceed any of the following: PM10: 0.0076 lb/MMBtu, VOC: 0.0055 lb/MMBtu, NOx (as NO2): 7 ppmv @ 3% O2, or CO: 25 ppmv @ 3% O2. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
9. Emission rates during startup, shutdown and refractory curing shall not exceed: particulate matter - 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO2; sulfur - 200 pounds of SO2 per hour, or 2000 ppmv as SO2, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO2 - 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4101, 4102, 4301, 4405, 4406 and 4801] Federally Enforceable Through Title V Permit
10. Emission rates shall not exceed any of the following: PM10: 15.5 lb/day, SOx (as SO2): 4.4 lb/day, VOC: 11.2 lb/day, NOx (as NO2): 17.3 lb/day or CO: 37.7 lb/day. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
11. Annual quantity of natural gas fuel burned in this steam generator shall not exceed 730 MMscf/year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3246, D 4084, D 4468, D 6667 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory. [District Rules 1070, 2201 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
13. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 1070, 2201, 2520, 9.4.2 and 4320] Federally Enforceable Through Title V Permit
14. 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 Rules 1070, 2520, 9.4.2; 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
15. If periodic monitoring of NOx, CO, and O2 concentrations is utilized, 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. Measurement shall be made with the FGR system in the mode of operation (closed or open) in which it was used in the preceding 30 days. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 2520, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
16. If NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

17. 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
18. 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
19. All emissions measurements shall be made with the unit operating either at conditions representative of all operating modes, firing rates, and flue gas recirculation rates. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. For the purpose of permittee-performed alternate monitoring, emissions measurements may be performed at any time after the unit reaches conditions representative of normal operation. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
20. Whenever the unit is switched to operate with the flue gas recirculation (FGR) system in the closed position, compliance source testing for NO_x and CO shall be conducted within 60 days of cessation of FGR operation date unless source testing with FGR in closed position has occurred within the previous 12 months. [District Rule 1070] Federally Enforceable Through Title V Permit
21. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
22. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Last Amended December 16, 1993). [District Rule 1081, and County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 110 (Madera)] Federally Enforceable Through Title V Permit
23. 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 (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months (no more than 30 days before or after the required 36-month source test date). 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
24. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
25. 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. 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. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SO_x (lb/MMBtu) - ARB Method 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D3246, D4084, D4468, D6667 or double GC for H₂S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 1081, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
27. 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
28. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

29. Copies of all fuel invoices showing quantity of supplier-certified gas delivered and copies of quality terms of supplier-certified gas delivery contracts shall be maintained. The operator shall record daily and annual amount, and types, of fuels combusted and all dates on which unit is fired on any non-certified fuel and record specific type of non-certified fuel used. [District Rules 2201 and 2520, 9.5.2] Federally Enforceable Through Title V Permit
30. Permittee shall maintain records of duration of each start-up and shutdown, and refractory curing, for a period of five years and make such records readily available for District inspection upon request. [District Rule 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
31. All records shall be maintained 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

AUTHORITY TO CONSTRUCT

PERMIT NO: S-1547-1151-1

ISSUANCE DATE: 04/12/2011

LEGAL OWNER OR OPERATOR: AERA ENERGY LLC
MAILING ADDRESS: PO BOX 11164
BAKERSFIELD, CA 93389-1164

LOCATION: HEAVY OIL WESTERN STATIONARY SOURCE
KERN COUNTY, CA

EQUIPMENT DESCRIPTION:

MODIFICATION OF 85.0 MMBTU/HR NATURAL GAS FIRED STEAM GENERATOR (SG100K) WITH NORTH AMERICAN 4231-85-GLE BURNER, OR DISTRICT APPROVED EQUIVALENT, AND FGR APPROVED TO OPERATE AT VARIOUS SPECIFIED LOCATIONS.: LOWER NOX TO 7 PPMV, ENHANCE COMBUSTION CONTROLS AND ALTERNATIVELY REPLACE EXISTING BURNER WITH COEN MODEL QLN-ULN ULTRA LOW NOX BURNER, OR NORTH AMERICAN MODEL MAGNA FLAME LEX ULTRA LOW NOX BURNER, OR ACT GIDEON ULTRA LOW NOX BURNER, OR EQUIVALENT TO ACHIEVE 7 PPMV NOX

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. This unit is approved for operation at the following locations: NE/4 Section 33, T28S, R21E; SE/4 Section 33, T28S, R21E and SE/4 Section 28, T28S, R21E. [District Rule 4102]
3. Permittee shall notify the District Compliance Division of each location at which the unit is located in excess of 24 hours. Such notification shall be made no later than 48 hours after starting operation at the location. [District Rule 1070]
4. Flue gas recirculation (FGR) shall be utilized in conjunction with low-NOx burner to maintain ongoing compliance with permitted emission limits unless source testing pursuant to conditions 30, 34, 36, 37, 38 and 39 documents compliance without utilizing the flue gas recirculation. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Natural gas fuel sulfur content shall not exceed 0.75 grains S/100 scf. [District Rule 2201] 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

DAVID WARNER, Director of Permit Services

S-1547-1151-1 Nov 3 2011 1:06PM - GOUGHD Joint Inspection NOT Required

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

6. Duration of start-up and shutdown shall not exceed 2 hours each per occurrence. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
7. Duration of refractory curing shall not exceed 30 hours per each occurrence. Permittee shall notify the District in writing prior to refractory curing. [District Rule 2080] Federally Enforceable Through Title V Permit
8. Emission rates, except during startup, shutdown, and refractory curing, shall not exceed any of the following: PM10: 0.0076 lb/MMBtu, VOC: 0.0055 lb/MMBtu, NO_x (as NO₂): 7 ppmv @ 3% O₂, or CO: 25 ppmv @ 3% O₂. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
9. Emission rates during startup, shutdown and refractory curing shall not exceed: particulate matter - 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO₂; sulfur - 200 pounds of SO₂ per hour, or 2000 ppmv as SO₂, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO₂ - 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4101, 4102, 4301, 4405, 4406 and 4801] Federally Enforceable Through Title V Permit
10. Emission rates shall not exceed any of the following: PM10: 15.5 lb/day, SO_x (as SO₂): 4.4 lb/day, VOC: 11.2 lb/day, NO_x (as NO₂): 17.3 lb/day or CO: 37.7 lb/day. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
11. Annual quantity of natural gas fuel burned in this steam generator shall not exceed 730 MMscf/year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. 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 3246, D 4084, D 4468, D 6667 or grab sample analysis by double GC for H₂S and mercaptans performed in the laboratory. [District Rules 1070, 2201 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
13. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 1070, 2201, 2520, 9.4.2 and 4320] Federally Enforceable Through Title V Permit
14. 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 Rules 1070, 2520, 9.4.2; 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
15. If periodic monitoring of NO_x, CO, and O₂ concentrations is utilized, 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. Measurement shall be made with the FGR system in the mode of operation (closed or open) in which it was used in the preceding 30 days. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 2520, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
16. If 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 the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

17. 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
18. 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
19. All emissions measurements shall be made with the unit operating either at conditions representative of all operating modes, firing rates, and flue gas recirculation rates. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. For the purpose of permittee-performed alternate monitoring, emissions measurements may be performed at any time after the unit reaches conditions representative of normal operation. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
20. Whenever the unit is switched to operate with the flue gas recirculation (FGR) system in the closed position, compliance source testing for NO_x and CO shall be conducted within 60 days of cessation of FGR operation date unless source testing with FGR in closed position has occurred within the previous 12 months. [District Rule 1070] Federally Enforceable Through Title V Permit
21. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
22. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Last Amended December 16, 1993). [District Rule 1081, and County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 110 (Madera)] Federally Enforceable Through Title V Permit
23. 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 (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months (no more than 30 days before or after the required 36-month source test date). 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
24. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
25. 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. 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. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SO_x (lb/MMBtu) - ARB Method 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D3246, D4084, D4468, D6667 or double GC for H₂S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 1081, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
27. 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
28. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

29. Copies of all fuel invoices showing quantity of supplier-certified gas delivered and copies of quality terms of supplier-certified gas delivery contracts shall be maintained. The operator shall record daily and annual amount, and types, of fuels combusted and all dates on which unit is fired on any non-certified fuel and record specific type of non-certified fuel used. [District Rules 2201 and 2520, 9.5.2] Federally Enforceable Through Title V Permit
30. Permittee shall maintain records of duration of each start-up and shutdown, and refractory curing, for a period of five years and make such records readily available for District inspection upon request. [District Rule 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
31. All records shall be maintained 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

ATTACHMENT C

Previous Title V Operating Permit No.
(S-1547-1148-3, '-1149-3, '-1150-3 and '-1151-0)

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-1148-3

EXPIRATION DATE: 05/31/2016

EQUIPMENT DESCRIPTION:

85.0 MMBTU/HR NATURAL GAS FIRED STEAM GENERATOR WITH NORTH AMERICAN 4231-85-GLE BURNER (SG100G) AND FGR APPROVED TO OPERATE AT VARIOUS SPECIFIED LOCATIONS.

PERMIT UNIT REQUIREMENTS

1. This unit is approved for operation at the following locations: NE/4 Section 33, T28S, R21E; SE/4 Section 33, T28S, R21E and SE/4 Section 28, T28S, R21E. [District Rule 4102]
2. Permittee shall notify the District Compliance Division of each location at which the unit is located in excess of 24 hours. Such notification shall be made no later than 48 hours after starting operation at the location. [District Rule 1070]
3. Flue gas recirculation (FGR) shall be utilized in conjunction with low-NOx burner to maintain ongoing compliance with permitted emission limits unless source testing documents compliance without utilizing the flue gas recirculation. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Natural gas fuel sulfur content shall not exceed 0.75 grains S/100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Duration of startup and shutdown (as defined in Rule 4320) shall not exceed 2 hours each per occurrence. Refractory curing period is defined as a maintenance-based reduced-load period of time during which a unit is brought from a shutdown status to staged rates of firing for the sole purpose of curing new refractory lining of the unit, and shall not exceed 30 hours per occurrence. The operator shall maintain records of the duration of start-up, shutdown, and refractory curing periods. [District Rule 4305, 5.5; 4306, 5.3 and 4320, 5.6] Federally Enforceable Through Title V Permit
6. Emission rates, except during startup, shutdown, and refractory curing, shall not exceed any of the following: PM10: 0.0076 lb/MMBtu, VOC: 0.0055 lb/MMBtu, NOx (as NO2): 7 ppmv @ 3% O2, or CO: 25 ppmv @ 3% O2. [District Rules 2201, 4305, 5.1; 4306, 5.1 and 4320, 5.2] Federally Enforceable Through Title V Permit
7. Emission rates during startup, shutdown and refractory curing shall not exceed: particulate matter - 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO2; sulfur - 200 pounds of SO2 per hour, or 2000 ppmv as SO2, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO2 - 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4301, 5.2; 4405, 5.2; 4406, 4.2 and 4801, 3.1] Federally Enforceable Through Title V Permit
8. Emission rates shall not exceed any of the following: PM10: 15.5 lb/day, SOx (as SO2): 4.4 lb/day, VOC: 11.2 lb/day, NOx (as NO2): 22.2 lb/day or CO: 37.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Annual quantity of natural gas fuel burned in this steam generator shall not exceed 730 MMscf/year. [District Rule 2201] Federally Enforceable Through Title V Permit
10. 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 3246, D 4084, D 4468, D 6667 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory. [District Rules 1070, 2201 and 2520, 9.4.2] 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.

11. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 1070, 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. 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, 9.4.2; 4305, 6.2; 4306, 6.2 and 4320, 6.2] Federally Enforceable Through Title V Permit
13. If periodic monitoring of NO_x, CO or O₂ concentrations is utilized, 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, 5.4; 4306, 5.4 and 4320, 5.7] Federally Enforceable Through Title V Permit
14. If 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 the performing the notification and testing required by this condition. [District Rules 4305, 5.4; 4306, 5.4 and 4320, 5.7] 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, 5.5; 4306, 5.5 and 4320, 5.8] Federally Enforceable Through Title V Permit
16. 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, 5.4; 4306, 5.4 and 4320, 5.7] Federally Enforceable Through Title V Permit
17. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise specified in the Permit to Operate no determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. For the purposes of permittee-performed alternate monitoring, emissions measurements may be performed at any time after the unit reaches conditions representative of normal operation. [District Rules 4305, 5.5; 4306, 5.5 and 4320, 5.8] Federally Enforceable Through Title V Permit
18. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081, 7.2] 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.

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, (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months, (no more than 30 days before or after the required 36 months source test date). If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 6.3; 4306, 6.3 and 4320, 6.3] 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, 5.5; 4306, 5.5 and 4320, 5.5] Federally Enforceable Through Title V Permit
21. 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. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit
22. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SOx (lb/MMBtu) - ARB Method 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D3246, D4084, D4468, D6667 or double GC for H2S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 1081, 6.1; 4305, 6.2; 4306, 6.2 and 4320, 6.2] Federally Enforceable Through Title V Permit
23. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5; 4306, 5.5 and 4320, 5.8] Federally Enforceable Through Title V Permit
24. The operator shall maintain 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. Copies of all fuel invoices showing quantity of supplier-certified gas delivered and copies of quality terms of supplier-certified gas delivery contracts shall be maintained. The operator shall record daily and annual amount, and types, of fuels combusted and all dates on which unit is fired on any non-certified fuel and record specific type of non-certified fuel used. [District Rules 2201 and 2520, 9.5.2] Federally Enforceable Through Title V Permit
26. Permittee shall maintain records of duration of each start-up, shutdown and refractory curing, for a period of five years and make such records available for District inspection upon request. [District Rules 2080, 4305, 6.1. 4306, 6.1 and 4320, 6.1] Federally Enforceable Through Title V Permit
27. All records shall be maintained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0; 4305, 6.1; 4306, 6.1 and 4320, 6.1] 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-1547-1149-3

EXPIRATION DATE: 05/31/2016

EQUIPMENT DESCRIPTION:

85.0 MMBTU/HR NATURAL GAS FIRED STEAM GENERATOR WITH NORTH AMERICAN 4231-85-GLE BURNER (SG100H) AND FGR APPROVED TO OPERATE AT VARIOUS SPECIFIED LOCATIONS.

PERMIT UNIT REQUIREMENTS

1. This unit is approved for operation at the following locations: NE/4 Section 33, T28S, R21E; SE/4 Section 33, T28S, R21E and SE/4 Section 28, T28S, R21E. [District Rule 4102]
2. Permittee shall notify the District Compliance Division of each location at which the unit is located in excess of 24 hours. Such notification shall be made no later than 48 hours after starting operation at the location. [District Rule 1070]
3. Flue gas recirculation (FGR) shall be utilized in conjunction with low-NO_x burner to maintain ongoing compliance with permitted emission limits unless source testing documents compliance without utilizing the flue gas recirculation. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Natural gas fuel sulfur content shall not exceed 0.75 grains S/100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Duration of startup and shutdown (as defined in Rule 4320) shall not exceed 2 hours each per occurrence. Refractory curing period is defined as a maintenance-based reduced-load period of time during which a unit is brought from a shutdown status to staged rates of firing for the sole purpose of curing new refractory lining of the unit, and shall not exceed 30 hours per occurrence. The operator shall maintain records of the duration of start-up, shutdown, and refractory curing periods. [District Rule 4305, 5.5; 4306, 5.3 and 4320, 5.6] Federally Enforceable Through Title V Permit
6. Emission rates, except during startup, shutdown, and refractory curing, shall not exceed any of the following: PM10: 0.0076 lb/MMBtu, VOC: 0.0055 lb/MMBtu, NO_x (as NO₂): 9 ppmv @ 3% O₂, or CO: 25 ppmv @ 3% O₂. [District Rules 2201, 4305, 5.1; 4306, 5.1 and 4320, 5.2] Federally Enforceable Through Title V Permit
7. Emission rates during startup, shutdown and refractory curing shall not exceed: particulate matter - 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO₂; sulfur - 200 pounds of SO₂ per hour, or 2000 ppmv as SO₂, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO₂ - 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4301, 5.2; 4405, 5.2; 4406, 4.2 and 4801, 3.1] Federally Enforceable Through Title V Permit
8. Emission rates shall not exceed any of the following: PM10: 15.5 lb/day, SO_x (as SO₂): 4.4 lb/day, VOC: 11.2 lb/day, NO_x (as NO₂): 22.2 lb/day or CO: 37.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Annual quantity of natural gas fuel burned in this steam generator shall not exceed 730 MMscf/year. [District Rule 2201] Federally Enforceable Through Title V Permit
10. 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 3246, D 4084, D 4468, D 6667 or grab sample analysis by double GC for H₂S and mercaptans performed in the laboratory. [District Rules 1070, 2201 and 2520, 9.4.2] 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.

11. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 1070, 2201 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
12. 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, 9.4.2; 4305, 6.2; 4306, 6.2 and 4320, 6.2] Federally Enforceable Through Title V Permit
13. If periodic monitoring of NO_x, CO and O₂ concentrations is utilized, 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, 5.4; 4306, 5.4 and 4320, 5.7] Federally Enforceable Through Title V Permit
14. If 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 the performing the notification and testing required by this condition. [District Rules 4305, 5.4; 4306, 5.4 and 4320, 5.7] 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, 5.5; 4306, 5.5 and 4320, 5.8] Federally Enforceable Through Title V Permit
16. 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, 5.4; 4306, 5.4 and 4320, 5.7] Federally Enforceable Through Title V Permit
17. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise specified in the Permit to Operate no determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. For the purposes of permittee-performed alternate monitoring, emissions measurements may be performed at any time after the unit reaches conditions representative of normal operation. [District Rules 4305, 5.5; 4306, 5.5 and 4320, 5.8] Federally Enforceable Through Title V Permit
18. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081, 7.2] 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.

19. 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, (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months, (no more than 30 days before or after the required 36 months source test date). If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 6.3; 4306, 6.3 and 4320, 6.3] 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, 5.5; 4306 and 4320, 5.5] Federally Enforceable Through Title V Permit
21. 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. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit
22. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SO_x (lb/MMBtu) - ARB Method 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D3246, D4084, D4468, D6667 or double GC for H₂S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 1081, 6.1; 4305, 6.2; 4306, 6.2 and 4320, 6.2] Federally Enforceable Through Title V Permit
23. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5; 4306, 5.5 and 4320, 5.8] Federally Enforceable Through Title V Permit
24. The operator shall maintain 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. Copies of all fuel invoices showing quantity of supplier-certified gas delivered and copies of quality terms of supplier-certified gas delivery contracts shall be maintained. The operator shall record daily and annual amount, and types, of fuels combusted and all dates on which unit is fired on any non-certified fuel and record specific type of non-certified fuel used. [District Rules 2201 and 2520, 9.5.2] Federally Enforceable Through Title V Permit
26. Permittee shall maintain records of duration of each start-up, shutdown and refractory curing, for a period of five years and make such records available for District inspection upon request. [District Rules 2080, 4305, 6.1. 4306, 6.1 and 4320, 6.1] Federally Enforceable Through Title V Permit
27. All records shall be maintained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0; 4305, 6.1; 4306, 6.1 and 4320, 6.1] 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-1547-1150-3

EXPIRATION DATE: 05/31/2016

EQUIPMENT DESCRIPTION:

85.0 MMBTU/HR NATURAL GAS FIRED STEAM GENERATOR WITH NORTH AMERICAN 4231-85-GLE BURNER (SG100I) AND FGR APPROVED TO OPERATE AT VARIOUS SPECIFIED LOCATIONS.

PERMIT UNIT REQUIREMENTS

1. This unit is approved for operation at the following locations: NE/4 Section 33, T28S, R21E; SE/4 Section 33, T28S, R21E and SE/4 Section 28, T28S, R21E. [District Rule 4102]
2. Permittee shall notify the District Compliance Division of each location at which the unit is located in excess of 24 hours. Such notification shall be made no later than 48 hours after starting operation at the location. [District Rule 1070]
3. Flue gas recirculation (FGR) shall be utilized in conjunction with low-NOx burner to maintain ongoing compliance with permitted emission limits unless source testing documents compliance without utilizing the flue gas recirculation. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Natural gas fuel sulfur content shall not exceed 0.75 grains S/100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Duration of startup and shutdown (as defined in Rule 4320) shall not exceed 2 hours each per occurrence. Refractory curing period is defined as a maintenance-based reduced-load period of time during which a unit is brought from a shutdown status to staged rates of firing for the sole purpose of curing new refractory lining of the unit, and shall not exceed 30 hours per occurrence. The operator shall maintain records of the duration of start-up, shutdown, and refractory curing periods. [District Rule 4305, 5.5; 4306, 5.3 and 4320, 5.6] Federally Enforceable Through Title V Permit
6. Emission rates, except during startup, shutdown, and refractory curing, shall not exceed any of the following: PM10: 0.0076 lb/MMBtu, VOC: 0.0055 lb/MMBtu, NOx (as NO2): 9 ppmv @ 3% O2, or CO: 25 ppmv @ 3% O2. [District Rules 2201, 4305, 5.1; 4306, 5.1 and 4320, 5.2] Federally Enforceable Through Title V Permit
7. Emission rates during startup, shutdown and refractory curing shall not exceed: particulate matter - 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO2; sulfur - 200 pounds of SO2 per hour, or 2000 ppmv as SO2, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO2 - 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4301, 5.2; 4405, 5.2; 4406, 4.2 and 4801, 3.1] Federally Enforceable Through Title V Permit
8. Emission rates shall not exceed any of the following: PM10: 15.5 lb/day, SOx (as SO2): 4.4 lb/day, VOC: 11.2 lb/day, NOx (as NO2): 22.2 lb/day or CO: 37.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Annual quantity of natural gas fuel burned in this steam generator shall not exceed 730 MMscf/year. [District Rule 2201] Federally Enforceable Through Title V Permit
10. 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 3246, D 4084, D 4468, D 6667 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory. [District Rules 1070, 2201 and 2520, 9.4.2] 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.

11. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 1070, 2201 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
12. 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, 9.4.2; 4305, 6.2; 4306, 6.2 and 4320, 6.2] Federally Enforceable Through Title V Permit
13. If periodic monitoring of NO_x, CO, and O₂ concentrations is utilized, 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, 5.4; 4306, 5.4 and 4320, 5.7] Federally Enforceable Through Title V Permit
14. If 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 the performing the notification and testing required by this condition. [District Rules 4305, 5.4; 4306, 5.4 and 4320, 5.7] 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, 5.5; 4306, 5.5 and 4320, 5.8] Federally Enforceable Through Title V Permit
16. 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, 5.4; 4306, 5.4 and 4320, 5.7] Federally Enforceable Through Title V Permit
17. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise specified in the Permit to Operate no determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. For the purposes of permittee-performed alternate monitoring, emissions measurements may be performed at any time after the unit reaches conditions representative of normal operation. [District Rules 4305, 5.5; 4306, 5.5 and 4320, 5.8] Federally Enforceable Through Title V Permit
18. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081, 7.2] 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.

19. 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, (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months, (no more than 30 days before or after the required 36 months source test date). If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 6.3; 4306, 6.3 and 4320, 6.3] 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, 5.5; 4306 and 4320, 5.5] Federally Enforceable Through Title V Permit
21. 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. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit
22. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SO_x (lb/MMBtu) - ARB Method 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D3246, D4084, D4468, D6667 or double GC for H₂S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 1081, 6.1; 4305, 6.2; 4306, 6.2 and 4320, 6.2] Federally Enforceable Through Title V Permit
23. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5; 4306, 5.5 and 4320, 5.8] Federally Enforceable Through Title V Permit
24. The operator shall maintain 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. Copies of all fuel invoices showing quantity of supplier-certified gas delivered and copies of quality terms of supplier-certified gas delivery contracts shall be maintained. The operator shall record daily and annual amount, and types, of fuels combusted and all dates on which unit is fired on any non-certified fuel and record specific type of non-certified fuel used. [District Rules 2201 and 2520, 9.5.2] Federally Enforceable Through Title V Permit
26. Permittee shall maintain records of duration of each start-up, shutdown and refractory curing, for a period of five years and make such records available for District inspection upon request. [District Rules 2080, 4305, 6.1. 4306, 6.1 and 4320, 6.1] Federally Enforceable Through Title V Permit
27. All records shall be maintained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0; 4305, 6.1; 4306, 6.1 and 4320, 6.1] 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-1547-1151-0

EXPIRATION DATE: 05/31/2016

EQUIPMENT DESCRIPTION:

85.0 MMBTU/HR NATURAL GAS FIRED STEAM GENERATOR WITH NORTH AMERICAN 4231-85-GLE BURNER, OR DISTRICT APPROVED EQUIVALENT, AND FGR APPROVED TO OPERATE AT VARIOUS SPECIFIED LOCATIONS.

PERMIT UNIT REQUIREMENTS

1. This unit is approved for operation at the following locations: NE/4 Section 33, T28S, R21E; SE/4 Section 33, T28S, R21E and SE/4 Section 28, T28S, R21E. [District Rule 4102]
2. Permittee shall notify the District Compliance Division of each location at which the unit is located in excess of 24 hours. Such notification shall be made no later than 48 hours after starting operation at the location. [District Rule 1070]
3. Flue gas recirculation (FGR) shall be utilized in conjunction with low-NOx burner to maintain ongoing compliance with permitted emission limits unless source testing documents compliance without utilizing the flue gas recirculation. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Natural gas fuel sulfur content shall not exceed 0.75 grains S/100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Duration of start-up and shutdown shall not exceed 2 hours each per occurrence. [District Rule 4305 and 4306] Federally Enforceable Through Title V Permit
6. Duration of refractory curing shall not exceed 30 hours per each occurrence. Permittee shall notify the District in writing prior to refractory curing. [District Rule 2080] Federally Enforceable Through Title V Permit
7. Emission rates, except during startup, shutdown, and refractory curing, shall not exceed any of the following: PM10: 0.0076 lb/MMBtu, VOC: 0.0055 lb/MMBtu, NOx (as NO2): 9 ppmv @ 3% O2, or CO: 25 ppmv @ 3% O2. [District Rules 2201, 4305 and 4306] Federally Enforceable Through Title V Permit
8. Emission rates during startup, shutdown and refractory curing shall not exceed: particulate matter - 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO2; sulfur - 200 pounds of SO2 per hour, or 2000 ppmv as SO2, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO2 - 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4101, 4102, 4301, 4405, 4406 and 4801] Federally Enforceable Through Title V Permit
9. Emission rates shall not exceed any of the following: PM10: 15.5 lb/day, SOx (as SO2): 4.4 lb/day, VOC: 11.2 lb/day, NOx (as NO2): 22.2 lb/day or CO: 37.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Annual quantity of natural gas fuel burned in this steam generator shall not exceed 730 MMscf/year. [District Rule 2201] Federally Enforceable Through Title V Permit
11. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3246, D 4084, D 4468, D 6667 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory. [District Rules 1070, 2201 and 2520, 9.4.2] 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. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 1070, 2201 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
13. 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 Rules 1070, 2520, 9.4.2; 4305 and 4306] Federally Enforceable Through Title V Permit
14. If FGR system on unit is not used or used intermittently, monitoring shall consist of use of a portable analyzer. If FGR system on unit is continuously used, monitoring shall consist of either use of a portable analyzer or monitoring of FGR rate based on parameters established during initial compliance source testing. The alternate monitoring scheme selected for this unit shall be established prior to implementation of this Authority to Construct. [District Rule 4306] Federally Enforceable Through Title V Permit
15. If periodic monitoring of NOX, CO, and O2 concentrations is utilized, 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. Measurement shall be made with the FGR system in the mode of operation (closed or open) in which it was used in the preceding 30 days. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 2520, 4305 and 4306] Federally Enforceable Through Title V Permit
16. If periodic monitoring of NOX, CO, and O2 concentrations is utilized and the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
17. If periodic monitoring of NOX, CO, and O2 concentrations is utilized, all alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
18. If periodic monitoring of NOX, CO, and O2 concentrations is utilized, the permittee shall maintain records of: (1) the date and time of NOX, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
19. If periodic determination of FGR rate by O2 measurement is utilized, the flue gas recirculation rate shall be determined at least on a weekly basis by measuring the stack O2% by volume (Os), and windbox O2% by volume (Ow) using the following equation: $FGR\ rate = \{Ow - 20.9\} / \{Os - 20.9\} \times 100\%$. 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 week. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 4305 and 4306] 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.

20. If periodic determination of FGR rate by O₂ measurement is utilized, the minimum flue gas recirculation rate shall be established by source testing this unit or other representative units per Rule 4305 and as approved by the District. The normal range/level shall be no lower than the minimum flue gas recirculation rate with which compliance with applicable NO_x and CO emission limits has been demonstrated through source testing at a similar firing rate. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
21. If periodic determination of FGR rate by O₂ measurement is utilized, and the flue gas recirculation rate is less than the normal range/level, the permittee shall return the flue gas recirculation rate to the normal range/level as soon as possible, but no longer than 1 hour of operation after detection. If the flue gas recirculation rate is not returned to the normal range/level within 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a source test within 60 days of the first exceedance, to demonstrate compliance with the applicable emission limits at the new flue gas recirculation rate. A District-approved portable analyzer may be used in lieu of a source test to demonstrate compliance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
22. If periodic determination of FGR rate by O₂ measurement is utilized, the permittee shall maintain records of the date and time of oxygen concentration measurements, the measured oxygen concentrations, the calculated flue gas recirculation rate, and the firing rate at the time of the oxygen concentration measurements. The records shall also include a description of any corrective action taken to maintain the flue gas recirculation rate within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
23. If periodic determination of FGR rate by O₂ measurement is utilized, during the 36-month source testing interval, the operator shall have unit tuned at least twice each calendar year, from four to eight months apart, in which it operates, by a technician that is qualified, to the satisfaction of the APCO, in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). Semi-annual tuning is not required if emissions are monitored monthly with a portable analyzer. [District Rule 4306] Federally Enforceable Through Title V Permit
24. If periodic determination of FGR rate by O₂ measurement is utilized, and the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rule 4306] Federally Enforceable Through Title V Permit
25. If periodic monitoring of FGR rate and firing rate is selected, the acceptable range of positions of the atmospheric combustion air control valve and fuel firing rates shall be established by testing emissions from this unit or other representative units, as approved by the District. The acceptable ranges shall be maintained during operation at levels which compliance with applicable NO_x and CO emission rates have been demonstrated through source testing. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
26. All emissions measurements shall be made with the unit operating either at conditions representative of all operating modes, firing rates, and flue gas recirculation rates. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
27. Whenever the unit is switched to operate with the flue gas recirculation (FGR) system in the closed position, compliance source testing for NO_x and CO shall be conducted within 60 days of cessation of FGR operation date. [District Rule 1070] Federally Enforceable Through Title V Permit
28. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] 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.

29. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Last Amended December 16, 1993). [District Rule 1081, and County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 110 (Madera)] Federally Enforceable Through Title V Permit
30. Source testing to measure NO_x and CO emissions from this unit shall be conducted whenever flue gas recirculation rate is changed. [District Rules 2201, 4305 and 4306] Federally Enforceable Through Title V Permit
31. 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 (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months (no more than 30 days before or after the required 36-month source test date). If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
32. 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
33. 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. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
34. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SO_x (lb/MMBtu) - ARB Method 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D3246, D4084, D4468, D6667 or double GC for H₂S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 1081, 4305 and 4306] Federally Enforceable Through Title V Permit
35. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
36. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit
37. Copies of all fuel invoices showing quantity of supplier-certified gas delivered and copies of quality terms of supplier-certified gas delivery contracts shall be maintained. The operator shall record daily and annual amount, and types, of fuels combusted and all dates on which unit is fired on any non-certified fuel and record specific type of non-certified fuel used. [District Rules 2201 and 2520, 9.5.2] Federally Enforceable Through Title V Permit
38. Permittee shall maintain records of duration of each start-up and shutdown, and refractory curing, for a period of five years and make such records readily available for District inspection upon request. [District Rule 4306] Federally Enforceable Through Title V Permit
39. All records shall be maintained 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.

ATTACHMENT D

Permit Application

S-1547-1148-2, 1149-2, 1150-2 & 1151-2

San Joaquin Valley Air Pollution Control District RECEIVED

APPLICATION FOR TITLE V MODIFICATION:

JUN - 6 2011

SJVAPCD
Southern Region

- ADMINISTRATIVE AMENDMENT
- MINOR MODIFICATION
- SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO:		AERA ENERGY LLC	
2. MAILING ADDRESS:			
STREET/P.O. BOX: _____			
CITY: P.O. BOX 11164	STATE: CA	9-DIGIT ZIP CODE: 93389-1164	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:		INSTALLATION DATE:	
STREET: Heavy Oil Western Source (S-1547)			
CITY: _____			
_____ 1/4 SECTION _____ TOWNSHIP _____ RANGE _____			
4. GENERAL NATURE OF BUSINESS:			
5. EQUIPMENT FOR WHICH APPLICATION IS MADE (Include Permit Nos.):			
Convert the following ATC(s) to PTO with operating conditions incorporated into the Title V permit:			
S-1547-1148-1, S-1547-1149-1, S-1547-1150-1, S-1547-1151-1			
<small>(Use additional sheets if necessary)</small>			
6. DO YOU REQUEST A CERTIFICATE OF CONFORMITY WITH THIS ACTION? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			
7. IS THIS APPLICATION SUBMITTED AS A RESULT OF A NOV/NTC? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO NOV/NTC No.: _____			
8. SIGNATURE OF APPLICANT/CONTACT PERSON:		TYPE OR PRINT TITLE OF APPLICANT:	
		Environmental Engineer	
9. TYPE OR PRINT NAME OF APPLICANT/CONTACT:		DATE:	
Brent Winn		6/2/11	
10. FAX NUMBER:		TELEPHONE NUMBER:	
(661) 665-7437		(661) 665-4363	

FOR APCD USE ONLY:

NO \$

DATE STAMP	FILING FEE RECEIVED: \$ _____ DATE PAID: _____ PROJECT NO.: <u>S-1112347</u> FACILITY REGION & ID: <u>S-1547</u>
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Title V - Minor Mod

San Joaquin Valley Unified Air Pollution Control District

TITLE V COMPLIANCE CERTIFICATION FORM

Lower NOx Limit to 7 ppm for Rule 4320	
Permit No.	Steam Gen No.
S-1547-1148-1	SG 100G
S-1547-1149-1	SG 100H
S-1547-1150-1	SG 100J
S-1547-1151-1	SG 100K

RECEIVED
JUN - 6 2011
SJVAPCD
Southern Region

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: Aera Energy LLC	FACILITY ID: S-1547
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: Aera Energy LLC	
3. Agent to the Owner: N/A	

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

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



Signature of Responsible Official

6-6-11

Date

R. B. Rust

Name of Responsible Official (please print)

Process Supervisor

Title of Responsible Official (please print)