



JUN 27 2011

Gerardo C. Rios, Chief  
Permits Office (AIR-3)  
U.S. EPA - Region IX  
75 Hawthorne St  
San Francisco, CA 94105

**Re: Notice of Final Action - Minor Title V Permit Modification  
District Facility # S-1547  
Project # S-1103713**

Dear Mr. Rios:

The Air Pollution Control Officer has modified the Title V permit for Aera Energy LLC by incorporating ATCs S-1547-78-30, '-123-27 and '-146-27. The project is to remove the SOx scrubbers and eliminate TEOR/waste gas firing capability of the three steam generators.

Enclosed is the modified Title V permit. The application and proposal were sent to US EPA Region IX on 8/10/2010. No comments were received following the District's preliminary decision on this project.

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

Sincerely,

*David Warner*  
David Warner  
Director of Permit Services

DW:dg

Enclosures

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

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

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

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



JUN 27 2011

Brent Winn  
Aera Energy LLC  
P.O. Box 11164  
Bakersfield, CA 93389-1164

**Re: Notice of Final Action - Minor Title V Permit Modification  
District Facility # S-1547  
Project # S-1103713**

Dear Mr. Winn:

The Air Pollution Control Officer has modified the Title V permit for Aera Energy LLC by incorporating ATCs S-1547-78-30, '-123-27 and '-146-27. The project is to remove the SOx scrubbers and eliminate TEOR/waste gas firing capability of the three steam generators.

Enclosed is the modified Title V permit. The application and proposal were sent to US EPA Region IX on 8/10/2010. No comments were received following the District's preliminary decision on this project.

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

Sincerely,

David Warner  
Director of Permit Services

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1547-78-31

**EXPIRATION DATE:** 05/31/2007

**SECTION:** NE29 **TOWNSHIP:** 28S **RANGE:** 21E

## **EQUIPMENT DESCRIPTION:**

62.5 MMBTU/HR NATURAL GAS FIRED-STEAM GENERATOR WITH A COEN ULTRA LOW NOX BURNER, WITH FLUE GAS RECIRCULATION, AND PIPING FROM S-1547-1079 (EAST FLANK LEASE), (#89, DIS# 27471-80) (GEN SITE 2972)

## **PERMIT UNIT REQUIREMENTS**

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1. 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 Kern County Rule 108.1] Federally Enforceable Through Title V Permit
2. Copies of all fuel invoices showing quantity and delivery points of certified gas delivered and copies of quality terms of certified gas delivery contracts shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
3. 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
4. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
5. When complying with SO<sub>x</sub> emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6; or EPA Method 6B; or EPA Method 8; or ARB Methods 8 or 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by GC-FPD/TCD performed in the laboratory and EPA Method 19 to calculate emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
6. If the unit is fired on noncertified gaseous fuel and compliance with SO<sub>x</sub> emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
7. 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, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

8. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements of SJVUAPCD Rules 4201 (Amended December 17, 1992), 4301 (Amended December 17, 1992), 4406 (Amended December 17, 1992, and Rule 4801 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
9. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), 110 (Madera) 402 (Madera), 404 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 405 (Madera), 408 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 407.2 (Kern, Tulare, Kings, Stanislaus, and San Joaquin), and 408.2 (Merced). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
10. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of 40 CFR 60, Subpart Dc (except 60.44c(g) and (h) and 60.48c). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
11. This unit has not been used to produce electricity for sale in 1985 or on or after November 15, 1990. Therefore, the requirements of 40 CFR 72.6(b) do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
12. Fuel sulfur content shall be certified by a third party fuel supplier or compliance with sulfur compound emission limit shall be demonstrated not less than once every 12 months by fuel gas sulfur content analysis and higher heating value analysis of each fuel source. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Duration of start-up and shutdown shall not exceed 2 hours each per occurrence. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
14. Duration of refractory curing shall not exceed 30 hours each per occurrence. Permittee shall notify the District in writing prior to refractory curing. [District Rule 2080] Federally Enforceable Through Title V Permit
15. Permittee shall maintain records of duration of each start-up, shutdown and refractory curing. [District Rules 2080, 4305, and 4306] Federally Enforceable Through Title V Permit
16. The unit shall only be fired on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
17. When natural gas fired, emission rates except during startup, shutdown, and refractory curing shall not exceed any of the following: PM10: 0.014 lb/MMBtu, SOx (as SO2): 0.002 lb/MMBtu, NOx (as NO2): 0.018 lb/MMBtu or 15 ppmv @ 3% O2, or CO: 50 ppmv @ 3% O2 [District Rules 2201 and 4305] Federally Enforceable Through Title V Permit
18. Emission rates during 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, 4405, 4406, and 4801] Federally Enforceable Through Title V Permit
19. The permittee shall monitor and record the stack concentration of NOX, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. 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, 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 either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
21. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. 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. 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
22. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
23. During the 36-month source testing interval, the operator shall tune the unit at least twice per calendar year, (from four to eight months apart) by a qualified technician in accordance with the procedure described in Rule 4304, and shall monitor, on a monthly basis, the unit's operational characteristics recommended by the manufacturer. 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. Source testing to measure NO<sub>x</sub> and CO emissions shall be conducted not less than once every 12 months, except as provided below. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
25. Whenever the unit is switched to operate with the flue gas recirculation (FGR) system in the closed position, compliance source testing for NO<sub>x</sub> and CO shall be conducted within 60 days of cessation of FGR operation date unless source testing with FGR system in the closed position has occurred within the previous 12 months. [District Rule 1070] Federally Enforceable Through Title V Permit
26. 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. [District Rule 4306] Federally Enforceable Through Title V Permit
27. Source testing to measure NO<sub>x</sub> and CO emissions shall be conducted not less than once every 36 months if compliance is demonstrated on two consecutive annual tests. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
28. If permittee fails any compliance demonstration for NO<sub>x</sub> or CO emission limits when testing not less than once every 36 months, compliance with NO<sub>x</sub> and CO emission limits shall be demonstrated not less than once every 12 months. [District Rule 4305 and 4306] Federally Enforceable Through Title V Permit
29. 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
30. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

31. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, NO<sub>x</sub> (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<sub>x</sub> (lb/MMBtu) - ARB Method 100 or EPA Method 6 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D3246 or double GC for H<sub>2</sub>S 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
32. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
33. All 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.**

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1547-123-28

**EXPIRATION DATE:** 05/31/2007

**SECTION:** NE29 **TOWNSHIP:** 28S **RANGE:** 21E

**EQUIPMENT DESCRIPTION:**

62.5 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH A COEN ULTRA LOW NOX BURNER AND A FLUE GAS RECIRCULATION (FGR) SYSTEM AND PIPING FORM S-1547-1079, (#133, DIS# 28715-83) (GEN SITE 2972)

## PERMIT UNIT REQUIREMENTS

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1. 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 Kern County Rule 108.1] Federally Enforceable Through Title V Permit
2. Copies of all fuel invoices showing quantity and delivery points of supplier-certified gas delivered and copies of quality terms of supplier-certified gas delivery contracts shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
3. 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
4. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
5. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6; or EPA Method 6B; or EPA Method 8; or ARB Methods 8 or 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculate emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
6. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D3246 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory. [District Rules 2520, 9.4.2; 4305, 6.2.1, and 4351, 6.2.1] Federally Enforceable Through Title V Permit
7. 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 2520, 4305, 4306, and 4351] Federally Enforceable Through Title V Permit

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

8. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements of SJVUAPCD Rules 4201 (Amended December 17, 1992), 4301 (Amended December 17, 1992), 4406 (Amended December 17, 1992, and Rule 4801 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
9. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of 40 CFR 60, Subpart Dc (except 60.44c(g) and (h) and 60.48c). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
10. This unit has not been used to produce electricity for sale in 1985 or on or after November 15, 1990. Therefore, the requirements of 40 CFR 72.6(b) do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
11. Fuel sulfur content shall be certified by a third party fuel supplier or compliance with sulfur compound emission limit shall be demonstrated not less than once every 12 months by fuel gas sulfur content analysis and higher heating value analysis of each fuel source. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Duration of start-up and shutdown shall not exceed 2 hours each per occurrence. [District Rule 4306] Federally Enforceable Through Title V Permit
13. Duration of refractory curing shall not exceed 30 hours each per occurrence. Permittee shall notify the District in writing prior to refractory curing. [District Rule 2080] Federally Enforceable Through Title V Permit
14. Permittee shall maintain records of duration of each start-up, shutdown and refractory curing, per a period of five years and make such records readily available for District inspection upon request. [District Rule 2080 & 4306] Federally Enforceable Through Title V Permit
15. The unit shall only be fired on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
16. When natural gas fired, except during startup, shutdown, and refractory curing, shall not exceed any of the following: PM10: 0.014 lb/MMBtu, SO<sub>x</sub> (as SO<sub>2</sub>): 0.002 lb/MMBtu, NO<sub>x</sub> (as NO<sub>2</sub>): 0.018 lb/MMBtu or 15 ppmv @ 3% O<sub>2</sub>, VOC: 0.003 lb/MMBtu, CO: 50 ppmv @ 3% O<sub>2</sub>. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
17. Emission rates during refractory curing shall not exceed: particulate matter - 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO<sub>2</sub>; sulfur - 200 pounds of SO<sub>2</sub> per hour, or 2000 ppmv as SO<sub>2</sub>, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO<sub>2</sub> - 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
18. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. 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 2520] Federally Enforceable Through Title V Permit
19. If the NO<sub>x</sub> and/or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305 and 4306]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

20. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
21. All emissions measurements for NO<sub>x</sub> and CO shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
22. Source testing to measure NO<sub>x</sub> and CO emissions shall be conducted not less than once every 12 months, except as provided below. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
23. Source testing to measure NO<sub>x</sub> and CO emissions shall be conducted not less than once every 36 months if compliance is demonstrated on two consecutive annual tests. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
24. If permittee fails any compliance demonstration for NO<sub>x</sub> or CO emission limits when testing not less than once every 36 months, compliance with NO<sub>x</sub> and CO emission limits shall be demonstrated not less than once every 12 months. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
25. 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
26. 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
27. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, NO<sub>x</sub> (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SO<sub>x</sub> (lb/MMBtu) - EPA Methods 6, 6B, or 8, or ARB Methods 8 or 100 and EPA Method 19, fuel gas sulfur content - ASTM D1072, D3031, D4084, D3246 or double GC for H<sub>2</sub>S and mercaptans, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588, PM<sub>10</sub> - EPA Method 201A and 202, or EPA Method 5 (assume all PM is PM<sub>10</sub>). [District Rules 1081 and 4305] Federally Enforceable Through Title V Permit
28. 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
29. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
30. When CVR or TVR gas fired, District-witnessed compliance source testing for PM<sub>10</sub> emission rate shall be conducted within 60 days prior to the permit anniversary once every three years, after demonstrating compliance on two consecutive annual source tests. [District Rules 1081 and District NSR Rule] Federally Enforceable Through Title V Permit
31. Emissions of SO<sub>x</sub>, without regard to any flue gas desulfurization, shall not exceed 70 tons/year. Permittee shall keep accurate annual records of the amount of each type of gas combusted, the sulfur content of each type of gas combusted, and a running total of the uncontrolled SO<sub>x</sub> emissions. [40 CFR Part 64] 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-1547-146-28

**EXPIRATION DATE:** 05/31/2007

**SECTION:** NE29 **TOWNSHIP:** 28S **RANGE:** 21E

**EQUIPMENT DESCRIPTION:**

62.5 MMBTU/HR C.E. NATCO NATURAL GAS-FIRED STEAM GENERATOR (#124, DIS# 27578-81), WITH A COEN ULN LOW NOX BURNER, O2 CONTROLLER, FLUE GAS RECIRCULATION (GEN SITE 2972)

## PERMIT UNIT REQUIREMENTS

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1. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Last Amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit
2. Copies of all fuel invoices showing quantity and delivery points of supplier-certified gas delivered and copies of quality terms of supplier-certified gas delivery contracts shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO<sub>2</sub>, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
4. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
5. When complying with SO<sub>x</sub> emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6; or EPA Method 6B; or EPA Method 8; or ARB Methods 8 or 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by double GC for H<sub>2</sub>S and mercaptans performed in the laboratory and EPA Method 19 to calculate emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
6. If the unit is fired on noncertified gaseous fuel, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D3246, D 4084, or grab sample analysis by double GC for H<sub>2</sub>S and mercaptans performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
7. If fuel analysis is used to demonstrate compliance with 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 2520, 9.3.2, 4305, 6.2.1, and 4306, 6.2.1] Federally Enforceable Through Title V Permit
8. Duration of start-up and shutdown shall not exceed 2 hours each per occurrence. [District Rules 4305, 5.5.6 and 4306, 5.5.6] Federally Enforceable Through Title V Permit
9. Duration of refractory curing shall not exceed 30 hours each per occurrence. Permittee shall notify the District in writing prior to refractory curing. [District Rule 2080] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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10. Permittee shall maintain records of duration of each start-up, shutdown and refractory curing, per a period of five years and make such records readily available for District inspection upon request. [District Rules 2080 & 4305, 6.1.5 and 4306, 6.1.4] Federally Enforceable Through Title V Permit
11. The unit shall only be fired on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
12. When natural gas fired, except during startup, shutdown, and refractory curing, emission rates shall not exceed any of the following: PM10: 0.014 lb/MMBtu, SO<sub>x</sub> (as SO<sub>2</sub>): 0.002 lb/MMBtu, NO<sub>x</sub> (as NO<sub>2</sub>): 0.018 lb/MMBtu or 15 ppmv @ 3% O<sub>2</sub>, VOC: 0.003 lb/MMBtu, or CO: 50 ppmv @ 3% O<sub>2</sub>. [District NSR Rule and District Rules 2520, 9.1, 4201, 4301, 5.2, 4305, 5.1, and 4306, 5.1] Federally Enforceable Through Title V Permit
13. Emission rates during refractory curing shall not exceed: particulate matter - 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO<sub>2</sub>; sulfur - 200 pounds of SO<sub>2</sub> per hour, or 2000 ppmv as SO<sub>2</sub>, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO<sub>2</sub> - 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4101, 4102, 4301, 5.0, 4405, 4406, and 4801 and Kern County Rule 407] Federally Enforceable Through Title V Permit
14. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 5.4.2 and 4306, 5.4] Federally Enforceable Through Title V Permit
15. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100 (amended December 17, 1992), the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 5.4.2 and 4306, 5.4] Federally Enforceable Through Title V Permit
16. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.4.2 and 4306, 5.4] Federally Enforceable Through Title V Permit
17. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 5.4.2 and 4306, 5.4] Federally Enforceable Through Title V Permit
18. All source test emission measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4305 (amended August 21, 2003). [District Rules 4305, 5.5.2 and 4306, 5.5.2] Federally Enforceable Through Title V Permit

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19. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District NSR Rule and District Rules 4305, 6.3 and 4306, 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, 5.5.1 and 4306, 5.5.1] Federally Enforceable Through Title V Permit
21. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
22. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
23. Compliance demonstration (source testing) shall be by District witnessed, or authorized. Sample collection shall be by an ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
24. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, NO<sub>x</sub> (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SO<sub>x</sub> (lb/MMBtu) - EPA Methods 6, 6B, or 8, or ARB Methods 8 or 100 and EPA Method 19, fuel gas sulfur content - ASTM D1072, D3246, D4084, or double GC for H<sub>2</sub>S and mercaptans, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588, PM<sub>10</sub> - EPA Method 201A and 202, or EPA Method 5 (assume all PM is PM<sub>10</sub>). [District Rules 1081, 4305, 6.2, and 4306, 6.2] Federally Enforceable Through Title V Permit
25. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5.5 and 4306, 5.5.5] Federally Enforceable Through Title V Permit
26. Fuel sulfur content shall be certified by a third party fuel supplier or compliance with sulfur compound emission limit shall be demonstrated not less than once every 12 months by fuel gas sulfur content analysis and higher heating value analysis of each fuel source. [District NSR Rule] Federally Enforceable Through Title V Permit
27. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District NSR Rule, District Rules 1070; 2520, 9.4.2; 4305, 6.1; and 4306, 6.1] Federally Enforceable Through Title V Permit

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