



OCT 25 2010

Paul Cummins  
Wellhead Power Gates, LLC  
650 Bercut Drive, Suite C  
Sacramento, CA 95814

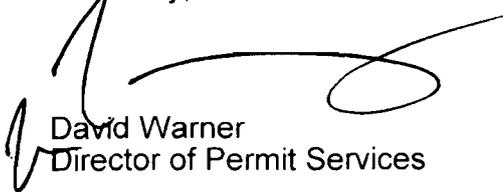
**Re: Administrative Amendment to Title V Operating Permit  
District Facility # C-3843  
Project # C-1102969**

Dear Mr. Cummins:

In accordance with District Rule 2520, Federally Mandated Operating Permits, the District reviewed the Wellhead Power Gates, LLC application and has administratively amended the requirements for their Title V operating permit. This administrative amendment incorporates the requirements of ATC C-3843-42, which was issued with Certificate of Conformity after EPA review into the Title V permit for this facility. The change is to designate the emissions unit as compliant dormant. This amended Title V permit is being sent to you as a final action.

Your cooperation in this matter was appreciated. Should you have any questions, please contact Mr. Jim Swaney at (559) 230-5900.

Sincerely,



David Warner  
Director of Permit Services

DW:jag

cc: Gerardo Rios, EPA Region IX

Enclosures

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

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**Northern Region**  
4800 Enterprise Way  
Modesto, CA 95356-8718  
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**Central Region (Main Office)**  
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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-3843-4-2

**EXPIRATION DATE:** 12/31/2008

**EQUIPMENT DESCRIPTION:**

COMPLIANT DORMANT 329 BHP CAT MODEL #G379 NATURAL GAS-FIRED IC ENGINE POWERING AN ELECTRICAL GENERATOR

## PERMIT UNIT REQUIREMENTS

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1. No modification to this unit shall be performed without an Authority to Construct for such modification(s), except for changes specified in conditions below. [District Rule 2010] Federally Enforceable Through Title V Permit
2. The fuel supply line shall be physically disconnected from this unit. [District Rule 4702] Federally Enforceable Through Title V Permit
3. A source test to demonstrate compliance with the indicated emission limits shall be performed within 60 days of recommencing operation of this unit. [District Rule 4702] Federally Enforceable Through Title V Permit
4. Operators shall notify the District at least seven (7) calendar days prior to commencing operation of this dormant emissions unit, at which time this permit will be administratively modified to remove DEU references. [District Rule 4702] Federally Enforceable Through Title V Permit
5. This engine shall be equipped with an operational nonresettable elapsed time meter or other APCO approved alternative. [District Rule 4702] Federally Enforceable Through Title V Permit
6. The engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702] Federally Enforceable Through Title V Permit
7. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102]
8. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702] Federally Enforceable Through Title V Permit
9. This engine shall be operated within the ranges that the source testing has shown result in pollution concentrations within the emissions limits as specified on this permit. [District Rule 4702] Federally Enforceable Through Title V Permit
10. Combined annual emissions from units C-3843-1 and -4 shall not exceed any of the following limits: 19,958 lb-NOx/year, 4,409 lb-SOx/year, 10,211 lb-PM10/year, 20,731 lb-CO/year, and 4,022 lb-VOC/year. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Emissions from this IC engine shall not exceed any of the following limits: 5 ppmvd NOx @ 15% O2 (equivalent to 0.072 g-NOx/hp-hr), 0.0104 g-SOx/hp-hr, 0.071 g-PM10/hp-hr, 670 ppmvd CO @ 15% O2 (equivalent to 5.69 g-CO/hp-hr), or 25 ppmvd VOC @ 15% O2 (equivalent to 0.125 g-VOC/hp-hr). [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
12. Upon recommencing operation, the permittee shall monitor operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (e.g. oil pressure, exhaust gas temperature, etc.). [District Rule 4702] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

13. Upon recommencing operation, 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 engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 4702] Federally Enforceable Through Title V Permit
14. Upon recommencing operation, 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 15% 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 Rule 4702] Federally Enforceable Through Title V Permit
15. Upon recommencing operation, Source testing to measure natural gas-combustion NO<sub>x</sub>, CO, and VOC emissions from this unit shall be measured not less than once every 24 months. [District Rules 4702] Federally Enforceable Through Title V Permit
16. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rules 4702] Federally Enforceable Through Title V Permit
17. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. VOC, NO<sub>x</sub>, and CO concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rules 4702] Federally Enforceable Through Title V Permit
18. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) - EPA Method 18, 25A or 25B, or ARB Method 100. [District Rules 1081 and 4702] Federally Enforceable Through Title V Permit
19. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
20. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
21. Upon recommencing operation, the permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type and quantity (cubic feet of gas or gallons of liquid) of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rules 4702] Federally Enforceable Through Title V Permit
22. Upon recommencing operation, the permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702] Federally Enforceable Through Title V Permit
23. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 4702] Federally Enforceable Through Title V Permit

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