



APR 26 2010

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

**Re: Notice of Preliminary Decision - ATC / Certificate of Conformity  
Facility # C-311  
Project # C-1095553**

Dear Mr. Rios:

Enclosed for your review is the District's engineering evaluation of an application for Authorities to Construct for Chevron U.S.A., Inc. located in the Coalinga Oilfield, CA, which has been issued a Title V permit. Chevron U.S.A., Inc. is requesting that Certificates of Conformity, with the procedural requirements of 40 CFR Part 70, be issued with this project. Chevron proposes to either retrofit these units or make them dormant for compliance with Rule 4320

Enclosed is the engineering evaluation of this application, along with the current Title V permit, and proposed Authorities to Construct # C-311-19-16, '-20-18, '-21-9, '-22-16, '-23-14, '-25-8, '-27-16, '-28-18, '-30-18, '-36-19, '-37-24, '-38-23, '-39-21, '-40-20, '-41-17, '-42-19, '-43-17, '-45-16, '-46-14, '-47-8, '-48-9, '-49-9, '-50-9, '-51-14, '-52-18, '-53-19, '-55-18, '-56-17, '-76-16, '-84-17, '-114-8, '-117-8 with Certificates of Conformity. After demonstrating compliance with the Authority to Construct, the conditions will be incorporated into the facility's Title V permit through an administrative amendment.

Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter. If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Thank you for your cooperation in this matter.

Sincerely,



David Warner  
Director of Permit Services

DW: KR/cm

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  
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



APR 26 2010

Mike Tollstrup, Chief  
Project Assessment Branch  
Air Resources Board  
P O Box 2815  
Sacramento, CA 95812-2815

Re: **Notice of Preliminary Decision - ATC / Certificate of Conformity**  
**Facility # C-311**  
**Project # C-1095553**

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of an application for Authorities to Construct for Chevron U.S.A., Inc. located in the Coalinga Oilfield, CA. Chevron proposes to either retrofit these units or make them dormant for compliance with Rule 4320

The public notice will be published approximately three days from the date of this letter. Please submit your written comments within the 30-day public comment period which begins on the date of publication of the public notice.

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.

Thank you for your cooperation in this matter.

Sincerely,



David Warner  
Director of Permit Services

DW: KR/cm

Enclosures

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

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**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT



**HEALTHY AIR LIVING™**

APR 26 2010

Mr. Larry Landis  
Chevron U.S.A., Inc.  
P.O. Box 1392  
Bakersfield, CA 93302

**Re: Notice of Preliminary Decision - ATC / Certificate of Conformity  
Facility # C-311  
Project # C-1095553**

Dear Mr. Landis:

Enclosed for your review and comment is the District's analysis of an application for Authorities to Construct for Chevron U.S.A., Inc. located in the Coalinga Oilfield, CA. Chevron proposes to either retrofit these units or make them dormant for compliance with Rule 4320

After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the Authorities to Construct will be issued to the facility with Certificates of Conformity. Prior to operating with modifications authorized by the Authorities to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

The public notice will be published approximately three days from the date of this letter. Please submit your written comments within the 30-day public comment period which begins on the date of publication of the public notice.

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

Thank you for your cooperation in this matter.

Sincerely,

David Warner  
Director of Permit Services

DW: KR/cm

Enclosures

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

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Fresno Bee

**NOTICE OF PRELIMINARY DECISION  
FOR THE PROPOSED ISSUANCE OF  
AUTHORITY TO CONSTRUCT**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District solicits public comment on the proposed issuance of Authority To Construct to Chevron U.S.A., Inc. for its crude oil and natural gas production located in the Coalinga Oilfield, California. Chevron proposes to either retrofit these units or make them dormant for compliance with Rule 4320

The analysis of the regulatory basis for these proposed actions, Project #C-1095553, is available for public inspection at [http://www.valleyair.org/notices/public\\_notices\\_idx.htm](http://www.valleyair.org/notices/public_notices_idx.htm) and the District office at the address below. Written comments on the proposed initial permit must be submitted within 30 days of the publication date of this notice to **DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 1990 E. GETTYSBURG AVE, FRESNO, CA 93726-0244.**

# San Joaquin Valley Air Pollution Control District Authority to Construct

## Modify Gas-Fired Steam Generators for Rule 4320 Compliance

Facility Name: Chevron USA, Inc. Date: April 16, 2010  
Mailing Address: P.O. Box 1392 Engineer: Kris Rickards  
Bakersfield, CA 93302 Lead Engineer: Rich Karrs *RWK 4/20/10*  
Contact Person: Larry Landis Sharon Walker  
Telephone: 661-654-7141 661-654-7487  
Fax: 661-654-7606 661-654-7004  
Email: [landilr@chevron.com](mailto:landilr@chevron.com) [swalk@chevron.com](mailto:swalk@chevron.com)  
Application #(s): C-311-19-16, '-19-17, '-20-18, '-21-9, '-22-16, '-23-14, '-25-8, '-27-16,  
'-28-18, '-30-18, '-36-19, '-37-24, '-38-23, '-39-21, '-40-20, '-41-17,  
'-42-19, '-43-17, '-45-16, '-46-14, '-47-8, '-48-9, '-49-9, '-50-9, '-51-14,  
'-52-18, '-53-19, '-55-18, '-56-17, '-76-16, '-84-17, '-114-8, '-117-8  
Project #: C-1095553  
Deemed Complete: January 5, 2010

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### I. PROPOSAL

Chevron USA, Inc. (hereafter referred to as CUSA) is requesting Authorities to Construct (ATCs) for the modification of 32 natural-gas-fired steam generators located within the CUSA's Fresno Heavy Oil Stationary Source. In order to comply with District Rule 4320 requirements, the applicant proposes the following scenarios for the steam generators:

- Limit NO<sub>x</sub> emissions to 9 and 12 ppmv @ 3% O<sub>2</sub> (dual limit for TEOR/TVC fired units) (Table 1.C.3)
- Limit fuel to either PUC-quality or to 5 gr-S/100 dscf (Section 5.4.1.1 or 5.4.1.2)
- Reduce SO<sub>2</sub> emissions by 95% or to 9 ppm using an emission control system (5.4.1.3)

CUSA is requesting authorization for the installation of a Low NO<sub>x</sub> burner on steam generator C-311-19 for Rule 4320 compliance. In addition, CUSA has also requested modifications to allow for the installation of optional use FGR piping on units C-311-20, '-21, '-114, and '-117 in order to attain the lower NO<sub>x</sub> limits.

CUSA intends to comply with NO<sub>x</sub> requirements of Rule 4320 by paying annual emission fees as allowed in Rule 4320 section 5.1.2. The proposed ATCs are solely an optional form of compliance.

CUSA requests that PUC gas-fired unit's SO<sub>x</sub> emission factors be made consistent with the District approved SO<sub>x</sub> factor of 0.00285 lb/MMBtu per APR 1720.

There will not be an increase in potential emissions of any pollutant as a result of this project. Modification of the NO<sub>x</sub> emission limits, limiting the sulfur, replacing the burners, and replacing or modifying the air fuel train components are proposed solely to comply with District Rule 4320 requirements. Since there is a change to the method of operation

of the steam generators these changes are modifications pursuant to District Rule 2201, *New and Modified Stationary Source Review Rule*.

In addition, the facility currently follows Alternate Monitoring Scheme "A" using a portable analyzer, according to District Policy SSP-1105, and is requesting to maintain the current monitoring arrangement.

Chevron USA, Inc. received their Title V Permit on September 30, 2001. This modification can be classified as a Title V minor modification pursuant to Rule 2520, Section 3.20, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. Chevron USA, Inc. must apply to administratively amend their Title V Operating Permit to include the requirements of the ATC(s) issued with this project.

There are no unimplemented ATCs for any units in this project (previous unimplemented ATCs authorizing the installation of Low NO<sub>x</sub> burners have expired and will be replaced with ATCs issued with this project).

## II. APPLICABLE RULES

- Rule 2201 New and Modified Stationary Source Review Rule (9/21/06)
- Rule 2520 Federally Mandated Operating Permits (6/21/01)
- Rule 4001 New Source Performance Standards (4/14/99)
- Rule 4101 Visible Emissions (2/17/05)
- Rule 4102 Nuisance (12/17/92)
- Rule 4201 Particulate Matter Concentration (12/17/92)
- Rule 4301 Fuel Burning Equipment (12/17/92)
- Rule 4304 Equipment Tuning Procedure for Boilers, Steam Generators and Process Heaters (10/19/95)
- Rule 4305 Boilers, Steam Generators and Process Heaters – Phase II (8/21/03)
- Rule 4306 Boilers, Steam Generators and Process Heaters – Phase III (10/16/08)
- Rule 4320 Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr (10/16/08)
- Rule 4801 Sulfur Compounds (12/17/92)
- CH&SC 41700 Health Risk Assessment
- CH&SC 42301.6 School Notice
- Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)
- California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

## III. PROJECT LOCATION

These units are located at the Coalinga Oilfield within CUSA's Fresno Heavy Oil Stationary Source; Township 20S, Range 14E. The equipment will not be located within 1,000 feet of the outer boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

#### IV. PROCESS DESCRIPTION

Chevron operates permitted equipment within their Fresno Heavy Oil Stationary Source, utilized for the thermally enhanced production of crude oil and natural gas. In thermally enhanced oil recovery (TEOR), natural gas is combusted in steam generators to produce steam for injection into heavy crude oil bearing strata via injection wells to reduce viscosity of the crude oil, thereby facilitating thermally enhanced oil production.

#### V. EQUIPMENT LISTING

##### Pre-Project Equipment Description:

See Appendix A.

##### Proposed Modifications:

C-311-19-17 will be implemented before '19-16 and will serve as the base document for this modification.

Facility	Unit	Mod.	Equipment Description
311	19	16	MODIFICATION OF 58.5 MMBTU/HR SG 13-03 THERMOTICS STEAM GENERATOR, MODEL 5G-50-NDS-15, WITH NORTH AMERICAN GLE MAGNA-FLAME LOW-NOX BURNER WITH FLUE GAS RECIRCULATION AND O2 CONTROLLER: LIMIT NOX TO 9 OR 12 PPM @ 3% O2, AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE
311	19	17	MODIFICATION OF 58.5 MMBTU/HR SG 13-03 THERMOTICS STEAM GENERATOR, MODEL 5G-50-NDS-15, WITH NORTH AMERICAN GAS BURNER, MODEL 6131G-LO-NOX WITH FLUE GAS RECIRCULATION AND O2 CONTROLLER: INSTALL A NORTH AMERICAN GLE MAGNA-FLAME LOW-NOX BURNER, REDUCE NOX LIMIT TO 15 PPM @ 3% O2 FOR RULE 4306 COMPLIANCE, AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE
311	20	18	MODIFICATION OF 58.5 MMBTU/HR NATURAL GAS-FIRED STRUTHERS THERMOFLOOD SG 13-04 STEAM GENERATOR WITH A NORTH AMERICAN GLE LOW-NOX BURNER WITH OXYGEN CONTROLLER: INSTALL OPTIONAL USE FGR, LIMIT NOX TO 9 OR 12 PPM @ 3% O2, AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE
311	21	9	MODIFICATION OF 58.5 MMBTU/HR SG 13-5 STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE LOW-NOX BURNER: INSTALL OPTIONAL USE FGR, LIMIT NOX TO 9 OR 12 PPM @ 3% O2, AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

Facility	Unit	Mod.	Equipment Description
311	22	16	MODIFICATION OF 58.5 MMBTU/HR SG 13-06 THERMOTICS STEAM GENERATOR, MODEL 5G-50-NDS-15, WITH A NORTH AMERICAN GLE LOW NOX BURNER, FLUE GAS RECIRCULATION SYSTEM, AND O2 CONTROLLER: LIMIT NOX TO 9 OR 12 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE
311	23	14	MODIFICATION OF 58.5 MMBTU/HR SG 13-07 THERMOTICS STEAM GENERATOR, MODEL 5G-50-NDS-15, WITH A NORTH AMERICAN GLE LOW-NOX BURNER WITH FLUE GAS RECIRCULATION AND O2 CONTROLLER: LIMIT NOX TO 9 OR 12 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE
311	25	8	MODIFICATION OF 58.5 MMBTU/HR SG 13-9 STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE LOW-NOX BURNER AND FLUE GAS RECIRCULATION: LIMIT NOX TO 9 OR 12 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE
311	27	16	MODIFICATION OF 58.5 MMBTU/HR STRUTHERS THERMOFLOOD STEAM GENERATOR #13-11, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE BURNER, EQUIPPED WITH FLUE GAS RECIRCULATION AND AN OXYGEN CONTROLLER: LIMIT NOX TO 9 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT FOR RULE 4320 COMPLIANCE
311	28	18	MODIFICATION OF 58.5 MMBTU/HR STRUTHERS THERMOFLOOD STEAM GENERATOR #13-12, MODEL OH-50-ND-16XAM, EQUIPPED WITH A NORTH AMERICAN GLE BURNER, FLUE GAS RECIRCULATION (FGR), AND AN OXYGEN CONTROLLER: LIMIT NOX TO 9 OR 12 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE
311	30	18	MODIFICATION OF 62.5 MMBTU/HR STRUTHERS THERMOFLOOD STEAM GENERATOR #13-14, MODEL OH-50-ND-16XAM, NATURAL GAS FIRED, WITH A NORTH AMERICAN GLE BURNER, AN OXYGEN CONTROLLER, AND A FLUE GAS RECIRCULATION (FGR) SYSTEM: LIMIT NOX TO 9 OR 12 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

Facility	Unit	Mod.	Equipment Description
311	36	19	MODIFICATION OF 58.5 MMBTU/HR STRUTHERS THERMOFLOOD STEAM GENERATOR (SG #25-15), MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE LOW-NOX BURNER, FLUE GAS RECIRCULATION SYSTEM AND AN OXYGEN CONTROLLER SERVED BY THE 25D NEPTUNE AIRPOL CAUSTIC SCRUBBER WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS FROM SECTIONS 25D AND 6C ONLY: LIMIT NOX TO 9 OR 12 PPM @ 3% O2 AND REQUIRE 95% SULFUR REMOVAL OR 9 PPM SOX LIMIT IN EXHAUST FOR RULE 4320 COMPLIANCE
311	37	24	MODIFICATION OF 62.5 MMBTU/HR STRUTHERS THERMOFLOOD MODEL OH-50-ND-16XAM STEAM GENERATOR (#25-16) WITH A NORTH AMERICAN MODEL GLE LOW NOX BURNER WITH FLUE GAS RECIRCULATION (FGR) SERVED BY THE 25D NEPTUNE AIRPOL CAUSTIC SCRUBBER WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS: LIMIT NOX TO 9 OR 12 PPM @ 3% O2 AND REQUIRE 95% SULFUR REMOVAL OR 9 PPM SOX LIMIT IN EXHAUST FOR RULE 4320 COMPLIANCE
311	38	23	MODIFICATION OF 58.5 MMBTU/HR SG 25-17 STRUTHERS THERMOFLOOD MODEL #OH-50-ND-16XAM NATURAL GAS/LPG/WC/TVG GAS-FIRED STEAM GENERATOR WITH A NORTH AMERICAN MAGNA-FLAME GLE ULTRA-LOW NOX BURNER AND FLUE GAS RECIRCULATION SERVED BY THE 25D NEPTUNE AIRPOL CAUSTIC SCRUBBER WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS (SG 25-17): LIMIT NOX TO 9 OR 12 PPM @ 3% O2 AND REQUIRE 95% SULFUR REMOVAL OR 9 PPM SOX LIMIT IN EXHAUST FOR RULE 4320 COMPLIANCE
311	39	21	MODIFICATION OF 58.5 MMBTU/HR STRUTHERS THERMOFLOOD STEAM GENERATOR #25-18, MODEL OH-50-ND-16XAM, EQUIPPED WITH A NORTH AMERICAN GLE BURNER AND FLUE GAS RECIRCULATION SERVED BY THE 25D NEPTUNE AIRPOL CAUSTIC SCRUBBER WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS: LIMIT NOX TO 9 OR 12 PPM @ 3% O2 AND REQUIRE 95% SULFUR REMOVAL OR 9 PPM SOX LIMIT IN EXHAUST FOR RULE 4320 COMPLIANCE
311	40	20	MODIFICATION OF 58.5 MMBTU/HR NATURAL GAS, LPG OR PROCESS GAS FIRED STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE BURNER, FLUE GAS RECIRCULATION SYSTEM, AN OXYGEN CONTROLLER, SERVED BY THE NEPTUNE AIRPOL CAUSTIC SCRUBBER WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS (COMMON TO C-311-37) (SG-25-19): LIMIT NOX TO 9 OR 12 PPM @ 3% O2 AND REQUIRE 95% SULFUR REMOVAL OR 9 PPM SOX LIMIT IN EXHAUST FOR RULE 4320 COMPLIANCE

Facility	Unit	Mod.	Equipment Description
311	41	17	MODIFICATION OF 58.5 MMBTU/HR SG 25-20 STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE BURNER AND FLUE GAS RECIRCULATION SYSTEM, SERVED BY THE NEPTUNE AIRPOL CAUSTIC SCRUBBER WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS: LIMIT NOX TO 9 OR 12 PPM @ 3% O2 AND REQUIRE 95% SULFUR REMOVAL OR 9 PPM SOX LIMIT IN EXHAUST FOR RULE 4320 COMPLIANCE
311	42	19	MODIFICATION OF 58.5 MMBTU/HR SG 25-21 STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE LOW NOX BURNER AND FLUE GAS RECIRCULATION SYSTEM: LIMIT NOX TO 9 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE
311	43	17	MODIFICATION OF 58.5 MMBTU/HR SG 25-22 STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16AXM, WITH A NORTH AMERICAN GLE LOW-NOX BURNER AND A FLUE GAS RECIRCULATION (FGR) SYSTEM: LIMIT NOX TO 9 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE
311	45	16	MODIFICATION OF 58.5 MMBTU/HR SG 25-24 STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16AXM, WITH A NORTH AMERICAN GLE LOW NOX BURNER AND FLUE GAS RECIRCULATION SYSTEM: LIMIT NOX TO 9 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE
311	46	14	MODIFICATION OF 58.5 MMBTU/HR SG 25-25 STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE LOW-NOX BURNER WITH FLUE GAS RECIRCULATION: LIMIT NOX TO 9 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE
311	47	8	MODIFICATION OF 58.5 MMBTU/HR SG 25-26 STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16-XAM, WITH A NORTH AMERICAN GLE LOW-NOX BURNER, AND A FLUE GAS RECIRCULATION SYSTEM: LIMIT NOX TO 9 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE
311	48	9	MODIFICATION OF 58.5 MMBTU/HR SG 25-27 STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE LOW-NOX BURNER, AND A FLUE GAS RECIRCULATION SYSTEM: LIMIT NOX TO 9 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

Facility	Unit	Mod.	Equipment Description
311	49	9	MODIFICATION OF 58.5 MMBTU/HR SG 25-28 STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-DN-16XAM, WITH A NORTH AMERICAN GLE LOW-NOX BURNER AND A FLUE GAS RECIRCULATION (FGR) SYSTEM: LIMIT NOX TO 9 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE
311	50	9	MODIFICATION OF 58.5 MMBTU/HR SG 25-29 STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-DN-16XAM, WITH A NORTH AMERICAN GLE LOW-NOX BURNER, AND A GAS RECIRCULATION SYSTEM: LIMIT NOX TO 9 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE
311	51	14	MODIFICATION OF 58.5 MMBTU/HR SG 6-31 STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE LOW-NOX BURNER WITH FLUE GAS RECIRCULATION: LIMIT NOX TO 9 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT FOR RULE 4320 COMPLIANCE
311	52	18	MODIFICATION OF 58.5 MMBTU/HR SG STRUTHERS THERMOFLOOD STEAM GENERATOR #6-32, MODEL OH-50-ND-16XAM, EQUIPPED WITH A NORTH AMERICAN GLE LOW-NOX BURNER, FLUE GAS RECIRCULATION SYSTEM, AND AN OXYGEN CONTROLLER: LIMIT NOX TO 9 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE
311	53	19	MODIFICATION OF 58.5 MMBTU/HR STRUTHERS THERMOFLOOD STEAM GENERATOR #6-33, MODEL OH-50-ND-16XAM, EQUIPPED WITH A NORTH AMERICAN GLE LOW-NOX BURNER (OR DISTRICT APPROVED EQUIVALENT), FLUE GAS RECIRCULATION SYSTEM, AND AN OXYGEN CONTROLLER: LIMIT NOX TO 9 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE
311	55	18	MODIFICATION OF 58.5 MMBTU/HR STRUTHERS THERMOFLOOD (#6-35) MODEL OH-50-ND-16XAM NATURAL GAS/TEOR GAS-FIRED STEAM GENERATOR WITH A NORTH AMERICAN GLE LOW-NOX BURNER AND FLUE GAS RECIRCULATION: LIMIT NOX TO 9 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

Facility	Unit	Mod.	Equipment Description
311	56	17	MODIFICATION OF 58.5 MMBTU/HR STRUTHERS THERMOFLOOD STEAM GENERATOR #6-36, MODEL OH-50-ND-16XAM, NATURAL GAS FIRED, EQUIPPED WITH A NORTH AMERICAN BURNER, MODEL 4131G, AN OXYGEN CONTROLLER, AND A FLUE GAS RECIRCULATION (FGR) SYSTEM: LIMIT NOX TO 9 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE
311	76	16	MODIFICATION OF 58.5 MMBTU/HR STRUTHERS THERMOFLOOD (SG 6-38) MODEL OH-50-ND-16XAM NATURAL GAS/LPG/TEOR GAS-FIRED STEAM GENERATOR WITH A NORTH AMERICAN MODEL MAGNA FLAME GLE LOW NOX BURNER AND FLUE GAS RECIRCULATION SYSTEM INCLUDING AN OXYGEN CONTROLLER: LIMIT NOX TO 9 OR 12 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE
311	84	17	MODIFICATION OF 58.5 MMBTU/HR STRUTHERS THERMOFLOOD (SG 6-37) MODEL OH50-ND-16XAM NATURAL GAS/LPG/TEOR GAS (COMMON TO C-311-37, SG 25-19) FIRED STEAM GENERATOR WITH A NORTH AMERICAN MODEL MAGNA FLAME GLE LOW NOX BURNER AND FLUE GAS RECIRCULATION: LIMIT NOX TO 9 OR 12 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE
311	114	8	MODIFICATION OF 23 MMBTU/HR HOPPER STEAM GENERATOR, HSG-36, NATURAL GAS FIRED WITH A NORTH AMERICAN GLE LOW-NOX BURNER, DIS #21013-66: INSTALL OPTIONAL USE FGR, LIMIT NOX TO 9 PPM @ 3% O2, AND LIMIT FUEL GAS SULFUR CONTENT FOR RULE 4320 COMPLIANCE
311	117	8	MODIFICATION OF 23 MMBTU/HR HOPPER STEAM GENERATOR, HSG-1, NATURAL GAS FIRED, WITH A NORTH AMERICAN GLE LOW-NOX BURNER, DIS #5702-66: INSTALL OPTIONAL USE FGR, LIMIT NOX TO 9 PPM @ 3% O2, AND LIMIT FUEL GAS SULFUR CONTENT FOR RULE 4320 COMPLIANCE

**Post Project Equipment Description:**

*For all units except C-311-19-17 installing Low-NO<sub>x</sub> burners:*

PTO C-311-XX-XX: [BASE DOCUMENT EQUIPMENT DESCRIPTION] [WITH OPTIONAL USE FGR OR BLANK]

PTO C-311-19-17: 58.5 MMBTU/HR SG 13-03 THERMOTICS STEAM GENERATOR, MODEL 5G-50-NDS-15, WITH NORTH AMERICAN GLE MAGNA-FLAME LOW-NOX BURNER WITH FLUE GAS RECIRCULATION AND O2 CONTROLLER

## VI. EMISSION CONTROL TECHNOLOGY EVALUATION

Ultra Low-NO<sub>x</sub> burners reduce NO<sub>x</sub> formation by producing lower flame temperatures (and longer flames) than conventional burners. Conventional burners thoroughly mix all the fuel and air in a single stage just prior to combustion, whereas low-NO<sub>x</sub> burners delay the mixing of fuel and air by introducing the fuel (or sometimes the air) in multiple stages. Generally, in the first combustion stage, the air-fuel mixture is fuel rich. In a fuel rich environment, all the oxygen will be consumed in reactions with the fuel, leaving no excess oxygen available to react with nitrogen to produce thermal NO<sub>x</sub>. In the secondary and tertiary stages, the combustion zone is maintained in a fuel-lean environment. The excess air in these stages helps to reduce the flame temperature so that the reaction between the excess oxygen with nitrogen is minimized.

The use of flue gas re-circulation (FGR) can reduce nitrogen oxides (NO<sub>x</sub>) emissions by 60% to 70%. In an FGR system, a portion of the flue gas is re-circulated back to the inlet air. As flue gas is composed mainly of nitrogen and the products of combustion, it is much lower in oxygen than the inlet air and contains virtually no combustible hydrocarbons to burn. Thus, flue gas is practically inert. The addition of an inert mass of gas to the combustion reaction serves to absorb heat without producing heat, thereby lowering the flame temperature. Since thermal NO<sub>x</sub> is formed by high flame temperatures, the lower flame temperatures produced by FGR serve to reduce thermal NO<sub>x</sub>.

In order to comply with District Rule 4320 NO<sub>x</sub> requirements, the applicant proposed to implement the staged enhanced schedule option in Table 1. The staged enhanced schedule with dual NO<sub>x</sub> limits is proposed for when the unit is fired on either <50% or >50% by volume PUC quality gas. This results in limits of 12 ppmv @ 3% O<sub>2</sub> (burning <50% PUC gas) and 9 ppmv @ 3% O<sub>2</sub> (burning >50% PUC gas).

To comply with the particulate control CUSA is proposing to fire the units solely on PUC quality gas (per section 5.4.1.1), limit the fuel sulfur content to 5 gr-S/100 dscf (per section 5.4.1.2), or operate a sulfur scrubber (per section 5.4.1.3).

Units operated with a sulfur scrubber have already been found to be in compliance with Rule 4320 (project S-1093036). These same units are being evaluated in this project to provide CUSA with a lower NO<sub>x</sub> emissions limit to comply with Rule 4320.

## VII. GENERAL CALCULATIONS

### A. Assumptions

- The maximum operating schedule is 24 hours per day
- The units are fired on TEOR/natural gas and liquefied petroleum gas
- Natural Gas Heating Value: 1,000 Btu/scf (per APR 1720)
- F-Factor for Natural Gas: 8,578 dscf/MMBtu corrected to 60°F (40 CFR 60, Appendix B)
- During start-up and shutdown periods the steam generators will have emissions no greater than 0.1 lb-NO<sub>x</sub>/MMBtu and 0.084 lb-CO/MMBtu (previously approved factors for these steam generators)
- Daily NO<sub>x</sub> emissions will be based on the Rule 4305 limit of 30 ppmv to account for startups and shutdowns (District Practice)

- There will be no change in currently permitted, daily nor annual, potential to emit for CO, VOC, or PM<sub>10</sub>
- The revised SO<sub>x</sub> emission factor (per APR 1720) for PUC quality gas of 0.00285 lb/MMBtu will not result in an emissions change (per APR 1110)

**B. Emission Factors**

**Pre-Project Emission Factors (EF1)**

Permit Unit	Pollutant	Pre-Project Emission Factor for NO <sub>x</sub> (EF1)		Source
C-311-19	NO <sub>x</sub>	0.036 lb/MMBtu	30 ppmvd NO <sub>x</sub> (@ 3% O <sub>2</sub> )	Current Permit
All units in this project except C-311-19	NO <sub>x</sub>	0.018 lb/MMBtu	15 ppmvd NO <sub>x</sub> (@ 3% O <sub>2</sub> )	Current Permit
All	SO <sub>x</sub>	Various Factors, see Section VII.C.1	See Section VII.C.1	Current Permit

**Post-Project Emission Factors (EF2)**

Permit Unit	Pollutant	Post-Project Emission Factor for NO <sub>x</sub> (EF2)		Source
C-311-27, '42, '43, '45, '46, '47, '48, '49, '50, '51, '52, '53, '55, '56, '114-8, and '117-8	NO <sub>x</sub>	0.011 lb/MMBtu	9 ppmvd NO <sub>x</sub> (@ 3% O <sub>2</sub> )	Rule 4320 Table 1, Category C.2.b
C-311-19, '20, '21, '22, '23, '25, '28, '30, '36, '37, '38, '39, '40, '41, '76-16, and '84-17	NO <sub>x</sub>	0.014 lb/MMBtu	12 ppmvd NO <sub>x</sub> (@ 3% O <sub>2</sub> )	Rule 4320 Table 1, Category C.3

The SO<sub>x</sub> emission factor is calculated as follows for units opting to limit the sulfur concentration in the fuel to 5 gr-S/100 dscf:

$$\left( \frac{64 \text{ lb} - \text{SO}_x}{32 \text{ lb} - \text{S}} \right) \frac{5 \text{ gr} - \text{S}}{100 \text{ dscf}} \left( \frac{1 \text{ lb}}{7,000 \text{ gr}} \right) \frac{\text{dscf}}{1,000 \text{ Btu}} \left( \frac{10^6 \text{ Btu}}{\text{MMBtu}} \right) = 0.0143 \frac{\text{lb} - \text{SO}_x}{\text{MMBtu}}$$

The resulting SO<sub>x</sub> emission rate is 0.0143 lb/MMBtu. Units with an emission limit below 0.0143 lb-SO<sub>x</sub>/MMBtu will retain the lower SO<sub>x</sub> emission factor.

For units complying with section 5.4.1.3 of Rule 4320 (see table below) the exhaust emissions will be reduced by either 95% or to 9 ppmv corrected to 3.0% O<sub>2</sub> by the existing Neptune Airpol caustic scrubber. When the steam generators are not being fired on well casing or tank vapor recovery gas they will achieve the SO<sub>x</sub> requirement by burning PUC quality gas. Therefore, the worst case Post-Project SO<sub>x</sub> emissions from the steam generators (units connected to the scrubber) will be when non-PUC

quality gas is burned (95% reduction in SO<sub>x</sub> or 9 ppmv-SO<sub>x</sub> will be achieved by the scrubber).

Permit Unit	Pollutant	Post-Project Emission Factor for SO <sub>x</sub> (EF <sub>2</sub> )		Source
C-311-27, '-114, and '-117	SO <sub>x</sub>	0.00285 lb/MMBtu	PUC Quality Gas (4320 limits to 5 gr-S/100 dscf)	Rule 4320 Section 5.4.1.1
C-311-51	SO <sub>x</sub>	0.003 lb/MMBtu	PUC Quality Gas (4320 limits to 5 gr-S/100 dscf)	Rule 4320 Section 5.4.1.1
C-311-42, '-43, '-45, '-46, '-47, '-48, '-49, '-50, '-52, '-53, '-55, and '-56	SO <sub>x</sub>	0.0143 lb/MMBtu	PUC Quality Gas (4320 limits to 5 gr-S/100 dscf)	Rule 4320 Section 5.4.1.1
C-311-19, '-20, '-21, '-22, '-23, '-25, '-28, '-30, '-76, and '-84	SO <sub>x</sub>	0.0143 lb/MMBtu	5 gr-S/100 dscf	Rule 4320 Section 5.4.1.2
C-311-36, '-37, '-38, '-39, '-40, and '-41	SO <sub>x</sub>	0.052 <sup>1</sup>	PE <sub>1</sub> <sup>1</sup>	Rule 4320, Section 5.4.1.3

### C. Calculations

Since there is no change in emission rates or potential to emit for CO, VOC, and PM<sub>10</sub> for all units, emissions for these pollutants are not calculated in this project.

#### 1. Pre-Project Potential to Emit (PE1)

The PE1 for each pollutant is calculated with the following equation, except for daily NO<sub>x</sub>, (and summarized on the next table):

$$PE1 = EF1 \text{ (lb/MMBtu)} \times \text{Heat Input (MMBtu/day or year)}$$

Unit	EF <sub>PE1</sub> NO <sub>x</sub> (lb/MMBtu)	EF <sub>PE1</sub> SO <sub>x</sub> (lb/MMBtu)	Daily Fuel Limit (MMBtu/day)	PE1 Daily NO <sub>x</sub> (lb/day)	PE1 Daily SO <sub>x</sub> (lb/day)	Annual Fuel Limit (MMBtu/yr)	PE1 Annual NO <sub>x</sub> (lb/year)	PE1 Annual SO <sub>x</sub> (lb/year)
19	0.036	0.157	1,404	50.5	220.4	457,800	15,696	71,875
20	0.018	0.157	1,404	50.5	220.4	457,800	8,240	71,875
21	0.018	0.157	1,404	50.5	220.4	457,800	8,240	71,875
22	0.018	0.157	1,404	50.5	220.4	457,800	8,240	71,875
23	0.018	0.157	1,404	50.5	220.4	457,800	8,240	71,875
25	0.018	0.052	1,404	50.5	73.0	435,000	7,830	22,620
27	0.018	0.00285	1,404	50.5	4.0	435,000	7,830	1,240
28	0.018	0.284	1,404	50.5	398.7	457,800	8,240	130,015
30	0.018	0.14	1,500	54.0	210.0	457,800	8,240	64,092
36	0.018	0.052	1,404	50.5	73.0	435,000	7,830	22,620

<sup>1</sup> SO<sub>x</sub> reduction is made through operation of caustic scrubber when non-PUC gas is incinerated

Unit	EF <sub>PE1</sub> NO <sub>x</sub> (lb/MMBtu)	EF <sub>PE1</sub> SO <sub>x</sub> (lb/MMBtu)	Daily Fuel Limit (MMBtu/day)	PE1 Daily NO <sub>x</sub> (lb/day)	PE1 Daily SO <sub>x</sub> (lb/day)	Annual Fuel Limit (MMBtu/yr)	PE1 Annual NO <sub>x</sub> (lb/year)	PE1 Annual SO <sub>x</sub> (lb/year)
37	0.018	0.052	1,404	50.5	73.0	457,800	8,240	23,806
38	0.018	0.052	1,404	50.5	73.0	457,800	8,240	23,806
39	0.018	0.052	1,404	50.5	73.0	457,800	8,240	23,806
40	0.018	0.052	1,404	50.5	73.0	434,700	7,825	22,604
41	0.018	0.052	1,404	50.5	73.0	435,000	7,830	22,620
42	0.018	0.052	1,404	50.5	73.0	434,700	7,825	22,604
43	0.018	0.052	1,404	50.5	73.0	434,700	7,825	22,604
45	0.018	0.052	1,404	50.5	73.0	434,700	7,825	22,604
46	0.018	0.052	1,404	50.5	73.0	434,700	7,825	22,604
47	0.018	0.052	1,404	50.5	73.0	435,000	7,830	22,620
48	0.018	0.052	1,404	50.5	73.0	435,000	7,830	22,620
49	0.018	0.052	1,404	50.5	73.0	435,000	7,830	22,620
50	0.018	0.052	1,404	50.5	73.0	435,000	7,830	22,620
51	0.018	0.003	1,404	50.5	4.2	434,700	7,825	1,304
52	0.018	0.14	1,404	50.5	196.6	457,800	8,240	64,092
53	0.018	0.14	1,404	50.5	196.6	457,800	8,240	64,092
55	0.018	0.14	1,404	50.5	196.6	457,800	8,240	64,092
56	0.018	0.14	1,404	50.5	196.6	457,800	8,240	64,092
76	0.018	0.043	1,404	50.5	60.4	434,700	7,825	18,692
84	0.018	0.043	1,404	50.5	60.4	434,700	7,825	18,692
114	0.018	0.00285	526	18.9	1.5	192,000	3,456	547
117	0.018	0.00285	526	18.9	1.5	192,000	3,456	547

## 2. Post-Project Potential to Emit (PE2)

The PE2 for each pollutant is calculated with the following equation, except for daily NO<sub>x</sub>, (and summarized on the next table):

$$PE2 = EF2 \text{ (lb/MMBtu)} \times \text{Heat Input (MMBtu/day or year)}$$

Unit	EF <sub>PE2</sub> NO <sub>x</sub> (lb/MMBtu)	EF <sub>PE2</sub> SO <sub>x</sub> (lb/MMBtu)	Daily Fuel Limit (MMBtu/day)	PE2 Daily NO <sub>x</sub> (lb/day)	PE2 Daily SO <sub>x</sub> (lb/day)	Annual Fuel Limit (MMBtu/yr)	PE2 Annual NO <sub>x</sub> (lb/year)	PE2 Annual SO <sub>x</sub> (lb/year)
19-16	0.014	0.0143	1,404	50.5	20.1	457,800	6,409	6,547
19-17	0.018	0.0143	1,404	50.5	20.1	457,800	8,240	6,547
20	0.014	0.0143	1,404	50.5	20.1	457,800	6,409	6,547
21	0.014	0.0143	1,404	50.5	20.1	457,800	6,409	6,547
22	0.014	0.0143	1,404	50.5	20.1	457,800	6,409	6,547
23	0.014	0.0143	1,404	50.5	20.1	457,800	6,409	6,547
25	0.014	0.0143	1,404	50.5	20.1	435,000	6,090	6,221
27	0.011	0.00285	1,404	50.5	4.0	435,000	4,785	1,240
28	0.014	0.0143	1,404	50.5	20.1	457,800	6,409	6,547
30	0.014	0.0143	1,500	54.0	21.5	457,800	6,409	6,547
36	0.014	0.052 <sup>2</sup>	1,404	50.5	73.0	435,000	6,090	22,620

<sup>2</sup> SO<sub>x</sub> reduction is made through operation of caustic scrubber when non-PUC gas is incinerated

Unit	EF <sub>PE2</sub> NO <sub>x</sub> (lb/MMBtu)	EF <sub>PE2</sub> SO <sub>x</sub> (lb/MMBtu)	Daily Fuel Limit (MMBtu/day)	PE2 Daily NO <sub>x</sub> (lb/day)	PE2 Daily SO <sub>x</sub> (lb/day)	Annual Fuel Limit (MMBtu/yr)	PE2 Annual NO <sub>x</sub> (lb/year)	PE2 Annual SO <sub>x</sub> (lb/year)
37	0.014	0.052 <sup>2</sup>	1,404	50.5	73.0	457,800	6,409	23,806
38	0.014	0.052 <sup>2</sup>	1,404	50.5	73.0	457,800	6,409	23,806
39	0.014	0.052 <sup>2</sup>	1,404	50.5	73.0	457,800	6,409	23,806
40	0.014	0.052 <sup>2</sup>	1,404	50.5	73.0	434,700	6,086	22,604
41	0.014	0.052 <sup>2</sup>	1,404	50.5	73.0	435,000	6,090	22,620
42	0.011	0.0143	1,404	50.5	20.1	434,700	4,782	6,216
43	0.011	0.0143	1,404	50.5	20.1	434,700	4,782	6,216
45	0.011	0.0143	1,404	50.5	20.1	434,700	4,782	6,216
46	0.011	0.0143	1,404	50.5	20.1	434,700	4,782	6,216
47	0.011	0.0143	1,404	50.5	20.1	435,000	4,785	6,221
48	0.011	0.0143	1,404	50.5	20.1	435,000	4,785	6,221
49	0.011	0.0143	1,404	50.5	20.1	435,000	4,785	6,221
50	0.011	0.0143	1,404	50.5	20.1	435,000	4,785	6,221
51	0.011	0.003	1,404	50.5	4.2	434,700	4,782	1,304
52	0.011	0.0143	1,404	50.5	20.1	457,800	5,036	6,547
53	0.011	0.0143	1,404	50.5	20.1	457,800	5,036	6,547
55	0.011	0.0143	1,404	50.5	20.1	457,800	5,036	6,547
56	0.011	0.0143	1,404	50.5	20.1	457,800	5,036	6,547
76	0.014	0.0143	1,404	50.5	20.1	434,700	6,086	6,216
84	0.014	0.0143	1,404	50.5	20.1	434,700	6,086	6,216
114	0.011	0.00285	526	18.9	1.5	192,000	2,112	547
117	0.011	0.00285	526	18.9	1.5	192,000	2,112	547

### 3. Pre-Project Stationary Source Potential to Emit (SSPE1)

SSPE1 calculations are necessary to aid the following determinations:

- If the facility is becoming a new Major Source, or
- An offset threshold will be surpassed, or
- A Stationary Source Increase in Permitted Emissions (SSIPE) public notice is triggered

Pursuant to Section 4.9 of District Rule 2201, the Pre-Project Stationary Source Potential to Emit (SSPE1) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

Facility emissions are already above the Offset and Major Source Thresholds for all pollutants. There is no increase in potential emissions for any of the units, for any pollutant in this project; therefore, SSPE1 calculations are not necessary.

#### **4. Post-Project Stationary Source Potential to Emit (SSPE2)**

SSPE2 calculations are necessary to aid the following determinations:

- If the facility is becoming a new Major Source,
- An offset threshold will be surpassed, or
- An SSIPE public notice is triggered

Pursuant to Section 4.10 of District Rule 2201, the Post-Project Stationary Source Potential to Emit (SSPE2) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

Facility emissions are already above the Offset and Major Source Thresholds for all pollutants. There is no increase in potential emissions for any of the units, for any pollutant in this project. The potential to emit NO<sub>x</sub> and SO<sub>x</sub> will decrease in accordance with District Rules 4306 and 4320. Therefore, SSPE2 calculations are not necessary.

#### **5. Major Source Determination**

Pursuant to Section 3.24 of District Rule 2201, a major source is a stationary source a Post-Project Stationary Source Potential to Emit (SSPE2), equal to or exceeding one or more of the Major Source threshold values (excluding ERCs banked onsite that have not been used onsite).

This source is an existing Major Source for all pollutants and will remain so. No change in Major Source status is proposed or expected as a result of this project.

#### **6. Baseline Emissions (BE)**

The BE calculation (in lb/year) is performed on a pollutant-by-pollutant basis to determine the amount of offsets required, where necessary, when the SSPE1 is greater than the offset threshold. This project is exempt from offsets pursuant to Rule 2201, Section 4.6.8 as the modification is being made solely to comply with Rule 4320. Therefore, BE calculations are not required.

#### **7. Major Modification**

This facility is an existing major source for all air contaminants.

District Rule 2201 references the definition of major modification provided in 40 CFR 51.165 (v)(A) in effect on December 19, 2002, where major modification means any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act.

Significant is defined under Part 51.165(x) as a net emissions increase in the potential of a source to emit any affected pollutant equal to or exceeding any applicable thresholds. For existing major sources in the San Joaquin Valley Air Basin, which is non-attainment for Ozone and PM10, a major modification occurs if the Net Emissions Increases (NEI) is equal to or greater than one or more of the following threshold values when calculated on actual to PE basis:

<b>Major Modification Thresholds (Existing Major Source)</b>			
Pollutant	NEI (lb/year)	Threshold (lb/year)	Major Modification?
NO <sub>x</sub>	>50,000	50,000	Yes <sup>3</sup>
SO <sub>x</sub>	>80,000	80,000	Yes <sup>3</sup>
PM <sub>10</sub>	>30,000	30,000	Yes <sup>3</sup>
VOC	>50,000	50,000	Yes <sup>3</sup>

Therefore, this project is a major modification and public notice is required.

## 8. Federal Major Modification

Pursuant to Rule 2201 Section 3.17 to determine if a project is a Federal major modification, the calculation procedure in 40 CFR 51.165(a)(2)(ii) shall be used.

This calculation procedure states that if the sum of the differences between the projected actual emissions and the baseline actual emissions (for existing emission units) or the sum of the potentials to emit (for new emission units) is significant, i.e. greater than the values listed in Rule 2201 Table 3-1, the project is a Federal major modification.

For existing emission units where there is no increase in design capacity the projected actual emissions (PAE) are equal to the emission rate at which the unit is projected to emit in any one year selected by the operator within 5 years after the unit resumes normal operation (10 years for existing units with an increase in design capacity). This projection is made by the operator and must be based on all relevant information, e.g. expected business activity.

For emission units (other than electric utility steam generating units) the baseline actual emissions (BAE) are calculated based on any 24 month period selected by the operator within the previous 10 year period. These emissions must not include any non-compliant operation

In calculating the emission increase (PAE – BAE), the portion of the emissions after the project that the unit could have actually emitted (during the same period used to determine BAE) that are unrelated to the particular project and emissions due to increased product demand are excluded.

<sup>3</sup> Due to the large number of affected units proposed by CUSA for Rule 4320 compliance, this project (considering that steam generators typically have actual emissions below their permitted emission levels) is presumed to cross one or more major modification thresholds.

For rule compliance projects, the difference between the PAE and the BAE (excluding emissions that the unit could have emitted during the baseline period) for pollutants targeted by the subject rule will be a negative value.

Additionally, it can reasonably be concluded that the difference between the PAE and the BAE (excluding emissions that the unit could have emitted during the baseline period) for non-targeted pollutants will be zero as any increase in actual emissions (after the project) would be due to increases in business activity and not due to the modification itself. Such emission increases are excluded when calculating the emission increase.

For the reasons stated above, this rule compliance project will not result in a significant emission increase and therefore is not a Federal major modification.

## **VIII. COMPLIANCE**

### **District Rule 2201 New and Modified Stationary Source Review Rule**

#### **A. Best Available Control Technology (BACT)**

##### **1. BACT Applicability**

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis for the following\*:

- a. Any new emissions unit with a potential to emit exceeding two pounds per day,
- b. The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
- c. Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or
- d. Any new or modified emissions unit, in a stationary source project, which results in a Major Modification.

\*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

However, BACT shall not be required for the following:

4.2.3 For existing facilities, the installation or modification of an emission control technique performed solely for the purpose of compliance with the requirements of District, State or Federal air pollution control laws, regulations, or orders, as approved by the APCO, shall be exempt from Best Available Control Technology for all air pollutants, provided all of the following conditions are met:

- 4.2.3.1 There shall be no increase in the physical or operational design of the existing facility, except for those changes to the design needed for the installation or modification of the emission control technique itself;
- 4.2.3.2 There shall be no increase in the permitted rating or permitted operating schedule of the permitted unit;
- 4.2.3.3 There shall be no increase in emissions from the stationary source that will cause or contribute to any violation of a National Ambient Air Quality

Standard, Prevention of Significant Deterioration increment, or Air Quality Related Value in Class I areas; and

- 4.2.3.4 The project shall not result in an increase in permitted emissions or potential to emit of more than 25 tons per year of NO<sub>x</sub>, or 25 tons per year of VOC, or 15 tons per year of SO<sub>x</sub>, or 15 tons per year of PM<sub>10</sub>, or 50 tons per year of CO.

Since each of the above-listed criteria is met, BACT is not required for any pollutant.

## **B. Offsets**

### **1. Offset Applicability**

The proposed modifications are solely for compliance with Rules 4306 and 4320, and are exempt from offsets if the following criteria are satisfied. Rule 2201, Section 4.6.8 provides the following exemption from offsets.

Emission offsets shall not be required for the following:

- 4.6.8 For existing facilities, the installation or modification of an emission control technique performed solely for the purpose of compliance with the requirements of District, State or Federal air pollution control laws, regulations, or orders, as approved by the APCO, shall be exempt from offset requirements for all air pollutants provided all of the following conditions are met:
- 4.6.8.1 There shall be no increase in the physical or operational design of the existing facility, except for those changes to the design needed for the installation or modification of the emission control technique itself;
  - 4.6.8.2 There shall be no increase in the permitted rating or permitted operating schedule of the permitted unit;
  - 4.6.8.3 There shall be no increase in emissions from the stationary source that will cause or contribute to any violation of a National Ambient Air Quality Standard, Prevention of Significant Deterioration increment, or Air Quality Related Value in Class I areas; and
  - 4.6.8.4 The project shall not result in an increase in permitted emissions or potential to emit of more than 25 tons per year of NO<sub>x</sub>, or 25 tons per year of VOC, or 15 tons per year of SO<sub>x</sub>, or 15 tons per year of PM-10, or 50 tons per year of CO.

Since each of the above-listed criteria is met, offsets are not required for any pollutant.

### **2. Quantity of Offsets Required**

As seen above, the project meets the exemption requirements of section 4.6.8 of District Rule 2201; therefore offset calculations are not necessary and offsets are not required for this project.

## C. Public Notification

### 1. Applicability

Public noticing is required for:

- a. Any new Major Source, which is a new facility that is also a Major Source,
- b. Major Modifications,
- c. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
- d. Any project which results in the offset thresholds being surpassed, and/or
- e. Any project with an SSIPE of greater than 20,000 lb/year for any pollutant.

#### a. New Major Source

This facility is an existing facility and is not a new facility. Therefore public noticing is not required for New Major Source purposes.

#### b. Major Modification

As demonstrated in VII.C.7, this project constitutes a Major Modification; therefore, public noticing for Major Modification purposes is required.

#### c. PE > 100 lb/day

Applications which include a new emissions unit with a PE greater than 100 pounds during any one day for any pollutant will trigger public noticing requirements. There are no new emissions units associated with this project; therefore public noticing is not required for this project for Potential to Emit exceeding the 100 lb/day limit.

#### d. Offset Threshold

Public notification is required if the Pre-Project Stationary Source Potential to Emit (SSPE1) is increased from a level below the offset threshold to a level exceeding the emissions offset threshold, for any pollutant.

There is no increase in permitted emissions as a result of this project. Therefore, the SSPE is not increasing with this project and an offset threshold cannot be surpassed as a result of this project. A public notice will not be required for offset threshold purposes.

#### e. SSIPE > 20,000 lb/year

An SSIPE exceeding 20,000 pounds per year for any one pollutant triggers public notice, where  $SSIPE = SSPE2 - SSPE1$ .

There is no increase in permitted emissions as a result of this project. As a result, SSPE is not increasing with this project. Therefore, the SSIPE is zero for all pollutants and public notice will not be required for SSIPE purposes.

### 2. Public Notice Action

As discussed above, public notice will be required for this project.

#### D. Daily Emission Limits (DELs)

Daily Emissions Limitations (DELs) and other enforceable conditions are required by Section 3.15 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. Per Sections 3.15.1 and 3.15.2, the DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

##### All units:

- During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201]
- The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201]

##### C-311-27, '42, '43, '45, '46, '47, '48, '49, '50, '51, '52, '53, '55, '56, '114, and '117:

- Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: XX.X lb-NOx/day, XXX lb-NOx/yr, XX.X lb-CO/day, and XXX lb-CO/yr. [District Rules 2201, 4305, 4306, and 4320]
- Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 9 ppmvd NOx @ 3% O2 or 0.011 lb-NOx/MMBtu or 50 ppmvd CO @ 3% O2 or 0.037 lb-CO/MMBtu. [District Rules 2201, 4305, 4306, and 4320]

##### C-311-19-17:

- Emissions from the steam generator shall not exceed any of the following limits: 0.022 lb-PM10/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201 and 4320]
- Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 15 ppmvd NOx @ 3% O2 or 0.018 lb-NOx/MMBtu or 50 ppmvd CO @ 3% O2 or 0.037 lb-CO/MMBtu. [District Rules 2201, 4305, 4306, and 4320]
- During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201]

##### C-311-19-16, '20, '21, '22, '23, '25, '28, '30, '36, '37, '38, '39, '40, '41, '76, and '84:

- Emissions from the steam generator shall not exceed any of the following limits: X.XX lb-PM10/MMBtu, or X.XX lb-VOC/MMBtu. [District Rule 2201]
- Except during startup, shutdown and the shakedown period, emissions shall not exceed any of the following limits when this unit is burning 50% or greater by volume PUC quality gas on a monthly average basis: 9 ppmvd NOx @ 3% O2 or 0.011 lb-NOx/MMBtu and XX ppmvd CO @ 3% O2 or X.XX lb-CO/MMBtu. [District Rule 2201, 4305, 4306, and 4320]

- Except during startup, shutdown and the shakedown period, emissions shall not exceed any of the following limits when the unit is burning less than 50% by volume PUC quality gas on a monthly average basis: 12 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.014 lb-NO<sub>x</sub>/MMBtu and XX ppmvd CO @ 3% O<sub>2</sub> or X.XX lb-CO/MMBtu. [District Rule 2201, 4305, 4306, and 4320]

All units except C-311-27, '-36, '-37, '-38, '-39, '-40, '-41, '-51, '-114, and '-117:

- Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: XX.X lb-NO<sub>x</sub>/day, XXX lb-NO<sub>x</sub>/yr, XX.X lb-CO/day, and XXX lb-CO/yr. [District Rules 2201, 4305, 4306, and 4320]
- Emissions from the steam generator shall not exceed any of the following limits: X.XXX lb-PM<sub>10</sub>/MMBtu, or X.XXX lb-VOC/MMBtu. [District Rules 2201 and 4320]

C-311-27, '-114, and '-117:

- Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: XX.X lb-NO<sub>x</sub>/day, XXX lb-NO<sub>x</sub>/yr, XX.X lb-CO/day, and XXX lb-CO/yr. [District Rules 2201, 4305, 4306, and 4320]
- Emissions from the steam generator shall not exceed any of the following limits: **0.00285 lb-SO<sub>x</sub>/MMBtu**, X.XXX lb-PM<sub>10</sub>/MMBtu, or X.XXX lb-VOC/MMBtu. [District Rules 2201]

C-311-51:

- Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: XX.X lb-NO<sub>x</sub>/day, XXX lb-NO<sub>x</sub>/yr, XX.X lb-CO/day, and XXX lb-CO/yr. [District Rules 2201, 4305, 4306, and 4320]
- Emissions from the steam generator shall not exceed any of the following limits: **0.003 lb-SO<sub>x</sub>/MMBtu**, X.XXX lb-PM<sub>10</sub>/MMBtu, or X.XXX lb-VOC/MMBtu. [District Rules 2201 and 4320]

C-311-36, '-37, '-38, '-39, '-40, '-41 (scrubbed units):

- Whenever well casing vapors and/or tank vapor recovery gas are being burned in this unit, the SO<sub>2</sub> scrubber shall operate and shall reduce SO<sub>2</sub> emissions by 95% by weight, or shall limit exhaust SO<sub>2</sub> to less than or equal to 9 ppmv corrected to 3.0% oxygen. [District Rules 2201 and 4320]
- PUC quality gas shall be combusted in this unit whenever the scrubber is not being operated. [District Rules 2201 and 4320]
- Emissions from the steam generator shall not exceed any of the following limits: **0.052 lb-SO<sub>x</sub>/MMBtu**, X.XXX lb-PM<sub>10</sub>/MMBtu, or X.XXX lb-VOC/MMBtu. [District Rule 2201]
- Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: XX.X lb-NO<sub>x</sub>/day, XXX lb-NO<sub>x</sub>/yr, XX.X lb-CO/day, and XXX lb-CO/yr. [District Rules 2201, 4305, 4306, and 4320]

## **E. Compliance Assurance**

### **1. Source Testing**

This unit is subject to District Rule 4305, *Boilers, Steam Generators and Process Heaters, Phase 2*, District Rule 4306, *Boilers, Steam Generators and Process*

*Heaters, Phase 3, and District Rule 4320, Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5 MMBtu/hr.* Source testing requirements, in accordance with District Rules 4305, 4306, and 4320 have been included on the ATC.

## **2. Monitoring**

As required by District Rule 4305, *Boilers, Steam Generators and Process Heaters, Phase 2*, District Rule 4306, *Boilers, Steam Generators and Process Heaters, Phase 3*, and District Rule 4320, *Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5 MMBtu/hr*, this unit is subject to monitoring requirements. Monitoring requirements, in accordance with District Rules 4305, 4306, and 4320 have been included on the ATC.

The following condition will be included on the ATCs to ensure compliance:

- Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201]

## **3. Recordkeeping**

As required by District Rule 4305, *Boilers, Steam Generators and Process Heaters, Phase 2*, District Rule 4306, *Boilers, Steam Generators and Process Heaters, Phase 3*, and District Rule 4320, *Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5 MMBtu/hr* this unit is subject to recordkeeping requirements. Recordkeeping requirements, in accordance with District Rules 4305, 4306, and 4320 have been included on the ATC.

For all units:

- Copies of all gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted, fuel source, and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.4.2]

## **4. Reporting**

No reporting is required to demonstrate compliance with Rule 2201.

### **District Rule 2520 Federally Mandated Operating Permits**

Chevron USA, Inc. has a Title V permit. The changes authorized by these ATCs constitute a minor modification of their Title V permit. As discussed above, the facility has applied for a Certificate of Conformity (COC); therefore, the facility must apply to modify their Title V permit with an administrative amendment prior to operating with the proposed modifications and permit conditions will be listed as follows:

- {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201]

- {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520]

### **District Rule 4001 New Source Performance Standards**

This rule incorporates NSPS from Part 60, Chapter 1, Title 40, Code of Federal Regulations (CFR); and applies to all new sources of air pollution and modifications of existing sources of air pollution listed in 40 CFR Part 60. 40 CFR Part 60, Subpart Dc applies to Small Industrial-Commercial-Industrial Steam Generators between 10 MMBtu/hr and 100 MMBtu/hr (post-6/9/89 construction, modification or, reconstruction)

40 CFR Part 60, Subpart A, section 14, defines the meaning of modification to which the standards are applicable. §60.14, paragraph (e)(5) states that the following will not be considered as a modification: *"the addition or use of any system or device whose primary function is the reduction of air pollutants, except when an emission control system is removed or replaced by a system which the Administrator determines to be less environmentally beneficial"*.

No newly constructed or reconstructed units are proposed in this project, nor are the units being modified (as defined above). Since the permittee is retrofitting some units with an equivalent size, or smaller, burner or FGR for compliance with District rules and regulations, the requirements of these sections do not apply to these units.

### **District Rule 4101 Visible Emissions**

District Rule 4101, Section 5.0, indicates that no air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour, which is dark or darker than Ringelmann 1 or equivalent to 20% opacity. The following condition will be listed on the permit:

- {15} No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]

Therefore, compliance with District Rule 4101 requirements is expected.

### **District Rule 4102 Nuisance**

Section 4.0 prohibits discharge of air contaminants, which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. Therefore, compliance with this rule is expected. The following condition will be listed on the permit:

- {98} No air contaminant shall be released into the atmosphere, which causes a public nuisance. [District Rule 4102]

### **California Health & Safety Code 41700 (Health Risk Assessment)**

District Policy APR 1905 - Risk Management Policy for Permitting New and Modified Sources specifies that for an increase in emissions associated with a proposed new source or

modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

Since the applicant is not proposing an increase in emissions with this project, a health risk assessment is not necessary and no further risk analysis is required.

**District Rule 4201 Particulate Matter Concentration**

Section 3.1 prohibits discharge of dust, fumes, or total particulate matter into the atmosphere from any single source operation in excess of 0.1 grain per dry standard cubic foot. The worst case emissions unit will be used for this calculation (C-311-21 @ 0.08 lb-PM<sub>10</sub>/MMBtu).

F-Factor for NG: 8,578 dscf/MMBtu at 60 °F  
 PM10 Emission Factor: 0.0490 lb-PM10/MMBtu  
 Percentage of PM as PM10 in Exhaust: 100%  
 Exhaust Oxygen (O<sub>2</sub>) Concentration: 3%  
 Excess Air Correction to F Factor =  $\frac{20.9}{(20.9 - 3)} = 1.17$

$$GL = \left( \frac{0.08 \text{ lb-PM}}{\text{MMBtu}} \times \frac{7,000 \text{ grain}}{\text{lb-PM}} \right) / \left( \frac{8,578 \text{ ft}^3}{\text{MMBtu}} \times 1.17 \right)$$

$GL = 0.06 \text{ grain/dscf} < 0.1 \text{ grain/dscf}$

Therefore, compliance with District Rule 4201 requirements is expected and the following condition will be listed on the permit:

- 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]

**District Rule 4301 Fuel Burning Equipment**

This rule specifies maximum emission rates in lb/hr for SO<sub>2</sub>, NO<sub>2</sub>, and combustion contaminants (defined as total PM in Rule 1020). This rule also limits combustion contaminants to ≤ 0.1 gr/scf. According to AP 42 (Table 1.4-2, footnote c), all PM emissions from natural gas combustion are less than 1 μm in diameter.

District Rule 4301 Limits (lb/hr)			
Pollutant	NO <sub>2</sub>	Total PM	SO <sub>2</sub>
Worst case pollutants (lb/hr)	0.88@0.014 lb/MMBtu	4.68@0.08 lb/MMBtu	3.04@.052 lb/MMBtu
Rule Limit (lb/hr)	140	10	200

The above table indicates compliance with the maximum lb/hr emissions in this rule; therefore, continued compliance is expected.

## **District Rule 4304 Equipment Tuning Procedure for Boilers, Steam Generators and Process Heaters**

Pursuant to District Rules 4305 and 4306, Section 6.3.1, the steam generators are not required to tune since it follows District approved Alternate Monitoring scheme A, where the applicable emission limits are periodically monitored. Therefore, the units are not subject to this rule.

## **District Rule 4305 Boilers, Steam Generators and Process Heaters – Phase 2**

These units are natural gas-fired with a maximum heat input of 58.5 - 62.5 MMBtu/hr. Pursuant to Section 2.0 of District Rule 4305, the units are subject to District Rule 4305, *Boilers, Steam Generators and Process Heaters – Phase 2*. In addition, these units are also subject to District Rule 4306, *Boilers, Steam Generators and Process Heaters – Phase 3*.

Since the emissions limits of District Rule 4306 and all other requirements are equivalent or more stringent than District Rule 4305 requirements, compliance with District Rule 4306 requirements will satisfy the requirements of District Rule 4305.

## **District Rule 4306 Boilers, Steam Generators and Process Heaters – Phase 3**

### All units except C-311-19-17:

These units are natural gas-fired with a maximum heat input of 58.5 - 62.5 MMBtu/hr. Pursuant to Section 2.0 of District Rule 4306, these units are subject to District Rule 4306. In addition, these units are also subject to *District Rule 4320, Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5 MMBtu/hr.*

Since the emissions limits of District Rule 4320 and all other requirements are equivalent or more stringent than District Rule 4306 requirements, compliance with District Rule 4320 requirements will satisfy the requirements of District Rule 4306.

### C-311-19-17:

The units have a maximum heat input of 58.5 MMBtu/hr. Pursuant to Section 2.0 of District Rule 4306, the unit is subject to District Rule 4306. This unit is also subject to Rule 4320; therefore, the following conditions will reference this rule as well as this modification will be discussed in that rule.

This discussion pertains to ATCs C-311-55-15 and '-56-14 only as ATCs C-311-55-16, '-55-17, '-56-15, and '-56-16 (limited by permit condition to be implemented concurrently with or after '-55-15 and '-56-14) are subject to District Rule 4320, *Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr.*

## **Section 5.1, NO<sub>x</sub> and CO Emissions Limits**

Section 5.1.1 requires that except for units subject to Sections 5.2, NO<sub>x</sub> and carbon monoxide (CO) emissions shall not exceed the limits specified in the following table. All ppmv emission limits specified in this section are referenced at dry stack gas conditions

and 3.00 percent by volume stack gas oxygen. Emission concentrations shall be corrected to 3.00 percent oxygen in accordance with Section 8.1.

With a maximum heat input of 58.5 MMBtu/hr, the applicable emission limit category is listed in Section 5.1.1, Table 1, Category C, from District Rule 4306.

Rule 4306 Emissions Limits				
Category	Operated on gaseous fuel		Operated on liquid fuel	
	NO <sub>x</sub> Limit	CO Limit	NO <sub>x</sub> Limit	CO Limit
C. Oilfield Steam Generators	15 ppmv or 0.018 lb/MMBtu	400 ppmv	40 ppmv or 0.052 lb/MMBtu	400 ppmv

For the unit:

- the proposed NO<sub>x</sub> emission factor is 15 ppmvd @ 3% O<sub>2</sub> (0.018 lb/MMBtu), and
- the proposed CO emission factor is 50 ppmvd @ 3% O<sub>2</sub> (0.037 lb/MMBtu).

Therefore, compliance with Section 5.1 of District Rule 4306 is expected.

A permit condition listing the emissions limits will be listed on permit as shown in the preceding DEL section.

### Section 5.2, Low Use

The unit annual heat input will exceed the 9 billion Btu heat input per calendar year criteria limit addressed by this section. Since the unit is not subject to Section 5.2, the requirements of this section do not apply to the unit.

### Section 5.3, Startup and Shutdown Provisions

Section 5.3 states that on and after the full compliance schedule specified in Section 7.1, the applicable emission limits of Sections 5.1, 5.2.2 and 5.2.3 shall not apply during start-up or shutdown provided an operator complies with the requirements specified in Sections 5.3.1 through 5.3.4.

BPC has proposed to retain existing start-up and shutdown provisions for the steam generator. Therefore, the following conditions will be listed on the proposed permit to ensure compliance:

- Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods exceeding 2 hours. [District Rule 2201, 4305, 4306, and 4320]
- Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control

system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320]

## Section 5.4, Monitoring Provisions

Section 5.4.2 requires that permit units subject to District Rule 4306, Section 5.1 emissions limits shall either install and maintain Continuous Emission Monitoring (CEM) equipment for NO<sub>x</sub>, CO and O<sub>2</sub>, or install and maintain APCO-approved alternate monitoring.

In order to satisfy the requirements of District Rule 4306, the applicant has proposed to use pre-approved alternate monitoring scheme A (pursuant to District Policy SSP-1105), which requires that monitoring of NO<sub>x</sub>, CO, and O<sub>2</sub> exhaust concentrations shall be conducted at least once per month (in which a source test is not performed) using a portable analyzer. The following conditions will be incorporated into the permit in order to ensure compliance with the requirements of the proposed alternate monitoring plan:

- {2935} 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 and 4306]
- {2936} 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 the performing the notification and testing required by this condition. [District Rules 4305 and 4306]
- {2937} 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]
- {2938} 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]

Since the unit is not subject to the requirements listed in Section 5.2.1 or 5.2.2, it is not subject to Section 5.4.3 requirements.

Since the unit is not subject to the requirements of category H (maximum annual heat input between 9 billion and 30 billion Btu/year) listed in Section 5.1.1, it is not subject to Section 5.4.4 requirements.

### **Section 5.5, Compliance Determination**

Section 5.5.1 requires that the operator of any unit shall have the option of complying with either the applicable heat input (lb/MMBtu) emission limits or the concentration (ppmv) emission limits specified in Section 5.1. The emission limits selected to demonstrate compliance shall be specified in the source test proposal pursuant to Rule 1081 (Source Sampling). Therefore, the following condition will be listed on the permit as follows:

- {2976} The source plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306]

Section 5.5.2 requires that 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. 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. Therefore, the following permit condition will be listed on the permit as follows:

- {2972} 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. 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]

Section 5.5.4 requires that for emissions monitoring pursuant to Sections 5.4.2, 5.4.2.1, and 6.3.1 using a portable NO<sub>x</sub> analyzer as part of an APCO approved Alternate Emissions Monitoring System, emission readings 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.

Therefore, the following permit condition will be listed on the permit as follows:

- {2937} 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]

Section 5.5.5 requires that for emissions source testing performed pursuant to Section 6.3.1 for the purpose of determining compliance with an applicable standard or numerical limitation of this rule, the arithmetic average of three (3) 30-consecutive-minute test runs

shall apply. If two (2) of three (3) runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit.

Therefore, the following permit condition will be listed on the permit as follows:

- {2980} 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]

### Section 6.1, Recordkeeping

Section 6.1 requires that the records required by Sections 6.1.1 through 6.1.3 shall be maintained for five calendar years and shall be made available to the APCO upon request. Failure to maintain records or information contained in the records that demonstrate noncompliance with the applicable requirements of this rule shall constitute a violation of this rule.

A permit condition will be listed on the permit as follows:

- {2983} All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320]

Section 6.1.2 requires that the operator of a unit subject to Section 5.2 shall record the amount of fuel use at least on a monthly basis. Since the unit is not subject to the requirements listed in Section 5.2, it is not subject to Section 6.1.2 requirements.

Section 6.1.3 requires that the operator of a unit subject to Section 5.2.1 or 6.3.1 shall maintain records to verify that the required tune-up and the required monitoring of the operational characteristics have been performed. The unit is not subject to Section 6.1.3. Therefore, the requirements of this section do not apply to the unit.

### Section 6.2, Test Methods

Section 6.2 identifies the following test methods as District-approved source testing methods for the pollutants listed:

Pollutant	Units	Test Method Required
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 O <sub>2</sub>	%	EPA Method 3 or 3A, or ARB Method 100
Stack Gas Velocities	ft/min	EPA Method 2
Stack Gas Moisture Content	%	EPA Method 4

The following permit conditions will be listed on the permit as follows:

- Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081]
- 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, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SO<sub>x</sub> (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D3246 or double GC for H<sub>2</sub>S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306, and 4320]

### **Section 6.3, Compliance Testing**

Section 6.3.1 requires that this unit be tested to determine compliance with the applicable requirements of section 5.1 and 5.2.3 not less than once every 12 months. Upon demonstrating compliance on two consecutive compliance source tests, the following source test may be deferred for up to thirty-six months.

The following permit conditions will be listed on the permit as follows:

- {3467} Source testing to measure NO<sub>x</sub> and CO emissions from this unit while fired on natural gas shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320]
- {3466} Source testing to measure NO<sub>x</sub> and CO emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320]
- {110} The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]

In addition, since the applicant has proposed to use pre-approved Alternate Monitoring Scheme "A" using a portable analyzer, the tune-up requirements listed in Section 6.3.1 is not applicable to the steam generator. Section 6.3.1 also requires that, during the 36-month source testing interval, the owner/operator shall monthly monitor the operational characteristics recommended by the unit manufacturer. Since the pre-approved Alternate Monitoring Scheme "A" using a portable analyzer requires monthly monitoring of NO<sub>x</sub>, CO, and O<sub>2</sub> exhaust emissions concentrations, operational characteristics monitoring requirement is satisfied, and no further discussion is required.

### **Section 7.0, Compliance Schedule**

Section 7.0 indicates that an operator with multiple units at a stationary source shall comply with this rule in accordance with the schedule specified in Table 2, Section 7.1 of District Rule 4306.

The unit will be in compliance with the emissions limits listed in table 1, Section 5.1 of this rule, and periodic monitoring and source testing as required by District Rule 4306. Therefore, requirements of the compliance schedule, as listed in Section 7.1 of District Rule 4306, are satisfied. No further discussion is required.

### **Conclusion**

Conditions will be incorporated into the permit in order to ensure compliance with each section of this rule, see attached draft permit(s). Therefore, compliance with District Rule 4306 requirements is expected.

### **District Rule 4320 Advance Emission Reduction Options for Boilers, Steam Generators and Process Heaters Greater than 5 MMBtu/hr**

This rule limits NO<sub>x</sub>, CO, SO<sub>2</sub> and PM<sub>10</sub> emissions from boilers, steam generators and process heaters rated greater than 5 MMBtu/hr. This rule also provides a compliance option of payment of fees in proportion to the actual amount of NO<sub>x</sub> emitted over the previous year.

The units in this project are all rated at greater than 5 MMBtu/hr heat input. Therefore this rule applies.

### **Section 5.1 NO<sub>x</sub> Emission Limits**

Section 5.1 states that an operator of a unit(s) subject to this rule shall comply with all applicable requirements of the rule and one of the following, on a unit-by-unit basis:

- 5.1.1 Operate the unit to comply with the emission limits specified in Sections 5.2 and 5.4; or
- 5.1.2 Pay an annual emissions fee to the District as specified in Section 5.3 and comply with the control requirements specified in Section 5.4; or
- 5.1.3 Comply with the applicable Low-use Unit requirements of Section 5.5.

Section 5.2.1 states that on and after the indicated Compliance Deadline units shall not be operated in a manner which exceeds the applicable NO<sub>x</sub> limit specified in Table 1 of this rule.

With a maximum heat input of 58.5 - 62.5 MMBtu/year for these steam generators the applicable emission limit category Section 5.2, Table 1, Category C.2 (units firing on >50% PUC quality gas) and C.3 (units firing on <50% PUC quality gas), from District Rule 4320 are as follows:

C. Oilfield Steam Generators
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2. Units with a total rated heat input > 20.0 MMBtu/hr	a) Standard Schedule 7 ppmv or 0.008 lb/MMBtu; or	July 1, 2009	July 1, 2010
	b) Staged Enhanced Schedule Initial Limit 9 ppmv or 0.011 lb/MMBtu; and	July 1, 2011	July 1, 2012
	Final Limit 5 ppmv or 0.0062 lb/MMBtu	January 1, 2013	January 1, 2014
3. Units firing on less than 50%, by volume, PUC quality gas.	Staged Enhanced Schedule Initial Limit 12 ppmv or 0.014 lb/MMBtu; and	July 1, 2010	July 1, 2011
	Final Limit 9 ppmv or 0.011 lb/MMBtu	January 1, 2013	January 1, 2014

As shown in the previous table, the 9 and 12 ppmvd @ 3% O<sub>2</sub> NO<sub>x</sub> limit proposed for the steam generators, for staged schedules, in this project are consistent with one of the compliance options allowed by the rule. Additionally, C-311-19-17 will be modified to pay emission fees for NO<sub>x</sub> (no reduction from the Rule 4306 limit).

In order to enjoy the higher NO<sub>x</sub> limit allowed by category C.3 the units must combust less than 50% PUC quality gas. CUSA has proposed a dual NO<sub>x</sub> limit that will allow them to burn both PUC and non-PUC gas by meeting the individual limits. CUSA has indicated that units claiming this higher NO<sub>x</sub> limit have separate lines piped into the steam generators to handle PUC and non-PUC fuel. Therefore, the following conditions will be listed to ensure compliance:

C-311-19-16, '-20, '-21, '-22, '-23, '-25, '-28, '-30, '-36, '-37, '-38, '-39, '-40, '-41, '-76, and '-84:

- Except during startup, shutdown and the shakedown period, emissions shall not exceed any of the following limits when this unit is burning 50% or greater by volume PUC quality gas on a monthly average basis: 9 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.011 lb-NO<sub>x</sub>/MMBtu and 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rule 2201, 4305, 4306, and 4320]
- Except during startup, shutdown and the shakedown period, emissions shall not exceed any of the following limits when the unit is burning less than 50% by volume PUC quality gas on a monthly average basis: 12 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.014 lb-NO<sub>x</sub>/MMBtu and 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rule 2201, 4305, 4306, and 4320]
- The applicable NO<sub>x</sub> and CO emissions concentration for each month shall be determined based on the volume and type of fuel combusted in the unit (< 50% by volume PUC quality gas or >= 50% by volume PUC quality gas). Permittee shall maintain supporting records that demonstrate the type of fuel combusted. [District Rule 2201 and 4320]

- Fuel H<sub>2</sub>S, total sulfur, and methane content shall be determined semi-annually using the following test methods H<sub>2</sub>S: ASTM D6228; total sulfur: ASTM D1072; ASTM D3246, or ASTM D6228; and methane content: ASTM D1945. [District Rule 4320]
- PUC quality natural gas is any gaseous fuel where the sulfur content is no more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet, no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet, and at least 80% methane by volume. [District Rule 4320]

**C-311-19-16:**

- Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 15 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.018 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rules 2201, 4305, 4306, and 4320]

**C-311-27, '-42, '-43, '-44, '-45, '-46, '-47, '-48, '-49, '-50, '-51, '-52, '-53, '-55, '-114, and '-117:**

- Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 9 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.011 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rule 2201, 4305, 4306, and 4320]
- Fuel H<sub>2</sub>S, total sulfur, and methane content shall be determined semi-annually using the following test methods H<sub>2</sub>S: ASTM D6228; total sulfur: ASTM D1072; ASTM D3246, or ASTM D6228; and methane content: ASTM D1945. [District Rule 4320]

**Section 5.4 Particulate Matter Control Requirements**

5.4.1 To limit particulate matter emissions, an operator shall comply with one of the following requirements:

- 5.4.1.1 On and after the applicable NO<sub>x</sub> Compliance Deadline specified in Section 5.2 Table 1, operators shall fire units exclusively on PUC-quality natural gas, commercial propane, butane, or liquefied petroleum gas, or a combination of such gases;
- 5.4.1.2 On and after the applicable NO<sub>x</sub> Compliance Deadline specified in Section 5.2 Table 1, operators shall limit fuel sulfur content to no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet; or
- 5.4.1.3 On and after the applicable NO<sub>x</sub> Compliance Deadline specified in Section 5.2 Table 1, operators shall install and properly operate an emission control system that reduces SO<sub>2</sub> emissions by at least 95% by weight; or limit exhaust SO<sub>2</sub> to less than or equal to 9 ppmv corrected to 3.0% O<sub>2</sub>.
- 5.4.1.4 Notwithstanding the compliance deadlines indicated in Sections 5.4.1.1 through 5.4.1.3, refinery units, which require modification of refinery equipment to reduce sulfur emissions, shall be in compliance with the applicable requirement in Section 5.4.1 no later than July 1, 2013.

CUSA will address the particulate matter in the following manner (conditions previously proposed in the Rule 2201 compliance section VIII.D):

For all units except C-311-27, '-36, '-37, '-38, '-39, '-40, '-41, '-51, '-114, and '-117:

- Emissions from the steam generator shall not exceed any of the following limits: X.XXX lb-PM10/MMBtu, or X.XXX lb-VOC/MMBtu. [District Rules 2201]
- Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rule 4320]

C-311-27, '-114, and '-117:

- Emissions from the steam generator shall not exceed any of the following limits: **0.00285 lb-SOx/MMBtu**, X.XXX lb-PM10/MMBtu, or X.XXX lb-VOC/MMBtu. [District Rules 2201 and 4320]

C-311-51:

- Emissions from the steam generator shall not exceed any of the following limits: **0.003 lb-SOx/MMBtu**, X.XXX lb-PM10/MMBtu, or X.XXX lb-VOC/MMBtu. [District Rules 2201 and 4320]

C-311-36, '-37, '-38, '-39, '-40, '-41 (scrubbed units):

- Whenever well casing vapors and/or tank vapor recovery gas are being burned in this unit, the SO<sub>2</sub> scrubber shall operate and shall reduce SO<sub>2</sub> emissions by 95% by weight, or shall limit exhaust SO<sub>2</sub> to less than or equal to 9 ppmv corrected to 3.0% oxygen. [District Rules 2201 and 4320]
- PUC quality gas shall be combusted in this unit whenever the scrubber is not being operated. [District Rules 2201 and 4320]
- Emissions from the steam generator shall not exceed any of the following limits: **0.052 lb-SOx/MMBtu**, X.XXX lb-PM10/MMBtu, or X.XXX lb-VOC/MMBtu. [District Rule 2201]

## **Section 5.6 Startup and Shutdown Provisions**

Section 5.6 states that on and after the full compliance deadline specified in Section 5.0, the applicable emission limits of Sections 5.2 Table 1 and 5.5.2 shall not apply during start-up or shutdown provided an operator complies with the requirements specified in Sections 5.6.1 through 5.6.5.

CUSA has proposed to retain existing start-up and shutdown duration limits of 2 hours and 2 hours, respectively. Emissions during start-up and shutdown will not be subject to the emission limits in Sections 5.2 and 5.2.2. The following conditions will be listed on the ATCs:

- Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 4305, 4306, and 4320]
- Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320]

## Section 5.7 Monitoring Provisions

Section 5.7.1 requires that permit units subject to District Rule 4320, Section 5.2 shall both install and maintain an operational APCO approved Continuous Emission Monitoring System (CEMS) for NO<sub>x</sub>, CO and O<sub>2</sub>, or implement an APCO-approved alternate monitoring.

Consistent with current permit requirements, CUSA proposes to continue operating under Alternate Monitoring Scheme A (pursuant to District Policy SSP-1105), which requires that monitoring of NO<sub>x</sub>, CO, and O<sub>2</sub> exhaust concentrations shall be conducted at least once per month (in which a source test is not performed) using a portable analyzer. The following conditions will be incorporated into the ATCs to ensure compliance with the requirements of the proposed alternate monitoring plan:

- {4063} 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 analyzer 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]
- {4064} 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 the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320]
- {4065} 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]
- {4066} 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 by volume 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, 4306 and 4320]

Section 5.7.6 requires operators complying with Sections 5.4.1.1 or 5.4.1.2 to provide an annual fuel analysis to the District unless a more frequent sampling and reporting period is included in the Permit To Operate. Sulfur analysis shall be performed in accordance with the

test methods in Section 6.2 (all base documents contain conditions requiring at least annual fuel sulfur analysis).

Since existing conditions requires sampling no less than semi-annually, they are more stringent than Rule 4320. Therefore, the rule references for these conditions will be updated to include Rule 4320.

- 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 Rules 2520, 9.3.2 and 4320]

The following condition will be listed to enforce the reporting requirement of Sections 5.4.1.1 and 5.4.1.2:

All units except C-311-36, '-37, '-38, '-39, '-40, '-41:

- All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320]

Operators complying with Section 5.4.1.3 are required to perform an annual source test for SO<sub>x</sub> emissions

C-311-36, '-37, '-38, '-39, '-40, '-41 (scrubbed units):

- Source testing to measure SO<sub>x</sub> emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. [District Rule 4320]

### **Section 5.8 Compliance Determination**

Section 5.8.1 requires that the operator of any unit shall have the option of complying with either the applicable heat input (lb/MMBtu), emission limits or the concentration (ppmv) emission limits specified in Section 5.2. The emission limits selected to demonstrate compliance shall be specified in the source test proposal pursuant to Rule 1081 (Source Sampling).

Therefore, the following condition will be listed on the ATCs as follows:

- {2976} The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320]

Section 5.8.2 requires that 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. 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. Therefore, the following permit condition will be listed on the ATCs as follows:

- {2972} 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. 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]

Section 5.8.4 requires that for emissions monitoring pursuant to Sections 5.7.1 and 6.3.1 using a portable NO<sub>x</sub> analyzer as part of an APCO approved Alternate Emissions Monitoring System, emission readings 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. Therefore, the following previously listed permit condition will be on the ATCs as follows:

- {2937} 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]

Section 5.8.5 requires that for emissions source testing performed pursuant to Section 6.3.1 for the purpose of determining compliance with an applicable standard or numerical limitation of this rule, the arithmetic average of three (3) 30-consecutive-minute test runs shall apply. If two (2) of three (3) runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. Therefore, the following permit condition will be listed on the permit as follows:

- {2980} 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]

### **Section 6.1 Recordkeeping**

Section 6.1 requires that the records required by Sections 6.1.1 through 6.1.5 shall be maintained for five calendar years and shall be made available to the APCO and EPA upon request. Failure to maintain records or information contained in the records that demonstrate noncompliance with the applicable requirements of this rule shall constitute a violation of this rule.

A condition will be listed on the ATCs as follows:

- {2983} All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306 and 4320]

### Section 6.2, Test Methods

Section 6.2 identifies the following test methods as District-approved source testing methods for the pollutants listed:

Pollutant	Units	Test Method Required
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 O <sub>2</sub>	%	EPA Method 3 or 3A, or ARB Method 100
Stack Gas Velocities	ft/min	EPA Method 2
Stack Gas Moisture Content	%	EPA Method 4

Conditions will be listed on the ATCs as follows:

- {109} 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]
- 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, Stack Gas Velocity (ft/min) – EPA Method 2, Stack Gas Moisture Content (%) – EPA Method 4, SO<sub>x</sub> (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D3246 or double GC for H<sub>2</sub>S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306 and 4320]

### Section 6.3, Compliance Testing

Section 6.3.1 requires that this unit be tested to determine compliance with the applicable requirements of section 5.1 and 5.2.3 not less than once every 12 months. Upon demonstrating compliance on two consecutive compliance source tests, the following source test may be deferred for up to thirty-six months. The following permit conditions will be listed on the ATCs:

C-311-19, '-20, '-21, '-22, '-23, '-25, '-28, '-30, '-36, '-37, '-38, '-39, '-40, '-41, '-76, and '-84:

- A source test to demonstrate compliance with NO<sub>x</sub> and CO emission limits shall be performed within 60 days of startup of this unit. The NO<sub>x</sub> limit in effect at the time of the startup source testing will be determined based on the volume and type of fuel combusted (>= 50% PUC quality or < 50% PUC quality gas) and shall be identified in the source test protocol. Whenever the fuel type is switched from the fuel type combusted during the initial startup of this unit, compliance source testing for NO<sub>x</sub> and CO shall be conducted within 90 days of the date the fuel type is switched. [District Rules 2201 and 4320]
- Source testing is required at least once every twelve (12) months from the initial source test date of each fuel type (>= 50% PUC quality gas or < 50% PUC quality gas). After an initial compliance demonstration with the NO<sub>x</sub> and CO emission limits for each fuel type on two (2)

consecutive source tests, the unit shall be tested not less than once every thirty-six (36) months from the last test date for that fuel type. Testing shall not be required for any fuel type not in use during the 36 month period until such time the fuel type is switched, after which testing shall be performed within 90 days of switching fuel types. [District Rules 2201 and 4320]

- Compliance source testing after switching fuel types is not required if the unit continues to demonstrate compliance with 9 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.011 lb-NO<sub>x</sub>/MMBtu and 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu while firing on less than 50% by volume PUC quality gas. In which case, source testing shall only be required every thirty-six(36) months for the less than 50% by PUC quality gas. If the result of a source test demonstrates that the unit does not meet 9 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.011 lb-NO<sub>x</sub>/MMBtu and 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu while firing on less than 50% by volume PUC quality gas, the source test frequency shall revert to at least one test every 36 months for each fuel type. [District Rules 2201 and 4320, 6.3.1]
- The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]

C-311-27, '-42, '-43, '-44, '-45, '-46, '-47, '-48, '-49, '-50, '-51, '-52, '-53, '-55, '-114, and '-117:

- Source testing to measure NO<sub>x</sub> and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320]
- Source testing to measure 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 Rules 4305, 4306, and 4320]
- The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]

In addition, since the applicant has proposed to use pre-approved Alternate Monitoring Scheme "A" using a portable analyzer, the tune-up requirements listed in Section 6.3.1 are not applicable to these units. Section 6.3.1 also requires that, during the 36-month source testing interval, the owner/operator shall monthly monitor the operational characteristics recommended by the unit manufacturer. Since the pre-approved Alternate Monitoring Scheme "A" using a portable analyzer requires monthly monitoring of NO<sub>x</sub>, CO, and O<sub>2</sub> exhaust emissions concentrations, operational characteristics monitoring requirement is satisfied, and no further discussion is required.

### **Section 7.0, Compliance Schedule**

Section 7.0 identifies the dates by which the operator shall submit an application for an ATC and the date by which the owner shall demonstrate compliance with this rule.

The units will be in compliance with the emissions limits listed in Table 1, Section 5.2 of this rule, and periodic monitoring and source testing as required by District Rule 4320. Therefore, requirements of the compliance schedule, as listed in Section 7.0 of District Rule 4320, are satisfied. No further discussion is required.

## Conclusion

Conditions will be incorporated into the permit in order to ensure compliance with each section of this rule, see attached draft permits in Appendix B. Therefore, compliance with District Rule 4320 requirements is expected.

## District Rule 4801 Sulfur Compounds

A person shall not discharge into the atmosphere sulfur compounds, which would exist as a liquid or gas at standard conditions, exceeding in concentration at the point of discharge: 0.2 % by volume calculated as SO<sub>2</sub>, on a dry basis averaged over 15 consecutive minutes. Using the ideal gas equation and the emission factors presented in Section VII, the sulfur compound emissions are calculated as follows:

$$\text{Volume SO}_2 = \frac{nRT}{P}$$

With:

N = moles SO<sub>2</sub>

T (Standard Temperature) = 60°F = 520°R

P (Standard Pressure) = 14.7 psi

R (Universal Gas Constant) =  $\frac{10.73 \text{ psi} \cdot \text{ft}^3}{\text{lb} \cdot \text{mol} \cdot ^\circ\text{R}}$

$$\frac{0.052 \text{ lb} - \text{SO}_x}{\text{MMBtu}} \times \frac{\text{MMBtu}}{8,578 \text{ dscf}} \times \frac{1 \text{ lb} \cdot \text{mol}}{64 \text{ lb}} \times \frac{10.73 \text{ psi} \cdot \text{ft}^3}{\text{lb} \cdot \text{mol} \cdot ^\circ\text{R}} \times \frac{520^\circ\text{R}}{14.7 \text{ psi}} \times \frac{1,000,000 \cdot \text{parts}}{\text{million}} = 36.0 \frac{\text{parts}}{\text{million}}$$

$$\text{Sulfur Concentration} = 36.0 \frac{\text{parts}}{\text{million}} < 2,000 \text{ ppmv (or 0.2\%)}$$

Therefore, compliance with District Rule 4801 requirements is expected.

## California Health & Safety Code 42301.6 (School Notice)

This facility is not located within 1,000 feet of a school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

## California Environmental Quality Act (CEQA)

### Greenhouse Gas Significance Determination

The District's engineering evaluation (this document) demonstrates that the project would not result in an increase in project specific greenhouse gas emissions. The District therefore concludes that the project would have a less than cumulatively significant impact on global climate change.

### District CEQA Findings

The California Environmental Quality Act (CEQA) requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA

Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The San Joaquin Valley Unified Air Pollution Control District (District) adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities.
- Identify the ways that environmental damage can be avoided or significantly reduced.
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

The District performed an Engineering Evaluation (this document) for the proposed project and determined that the activity will occur at an existing facility and the project involves negligible expansion of the existing use. Furthermore, the District determined that the activity will not have a significant effect on the environment. The District finds that the activity is categorically exempt from the provisions of CEQA pursuant to CEQA Guideline § 15031 (Existing Facilities), and finds that the project is exempt per the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment (CEQA Guidelines §15061(b)(3)).

#### IX. RECOMMENDATION

Compliance with all applicable rules and regulations is expected. Pending a successful NSR Public Noticing period, issue Authorities to Construct subject to the permit conditions on the attached draft Authorities to Construct in Appendix B.

#### X. BILLING INFORMATION

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
C-311-30	3020-02-H	62.5 MMBtu/hr	\$1,030.00
C-311-114, -117	3020-02-H	23.0 MMBtu/hr	\$1,030.00
All other units	3020-02-H	58.5 MMBtu/hr	\$1,030.00

#### Appendices

- Appendix A: Current Base Documents  
 Appendix B: Draft ATCs  
 Appendix C: TVFORM-009

# Appendix A

## Current Base Documents

2025-01-15 10:00:00 AM

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**DRAFT**

PERMIT NO: C-311-19-14

ISSUANCE DATE: 01/25/2010

LEGAL OWNER OR OPERATOR: CHEVRON USA INC  
MAILING ADDRESS: PO BOX 1392  
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION  
FRESNO COUNTY, CA

SECTION: 13 TOWNSHIP: 20S RANGE: 14E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 58.5 MMBTU/HR SG 13-03 THERMOTICS STEAM GENERATOR, MODEL 5G-50-NDS-15, WITH NORTH AMERICAN GAS BURNER, MODEL 6131G-LO-NOX WITH FLUE GAS RECIRCULATION AND O2 CONTROLLER:INSTALL NORTH AMERICAN LOW-NOX BURNER, LIMIT NOX TO 9 PPM @ 3% O2, AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. The permittee shall notify the District at least seven calendar days prior to the designation of this permit unit as a dormant emissions unit or an active emissions unit. [District Rule 1070] Federally Enforceable Through Title V Permit
4. When designated as a dormant emissions unit the fuel supply line shall be physically disconnected from the emissions unit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
5. When designated as a dormant emissions unit, the permittee shall not be required to perform source testing or monitoring requirements otherwise required by this permit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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

**DRAFT**

DAVID WARNER, Director of Permit Services  
C-311-19-14: Apr 22 2010 8:35AM - RICKARDK : Joint Inspection NOT Required

6. A source test to demonstrate compliance with the NO<sub>x</sub> and CO emission limits shall be performed within 60 days of recommencing operation of the dormant emissions unit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
7. This unit shall be fired on natural gas, or a blend of natural gas and well casing and tank vapor recovery (TVR) gas. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rule 4320]
9. The permittee shall install and maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The flue gas recirculation system shall be operated whenever the generator is in use. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total fuel consumption shall not exceed 1,404 MMBtu/day nor 457,800 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. 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
13. Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 140 lb/hr, calculated as NO<sub>2</sub>. [District Rules 4301, 5.2.2, 5.3, and 5.5 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
14. Emissions from the steam generator shall not exceed any of the following limits: 0.0143 lb-SO<sub>x</sub>/MMBtu, 0.022 lb-PM<sub>10</sub>/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
15. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 9 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.011 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
16. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 25.3 lb-NO<sub>x</sub>/day, 5,036 lb-NO<sub>x</sub>/yr, 51.9 lb-CO/day, and 16,939 lb-CO/yr. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
18. Emissions of sulfur compounds from this unit shall not exceed 200 lb/hr, calculated as SO<sub>2</sub>. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit
19. During a shakedown period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO<sub>x</sub> emission rate shall not exceed 15 ppmvd @ 3% O<sub>2</sub> or 0.018 lb/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline. Permittee shall maintain a record of the date of initial operation and shall make such records readily available for District inspection upon request. [District Rule 4320]
20. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

22. 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 Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
23. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
24. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
25. 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
26. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
27. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
28. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081]
29. 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
30. 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, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SO<sub>x</sub> (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D3246 or double GC for H<sub>2</sub>S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
31. Operator shall provide an annual fuel analysis to the District. [District Rule 4320]
32. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

33. Natural gas sulfur content and higher heating value (hhv) shall be certified by a third party fuel supplier of each fuel source or natural gas shall be tested for sulfur content and higher heating value (hhv) monthly. Casing gas shall be tested for sulfur content and higher heating value (hhv) not less than monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
34. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3246, D 4084, or a grab sample analysis by GC-FPD/TCD or double GC for H<sub>2</sub>S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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
35. 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 3246, D 4084, or grab sample analysis by GC-FPD/TCD or 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
36. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2; 4305, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit
37. 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 Rules 2520, 9.3.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
38. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit
39. 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. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
40. 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]
41. 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
42. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit
43. Copies of all , gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted, fuel source, 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
44. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

45. 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), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
46. 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), and 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
47. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c 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

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**DRAFT**

PERMIT NO: C-311-20-17

ISSUANCE DATE: 01/25/2010

LEGAL OWNER OR OPERATOR: CHEVRON USA INC  
MAILING ADDRESS: PO BOX 1392  
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION  
FRESNO COUNTY, CA

SECTION: 13D TOWNSHIP: 20S RANGE: 14E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 58.5 MMBTU/HR NATURAL GAS-FIRED STRUTHERS THERMOFLOOD SG 13-04 STEAM GENERATOR WITH A NORTH AMERICAN GLE LOW-NOX BURNER WITH OXYGEN CONTROLLER: INSTALL OPTIONAL USE FGR, LIMIT NOX TO 9 PPM @ 3% O2, AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This unit shall be fired on PUC-quality natural gas, or a blend of PUC-quality natural gas and well casing and tank vapor recovery (TVR) gas. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rule 4320]
5. Total consumption shall not exceed either of the following limits: 1,404 MMBtu/day nor 457,800 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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

**DRAFT**

DAVID WARNER, Director of Permit Services  
C-311-20-17: Apr 22 2010 8:35AM - RICKARDX : Joint Inspection NOT Required

7. 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
8. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [District Rule 4801] Federally Enforceable Through Title V Permit
9. Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 140 lb/hr, calculated as NO<sub>2</sub>. [District Rules 4301, 5.2.2, 5.3, and 5.5 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. Emissions from the steam generator shall not exceed any of the following limits: 0.0143 lb-SO<sub>x</sub>/MMBtu, 0.004 lb-PM<sub>10</sub>/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
11. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 9 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.011 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
12. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 25.3 lb-NO<sub>x</sub>/day, 5,036 lb-NO<sub>x</sub>/yr, 51.9 lb-CO/day, and 16,939 lb-CO/yr. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
14. Emissions of sulfur compounds from this unit shall not exceed 200 lb/hr, calculated as SO<sub>2</sub>. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit
15. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
16. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. During a shakedown period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO<sub>x</sub> emission rate shall not exceed 15 ppmvd @ 3% O<sub>2</sub> or 0.018 lb/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline. Permittee shall maintain a record of the date of initial operation and shall make such records readily available for District inspection upon request. [District Rule 4320]
18. Operator shall provide an annual fuel analysis to the District. [District Rule 4320]
19. 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 Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

20. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, 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 a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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
21. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
22. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2, 4305, 4306, and 4320] 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, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D3246 or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
24. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
25. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
26. NOx, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
27. 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
28. The results of each source test shall be submitted to the District within 60 days after the source test. [District Rule 1081] Federally Enforceable Through Title V Permit
29. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 2520, 9.3.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

30. 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 the performing the notification and testing required by this condition. [District Rules 2520, 9.3.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
31. 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 2520, 9.3.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
32. 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 2520, 9.3.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
33. Concentration measurements shall not be taken until the sample acquisition probe has been exposed to the stack gas for at least 150% of the response time. Measurements shall be taken in triplicate. [District Rule 2520, 9.3.2, 4305, 4306, and 4320]
34. The well casing gas shall be sampled monthly from the gas line down stream from the point where the casing gas from all 4 casing collection systems is connected together and upstream from the point where the well casing gas is fed to the steam generators. The gas sample shall be analyzed by the laboratory for total sulfur and the results shall be given in grain/100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
35. Permittee shall maintain monthly records of the total amount of well casing gas consumed by the entire bank of steam generators (in MMscf), along with the date and time of the measurement. [District Rule 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
36. Permittee shall maintain monthly records of the total amount of PUC grade gas consumed by the entire bank of steam generators (in MMscf), along with the date and time of the measurement. [District Rule 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
37. Permittee shall maintain records of daily total gas consumption. [District Rule 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
38. Permittee shall maintain records of all lab analyses. [District Rule 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
39. Natural gas sulfur content and higher heating value (hhv) shall be certified by a third party fuel supplier of each fuel source or natural gas shall be tested for sulfur content and higher heating value (hhv) monthly. Casing gas shall be tested for sulfur content and higher heating value (hhv) not less than monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
40. 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. 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, 4306, and 4320] Federally Enforceable Through Title V Permit

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41. 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]
42. 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
43. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit
44. Copies of all , gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted, fuel source, 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
45. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
46. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 1081 (Amended December 16, 1993), 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
47. 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), and 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
48. {1669} This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c 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

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: 01/25/2010

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PERMIT NO: C-311-21-8

LEGAL OWNER OR OPERATOR: CHEVRON USA INC  
MAILING ADDRESS: PO BOX 1392  
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION  
FRESNO COUNTY, CA

SECTION: 13 TOWNSHIP: 20S RANGE: 14

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 58.5 MMBTU/HR SG 13-5 STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE LOW-NOX BURNER: INSTALL OPTIONAL USE FGR, LIMIT NOX TO 9 PPM @ 3% O2, AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Authority to Construct (ATC) C-311-21-6 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
6. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director APCO

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DAVID WARNER, Director of Permit Services

C-311-21-8 : Apr 22 2010 8:35AM - RICKARDK : Joint Inspection NOT Required

7. This unit shall be fired on PUC-quality natural gas, or a blend of PUC-quality natural gas and well casing and tank vapor recovery (TVR) gas. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rule 4320]
9. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Total fuel consumption shall not exceed either of the following limits: 1,404 MMBtu/day nor 457,800 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Emissions from the steam generator shall not exceed any of the following limits: 0.0143 lb-SO<sub>x</sub>/MMBtu, 0.08 lb-PM<sub>10</sub>/MMBtu, or 0.08 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
12. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 9 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.011 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
13. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 25.3 lb-NO<sub>x</sub>/day, 5,036 lb-NO<sub>x</sub>/yr, 51.9 lb-CO/day, and 16,939 lb-CO/yr. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
15. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of each start-up and shutdown period. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
16. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. During a shakedown period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO<sub>x</sub> emission rate shall not exceed 15 ppmvd @ 3% O<sub>2</sub> or 0.018 lb/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline. Permittee shall maintain a record of the date of initial operation and shall make such records readily available for District inspection upon request. [District Rule 4320]
18. Operator shall provide an annual fuel analysis to the District. [District Rule 4320]
19. 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 Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
20. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, 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 a grab sample analysis by GC-FPD/TCD or double GC for H<sub>2</sub>S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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

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21. 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 or 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
22. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
23. 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 Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
24. 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
25. 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, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SO<sub>x</sub> (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D3246 or double GC for H<sub>2</sub>S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
26. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. 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
28. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
29. 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 the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
30. 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

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31. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
32. 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. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
33. 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
34. 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
35. Permittee shall maintain records of higher heating value (h<sub>h</sub>v), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit
36. Copies of all , gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted, fuel source, 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
37. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
38. 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), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
39. 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), and 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
40. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c 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

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: 01/25/2010

PERMIT NO: C-311-22-15

LEGAL OWNER OR OPERATOR: CHEVRON USA INC  
MAILING ADDRESS: PO BOX 1392  
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION  
FRESNO COUNTY, CA

SECTION: 13 TOWNSHIP: 20S RANGE: 14E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 58.5 MMBTU/HR SG 13-06 THERMOTICS STEAM GENERATOR, MODEL 5G-50-NDS-15, WITH A NORTH AMERICAN GLE LOW NOX BURNER, FLUE GAS RECIRCULATION SYSTEM, AND O2 CONTROLLER: LIMIT NOX TO 9 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Authority to Construct (ATC) C-311-22-13 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The permittee shall notify the District at least seven calendar days prior to the designation of this permit unit as a dormant emissions unit or an active emissions unit. [District Rule 1070]
5. When designated as a dormant emissions unit the fuel supply line shall be physically disconnected from the emissions unit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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

C-311-22-15 : Apr 22 2010 8:35AM - RICKARDK : Joint Inspection NOT Required

6. When designated as a dormant emissions unit, the permittee shall not be required to perform source testing or monitoring requirements otherwise required by this permit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
7. A source test to demonstrate compliance with the NO<sub>x</sub> and CO emission limits shall be performed within 60 days of recommencing operation of the dormant emissions unit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
8. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
9. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
10. 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
11. This unit shall be fired on natural gas and/or well casing gas. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rule 4320]
13. Total fuel consumption shall not exceed either of the following limits: 1,404 MMBtu/day nor 457,800 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Emissions from the steam generator shall not exceed any of the following limits: 0.0143 lb-SO<sub>x</sub>/MMBtu, 0.022 lb-PM<sub>10</sub>/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
16. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 9 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.011 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 25.3 lb-NO<sub>x</sub>/day, 5,036 lb-NO<sub>x</sub>/yr, 51.9 lb-CO/day, and 16,939 lb-CO/yr. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. Operator shall provide an annual fuel analysis to the District. [District Rule 4320]
20. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
22. During a shakedown period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO<sub>x</sub> emission rate shall not exceed 15 ppmvd @ 3% O<sub>2</sub> or 0.018 lb/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline. Permittee shall maintain a record of the date of initial operation and shall make such records readily available for District inspection upon request. [District Rule 4320]

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23. 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 Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
24. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, 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 a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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
25. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
26. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
28. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
29. 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
30. 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, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D3246 or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
31. 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
32. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

33. 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 the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
34. 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
35. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
36. 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. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
37. 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
38. 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
39. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit
40. Copies of all , gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted, fuel source, 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
41. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
42. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
43. 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), and 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

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CONDITIONS CONTINUE ON NEXT PAGE

44. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c 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

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10/10/2010 10:10:10 AM

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**DRAFT**

**PERMIT NO:** C-311-23-13

**ISSUANCE DATE:** 01/25/2010

**LEGAL OWNER OR OPERATOR:** CHEVRON USA INC  
**MAILING ADDRESS:** PO BOX 1392  
BAKERSFIELD, CA 93302

**LOCATION:** HEAVY OIL PRODUCTION  
FRESNO COUNTY, CA

**SECTION:** 13 **TOWNSHIP:** 20S **RANGE:** 14E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 58.5 MMBTU/HR SG 13-07 THERMOTICS STEAM GENERATOR, MODEL 5G-50-NDS-15, WITH A NORTH AMERICAN GLE LOW-NOX BURNER WITH FLUE GAS RECIRCULATION AND O2 CONTROLLER: LIMIT NOX TO 9 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Authority to Construct (ATC) C-311-23-11 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The permittee shall notify the District at least seven calendar days prior to the designation of this permit unit as a dormant emissions unit or an active emissions unit. [District Rule 1070] Federally Enforceable Through Title V Permit
5. When designated as a dormant emissions unit the fuel supply line shall be physically disconnected from the emissions unit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
6. When designated as a dormant emissions unit, the permittee shall not be required to perform source testing or monitoring requirements otherwise required by this permit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director APCO

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DAVID WARNER, Director of Permit Services  
C-311-23-13 : Apr 22 2010 8:35AM - RICKARDK : Joint Inspection NOT Required

7. A source test to demonstrate compliance with the NO<sub>x</sub> and CO emission limits shall be performed within 60 days of recommencing operation of the dormant emissions unit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
8. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
9. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
10. 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
11. This unit shall be fired on PUC-quality natural gas, or a blend of PUC-quality natural gas and well casing and tank vapor recovery (TVR) gas. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rule 4320]
13. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Total fuel consumption shall not exceed either of the following limits: 1,404 MMBtu/day nor 457,800 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Emissions from the steam generator shall not exceed any of the following limits: 0.0143 lb-SO<sub>x</sub>/MMBtu, 0.022 lb-PM<sub>10</sub>/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
16. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 9 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.011 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 25.3 lb-NO<sub>x</sub>/day, 5,036 lb-NO<sub>x</sub>/yr, 51.9 lb-CO/day, and 16,939 lb-CO/yr. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. During a shakedown period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO<sub>x</sub> emission rate shall not exceed 15 ppmvd @ 3% O<sub>2</sub> or 0.018 lb/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline. Permittee shall maintain a record of the date of initial operation and shall make such records readily available for District inspection upon request. [District Rule 4320]
22. Operator shall provide an annual fuel analysis to the District. [District Rule 4320]
23. 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 Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit

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24. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, 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 a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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
25. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
26. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
28. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
29. 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
30. 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, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D3246 or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhw - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
31. 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
32. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
33. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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34. 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
35. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
36. 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. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
37. 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
38. 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
39. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit
40. Copies of all , gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted, fuel source, 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
41. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
42. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
43. 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), and 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
44. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c 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

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

PERMIT NO: C-311-25-7

ISSUANCE DATE: 01/25/2010

LEGAL OWNER OR OPERATOR: CHEVRON USA INC  
MAILING ADDRESS: PO BOX 1392  
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION  
FRESNO COUNTY, CA

SECTION: 13 TOWNSHIP: 20S RANGE: 14E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 58.5 MMBTU/HR SG 13-9 STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE LOW-NOX BURNER AND FLUE GAS RECIRCULATION: LIMIT NOX TO 9 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Authority to Construct (ATC) C-311-25-5 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
6. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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

C-311-25-7: Apr 22 2010 8:35AM - RICKARDK : Jobt Inspection NOT Required

7. This unit shall be fired on PUC-quality natural gas, or a blend of PUC-quality natural gas and well casing and tank vapor recovery (TVR) gas. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rule 4320]
9. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Total fuel consumption shall not exceed either of the following limits: 1,404 MMBtu/day nor 435,000 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Emissions from the steam generator shall not exceed any of the following limits: 0.0143 lb-SO<sub>x</sub>/MMBtu, 0.045 lb-PM<sub>10</sub>/MMBtu, or 0.009 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
12. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 9 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.011 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
13. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 25.3 lb-NO<sub>x</sub>/day, 4,785 lb-NO<sub>x</sub>/yr, 51.9 lb-CO/day, and 16,084 lb-CO/yr. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
15. Operator shall provide an annual fuel analysis to the District. [District Rule 4320]
16. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
18. During a shakedown period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO<sub>x</sub> emission rate shall not exceed 15 ppmvd @ 3% O<sub>2</sub> or 0.018 lb/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline. Permittee shall maintain a record of the date of initial operation and shall make such records readily available for District inspection upon request. [District Rule 4320]
19. 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 Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
20. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, 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 a grab sample analysis by GC-FPD/TCD or double GC for H<sub>2</sub>S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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

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CONDITIONS CONTINUE ON NEXT PAGE

21. 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 or 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
22. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
23. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
24. 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 Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
25. 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
26. 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, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SO<sub>x</sub> (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D3246 or double GC for H<sub>2</sub>S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. 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
28. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
29. 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 the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
30. 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

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CONDITIONS CONTINUE ON NEXT PAGE

31. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
32. 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. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
33. 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
34. 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
35. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit
36. Copies of all , gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted, fuel source, 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
37. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
38. 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), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
39. 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), and 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
40. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c 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

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: 01/25/2010

**DRAFT**

PERMIT NO: C-311-27-14

LEGAL OWNER OR OPERATOR: CHEVRON USA INC  
MAILING ADDRESS: PO BOX 1392  
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION  
FRESNO COUNTY, CA

SECTION: 13 TOWNSHIP: 20S RANGE: 14E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 58.5 MMBTU/HR STRUTHERS THERMOFLOOD STEAM GENERATOR #13-11, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE BURNER, EQUIPPED WITH FLUE GAS RECIRCULATION AND AN OXYGEN CONTROLLER: LIMIT NOX TO 7 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT FOR RULE 4320 COMPLIANCE

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
6. This unit shall be fired on PUC-quality natural gas, or a blend of PUC-quality natural gas and well casing and tank vapor recovery (TVR) gas. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director APCO

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DAVID WARNER, Director of Permit Services  
C-311-27-14: Apr 22 2010 8:38AM - RICKARDX : Joint Inspection NOT Required

7. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Total fuel consumption shall not exceed either of the following limits: 1,404 MMBtu/day nor 435,000 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Emissions from the steam generator shall not exceed any of the following limits: 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.045 lb-PM<sub>10</sub>/MMBtu, or 0.009 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
10. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 7 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.008 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
11. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 25.3 lb-NO<sub>x</sub>/day, 3,480 lb-NO<sub>x</sub>/yr, 51.9 lb-CO/day, and 16,084 lb-CO/yr. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
13. Operator shall provide an annual fuel analysis to the District. [District Rule 4320]
14. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
15. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
16. During a shakedown period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO<sub>x</sub> emission rate shall not exceed 15 ppmvd @ 3% O<sub>2</sub> or 0.018 lb/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline. Permittee shall maintain a record of the date of initial operation and shall make such records readily available for District inspection upon request. [District Rule 4320]
17. 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 Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
18. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, 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 a grab sample analysis by GC-FPD/TCD or double GC for H<sub>2</sub>S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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
19. 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 or 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

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CONDITIONS CONTINUE ON NEXT PAGE

20. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
22. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
23. 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
24. 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, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D3246 or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
25. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit.
26. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
28. 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
29. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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30. 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. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
31. 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
32. 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
33. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit
34. Copies of all , gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted, fuel source, 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
35. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
36. 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), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
37. 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), and 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
38. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c 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

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**DRAFT**

PERMIT NO: C-311-28-17

ISSUANCE DATE: 01/25/2010

LEGAL OWNER OR OPERATOR: CHEVRON USA INC  
MAILING ADDRESS: PO BOX 1392  
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION  
FRESNO COUNTY, CA

SECTION: 13 TOWNSHIP: 20S RANGE: 14E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 58.5 MMBTU/HR STRUTHERS THERMOFLOOD STEAM GENERATOR #13-12, MODEL OH-50-ND-16XAM, EQUIPPED WITH A NORTH AMERICAN GLE BURNER, FLUE GAS RECIRCULATION (FGR), AND AN OXYGEN CONTROLLER: LIMIT NOX TO 9 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This unit shall be fired on PUC-quality natural gas, or a blend of PUC-quality natural gas and well casing and tank vapor recovery (TVR) gas. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rule 4320]
5. Total fuel consumption shall not exceed 1,404 MMBtu/day nor 457,800 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The permittee shall install and maintain a non-resettable, totalizing mass or volumetric flow meter in the fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director APCO

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DAVID WARNER, Director of Permit Services

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7. 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
8. Emissions from the steam generator shall not exceed any of the following limits: 0.0143 lb-SO<sub>x</sub>/MMBtu, 0.005 lb-PM<sub>10</sub>/MMBtu, or 0.008 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
9. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 9 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.011 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
10. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 25.3 lb-NO<sub>x</sub>/day, 5,036 lb-NO<sub>x</sub>/yr, 62.9 lb-CO/day, and 20,953 lb-CO/yr. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
12. Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 140 lb/hr, calculated as NO<sub>2</sub>. [District Rules 4301, 5.2.2, 5.3, and 5.5 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
13. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
14. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
15. During a shakedown period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO<sub>x</sub> emission rate shall not exceed 15 ppmvd @ 3% O<sub>2</sub> or 0.018 lb/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline. Permittee shall maintain a record of the date of initial operation and shall make such records readily available for District inspection upon request. [District Rule 4320]
16. Operator shall provide an annual fuel analysis to the District. [District Rule 4320]
17. 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 Rules 2520, 9.3.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
18. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
19. Sampling facilities for source testing shall be provided in accordance with the provisions of rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
20. NO<sub>x</sub>, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District. [District Rule 2520, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit
22. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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23. 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
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 10B or ARB Method 100, Stack Gas Oxygen - EPA Method 3 or 3A or ARB Method 100, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SO<sub>x</sub> (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D3246 or double GC for H<sub>2</sub>S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
25. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
26. 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 the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. 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
28. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
29. Emissions of sulfur compounds from this unit shall not exceed 200 lb/hr, calculated as SO<sub>2</sub>. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit
30. 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 Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

31. 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 ARB Method 1-100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by GC-FPD/TCD or double GC for H<sub>2</sub>S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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
32. 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 or 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
33. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule Rules 2520, 9.3.2; 4305, 4306, 4320, and 4351, 6.2.1] Federally Enforceable Through Title V Permit
34. 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. 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, 4306, and 4320] 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, 4306, and 4320] Federally Enforceable Through Title V Permit
36. 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
37. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit
38. Copies of all , gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted, fuel source, 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
39. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
40. 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), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. 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), and 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
42. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c 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

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: 01/25/2010

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PERMIT NO: C-311-30-17

LEGAL OWNER OR OPERATOR: CHEVRON USA INC  
MAILING ADDRESS: PO BOX 1392  
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION  
FRESNO COUNTY, CA

SECTION: 13 TOWNSHIP: 20S RANGE: 14E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 62.5 MMBTU/HR STRUTHERS THERMOFLOOD STEAM GENERATOR #13-14, MODEL OH-50-ND-16XAM, NATURAL GAS FIRED, WITH A NORTH AMERICAN GLE BURNER, AN OXYGEN CONTROLLER, AND A FLUE GAS RECIRCULATION (FGR) SYSTEM: LIMIT NOX TO 9 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This unit shall be fired on PUC-quality natural gas, or a blend of PUC-quality natural gas and well casing and tank vapor recovery (TVR) gas. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rule 4320]
5. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Total fuel consumption shall not exceed 457,800 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director APCO

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DAVID WARNER, Director of Permit Services

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7. The permittee shall install and maintain a non-resettable, totalizing mass or volumetric flow meter in the fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
8. 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
9. Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 140 lb/hr, calculated as NO<sub>2</sub>. [District Rules 4301, 5.2.2, 5.3, and 5.5 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
10. Emissions from the steam generator shall not exceed any of the following limits: 0.0143 lb-SO<sub>x</sub>/MMBtu, 0.005 lb-PM<sub>10</sub>/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
11. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 9 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.011 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
12. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 25.3 lb-NO<sub>x</sub>/day, 5,036 lb-NO<sub>x</sub>/yr, 67.3 lb-CO/day, and 21,227 lb-CO/yr. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
14. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
15. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
16. During a shakedown period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO<sub>x</sub> emission rate shall not exceed 15 ppmvd @ 3% O<sub>2</sub> or 0.018 lb/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline. Permittee shall maintain a record of the date of initial operation and shall make such records readily available for District inspection upon request. [District Rule 4320]
17. Operator shall provide an annual fuel analysis to the District. [District Rule 4320]
18. 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 Rules 2520, 9.3.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
20. NO<sub>x</sub>, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
21. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit
22. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

23. 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
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 10B or ARB Method 100, Stack Gas Oxygen - EPA Method 3 or 3A or ARB Method 100, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SO<sub>x</sub> (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D3246 or double GC for H<sub>2</sub>S and mercaptans performed in a laboratory, fuel gas h<sub>h</sub>v - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
25. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
26. 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 the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. 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
28. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
29. Emissions of sulfur compounds from this unit shall not exceed 200 lb/hr, calculated as SO<sub>2</sub>. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit
30. 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 Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

31. 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 ARB Method 1-100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, 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 a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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
32. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
33. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rules 2520, 9.4.2, 4305, 4306, 4320, and 4351, 6.2.1] Federally Enforceable Through Title V Permit
34. Natural gas sulfur content and higher heating value (hhv) shall be certified by a third party fuel supplier of each fuel source or natural gas shall be tested for sulfur content and higher heating value (hhv) monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
35. 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. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
36. 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
37. 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
38. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit
39. Copies of all , gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted, fuel source, 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
40. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
41. 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), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
42. 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), and 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
43. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40e 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

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: 01/25/2010

PERMIT NO: C-311-36-18

LEGAL OWNER OR OPERATOR: CHEVRON USA INC  
MAILING ADDRESS: PO BOX 1392  
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION  
FRESNO COUNTY, CA

SECTION: 25 TOWNSHIP: 20S RANGE: 14E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 58.5 MMBTU/HR STRUTHERS THERMOFLOOD STEAM GENERATOR (SG #25-15), MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE LOW-NOX BURNER, FLUE GAS RECIRCULATION SYSTEM AND AN OXYGEN CONTROLLER SERVED BY THE 25D NEPTUNE AIRPOL CAUSTIC SCRUBBER WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS FROM SECTIONS 25D AND 6C ONLY: LIMIT NOX TO 9 PPM @ 3% O2 AND REQUIRE 95% SULFUR REMOVAL OR 9 PPM SOX LIMIT IN EXHAUST FOR RULE 4320 COMPLIANCE

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Authority to Construct (ATC) C-311-36-15 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This unit shall be fueled with natural gas, LPG, or a blend of natural gas and well casing and tank vapor recovery (TVR) gas. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
6. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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

C-311-36-18 : Apr 22 2010 8:38AM - RICKARDK : Joint Inspection NOT Required

7. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
8. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
9. Total fuel consumption shall not exceed 435,000 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The permittee shall maintain and operate a non-resettable, totalizing mass or volumetric flow meter in the fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Whenever well casing vapors and/or tank vapor recovery gas are being burned in this unit, the SO<sub>2</sub> scrubber shall operate and shall reduce SO<sub>2</sub> emissions by 95% by weight, or shall limit exhaust SO<sub>2</sub> to less than or equal to 9 ppmv corrected to 3.0% oxygen. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
12. Whenever the unit is switched to scrubbed operation, compliance source testing for SO<sub>x</sub> shall be conducted within 60 days of initial scrubbing date unless source testing under scrubbed operation has occurred within the previous 12 months. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
13. PUC quality gas shall be combusted in this unit whenever the scrubber is not being operated. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Scrubber liquor pH shall be maintained between 6.5 and 8.0. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Tray packing flowrate shall be operated at 700 to 840 gallons/minute. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Quench flowrate shall be operated at 145 to 185 gallons/minute. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Emissions from the steam generator shall not exceed any of the following limits: 0.052 lb-SO<sub>x</sub>/MMBtu, 0.014 lb-PM<sub>10</sub>/MMBtu, or 0.0085 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 9 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.011 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 25.3 lb-NO<sub>x</sub>/day, 4,785 lb-NO<sub>x</sub>/yr, 49.1 lb-CO/day, and 16,095 lb-CO/yr. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
22. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
23. During a shakedown period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO<sub>x</sub> emission rate shall not exceed 15 ppmvd @ 3% O<sub>2</sub> or 0.018 lb/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline. Permittee shall maintain a record of the date of initial operation and shall make such records readily available for District inspection upon request. [District Rule 4320]

CONDITIONS CONTINUE ON NEXT PAGE

24. 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 Rules 2520, 9.4.2 and 4320] Federally Enforceable Through Title V Permit
25. 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 ARB Method 1-100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, 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 a grab sample analysis by GC-FPD/TCD or double GC for H<sub>2</sub>S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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
26. 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 or double GC for H<sub>2</sub>S and mercaptans performed in the laboratory. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
27. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.4.2, 4305, 4306, 4320, and 4351, 6.2.1] Federally Enforceable Through Title V Permit
28. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
29. 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 the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
30. 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
31. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
32. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

33. Source testing to measure NOx and CO emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
34. Source testing to measure SOx emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. [District Rule 4320]
35. 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
36. 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
37. 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, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D3246 or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
38. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (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
39. Permittee shall measure and record the BTU content of the gas burned at the time of NOx testing, except for natural gas purchased from a PUC regulated utility. [District Rules 2201 and 4801] Federally Enforceable Through Title V Permit
40. 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. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
41. 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
42. 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
43. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit
44. Copies of all , gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted, fuel source, 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
45. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
46. 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), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

47. 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), and 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
48. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c 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

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: 01/25/2010

PERMIT NO: C-311-37-22

LEGAL OWNER OR OPERATOR: CHEVRON USA INC  
MAILING ADDRESS: PO BOX 1392  
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION  
FRESNO COUNTY, CA

SECTION: 25 TOWNSHIP: 20S RANGE: 14E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 62.5 MMBTU/HR STRUTHERS THERMOFLOOD MODEL OH-50-ND-16XAM STEAM GENERATOR (#25-16) WITH A NORTH AMERICAN MODEL GLE LOW NOX BURNER WITH FLUE GAS RECIRCULATION (FGR) SERVED BY THE 25D NEPTUNE AIRPOL CAUSTIC SCRUBBER WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS: LIMIT NOX TO 9 PPM @ 3% O2 AND REQUIRE 95% SULFUR REMOVAL OR 9 PPM SOX LIMIT IN EXHAUST FOR RULE 4320 COMPLIANCE

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This unit shall be fueled with natural gas, LPG, or a blend of natural gas and well casing and tank vapor recovery (TVR) gas. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
5. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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

C-311-37-22: Apr 22 2010 8:36AM - RICKARDK : Joint Inspection NOT Required

Central Regional Office • 1990 E. Gettysburg Ave. • Fresno, CA 93726 • (559) 230-5900 • Fax (559) 230-6061

6. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
7. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
8. Total fuel consumption shall not exceed 1,404 MMBtu/day nor 457,800 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The permittee shall install and maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Whenever well casing vapors and/or tank vapor recovery gas are being burned in this unit, the SO<sub>2</sub> scrubber shall operate and shall reduce SO<sub>2</sub> emissions by 95% by weight, or shall limit exhaust SO<sub>2</sub> to less than or equal to 9 ppmv corrected to 3.0% oxygen. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
11. Whenever the unit is switched to scrubbed operation, compliance source testing for SO<sub>x</sub> shall be conducted within 60 days of initial scrubbing date unless source testing under scrubbed operation has occurred within the previous 12 months. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
12. PUC quality gas shall be combusted in this unit whenever the scrubber is not being operated. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Scrubber liquor pH shall be maintained between 6.5 and 8.0. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Tray packing flowrate shall be operated at 700 to 840 gallons/minute. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Quench flowrate shall be operated at 145 to 185 gallons/minute. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Emissions from the steam generator shall not exceed any of the following limits: 0.052 lb-SO<sub>x</sub>/MMBtu, 0.014 lb-PM<sub>10</sub>/MMBtu, or 0.008 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 9 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.011 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
18. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 25.3 lb-NO<sub>x</sub>/day, 5,036 lb-NO<sub>x</sub>/yr, 85.6 lb-CO/day, and 16,939 lb-CO/yr. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
22. During a shakedown period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO<sub>x</sub> emission rate shall not exceed 15 ppmvd @ 3% O<sub>2</sub> or 0.018 lb/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline. Permittee shall maintain a record of the date of initial operation and shall make such records readily available for District inspection upon request. [District Rule 4320]

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CONDITIONS CONTINUE ON NEXT PAGE

23. 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 Rules 2520, 9.4.2 and 4320] Federally Enforceable Through Title V Permit
24. 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 ARB Method 1-100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, 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 a grab sample analysis by GC-FPD/TCD or double GC for H<sub>2</sub>S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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
25. 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 or double GC for H<sub>2</sub>S and mercaptans performed in the laboratory. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
26. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.4.2, 4305, 4306, 4320, and 4351, 6.2.1] Federally Enforceable Through Title V Permit
27. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
28. 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 the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
29. 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
30. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
31. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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32. Source testing to measure NO<sub>x</sub> and CO emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
33. Source testing to measure SO<sub>x</sub> emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. [District Rule 4320]
34. 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
35. 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, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SO<sub>x</sub> (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D3246 or double GC for H<sub>2</sub>S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
36. 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
37. Sampling facilities for source testing shall be provided in accordance with the provisions of rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
38. Natural gas sulfur content and higher heating value (hhv) shall be certified by a third party fuel supplier of each fuel source or natural gas shall be tested for sulfur content and higher heating value (hhv) monthly. Waste gas shall be tested for sulfur content and higher heating value (hhv) not less than monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
39. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (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
40. Daily records of the tray packing flowrate and the quench flowrate shall be maintained, retained on the premises for a period of at least five years, and made available for District inspection upon request. [District Rule 1070 and 2520, 9.5.2] Federally Enforceable Through Title V Permit
41. Permittee shall measure and record the BTU content of the gas burned at the time of NO<sub>x</sub> source testing, except for natural gas purchased from a PUC regulated utility. [District Rules 2201 and 4801] Federally Enforceable Through Title V Permit
42. 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. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
43. 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
44. 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
45. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

46. Copies of all , gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted, fuel source, 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
47. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
48. 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), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
49. 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), and 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
50. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c 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

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

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**PERMIT NO:** C-311-38-22

**ISSUANCE DATE:** 01/25/2010

**LEGAL OWNER OR OPERATOR:** CHEVRON USA INC  
**MAILING ADDRESS:** PO BOX 1392  
BAKERSFIELD, CA 93302

**LOCATION:** HEAVY OIL PRODUCTION  
FRESNO COUNTY, CA

**SECTION:** 25 **TOWNSHIP:** 20S **RANGE:** 14E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 58.5 MMBTU/HR SG 25-17 STRUTHERS THERMOFLOOD MODEL #OH-50-ND-16XAM NATURAL GAS/LPG/WC/TVC GAS-FIRED STEAM GENERATOR WITH A NORTH AMERICAN MAGNA-FLAME GLE ULTRA-LOW NOX BURNER AND FLUE GAS RECIRCULATION SERVED BY THE 25D NEPTUNE AIRPOL CAUSTIC SCRUBBER WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS (SG 25-17): LIMIT NOX TO 9 PPM @ 3% O2 AND REQUIRE 95% SULFUR REMOVAL OR 9 PPM SOX LIMIT IN EXHAUST FOR RULE 4320 COMPLIANCE

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Authority to Construct (ATC) C-311-38-17 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This unit shall be fueled with natural gas, LPG, or a blend of natural gas and well casing and tank vapor recovery (TVR) gas. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director APCO

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DAVID WARNER, Director of Permit Services

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6. Whenever well casing vapors and/or tank vapor recovery gas are being burned in this unit, the SO<sub>2</sub> scrubber shall operate and shall reduce SO<sub>2</sub> emissions by 95% by weight, or shall limit exhaust SO<sub>2</sub> to less than or equal to 9 ppmv corrected to 3.0% oxygen. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
7. Whenever the unit is switched to scrubbed operation, compliance source testing for SO<sub>x</sub> shall be conducted within 60 days of initial scrubbing date unless source testing under scrubbed operation has occurred within the previous 12 months. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
8. PUC quality gas shall be combusted in this unit whenever the scrubber is not being operated. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Scrubber liquor pH shall be maintained between 6.5 and 8.0. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Tray packing flowrate shall be operated at 700 to 840 gallons/minute. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Quench flowrate shall be operated at 145 to 185 gallons/minute. [District Rule 2201] Federally Enforceable Through Title V Permit
12. 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
13. Total fuel consumption of this unit shall not exceed either of the following limits: 1,404 MMBtu/day nor 457,800 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [County Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus)] Federally Enforceable Through Title V Permit
15. Emissions of sulfur compounds from this unit shall not exceed 200 lb/hr, calculated as SO<sub>2</sub>. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.4.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit
16. Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 140 lb/hr, calculated as NO<sub>2</sub>. [District Rules 4301, 5.2.2, 5.3, and 5.5 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
17. Emissions from the steam generator shall not exceed any of the following limits: 0.052 lb-SO<sub>x</sub>/MMBtu, 0.045 lb-PM<sub>10</sub>/MMBtu, or 0.008 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 9 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.011 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 25.3 lb-NO<sub>x</sub>/day, 5,036 lb-NO<sub>x</sub>/yr, 51.9 lb-CO/day, and 16,939 lb-CO/yr. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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22. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
23. During a shakedown period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NOx emission rate shall not exceed 15 ppmvd @ 3% O2 or 0.018 lb/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline. Permittee shall maintain a record of the date of initial operation and shall make such records readily available for District inspection upon request. [District Rule 4320]
24. 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 Rules 2520, 9.4.2 and 4320] Federally Enforceable Through Title V Permit
25. 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 ARB Method 1-100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, 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 a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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
26. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
27. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.4.2, 4305, 4306, and 4320, and 4351, 6.2.1] Federally Enforceable Through Title V Permit
28. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
29. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
30. Source testing to measure SOx emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. [District Rule 4320]
31. NOx, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
32. 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
33. The results of each source test shall be submitted to the District within 60 days after the source test. [District Rule 1081] Federally Enforceable Through Title V Permit

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34. 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, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SO<sub>x</sub> (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D3246 or double GC for H<sub>2</sub>S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
35. 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 2520, 9.3.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
36. 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 the performing the notification and testing required by this condition. [District Rules 2520, 9.3.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
37. 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 Rule 2520, 9.4.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
38. 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 2520, 9.3.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
39. Natural gas sulfur content and higher heating value (hhv) shall be certified by a third party fuel supplier of each fuel source or natural gas shall be tested for sulfur content and higher heating value (hhv) monthly. Waste gas shall be tested for sulfur content and higher heating value (hhv) not less than monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
40. Permittee shall maintain daily records of the tray packing flowrate and the quench flowrate. [District Rule 1070 and 2520, 9.5.2] Federally Enforceable Through Title V Permit
41. Permittee shall measure and record the BTU content of the gas burned at the time of NO<sub>x</sub> source testing, except for natural gas purchased from a PUC regulated utility. [District Rules 2201 and 4801] Federally Enforceable Through Title V Permit
42. 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. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
43. 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

CONDITIONS CONTINUE ON NEXT PAGE

44. 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
45. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit
46. Copies of all , gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted, fuel source, 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
47. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
48. 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), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
49. 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), and 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
50. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c 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

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**DRAFT**

**PERMIT NO:** C-311-39-20

**ISSUANCE DATE:** 01/25/2010

**LEGAL OWNER OR OPERATOR:** CHEVRON USA INC  
**MAILING ADDRESS:** PO BOX 1392  
BAKERSFIELD, CA 93302

**LOCATION:** HEAVY OIL PRODUCTION  
FRESNO COUNTY, CA

**SECTION:** 25 **TOWNSHIP:** 20S **RANGE:** 14E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 58.5 MMBTU/HR STRUTHERS THERMOFLOOD STEAM GENERATOR #25-18, MODEL OH-50-ND-16XAM, EQUIPPED WITH A NORTH AMERICAN GLE BURNER AND FLUE GAS RECIRCULATION SERVED BY THE 25D NEPTUNE AIRPOL CAUSTIC SCRUBBER WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS: LIMIT NOX TO 9 PPM @ 3% O2 AND REQUIRE 95% SULFUR REMOVAL OR 9 PPM SOX LIMIT IN EXHAUST FOR RULE 4320 COMPLIANCE

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This unit shall be fueled with natural gas, LPG, or a blend of natural gas and well casing and tank vapor recovery (TVR) gas. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Total fuel consumption shall not exceed 1,404 MMBtu/day nor 457,800 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The permittee shall install and maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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

**DRAFT**

DAVID WARNER, Director of Permit Services  
C-311-39-20 : Apr 22 2010 8:38AM - RICKARDX : Joint Inspection NOT Required

6. Whenever well casing vapors and/or tank vapor recovery gas are being burned in this unit, the SO<sub>2</sub> scrubber shall operate and shall reduce SO<sub>2</sub> emissions by 95% by weight, or shall limit exhaust SO<sub>2</sub> to less than or equal to 9 ppmv corrected to 3.0% oxygen. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
7. Whenever the unit is switched to scrubbed operation, compliance source testing for SO<sub>x</sub> shall be conducted within 60 days of initial scrubbing date unless source testing under scrubbed operation has occurred within the previous 12 months. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
8. PUC quality gas shall be combusted in this unit whenever the scrubber is not being operated. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Scrubber liquor pH shall be maintained between 6.5 and 8.0. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Tray packing flowrate shall be operated at 700 to 840 gallons/minute. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Quench flowrate shall be operated at 145 to 185 gallons/minute. [District Rule 2201] Federally Enforceable Through Title V Permit
12. 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
13. Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 140 lb/hr, calculated as NO<sub>2</sub>. [District Rules 4301, 5.2.2, 5.3, and 5.5 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
14. Emissions from the steam generator shall not exceed any of the following limits: 0.052 lb-SO<sub>x</sub>/MMBtu, 0.045 lb-PM<sub>10</sub>/MMBtu, or 0.008 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 9 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.011 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
16. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 25.3 lb-NO<sub>x</sub>/day, 5,036 lb-NO<sub>x</sub>/yr, 62.9 lb-CO/day, and 20,953 lb-CO/yr. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
18. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. During a shakedown period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO<sub>x</sub> emission rate shall not exceed 15 ppmvd @ 3% O<sub>2</sub> or 0.018 lb/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline. Permittee shall maintain a record of the date of initial operation and shall make such records readily available for District inspection upon request. [District Rule 4320] Federally Enforceable Through Title V Permit
21. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

22. 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 Rules 2520, 9.3.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
23. Source testing to measure SO<sub>x</sub> emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. [District Rule 4320]
24. 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
25. NO<sub>x</sub> and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
26. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit
27. Sampling facilities for source testing shall be provided in accordance with the provisions of rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
28. 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
29. 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, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SO<sub>x</sub> (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D3246 or double GC for H<sub>2</sub>S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
30. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
31. 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 the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
32. 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

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CONDITIONS CONTINUE ON NEXT PAGE

33. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
34. Emissions of sulfur compounds from this unit shall not exceed 200 lb/hr, calculated as SO<sub>2</sub>. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit
35. 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 Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
36. 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 ARB Method 1-100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, 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 a grab sample analysis by GC-FPD/TCD or double GC for H<sub>2</sub>S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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
37. 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 or 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
38. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rules 2520, 9.3.2, 4305, 4306, 4320, and 4351, 6.2.1] Federally Enforceable Through Title V Permit
39. Natural gas sulfur content and higher heating value (hhv) shall be certified by a third party fuel supplier of each fuel source or natural gas shall be tested for sulfur content and higher heating value (hhv) monthly. Waste gas shall be tested for sulfur content and higher heating value (hhv) not less than monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
40. Daily records of the tray packing flowrate and the quench flowrate shall be maintained, retained on the premises for a period of at least five years, and made available for District inspection upon request. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
41. Permittee shall measure and record the BTU content of the gas burned at the time of NO<sub>x</sub> source testing, except for natural gas purchased from a PUC regulated utility. [District Rules 2201 and 4801] Federally Enforceable Through Title V Permit
42. 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. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
43. 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

CONDITIONS CONTINUE ON NEXT PAGE

44. 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
45. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit
46. Copies of all , gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted, fuel source, 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
47. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
48. 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), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
49. 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), and 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
50. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c 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

**DRAFT**

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

PERMIT NO: C-311-40-19

ISSUANCE DATE: 01/25/2010

LEGAL OWNER OR OPERATOR: CHEVRON USA INC  
MAILING ADDRESS: PO BOX 1392  
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION  
FRESNO COUNTY, CA

SECTION: 25 TOWNSHIP: 20S RANGE: 14E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 58.5 MMBTU/HR NATURAL GAS, LPG OR PROCESS GAS FIRED STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE BURNER, FLUE GAS RECIRCULATION SYSTEM, AN OXYGEN CONTROLLER, SERVED BY THE NEPTUNE AIRPOL CAUSTIC SCRUBBER WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS (COMMON TO C-311-37) (SG-25-19): LIMIT NOX TO 9 PPM @ 3% O2 AND REQUIRE 95% SULFUR REMOVAL OR 9 PPM SOX LIMIT IN EXHAUST FOR RULE 4320 COMPLIANCE

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This unit shall be fueled with natural gas, LPG, or a blend of natural gas and well casing and tank vapor recovery (TVR) gas. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Total fuel consumption shall not exceed 434,700 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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

C-311-40-19: Apr 22 2010 8:37AM - RICKARDK : Joint Inspection NOT Required

Central Regional Office • 1990 E. Gettysburg Ave. • Fresno, CA 93726 • (559) 230-5900 • Fax (559) 230-6061

6. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Whenever well casing vapors and/or tank vapor recovery gas are being burned in this unit, the SO<sub>2</sub> scrubber shall operate and shall reduce SO<sub>2</sub> emissions by 95% by weight, or shall limit exhaust SO<sub>2</sub> to less than or equal to 9 ppmv corrected to 3.0% oxygen. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
8. Whenever the unit is switched to scrubbed operation, compliance source testing for SO<sub>x</sub> shall be conducted within 60 days of initial scrubbing date unless source testing under scrubbed operation has occurred within the previous 12 months. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
9. PUC quality gas shall be combusted in this unit whenever the scrubber is not being operated. [District Rule 2201] Federally Enforceable Through Title V Permit
10. 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
11. Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 140 lb/hr, calculated as NO<sub>2</sub>. [District Rules 4301, 5.2.2, 5.3, and 5.5 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Emissions from the steam generator shall not exceed any of the following limits: 0.052 lb-SO<sub>x</sub>/MMBtu, 0.045 lb-PM<sub>10</sub>/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 9 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.011 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
14. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 25.3 lb-NO<sub>x</sub>/day, 4,782 lb-NO<sub>x</sub>/yr, 62.9 lb-CO/day, and 20,098 lb-CO/yr. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
16. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
18. During a shakedown period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO<sub>x</sub> emission rate shall not exceed 15 ppmvd @ 3% O<sub>2</sub> or 0.018 lb/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline. Permittee shall maintain a record of the date of initial operation and shall make such records readily available for District inspection upon request. [District Rule 4320]
19. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. 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 Rules 2520, 9.3.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. Source testing to measure SO<sub>x</sub> emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. [District Rule 4320]

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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. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit
24. 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
25. 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, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SO<sub>x</sub> (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D3246 or double GC for H<sub>2</sub>S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
26. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
27. 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 the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
28. 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
29. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
30. Emissions of sulfur compounds from this unit shall not exceed 200 lb/hr, calculated as SO<sub>2</sub>. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit

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31. 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 Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
32. 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 ARB Method 1-100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, 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 a grab sample analysis by GC-FPD/TCD or double GC for H<sub>2</sub>S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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 Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
33. 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 or 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
34. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rules 2520, 9.3.2, 4305, 4306, 4320, and 4351, 6.2.1] Federally Enforceable Through Title V Permit
35. 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. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
36. 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
37. 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
38. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit
39. Copies of all , gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted, fuel source, 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
40. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
41. 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), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
42. 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), and 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

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CONDITIONS CONTINUE ON NEXT PAGE

43. {1669} This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c 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

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**DRAFT**

PERMIT NO: C-311-41-16

ISSUANCE DATE: 01/25/2010

LEGAL OWNER OR OPERATOR: CHEVRON USA INC  
MAILING ADDRESS: PO BOX 1392  
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION  
FRESNO COUNTY, CA

SECTION: 25 TOWNSHIP: 20S RANGE: 14E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 58.5 MMBTU/HR SG 25-20 STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE BURNER AND FLUE GAS RECIRCULATION SYSTEM, SERVED BY THE NEPTUNE AIRPOL CAUSTIC SCRUBBER WHEN FIRING WELL CASING AND/OR TANK VAPOR RECOVERY GAS: LIMIT NOX TO 9 PPM @ 3% O2 AND REQUIRE 95% SULFUR REMOVAL OR 9 PPM SOX LIMIT IN EXHAUST FOR RULE 4320 COMPLIANCE

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Total fuel consumption shall not exceed 435,000 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Whenever well casing vapors and/or tank vapor recovery gas are being burned in this unit, the SO2 scrubber shall operate and shall reduce SO2 emissions by 95% by weight, or shall limit exhaust SO2 to less than or equal to 9 ppmv corrected to 3.0% oxygen. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.**

Seyed Sadredin, Executive Director APCO

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DAVID WARNER, Director of Permit Services  
C-311-41-16 : Apr 22 2010 8:37AM - RICKARDX : Joint Inspection NOT Required

5. Whenever the unit is switched to scrubbed operation, compliance source testing for SO<sub>x</sub> shall be conducted within 60 days of initial scrubbing date unless source testing under scrubbed operation has occurred within the previous 12 months. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
6. PUC quality gas shall be combusted in this unit whenever the scrubber is not being operated. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The permittee shall install and maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
8. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 140 lb/hr, calculated as NO<sub>2</sub>. [District Rules 4301, 5.2.2, 5.3, and 5.5 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. Emissions from the steam generator shall not exceed any of the following limits: 0.052 lb-SO<sub>x</sub>/MMBtu, 0.044 lb-PM<sub>10</sub>/MMBtu, or 0.0085 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 9 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.011 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
12. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 25.3 lb-NO<sub>x</sub>/day, 4,782 lb-NO<sub>x</sub>/yr, 62.9 lb-CO/day, and 20,109 lb-CO/yr. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
14. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
15. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
16. During a shakedown period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO<sub>x</sub> emission rate shall not exceed 15 ppmvd @ 3% O<sub>2</sub> or 0.018 lb/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline. Permittee shall maintain a record of the date of initial operation and shall make such records readily available for District inspection upon request. [District Rule 4320]
17. 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 Rules 2520, 9.3.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
18. Source testing to measure SO<sub>x</sub> emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. [District Rule 4320]
19. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. NO<sub>x</sub>, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

21. 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
22. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit
23. 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
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 10B or ARB Method 100, Stack Gas Oxygen - EPA Method 3 or 3A or ARB Method 100, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SO<sub>x</sub> (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D3246 or double GC for H<sub>2</sub>S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
25. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
26. 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 the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. 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
28. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
29. 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
30. Emissions of sulfur compounds from this unit shall not exceed 200 lb/hr, calculated as SO<sub>2</sub>. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

31. 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 Rules 2520, 9.3.2, and 4320] Federally Enforceable Through Title V Permit
32. 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 ARB Method 1-100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, 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 a grab sample analysis by GC-FPD/TCD or double GC for H<sub>2</sub>S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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 Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
33. 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 or 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
34. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rules 2520, 9.3.2, 4305, 4306, 4320, and 4351, 6.2.1] Federally Enforceable Through Title V Permit
35. Permittee shall measure and record the BTU content of the gas burned at the time of NO<sub>x</sub> testing, except for natural gas purchased from a PUC regulated utility. [District Rules 2201 and 4801] Federally Enforceable Through Title V Permit
36. 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. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
37. 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
38. 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
39. Permittee shall maintain records of higher heating value (h<sub>h</sub>v), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit
40. Copies of all , gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted, fuel source, 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
41. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
42. 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), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

43. 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), and 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
44. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c 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

DRAFT

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: 01/25/2010

**DRAFT**

PERMIT NO: C-311-42-17

LEGAL OWNER OR OPERATOR: CHEVRON USA INC  
MAILING ADDRESS: PO BOX 1392  
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION  
FRESNO COUNTY, CA

SECTION: 25 TOWNSHIP: 20S RANGE: 14E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 58.5 MMBTU/HR SG 25-21 STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE LOW NOX BURNER AND FLUE GAS RECIRCULATION SYSTEM: LIMIT NOX TO 7 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Authority to Construct (ATC) C-311-42-14 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
6. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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

**DRAFT**

DAVID WARNER, Director of Permit Services  
C-311-42-17: Apr 22 2010 8:37AM - RICKARDK : Joint Inspection NOT Required

7. This unit shall be fired exclusively on PUC-quality natural gas or LPG. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rule 4320]
9. Total fuel consumption shall not exceed the following limits: 1,404 MMBtu/day nor 434,700 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Emissions from the steam generator shall not exceed any of the following limits: 0.0143 lb-SO<sub>x</sub>/MMBtu, 0.045 lb-PM<sub>10</sub>/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
12. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 7 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.008 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
13. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 25.3 lb-NO<sub>x</sub>/day, 3,478 lb-NO<sub>x</sub>/yr, 51.9 lb-CO/day, and 16,084 lb-CO/yr. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
15. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
16. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. During a shakedown period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO<sub>x</sub> emission rate shall not exceed 15 ppmvd @ 3% O<sub>2</sub> or 0.018 lb/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline. Permittee shall maintain a record of the date of initial operation and shall make such records readily available for District inspection upon request. [District Rule 4320]
18. 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 Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
19. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, 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 a grab sample analysis by GC-FPD/TCD or double GC for H<sub>2</sub>S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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
20. 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 or 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

CONDITIONS CONTINUE ON NEXT PAGE

21. Operator shall provide an annual fuel analysis to the District. [District Rule 4320]
22. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2; 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
23. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
24. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
25. 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
26. 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, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D3246 or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
27. 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
28. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
29. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
30. 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
31. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

32. 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. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
33. 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
34. 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
35. Permittee shall maintain records of higher heating value (h<sub>h</sub>v), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit
36. Copies of all , gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted, fuel source, 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
37. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
38. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
39. 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), and 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
40. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c 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

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**DRAFT**

PERMIT NO: C-311-43-15

ISSUANCE DATE: 01/25/2010

LEGAL OWNER OR OPERATOR: CHEVRON USA INC  
MAILING ADDRESS: PO BOX 1392  
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION  
FRESNO COUNTY, CA

SECTION: 25 TOWNSHIP: 20S RANGE: 14E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 58.5 MMBTU/HR SG 25-22 STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16AXM, WITH A NORTH AMERICAN GLE LOW-NOX BURNER AND A FLUE GAS RECIRCULATION (FGR) SYSTEM: LIMIT NOX TO 7 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
4. This unit shall be fired exclusively on PUC-quality natural gas or LPG. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rule 4320]
6. Total fuel consumption shall not exceed 1,404 MMBtu/day nor 434,700 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (569) 230-5950 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

**DRAFT**

DAVID WARNER, Director of Permit Services  
C-311-43-15: Apr 22 2010 8:25AM - RICKARDX : Joint Inspection NOT Required

7. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Emissions of sulfur compounds from this unit shall not exceed 200 lb/hr, calculated as SO<sub>2</sub>. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.4.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit
9. Emissions from the steam generator shall not exceed any of the following limits: 0.0143 lb-SO<sub>x</sub>/MMBtu, 0.045 lb-PM<sub>10</sub>/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
10. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 7 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.008 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
11. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 25.3 lb-NO<sub>x</sub>/day, 3,478 lb-NO<sub>x</sub>/yr, 51.9 lb-CO/day, and 16,084 lb-CO/yr. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
13. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
14. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
15. During a shakedown period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO<sub>x</sub> emission rate shall not exceed 15 ppmvd @ 3% O<sub>2</sub> or 0.018 lb/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline. Permittee shall maintain a record of the date of initial operation and shall make such records readily available for District inspection upon request. [District Rule 4320]
16. 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 Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
17. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3246, D 4084, or a grab sample analysis by GC-FPD/TCD or double GC for H<sub>2</sub>S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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
18. 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 3246, D 4084, or grab sample analysis by GC-FPD/TCD or 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

CONDITIONS CONTINUE ON NEXT PAGE

19. Operator shall provide an annual fuel analysis to the District. [District Rule 4320]
20. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2; 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
22. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
23. 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
24. 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, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D3246 or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhh - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
25. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
26. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
28. 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
29. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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30. 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. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
31. 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
32. 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
33. Permittee shall maintain records of higher heating value (hmv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit
34. Copies of all , gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted, fuel source, 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
35. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
36. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
37. 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), and 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
38. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c 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

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

PERMIT NO: C-311-45-13

ISSUANCE DATE: 01/02/2008

LEGAL OWNER OR OPERATOR: CHEVRON USA INC  
MAILING ADDRESS: PO BOX 1392  
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION  
FRESNO COUNTY, CA

SECTION: 25 TOWNSHIP: 20S RANGE: 14E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 58.5 MMBTU/HR SG 25-24 STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16AXM, WITH A NORTH AMERICAN GLE LOW NOX BURNER AND FLUE GAS RECIRCULATION SYSTEM: REDESIGN CONVECTION/RADIANT SECTIONS

**CONDITIONS**

1. {1829} 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. Authority to Construct (ATC) C-311-45-12 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this Authority to Construct. [District Rule 2201]
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
5. 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
6. This unit shall be fired exclusively with natural gas or LPG. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-6950 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

C-311-45-13; Apr 22 2010 8:25AM - RICKARDK : Joint Inspection NOT Required

7. 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
8. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, 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 a grab sample analysis by GC-FPD/TCD performed in the laboratory and EPA Method 19 to calculated 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
9. 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, 9.3.2] Federally Enforceable Through Title V Permit
10. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2; and 4305, 6.2.1] Federally Enforceable Through Title V Permit
11. Natural gas or LPG consumption shall not exceed either of the following limits: 1,404 MMBtu/day or 434,700 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Emissions from the steam generator shall not exceed any of the following limits: 0.052 lb-SO<sub>x</sub>/MMBtu, 0.045 lb-PM<sub>10</sub>/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Except during start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 15 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub>, equivalent to 0.0182 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub>, equivalent to 0.037 lb-CO/MMBtu. [District Rules 2201, 4301, 5.2, 4305, 5.1, and 4306, 5.1] Federally Enforceable Through Title V Permit
14. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 50.5 lb-NO<sub>x</sub>/day, 15,649 lb-NO<sub>x</sub>/yr, 51.9 lb-CO/day, or 16,084 lb-CO/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of each start-up and shutdown period. [District Rules 4305, 5.5.6 and 4306, 5.3] Federally Enforceable Through Title V Permit
17. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.25 and 3.22] Federally Enforceable Through Title V Permit
18. 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 Rules 4305 and 4306] Federally Enforceable Through Title V Permit

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19. 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. 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
20. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
21. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305 and 4306] Federally Enforceable Through Title V Permit
22. 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
23. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
24. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
25. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
26. 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
27. 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
28. 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 and 4306] Federally Enforceable Through Title V Permit
29. 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 the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
30. 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

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31. 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
32. Copies of all gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted, fuel source, 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
33. Permittee shall record daily natural gas and propane consumption. [District NSR Rule] Federally Enforceable Through Title V Permit
34. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District NSR Rule] Federally Enforceable Through Title V Permit
35. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 6.1, and 4306, 6.1] Federally Enforceable Through Title V Permit
36. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
37. 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), and 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
38. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c 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

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

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PERMIT NO: C-311-46-12

ISSUANCE DATE: 01/25/2010

LEGAL OWNER OR OPERATOR: CHEVRON USA INC  
MAILING ADDRESS: PO BOX 1392  
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION  
FRESNO COUNTY, CA

SECTION: 25 TOWNSHIP: 20S RANGE: 14E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 58.5 MMBTU/HR SG 25-25 STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE LOW-NOX BURNER WITH FLUE GAS RECIRCULATION: LIMIT NOX TO 7 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Authority to Construct (ATC) C-311-46-11 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The permittee shall notify the District at least seven calendar days prior to the designation of this permit unit as a dormant emissions unit or an active emissions unit. [District Rule 1070] Federally Enforceable Through Title V Permit
5. When designated as a dormant emissions unit the fuel supply line shall be physically disconnected from the emissions unit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
6. When designated as a dormant emissions unit, the permittee shall not be required to perform source testing or monitoring requirements otherwise required by this permit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-6950 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.

Sayed Sadredin, Executive Director APCO

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DAVID WARNER, Director of Permit Services

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7. A source test to demonstrate compliance with the NO<sub>x</sub> and CO emission limits shall be performed within 60 days of recommencing operation of the dormant emissions unit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
8. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
9. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
10. 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
11. This unit shall be fired exclusively on PUC-quality natural gas or LPG. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rule 4320]
13. Total fuel consumption shall not exceed the following limits: 1,404 MMBtu/day nor 434,700 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Emissions from the steam generator shall not exceed any of the following limits: 0.0143 lb-SO<sub>x</sub>/MMBtu, 0.045 lb-PM<sub>10</sub>/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
16. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 7 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.008 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 25.3 lb-NO<sub>x</sub>/day, 3,478 lb-NO<sub>x</sub>/yr, 51.9 lb-CO/day, and 16,084 lb-CO/yr. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. During a shakedown period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO<sub>x</sub> emission rate shall not exceed 15 ppmvd @ 3% O<sub>2</sub> or 0.018 lb/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline. Permittee shall maintain a record of the date of initial operation and shall make such records readily available for District inspection upon request. [District Rule 4320]
22. 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 Rules 2520, 9.3.2 and 4320]

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23. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, 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 a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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
24. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
25. Operator shall provide an annual fuel analysis to the District. [District Rule 4320]
26. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2; 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
28. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
29. 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
30. 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, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D3246 or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhw - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
31. 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
32. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
33. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

34. 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
35. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
36. 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. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
37. 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
38. 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
39. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit
40. Copies of all , gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted, fuel source, 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
41. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
42. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
43. 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), and 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
44. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c 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

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**DRAFT**

PERMIT NO: C-311-47-6

ISSUANCE DATE: 01/25/2010

LEGAL OWNER OR OPERATOR: CHEVRON USA INC  
MAILING ADDRESS: PO BOX 1392  
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION  
FRESNO COUNTY, CA

SECTION: 25 TOWNSHIP: 20S RANGE: 14E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 58.5 MMBTU/HR SG 25-26 STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16-XAM, WITH A NORTH AMERICAN GLE LOW-NOX BURNER, AND A FLUE GAS RECIRCULATION SYSTEM: LIMIT NOX TO 7 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Authority to Construct (ATC) C-311-47-5 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The permittee shall notify the District at least seven calendar days prior to the designation of this permit unit as a dormant emissions unit or an active emissions unit. [District Rule 1070]
5. When designated as a dormant emissions unit the fuel supply line shall be physically disconnected from the emissions unit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCO

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DAVID WARNER, Director of Permit Services

C-311-47-6: Apr 22 2010 8:26AM - RICKARDK : Joint Inspection NOT Required

6. When designated as a dormant emissions unit, the permittee shall not be required to perform source testing or monitoring requirements otherwise required by this permit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
7. A source test to demonstrate compliance with the NO<sub>x</sub> and CO emission limits shall be performed within 60 days of recommencing operation of the dormant emissions unit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
8. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
9. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
10. 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
11. This unit shall be fired exclusively on PUC-quality natural gas or LPG. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rule 4320]
13. Total fuel consumption shall not exceed the following limits: 1,404 MMBtu/day nor 435,000 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Emissions from the steam generator shall not exceed any of the following limits: 0.0143 lb-SO<sub>x</sub>/MMBtu, 0.045 lb-PM<sub>10</sub>/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
16. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 7 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.008 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 25.3 lb-NO<sub>x</sub>/day, 3,480 lb-NO<sub>x</sub>/yr, 51.9 lb-CO/day, and 16,095 lb-CO/yr. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. During a shakedown period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO<sub>x</sub> emission rate shall not exceed 15 ppmvd @ 3% O<sub>2</sub> or 0.018 lb/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline. Permittee shall maintain a record of the date of initial operation and shall make such records readily available for District inspection upon request. [District Rule 4320]

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CONDITIONS CONTINUE ON NEXT PAGE

22. 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 Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
23. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
24. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
25. 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
26. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
27. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, 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 a grab sample analysis by GC-FPD/TCD or double GC for H<sub>2</sub>S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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
28. 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 or 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
29. Operator shall provide an annual fuel analysis to the District. [District Rule 4320]
30. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2; 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

31. 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 Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
32. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
33. 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
34. 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, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SO<sub>x</sub> (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D3246 or double GC for H<sub>2</sub>S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
35. 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
36. 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. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
37. 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
38. 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
39. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District NSR Rule] Federally Enforceable Through Title V Permit
40. Copies of all , gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted, fuel source, 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
41. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
42. 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), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
43. 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), and 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
44. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c 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

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**DRAFT**

**PERMIT NO:** C-311-48-7

**ISSUANCE DATE:** 01/25/2010

**LEGAL OWNER OR OPERATOR:** CHEVRON USA INC  
**MAILING ADDRESS:** PO BOX 1392  
BAKERSFIELD, CA 93302

**LOCATION:** HEAVY OIL PRODUCTION  
FRESNO COUNTY, CA

**SECTION:** 25 **TOWNSHIP:** 20S **RANGE:** 14E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 58.5 MMBTU/HR SG 25-27 STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE LOW-NOX BURNER, AND A FLUE GAS RECIRCULATION SYSTEM: LIMIT NOX TO 7 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Authority to Construct (ATC) C-311-48-5 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The permittee shall notify the District at least seven calendar days prior to the designation of this permit unit as a dormant emissions unit or an active emissions unit. [District Rule 1070] Federally Enforceable Through Title V Permit
5. When designated as a dormant emissions unit the fuel supply line shall be physically disconnected from the emissions unit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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

**DRAFT**

DAVID WARNER, Director of Permit Services

C-311-48-7; Apr 22 2010 8:27AM - RICKARDK : Joint Inspection NOT Required

6. When designated as a dormant emissions unit, the permittee shall not be required to perform source testing or monitoring requirements otherwise required by this permit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
7. A source test to demonstrate compliance with the NO<sub>x</sub> and CO emission limits shall be performed within 60 days of recommencing operation of the dormant emissions unit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
8. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
9. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
10. 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
11. This unit shall be fired exclusively on PUC-quality natural gas or LPG. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rule 4320]
13. Total fuel consumption shall not exceed the following limits: 1,404 MMBtu/day nor 435,000 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Emissions from the steam generator shall not exceed any of the following limits: 0.0143 lb-SO<sub>x</sub>/MMBtu, 0.045 lb-PM<sub>10</sub>/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
16. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 7 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.008 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 25.3 lb-NO<sub>x</sub>/day, 3,480 lb-NO<sub>x</sub>/yr, 51.9 lb-CO/day, and 16,095 lb-CO/yr. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. During a shakedown period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO<sub>x</sub> emission rate shall not exceed 15 ppmvd @ 3% O<sub>2</sub> or 0.018 lb/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline. Permittee shall maintain a record of the date of initial operation and shall make such records readily available for District inspection upon request. [District Rule 4320]

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22. 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 Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
23. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, 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 a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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
24. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
25. Operator shall provide an annual fuel analysis to the District. [District Rule 4320]
26. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2; and 4305, 6.2.1] Federally Enforceable Through Title V Permit
27. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
28. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
29. 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
30. 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, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D3246 or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
31. 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
32. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

33. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
34. 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
35. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
36. 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. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
37. 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
38. 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
39. Permittee shall maintain records of higher heating value (hmv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit
40. Copies of all , gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted, fuel source, 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
41. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
42. 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), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
43. 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), and 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

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CONDITIONS CONTINUE ON NEXT PAGE

44. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c 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

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

PERMIT NO: C-311-49-7

ISSUANCE DATE: 01/25/2010

LEGAL OWNER OR OPERATOR: CHEVRON USA INC  
MAILING ADDRESS: PO BOX 1392  
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION  
FRESNO COUNTY, CA

SECTION: 25 TOWNSHIP: 20S RANGE: 14E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 58.5 MMBTU/HR SG 25-28 STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-DN-16XAM, WITH A NORTH AMERICAN GLE LOW-NOX BURNER AND A FLUE GAS RECIRCULATION (FGR) SYSTEM: LIMIT NOX TO 7 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Authority to Construct (ATC) C-311-49-6 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The permittee shall notify the District at least seven calendar days prior to the designation of this permit unit as a dormant emissions unit or an active emissions unit. [District Rule 1070] Federally Enforceable Through Title V Permit
5. When designated as a dormant emissions unit the fuel supply line shall be physically disconnected from the emissions unit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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

C-311-49-7 : Apr 22 2010 8:29AM - RICHARDK : Joint Inspection NOT Required

6. When designated as a dormant emissions unit, the permittee shall not be required to perform source testing or monitoring requirements otherwise required by this permit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
7. A source test to demonstrate compliance with the NO<sub>x</sub> and CO emission limits shall be performed within 60 days of recommencing operation of the dormant emissions unit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
8. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
9. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
10. 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
11. This unit shall be fired exclusively on PUC-quality natural gas or LPG. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rule 4320]
13. Total fuel consumption shall not exceed the following limits: 1,404 MMBtu/day nor 435,000 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Emissions from the steam generator shall not exceed any of the following limits: 0.0143 lb-SO<sub>x</sub>/MMBtu, 0.045 lb-PM<sub>10</sub>/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
16. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 7 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.008 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 25.3 lb-NO<sub>x</sub>/day, 3,480 lb-NO<sub>x</sub>/yr, 51.9 lb-CO/day, and 16,095 lb-CO/yr. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. During a shakedown period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO<sub>x</sub> emission rate shall not exceed 15 ppmvd @ 3% O<sub>2</sub> or 0.018 lb/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline selected for this unit. Permittee shall maintain a record of the date of initial operation and shall make such records readily available for District inspection upon request. [District Rule 4320]

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CONDITIONS CONTINUE ON NEXT PAGE

22. 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 Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
23. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, 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 a grab sample analysis by GC-FPD/TCD or double GC for H<sub>2</sub>S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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
24. 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 or 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
25. Operator shall provide an annual fuel analysis to the District. [District Rule 4320]
26. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2; 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
28. 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 Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
29. 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
30. 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, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SO<sub>x</sub> (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D3246 or double GC for H<sub>2</sub>S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
31. 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
32. 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, 4306, and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

33. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
34. 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
35. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
36. 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. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
37. 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
38. 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
39. Permittee shall maintain records of higher heating value (hmv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit
40. Copies of all , gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted, fuel source, 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
41. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
42. 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), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
43. 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), and 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

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CONDITIONS CONTINUE ON NEXT PAGE

44. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c 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

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

PERMIT NO: C-311-50-7

ISSUANCE DATE: 01/25/2010

LEGAL OWNER OR OPERATOR: CHEVRON USA INC  
MAILING ADDRESS: PO BOX 1392  
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION  
FRESNO COUNTY, CA

SECTION: 25 TOWNSHIP: 20S RANGE: 14E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 58.5 MMBTU/HR SG 25-29 STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-DN-16XAM, WITH A NORTH AMERICAN GLE LOW-NOX BURNER, AND A GAS RECIRCULATION SYSTEM: LIMIT NOX TO 7 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Authority to Construct (ATC) C-311-50-5 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The permittee shall notify the District at least seven calendar days prior to the designation of this permit unit as a dormant emissions unit or an active emissions unit. [District Rule 1070] Federally Enforceable Through Title V Permit
5. When designated as a dormant emissions unit the fuel supply line shall be physically disconnected from the emissions unit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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

C-311-50-7 : Apr 22 2010 8:31AM - RICKARDK : Joint Inspection NOT Required

Central Regional Office • 1990 E. Gettysburg Ave. • Fresno, CA 93726 • (559) 230-5900 • Fax (559) 230-6061

6. When designated as a dormant emissions unit, the permittee shall not be required to perform source testing or monitoring requirements otherwise required by this permit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
7. A source test to demonstrate compliance with the NO<sub>x</sub> and CO emission limits shall be performed within 60 days of recommencing operation of the dormant emissions unit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
8. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
9. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
10. 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
11. This unit shall be fired exclusively on PUC-quality natural gas or LPG. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rule 4320]
13. Total fuel consumption shall not exceed the following limits: 1,404 MMBtu/day nor 435,000 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Emissions from the steam generator shall not exceed any of the following limits: 0.0143 lb-SO<sub>x</sub>/MMBtu, 0.045 lb-PM<sub>10</sub>/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
16. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 7 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.008 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rule 2201 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 25.3 lb-NO<sub>x</sub>/day, 3,480 lb-NO<sub>x</sub>/yr, 51.9 lb-CO/day, and 16,095 lb-CO/yr. [District Rule 2201 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. During a shakedown period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO<sub>x</sub> emission rate shall not exceed 15 ppmvd @ 3% O<sub>2</sub> or 0.018 lb/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline. Permittee shall maintain a record of the date of initial operation and shall make such records readily available for District inspection upon request. [District Rule 4320]

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CONDITIONS CONTINUE ON NEXT PAGE

22. 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 Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
23. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, 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 a grab sample analysis by GC-FPD/TCD or double GC for H<sub>2</sub>S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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
24. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or 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
25. Operator shall provide an annual fuel analysis to the District. [District Rule 4320]
26. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2; 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
28. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
29. 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
30. 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, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D3246 or double GC for H<sub>2</sub>S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
31. 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
32. The permittee shall monitor and record the stack concentration of NOx, 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, 4306, and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

33. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
34. 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
35. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
36. 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. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
37. 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
38. 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
39. Permittee shall maintain records of higher heating value (hmv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit
40. Copies of all , gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted, fuel source, 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
41. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
42. 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), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
43. 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), and 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

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CONDITIONS CONTINUE ON NEXT PAGE



San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**DRAFT**

PERMIT NO: C-311-51-12

ISSUANCE DATE: 01/25/2010

LEGAL OWNER OR OPERATOR: CHEVRON USA INC  
MAILING ADDRESS: PO BOX 1392  
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION  
FRESNO COUNTY, CA

SECTION: 6 TOWNSHIP: 20S RANGE: 15E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 58.5 MMBTU/HR SG 6-31 STRUTHERS THERMOFLOOD STEAM GENERATOR, MODEL OH-50-ND-16XAM, WITH A NORTH AMERICAN GLE LOW-NOX BURNER WITH FLUE GAS RECIRCULATION: LIMIT NOX TO 7 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT FOR RULE 4320 COMPLIANCE

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Authority to Construct (ATC) C-311-51-11 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The permittee shall notify the District at least seven calendar days prior to the designation of this permit unit as a dormant emissions unit or an active emissions unit. [District Rule 1070] Federally Enforceable Through Title V Permit
5. When designated as a dormant emissions unit the fuel supply line shall be physically disconnected from the emissions unit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
6. When designated as a dormant emissions unit, the permittee shall not be required to perform source testing or monitoring requirements otherwise required by this permit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director APCO

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DAVID WARNER, Director of Permit Services  
C-311-51-12: Apr 22 2010 8:32AM - RICKARDK : Joint Inspection NOT Required

7. A source test to demonstrate compliance with the NO<sub>x</sub> and CO emission limits shall be performed within 60 days of recommencing operation of the dormant emissions unit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
8. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
9. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
10. 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
11. This unit shall be fired exclusively PUC-quality natural gas or LPG. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total fuel consumption shall not exceed the following limits: 1,404 MMBtu/day nor 434,700 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Emissions from the steam generator shall not exceed any of the following limits: 0.003 lb-SO<sub>x</sub>/MMBtu, 0.007 lb-PM<sub>10</sub>/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
15. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 7 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.008 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
16. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 25.3 lb-NO<sub>x</sub>/day, 3,478 lb-NO<sub>x</sub>/yr, 51.9 lb-CO/day, and 16,084 lb-CO/yr. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
18. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. During a shakedown period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO<sub>x</sub> emission rate shall not exceed 15 ppmvd @ 3% O<sub>2</sub> or 0.018 lb/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline. Permittee shall maintain a record of the date of initial operation and shall make such records readily available for District inspection upon request. [District Rule 4320]
21. 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 Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

22. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, 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 a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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
23. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
24. Operator shall provide an annual fuel analysis to the District. [District Rule 4320]
25. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2; 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
26. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
28. 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
29. 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, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D3246 or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
30. 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
31. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
32. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

33. 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
34. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
35. 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. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
36. 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
37. 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
38. Permittee shall maintain records of higher heating value (hmv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit
39. Copies of all , gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted, fuel source, 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
40. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
41. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
42. 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), and 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
43. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c 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

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: 01/25/2010

PERMIT NO: C-311-52-15

LEGAL OWNER OR OPERATOR: CHEVRON USA INC  
MAILING ADDRESS: PO BOX 1392  
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION  
FRESNO COUNTY, CA

SECTION: 6 TOWNSHIP: 20S RANGE: 15E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 58.5 MMBTU/HR SG STRUTHERS THERMOFLOOD STEAM GENERATOR #6-32, MODEL 0H-50-ND-16XAM, EQUIPPED WITH A NORTH AMERICAN GLE LOW-NOX BURNER, FLUE GAS RECIRCULATION SYSTEM, AND AN OXYGEN CONTROLLER: LIMIT NOX TO 7 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Authority to Construct (ATC) C-311-52-14 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
6. This unit shall be fired exclusively on PUC-quality natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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  
C-311-52-15: Apr 22 2010 8:32AM - RICKARDK : Joint Inspection NOT Required

7. Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rule 4320]
8. Total fuel consumption of this unit shall not exceed the following limits: 1,404 MMBtu/day nor 457,800 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in the fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
10. 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
11. Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 140 lb/hr, calculated as NO<sub>2</sub>. [District Rules 4301, 5.2.2, 5.3, and 5.5 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
12. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [District Rule 4801] Federally Enforceable Through Title V Permit
13. Emissions of sulfur compounds from this unit shall not exceed 200 lb/hr, calculated as SO<sub>2</sub>. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.4.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit
14. Emissions from the steam generator shall not exceed any of the following limits: 0.0143 lb-SO<sub>x</sub>/MMBtu, 0.005 lb-PM<sub>10</sub>/MMBtu, or 0.008 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
15. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 7 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.008 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
16. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 25.3 lb-NO<sub>x</sub>/day, 3,662 lb-NO<sub>x</sub>/yr, 51.9 lb-CO/day, and 16,939 lb-CO/yr. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
18. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. During a shakedown period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO<sub>x</sub> emission rate shall not exceed 15 ppmvd @ 3% O<sub>2</sub> or 0.018 lb/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline. Permittee shall maintain a record of the date of initial operation and shall make such records readily available for District inspection upon request. [District Rule 4320]
21. 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 Rules 2520, 9.4.2 and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

22. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, 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 a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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
23. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
24. Operator shall provide an annual fuel analysis to the District. [District Rule 4320]
25. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: 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
26. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
28. NOx, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District [District Rule 2520; 9.4.2] Federally Enforceable Through Title V Permit
29. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit
30. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. The source test plan shall indicate which test method shall be used to demonstrate compliance. [District Rule 1081] Federally Enforceable Through Title V Permit
31. The results of each source test shall be submitted to the District within 60 days after completion of the test. [District Rule 1081] Federally Enforceable Through Title V Permit
32. 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, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D3246 or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
33. Sampling facilities for source testing shall be provided in accordance with the provisions of rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
34. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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35. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
36. 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
37. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
38. Natural gas sulfur content and higher heating value (hhv) shall be certified by a third party fuel supplier of each fuel source or natural gas shall be tested for sulfur content and higher heating value (hhv) monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
39. 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. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
40. 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
41. 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
42. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit
43. Copies of all , gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted, fuel source, 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
44. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
45. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 1081 (Amended December 16, 1993), 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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46. 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), and 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
47. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c 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

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

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PERMIT NO: C-311-53-16

ISSUANCE DATE: 01/25/2010

LEGAL OWNER OR OPERATOR: CHEVRON USA INC  
MAILING ADDRESS: PO BOX 1392  
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION  
FRESNO COUNTY, CA

SECTION: 6C TOWNSHIP: 20S RANGE: 15E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 58.5 MMBTU/HR STRUTHERS THERMOFLOOD STEAM GENERATOR #6-33, MODEL OH-50-ND-16XAM, EQUIPPED WITH A NORTH AMERICAN GLE LOW-NOX BURNER (OR DISTRICT APPROVED EQUIVALENT), FLUE GAS RECIRCULATION SYSTEM, AND AN OXYGEN CONTROLLER: LIMIT NOX TO 7 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Authority to Construct (ATC) C-311-53-15 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
6. This unit shall be fired exclusively with natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director APCO

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DAVID WARNER, Director of Permit Services  
C-311-53-16: Apr 22 2010 8:32AM - RICKARDK : Joint Inspection NOT Required

7. Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rule 4320]
8. Total fuel consumption of this unit shall not exceed the following limits: 1,404 MMBtu/day nor 457,800 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in the fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
10. 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
11. Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 140 lb/hr, calculated as NO<sub>2</sub>. [District Rules 4301, 5.2.2, 5.3, and 5.5 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
12. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [District Rule 4801] Federally Enforceable Through Title V Permit
13. Emissions of sulfur compounds from this unit shall not exceed 200 lb/hr, calculated as SO<sub>2</sub>. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.4.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit
14. Emissions from the steam generator shall not exceed any of the following limits: 0.0143 lb-SO<sub>x</sub>/MMBtu, 0.005 lb-PM<sub>10</sub>/MMBtu, or 0.008 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
15. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 7 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.008 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
16. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 25.3 lb-NO<sub>x</sub>/day, 3,662 lb-NO<sub>x</sub>/yr, 51.9 lb-CO/day, and 16,939 lb-CO/yr. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
18. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. During a shakedown period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO<sub>x</sub> emission rate shall not exceed 15 ppmvd @ 3% O<sub>2</sub> or 0.018 lb/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline. Permittee shall maintain a record of the date of initial operation and shall make such records readily available for District inspection upon request. [District Rule 4320]
21. 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 Rules 2520, 9.4.2 and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

22. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, 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 a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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
23. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
24. Operator shall provide an annual fuel analysis to the District. [District Rule 4320]
25. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: 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
26. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 6.3.1, 4306, 6.3.1, and 4320] Federally Enforceable Through Title V Permit
28. NOx, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
29. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit
30. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. The source test plan shall indicate which test method shall be used to demonstrate compliance. [District Rule 1081] Federally Enforceable Through Title V Permit
31. The results of each source test shall be submitted to the District within 60 days after completion of the test. [District Rule 1081] Federally Enforceable Through Title V Permit
32. 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, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D3246 or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
33. Sampling facilities for source testing shall be provided in accordance with the provisions of rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
34. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

35. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
36. 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
37. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
38. Natural gas sulfur content and higher heating value (hhv) shall be certified by a third party fuel supplier of each fuel source or natural gas shall be tested for sulfur content and higher heating value (hhv) monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
39. 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. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
40. 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
41. 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
42. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit
43. Copies of all , gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted, fuel source, 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
44. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
45. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 1081 (Amended December 16, 1993), 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

46. 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), and 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
47. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c 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

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**DRAFT**

**PERMIT NO:** C-311-55-16

**ISSUANCE DATE:** 01/25/2010

**LEGAL OWNER OR OPERATOR:** CHEVRON USA INC  
**MAILING ADDRESS:** PO BOX 1392  
BAKERSFIELD, CA 93302

**LOCATION:** HEAVY OIL PRODUCTION  
FRESNO COUNTY, CA

**SECTION:** 6C **TOWNSHIP:** 20S **RANGE:** 15E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 58.5 MMBTU/HR STRUTHERS THERMOFLOOD (#6-35) MODEL OH-50-ND-16XAM NATURAL GAS/TEOR GAS-FIRED STEAM GENERATOR WITH A NORTH AMERICAN GLE LOW-NOX BURNER AND FLUE GAS RECIRCULATION: LIMIT NOX TO 7 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Authority to Construct (ATC) C-311-55-15 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The permittee shall notify the District at least seven calendar days prior to the designation of this permit unit as a dormant emissions unit or an active emissions unit. [District Rule 1070] Federally Enforceable Through Title V Permit
5. When designated as a dormant emissions unit the fuel supply line shall be physically disconnected from the emissions unit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCO

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DAVID WARNER, Director of Permit Services

C-311-55-16 : Apr 22 2010 8:32AM - RICKARDX : Joint Inspection NOT Required

6. When designated as a dormant emissions unit, the permittee shall not be required to perform source testing or monitoring requirements otherwise required by this permit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
7. A source test to demonstrate compliance with the NO<sub>x</sub> and CO emission limits shall be performed within 60 days of recommencing operation of the dormant emissions unit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
8. This unit shall be fired exclusively on PUC-quality natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rule 4320]
10. Total fuel consumption shall not exceed 1,404 MMBtu/day nor 457,800 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The permittee shall install and maintain a non-resettable, totalizing mass or volumetric flow meter in the fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
12. 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
13. Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 140 lb/hr, calculated as NO<sub>2</sub>. [District Rules 4301, 5.2.2, 5.3, and 5.5 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
14. Emissions of sulfur compounds from this unit shall not exceed 200 lb/hr, calculated as SO<sub>2</sub>. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.4.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit
15. Emissions from the steam generator shall not exceed any of the following limits: 0.0143 lb-SO<sub>x</sub>/MMBtu, 0.005 lb-PM<sub>10</sub>/MMBtu, or 0.008 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
16. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 7 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.008 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 25.3 lb-NO<sub>x</sub>/day, 3,662 lb-NO<sub>x</sub>/yr, 66.4 lb-CO/day, and 16,939 lb-CO/yr. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. During a shakedown period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO<sub>x</sub> emission rate shall not exceed 15 ppmvd @ 3% O<sub>2</sub> or 0.018 lb/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline. Permittee shall maintain a record of the date of initial operation and shall make such records readily available for District inspection upon request. [District Rule 4320]

CONDITIONS CONTINUE ON NEXT PAGE

22. 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 Rules 2520, 9.4.2 and 4320] Federally Enforceable Through Title V Permit
23. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, 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 a grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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
24. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD or double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
25. Operator shall provide an annual fuel analysis to the District. [District Rule 4320]
26. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.4.2; 4305, 4306, 4320, and 4351, 6.2.1] Federally Enforceable Through Title V Permit
27. Source testing to measure NOx and CO emissions from this unit while fired on natural gas shall be conducted within 60 days of initial start-up. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
28. Source testing to measure NOx and CO emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
29. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit
30. NOx, and CO emissions shall be measured with source testing conducted by an independent testing laboratory and shall be witnessed or authorized by the District. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
31. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
32. The results of each source test shall be submitted to the District within 60 days after completion of the test. [District Rule 1081] Federally Enforceable Through Title V Permit
33. 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, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SOx (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D3246 or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
34. Sampling facilities for source testing shall be provided in accordance with the provisions of rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

35. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
36. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
37. 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
38. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
39. The portable analyzer shall be calibrated as recommended by the manufacturer. All instrument calibration data shall be kept on file including the date of calibration. The calibration date shall not exceed 3 months prior to the date the stack concentration are measured and recorded. [District Rule 2520, 9.4.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
40. Natural gas sulfur content and higher heating value (hhv) shall be certified by a third party fuel supplier of each fuel source or natural gas shall be tested for sulfur content and higher heating value (hhv) monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
41. 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. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
42. 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
43. 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
44. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit
45. Copies of all , gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted, fuel source, 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

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CONDITIONS CONTINUE ON NEXT PAGE

46. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
47. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements of District Rules 1081 (Amended December 16, 1993), 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
48. 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), and 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
49. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c 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

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**DRAFT**

PERMIT NO: C-311-56-15

ISSUANCE DATE: 01/25/2010

LEGAL OWNER OR OPERATOR: CHEVRON USA INC  
MAILING ADDRESS: PO BOX 1392  
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION  
FRESNO COUNTY, CA

SECTION: 6C TOWNSHIP: 20S RANGE: 15E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 58.5 MMBTU/HR STRUTHERS THERMOFLOOD STEAM GENERATOR #6-36, MODEL OH-50-ND-16XAM, NATURAL GAS FIRED, EQUIPPED WITH A NORTH AMERICAN BURNER, MODEL 4131G, AN OXYGEN CONTROLLER, AND A FLUE GAS RECIRCULATION (FGR) SYSTEM: LIMIT NOX TO 7 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Authority to Construct (ATC) C-311-56-14 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The permittee shall notify the District at least seven calendar days prior to the designation of this permit unit as a dormant emissions unit or an active emissions unit. [District Rule 1070] Federally Enforceable Through Title V Permit
5. When designated as a dormant emissions unit the fuel supply line shall be physically disconnected from the emissions unit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director APCO

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DAVID WARNER, Director of Permit Services

C-311-56-15 : Apr 22 2010 8:32AM - RICKARDX : Joint Inspection NOT Required

6. When designated as a dormant emissions unit, the permittee shall not be required to perform source testing or monitoring requirements otherwise required by this permit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
7. A source test to demonstrate compliance with the NO<sub>x</sub> and CO emission limits shall be performed within 60 days of recommencing operation of the dormant emissions unit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
8. The permittee shall install and maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
9. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
10. This steam generator may be operated at the following Coalinga locations: Section 28, T19S/R15E, and Section 6, T20S/R15E. Other locations require specific District permits. [District Rule 2201] Federally Enforceable Through Title V Permit
11. This unit shall be fired exclusively on PUC-quality natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rule 4320]
13. Total fuel consumption shall not exceed 1,404 MMBtu/day nor 457,800 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
14. 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
15. Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 140 lb/hr, calculated as NO<sub>2</sub>. [District Rules 4301, 5.2.2, 5.3, and 5.5 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
16. Emissions of sulfur compounds from this unit shall not exceed 200 lb/hr, calculated as SO<sub>2</sub>. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.4.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit
17. Emissions from the steam generator shall not exceed any of the following limits: 0.0143 lb-SO<sub>x</sub>/MMBtu, 0.005 lb-PM<sub>10</sub>/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
18. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 7 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.008 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 25.3 lb-NO<sub>x</sub>/day, 3,662 lb-NO<sub>x</sub>/yr, 66.4 lb-CO/day, and 16,939 lb-CO/yr. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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22. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
23. During a shakedown period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO<sub>x</sub> emission rate shall not exceed 15 ppmvd @ 3% O<sub>2</sub> or 0.018 lb/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline. Permittee shall maintain a record of the date of initial operation and shall make such records readily available for District inspection upon request. [District Rule 4320]
24. 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 Rules 2520, 9.4.2 and 4320] Federally Enforceable Through Title V Permit
25. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, 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 a grab sample analysis by GC-FPD/TCD or double GC for H<sub>2</sub>S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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
26. 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 or double GC for H<sub>2</sub>S and mercaptans performed in the laboratory. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
27. Operator shall provide an annual fuel analysis to the District. [District Rule 4320]
28. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: 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
29. Source testing to measure NO<sub>x</sub> and CO emissions from this unit while fired on natural gas shall be conducted within 60 days of initial start-up. [District NSR Rule and District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
30. Source testing to measure NO<sub>x</sub> and CO emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
31. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit
32. NO<sub>x</sub> and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
33. The results of each source test shall be submitted to the District within 60 days after completion of the test. [District Rule 1081] Federally Enforceable Through Title V Permit
34. 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

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35. 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, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SO<sub>x</sub> (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D3246 or double GC for H<sub>2</sub>S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
36. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
37. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
38. 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
39. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
40. The portable analyzer shall be calibrated as recommended by the manufacturer. All instrument calibration data shall be kept on file including the date of calibration. The calibration date shall not exceed 3 months prior to the date the stack concentrations are measured and recorded. [District Rule 2520, 9.4.2, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
41. Natural gas sulfur content and higher heating value (hhv) shall be certified by a third party fuel supplier of each fuel source or natural gas shall be tested for sulfur content and higher heating value (hhv) monthly. Waste gas shall be tested for sulfur content and higher heating value (hhv) not less than monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
42. 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. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
43. 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

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44. 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
45. Permittee shall maintain records of higher heating value (hhv), in MMBtu/scf, for each gaseous fuel used in this operation. [District Rule 2201] Federally Enforceable Through Title V Permit
46. Copies of all , gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted, fuel source, 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
47. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
48. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements of District Rules 1081 (Amended December 16, 1993), 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
49. 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), and 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
50. The requirements of 40 CFR 72.6(b) and 40 CFR 60.40c 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

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: 01/25/2010

PERMIT NO: C-311-76-14

LEGAL OWNER OR OPERATOR: CHEVRON USA INC  
MAILING ADDRESS: PO BOX 1392  
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION  
FRESNO COUNTY, CA

SECTION: 6C TOWNSHIP: 20S RANGE: 15E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 58.5 MMBTU/HR STRUTHERS THERMOFLOOD (SG 6-38) MODEL OH-50-ND-16XAM NATURAL GAS/LPG/TEOR GAS-FIRED STEAM GENERATOR WITH A NORTH AMERICAN MODEL MAGNA FLAME GLE LOW NOX BURNER AND FLUE GAS RECIRCULATION SYSTEM INCLUDING AN OXYGEN CONTROLLER: LIMIT NOX TO 9 PPM @ 3% O2 AND LIMIT FUEL GAS SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Authority to Construct (ATC) C-311-76-12 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The permittee shall install and maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the boiler. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
6. This unit shall be fired on PUC-quality natural gas, LPG, or a blend of PUC-quality natural gas and well casing and tank vapor recovery (TVR) gas. [District Rule 2201] Federally Enforceable Through Title V Permit

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YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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

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7. Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rule 4320]
8. Total fuel consumption shall not exceed 1,404 MMBtu/day nor 434,700 MMBtu/year. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 140 lb/hr, calculated as NO<sub>2</sub>. [District Rules 4301, 5.2.2, 5.3, and 5.5 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
11. Emissions of sulfur compounds from this unit shall not exceed 200 lb/hr, calculated as SO<sub>2</sub>. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.4.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit
12. Emissions from the steam generator shall not exceed any of the following limits: 0.0143 lb-SO<sub>x</sub>/MMBtu, 0.00675 lb-PM<sub>10</sub>/MMBtu, or 0.00855 lb-VOC/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
13. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 9 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.011 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
14. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 25.3 lb-NO<sub>x</sub>/day, 4,782 lb-NO<sub>x</sub>/yr, 66.4 lb-CO/day, and 16,084 lb-CO/yr. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
16. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
18. During a shakedown period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO<sub>x</sub> emission rate shall not exceed 15 ppmvd @ 3% O<sub>2</sub> or 0.018 lb/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline. Permittee shall maintain a record of the date of initial operation and shall make such records readily available for District inspection upon request. [District Rule 4320]
19. 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 Rules 2520, 9.4.2 and 4320] Federally Enforceable Through Title V Permit

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20. 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 ARB Method 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, 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 a grab sample analysis by GC-FPD/TCD or double GC for H<sub>2</sub>S and mercaptans performed in the laboratory and EPA Method 19 to calculated 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
21. 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 or double GC for H<sub>2</sub>S and mercaptans performed in the laboratory. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
22. Operator shall provide an annual fuel analysis to the District. [District Rule 4320]
23. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.4.2; 4305, 4306, 4320, and 4351, 6.2.1] Federally Enforceable Through Title V Permit
24. Source testing to measure NO<sub>x</sub> and CO emissions from this unit while fired on natural gas shall be conducted within 60 days of initial start-up. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
25. Source testing to measure NO<sub>x</sub> and CO emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
26. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit
27. NO<sub>x</sub>, and CO emissions shall be measured with source testing conducted by independent testing laboratory and shall be witnessed or authorized by the District [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
28. 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
29. The results of each source test shall be submitted to the District within 60 days after completion of the test. [District Rule 1081] Federally Enforceable Through Title V Permit
30. 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, Stack Gas Velocity (ft/min) - EPA Method 2, Stack Gas Moisture Content (%) - EPA Method 4, SO<sub>x</sub> (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, Fuel Gas Sulfur Content - EPA Method 11 or 15, ASTM D3246 or double GC for H<sub>2</sub>S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
31. 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, 4306, and 4320] Federally Enforceable Through Title V Permit

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