



# San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

MAY 08 2012

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

Re: **Notice of Minor Title V Permit Modification**  
**District Facility # S-1703**  
**Project # S-1121280**

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Macpherson Oil Company is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct (ATC) S-1703-180-14 into the Title V operating permit. The ATC authorized the transfer of location of a 62.5 MMBtu/hr steam generator to the Thomas Hill steam plant (SE/4 Section: 12, Township: 28S, Range:28E)

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct (ATC) S-1703-180-14, emission increases, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

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

Sincerely,



David Warner  
Director of Permit Services

Enclosures

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

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061  
[www.valleyair.org](http://www.valleyair.org)

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



# San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

MAY 08 2012

Jody Butler  
Macpherson Oil Company  
PO Box 5368  
Bakersfield, CA 93388

**Re: Notice of Minor Title V Permit Modification  
District Facility # S-1703  
Project # S-1121280**

Dear Mr. Butler:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authority to Construct (ATC) S-1703-180-14 into the Title V operating permit. The ATC authorized the transfer of location of a 62.5 MMBtu/hr steam generator to the Thomas Hill steam plant (SE/4 Section: 12, Township: 28S, Range:28E)

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct (ATC) S-1703-180-14, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

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

Sincerely,



David Warner  
Director of Permit Services

Enclosures

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Tel: (661) 392-5500 FAX: (661) 392-5585

# TITLE V APPLICATION REVIEW

Minor Modification

Project #: S-1121280

Engineer: Steve Davidson

Date: May 1, 2012

Facility Number: S-1703

Facility Name: Macpherson Oil Company

Mailing Address: PO Box 5368

Bakersfield, CA 93388

*Reviewed by ASURR AQE*

MAY 03 2012

Contact Name: Jody Butler

Phone: (661) 393-8065

Responsible Official: Jody Butler

Title: Operations Superintendent

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## I. PROPOSAL

Macpherson Oil Company (Macpherson) is proposing a Title V minor permit modification to incorporate Authority to Construct (ATC) # S-1703-180-14 into Macpherson's Title V permit. ATC S-1703-180-14 authorized the transfer of location of the 62.5 MMBtu/hr steam generator to the Thomas Hill steam plant (SE/4 Section: 12, Township: 28S, Range: 28E).

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

## II. FACILITY LOCATION

The steam Generator is located at Thomas Hill steam plant (SE/4 Section: 12, Township: 28S, Range: 28E) within Macpherson's Heavy Oil Central stationary source.

## III. EQUIPMENT DESCRIPTION

S-1703-180-15: 62.5 MMBTU/HR C.E. NATURAL GAS FIRED STEAM GENERATOR #670 WITH COEN QLN LOW NOX BURNER AND FGR (C-5, DIS# 27554-74)

#### IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to the Title V permits is considered to be a minor modification and, as such, requires no public review.

#### V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

#### VI. DESCRIPTION OF PROPOSED MODIFICATIONS

In project S-111899, Macpherson Oil Company applied for an Authority to Construct (ATC) permit authorizing the transfer of location of a 62.5 MMBtu/hr steam generator to the Thomas Hill steam plant.

Condition # on PTO S-1703-180-4	Condition # on Propose PTO S-1703-180-15	Condition is New, Modified, or Removed	Reason for Change from Current PTO
Permit Location	Permit Location	Modified	Equipment location changed to new location: SE/4 Section: 12, Township: 28S, Range: 28E
--	2	New	District nuisance condition added. Rule 4102. Not federally enforceable.
4	5	Modified	Rule 2520 reference removed as a condition Rule reference.
4	5	Modified	"Section 5.6.1" removed from condition's Rule 4351 reference.

#### VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which

the source would otherwise be subject. Such terms and conditions include;

- a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
  - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
  6. Do not seek to consolidate overlapping applicable requirements.

Because these permit revisions meet all the above criteria, this is a Minor Modification.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

## VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit
- B. Authority to Construct
- C. Emissions Increases
- D. Application
- E. Previous Title V Operating Permit

# ATTACHMENT A

## Proposed Modified Title V Operating Permit

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1703-180-15

**EXPIRATION DATE:** 07/31/2016

**SECTION:** SE/12 **TOWNSHIP:** 28S **RANGE:** 28E

**EQUIPMENT DESCRIPTION:**

62.5 MMBTU/HR C.E. NATURAL GAS FIRED STEAM GENERATOR #670 WITH COEN QLN LOW NOX BURNER AND FGR (C-5, DIS# 27554-74)

## PERMIT UNIT REQUIREMENTS

1. 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
2. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. 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
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. Burner shall be equipped with fuel gas volume flowmeter (a master meter for a group of generators is acceptable upon District approval). [District Rule 4351] Federally Enforceable Through Title V Permit
6. Unit shall be fired on PUC-regulated quality natural gas only. No TEOR or TVR gas may be combusted. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Emission rates shall not exceed any of the following: NO<sub>x</sub> (as NO<sub>2</sub>): 0.0085 lb/MMBtu or 7 ppmv @ 3% O<sub>2</sub>, Sox (as SO<sub>2</sub>): 0.00285 lb/MMBtu, PM<sub>10</sub>: 0.009 lb/MMBtu, CO: 0.0281 lb/MMBtu or 38 ppmv @ 3% O<sub>2</sub>, or VOC: 0.003 lb/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
8. 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
9. 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
10. Test results submitted to the District from unit(s) representing a group of units may be used to demonstrate compliance with NO<sub>x</sub> limits for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NO<sub>x</sub> emission limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. [District Rules 2520, 9.4, 4305, 6.3.2, 4306, 6.3.2 and 4351, 6.3, and 4320] Federally Enforceable Through Title V Permit

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

11. The following conditions must be met for representative unit(s) used to demonstrate compliance for NOx limits for a group of units: 1) all units are initially source tested and emissions from all units in group are similar, 2) all units in group are similar in terms of rated heat input, make and series, operation conditions, fuel used, and control method, 3) the group is owned by a single owner and located at a single stationary source, and 4) all units in the group shall have received the same maintenance and tune-up procedures as the representative unit(s). [District Rules 2520, 9.4.2, 4305, 6.3.2, and 4306, 6.3.2, and 4320] Federally Enforceable Through Title V Permit
12. The number of representative units source tested to demonstrate compliance for NOx limits shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that when 3 source test cycles have been completed, all units in the entire group will have been tested. [District Rules 2520, 9.4.2, 4305, 6.3.2, and 4306, 6.3.2, and 4320] Federally Enforceable Through Title V Permit
13. 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
14. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
15. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SOx (lb/MMBtu) - ARB Method 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
16. 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
17. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
18. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO2. 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 Rule 4301, 5.2.1] Federally Enforceable Through Title V Permit
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 monthly. If a monthly fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
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 6B; or Method 8; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by GC-FPD/TCD performed in the laboratory and EPA Method 19 to 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 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 1072-80, D 3031-81, D 4084-82, D 3246-81 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

22. If fuel analysis is used to demonstrate compliance with conditions of this permit, the fuel higher heating value for each fuel shall be certified by a third party fuel supplier or determined by ASTM D 1826-88 or D 1945-81 in conjunction with ASTM D 3588-89 for gaseous fuels. [District Rule 2520, 9.4.2; 4305, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit
23. Permittee shall conduct sample analysis of noncertified gaseous fuel gas monthly. [District NSR Rule] Federally Enforceable Through Title V Permit
24. 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 analyzer 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
25. 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
26. 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
27. The permittee shall maintain records of: (1) the date and time of NOX, CO, and O2 measurements, (2) the O2 concentration in percent by volume 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
28. Permittee shall maintain records of sulfur content of noncertified gaseous fuel. [District NSR Rule] Federally Enforceable Through Title V Permit
29. Copies of all fuel invoices, gas purchase contracts, supplier certifications, and test results used 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 and all dates on which unit is fired on any noncertified fuel. [District Rule 2520, 9.4.2 and 40 CFR 60.48c(g)] Federally Enforceable Through Title V Permit
30. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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

DRAFT

# ATTACHMENT B

Authority to Construct



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-1703-180-14

**ISSUANCE DATE:** 07/19/2011

**LEGAL OWNER OR OPERATOR:** MACPHERSON OIL COMPANY

**MAILING ADDRESS:** PO BOX 5368  
BAKERSFIELD, CA 93388

**LOCATION:** HEAVY OIL CENTRAL STATIONARY SOURCE  
CA

**SECTION:** SE 12 **TOWNSHIP:** 28S **RANGE:** 28E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 62.5 MMBTU/HR C.E. NATURAL GAS FIRED STEAM GENERATOR #670 WITH GIDEON MGW-63V2 ULTRA LOW NOX OR EQUIVALENT BURNER WITH FGR (C-5, DIS# 27554-74): TRANSFER OF LOCATION TO THE THOMAS HILL STEAM PLANT (SE/4 SECTION: 12, TOWNSHIP: 28S, RANGE: 28E)

### CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. 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
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 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
6. Burner shall be equipped with fuel gas volume flowmeter (a master meter for a group of generators is acceptable upon District approval). [District Rule 4351] Federally Enforceable Through Title V Permit
7. Unit shall be fired on PUC-regulated quality natural gas only. No TEOR or TVR gas may be combusted. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.**

Seyed Sadredin, Executive Director / APCO

  
DAVID WARNER, Director of Permit Services

8. Emission rates shall not exceed any of the following: NO<sub>x</sub> (as NO<sub>2</sub>): 0.0085 lb/MMBtu or 7 ppmv @ 3% O<sub>2</sub>, Sox (as SO<sub>2</sub>): 0.00285 lb/MMBtu, PM<sub>10</sub>: 0.009 lb/MMBtu, CO: 0.0281 lb/MMBtu or 38 ppmv @ 3% O<sub>2</sub>, or VOC: 0.003 lb/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
9. 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
10. 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
11. Test results submitted to the District from unit(s) representing a group of units may be used to demonstrate compliance with NO<sub>x</sub> limits for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NO<sub>x</sub> emission limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. [District Rules 2520, 9.4, 4305, 6.3.2, 4306, 6.3.2 and 4351, 6.3, and 4320] Federally Enforceable Through Title V Permit
12. The following conditions must be met for representative unit(s) used to demonstrate compliance for NO<sub>x</sub> limits for a group of units: 1) all units are initially source tested and emissions from all units in group are similar, 2) all units in group are similar in terms of rated heat input, make and series, operation conditions, fuel used, and control method, 3) the group is owned by a single owner and located at a single stationary source, and 4) all units in the group shall have received the same maintenance and tune-up procedures as the representative unit(s). [District Rules 2520, 9.4.2, 4305, 6.3.2, and 4306, 6.3.2, and 4320] Federally Enforceable Through Title V Permit
13. The number of representative units source tested to demonstrate compliance for NO<sub>x</sub> limits shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that when 3 source test cycles have been completed, all units in the entire group will have been tested. [District Rules 2520, 9.4.2, 4305, 6.3.2, and 4306, 6.3.2, and 4320] Federally Enforceable Through Title V Permit
14. 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
15. 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
16. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, NO<sub>x</sub> (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SO<sub>x</sub> (lb/MMBtu) - ARB Method 100 or EPA Method 6, 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
17. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 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. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, 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 Rule 4301, 5.2.1] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

20. 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 monthly. If a monthly fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
21. 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 6B; or Method 8; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by GC-FPD/TCD performed in the laboratory and EPA Method 19 to 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
22. 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 1072-80, D 3031-81, D 4084-82, D 3246-81 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
23. If fuel analysis is used to demonstrate compliance with conditions of this permit, the fuel higher heating value for each fuel shall be certified by a third party fuel supplier or determined by ASTM D 1826-88 or D 1945-81 in conjunction with ASTM D 3588-89 for gaseous fuels. [District Rule 2520, 9.4.2; 4305, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit
24. Permittee shall conduct sample analysis of noncertified gaseous fuel gas monthly. [District NSR Rule] 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 analyzer 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 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] Federally Enforceable Through Title V Permit
29. Permittee shall maintain records of sulfur content of noncertified gaseous fuel. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

30. Copies of all fuel invoices, gas purchase contracts, supplier certifications, and test results used 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 and all dates on which unit is fired on any noncertified fuel. [District Rule 2520, 9.4.2 and 40 CFR 60.48c(g)] Federally Enforceable Through Title V Permit
31. 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
32. ATC S-1703-180-11 shall be implemented prior to or concurrently with this ATC. [District Rule 2201]

# ATTACHMENT C

## Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
S-1703-180-15	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

# ATTACHMENT D

Application

# San Joaquin Valley Air Pollution Control District

[www.valleyair.org](http://www.valleyair.org)

S-1703-180-15

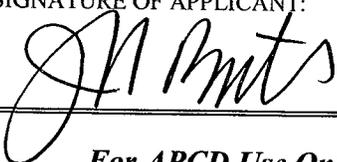
RECEIVED

APR 17 2012

SJVAPCD  
Southern Region

## Permit Application For:

ADMINISTRATIVE AMENDMENT     MINOR MODIFICATION     SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: Macpherson Oil Company	
2. MAILING ADDRESS: STREET/P.O. BOX: P. O. Box 5368 CITY: Bakersfield STATE: CA 9-DIGIT ZIP CODE: 93388	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: Round Mountain Unit CITY: _____ SE ¼ SECTION 12 TOWNSHIP 28S RANGE 28E	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: Oil & Gas Production	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)  Modify Title V permit to implement the following ATC and keep the burner listed on PTO '180-4:  S-1703-180-14	
6. TYPE OR PRINT NAME OF APPLICANT: Jody Butler	TITLE OF APPLICANT: Operations Superintendent
7. SIGNATURE OF APPLICANT: 	DATE: 4/17/12 PHONE: (661) 393-3204 ext 103 FAX: (661) 393-8065 EMAIL: jody_butler@macphersonoil.com

**For APCD Use Only:**

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____
	DATE PAID: _____
	PROJECT NO: S1121280 FACILITY ID: S-1703

*Title V - Minor Mod*

San Joaquin Valley  
Unified Air Pollution Control District

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SJVAPCD  
Southern Region

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION       ADMINISTRATIVE  
 MINOR PERMIT MODIFICATION                       AMENDMENT

COMPANY NAME: <b>Macpherson Oil Company</b>	FACILITY ID: <b>S - 1703</b>
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name:	
3. Agent to the Owner:	

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



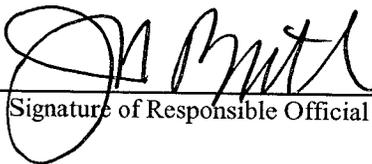
Based on information and belief formed after reasonable inquiry, the source identified in this application will continue to comply with the applicable federal requirement(s).

Based on information and belief formed after reasonable inquiry, the source identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.

Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.

Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

  
\_\_\_\_\_  
Signature of Responsible Official

4/17/12  
\_\_\_\_\_  
Date

Jody Butler  
\_\_\_\_\_  
Name of Responsible Official (please print)

Operations Superintendent  
\_\_\_\_\_  
Title of Responsible Official (please print)

Implement ATC # S-1703-180-14 (Relocate Steam Generator 670 to Sec. 12) into the Title V Permit.

RECEIVED  
APR 17 2012  
SJVAPCD  
Southern Region

April 17, 2012

Mr. Dave Warner  
Director Permit Services  
San Joaquin Valley Air Pollution Control District  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244

**re: Application to Modify Title V Permit  
District Facility No. S-1703**

Dear Mr. Warner:

Please find attached an application form and compliance certification form for a Title V modification of Macpherson Oil Company's (MOC) federal operating permit. MOC is required to implement Authority to Construct S-1703-180-14 into their Title V permit pursuant to Condition #1.

This application submittal has been prepared by Insight Environmental Consultants at the request of MOC. If you have any questions regarding this project or need additional information, please contact Jody Butler of MOC at (661) 393-3204 extension 103 or myself at (661) 282-2200 or by e-mail at [dwmccorm@insenv.com](mailto:dwmccorm@insenv.com).

Sincerely,



Douglas W. McCormick, P.E.

Enclosures

cc: Jody Butler (w/ enclosure)

# ATTACHMENT E

Previous Title V Operating Permit

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1703-180-4

**EXPIRATION DATE:** 07/31/2016

**SECTION:** NE16 **TOWNSHIP:** 27S **RANGE:** 28E

**EQUIPMENT DESCRIPTION:**

62.5 MMBTU/HR C.E. NATURAL GAS FIRED STEAM GENERATOR #670 WITH COEN QLN LOW NOX BURNER AND FGR (C-5, DIS# 27554-74)

## PERMIT UNIT REQUIREMENTS

---

1. 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
2. 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
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. Burner shall be equipped with fuel gas volume flowmeter (a master meter for a group of generators is acceptable upon District approval). [District Rule 4351, 5.6.1; District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
5. Unit shall be fired on PUC-regulated quality natural gas only. No TEOR or TVR gas may be combusted. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Emission rates shall not exceed any of the following: NO<sub>x</sub> (as NO<sub>2</sub>): 0.0085 lb/MMBtu or 7 ppmv @ 3% O<sub>2</sub>, Sox (as SO<sub>2</sub>): 0.00285 lb/MMBtu, PM<sub>10</sub>: 0.009 lb/MMBtu, CO: 0.0281 lb/MMBtu or 38 ppmv @ 3% O<sub>2</sub>, or VOC: 0.003 lb/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
7. 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
8. 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
9. Test results submitted to the District from unit(s) representing a group of units may be used to demonstrate compliance with NO<sub>x</sub> limits for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NO<sub>x</sub> emission limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. [District Rules 2520, 9.4, 4305, 6.3.2, 4306, 6.3.2 and 4351, 6.3, and 4320] Federally Enforceable Through Title V Permit

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

10. The following conditions must be met for representative unit(s) used to demonstrate compliance for NO<sub>x</sub> limits for a group of units: 1) all units are initially source tested and emissions from all units in group are similar, 2) all units in group are similar in terms of rated heat input, make and series, operation conditions, fuel used, and control method, 3) the group is owned by a single owner and located at a single stationary source, and 4) all units in the group shall have received the same maintenance and tune-up procedures as the representative unit(s). [District Rules 2520, 9.4.2, 4305, 6.3.2, and 4306, 6.3.2, and 4320] Federally Enforceable Through Title V Permit
11. The number of representative units source tested to demonstrate compliance for NO<sub>x</sub> limits shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that when 3 source test cycles have been completed, all units in the entire group will have been tested. [District Rules 2520, 9.4.2, 4305, 6.3.2, and 4306, 6.3.2, and 4320] Federally Enforceable Through Title V Permit
12. 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
13. 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
14. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, NO<sub>x</sub> (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SO<sub>x</sub> (lb/MMBtu) - ARB Method 100 or EPA Method 6, 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
15. 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
16. 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
17. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, 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 Rule 4301, 5.2.1] Federally Enforceable Through Title V Permit
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 monthly. If a monthly fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2520, 9.4.2] 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 6B; or Method 8; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by GC-FPD/TCD performed in the laboratory and EPA Method 19 to 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
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 1072-80, D 3031-81, D 4084-82, D 3246-81 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

21. If fuel analysis is used to demonstrate compliance with conditions of this permit, the fuel higher heating value for each fuel shall be certified by a third party fuel supplier or determined by ASTM D 1826-88 or D 1945-81 in conjunction with ASTM D 3588-89 for gaseous fuels. [District Rule 2520, 9.4.2; 4305, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit
22. Permittee shall conduct sample analysis of noncertified gaseous fuel gas monthly. [District NSR Rule] Federally Enforceable Through Title V Permit
23. 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 analyzer 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 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
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 NOX, CO, and O2 measurements, (2) the O2 concentration in percent by volume 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
27. Permittee shall maintain records of sulfur content of noncertified gaseous fuel. [District NSR Rule] Federally Enforceable Through Title V Permit
28. Copies of all fuel invoices, gas purchase contracts, supplier certifications, and test results used 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 and all dates on which unit is fired on any noncertified fuel. [District Rule 2520, 9.4.2 and 40 CFR 60.48c(g)] Federally Enforceable Through Title V Permit
29. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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