San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

DEC 0 9 2014

Joe Miller
West Kern Water District
PO Box 1105
Taft, CA 93268

Re: Notice of Final Action - Minor Title V Permit Modification
District Facility # S-350
Project # S-1114581

Dear Mr. Miller:

The Air Pollution Control Officer has modified the Title V permit for West Kern Water District by incorporating S-350-5-8. West Kern Water District has replaced the existing catalyst system with a new 3-way catalyst for District Rule 4702 compliance. You also complied with 40 CFR 63 Subpart ZZZZ management practice requirements for permit unit '-5.

Enclosed is the modified Title V permit. The application and proposal were sent to US EPA Region IX on July 15, 2013. No comments were received following the District's preliminary decision on this project.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,

Arnaud Marjollet
Director of Permit Services

AM:jy

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

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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

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San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-350-5-9 **EXPIRATION DATE:** 10/31/2016

SECTION: NE31 **TOWNSHIP:** 31S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
840 BHP WAUKESHA MODEL F3524GSI NATURAL GAS/LPG-FIRED IC ENGINE (G2-4) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION

PERMIT UNIT REQUIREMENTS

1. Particulate emissions shall not exceed 0.1 gr/dscf at the point of discharge. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [District Rule 4801 and Rule 407 (Kern)] Federally Enforceable Through Title V Permit
3. Unit shall be fired on PUC quality natural gas with a sulfur content of less than or equal to 0.017% by weight, or on liquefied propane gas (LPG) with a sulfur content equal to or less than 0.008% by weight. [District Rules 4702 and 4801 and Rule 407 (Kern)] Federally Enforceable Through Title V Permit
4. If the IC engine is fired on PUC-regulated natural gas, then maintain on file copies of all natural gas bills. [District Rule 2520] Federally Enforceable Through Title V Permit
5. If the engine is fired on natural gas that is not PUC-regulated, then the sulfur content of the natural gas being fired in the IC engine shall be determined using ASTM methods D1072, D3246, or D4084, or Double GC for H2S and mercaptans. [District Rule 2520] Federally Enforceable Through Title V Permit
6. The sulfur content of each delivery of liquefied petroleum gas being fired in the IC engine shall be determined using ASTM method D2784. An equivalent test method may be accepted with prior written District approval. [District Rule 2520] Federally Enforceable Through Title V Permit
7. If the engine is fired on natural gas that is not PUC-regulated, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2520] Federally Enforceable Through Title V Permit
8. IC engine shall be equipped with a controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District Rule 2201] Federally Enforceable Through Title V Permit
9. This engine shall be equipped with an operational nonresettable elapsed time meter or other APCO approved alternative. [District Rule 4702] Federally Enforceable Through Title V Permit
10. All exhaust emissions shall exit through catalytic converter. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Emissions from this IC engine shall not exceed any of the following limits: 10.4 ppmvd NOx @ 15% O2 or 0.15 g/bhp-hr, averaged over at least 15 minutes; 68.4 ppmvd CO @ 15% O2 or 0.6 g/bhp-hr, averaged over at least 15 minutes; 29.9 ppmvd VOC @ 15% O2 or 0.15 g/bhp-hr, averaged over at least 15 minutes; 0.175 g-PM10/hp-hr; 0.012 g-SOx/hp-hr. [District Rules 2201 and 4702]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

12. For reoccurring 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. NOx, CO and VOC concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702] Federally Enforceable Through Title V Permit

13. Source testing to measure natural gas-combustion NOx, CO and VOC emissions from this engine shall be conducted not less than once every 24 months. [District Rule 4702] Federally Enforceable Through Title V Permit

14. Source testing shall be District witnessed or authorized and conducted by an ARB certified testing contractor. [District Rule 1081] Federally Enforceable Through Title V Permit

15. Source testing for District Rule 4702 compliance 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]

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. The following test methods shall be used: NOX (ppmv) - EPA Method 7E or ARB Method 100; CO (ppmv) - EPA Method 10 or ARB Method 100; stack gas oxygen - EPA Method 3 or 3A or ARB Method 100; VOC (ppmv) - EPA Method 25A or 25B, or ARB Method 100. EPA approved alternative test methods may also be used to satisfy the source testing requirements of this permit with prior written approval from the APCO. [District Rule 4702] Federally Enforceable Through Title V Permit

18. The permittee shall monitor and record the stack concentration of NOx, CO, and O2, using a portable emission monitor that meets District specifications, at least once every calendar quarter (in which a source test is not performed and the engine is operated) or, if the engine is operated less than 120 calendar days in a calendar year, at least once during that calendar year (in which a source test is not performed and the engine is operated). Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last calendar quarter. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702] Federally Enforceable Through Title V Permit

19. If either the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the allowable emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, 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 Rule 4702] Federally Enforceable Through Title V Permit

20. 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 4702] Federally Enforceable Through Title V Permit

21. 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 15% 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 Rule 4702] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

22. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rule 4702] Federally Enforceable Through Title V Permit

23. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702] Federally Enforceable Through Title V Permit

24. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702] Federally Enforceable Through Title V Permit

25. The engine shall be operated and maintained in proper operating condition according to the manufacturer's specifications. [District Rule 4702] Federally Enforceable Through Title V Permit

26. The engine shall be operated such that the O2 sensor output voltage is within 0.6 volts DC - 1.0 volts DC as necessary to meet the air/fuel ratio setting. [40 CFR 64] Federally Enforceable Through Title V Permit

27. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR 64.7] Federally Enforceable Through Title V Permit

28. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR 64.9] Federally Enforceable Through Title V Permit

29. If the District or EPA determines that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR part 64.8. [40 CFR 64.7 and 64.8] Federally Enforceable Through Title V Permit

30. The permittee shall record the O2 sensor reading (in millivolts) on a daily basis. [40 CFR 64.3] Federally Enforceable Through Title V Permit

31. The portable analyzer shall be calibrated in accordance with manufacturer guidelines and District policy SSP-1810. [District Rule 1081] Federally Enforceable Through Title V Permit

32. Upon detecting any excursion from the acceptable range of millivolt readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR 64.7] Federally Enforceable Through Title V Permit

33. Operator shall maintain supplier invoices for each delivery of liquefied petroleum gas including the corresponding certified sulfur content for a period of at least five years. [District Rule 2520] Federally Enforceable Through Title V Permit

34. Compliance with permit conditions in the Title V permit shall be deemed compliance with the applicable requirements of SJVUAPCD Rule 4201, Kern County Rule 407, and the subsumed requirements of Kern County Rule 404. A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit

35. The engine shall be in full compliance with 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

36. The permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

37. The engine's oil and filter shall be changed every 2,160 hours of operation or every 12 months, whichever comes first. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

38. The engine's spark plugs shall be inspected every 2,160 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

39. The engine's hoses and belts shall be inspected every 2,160 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

40. The permittee shall maintain monthly records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. The permittee shall also maintain monthly records of action taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

41. The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d of Subpart ZZZZ. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit