



OCT 15 2013

Mr. Carlton Jordan  
Shell Pipeline Company LLC  
20945 S Wilmington Ave  
Carson, CA 90810-1039

**Re: Notice of Minor Title V Permit Modification**  
**District Facility # S-83**  
**Project # 1124245**

Dear Mr. Jordan:

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 S-83-5-9 into the Title V operating permit. The ATC authorized designation of a 12.5 MMBtu/hr natural gas-fired heater as a Dormant Emissions Unit (DEU) and addition of Rule 4320 emissions fee unit conditions.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct S-83-5-9, 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.

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

Enclosures

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

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

# **TITLE V APPLICATION REVIEW**

Minor Modification  
Project #: S-1124245

Engineer: Richard Edgehill  
Date: October 11, 2013

Facility Number: S-83  
Facility Name: Shell Pipeline Company LLC  
Mailing Address: 20945 S Wilmington Ave  
Carson, CA 90810-1039

Contact Name: Carlton Jordan  
Phone: (310) 816-2060  
Title: Environmental Advisor

Responsible Official: Michael W. Bringham  
Lead Engineer: Richard Karrs

## **I. PROPOSAL**

Shell Pipeline Company LP (Shell) is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct (ATC) S-83-5-9. The ATC authorizes designation of a 12.5 MMBtu/hr natural gas-fired heater as a dormant emissions unit (DEU) and addition of Rule 4320 emissions fee unit conditions.

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 heater is located at the Emidio Station SE Section 7, T 11N, R 20W.

## **III. EQUIPMENT DESCRIPTION**

S-83-5-10: 12.5 MMBTU/HR NATURAL GAS OR LPG FIRED HEATER WITH FLUE GAS RECIRCULATION

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

This change to a Title V permit 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

A condition match between draft PTO and current PTO is provided below.

Draft PTO	Current PTO	Comments
S-83-5-10	S-83-5-8	
1-6		New DEU conditions
7-33	1-27	
34-36		Rule 4320 Emissions Fee Unit conditions

## 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.

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**

- I. Proposed Modified Title V Operating Permit
- II. Authority to Construct
- III. Application
- IV. Previous Title V Operating Permit

## Attachment A

Proposed Modified Title V Operating Permit

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-83-5-10

**EXPIRATION DATE:** 08/31/2016

**SECTION:** SE 7 **TOWNSHIP:** 11N **RANGE:** 20W

**EQUIPMENT DESCRIPTION:**

12.5 MMBTU/HR NATURAL GAS OR LPG FIRED HEATER WITH FLUE GAS RECIRCULATION

## PERMIT UNIT REQUIREMENTS

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1. While dormant, the fuel line shall be physically disconnected from the unit. [District Rule 2080] Federally Enforceable Through Title V Permit
2. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080] Federally Enforceable Through Title V Permit
3. While dormant, normal source testing shall not be required. [District Rule 2080] Federally Enforceable Through Title V Permit
4. Upon recommencing operation of this unit, normal source testing shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
5. Any source testing required by this permit shall be performed within 60 days of recommencing operation of this unit, regardless of whether the unit remains active or is again designated as dormant. [District Rule 2080] Federally Enforceable Through Title V Permit
6. Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070]
7. 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
8. {98} 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 grains/dscf in concentration. [District Rule 4201, 3.0] Federally Enforceable Through Title V Permit
11. The unit shall only be fired on PUC-regulated natural gas or LPG. [District Rule 2201] Federally Enforceable Through Title V Permit
12. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of fuel combusted in the unit shall be installed in each fuel line, utilized and maintained. [District Rules 2201, 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
13. Maximum annual heat input of the unit shall not exceed 30 billion Btu per calendar year. [District Rules 2201, 4305, 5.2 and 4306, 5.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

14. Except during start-up and shutdown emissions rates from the use of natural gas to fire this unit shall not exceed the following limits: 30 ppmv NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.036 lb-NO<sub>x</sub>/MMBtu, 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, 400 ppmv CO @ 3%O<sub>2</sub> or 0.296 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu [District Rules 2201, 4301, 5.2, 4305, 5.1, 4306, 5.1, and 4351, 5.1] Federally Enforceable Through Title V Permit
15. Except during start-up and shutdown emissions rates from the use of LPG to fire this unit shall not exceed the following limits: 30 ppmv NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.036 lb-NO<sub>x</sub>/MMBtu, 0.0164 lb-SO<sub>x</sub>/MMBtu, 0.0066 lb-PM<sub>10</sub>/MMBtu, 400 ppmv CO @ 3%O<sub>2</sub> or 0.296 lb-CO/MMBtu, or 0.0058 lb-VOC/MMBtu. [District Rules 2201, 4301, 5.2, 4305, 5.1, 4306, 5.1, and 4351, 5.1] Federally Enforceable Through Title V Permit
16. During start-up and shutdown periods emissions from the process heater shall not exceed the following limits: 1.25 lb-NO<sub>x</sub>/hr, 0.21 lb-SO<sub>x</sub>/hr, 0.10 lb-PM<sub>10</sub>/hr, 3.70lb-CO/hr, or 0.07 lb-VOC/hr. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Duration of start-up or shutdown shall not exceed two hours each per occurrence, two hours per day, and 400 hours per year. 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, 5.5.6 and 4306, 5.3] Federally Enforceable Through Title V Permit
18. 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
19. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
20. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
21. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.4 and 4306, 5.4 and 5.5] Federally Enforceable Through Title V Permit
22. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. 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, 5.5.2 and 4306, 5.5.2] Federally Enforceable Through Title V Permit
24. Source testing to measure NOx and CO emissions from natural gas-combustion and LPG-combustion in 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 4351, 6.3.1] Federally Enforceable Through Title V Permit
25. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5.1, 4306, 5.5.1 and 4306, 6.3.1] Federally Enforceable Through Title V Permit
26. 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
27. NOx 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, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
28. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
29. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
30. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5.5 and 4306, 5.5.5] Federally Enforceable Through Title V Permit
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. Records of monthly and annual heat input of the unit shall be maintained. [District Rules 2201, 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
33. 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 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
34. Permittee shall determine sulfur content of combusted gas annually or shall demonstrate that the combusted fuel is LPG or natural gas provided from a PUC or FERC regulated source. [District Rules 1081 and 4320] Federally Enforceable Through Title V Permit
35. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit
36. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such 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 and Rule 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-83-5-9

ISSUANCE DATE: 11/13/2012

LEGAL OWNER OR OPERATOR: SHELL PIPELINE COMPANY LP  
MAILING ADDRESS: 20945 S WILMINGTON AVE  
CARSON, CA 90810-1039

LOCATION: EMIDIO STATION  
METTLER, CA

SECTION: SE 7 TOWNSHIP: 11N RANGE: 20W

## EQUIPMENT DESCRIPTION:

MODIFICATION OF 12.5 MMBTU/HR NATURAL GAS OR LPG FIRED HEATER WITH FLUE GAS  
RECIRCULATION: DESIGNATE AS DEU AND ADD RULE 4320 EMISSIONS FEE UNIT CONDITIONS

## CONDITIONS

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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. While dormant, the fuel line shall be physically disconnected from the unit. [District Rule 2080]
3. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080]
4. While dormant, normal source testing shall not be required. [District Rule 2080]
5. Upon recommencing operation of this unit, normal source testing shall resume. [District Rule 2080]
6. Any source testing required by this permit shall be performed within 60 days of recommencing operation of this unit, regardless of whether the unit remains active or is again designated as dormant. [District Rule 2080]
7. Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070]
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

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

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DAVID WARNER, Director of Permit Services  
S-83-5-9, Oct 11 2013 11:32AM - EDGEHILR : Joint Inspection NOT Required

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308 • (661) 392-5500 • Fax (661) 392-5585

9. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
10. 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
11. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.0] Federally Enforceable Through Title V Permit
12. The unit shall only be fired on PUC-regulated natural gas or LPG. [District Rule 2201] Federally Enforceable Through Title V Permit
13. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of fuel combusted in the unit shall be installed in each fuel line, utilized and maintained. [District Rules 2201, 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
14. Maximum annual heat input of the unit shall not exceed 30 billion Btu per calendar year. [District Rules 2201, 4305, 5.2 and 4306, 5.1] Federally Enforceable Through Title V Permit
15. Except during start-up and shutdown emissions rates from the use of natural gas to fire this unit shall not exceed the following limits: 30 ppmv NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.036 lb-NO<sub>x</sub>/MMBtu, 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, 400 ppmv CO @ 3%O<sub>2</sub> or 0.296 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu [District Rules 2201, 4301, 5.2, 4305, 5.1, 4306, 5.1, and 4351, 5.1] Federally Enforceable Through Title V Permit
16. Except during start-up and shutdown emissions rates from the use of LPG to fire this unit shall not exceed the following limits: 30 ppmv NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.036 lb-NO<sub>x</sub>/MMBtu, 0.0164 lb-SO<sub>x</sub>/MMBtu, 0.0066 lb-PM<sub>10</sub>/MMBtu, 400 ppmv CO @ 3%O<sub>2</sub> or 0.296 lb-CO/MMBtu, or 0.0058 lb-VOC/MMBtu. [District Rules 2201, 4301, 5.2, 4305, 5.1, 4306, 5.1, and 4351, 5.1] Federally Enforceable Through Title V Permit
17. During start-up and shutdown periods emissions from the process heater shall not exceed the following limits: 1.25 lb-NO<sub>x</sub>/hr, 0.21 lb-SO<sub>x</sub>/hr, 0.10 lb-PM<sub>10</sub>/hr, 3.70lb-CO/hr, or 0.07 lb-VOC/hr. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Duration of start-up or shutdown shall not exceed two hours each per occurrence, two hours per day, and 400 hours per year. 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, 5.5.6 and 4306, 5.3] 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 Rule 4306, 3.25 and 3.22] Federally Enforceable Through Title V Permit
20. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
21. 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, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

22. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.4 and 4306, 5.4 and 5.5] Federally Enforceable Through Title V Permit
23. 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, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
24. 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, 5.5.2 and 4306, 5.5.2] Federally Enforceable Through Title V Permit
25. Source testing to measure NO<sub>x</sub> and CO emissions from natural gas-combustion and LPG-combustion in 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 4351, 6.3.1] Federally Enforceable Through Title V Permit
26. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5.1, 4306, 5.5.1 and 4306, 6.3.1]
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. 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, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
29. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
30. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 6.2 and 4306, 6.2] 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, 5.5.5 and 4306, 5.5.5] Federally Enforceable Through Title V Permit
32. 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
33. Records of monthly and annual heat input of the unit shall be maintained. [District Rules 2201, 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
34. 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 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
35. Permittee shall determine sulfur content of combusted gas annually or shall demonstrate that the combusted fuel is LPG or natural gas provided from a PUC or FERC regulated source. [District Rules 1081 and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

36. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit
37. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such 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 and Rule 4320] Federally Enforceable Through Title V Permit

Attachment C  
Application

# San Joaquin Valley Air Pollution Control District

www.valleyair.org

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SJVAPCD  
Southern Region

## Permit Application For:

ADMINISTRATIVE AMENDMENT     MINOR MODIFICATION     SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <p style="text-align: center;">Shell Pipeline Company LP</p>	
2. MAILING ADDRESS:  STREET/P.O. BOX: <u>20945 S. Wilmington Ave.</u>  CITY: <u>Carson</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>90810-1039</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:  STREET: <u>EMIDIO STATION</u> CITY: <u>Mettler</u>  <u>SE</u> ¼ SECTION <u>7</u> TOWNSHIP <u>11 N</u> RANGE <u>20 W</u>	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: <p style="text-align: center;">Pipeline Pump Station</p>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)  S-83-5-9 COMPLIANT DORMANT 12.5 MMBTU/HR NATURAL GAS OR LPG FIRED HEATER WITH FGR	
6. TYPE OR PRINT NAME OF APPLICANT:  Carlton Jordan	TITLE OF APPLICANT:  Environmental Advisor
7. SIGNATURE OF APPLICANT:  <i>Carlton Jordan</i>	DATE: <u>11/13/12</u>  PHONE: 310-816-2060 FAX: 713-423-0450 EMAIL: carlton.r.jordan@shell.com

For APCD Use Only: **NO \$**

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____  DATE PAID: _____  PROJECT NO: <u>S-1124245</u> FACILITY ID: <u>S-83</u>
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*Title V - Minor Mod*

San Joaquin Valley  
Unified Air Pollution Control District

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Certification of Truth and Accuracy

SJVAPCD  
Southern Region

COMPANY NAME: Shell Pipeline Company LP	FACILITY ID: S - 83
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**CERTIFICATION :**

I declare, under penalty of perjury under the laws of the state of California that, based on information and belief formed after reasonable inquiry, the statements and information provided in the document are true, accurate, and complete.

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

11/19/12  
\_\_\_\_\_  
Date

Michael W. Bringham  
\_\_\_\_\_  
Name of Responsible Official (please print)

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

Re: Emidio Pump Station, Implement ATC S-83-5-9

Mail to: San Joaquin Valley APCD, 34946 Flyover Court, Bakersfield, CA 93308

NOV 19 2012

SJVAPCD  
Southern Region

# San Joaquin Valley Unified Air Pollution Control District

## 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>Shell Pipeline Company LP</b>	FACILITY ID: S-83
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 equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment 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

11/19/12  
 \_\_\_\_\_  
 Date

Michael W. Bringham

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

Operations Manager

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

Note: To incorporate S-83-5-9 into Title V permit

Mailing Address: Central Regional Office \* 1990 E. Gettysburg Avenue \* Fresno, California 93726-0244 \* (559) 230-5900 \* FAX (559) 230-6061

Attachment D  
Previous Title V Operating Permit

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-83-5-8

**EXPIRATION DATE:** 08/31/2016

**SECTION:** SE 7 **TOWNSHIP:** 11N **RANGE:** 20W

**EQUIPMENT DESCRIPTION:**

12.5 MMBTU/HR NATURAL GAS OR LPG FIRED HEATER WITH FLUE GAS RECIRCULATION

## PERMIT UNIT REQUIREMENTS

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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 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, 3.0] Federally Enforceable Through Title V Permit
5. The unit shall only be fired on PUC-regulated natural gas or LPG. [District Rule 2201] Federally Enforceable Through Title V Permit
6. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of fuel combusted in the unit shall be installed in each fuel line, utilized and maintained. [District Rules 2201, 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
7. Maximum annual heat input of the unit shall not exceed 30 billion Btu per calendar year. [District Rules 2201, 4305, 5.2 and 4306, 5.1] Federally Enforceable Through Title V Permit
8. Except during start-up and shutdown emissions rates from the use of natural gas to fire this unit shall not exceed the following limits: 30 ppmv NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.036 lb-NO<sub>x</sub>/MMBtu, 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, 400 ppmv CO @ 3%O<sub>2</sub> or 0.296 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu [District Rules 2201, 4301, 5.2, 4305, 5.1, 4306, 5.1, and 4351, 5.1] Federally Enforceable Through Title V Permit
9. Except during start-up and shutdown emissions rates from the use of LPG to fire this unit shall not exceed the following limits: 30 ppmv NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.036 lb-NO<sub>x</sub>/MMBtu, 0.0164 lb-SO<sub>x</sub>/MMBtu, 0.0066 lb-PM<sub>10</sub>/MMBtu, 400 ppmv CO @ 3%O<sub>2</sub> or 0.296 lb-CO/MMBtu, or 0.0058 lb-VOC/MMBtu. [District Rules 2201, 4301, 5.2, 4305, 5.1, 4306, 5.1, and 4351, 5.1] Federally Enforceable Through Title V Permit
10. During start-up and shutdown periods emissions from the process heater shall not exceed the following limits: 1.25 lb-NO<sub>x</sub>/hr, 0.21 lb-SO<sub>x</sub>/hr, 0.10 lb-PM<sub>10</sub>/hr, 3.70lb-CO/hr, or 0.07 lb-VOC/hr. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Duration of start-up or shutdown shall not exceed two hours each per occurrence, two hours per day, and 400 hours per year. 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, 5.5.6 and 4306, 5.3] 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.

12. 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
13. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
14. 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, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
15. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.4 and 4306, 5.4 and 5.5] Federally Enforceable Through Title V Permit
16. 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, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
17. 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, 5.5.2 and 4306, 5.5.2] Federally Enforceable Through Title V Permit
18. Source testing to measure NO<sub>x</sub> and CO emissions from natural gas-combustion and LPG-combustion in 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 4351, 6.3.1] Federally Enforceable Through Title V Permit
19. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5.1, 4306, 5.5.1 and 4306, 6.3.1]
20. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

21. NOx 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, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
22. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
23. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
24. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5.5 and 4306, 5.5.5] Federally Enforceable Through Title V Permit
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. Records of monthly and annual heat input of the unit shall be maintained. [District Rules 2201, 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
27. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit

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

# PROJECT ROUTING FORM

FACILITY NAME: Shell Pipeline Company LP

FACILITY ID: S-83 PROJECT NUMBER: 1124245

PERMIT #'s: S-83-5-10

DATE RECEIVED: November 19, 2013

PRELIMINARY REVIEW	ENGR	DATE	SUPR	DATE
A. Application Deemed Incomplete				
Second Information Letter				
B. Application Deemed Complete	RUE	10-11-13	RWC	10/14/13
C. Application Pending Denial				
D. Application Denied				

ENGINEERING EVALUATION	INITIAL	DATE
E. Engineering Evaluation Complete - Project triggering Federal Major Modification: <input type="checkbox"/> Yes AND Information entered in database (AirNet) <input checked="" type="checkbox"/> No (not Fed MMod) - District is Lead Agency for CEQA purposes AND the project GHG emissions increase exceeds 230 metric tons/year: <input type="checkbox"/> Yes AND Information entered in database (AirNet) <input checked="" type="checkbox"/> No	RUE	10-11-13
F. Supervising Engineer Approval		
G. Compliance Division Approval <input type="checkbox"/> Not Required		
H. Applicant's Review of Draft Authority to Construct Completed <input type="checkbox"/> 3-day Review <input type="checkbox"/> 10-day Review <input type="checkbox"/> No Review Requested		
I. Permit Services Regional Manager Approval		

DIRECTOR REVIEW <input type="checkbox"/> Not Required	INITIAL	DATE
J. Preliminary Approval to Director		
K. Final Approval to Director		