



JUN 07 2013

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-2234**  
**Project # S-1131727**

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Occidental of Elk Hills, Inc. is proposing a Title V minor permit modification to incorporate the recently issued S-2234-1-18 into the Title V operating permit. Occidental of Elk Hills, Inc. is proposing a Title V minor permit modification to incorporate Authority to Construct document S-2234-1-18 into the Title V Operating Permit. The ATC authorizes designating two process heaters in the Low Temperature Separation Plant #2 as compliant dormant emissions units.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued S-2234-1-18, 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

**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 #: S1131727

Engineer: Stephen Leonard  
Date: May 30, 2013

*Reviewed by ASUR AQE*

Facility Number: S-2234  
Facility Name: Occidental of Elk Hills, Inc.  
Mailing Address: 10800 Stockdale Highway  
Bakersfield, CA 93311

JUN 04 2013

Contact Name: Raymond Rodriguez  
Phone: 661-412-5263

Responsible Official: Armando Gonzalez  
Title: Health, Environment, and Safety Manager

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## I. PROPOSAL

Occidental of Elk Hills, Inc. (OEHI) is proposing a Title V minor permit modification to incorporate Authority to Construct (ATC) document S-2234-1-18 from District project S-1130692 into the Title V Operating Permit.

The ATC authorizes designating two process heaters in the Low Temperature Separation Plant #2 as compliant dormant emissions units, meaning source testing and periodic monitoring requirements are suspended while a unit is dormant.

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 Low Temperature Separation Plant #2 is located at OEHI's Section 35 Gas Plant in Tupman.

### III. EQUIPMENT DESCRIPTION

**S-2234-1-19:** LOW TEMPERATURE SEPARATION PLANT #2 INCLUDING PROCESS PUMPS, HEAT EXCHANGER(S)/COOLER(S), COOLING TOWER, FUEL GAS/LIQUID K.O. VESSEL(S) VENTED TO FLARE, AND DE-ETHANIZER, DE-BUTANIZER, DE-PROPANIZER COLUMNS VENTED TO FLARE, AND INLET HEAT EXCHANGER

### 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

OEHI received Authority to Construct (ATC) permits to modify two process heaters which operate as part of the Low Temperature Separation Plant #2, designating them as compliant dormant emissions units, meaning source testing and periodic monitoring requirements are suspended while a unit is dormant.

The conditions for each of the proposed modified permits are virtually identical to the current existing permits with the addition of the following seven conditions as conditions 1-7 on each permit:

1. No modification to this unit shall be performed without an Authority to Construct for such modifications, except for changes specified in the conditions below. [District Rule 2010] N
2. While dormant, the fuel line shall be physically disconnected from the unit. [District Rule 2080] N
3. {4562} Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080] N
4. While dormant, normal source testing and monitoring shall not be required. [District Rule 2080] N
5. Upon recommencing operation of this unit, normal source testing and monitoring shall resume. [District Rule 2080] N

6. {4564} 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] N
7. {4565} 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] N

## 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

Occidental of Elk Hills  
S-2234; S1131727

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 Unit S-2234-1-19
- B. Authority to Construct S-2234-1-18
- C. Emissions Increases
- D. Application
- E. Previous Title V Operating Permit Unit S-2234-1-15

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# **ATTACHMENT A**

Proposed Modified Title V Operating Permit Unit

S-2234-1-19

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-2234-1-19

EXPIRATION DATE: 10/31/2016

SECTION: 35 TOWNSHIP: 30S RANGE: 23E

## EQUIPMENT DESCRIPTION:

LOW TEMPERATURE SEPARATION PLANT #2 INCLUDING PROCESS PUMPS, HEAT EXCHANGER(S)/COOLER(S), COOLING TOWER, FUEL GAS/LIQUID K.O. VESSEL(S) VENTED TO FLARE, AND DE-ETHANIZER, DE-BUTANIZER, DE-PROPANIZER COLUMNS VENTED TO FLARE, AND INLET HEAT EXCHANGER

## PERMIT UNIT REQUIREMENTS

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1. While dormant, the fuel lines to heaters F-44-301 and F-44-302 shall be physically disconnected from the units. [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 dormant 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 dormant 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. Operation shall include refrigerant regeneration system, glycol dehydration system, and two compliant dormant 27.5 MMBtu/hr process heaters F-44-301 & F-44-302 (shared with S-2234-3). [District Rule 2201] Federally Enforceable Through Title V Permit
8. Two process heaters F-44-301 & F-44-302 shall be used on a standby basis, only during periods when one or both gas turbines (S-2234-52 & '53) are inoperative. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Fugitive VOC emission rate from the control system added to control emissions from glycol dehydrator reboiler vent, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2c less than or equal to 10,000 ppm (Feb 1999), shall not exceed 0.20 lb/day. Permittee shall demonstrate compliance with specified emissions limit by calculation using the installed components and emissions factors specified above. Permittee shall maintain with the permit an accurate record by number and type of the installed fugitive components and shall make such record available for inspection upon request. [District Rule 2201] 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. Fugitive VOC emission rate from the propane compressor calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2c less than or equal to 10,000 ppm (Feb 1999), shall not exceed 1.9 lb/day. Permittee shall demonstrate compliance with specified emissions limit by calculation using the installed components and emissions factors specified above. Permittee shall maintain with the permit an accurate record by number and type of the installed fugitive components and shall make such record available for inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Control system(s) employed to control emissions from glycol dehydration system vent(s) shall be maintained in a leak free condition, as defined in Rule 4408. [District Rule 4408] Federally Enforceable Through Title V Permit
12. The propane compressor shall be maintained in a gas-tight condition. A gas-tight condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4409 and shall be reported as a deviation. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
13. Permittee shall maintain monthly records of amount of gas dehydrated and other records as required by Rule 4408. The permittee shall make such records readily available for District inspection upon request and shall be retained on the premises for a period of not less than five years. [District Rule 4408] Federally Enforceable Through Title V Permit
14. Process heaters shall be fired exclusively by PUC quality natural gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
15. Permittee shall maintain operational records of standby process heaters FF-44-301 & FF-44-302, including date, time, and total amount of natural gas consumed. These records shall be made readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
16. All process vessels and lines handling volatile organic compounds shall vent only to other process vessels, District-approved flare, or substrata injection system. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Total duration of process heater startup shall not exceed 2 hr/day. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
18. Total duration of process heater shutdown shall not exceed 2 hr/day. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. Except during start-up and shutdown, emissions rates from process heater exhaust shall not exceed any of the following limits: 6 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.007 lb-NO<sub>x</sub>/MMBtu, 0.002 lb-SO<sub>x</sub>/MMBtu, 0.014 lb-PM<sub>10</sub>/MMBtu, 47 ppmvd @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. 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
22. Ammonia (NH<sub>3</sub>) emissions shall not exceed 10 ppmvd @ 3% O<sub>2</sub> over a 15 minute averaging period. [District Rule 4102]
23. Exhaust stack shall be equipped with adequate provisions facilitating the collection of samples consistent with EPA test methods. [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.

24. Source testing to measure natural gas-combustion NOx and CO emissions, and NH3 emissions, from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4102, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
25. 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
26. Continuous Emissions Monitoring (CEM) equipment shall be in place and operating whenever process heater is operating, except for CEM systems breakdowns, repairs, and required calibration checks and zero and span adjustments, in accordance with 40 CFR 60.13(e). NOx (as NO2) and O2 must be recorded continuously when the CEM equipment is operating. [District Rules 1080, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. Operation, calibration and data reduction for the CEM equipment shall be in accordance with the requirements of 40 CFR Part 51, 40 CFR Parts 60.7 and 60.13 (except subsection h), 40 CFR Part 60 Appendix B (Performance Specifications) and 40 CFR Part 60 Appendix F (Quality Assurance Procedures, and applicable provisions of Rule 1080 (Stack Monitoring)). [District Rules 1080, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
28. CEM records shall be retained for at least 5 years. Records shall include occurrence and duration of start-up, shutdown or malfunction; performance testing, calibrations, checks, and maintenance of CEM; and emission measurements. [District Rule 1080] Federally Enforceable Through Title V Permit
29. Daily summaries of CEM records for each calendar quarter shall be submitted to the District within 30 days of the end of the calendar quarter. Hourly fuel stack gas flow rates and/or hourly fuel flow rates shall be measured during operation and included in quarterly reports. [District Rule 1080] Federally Enforceable Through Title V Permit
30. A report shall be submitted to the District within 30 days of the end of each calendar quarter identifying the time and date of each exceedance of emission limits, the excess emissions generated, and any conversion factor used to calculate emissions. [District Rule 1080] Federally Enforceable Through Title V Permit
31. The quarterly report shall identify each period of excess emissions that occurs during startups, shutdowns, or malfunctions. The nature and cause of each malfunction, corrective action taken, and preventative measures adopted shall also be reported. [District Rule 1080] Federally Enforceable Through Title V Permit
32. Heat exchangers utilizing cooling water shall be properly maintained to prevent VOC emissions from cooling towers. [District Rule 2201] Federally Enforceable Through Title V Permit
33. The operator shall test the circulating water from the cooling tower at least every six months to determine the concentration of hexavalent chromium. The District shall be notified 48 hours in advance of any sampling of cooling water for testing. Required testing may be discontinued and an exemption sought when two consecutive required tests show hexavalent chromium concentrations less than 0.15 mg/l. [District Rule 7012] Federally Enforceable Through Title V Permit
34. Operator shall comply with other applicable requirements of District Rule 7012 (amended 12/17/92). [District Rule 7012] Federally Enforceable Through Title V Permit
35. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). [District Rule 1081, and County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 110 (Madera)] Federally Enforceable Through Title V Permit
36. Permittee shall determine sulfur content of combusted gas annually or shall demonstrate that the combusted gas is provided from a PUC or FERC regulated source. [District Rules 1081 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.

37. 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 4320. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
38. Continuous Emissions Monitoring System (CEMS) emissions measurements shall be averaged over a period of 15 consecutive minutes to demonstrate compliance with the applicable emission limits. Any 15-consecutive-minute block average CEMS measurement exceeding the applicable emission limits shall constitute a violation. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
39. Copies of all fuel invoices, gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520] Federally Enforceable Through Title V Permit
40. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO<sub>2</sub>, nor 10 lb/hr. [District Rules 4201 and 4301] Federally Enforceable Through Title V Permit
41. Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 140 lb/hr, calculated as NO<sub>2</sub>. [District Rules 4301] Federally Enforceable Through Title V Permit
42. 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
43. 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
44. 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, 4306, 4320] Federally Enforceable Through Title V Permit
45. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, 4320] Federally Enforceable Through Title V Permit
46. Stack gas oxygen shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
47. SO<sub>x</sub> emissions shall be determined using EPA Method 6C, EPA Method 8, or ARB Method 100. [District Rule 4320] Federally Enforceable Through Title V Permit
48. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: ASTM D 240-87 or D 2382-88 for liquid hydrocarbon fuels; ASTM D 1826-88 or D 1945-81 in conjunction with ASTM D 3588-89 for gaseous fuels. [District Rules 2520, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
49. NH<sub>3</sub> emissions for source test purposes shall be determined using BAAQMD method ST-1B. [District Rule 4301] Federally Enforceable Through Title V Permit
50. 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 and 4301] Federally Enforceable Through Title V Permit
51. 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 for sulfur content (as hydrogen sulfide). [District Rule 2520] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

52. 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] Federally Enforceable Through Title V Permit
53. 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 (as hydrogen sulfide) of the gaseous fuel being fired in the unit shall be calculated using a continuous monitor averaged over a daily basis in accordance with SCAQMD Rule 431.1 Attachment A (as amended June 12, 1998). [District Rule 2520] Federally Enforceable Through Title V Permit
54. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period. To demonstrate compliance with this requirement the operator shall do one of the following: fire the unit only on PUC or FERC regulated natural gas; or test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels; or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rule 2520; County Rules 404 (Madera), 406 (Fresno), and 407 (Kern, Kings, Merced, San Joaquin, Stanislaus, and Tulare)] Federally Enforceable Through Title V Permit
55. The requirements of 40 CFR 60 Subpart LLL do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit

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

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Occidental of Elk Hills  
S-2234; S1131727

# **ATTACHMENT B**

Authority to Construct

S-2234-1-18



## AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-1-18

ISSUANCE DATE: 04/09/2013

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS INC  
MAILING ADDRESS: 10800 STOCKDALE HIGHWAY  
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT  
SECTION SE-35, T-30S, R-23E  
TUPMAN, CA

SECTION: 35 TOWNSHIP: 30S RANGE: 23E

### EQUIPMENT DESCRIPTION:

MODIFICATION OF LOW TEMPERATURE SEPARATION PLANT #2 INCLUDING PROCESS PUMPS, HEAT EXCHANGER(S)/COOLER(S), COOLING TOWER, FUEL GAS/LIQUID K.O. VESSEL(S) VENTED TO FLARE, AND DE-ETHANIZER, DE-BUTANIZER, DE-PROPANIZER COLUMNS VENTED TO FLARE, AND INLET HEAT EXCHANGER: DESIGNATE HEATERS F-44-301 AND F-44-302 AS A COMPLIANT DORMANT EMISSIONS UNIT

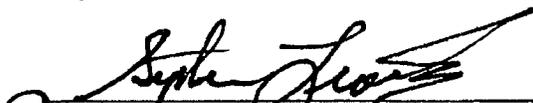
## CONDITIONS

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. While dormant, the fuel lines to heaters F-44-301 and F-44-302 shall be physically disconnected from the units. [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 dormant 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 dormant unit, regardless of whether the unit remains active or is again designated as dormant. [District Rule 2080]

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

S-2234-1-18 : Apr 9 2013 9:11AM - TORID : Joint Inspection NOT Required

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. Operation shall include refrigerant regeneration system, glycol dehydration system, and two compliant dormant 27.5 MMBtu/hr process heaters F-44-301 & F-44-302 (shared with S-2234-3). [District Rule 2201] Federally Enforceable Through Title V Permit
9. Two process heaters F-44-301 & F-44-302 shall be used on a standby basis, only during periods when one or both gas turbines (S-2234-52 & '53) are inoperative. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Fugitive VOC emission rate from the control system added to control emissions from glycol dehydrator reboiler vent, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2c less than or equal to 10,000 ppm (Feb 1999), shall not exceed 0.20 lb/day. Permittee shall demonstrate compliance with specified emissions limit by calculation using the installed components and emissions factors specified above. Permittee shall maintain with the permit an accurate record by number and type of the installed fugitive components and shall make such record available for inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Fugitive VOC emission rate from the propane compressor calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2c less than or equal to 10,000 ppm (Feb 1999), shall not exceed 1.9 lb/day. Permittee shall demonstrate compliance with specified emissions limit by calculation using the installed components and emissions factors specified above. Permittee shall maintain with the permit an accurate record by number and type of the installed fugitive components and shall make such record available for inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Control system(s) employed to control emissions from glycol dehydration system vent(s) shall be maintained in a leak free condition, as defined in Rule 4408. [District Rule 4408, 3.8.2, 5.3 and 6.3.2] Federally Enforceable Through Title V Permit
13. The propane compressor shall be maintained in a gas-tight condition. A gas-tight condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4409 and shall be reported as a deviation. [District Rules 2201 and 4409, 3.20] Federally Enforceable Through Title V Permit
14. Permittee shall maintain monthly records of amount of gas dehydrated and other records as required by Rule 4408. The permittee shall make such records readily available for District inspection upon request and shall be retained on the premises for a period of not less than five years. [District Rule 4408, 6.1.1, 6.1.2 and 6.1.4] Federally Enforceable Through Title V Permit
15. Process heaters shall be fired exclusively by PUC quality natural gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
16. Permittee shall maintain operational records of standby process heaters FF-44-301 & FF-44-302, including date, time, and total amount of natural gas consumed. These records shall be made readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All process vessels and lines handling volatile organic compounds shall vent only to other process vessels, District-approved flare, or substrata injection system. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Total duration of process heater startup shall not exceed 2 hr/day. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. Total duration of process heater shutdown shall not exceed 2 hr/day. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

21. Except during start-up and shutdown, emissions rates from process heater exhaust shall not exceed any of the following limits: 6 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.007 lb-NO<sub>x</sub>/MMBtu, 0.002 lb-SO<sub>x</sub>/MMBtu, 0.014 lb-PM<sub>10</sub>/MMBtu, 47 ppmvd @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
22. 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
23. Ammonia (NH<sub>3</sub>) emissions shall not exceed 10 ppmvd @ 3% O<sub>2</sub> over a 15 minute averaging period. [District Rule 4102] Federally Enforceable Through Title V Permit
24. Exhaust stack shall be equipped with adequate provisions facilitating the collection of samples consistent with EPA test methods. [District Rule 1081] Federally Enforceable Through Title V Permit
25. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions, and NH<sub>3</sub> emissions, from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4102, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
26. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. Continuous Emissions Monitoring (CEM) equipment shall be in place and operating whenever process heater is operating, except for CEM systems breakdowns, repairs, and required calibration checks and zero and span adjustments, in accordance with 40 CFR 60.13(e). NO<sub>x</sub> (as NO<sub>2</sub>) and O<sub>2</sub> must be recorded continuously when the CEM equipment is operating. [District Rules 1080, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
28. Operation, calibration and data reduction for the CEM equipment shall be in accordance with the requirements of 40 CFR Part 51, 40 CFR Parts 60.7 and 60.13 (except subsection h), 40 CFR Part 60 Appendix B (Performance Specifications) and 40 CFR Part 60 Appendix F (Quality Assurance Procedures, and applicable provisions of Rule 1080 (Stack Monitoring)). [District Rules 1080, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
29. CEM records shall be retained for at least 5 years. Records shall include occurrence and duration of start-up, shutdown or malfunction; performance testing, calibrations, checks, and maintenance of CEM; and emission measurements. [District Rule 1080] Federally Enforceable Through Title V Permit
30. Daily summaries of CEM records for each calendar quarter shall be submitted to the District within 30 days of the end of the calendar quarter. Hourly fuel stack gas flow rates and/or hourly fuel flow rates shall be measured during operation and included in quarterly reports. [District Rule 1080] Federally Enforceable Through Title V Permit
31. A report shall be submitted to the District within 30 days of the end of each calendar quarter identifying the time and date of each exceedance of emission limits, the excess emissions generated, and any conversion factor used to calculate emissions. [District Rule 1080] Federally Enforceable Through Title V Permit
32. The quarterly report shall identify each period of excess emissions that occurs during startups, shutdowns, or malfunctions. The nature and cause of each malfunction, corrective action taken, and preventative measures adopted shall also be reported. [District Rule 1080] Federally Enforceable Through Title V Permit
33. Heat exchangers utilizing cooling water shall be properly maintained to prevent VOC emissions from cooling towers. [District Rule 2201] Federally Enforceable Through Title V Permit
34. The operator shall test the circulating water from the cooling tower at least every six months to determine the concentration of hexavalent chromium. The District shall be notified 48 hours in advance of any sampling of cooling water for testing. Required testing may be discontinued and an exemption sought when two consecutive required tests show hexavalent chromium concentrations less than 0.15 mg/l. [District Rule 7012] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

35. Operator shall comply with other applicable requirements of District Rule 7012 (amended 12/17/92). [District Rule 7012] Federally Enforceable Through Title V Permit
36. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Amended December 16, 1993). [District Rule 1081, and County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 110 (Madera)] Federally Enforceable Through Title V Permit
37. Permittee shall determine sulfur content of combusted gas annually or shall demonstrate that the combusted gas is provided from a PUC or FERC regulated source. [District Rules 1081 and 4320] Federally Enforceable Through Title V Permit
38. 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 4320. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
39. Continuous Emissions Monitoring System (CEMS) emissions measurements shall be averaged over a period of 15 consecutive minutes to demonstrate compliance with the applicable emission limits. Any 15-consecutive-minute block average CEMS measurement exceeding the applicable emission limits shall constitute a violation. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
40. Copies of all fuel invoices, gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
41. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO<sub>2</sub>, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
42. Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 140 lb/hr, calculated as NO<sub>2</sub>. [District Rules 4301, 5.2.2] Federally Enforceable Through Title V Permit
43. 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
44. 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
45. 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, 4306, 4320] Federally Enforceable Through Title V Permit
46. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, 4320] Federally Enforceable Through Title V Permit
47. Stack gas oxygen shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
48. SO<sub>x</sub> emissions shall be determined using EPA Method 6C, EPA Method 8, or ARB Method 100. [District Rule 4320] Federally Enforceable Through Title V Permit
49. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: ASTM D 240-87 or D 2382-88 for liquid hydrocarbon fuels; ASTM D 1826-88 or D 1945-81 in conjunction with ASTM D 3588-89 for gaseous fuels. [District Rules 2520, 9.4.2, 4305, 4306, and 4320, 6.2.1] Federally Enforceable Through Title V Permit
50. NH<sub>3</sub> emissions for source test purposes shall be determined using BAAQMD method ST-1B. [District Rule 4301] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

51. 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, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit
52. 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 for sulfur content (as hydrogen sulfide). [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
53. 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
54. 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 (as hydrogen sulfide) of the gaseous fuel being fired in the unit shall be calculated using a continuous monitor averaged over a daily basis in accordance with SCAQMD Rule 431.1 Attachment A (as amended June 12, 1998). [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
55. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period. To demonstrate compliance with this requirement the operator shall do one of the following: fire the unit only on PUC or FERC regulated natural gas; or test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels; or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rule 2520, 9.3.2; County Rules 404 (Madera), 406 (Fresno), and 407 (Kern, Kings, Merced, San Joaquin, Stanislaus, and Tulare)] Federally Enforceable Through Title V Permit
56. The requirements of 40 CFR 60 Subpart LLL do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

Occidental of Elk Hills  
S-2234; S1131727

# **ATTACHMENT C**

Emissions Increases

Occidental of Elk Hills  
S-2234; S1131727

	SSIPE (lb/yr)				
	NO <sub>x</sub>	SO <sub>x</sub>	PM10	CO	VOC
S-2234-1-19	0	0	0	0	0
<b>TOTAL</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

Occidental of Elk Hills  
S-2234; S1131727

# **ATTACHMENT D**

Application



OCCIDENTAL OF ELK HILLS, INC.

10800 Stockdale Highway Bakersfield, California 93311  
Telephone 661 412-5000

RECEIVED

APR 26 2013

SJVAPCD  
Southern Region

April 25, 2013

Mr. Leonard Scandura  
Permit Services Manager  
San Joaquin Valley APCD – Southern Region  
34946 Flyover Court  
Bakersfield, CA 93308

Subject: Minor Modification to Occidental of Elk Hills, Inc.  
Title V Permit (S-2234)

Dear Mr. Scandura:

Occidental of Elk Hills, Inc. (OEHI) requests District approval for an Minor Modification of facility S-2234 Title V Permit to include the below listed Authority to Construct:

S-2234-1-18

Please bill OEHI for all administrative costs associated with this request. If you have any questions or require addition information concerning this issue, please contact me directly at (661) 412-5263 or on my cellular phone at (661) 204-9236.

Sincerely,

A handwritten signature in cursive script, appearing to read "Raymond Rodriguez".

Raymond Rodriguez  
Sr. Environmental Advisor  
Occidental of Elk Hills, Inc.

Cc: Mike Glavin, OEHI  
Kevin Madry, ERM

# San Joaquin Valley Air Pollution Control District

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

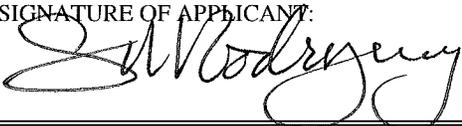
RECEIVED

APR 26 2013

SJVAPCD  
Southern Region

## Permit Application For:

ADMINISTRATIVE AMENDMENT     MINOR MODIFICATION     SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <p style="text-align: center;">Occidental of Elk Hills, Inc</p>	
2. MAILING ADDRESS:  STREET/P.O. BOX: <u>10800 Stockdale Hwy</u>  CITY: <u>Bakersfield</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93311</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:  STREET: <u>Elk Hills</u> CITY: <u>Tupman</u>  ¼ SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: Oil and Natural Gas Production	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)  Incorporate the following ATC into S-2234 Title V Permit:  S-2234-1-18	
6. TYPE OR PRINT NAME OF APPLICANT: <p style="text-align: center;">Raymond Rodriguez</p>	TITLE OF APPLICANT: <p style="text-align: center;">Sr. Environmental Advisor</p>
7. SIGNATURE OF APPLICANT: 	DATE: <u>4/25/2013</u>  PHONE: (661) 412-5263 FAX: (661) 412-5270 EMAIL: Raymond_rodriguez@oxy.com

**For APCD Use Only:**

NO \$

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____
	DATE PAID: _____
	PROJECT NO: <u>S-1131727</u> FACILITY ID: <u>S-2234</u>

# 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 AMENDMENT  
 MINOR PERMIT MODIFICATION

COMPANY NAME: Occidental of Elk Hills, Inc	FACILITY ID: S - 2234
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: Occidental of Elk Hills, Inc	
3. Agent to the Owner: Occidental of Elk Hills, Inc.	

**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:

Armando M. Gonzalez  
Signature of Responsible Official

4/25/2013  
Date

Armando Gonzalez

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

Health, Environmental & Safety Manager

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

Occidental of Elk Hills  
S-2234; S1131727

# **ATTACHMENT E**

Previous Title V Operating Permit Unit

S-2234-1-15

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-2234-1-15

EXPIRATION DATE: 10/31/2016

SECTION: 35 TOWNSHIP: 30S RANGE: 23E

## EQUIPMENT DESCRIPTION:

LOW TEMPERATURE SEPARATION PLANT #2 INCLUDING PROCESS PUMPS, HEAT EXCHANGER(S)/COOLER(S), COOLING TOWER, FUEL GAS/LIQUID K.O. VESSEL(S) VENTED TO FLARE, AND DE-ETHANIZER, DE-BUTANIZER, DE-PROPANIZER COLUMNS VENTED TO FLARE, AND INLET HEAT EXCHANGER

## PERMIT UNIT REQUIREMENTS

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1. Operation shall include refrigerant regeneration system, glycol dehydration system, and two 27.5 MMBtu/hr process heaters F-44-301 & F-44-302 (shared with S-2234-3). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Two process heaters F-44-301 & F-44-302 shall be used on a standby basis, only during periods when one or both gas turbines (S-2234-52 & '53) are inoperative. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Fugitive VOC emission rate from the control system added to control emissions from glycol dehydrator reboiler vent, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2c less than or equal to 10,000 ppm (Feb 1999), shall not exceed 0.20 lb/day. Permittee shall demonstrate compliance with specified emissions limit by calculation using the installed components and emissions factors specified above. Permittee shall maintain with the permit an accurate record by number and type of the installed fugitive components and shall make such record available for inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Fugitive VOC emission rate from the propane compressor calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2c less than or equal to 10,000 ppm (Feb 1999), shall not exceed 1.9 lb/day. Permittee shall demonstrate compliance with specified emissions limit by calculation using the installed components and emissions factors specified above. Permittee shall maintain with the permit an accurate record by number and type of the installed fugitive components and shall make such record available for inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Control system(s) employed to control emissions from glycol dehydration system vent(s) shall be maintained in a leak free condition, as defined in Rule 4408. [District Rule 4408, 3.8.2, 5.3 and 6.3.2] Federally Enforceable Through Title V Permit
6. The propane compressor shall be maintained in a gas-tight condition. A gas-tight condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4409 and shall be reported as a deviation. [District Rules 2201 and 4409, 3.20] Federally Enforceable Through Title V Permit
7. Permittee shall maintain monthly records of amount of gas dehydrated and other records as required by Rule 4408. The permittee shall make such records readily available for District inspection upon request and shall be retained on the premises for a period of not less than five years. [District Rule 4408, 6.1.1, 6.1.2 and 6.1.4] 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.

8. Process heaters shall be fired exclusively by PUC quality natural gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
9. Permittee shall maintain operational records of standby process heaters FF-44-301 & FF-44-302, including date, time, and total amount of natural gas consumed. These records shall be made readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
10. All process vessels and lines handling volatile organic compounds shall vent only to other process vessels, District-approved flare, or substrata injection system. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total duration of process heater startup shall not exceed 2 hr/day. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
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13. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
14. Except during start-up and shutdown, emissions rates from process heater exhaust shall not exceed any of the following limits: 6 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.007 lb-NO<sub>x</sub>/MMBtu, 0.002 lb-SO<sub>x</sub>/MMBtu, 0.014 lb-PM<sub>10</sub>/MMBtu, 47 ppmvd @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
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21. Operation, calibration and data reduction for the CEM equipment shall be in accordance with the requirements of 40 CFR Part 51, 40 CFR Parts 60.7 and 60.13 (except subsection h), 40 CFR Part 60 Appendix B (Performance Specifications) and 40 CFR Part 60 Appendix F (Quality Assurance Procedures, and applicable provisions of Rule 1080 (Stack Monitoring). [District Rules 1080, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
22. CEM records shall be retained for at least 5 years. Records shall include occurrence and duration of start-up, shutdown or malfunction; performance testing, calibrations, checks, and maintenance of CEM; and emission measurements. [District Rule 1080] 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. Daily summaries of CEM records for each calendar quarter shall be submitted to the District within 30 days of the end of the calendar quarter. Hourly fuel stack gas flow rates and/or hourly fuel flow rates shall be measured during operation and included in quarterly reports. [District Rule 1080] Federally Enforceable Through Title V Permit
24. A report shall be submitted to the District within 30 days of the end of each calendar quarter identifying the time and date of each exceedance of emission limits, the excess emissions generated, and any conversion factor used to calculate emissions. [District Rule 1080] Federally Enforceable Through Title V Permit
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31. 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 4320. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
32. Continuous Emissions Monitoring System (CEMS) emissions measurements shall be averaged over a period of 15 consecutive minutes to demonstrate compliance with the applicable emission limits. Any 15-consecutive-minute block average CEMS measurement exceeding the applicable emission limits shall constitute a violation. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
33. Copies of all fuel invoices, gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
34. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO<sub>2</sub>, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
35. Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 140 lb/hr, calculated as NO<sub>2</sub>. [District Rules 4301, 5.2.2] Federally Enforceable Through Title V Permit
36. 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
37. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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38. 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, 4306, 4320] Federally Enforceable Through Title V Permit
39. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, 4320] Federally Enforceable Through Title V Permit
40. Stack gas oxygen shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
41. SOx emissions shall be determined using EPA Method 6C, EPA Method 8, or ARB Method 100. [District Rule 4320] Federally Enforceable Through Title V Permit
42. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: ASTM D 240-87 or D 2382-88 for liquid hydrocarbon fuels; ASTM D 1826-88 or D 1945-81 in conjunction with ASTM D 3588-89 for gaseous fuels. [District Rules 2520, 9.4.2, 4305, 4306, and 4320, 6.2.1] Federally Enforceable Through Title V Permit
43. NH3 emissions for source test purposes shall be determined using BAAQMD method ST-1B. [District Rule 4301] Federally Enforceable Through Title V Permit
44. 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, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit
45. 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 for sulfur content (as hydrogen sulfide). [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
46. 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
47. 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 (as hydrogen sulfide) of the gaseous fuel being fired in the unit shall be calculated using a continuous monitor averaged over a daily basis in accordance with SCAQMD Rule 431.1 Attachment A (as amended June 12, 1998). [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
48. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period. To demonstrate compliance with this requirement the operator shall do one of the following: fire the unit only on PUC or FERC regulated natural gas; or test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels; or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rule 2520, 9.3.2; County Rules 404 (Madera), 406 (Fresno), and 407 (Kern, Kings, Merced, San Joaquin, Stanislaus, and Tulare)] Federally Enforceable Through Title V Permit
49. The requirements of 40 CFR 60 Subpart LLL do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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