San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

JUL 30 2013

Mr. Brent Winn
Aera Energy, LLC
P.O. Box 11164
Bakersfield, CA 93389-1164

Re: Notice of Minor Title V Permit Modification
District Facility # S-1547
Project # S-1124253

Dear Mr. Winn:

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 S-1547-1062-10 into the Title V operating permit. The modification designated the unit a compliant dormant emissions unit.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued S-1547-1062-10, 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

TITLE V APPLICATION REVIEW

Minor Modification
Project #: S-1124253

Engineer: Kris Rickards
Date: July 16, 2013

Reviewed by AP SWR AQE
JUL 25 2013

Facility Number: S-1547
Facility Name: Aera Energy, LLC
Mailing Address: P.O. Box 11164
Bakersfield, CA 93389-1164

Contact Name: Brent Winn
Phone: 661-665-7437

Responsible Official: R. A. Roeder
Title: Process Supervisor

I. PROPOSAL

Aera Energy, LLC is proposing a Title V minor permit modification to incorporate the recently issued S-1547-1062-10 into the Title V operating permit. This modification designated the unit a compliant dormant emissions unit.

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 facility is located at Lost Hills cogeneration facility at Section 13, T26S, R20E within AERA's Heavy Oil Western Stationary Source.

III. EQUIPMENT DESCRIPTION

S-1547-1062-11: 3.5 MW COMBINED CYCLE GAS TURBINE TOPPING CYCLE COGENERATION WITH SELECTIVE CATALYTIC REDUCTION (SCR) LOST HILLS UNIT #6

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

Permit conditions 1 thru 6 on the draft PTO were added to allow this unit to enter a compliant (for Rule 4703) dormant status as follows:

- Permit condition 4 was added to the proposed Permit to Operate to specify that: While dormant, the fuel line shall be physically disconnected from the unit. (Adjust as necessary) [District Rule 2080]
- Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080]
- While dormant, normal source testing shall not be required. [District Rule 2080]
- Upon recommencing operation of this unit, normal source testing shall resume. [District Rule 2080]
- 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]
- 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]

Permit condition 33 on the draft PTO was revised to make it consistent with other turbine permits Aera operates as follows:

- The following test methods shall be used: NOx (ppmv) - EPA Methods 7E or 20, or ARB Method 100; CO (ppmv) - EPA Method 10 or 10B, or ARB Method 100; stack gas oxygen - EPA Method 3, 3A or 20, or ARB Method 100; and fuel gas sulfur content - ASTM D1072, D4468 or ASTM D3246 or double GC for H2S and mercaptans, fuel gas HHV ~~and LHV~~ - ASTM D3598-~~91~~, D1826-~~88~~ or D1945-~~81~~ in conjunction with ASTM D3588, Ammonia slip - BAAQMD method ST-1B. [40 CFR 60.335(b) and District Rules 1081 & 4703]

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

A. Proposed Modified Title V Operating Permit S-1547-1062-11
B. Authority to Construct S-1547-1062-10
C. Emissions Increases
D. Application
E. Previous Title V Operating Permit S-1547-1062-9

ATTACHMENT A

Proposed Modified Title V Operating Permit
(S-1547-1062-11)

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-1547-1062-11 **EXPIRATION DATE:** 05/31/2016

SECTION: 13 **TOWNSHIP:** 26S **RANGE:** 20E

EQUIPMENT DESCRIPTION:
3.5 MW COMBINED CYCLE GAS TURBINE TOPPING CYCLE COGENERATION WITH SELECTIVE CATALYTIC REDUCTION (SCR) LOST HILLS UNIT #6

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PERMIT UNIT REQUIREMENTS

1. While dormant, the fuel line shall be physically disconnected from the unit. (Adjust as necessary) [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. {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]
7. Cogeneration unit shall include Allison Model 501-KB-5 48.7 MMBTU/hr gas-fired engine, synchronous electrical generator, unfired 22.5 MMBTU/hr steam generator, and inlet air evaporative cooler. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Turbine lube oil tank and generator gearbox lube oil tank shall vent only through fiber bed filter system or other District-approved control Device. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Gas turbine engine shall be equipped with continuously recording fuel gas flowrate monitor. [40 CFR 60.334(a)] Federally Enforceable Through Title V Permit
10. Permittee shall install, operate and maintain in calibration a system which continuously measures and records elapsed time of turbine operation. [40 CFR 60.334(a) and District Rule 4703, 6.2.1] Federally Enforceable Through Title V Permit
11. Gas turbine engine shall be equipped with water injection system for NOx control. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Gas turbine engine water injection rate shall be maintained at a water-to-fuel ratio documented to result in compliance with emission limits. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Gas turbine engine shall be equipped with continuously recording water to fuel injection rate monitoring system accurate to within +/- 5%. [District Rule 2201& 40 CFR 60.334(a)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

14. If ammonia injection system is inoperative for more than 1 hour, gas turbine shall be shut down. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Evaporative cooler shall use only fresh and filtered water. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Maximum emission rate of volatile organic compounds (VOC's) from turbine lube oil vent shall not exceed 0.02 lb/hr. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Compliance testing of lube oil vent and gearbox vent shall be required if visible emissions from either vent exceeds 5% opacity or equivalent Ringelmann 1/4. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Waste heat recovery steam generator exhaust shall be equipped with permanent provisions to allow collection of gas samples consistent with EPA methods. [District Rule 1081] Federally Enforceable Through Title V Permit
19. The ammonia (NH3) emissions from the exhaust of the SCR system serving this gas turbine shall not exceed 20 ppmvd. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Permittee shall maintain accurate records of ammonia consumption. [District Rule 1070 and 4703] Federally Enforceable Through Title V Permit
21. Gas temperature at SCR catalyst section inlet shall be continuously monitored by operational temperature indicator. Inlet gas temperature to catalyst bed shall be maintained within range recommended by catalyst manufacturer and determined by performance tests. [40 CFR 60.334(a) and District Rule 4703, 6.2.1] Federally Enforceable Through Title V Permit
22. Permittee shall install, operate and maintain in calibration a system which continuously measures and records ammonia injection flow rate and pressure. Ammonia injection flow rate and pressure shall be operated within the range recommended by SCR manufacturer and determined by performance tests such that the turbine maintains 95% or greater control efficiency or complies with the applicable NOx emission concentration limit. [40 CFR 60.334(a) and District Rule 4703, 6.2.1] Federally Enforceable Through Title V Permit
23. Except during startup, shutdown, and reduced load periods, any one-hour period during which the average ammonia injection flowrate, as measured by the continuous monitoring system, falls outside the flowrate range as determined to demonstrate compliance shall be reported to the APCO. Each report shall include the average ammonia injection flowrate, average fuel consumption, ambient conditions, turbine gas load and nitrogen content of the fuel during the period of excess emissions. [40 CFR 60.334(c)] Federally Enforceable Through Title V Permit
24. Fuel gas sulfur content shall not exceed 19.5 ppmv as hydrogen sulfide (H2S) or 1.1 gr/100 scf as total fuel sulfur. [District Rule 2201] Federally Enforceable Through Title V Permit
25. Fuel sulfur content for a fuel source shall be measured weekly. Test reports of measured fuel sulfur content shall be maintained. If measured sulfur content is less than 1.1 gr/100 scf for 8 consecutive weeks for a fuel source, then the testing frequency shall be semi-annually. If any semi-annual testing show fuel sulfur content exceeds 1.1 gr/100 scf, weekly testing shall resume and exceedance shall be reported to APCO. [40 CFR 60.334(b)(c) & District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
26. Except during periods of startup and shutdown, emissions rates (three hour rolling average) shall not exceed any of the following: NOx (as NO2): 5 ppmv dry @ 15% O2, CO: 41 ppmv dry @ 15% O2. [District Rule 4703, 5.1.2, 5.2] Federally Enforceable Through Title V Permit
27. Startup and shutdown of the gas turbine, as defined in this permit and in 40 CFR Subpart A 60.2, shall not exceed a time period of two hours for startup and two hours for shutdown, per occurrence. Emission concentrations subsequent to this startup period shall not exceed the limits specified in this permit except during shutdown. [40 CFR Subpart A 60.2 and District Rule 4703] Federally Enforceable Through Title V Permit
28. The duration of reduced load shall not exceed a time period of one hour per occurrence. [District Rule 4703, 6.2.4] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

29. Emissions shall not exceed any of the following limits: NOx (as NO2); 150.7 lb/day, CO: 107.5 lb/day, PM10: 14.6 lb/day; SOx (as SO2): 3.8 lb/day or VOC: 39.6 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

30. Daily records of NOx and CO emission calculations during days of startup/shutdown shall be maintained and such records shall be made readily available for District inspection upon request. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

31. Maximum NOx (as NO2) and SOx (as SO2) emission rates (1 hr average) shall not exceed NSPS standard of 150 ppmv-dry @ 15% O2, and 150 ppmv-dry @ 15% O2, respectively. [40 CFR 60.332(a)(2) & 60.333(a)] Federally Enforceable Through Title V Permit

32. Source testing to measure exhaust gas NOx, CO, and NH3 concentrations and, if applicable, Selective Catalytic Reduction (SCR) control efficiency shall be conducted at least once every twelve (12) months (no more than 30 days before or after the required annual source test date). Performance testing shall be conducted under conditions representative of normal operation. [40 CFR 60.335(b), District Rule 4703, 6.3 & District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

33. The following test methods shall be used: NOx (ppmv) - EPA Methods 7E or 20, or ARB Method 100; CO (ppmv) - EPA Method 10 or 10B, or ARB Method 100; stack gas oxygen - EPA Method 3, 3A or 20, or ARB Method 100; and fuel gas sulfur content - ASTM D1072, D4468 or ASTM D3246 or double GC for H2S and mercaptans, fuel gas hhv - ASTM D3598, D1826 or D1945 in conjunction with ASTM D3588, Ammonia slip - BAAQMD method ST-1B. [40 CFR 60.335(b) and District Rules 1081 & 4703] Federally Enforceable Through Title V Permit

34. {593} All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Last 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

35. The District must be notified 30 days prior to any performance testing and a test plan shall be submitted for District approval 15 days prior to such testing. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit

36. Performance testing shall be witnessed or authorized District personnel. Test results must be submitted to the District within 60 day of performance testing. [District Rule 1081, 7.2, 7.3] Federally Enforceable Through Title V Permit

37. The permittee shall monitor and record the stack concentration of NOx, CO, NH3, and O2 at least once every month in which a source test is not performed. NOx, CO and O2 monitoring shall be conducted utilizing a portable analyzer that meets District specifications. NH3 monitoring shall be conducted utilizing Draeger tubes or a District approved equivalent method. 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 previous calendar month. [District Rule 4703] Federally Enforceable Through Title V Permit

38. If the NOx or CO concentrations corrected to 15% O2 as measured by the portable analyzer or the NH3 concentration, as measured by Draeger tubes or a District approved equivalent method, exceed the permitted levels the permittee shall return the emissions to compliant levels as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer or the ammonia monitoring equipment continue to show emission limit violations after 1 hour of operation following 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 that is subject to enforcement action has occurred. 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 Rule 4703] Federally Enforceable Through Title V Permit

39. Failure of catalyst to perform as required because of catalyst poisoning or fouling shall not be recognized as a basis for a Rule 1100 enforcement exemption. [District Rule 1070 and 4703] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

40. All NOx, CO, O2 and ammonia emission readings shall be taken with the unit operating at conditions representative of normal operation or under the conditions specified in the Permit to Operate. The NOx, CO and O2 analyzer as well as the NH3 emission monitoring equipment shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Analyzer 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 readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4703] Federally Enforceable Through Title V Permit

41. Ammonia emission readings shall be conducted at the time the NOx, CO and O2 readings are taken. [District Rule 4703] Federally Enforceable Through Title V Permit

42. The permittee shall maintain records of: (1) the date and time of NOx, CO, NH3 and O2 measurements, (2) the O2 concentration in percent by volume and the measured NOx, CO and NH3 concentrations corrected to 3% O2, (3) make and model of the portable analyzer, (4) portable analyzer calibration records, (5) the method of determining the NH3 emission concentration, and (6) a description of any corrective action taken to maintain the emissions at or below the acceptable levels. [District Rule 4703] Federally Enforceable Through Title V Permit

43. Permittee shall report the following emission exceedance to the District: emission rates of NOx & CO on a three-hour rolling average and NSPS emission rate on one hour average. [District Rule 1070, 2201 and 4703] Federally Enforceable Through Title V Permit

44. Operator shall maintain a stationary gas turbine operating log that includes, on a daily basis the actual local start-up and stop time, length and reason for reduced load periods, total hours of operation and quantity of fuel used. During days of gas turbine startup/shutdown, permittee shall maintain accurate daily records of natural gas consumption for normal operation and for the startup/shutdown periods. This information may be recorded electronically. Daily entries in the operating log are not required for periods of non-operation. [District Rules 2520, 9.4.2 & 4703, 6.2.4] Federally Enforceable Through Title V Permit

45. Permittee shall maintain accurate records of all maintenance activities, periodic inspections, and repairs of SCR unit, water and NH3 injection systems, and their associated controller and instrumentation units. [District Rules 1070 and 4703] Federally Enforceable Through Title V Permit

46. Permittee shall comply in full with Rule 4001 (New Source Performance Standards, 40 CFR 60 Subpart GG) requirements, including notification, recordkeeping and monitoring requirements. [District Rule 4001] Federally Enforceable Through Title V Permit

47. The owner or operator shall maintain all records for a period of five years from the date of entry and shall make such records available to the APCO upon request. [District Rules 1080, 2201, & 4703, 6.2.4] Federally Enforceable Through Title V Permit

48. Note: Formerly S-1129-52.

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ATTACHMENT B

Authority to Construct
(S-1547-1062-10)

AUTHORITY TO CONSTRUCT

PERMIT NO: S-1547-1062-10 **ISSUANCE DATE:** 09/24/2012

LEGAL OWNER OR OPERATOR: AERA ENERGY LLC
MAILING ADDRESS: PO BOX 11164
BAKERSFIELD, CA 93389-1164

LOCATION: HEAVY OIL WESTERN STATIONARY SOURCE
KERN COUNTY, CA

SECTION: 13 **TOWNSHIP:** 26S **RANGE:** 20E

EQUIPMENT DESCRIPTION:
MODIFICATION OF 3.5 MW COMBINED CYCLE GAS TURBINE TOPPING CYCLE COGENERATION WITH SELECTIVE CATALYTIC REDUCTION (SCR) LOST HILLS UNIT #6: DESIGNATE 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 line shall be physically disconnected from the unit. (Adjust as necessary) [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. Cogeneration unit shall include Allison Model 501-KB-5 48.7 MMBTU/hr gas-fired engine, synchronous electrical generator, unfired 22.5 MMBTU/hr steam generator, and inlet air evaporative cooler. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services
S-1547-1062-10 : Jul 16 2013 1:24PM -- RICKARDK : Joint Inspection NOT Required

9. Turbine lube oil tank and generator gearbox lube oil tank shall vent only through fiber bed filter system or other District-approved control Device. [District Rule 2201] Federally Enforceable Through Title V Permit

10. Gas turbine engine shall be equipped with continuously recording fuel gas flowrate monitor. [40 CFR 60.334(a)] Federally Enforceable Through Title V Permit

11. Permittee shall install, operate and maintain in calibration a system which continuously measures and records elapsed time of turbine operation. [40 CFR 60.334(a) and District Rule 4703, 6.2.1] Federally Enforceable Through Title V Permit

12. Gas turbine engine shall be equipped with water injection system for NOx control. [District Rule 2201] Federally Enforceable Through Title V Permit

13. Gas turbine engine water injection rate shall be maintained at a water-to-fuel ratio documented to result in compliance with emission limits. [District Rule 2201] Federally Enforceable Through Title V Permit

14. Gas turbine engine shall be equipped with continuously recording water to fuel injection rate monitoring system accurate to within +/- 5%. [District Rule 2201& 40 CFR 60.334(a)] Federally Enforceable Through Title V Permit

15. If ammonia injection system is inoperative for more than 1 hour, gas turbine shall be shut down. [District Rule 2201] Federally Enforceable Through Title V Permit

16. Evaporative cooler shall use only fresh and filtered water. [District Rule 2201] Federally Enforceable Through Title V Permit

17. Maximum emission rate of volatile organic compounds (VOC's) from turbine lube oil vent shall not exceed 0.02 lb/hr. [District Rule 2201] Federally Enforceable Through Title V Permit

18. Compliance testing of lube oil vent and gearbox vent shall be required if visible emissions from either vent exceeds 5% opacity or equivalent Ringelmann 1/4. [District Rule 2201] Federally Enforceable Through Title V Permit

19. Waste heat recovery steam generator exhaust shall be equipped with permanent provisions to allow collection of gas samples consistent with EPA methods. [District Rule 1081] Federally Enforceable Through Title V Permit

20. The ammonia (NH3) emissions from the exhaust of the SCR system serving this gas turbine shall not exceed 20 ppmvd. [District Rule 2201] Federally Enforceable Through Title V Permit

21. Permittee shall maintain accurate records of ammonia consumption. [District Rule 1070 and 4703] Federally Enforceable Through Title V Permit

22. Gas temperature at SCR catalyst section inlet shall be continuously monitored by operational temperature indicator. Inlet gas temperature to catalyst bed shall be maintained within range recommended by catalyst manufacturer and determined by performance tests. [40 CFR 60.334(a) and District Rule 4703, 6.2.1] Federally Enforceable Through Title V Permit

23. Permittee shall install, operate and maintain in calibration a system which continuously measures and records ammonia injection flow rate and pressure. Ammonia injection flow rate and pressure shall be operated within the range recommended by SCR manufacturer and determined by performance tests such that the turbine maintains 95% or greater control efficiency or complies with the applicable NOx emission concentration limit. [40 CFR 60.334(a) and District Rule 4703, 6.2.1] Federally Enforceable Through Title V Permit

24. Except during startup, shutdown, and reduced load periods, any one-hour period during which the average ammonia injection flowrate, as measured by the continuous monitoring system, falls outside the flowrate range as determined to demonstrate compliance shall be reported to the APCO. Each report shall include the average ammonia injection flowrate, average fuel consumption, ambient conditions, turbine gas load and nitrogen content of the fuel during the period of excess emissions. [40 CFR 60.334(c)] Federally Enforceable Through Title V Permit

25. Fuel gas sulfur content shall not exceed 19.5 ppmv as hydrogen sulfide (H2S) or 1.1 gr/100 scf as total fuel sulfur. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

26. Fuel sulfur content for a fuel source shall be measured weekly. Test reports of measured fuel sulfur content shall be maintained. If measured sulfur content is less than 1.1 gr/100 scf for 8 consecutive weeks for a fuel source, then the testing frequency shall be semi-annually. If any semi-annual testing show fuel sulfur content exceeds 1.1 gr/100 scf, weekly testing shall resume and exceedance shall be reported to APCO. [40 CFR 60.334(b)(c) & District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

27. Except during periods of startup and shutdown, emissions rates (three hour rolling average) shall not exceed any of the following: NOx (as NO2): 5 ppmv dry @ 15% O2, CO: 41 ppmv dry @ 15% O2. [District Rule 4703, 5.1.2, 5.2] Federally Enforceable Through Title V Permit

28. Startup and shutdown of the gas turbine, as defined in this permit and in 40 CFR Subpart A 60.2, shall not exceed a time period of two hours for startup and two hours for shutdown, per occurrence. Emission concentrations subsequent to this startup period shall not exceed the limits specified in this permit except during shutdown. [40 CFR Subpart A 60.2 and District Rule 4703] Federally Enforceable Through Title V Permit

29. The duration of reduced load shall not exceed a time period of one hour per occurrence. [District Rule 4703, 6.2.4] Federally Enforceable Through Title V Permit

30. Emissions shall not exceed any of the following limits: NOx (as NO2); 150.7 lb/day, CO: 107.5 lb/day, PM10: 14.6 lb/day; SOx (as SO2): 3.8 lb/day or VOC: 39.6 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

31. Daily records of NOx and CO emission calculations during days of startup/shutdown shall be maintained and such records shall be made readily available for District inspection upon request. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

32. Maximum NOx (as NO2) and SOx (as SO2) emission rates (1 hr average) shall not exceed NSPS standard of 150 ppmv-dry @ 15% O2, and 150 ppmv-dry @ 15% O2, respectively. [40 CFR 60.332(a)(2) & 60.333(a)] Federally Enforceable Through Title V Permit

33. Source testing to measure exhaust gas NOx, CO, and NH3 concentrations and, if applicable, Selective Catalytic Reduction (SCR) control efficiency shall be conducted at least once every twelve (12) months (no more than 30 days before or after the required annual source test date). Performance testing shall be conducted under conditions representative of normal operation. [40 CFR 60.335(b), District Rule 4703, 6.3 & District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

34. The following test methods shall be used: NOx (ppmv) - EPA Methods 7E or 20, or ARB Method 100; CO (ppmv) - EPA Method 10 or 10B, or ARB Method 100; stack gas oxygen - EPA Method 3, 3A or 20, or ARB Method 100; and fuel gas sulfur content - ASTM D1072, D4468 or ASTM D3246 or double GC for H2S and mercaptans, fuel gas hhv - ASTM D3598, D1826 or D1945 in conjunction with ASTM D3588, Ammonia slip - BAAQMD method ST-1B. [40 CFR 60.335(b) and District Rules 1081 & 4703] Federally Enforceable Through Title V Permit

35. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Last 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. The District must be notified 30 days prior to any performance testing and a test plan shall be submitted for District approval 15 days prior to such testing. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit

37. Performance testing shall be witnessed or authorized District personnel. Test results must be submitted to the District within 60 day of performance testing. [District Rule 1081, 7.2, 7.3] Federally Enforceable Through Title V Permit

38. The permittee shall monitor and record the stack concentration of NOx, CO, NH3, and O2 at least once every month in which a source test is not performed. NOx, CO and O2 monitoring shall be conducted utilizing a portable analyzer that meets District specifications. NH3 monitoring shall be conducted utilizing Draeger tubes or a District approved equivalent method. 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 previous calendar month. [District Rule 4703] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

39. If the NOx or CO concentrations corrected to 15% O2 as measured by the portable analyzer or the NH3 concentration, as measured by Draeger tubes or a District approved equivalent method, exceed the permitted levels the permittee shall return the emissions to compliant levels as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer or the ammonia monitoring equipment continue to show emission limit violations after 1 hour of operation following 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 that is subject to enforcement action has occurred. 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 Rule 4703] Federally Enforceable Through Title V Permit

40. Failure of catalyst to perform as required because of catalyst poisoning or fouling shall not be recognized as a basis for a Rule 1100 enforcement exemption. [District Rule 1070 and 4703] Federally Enforceable Through Title V Permit

41. All NOx, CO, O2 and ammonia emission readings shall be taken with the unit operating at conditions representative of normal operation or under the conditions specified in the Permit to Operate. The NOx, CO and O2 analyzer as well as the NH3 emission monitoring equipment shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Analyzer 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 readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4703] Federally Enforceable Through Title V Permit

42. Ammonia emission readings shall be conducted at the time the NOx, CO and O2 readings are taken. [District Rule 4703] Federally Enforceable Through Title V Permit

43. The permittee shall maintain records of: (1) the date and time of NOx, CO, NH3 and O2 measurements, (2) the O2 concentration in percent by volume and the measured NOx, CO and NH3 concentrations corrected to 3% O2, (3) make and model of the portable analyzer, (4) portable analyzer calibration records, (5) the method of determining the NH3 emission concentration, and (6) a description of any corrective action taken to maintain the emissions at or below the acceptable levels. [District Rule 4703] Federally Enforceable Through Title V Permit

44. Permittee shall report the following emission exceedance to the District: emission rates of NOx & CO on a three-hour rolling average and NSPS emission rate on one hour average. [District Rule 1070, 2201 and 4703] Federally Enforceable Through Title V Permit

45. Operator shall maintain a stationary gas turbine operating log that includes, on a daily basis the actual local start-up and stop time, length and reason for reduced load periods, total hours of operation and quantity of fuel used. During days of gas turbine startup/shutdown, permittee shall maintain accurate daily records of natural gas consumption for normal operation and for the startup/shutdown periods. This information may be recorded electronically. Daily entries in the operating log are not required for periods of non-operation. [District Rules 2520, 9.4.2 & 4703, 6.2.4] Federally Enforceable Through Title V Permit

46. Permittee shall maintain accurate records of all maintenance activities, periodic inspections, and repairs of SCR unit, water and NH3 injection systems, and their associated controller and instrumentation units. [District Rules 1070 and 4703] Federally Enforceable Through Title V Permit

47. Permittee shall comply in full with Rule 4001 (New Source Performance Standards, 40 CFR 60 Subpart GG) requirements, including notification, recordkeeping and monitoring requirements. [District Rule 4001] Federally Enforceable Through Title V Permit

48. The owner or operator shall maintain all records for a period of five years from the date of entry and shall make such records available to the APCO upon request. [District Rules 1080, 2201, & 4703, 6.2.4] Federally Enforceable Through Title V Permit

49. Note: Formerly S-1129-52.

ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
S-1547-1062	0	0	0	0	0
TOTAL	**0**	**0**	**0**	**0**	**0**

ATTACHMENT D

Application

RECEIVED

NOV 2 0 2012

SJVAPCD
Southern Region

San Joaquin Valley Air Pollution Control District

APPLICATION FOR TITLE V MODIFICATION:

[ ] ADMINISTRATIVE AMENDMENT
[X] MINOR MODIFICATION
[ ] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: AERA ENERGY LLC	
2. MAILING ADDRESS: STREET/P.O. BOX: P.O. BOX 11164 CITY: STATE: CA 9-DIGIT ZIP CODE: 93389-1164	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: Belridge Oilfield, Heavy Oil Western Source (S-1547) CITY: 1/4 SECTION 13 TOWNSHIP 26S RANGE 20E	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: Oil and Gas Production	
5. EQUIPMENT FOR WHICH APPLICATION IS MADE (Include Permit Nos.): Convert ATC S-1547-1062-10 (Add dormant conditions for Cogen 13 Unit 6) to Title V Permit to Operate (Use additional sheets if necessary)	
6. DO YOU REQUEST A CERTIFICATE OF CONFORMITY WITH THIS ACTION? [ ] YES [X] NO	
7. IS THIS APPLICATION SUBMITTED AS A RESULT OF A NOV/NTC? [ ] YES [X] NO NOV/NTC No.:	
8. SIGNATURE OF APPLICANT/CONTACT PERSON: Brent Winn	TYPE OR PRINT TITLE OF APPLICANT: Environmental Engineer
9. TYPE OR PRINT NAME OF APPLICANT/CONTACT: Brent Winn	DATE: 11/19/12
10. FAX NUMBER: (661) 665-7437	TELEPHONE NUMBER: (661) 665-4363

FOR APCD USE ONLY:

DATE STAMP	FILING FEE RECEIVED: $ _____/ DATE PAID: _____ PROJECT NO.: S-1124253 FACILITY REGION & ID: S-1547

Title V - Minor Mod

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
[X] MINOR PERMIT MODIFICATION
[ ] ADMINISTRATIVE AMENDMENT

Add dormant conditions for Cogen 13 Unit 6

COMPANY NAME: **AERA ENERGY LLC**	FACILITY ID: **S - 1547**
1. Type of Organization: [X] Corporation [ ] Sole Ownership [ ] Government [ ] Partnership [ ] Utility	
2. Owner's Name: **AERA ENERGY LLC**	
3. Agent to the Owner: **N/A**	

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

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

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

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

(4) 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

R. A. Roeder
Name of Responsible Official (please print)

Process Supervisor
Title of Responsible Official (please print)

ATTACHMENT E

Previous Title V Operating Permit
(S-1547-1062-9)

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-1547-1062-9 **EXPIRATION DATE:** 05/31/2016

SECTION: 13 **TOWNSHIP:** 26S **RANGE:** 20E

EQUIPMENT DESCRIPTION:
3.5 MW COMBINED CYCLE GAS TURBINE TOPPING CYCLE COGENERATION WITH SELECTIVE CATALYTIC REDUCTION (SCR) LOST HILLS UNIT #6

PERMIT UNIT REQUIREMENTS

1. Cogeneration unit shall include Allison Model 501-KB-5 48.7 MMBTU/hr gas-fired engine, synchronous electrical generator, unfired 22.5 MMBTU/hr steam generator, and inlet air evaporative cooler. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Turbine lube oil tank and generator gearbox lube oil tank shall vent only through fiber bed filter system or other District-approved control Device. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Gas turbine engine shall be equipped with continuously recording fuel gas flowrate monitor. [40 CFR 60.334(a)] Federally Enforceable Through Title V Permit
4. Permittee shall install, operate and maintain in calibration a system which continuously measures and records elapsed time of turbine operation. [40 CFR 60.334(a) and District Rule 4703, 6.2.1] Federally Enforceable Through Title V Permit
5. Gas turbine engine shall be equipped with water injection system for NOx control. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Gas turbine engine water injection rate shall be maintained at a water-to-fuel ratio documented to result in compliance with emission limits. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Gas turbine engine shall be equipped with continuously recording water to fuel injection rate monitoring system accurate to within +/- 5%. [District Rule 2201& 40 CFR 60.334(a)] Federally Enforceable Through Title V Permit
8. If ammonia injection system is inoperative for more than 1 hour, gas turbine shall be shut down. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Evaporative cooler shall use only fresh and filtered water. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Maximum emission rate of volatile organic compounds (VOC's) from turbine lube oil vent shall not exceed 0.02 lb/hr. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Compliance testing of lube oil vent and gearbox vent shall be required if visible emissions from either vent exceeds 5% opacity or equivalent Ringelmann 1/4. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Waste heat recovery steam generator exhaust shall be equipped with permanent provisions to allow collection of gas samples consistent with EPA methods. [District Rule 1081] Federally Enforceable Through Title V Permit
13. The ammonia (NH3) emissions from the exhaust of the SCR system serving this gas turbine shall not exceed 20 ppmvd. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Permittee shall maintain accurate records of ammonia consumption. [District Rule 1070 and 4703] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

15. Gas temperature at SCR catalyst section inlet shall be continuously monitored by operational temperature indicator. Inlet gas temperature to catalyst bed shall be maintained within range recommended by catalyst manufacturer and determined by performance tests. [40 CFR 60.334(a) and District Rule 4703, 6.2.1] Federally Enforceable Through Title V Permit

16. Permittee shall install, operate and maintain in calibration a system which continuously measures and records ammonia injection flow rate and pressure. Ammonia injection flow rate and pressure shall be operated within the range recommended by SCR manufacturer and determined by performance tests such that the turbine maintains 95% or greater control efficiency or complies with the applicable NOx emission concentration limit. [40 CFR 60.334(a) and District Rule 4703, 6.2.1] Federally Enforceable Through Title V Permit

17. Except during startup, shutdown, and reduced load periods, any one-hour period during which the average ammonia injection flowrate, as measured by the continuous monitoring system, falls outside the flowrate range as determined to demonstrate compliance shall be reported to the APCO. Each report shall include the average ammonia injection flowrate, average fuel consumption, ambient conditions, turbine gas load and nitrogen content of the fuel during the period of excess emissions. [40 CFR 60.334(c)] Federally Enforceable Through Title V Permit

18. Fuel gas sulfur content shall not exceed 19.5 ppmv as hydrogen sulfide (H2S) or 1.1 gr/100 scf as total fuel sulfur. [District Rule 2201] Federally Enforceable Through Title V Permit

19. Fuel sulfur content for a fuel source shall be measured weekly. Test reports of measured fuel sulfur content shall be maintained. If measured sulfur content is less than 1.1 gr/100 scf for 8 consecutive weeks for a fuel source, then the testing frequency shall be semi-annually. If any semi-annual testing show fuel sulfur content exceeds 1.1 gr/100 scf, weekly testing shall resume and exceedance shall be reported to APCO. [40 CFR 60.334(b)(c) & District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

20. Except during periods of startup and shutdown, emissions rates (three hour rolling average) shall not exceed any of the following: NOx (as NO2): 5 ppmv dry @ 15% O2, CO: 41 ppmv dry @ 15% O2. [District Rule 4703, 5.1.2, 5.2] Federally Enforceable Through Title V Permit

21. Startup and shutdown of the gas turbine, as defined in this permit and in 40 CFR Subpart A 60.2, shall not exceed a time period of two hours for startup and two hours for shutdown, per occurrence. Emission concentrations subsequent to this startup period shall not exceed the limits specified in this permit except during shutdown. [40 CFR Subpart A 60.2 and District Rule 4703] Federally Enforceable Through Title V Permit

22. The duration of reduced load shall not exceed a time period of one hour per occurrence. [District Rule 4703, 6.2.4] Federally Enforceable Through Title V Permit

23. Emissions shall not exceed any of the following limits: NOx (as NO2); 150.7 lb/day, CO: 107.5 lb/day, PM10: 14.6 lb/day; SOx (as SO2): 3.8 lb/day or VOC: 39.6 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

24. Daily records of NOx and CO emission calculations during days of startup/shutdown shall be maintained and such records shall be made readily available for District inspection upon request. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

25. Maximum NOx (as NO2) and SOx (as SO2) emission rates (1 hr average) shall not exceed NSPS standard of 150 ppmv-dry @ 15% O2, and 150 ppmv-dry @ 15% O2, respectively. [40 CFR 60.332(a)(2) & 60.333(a)] Federally Enforceable Through Title V Permit

26. Source testing to measure exhaust gas NOx, CO, and NH3 concentrations and, if applicable, Selective Catalytic Reduction (SCR) control efficiency shall be conducted at least once every twelve (12) months (no more than 30 days before or after the required annual source test date). Performance testing shall be conducted under conditions representative of normal operation. [40 CFR 60.335(b), District Rule 4703, 6.3 & District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

27. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or 20, CO (ppmv) - EPA Method 10 or 10B, stack gas oxygen - EPA Method 3 or 3A or 20, fuel gas sulfur content - ASTM D1072, D4468, or D3246 or double GC for H2S and mercaptans, fuel gas HHV and LHV - ASTM D3598-91, D1826-88 or D1945-81, Ammonia slip - BAAQMD method ST-1B. [40 CFR 60.335(b) and District Rules 1081 & 4703] Federally Enforceable Through Title V Permit

28. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Last 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

29. The District must be notified 30 days prior to any performance testing and a test plan shall be submitted for District approval 15 days prior to such testing. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit

30. Performance testing shall be witnessed or authorized District personnel. Test results must be submitted to the District within 60 day of performance testing. [District Rule 1081, 7.2, 7.3] Federally Enforceable Through Title V Permit

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41. The owner or operator shall maintain all records for a period of five years from the date of entry and shall make such records available to the APCO upon request. [District Rules 1080, 2201, & 4703, 6.2.4] Federally Enforceable Through Title V Permit

42. Note: Formerly S-1129-52.