



AUG 07 2013

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

Re: Notice of Minor Title V Permit Modification
District Facility # S-1547
Project # S-~~4432597~~ 1132957

Dear Mr. Winn:

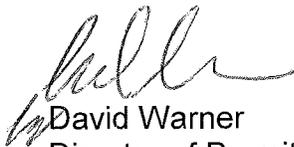
Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued ATCs #S-1547-761-17 and '803-11 into the Title V operating permit. The Authority to Construct (ATC) permits authorized the steam generators to reduce their maximum NOx emissions to 9 ppm which is the Rule 4320 allowable limit for units firing on less than 50%, by volume, PUC quality gas.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued ATCs #S-1547-761-17 and '803-11, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Thank you for your cooperation in this matter.

Sincerely,



David Warner
Director of Permit Services

Enclosures

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

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

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

TITLE V APPLICATION REVIEW

Minor Modification

Project #: S-1547, 1132957

Engineer: Steve Davidson

Date: August 5, 2013

Facility Number: S-1547
Facility Name: Area Energy, LLC
Mailing Address: PO Box 11164
Bakersfield, CA 93389-1164

RWK
8-6-13

Contact Name: Brent Winn
Phone: (661) 665-4363

Responsible Official: E.J Gonzales
Title: Process Supervisor

I. PROPOSAL

Area Energy, LLC is proposing a Title V minor permit modification to incorporate Authorities to Construct (ATC) #S-1547-761-17, and '-803-11 into Aera Energy's Title V permit. These ATCs authorized the steam generators to reduce their maximum NOx emissions to 9 ppm which is the Rule 4320 allowable limit for units firing on less than 50%, by volume, PUC quality gas.

Conditions will be placed on the permit to ensure the units make the requirements of this category.

II. FACILITY LOCATION

The equipment is located in the Belridge oilfield of Aera's Western Kern County fields' heavy oil production stationary source, facility S-1547.

PTO#	Field	Section	Township	Range
S-1547-761-25	Belridge	NE3	29S	21E
S-1547-803-19	Belridge	NE3	29S	21E

III. EQUIPMENT DESCRIPTION

S-1547-761-25: 62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR, WITH A COEN ULN BURNER, FLUE GAS RECIRCULATION, AND NON-CONDENSIBLE PIPING FROM VAPOR CONTROL SYSTEM S-1547-359. (#3-2M) (BELRIDGE)

S-1547-803-19: 62.5 MMBTU/HR GAS-FIRED STEAM GENERATOR, WITH A COEN QLN-ULN LOW-NOX BURNER ASSEMBLY, FLUE GAS RECIRCULATION, OXYGEN MONITOR/CONTROLLER, AND NON-CONDENSIBLE PIPING FROM VAPOR CONTROL SYSTEM S-1547-359 (BELRIDGE #3-20)

IV. SCOPE OF EPA AND PUBLIC REVIEW

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

V. APPLICABLE REQUIREMENTS

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

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

The Authority to Construct (ATC) permits authorized the steam generators to reduce their maximum NOx emissions to 9 ppm which is the Rule 4320 allowable limit for units firing on less than 50%, by volume, PUC quality gas. Conditions will be placed on the permit to ensure the units make the requirements of this category.

Condition # on PTO S-1547-761-24	Condition # on Propose PTO S-1547-761-25	Condition is New, Modified, or Removed	Reason for Change from Current PTO
--	7	New	Condition requiring natural gas and a TEOR non-condensable gas flow meter added to the permit
14	14	Modified	Condition stating PM10 and SOx emissions limits when fired exclusively on natural gas modified to exclude periods of startup, shut down and refractory curing
16	16	Modified	NOx Limit lowered to 0.011 lb/MMBtu or 9 ppm
18	19	Modified	Condition limiting NOx emissions limiting annual NOx emissions lowered from 7495 lb/yr to 5889 lb/yr.

Condition # on PTO S-1547-803-18	Condition # on Propose PTO S-1547-803-19	Condition is New, Modified, or Removed	Reason for Change from Current PTO
--	13	New	Condition stating PM10 and SOx emissions limits when fired exclusively on natural gas modified to exclude start up, shut down and refractory curing
15	15	Modified	NOx Limit lowered to 0.011 lb/MMBtu or 9 ppm
18	17	New	Condition limiting NOx emissions limiting annual NOx emissions lowered from 7495 lb/yr to 5889 lb/yr.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

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

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

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

VIII. ATTACHMENTS

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

ATTACHMENT A

Proposed Modified Title V Operating Permit #
S-1547-761-25 and '-803-19

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-761-25

EXPIRATION DATE: 05/31/2016

SECTION: NE03 **TOWNSHIP:** 29S **RANGE:** 21E

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR, WITH A COEN ULN BURNER, FLUE GAS RECIRCULATION, AND NON-CONDENSIBLE PIPING FROM VAPOR CONTROL SYSTEM S-1547-359. (#3-2M) (BELRIDGE)

PERMIT UNIT REQUIREMENTS

1. Copies of all fuel invoices showing quantity and delivery points of gas delivered and copies of quality terms of gas delivery contracts 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, 9.3.2] Federally Enforceable Through Title V Permit
2. {520} The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit
3. {557} When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
4. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, the following test methods (or other approved methods listed in this permit) shall be used; H2S: ASTM D6228 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory; total sulfur: ASTM 1072, D3246, D4084 or D6228; and methane content: ASTM D1945. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
5. The operator shall demonstrate compliance with this unit's sulfur compound exhaust concentration limit(s) using one of the following: test the sulfur content of each fuel source, 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 Rules 2520, 9.4.2, 4301, 5.2.1 and Rule 4801, 3.1] Federally Enforceable Through Title V Permit
6. {565} Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of 40 CFR 60, Subpart Dc (except 60.44c(g) and (h) and 60.48c). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
7. Unit shall be equipped with the following: natural gas volume flowmeter and a TEOR non-condensable gas volume flowmeter. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The PUC quality/produced natural gas line and CVR/waste gas line shall each be equipped with a volumetric fuel meter. Permittee shall maintain monthly records of the percentage by volume of PUC quality natural gas burned in the unit. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
9. Only natural gas or a combination of natural gas and scrubbed non-condensable gas from sulfur scrubbing system(s) S-1547-359 shall be used as fuel in this steam generator. [District NSR Rule] 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. Steam generator shall be operated at no greater than 1,466.7 MMBtu hhv/day heat input. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Maximum TEOR gas flow rate for this unit shall not exceed 1,300 Mcf/day. [District NSR Rule] Federally Enforceable Through Title V Permit
12. The total fuel burned in this unit shall be less than 50% by volume PUC quality natural gas determined on a calendar month basis. PUC quality natural gas is any gaseous fuel where the sulfur content is no more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet, no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet, and at least 80% methane by volume. [District Rule 4320] Federally Enforceable Through Title V Permit
13. Fuel H₂S, total sulfur, and methane content shall be determined semi-annually using the following test methods H₂S: ASTM D6228; total sulfur: ASTM D1072; ASTM D3246, or ASTM D6228; and methane content: ASTM D1945. [District Rule 4320] Federally Enforceable Through Title V Permit
14. When natural gas and TEOR gas fired, except during startup, shutdown, and refractory curing, maximum PM₁₀ emissions shall not exceed the lb/hr limit calculated as follows: $PM_{10} = \{(7.0 \text{ lb/day}) + (249.2 \text{ lb/day}) \times (\text{fraction of total TEOR gas incinerated in this unit during testing})\} / (24 \text{ hr/day})$. [District Rules 2201, 2520, 4201 and 4301] Federally Enforceable Through Title V Permit
15. Emission rates, except during startup, shutdown, and refractory curing shall not exceed any of the following: VOC: 0.003 lb/MMBtu, NO_x (as NO₂): 0.011 lb/MMBtu or 9 ppmv @ 3% O₂, or CO: 0.030 lb/MMBtu or 40 ppmv @ 3% O₂. [District Rules 2201, 2520, 4301, 4305, 4306, 4320, 4405 and Kern County Rule 425] Federally Enforceable Through Title V Permit
16. Sulfur content of all fuel gas sources combined shall not exceed 5 gr-S/100 dscf. [District Rule 4320 and Kern County Rule 424] Federally Enforceable Through Title V Permit
17. Emission rates during startup, shutdown and refractory curing shall not exceed: particulate matter - 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO₂; sulfur - 200 pounds of SO₂ per hour, or 2000 ppmv as SO₂, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO₂ - 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4101, 4102, 4301, 4405, 4406, 4801 and Kern County Rules 424 and 425] Federally Enforceable Through Title V Permit
18. Emission rates shall not exceed any of the following: PM₁₀: 240.0 lb/day, VOC: 4.4 lb/day, NO_x (as NO₂): 52.8 lb/day or 5889 lb/year, or CO: 44.0 lb/day [District Rules 2201 and 4301, 5.2.1 and 5.2.3] Federally Enforceable Through Title V Permit
19. Duration of startup and shutdown (as defined in Rule 4320) shall not exceed 2 hours each per occurrence. Refractory curing period is defined as a maintenance-based reduced-load period of time during which a unit is brought from a shutdown status to staged rates of firing for the sole purpose of curing new refractory lining of the unit, and shall not exceed 30 hours per occurrence. The operator shall maintain records of the duration of start-up, shutdown, and refractory curing periods. [District Rules 4305, 4306 and 4320]
20. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit

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

21. If either the NO_x or CO concentrations corrected to 3% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100 (amended December 17, 1992), the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 5.4.2; 4306, 5.4.2; and 4320, 5.7.1] Federally Enforceable Through Title V Permit
22. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
23. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
24. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise 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. For the purposes of permittee-performed alternate monitoring, emissions measurements may be performed at any time after the unit reaches conditions representative of normal operation. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
25. Compliance with fuel sulfur limit(s) can be demonstrated either by monitoring sulfur content at location(s) after all fuel sources are combined prior to incineration, or by monitoring the sulfur content and volume of each fuel source and performing mass balance calculations. Records of monitoring locations, detected sulfur concentrations, and mass balance calculations, if necessary, shall be maintained and kept onsite and made readily available for District inspection upon request. [District Rule 4320] Federally Enforceable Through Title V Permit
26. Source testing to measure natural gas-combustion NO_x and CO emissions from this unit shall be conducted at least once every twelve (12) months (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months (no more than 30 days before or after the required 36-month source test date). If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
27. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
28. 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. 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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29. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SO_x (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - EPA Method 11 or 15, ASTM D3246 or double GC for H₂S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 1081, 4305, 4306, and 4320]
30. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
31. All records shall be maintained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit
32. Permittee shall maintain accurate records of heating values (in Btu/scf) and daily consumption of natural gas/TEOR waste gas, and such records shall be made readily available for District inspection upon request for a period of five years. [District NSR Rule, District Rule 1070] Federally Enforceable Through Title V Permit
33. NOTE: There are no sulfur compounds daily emission limits (DELs) expressed on this permit for incineration of TEOR gas, sulfur compounds emissions are limited by DELs on permit S-1547-359.
34. NOTE: Formerly S-1511-118

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

DRAFT

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-803-19

EXPIRATION DATE: 05/31/2016

SECTION: NE03 TOWNSHIP: 29S RANGE: 21E

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR GAS-FIRED STEAM GENERATOR, WITH A COEN QLN-ULN LOW-NOX BURNER ASSEMBLY, FLUE GAS RECIRCULATION, OXYGEN MONITOR/CONTROLLER, AND NON-CONDENSIBLE PIPING FROM VAPOR CONTROL SYSTEM S-1547-359 (BELRIDGE #3-20)

PERMIT UNIT REQUIREMENTS

1. Copies of all fuel invoices showing quantity and delivery points of gas delivered and copies of quality terms of gas delivery contracts 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, 9.3.2] Federally Enforceable Through Title V Permit
2. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
3. The total fuel burned in this unit shall be less than 50% by volume PUC quality natural gas determined on a calendar month basis. PUC quality natural gas is any gaseous fuel where the sulfur content is no more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet, no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet, and at least 80% methane by volume. [District Rule 4320] Federally Enforceable Through Title V Permit
4. Fuel H₂S, total sulfur, and methane content shall be determined semi-annually. [District Rule 4320] Federally Enforceable Through Title V Permit
5. If the unit is fired on noncertified gaseous fuel and compliance with SO_x emission limits is achieved through fuel sulfur content limitations, the following test methods (or other approved methods listed in this permit) shall be used; H₂S: ASTM D6228 or grab sample analysis by double GC for H₂S and mercaptans performed in the laboratory; total sulfur: ASTM 1072, D3246, D4084 or D6228; and methane content: ASTM D1945. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
6. {557} When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
7. If fuel analysis is used to demonstrate compliance with conditions of this permit, the fuel higher heating value for each fuel shall be certified by a third party fuel supplier or determined by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.4.2; 4305, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit
8. {565} Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of 40 CFR 60, Subpart Dc (except 60.44c(g) and (h) and 60.48c). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

9. The PUC quality/produced natural gas line and CVR/waste gas line shall each be equipped with a volumetric fuel meter. Permittee shall maintain monthly records of the percentage by volume of PUC quality natural gas burned in the unit. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
10. Only natural gas or a combination of natural gas and scrubbed non-condensable gas from sulfur scrubbing system(s) S-1547-359 shall be used as fuel in this steam generator. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Steam generator shall be operated at no greater than 1,466.7 MMBtu hhv/day heat input. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Maximum TEOR gas flow rate for this unit shall not exceed 1,300 Mcf/day. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Except during startup, shutdown, and refractory curing, maximum PM10 emissions shall not exceed the lb/hr limit calculated as follows: $PM10 = \{(7.0 \text{ lb/day}) + (249.2 \text{ lb/day}) \times (\text{fraction of total TEOR gas incinerated in this unit during testing})\} / (24 \text{ hr/day})$. [District Rules 2201, 2520, 4201, and 4301] Federally Enforceable Through Title V Permit
14. Emission rates, except during startup, shutdown, and refractory curing shall not exceed any of the following: VOC: 0.003 lb/MMBtu, NOx (as NO2): 0.011 lb/MMBtu or 9 ppmv @ 3% O2, or CO: 0.030 lb/MMBtu or 40 ppmv @ 3% O2. [District NSR Rule, 2520, 4301, 4305, 4306, 4405 and Kern County Rule 425] Federally Enforceable Through Title V Permit
15. Sulfur content of all fuel gas sources combined shall not exceed 5 gr-S/100 dscf. [District Rule 4320 and Kern County Rule 424] Federally Enforceable Through Title V Permit
16. Emission rates during startup, shutdown and refractory curing shall not exceed: particulate matter - 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO2; sulfur - 200 pounds of SO2 per hour, or 2000 ppmv as SO2, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO2 - 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4101, 4102, 4301, 4405, 4406, 4801 and Kern County Rules 424 and 425] Federally Enforceable Through Title V Permit
17. Emission rates shall not exceed any of the following: PM10: 240.0 lb/day, VOC: 4.4 lb/day, NOx (as NO2): 46.8 lb/day or 5889 lb/year, or CO: 44.0 lb/day [District NSR Rule, 4301, 5.2.1 and 5.2.3] Federally Enforceable Through Title V Permit
18. Duration of startup and shutdown (as defined in Rule 4320) shall not exceed 2 hours each per occurrence. Refractory curing period is defined as a maintenance-based reduced-load period of time during which a unit is brought from a shutdown status to staged rates of firing for the sole purpose of curing new refractory lining of the unit, and shall not exceed 30 hours per occurrence. The operator shall maintain records of the duration of start-up, shutdown, and refractory curing periods. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
19. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
20. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100 (amended December 17, 1992), the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 5.4.2; 4306, 5.4.2; and 4320, 5.7.1] Federally Enforceable Through Title V Permit

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

21. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
22. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
23. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise 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. For the purposes of permittee-performed alternate monitoring, emissions measurements may be performed at any time after the unit reaches conditions representative of normal operation. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
24. Compliance with fuel sulfur limit(s) can be demonstrated either by monitoring sulfur content at location(s) after all fuel sources are combined prior to incineration, or by monitoring the sulfur content and volume of each fuel source and performing mass balance calculations. Records of monitoring locations, detected sulfur concentrations, and mass balance calculations, if necessary, shall be maintained and kept onsite and made readily available for District inspection upon request. [District Rule 4320] Federally Enforceable Through Title V Permit
25. Source testing to measure natural gas-combustion NO_x and CO emissions from this unit shall be conducted at least once every twelve (12) months (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months (no more than 30 days before or after the required 36-month source test date). If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
26. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
27. 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. 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
28. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SO_x (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - EPA Method 11 or 15, ASTM D3246 or double GC for H₂S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 1081, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
29. 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 and 4306] Federally Enforceable Through Title V Permit
30. All records shall be maintained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit
31. Permittee shall maintain accurate records of heating values (in Btu/scf) and daily consumption of natural gas/TEOR waste gas, and such records shall be made readily available for District inspection upon request for a period of five years. [District NSR Rule, District Rule 1070] 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.

32. NOTE: There are no sulfur compounds daily emission limits (DELs) expressed on this permit for incineration of TEOR gas, sulfur compounds emissions are limited by DELs on permit S-1547-359.
33. Formerly S-1511-181

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

DRAFT

ATTACHMENT B

Authority to Construct #
S-1547-761-17 and '-803-11



AUTHORITY TO CONSTRUCT

PERMIT NO: S-1547-761-17

ISSUANCE DATE: 05/28/2009

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: NE03 TOWNSHIP: 29S RANGE: 21E

EQUIPMENT DESCRIPTION:

MODIFICATION OF: 62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR, WITH A COEN ULN BURNER, FLUE GAS RECIRCULATION, AND NON-CONDENSIBLE PIPING FROM VAPOR CONTROL SYSTEM S-1547-359. (#3-2M) (BELRIDGE): REPLACE EXISTING BURNER WITH COEN MODEL QLN-ULN ULTRA LOW NOX BURNER, OR NORTH AMERICAN MODEL MAGNA FLAME LEX ULTRA LOW NOX BURNER, OR ACT GIDEON ULTRA LOW NOX BURNER, OR EQUIVALENT; OR TUNE EXISTING BURNER; AND LOWER NOX LIMIT TO 9 PPM @ 3% O2 FOR RULE 4320 COMPLIANCE (RENEWED TWO TIMES - 5/20/13 JAG)

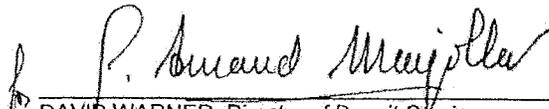
CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2520] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. The permittee shall notify the District of the compliance method chosen (replacement burner or tuning) and if applicable, the approved burner to be installed prior to implementation of this ATC. [District Rule 2201]
4. The permittee shall obtain written District approval for the use of any equivalent equipment not specifically approved by this ATC. Approval of the equivalent equipment shall be made in writing and only after the District's determination that the submitted design and performance of the proposed alternate equipment is equivalent to the authorized equipment [District Rule 2010]

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-1547-761-17 May 21 2013 2:26PM - GARCIA Joint Inspection NOT Required



AUTHORITY TO CONSTRUCT

PERMIT NO: S-1547-803-11

ISSUANCE DATE: 05/28/2009

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: NE03 TOWNSHIP: 29S RANGE: 21E

EQUIPMENT DESCRIPTION:

MODIFICATION OF: 62.5 MMBTU/HR GAS-FIRED STEAM GENERATOR, WITH A COEN QLN-ULN LO-NOX BURNER ASSEMBLY, FLUE GAS RECIRCULATION, OXYGEN MONITOR/CONTROLLER, AND NON-CONDENSIBLE PIPING FROM VAPOR CONTROL SYSTEM S-1547-359 (BELRIDGE #3-20): REPLACE EXISTING BURNER WITH COEN MODEL QLN-ULN ULTRA LOW NOX BURNER, OR NORTH AMERICAN MODEL MAGNA FLAME LEX ULTRA LOW NOX BURNER, OR ACT GIDEON ULTRA LOW NOX BURNER, OR EQUIVALENT; OR TUNE EXISTING BURNER; AND LOWER NOX LIMIT TO 9 PPM @ 3% O2 FOR RULE 4320 COMPLIANCE (RENEWED TWO TIMES - 5/20/13 JAG)

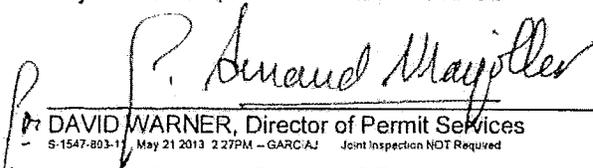
CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2520] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. The permittee shall notify the District of the compliance method chosen (replacement burner or tuning) and if applicable, the approved burner to be installed prior to implementation of this ATC. [District Rule 2201]
4. The permittee shall obtain written District approval for the use of any equivalent equipment not specifically approved by this ATC. Approval of the equivalent equipment shall be made in writing and only after the District's determination that the submitted design and performance of the proposed alternate equipment is equivalent to the authorized equipment [District Rule 2010]

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-1547-803-11, May 21 2013 2:27PM - GARC/AJ Joint Inspection NOT Required

ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
S-1737-761-25	0	0	0	0	0
S-1737-803-19	0	0	0	0	0
Total	0	0	0	0	0

ATTACHMENT D

Application

S-1547-761-25 RECEIVED

L-803-19

JUL 15 2013

SJVAPCD Southern Region

San Joaquin Valley Air Pollution Control District

APPLICATION FOR TITLE V MODIFICATION:

~~MAJOR MODIFICATION~~
ADMINISTRATIVE AMENDMENT
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 _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS:	
5. EQUIPMENT FOR WHICH APPLICATION IS MADE (Include Permit Nos.): Convert the following ATC(s) to PTO with operating conditions incorporated into the Title V permit: S-1547-761-17, S-1547-803-11 <small>(Use additional sheets if necessary)</small>	
6. DO YOU REQUEST A CERTIFICATE OF CONFORMITY WITH THIS ACTION? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
7. IS THIS APPLICATION SUBMITTED AS A RESULT OF A NOV/NTC? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO NOV/NTC No.: _____	
8. SIGNATURE OF APPLICANT/CONTACT PERSON: <i>Brent Winn</i>	TYPE OR PRINT TITLE OF APPLICANT: Environmental Engineer
9. TYPE OR PRINT NAME OF APPLICANT/CONTACT: Brent Winn	DATE: 7/15/13
10. FAX NUMBER: (661) 665-7437	TELEPHONE NUMBER: (661) 665-4363

FOR APCD USE ONLY: **NO \$**

DATE STAMP	FILING FEE RECEIVED: \$ _____ /
	DATE PAID: _____
	PROJECT NO.: S-1132957 FACILITY REGION & ID: S-1547

San Joaquin Valley Unified Air Pollution Control District

TITLE V COMPLIANCE CERTIFICATION FORM

9 ppm NOx Tune-up for Rule 4320	
Permit No.	Steam Gen No.
S-1547- 761-17	Belridge 3-2M
S-1547- 803-11	Belridge 3-20
S-1547-	

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE AMENDMENT
 MINOR PERMIT MODIFICATION

COMPANY NAME: Aera Energy LLC	FACILITY ID: S-1547
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: Aera Energy LLC	
3. Agent to the Owner: N/A	

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

- Based on information and belief formed after reasonable inquiry, the emission units identified in this application will continue to comply with the applicable federal requirement(s) which the emission units are in compliance.
- Based on information and belief formed after reasonable inquiry, the emission units identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

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



 Signature of Responsible Official

7-15-13

 Date

E.J Gonzalez

 Name of Responsible Official (please print)

Process Supervisor

 Title of Responsible Official (please print)

ATTACHMENT E

Previous Title V Operating Permit
S-1547-761-24 and '-803-18

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-761-24

EXPIRATION DATE: 05/31/2016

SECTION: NE03 **TOWNSHIP:** 29S **RANGE:** 21E

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR, WITH A COEN ULN BURNER, FLUE GAS RECIRCULATION, AND NON-CONDENSIBLE PIPING FROM VAPOR CONTROL SYSTEM S-1547-359. (#3-2M) (BELRIDGE)

PERMIT UNIT REQUIREMENTS

1. Copies of all fuel invoices showing quantity and delivery points of gas delivered and copies of quality terms of gas delivery contracts 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, 9.3.2] Federally Enforceable Through Title V Permit
2. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit
3. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 2520, 9.4.2 and 4320] Federally Enforceable Through Title V Permit
4. If the unit is fired on noncertified gaseous fuel and compliance with SO_x emission limits is achieved through fuel sulfur content limitations, the following test methods (or other approved methods listed in this permit) shall be used; H₂S: ASTM D6228 or grab sample analysis by double GC for H₂S and mercaptans performed in the laboratory; total sulfur: ASTM 1072, D3246, D4084 or D6228; and methane content: ASTM D1945. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
5. The operator shall demonstrate compliance with this unit's sulfur compound exhaust concentration limit(s) using one of the following: test the sulfur content of each fuel source, 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 Rules 2520, 9.4.2, 4301, 5.2.1 and Rule 4801, 3.1] Federally Enforceable Through Title V Permit
6. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of 40 CFR 60, Subpart Dc (except 60.44c(g) and (h) and 60.48c). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
7. Only natural gas or a combination of natural gas and scrubbed non-condensable gas from sulfur scrubbing system(s) S-1547-359 shall be used as fuel in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Steam generator shall be operated at no greater than 1,466.7 MMBtu hhv/day heat input. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Maximum TEOR gas flow rate for this unit shall not exceed 1,300 Mcf/day. [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. The total fuel burned in this unit shall be less than 50% by volume PUC quality natural gas determined on a calendar month basis. PUC quality natural gas is any gaseous fuel where the sulfur content is no more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet, no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet, and at least 80% methane by volume. [District Rule 4320] Federally Enforceable Through Title V Permit
11. Fuel H₂S, total sulfur, and methane content shall be determined semi-annually using the following test methods H₂S: ASTM D6228; total sulfur: ASTM D1072; ASTM D3246, or ASTM D6228; and methane content: ASTM D1945. [District Rule 4320] Federally Enforceable Through Title V Permit
12. The PUC quality/produced natural gas line and CVR/waste gas line shall each be equipped with a volumetric fuel meter. Permittee shall maintain monthly records of the percentage by volume of PUC quality natural gas burned in the unit. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
13. Sulfur content of all fuel gas sources combined shall not exceed 5 gr-S/100 dscf. [District Rule 4320 and Kern County Rule 424] Federally Enforceable Through Title V Permit
14. When fired exclusively on natural gas emissions from this unit shall not exceed either of the following limits: PM₁₀: 0.005 lb/MMBtu or SO_x (as SO₂): 0.002 lb/MMBtu. [District Rules 2201, 2520, 4201, 4301, 4320, 4406, 4801, and Kern County Rule 424] Federally Enforceable Through Title V Permit
15. When natural gas and TEOR gas fired, except during startup, shutdown, and refractory curing, maximum PM₁₀ emissions shall not exceed the lb/hr limit calculated as follows: $PM_{10} = \{(7.0 \text{ lb/day}) + (249.2 \text{ lb/day}) \times (\text{fraction of total TEOR gas incinerated in this unit during testing})\} / (24 \text{ hr/day})$. [District Rules 2201, 2520, 4201 and 4301] Federally Enforceable Through Title V Permit
16. Emission rates, except during startup, shutdown, and refractory curing shall not exceed any of the following: VOC: 0.003 lb/MMBtu, NO_x (as NO₂): 0.014 lb/MMBtu or 12 ppmv @ 3% O₂, or CO: 0.030 lb/MMBtu or 40 ppmv @ 3% O₂. [District Rules 2201, 2520, 4301, 4305, 4306, 4320, 4405, and Kern County Rule 425] Federally Enforceable Through Title V Permit
17. Emission rates during startup, shutdown and refractory curing shall not exceed: particulate matter - 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO₂; sulfur - 200 pounds of SO₂ per hour, or 2000 ppmv as SO₂, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO₂ - 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4101, 4102, 4301, 4405, 4406, 4801 and Kern County Rules 424 and 425] Federally Enforceable Through Title V Permit
18. Emission rates shall not exceed any of the following: PM₁₀: 240.0 lb/day, VOC: 4.4 lb/day, NO_x (as NO₂): 52.8 lb/day or 7,495 lb/year, or CO: 44.0 lb/day [District Rules 2201 and 4301, 5.2.1 and 5.2.3] Federally Enforceable Through Title V Permit
19. Duration of startup and shutdown (as defined in Rule 4320) shall not exceed 2 hours each per occurrence. Refractory curing period is defined as a maintenance-based reduced-load period of time during which a unit is brought from a shutdown status to staged rates of firing for the sole purpose of curing new refractory lining of the unit, and shall not exceed 30 hours per occurrence. The operator shall maintain records of the duration of start-up, shutdown, and refractory curing periods. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 5.4.2; 4306, 5.4.2; and 4320, 5.7.1] Federally Enforceable Through Title V Permit

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

21. If either the NO_x or CO concentrations corrected to 3% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100 (amended December 17, 1992), the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 5.4.2; 4306, 5.4.2; and 4320, 5.7.1] Federally Enforceable Through Title V Permit
22. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
23. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 5.4.2; 4306, 5.4.2; and 4320, 5.7.1] Federally Enforceable Through Title V Permit
24. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise 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. For the purposes of permittee-performed alternate monitoring, emissions measurements may be performed at any time after the unit reaches conditions representative of normal operation. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
25. Compliance with fuel sulfur limit(s) can be demonstrated either by monitoring sulfur content at location(s) after all fuel sources are combined prior to incineration, or by monitoring the sulfur content and volume of each fuel source and performing mass balance calculations. Records of monitoring locations, detected sulfur concentrations, and mass balance calculations, if necessary, shall be maintained and kept onsite and made readily available for District inspection upon request. [District Rule 4320] Federally Enforceable Through Title V Permit
26. Source testing to measure natural gas-combustion NO_x and CO emissions from this unit shall be conducted at least once every twelve (12) months (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months (no more than 30 days before or after the required 36-month source test date). If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. 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
28. 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. 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
These terms and conditions are part of the Facility-wide Permit to Operate.

29. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SO_x (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - EPA Method 11 or 15, ASTM D3246 or double GC for H₂S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 1081, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
30. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
31. All records shall be maintained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
32. Permittee shall maintain accurate records of heating values (in Btu/scf) and daily consumption of natural gas/TEOR waste gas, and such records shall be made readily available for District inspection upon request for a period of five years. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
33. NOTE: There are no sulfur compounds daily emission limits (DELS) expressed on this permit for incineration of TEOR gas, sulfur compounds emissions are limited by DELs on permit S-1547-359.
34. NOTE: Formerly S-1511-118

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-803-18

EXPIRATION DATE: 05/31/2016

SECTION: NE03 **TOWNSHIP:** 29S **RANGE:** 21E

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR GAS-FIRED STEAM GENERATOR, WITH A COEN QLN-ULN LOW-NOX BURNER ASSEMBLY, FLUE GAS RECIRCULATION, OXYGEN MONITOR/CONTROLLER, AND NON-CONDENSIBLE PIPING FROM VAPOR CONTROL SYSTEM S-1547-359 (BELRIDGE #3-20)

PERMIT UNIT REQUIREMENTS

1. Copies of all fuel invoices showing quantity and delivery points of gas delivered and copies of quality terms of gas delivery contracts 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, 9.3.2] Federally Enforceable Through Title V Permit
2. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
3. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 2520, 9.4.2 and 4320] Federally Enforceable Through Title V Permit
4. If fuel analysis is used to demonstrate compliance with conditions of this permit, the fuel higher heating value for each fuel shall be certified by a third party fuel supplier or determined by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.4.2; 4305, 6.2.1; 4306, 6.2.1; 4320, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit
5. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of 40 CFR 60, Subpart Dc (except 60.44c(g) and (h) and 60.48c). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
6. Only natural gas or a combination of natural gas and scrubbed non-condensable gas from sulfur scrubbing system(s) S-1547-359 shall be used as fuel in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Steam generator shall be operated at no greater than 1,466.7 MMBtu hhv/day heat input. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Maximum TEOR gas flow rate for this unit shall not exceed 1,300 Mcf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The total fuel burned in this unit shall be less than 50% by volume PUC quality natural gas determined on a calendar month basis. PUC quality natural gas is any gaseous fuel where the sulfur content is no more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet, no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet, and at least 80% methane by volume. [District Rule 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
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10. Fuel H₂S, total sulfur, and methane content shall be determined semi-annually. [District Rule 4320] Federally Enforceable Through Title V Permit
11. If the unit is fired on noncertified gaseous fuel and compliance with SO_x emission limits is achieved through fuel sulfur content limitations, the following test methods (or other approved methods listed in this permit) shall be used; H₂S: ASTM D6228 or grab sample analysis by double GC for H₂S and mercaptans performed in the laboratory; total sulfur: ASTM 1072, D3246, D4084 or D6228; and methane content: ASTM D1945. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
12. The PUC quality/produced natural gas line and CVR/waste gas line shall each be equipped with a volumetric fuel meter. Permittee shall maintain monthly records of the percentage by volume of PUC quality natural gas burned in the unit. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
13. Sulfur content of all fuel gas sources combined shall not exceed 5 gr-S/100 dscf. [District Rule 4320 and Kern County Rule 424] Federally Enforceable Through Title V Permit
14. Except during startup, shutdown, and refractory curing, maximum PM₁₀ emissions shall not exceed the lb/hr limit calculated as follows: $PM_{10} = \{(7.0 \text{ lb/day}) + (249.2 \text{ lb/day}) \times (\text{fraction of total TEOR gas incinerated in this unit during testing})\} / (24 \text{ hr/day})$. [District Rules 2201, 2520, 4201, and 4301] Federally Enforceable Through Title V Permit
15. Emission rates, except during startup, shutdown, and refractory curing shall not exceed any of the following: VOC: 0.003 lb/MMBtu, NO_x (as NO₂): 0.014 lb/MMBtu or 12 ppmv @ 3% O₂, or CO: 0.030 lb/MMBtu or 40 ppmv @ 3% O₂. [District Rules 2201, 2520, 4301, 4305, 4306, 4320, 4405 and Kern County Rule 425] Federally Enforceable Through Title V Permit
16. Emission rates during startup, shutdown and refractory curing shall not exceed: particulate matter - 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO₂; sulfur - 200 pounds of SO₂ per hour, or 2000 ppmv as SO₂, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO₂ - 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4101, 4102, 4301, 4405, 4406, 4801 and Kern County Rules 424 and 425] Federally Enforceable Through Title V Permit
17. Emission rates shall not exceed any of the following: PM₁₀: 240.0 lb/day, VOC: 4.4 lb/day, NO_x (as NO₂): 46.8 lb/day or 7495 lb/year, or CO: 44.0 lb/day [District Rules 2201, 4301, 5.2.1 and 5.2.3] Federally Enforceable Through Title V Permit
18. Duration of startup and shutdown (as defined in Rule 4320) shall not exceed 2 hours each per occurrence. Refractory curing period is defined as a maintenance-based reduced-load period of time during which a unit is brought from a shutdown status to staged rates of firing for the sole purpose of curing new refractory lining of the unit, and shall not exceed 30 hours per occurrence. The operator shall maintain records of the duration of start-up, shutdown, and refractory curing periods. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 5.4.2; 4306, 5.4.2; and 4320, 5.7.1] Federally Enforceable Through Title V Permit
20. If either the NO_x or CO concentrations corrected to 3% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100 (amended December 17, 1992), the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 5.4.2; 4306, 5.4.2; and 4320, 5.7.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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21. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
22. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 5.4.2; 4306, 5.4.2; and 4320, 5.7.1] Federally Enforceable Through Title V Permit
23. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise 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. For the purposes of permittee-performed alternate monitoring, emissions measurements may be performed at any time after the unit reaches conditions representative of normal operation. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
24. Compliance with fuel sulfur limit(s) can be demonstrated either by monitoring sulfur content at location(s) after all fuel sources are combined prior to incineration, or by monitoring the sulfur content and volume of each fuel source and performing mass balance calculations. Records of monitoring locations, detected sulfur concentrations, and mass balance calculations, if necessary, shall be maintained and kept onsite and made readily available for District inspection upon request. [District Rule 4320] Federally Enforceable Through Title V Permit
25. Source testing to measure natural gas-combustion NO_x and CO emissions from this unit shall be conducted at least once every twelve (12) months (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months (no more than 30 days before or after the required 36-month source test date). If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
26. 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
27. 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. 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
28. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or 10B or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SO_x (lb/MMBtu) - ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - EPA Method 11 or 15, ASTM D3246 or double GC for H₂S and mercaptans performed in a laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 1081, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
29. 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
30. All records shall be maintained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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31. Permittee shall maintain accurate records of heating values (in Btu/scf) and daily consumption of natural gas/TEOR waste gas, and such records shall be made readily available for District inspection upon request for a period of five years. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
32. NOTE: There are no sulfur compounds daily emission limits (DELs) expressed on this permit for incineration of TEOR gas, sulfur compounds emissions are limited by DELs on permit S-1547-359.
33. Formerly S-1511-181

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