



APR 26 2010

Mr. Robert Beebout
Aera Energy, LLC
P.O. Box 11164
Bakersfield, CA 93389-1164

**Re: Notice of Preliminary Decision - ATC / Certificate of Conformity
Facility # S-1547
Project # S-1095309**

Dear Mr. Beebout:

Enclosed for your review and comment is the District's analysis of an application for Authorities to Construct for Aera Energy, LLC in the Midway Sunset Oilfield, CA. Aera proposes to lower NOx emissions and limit fuel gas sulfur content to comply with Rule 4320. Additionally, Aera proposes to upgrade the SulFerox treatment plant to meet the lower sulfur fuel requirements.

After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the Authorities to Construct will be issued to the facility with Certificates of Conformity. Prior to operating with modifications authorized by the Authorities to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

The public notice will be published approximately three days from the date of this letter. Please submit your written comments within the 30-day public comment period which begins on the date of publication of the public notice.

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

DW: KR/cm

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

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

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



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



HEALTHY AIR LIVING™

APR 26 2010

Gerardo C. Rios, Chief
Permits Office
Air Division
U.S. EPA - Region IX
75 Hawthorne St.
San Francisco, CA 94105

**Re: Notice of Preliminary Decision - ATC / Certificate of Conformity
Facility # S-1547
Project # S-1095309**

Dear Mr. Rios:

Enclosed for your review is the District's engineering evaluation of an application for Authorities to Construct for Aera Energy, LLC in the Midway Sunset Oilfield, CA, which has been issued a Title V permit. Aera Energy, LLC is requesting that Certificates of Conformity, with the procedural requirements of 40 CFR Part 70, be issued with this project. Aera proposes to lower NOx emissions and limit fuel gas sulfur content to comply with Rule 4320. Additionally, Aera proposes to upgrade the SulFerox treatment plant to meet the lower sulfur fuel requirements.

Enclosed is the engineering evaluation of this application, along with the current Title V permit, and proposed Authorities to Construct # S-1547-766-16, '-766-17, '-766-18, '-767-16, '-767-17, '-767-18, '-768-17, '-768-18, '-768-19, '-769-17, '-769-18, '-769-19, '-770-17, '-770-18, '-770-19, '-771-16, '-771-17, '-771-18, '-771-19, '-772-16, '-772-17, '-772-18, '-772-19, '-777-17, '-777-18, '-777-19, '-778-17, '-778-18, '-778-19, '-779-16, '-779-17, '-779-18, '-779-19, '-780-16, '-780-17, '-780-18, '-780-19, '-781-16, '-781-17, '-781-18, '-781-19, '-797-17, '-797-18, '-797-19, '-819-9 with Certificates of Conformity. After demonstrating compliance with the Authority to Construct, the conditions will be incorporated into the facility's Title V permit through an administrative amendment.

Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter. 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

DW: KR/cm

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APR 26 2010

Mike Tollstrup, Chief
Project Assessment Branch
Air Resources Board
P O Box 2815
Sacramento, CA 95812-2815

Re: **Notice of Preliminary Decision - ATC / Certificate of Conformity**
Facility # S-1547
Project # S-1095309

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of an application for Authorities to Construct for Aera Energy, LLC in the Midway Sunset Oilfield, CA. Aera proposes to lower NOx emissions and limit fuel gas sulfur content to comply with Rule 4320. Additionally, Aera proposes to upgrade the SulFerox treatment plant to meet the lower sulfur fuel requirements.

The public notice will be published approximately three days from the date of this letter. Please submit your written comments within the 30-day public comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. 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

DW: KR/cm

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**NOTICE OF PRELIMINARY DECISION
FOR THE PROPOSED ISSUANCE OF
AUTHORITY TO CONSTRUCT**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District solicits public comment on the proposed issuance of Authority To Construct to Aera Energy, LLC for its crude oil and natural gas production operation in the Midway Sunset Oilfield, California. Aera proposes to lower NOx emissions and limit fuel gas sulfur content to comply with Rule 4320. Additionally, Aera proposes to upgrade the SulFerox treatment plant to meet the lower sulfur fuel requirements.

The analysis of the regulatory basis for these proposed actions, Project #S-1095309, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and the District office at the address below. Written comments on the proposed initial permit must be submitted within 30 days of the publication date of this notice to **DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 34946 FLYOVER COURT, BAKERSFIELD, CA 93308.**

San Joaquin Valley Air Pollution Control District Authority to Construct

Modify Gas-Fired Steam Generators for Rule 4320 Compliance

Facility Name: Aera Energy, LLC. Date: March 13, 2010
Mailing Address: P.O. Box 11164 Engineer: Kris Rickards
Bakersfield, CA 93389-1164 Lead Engineer: Rich Karrs *RWK*
Contact Person: Robert M. Beebout Steve Tomlin *4-5-10*
Email rmbeebout@aeraenergy.com Steve.Tomlin@erm.com
Telephone: 661-665-3212 770-590-8383
Fax: -- 770-590-9164
Application #(s): S-1547-766-16, '-766-17, '-766-18, '-767-16, '-767-17, '-767-18, '-768-17,
'-768-18, '-768-19, '-769-17, '-769-18, '-769-19, '-770-17, '-770-18,
'-770-19, '-771-16, '-771-17, '-771-18, '-771-19, '-772-16, '-772-17,
'-772-18, '-772-19, '-777-17, '-777-18, '-777-19, '-778-17, '-778-18,
'-778-19, '-779-16, '-779-17, '-779-18, '-779-19, '-780-16, '-780-17,
'-780-18, '-780-19, '-781-16, '-781-17, '-781-18, '-781-19, '-797-17,
'-797-18, '-797-19, '-819-9
Project #: S-1095309
Deemed Complete: December 14, 2009

I. PROPOSAL

Aera Energy, LLC (hereafter referred to as Aera) has submitted Authority to Construct (ATC) applications for equipment upgrades to the SulFerox plant and standby sulfur scrubbing system at the MOCO Lease and for the addition of permit conditions to thirteen steam generator permits, for compliance with the SO_x limitations and requirements of Rule 4320, Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBTU/hr.

Rule 4320 requires that the sulfur content in fuel gas for steam generators be reduced to a level lower than that currently being achieved by the MOCO Lease SulFerox plant. The proposed SulFerox equipment upgrades consist of a combination of a second sparger vessel and/or additional gas compressor(s), installed either upstream or downstream of the plant, or both. Also, Aera is proposing upgrades to the standby sulfur scrubbing system (which operates when the SulFerox system is not operating) consisting of replacing the existing contacting vessel with either one or two larger contacting vessel(s). These upgrades are expected to increase the sulfur removal efficiency of the plant and allow the steam generators that are authorized to incinerate this gas (S-1547-766 through -772 & -777 through -781, and -797) to meet the sulfur limits in Rule 4320.

In order to comply with Rule 4320 requirements, Aera proposes the following scenarios for the steam generators (NO_x compliant options previously approved in projects S-1084298,

'4300, '4306, '4302, and '4304) including 12 ppmv-NO_x compliant options not previously issued:

- Reduce NO_x limit to 7 ppmv (regular schedule) for units firing on >50% PUC gas (Table 1.C.2 option a) and limit fuel sulfur content to 5 gr-S/100 dscf (Section 5.4.1.2)
- Reduce NO_x limit to 9 ppmv (staged schedule) for units firing on >50% PUC gas (Table 1.C.2 option b) and limit fuel sulfur content to 5 gr-S/100 dscf (Section 5.4.1.2)
- Reduce NO_x limit to 12 ppmv (staged schedule) for units firing on <50% PUC gas (Table 1.C.3) and limit fuel sulfur content to 5 gr-S/100 dscf (Section 5.4.1.2)
- Pay annual emission fees to comply with NO_x requirement (Section 5.1.2) and limit fuel sulfur content to 5 gr-S/100 dscf (Section 5.4.1.2)

Previously issued NO_x compliant ATCs for these units will be cancelled and replaced by the ATCs issued within this project.

At the suggestion of the District, Aera has agreed to delete the sulfur compound specific limiting condition (SLC) that limits the combined sulfur emissions from incinerating well vapors in the 13 steam generators approved for this service. The sulfur compound SLC currently limits sulfur compound emissions to 258 lb/day and is set forth as an enforceable condition on the TEOR operation/well vent permit, unit '-819. To replace the SLC, a limit of 5 grains/100 scf will be established for each steam generator. Also, the existing PM₁₀ SLC on permit '-819 that limits PM emissions from the incineration of well vent vapor will be retained but consolidated with the PM₁₀ emissions from combusting natural gas and moved to the individual steam generator permits.

In addition, Aera is requesting permit S-1547-819 be corrected to specifically list steam generator S-1547-797 (MOCO #603) as an authorized incineration device for produced gas. The permit for this steam generator already contains permit conditions specifically authorizing the generator as an approved incineration device for the produced gas from permit S-1547-819. This correction will provide clarity and consistency with respect to the list of authorized incineration devices for permit S-1547-819.

Permit unit S-1547-778 is currently equipped with a Gideon burner as part of an experimental research exemption. Therefore, language that does not conflict with this burner is requested (standard language on previously issued and currently proposed ATCs will accommodate this change).

These units are currently authorized to incinerate TEOR well vent vapor from the TEOR operation listed on permit S-1547-819. This TEOR operation lists conditions limiting fuel gas sulfur and daily PM₁₀ emissions for the combustion of vapors in the steam generators evaluated in this project. To simplify compliance with these emission limits, all conditions related to the combustion of TEOR vapor will be removed from the TEOR operation and corresponding emission limits will be added to the steam generator permits.

There will not be an increase in potential emissions of any pollutant as a result of this project. Modification of the NO_x emission limits, limiting the sulfur, and replacing or modifying the components associated with the SulFerox plant are proposed solely to comply with District Rule 4320 requirements. Since there is a change to the method of operation of the steam generators these changes are modifications pursuant to District Rule 2201, *New and Modified Stationary Source Review Rule*.

Aera received their Title V Permit for facility S-1547 on November 26, 2002. This modification can be classified as a Title V minor modification pursuant to Rule 2520, Section 3.20, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. Aera must apply to administratively amend their Title V Operating Permit to include the requirements of the ATCs issued with this project.

II. APPLICABLE RULES

- Rule 2201 New and Modified Stationary Source Review Rule (9/21/06)
- Rule 2520 Federally Mandated Operating Permits (6/21/01)
- Rule 4001 New Source Performance Standards (4/14/99)
- Rule 4101 Visible Emissions (2/17/05)
- Rule 4102 Nuisance (12/17/92)
- Rule 4201 Particulate Matter Concentration (12/17/92)
- Rule 4301 Fuel Burning Equipment (12/17/92)
- Rule 4304 Equipment Tuning Procedure for Boilers, Steam Generators and Process Heaters (10/19/95)
- Rule 4305 Boilers, Steam Generators and Process Heaters – Phase II (8/21/03)
- Rule 4306 Boilers, Steam Generators and Process Heaters – Phase III (10/16/08)
- Rule 4320 Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr (10/16/08)
- Rule 4401 Steam Enhanced Crude Oil Production Wells (12/14/06)
- Rule 4405 Oxides Of Nitrogen Emissions From Existing Steam Generators Used In Thermally Enhanced Oil Recovery -Central And Western Kern County Fields (12/17/92)
- Rule 4406 Sulfur Compounds From Oil-Field Steam Generators – Kern County (12/17/92)
- Rule 4801 Sulfur Compounds (12/17/92)
- CH&SC 41700 Health Risk Assessment
- CH&SC 42301.6 School Notice
- Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)
- California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

III. PROJECT LOCATION

Aera's MOCO Lease is located in the South Midway Sunset Oilfield near Maricopa, CA, within Aera's Heavy Oil Western Stationary Source. The equipment will not be located within 1,000 feet of the outer boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

IV. PROCESS DESCRIPTION

Aera Energy LLC operates permitted equipment in the Midway Sunset Oilfields for the production of crude oil and natural gas. In thermally enhanced oil recovery (TEOR), natural gas is combusted in steam generators to produce steam for injection into heavy crude oil bearing strata via injection wells to reduce the viscosity of the crude oil, thereby facilitating thermally enhanced oil production. Gas produced along with crude oil is captured and processed for use as fuel.

At the MOCO lease, Aera utilizes a SulFerox plant to remove H₂S and other sulfur compounds from produced gas prior to incineration in steam generators. The SulFerox process is a patented (Dow-Shell) reduction-oxidation process where H₂S is converted to elemental sulfur in a continuous process. S-1547-766 through -772 & -777 through -781, and -797 are authorized to incinerate produced gas treated by the SulFerox plant. The standby sulfur scrubbing system operates when the SulFerox plant is not operating, and utilizes a contacting vessel and scrubbing medium to absorb and chemically convert the H₂S in the gas to an inert byproduct.

V. EQUIPMENT LISTING

Pre-Project Equipment Description:

Permit Number	Equipment Description
S-1547-766-9	62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN LOW NOX BURNER WITH FLUE GAS RECIRCULATION (FGR) AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819. (MOCO #604) (SOUTH MIDWAY)
S-1547-767-9	62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR WITH COEN QLN-ULN BURNER AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819 (MOCO #605) (SOUTH MIDWAY)
S-1547-768-10	62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS-FIRED STEAM GENERATOR, WITH COEN QLN-ULN BURNER, FLUE GAS RECIRCULATION AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819. (MOCO #606) (SOUTH MIDWAY)
S-1547-769-10	62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS-FIRED STEAM GENERATOR, WITH COEN QLN-ULN BURNER, FLUE GAS RECIRCULATION AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819. (MOCO #607) (SOUTH MIDWAY)
S-1547-770-9	62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR, WITH COEN ULN BURNER, FLUE GAS RECIRCULATION AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819. (MOCO #608) (SOUTH MIDWAY)
S-1547-771-9	62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN LOW NOX BURNER WITH FLUE GAS RECIRCULATION (FGR) AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819. (MOCO #701) (SOUTH MIDWAY)
S-1547-772-9	62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN LOW NOX BURNER WITH FLUE GAS RECIRCULATION (FGR) AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819. (MOCO #702) (SOUTH MIDWAY)
S-1547-777-10	62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR, WITH A COEN QLN-ULN BURNER, FLUE GAS RECIRCULATION AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819. (MOCO #505) (SOUTH MIDWAY)
S-1547-778-10	62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN LOW NOX BURNER, FLUE GAS RECIRCULATION AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819, MOCO (#506) (SOUTH MIDWAY)

Permit Number	Equipment Description
S-1547-779-9	62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN LOW NOX BURNER WITH FLUE GAS RECIRCULATION (FGR) AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819. (MOCO #703) (SOUTH MIDWAY)
S-1547-780-10	62.5MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN LOW NOX BURNER WITH FLUE GAS RECIRCULATION (FGR) AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819, (MOCO #704) (SOUTH MIDWAY)
S-1547-781-10	62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN LOW NOX BURNER WITH FLUE GAS RECIRCULATION (FGR) AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819, (MOCO #705) (SOUTH MIDWAY)
S-1547-797-10	62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR WITH A COEN MODEL ULN BURNER AND WITH FLUE GAS RECIRCULATION (FGR) AND NON-CONDENSIBLE PIPING FROM VAPOR CONTROL SYSTEM S-1547-819 (MOCO 603) (SOUTH MIDWAY)
S-1547-819-8	TEOR OPERATION W/ UP TO 900 STEAM DRIVE WELLS SERVED BY WELL CASING VENT VAPOR COLLECTION AND CONTROL SYSTEM, WITH INCINERATION OF COLLECTED VAPOR IN STEAM GENERATORS S-1547-766 TO '-772, '-777 TO '-781 AND '-797

Proposed Modification:

Permit Number	Modification
S-1547-766-16, '-767-16, '-768-17, '-769-17, '-770-17, '-771-16, '-772-16, '-777-17, '-778-17, '-779-16, '-780-16, '-781-16, '-797-17	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; LOWER NOX LIMIT TO 7 PPMV @ 3% O2 AND LIMIT FUEL SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE
S-1547-766-17, '-767-17, '-768-18, '-769-18, '-770-18, '-771-17, '-772-17, '-777-18, '-778-18, '-779-17, '-780-17, '-781-17, '-797-18	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; LOWER NOX LIMIT TO 9 PPMV @ 3% O2 AND LIMIT FUEL SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE
S-1547-771-18, '-772-18, '-779-19, '-780-18, '-781-18	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; LOWER NOX LIMIT TO 12 PPMV @ 3% O2 AND LIMIT FUEL SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE
S-1547-766-18, '-767-18, '-768-19, '-769-19, '-770-19, '-771-19, '-772-19, '-777-19, '-778-19, '-779-19, '-780-19, '-781-19, '-797-19	LIMIT FUEL SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

Permit Number	Modification
S-1547-819	INSTALL SECOND SULFEROX SPARGER VESSEL AND/OR ADDITIONAL COMPRESSOR(S) UPSTREAM AND/OR DOWNSTREAM OF THE SULFEROX SYSTEM, REPLACE THE EXISTING STANDBY SULFUR SCRUBBING SYSTEM CONTACTING VESSEL WITH EITHER ONE OR TWO LARGER CONTACTING VESSEL(S) AND DELETE SULFUR COMPOUND SPECIFIC LIMITING CONDITION AND ESTABLISH INDIVIDUAL SULFUR LIMITS FOR STEAM GENERATORS APPROVED TO INCINERATE VAPOR, ALL FOR RULE 4320 COMPLIANCE

Post Project Equipment Description:

PTO S-1547-XXX-XX: [BASE DOCUMENT EQUIPMENT DESCRIPTION with exception of language changing to describe which burner option Aera chooses to install]

VI. EMISSION CONTROL TECHNOLOGY EVALUATION

Ultra Low NO_x burners:

Ultra Low-NO_x burners reduce NO_x formation by producing lower flame temperatures (and longer flames) than conventional burners. Conventional burners thoroughly mix all the fuel and air in a single stage just prior to combustion, whereas low-NO_x burners delay the mixing of fuel and air by introducing the fuel (or sometimes the air) in multiple stages. Generally, in the first combustion stage, the air-fuel mixture is fuel rich. In a fuel rich environment, all the oxygen will be consumed in reactions with the fuel, leaving no excess oxygen available to react with nitrogen to produce thermal NO_x. In the secondary and tertiary stages, the combustion zone is maintained in a fuel-lean environment. The excess air in these stages helps to reduce the flame temperature so that the reaction between the excess oxygen with nitrogen is minimized.

Flue Gas Re-circulation (FGR):

The use of flue gas re-circulation (FGR) can reduce nitrogen oxides (NO_x) emissions by 60% to 70%. In an FGR system, a portion of the flue gas is re-circulated back to the inlet air. As flue gas is composed mainly of nitrogen and the products of combustion, it is much lower in oxygen than the inlet air and contains virtually no combustible hydrocarbons to burn. Thus, flue gas is practically inert. The addition of an inert mass of gas to the combustion reaction serves to absorb heat without producing heat, thereby lowering the flame temperature. Since thermal NO_x is formed by high flame temperatures, the lower flame temperatures produced by FGR serve to reduce thermal NO_x.

Fuel Sulfur Scrubbing:

This project proposes a decrease in SO_x emissions resulting from increased removal efficiency of sulfur from the produced gas stream. Installation of either a second sparger vessel at the SulFerox plant, or a gas compressor upstream of the plant inlet, is expected to reduce the sulfur content of the produced gas to a level where the steam generators will meet Rule 4320 sulfur requirements. Similarly, replacing the existing standby sulfur scrubbing system contacting vessel with either one or two larger contacting vessel(s) will provide increased surface/contacting area for absorption/reaction and reduce the sulfur

content of the treated produced gas to a level where the steam generators will meet Rule 4320 sulfur requirements. Note: The additional valves, flanges, and connectors associated with sulfur removal equipment changes are minimal, and the additional components can be accommodated under the existing VOC fugitive emission limit for S-1547-819. Therefore, no change in the VOC emission limit for S-1547-819 is proposed.

Because this project is expected to decrease the sulfur content of the gas being combusted in the steam generators, actual PM₁₀ emissions may potentially decrease (due to the lower SO₄ fraction which contributes to PM₁₀ emissions); however, no change in the permitted PM₁₀ emission limits are proposed as the current limits are still reflective of the potential to emit of the steam generators.

Aera is proposing to comply with Rule 4320 Table 1, Category C.2 for NO_x (several configurations allowed by the rule) and limiting the fuel sulfur content per section 5.4.1.2 to 5 gr-S/100 dscf as explained in Section V.

The TEOR system, including the SulFerox plant, consists of fugitive VOC emissions only (from valves, flanges, etc.). Steam generators S-1547-766 through -772 & 777 through -781, and -797 are authorized to incinerate produced gas treated by the SulFerox plant.

VII. GENERAL CALCULATIONS

A. Assumptions

- The maximum operating schedule is 24 hours per day
- The units are fired on natural gas or a blend of natural and recovery gas
- Natural Gas Heating Value: 1,000 Btu/scf (APR-1720)
- F-Factor for Natural Gas: 8,578 dscf/MMBtu corrected to 60°F (40 CFR 60, Appendix B)
- No change in currently permitted, daily nor annual, potential to emit for CO, VOC, or PM10 is proposed or required
- Each of the steam generators in this project is also limited by permit condition to a maximum heat input rate of 1,440 MMBtu/day
- Pre-project daily emissions include start-up/shutdown
- Pre/Post Project NO_x emissions for applications complying with 7 and 9 ppmv-NO_x limits will be copied from projects S-1084298, '4300, '4306, '4302, and '4304 (NO_x compliance projects for Rule 4320)
- The daily potential to emit (PE) for NO_x will not decrease as the daily PE includes startup, shutdown and refractory curing emissions
- The TEOR system, including the SulFerox plant, consists of fugitive VOC emissions only (from valves, flanges, etc.)
- The additional valves, flanges, and connectors associated with modifying the SulFerox plant, or gas compressor(s) upstream and/or downstream of the plant, and the replacement of the existing standby sulfur scrubbing system contacting vessel are minimal, and the additional components can be accommodated under the existing VOC fugitive emission limit for S-1547-819. Therefore, no change in the VOC emission limit for S-1547-819 is proposed or required

B. Emission Factors

Pre-Project Emission Factors (EF1)

Permit Unit	Pre-Project Steady-State Emission Factor for NO _x (EF1)		Source
S-1547-771-18, '-772-18, '-779-19, '-780-18, '-781-18	0.018 lb-NO _x /MMBtu	15 ppmvd NO _x (@ 3%O ₂)	Current Permit

Post-Project Emission Factors (EF2)

The SO_x emission factor is calculated as follows for units fired on non-PUC quality gas and limiting the sulfur concentration in the fuel to 5 gr-S/100 dscf and is converted to lb-SO_x/MMBtu by the following equation:

$$\left(\frac{64 \text{ lb} \cdot \text{SO}_x}{32 \text{ lb} \cdot \text{S}} \right) \frac{5 \text{ gr} \cdot \text{S}}{100 \text{ dscf}} \left(\frac{1 \text{ lb}}{7,000 \text{ gr}} \right) \frac{\text{dscf}}{1,000 \text{ Btu}} \left(\frac{10^6 \text{ Btu}}{\text{MMBtu}} \right) = 0.0143 \frac{\text{lb} \cdot \text{SO}_x}{\text{MMBtu}}$$

Permit Unit	Post-Project Steady-State Emission Factors (EF2)		Source
S-1547-771-18, '-772-18, '-779-19, '-780-18, '-781-18	0.014 lb-NO _x /MMBtu	12 ppmvd NO _x (@ 3%O ₂)	Rule 4320, Table 1.C.3
All Units	0.002 lb-SO _x /MMBtu when firing on natural gas		Current Permit
All Units	0.0143 lb-SO _x /MMBtu when firing on TEOR gas	5 gr-S/100 dscf	Rule 4320, § 5.4.1.2

C. Calculations

1. Pre-Project Potential to Emit (PE1)

SO_x emissions are currently limited to 0.002 lb/MMBtu for all steam generators while firing on natural gas with a shared value of 258.0 lb-S/day listed on the TEOR operation (S-1547-819). This TEOR operation is permitted to transfer 4.09 MMscf/day or (at 1,000 btu/scf) 4,090 MMBtu/day through the following conditions:

- Total mass flow rate of sulfur compounds from sulfur scrubbing systems shall not exceed 258.0 lb/day as S. [District NSR Rule]
- Maximum gas flow rate from well casing vent vapor control system shall not exceed 4.09 MMscf/day. [District NSR Rule]

The SO_x emissions rate can be calculated as follows:

$$\left(\frac{258.0 \text{ lb} \cdot \text{S}}{\text{day}} \right) \frac{64 \text{ lb} \cdot \text{SO}_x}{32 \text{ lb} \cdot \text{S}} \left(\frac{\text{day}}{4,090 \text{ MMBtu}} \right) = 0.126 \frac{\text{lb} \cdot \text{SO}_x}{\text{MMBtu}} \text{ when fired on TEOR gas}$$

Daily Sulfur emissions for each unit, pre-project, will be calculated using the maximum allowable gas permitted by the TEOR operation divided amongst the 13 authorized devices (steam generators in this project). Each steam generator is incinerating $4,090/13 = 314.6$ MMBtu of TEOR gas per day and the remainder, to reach their permitted fuel limit of 1,440 MMBtu/day, is $1,440 - 314.6 = 1,125.4$ MMBtu/day.

So daily SO_x emissions can be calculated as follows:

$$\left(\frac{314.6 \text{ MMBtu}}{\text{day}} \right) \frac{0.126 \text{ lb} \cdot \text{SO}_x}{\text{MMBtu}} + \left(\frac{1,125.4 \text{ MMBtu}}{\text{day}} \right) \frac{0.002 \text{ lb} \cdot \text{SO}_x}{\text{MMBtu}} = 41.9 \frac{\text{lb} \cdot \text{SO}_x}{\text{day}}$$

This daily SO_x factor results in $41.9 \times 365 = 15,294$ lb-SO_x/year. Steam generator PE1 NO_x emissions were calculated in projects S-1084298, '4300, '4306, '4302, and '4304 (NO_x compliance projects for Rule 4320) and summarized in the following table:

Pre-Project Potential to Emit (PE1)								
Permit Unit	NOx Emissions		Permit Unit	NOx Emissions		Permit Unit	NOx Emissions	
	lb/day	lb/year		lb/day	lb/year		lb/day	lb/year
S-1547-766-9	49.0	9,461	S-1547-771-9	49.0	9,461	S-1547-779-9	49.0	9,461
S-1547-767-9	49.0	9,461	S-1547-772-9	49.0	9,461	S-1547-780-10	49.0	9,461
S-1547-768-10	49.0	9,461	S-1547-777-10	49.0	9,461	S-1547-781-10	49.0	9,461
S-1547-769-10	49.0	9,461	S-1547-778-10	49.0	9,461	S-1547-797-10	49.0	9,461
S-1547-770-9	49.0	9,461						

2. Post-Project Potential to Emit (PE2)

There is no change in daily or annual potential to emit for PM₁₀, CO, or VOC. NO_x PE2 for the steam generators complying with 7 and 9 ppmv-NO_x options was calculated in projects S-1084298, '4300, '4306, '4302, and '4304 (NO_x compliance projects for Rule 4320). Units complying with the 12 ppmv-NO_x option will have annual NO_x emissions calculated as follows:

$$\frac{0.014 \text{ lb} \cdot \text{NO}_x}{\text{MMBtu}} \left(\frac{1,440 \text{ MMBtu}}{\text{day}} \right) \frac{365 \text{ days}}{\text{year}} = 7,358 \frac{\text{lb} \cdot \text{NO}_x}{\text{year}}$$

These calculated and copied NO_x emissions for all requested options are summarized in the following table:

Post Project Potential to Emit (PE2)								
Units complying with 7 ppmv-NOx option								
Permit Unit	NOx Emissions		Permit Unit	NOx Emissions		Permit Unit	NOx Emissions	
	lb/day	lb/year		lb/day	lb/year		lb/day	lb/year
S-1547-766-16	49.0	4,205	S-1547-771-16	49.0	4,205	S-1547-779-16	49.0	4,205
S-1547-767-16	49.0	4,205	S-1547-772-16	49.0	4,205	S-1547-780-16	49.0	4,205
S-1547-768-17	49.0	4,205	S-1547-777-17	49.0	4,205	S-1547-781-16	49.0	4,205
S-1547-769-17	49.0	4,205	S-1547-778-17	49.0	4,205	S-1547-797-17	49.0	4,205
S-1547-770-17	49.0	4,205						
Units complying with 9 ppmv-NOx option								
Permit Unit	NOx Emissions		Permit Unit	NOx Emissions		Permit Unit	NOx Emissions	
	lb/day	lb/year		lb/day	lb/year		lb/day	lb/year
S-1547-766-17	49.0	5,782	S-1547-771-17	49.0	5,782	S-1547-779-17	49.0	5,782
S-1547-767-17	49.0	5,782	S-1547-772-17	49.0	5,782	S-1547-780-17	49.0	5,782
S-1547-768-18	49.0	5,782	S-1547-777-18	49.0	5,782	S-1547-781-17	49.0	5,782
S-1547-769-18	49.0	5,782	S-1547-778-18	49.0	5,782	S-1547-797-18	49.0	5,782
S-1547-770-18	49.0	5,782						
Units complying with 12 ppmv-NOx option								
Permit Unit	NOx Emissions		Permit Unit	NOx Emissions		Permit Unit	NOx Emissions	
	lb/day	lb/year		lb/day	lb/year		lb/day	lb/year
S-1547-771-18	49.0	7,358	S-1547-779-19	49.0	7,358	S-1547-781-18	49.0	7,358
S-1547-772-18	49.0	7,358	S-1547-780-18	49.0	7,358			
Units complying with SO_x only, PE_{1NOx} = PE_{2NOx}, option (15 ppmv-NOx)								
Permit Unit	NOx Emissions		Permit Unit	NOx Emissions		Permit Unit	NOx Emissions	
	lb/day	lb/year		lb/day	lb/year		lb/day	lb/year
S-1547-766-18	49.0	9,461	S-1547-771-19	49.0	9,461	S-1547-779-19	49.0	9,461
S-1547-767-18	49.0	9,461	S-1547-772-19	49.0	9,461	S-1547-780-19	49.0	9,461
S-1547-768-19	49.0	9,461	S-1547-777-19	49.0	9,461	S-1547-781-19	49.0	9,461
S-1547-769-19	49.0	9,461	S-1547-778-19	49.0	9,461	S-1547-797-19	49.0	9,461
S-1547-770-19	49.0	9,461						

This TEOR operation is permitted to transfer 4.09 MMscf/day or (at 1,000 btu/scf) 4,090 MMBtu/day. The total natural gas allowed by the 13 steam generators, worst case, would be (13 x 1,440) - 4,090 = 14,630 MMBtu/day. Each generator is capable of burning a full 1,440 MMBtu day of TEOR gas resulting in 1,440 x 0.0143 = 20.6 lb-SO_x/day.

The annual amount of SO_x per generator is then calculated as follows:

$$\frac{\left[\left(\frac{14,630 \text{ MMBtu}}{\text{day}} \right) \frac{0.002 \text{ lb} \cdot \text{SO}_x}{\text{MMBtu}} + \left(\frac{4,090 \text{ MMBtu}}{\text{day}} \right) \frac{0.0143 \text{ lb} \cdot \text{SO}_x}{\text{MMBtu}} \right] \times 365}{13 \text{ steam generators}} = 2,464 \frac{\text{lb} \cdot \text{SO}_x}{\text{year}}$$

This is summarized in the following table (typical of all steam generators in this project):

SO _x Emissions		
Each Unit (same for all units)	20.6 lb/day	2,464 lb/year

There will be no change to the permitted level of PM₁₀ as a result of this project. The total allowed PM₁₀ will be removed from the TEOR operation and added to the individual steam generator permits as a specific limiting condition (SLC).

These units are currently permitted to burn 1,440 MMBtu/day of fuel with a PM emission factor of 0.005 lb/MMBtu. The TEOR permit allows these generators to share an additional 55.9 lb-PM₁₀/day through the following condition:

- Particulate matter (as PM₁₀) emissions from TEOR gas incineration shall not exceed 55.9 lb/day (shared with all District approved steam generators). [District NSR Rule]

The total natural gas allowed by the 13 steam generators, worst case, would be (13 x 1,440) - 4,090 = 14,630 MMBtu/day.

$$\left(\frac{14,630 \text{ MMBtu}}{\text{day}} \right) \frac{0.005 \text{ lb} \cdot \text{PM}_{10}}{\text{MMBtu}} + \frac{55.9 \text{ lb} \cdot \text{PM}_{10}}{\text{day}} = 129.1 \frac{\text{lb} \cdot \text{PM}_{10}}{\text{day}}$$

This daily PM₁₀ SLC results in an annual SLC of 365 x 129.1 = 47,122 lb-PM₁₀/year.

VOC Emissions from the TEOR operation remain unchanged from 410.6 lb/day and 149,869 lb/year (listed on permit to operate).

3. Pre-Project Stationary Source Potential to Emit (SSPE1)

SSPE1 calculations are necessary to aid the following determinations:

- If the facility is becoming a new Major Source, or
- An offset threshold will be surpassed, or
- A Stationary Source Increase in Permitted Emissions (SSPE) public notice is triggered

Pursuant to Section 4.9 of District Rule 2201, the Pre-Project Stationary Source Potential to Emit (SSPE1) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary

Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

Facility emissions are already above the Offset and Major Source Thresholds for all pollutants. There is no increase in potential emissions for any of the units, for any pollutant in this project; therefore, SSPE1 calculations are not necessary.

4. Post-Project Stationary Source Potential to Emit (SSPE2)

SSPE2 calculations are necessary to aid the following determinations:

- If the facility is becoming a new Major Source,
- An offset threshold will be surpassed, or
- An SSIPE public notice is triggered

Pursuant to Section 4.10 of District Rule 2201, the Post-Project Stationary Source Potential to Emit (SSPE2) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

Facility emissions are already above the Offset and Major Source Thresholds for all pollutants. There is no increase in potential emissions for any of the units, for any pollutant in this project. The potential to emit NO_x will decrease in accordance with District Rule 4320. Therefore, SSPE2 calculations are not necessary.

5. Major Source Determination

Pursuant to Section 3.24 of District Rule 2201, a major source is a stationary source a Post-Project Stationary Source Potential to Emit (SSPE2), equal to or exceeding one or more of the Major Source threshold values (excluding ERCs banked onsite that have not been used onsite).

This source is an existing Major Source for all pollutants and will remain so. No change in Major Source status is proposed or expected as a result of this project.

6. Baseline Emissions (BE)

The BE calculation (in lb/year) is performed on a pollutant-by-pollutant basis to determine the amount of offsets required, where necessary, when the SSPE1 is greater than the offset threshold. This project is exempt from offsets pursuant to Rule 2201, Section 4.6.8 as the modification is being made solely to comply with Rule 4320. Therefore, BE calculations are not required.

7. Major Modification

This facility is an existing major source for all air contaminants.

Significant is defined under Part 51.165(x) as a net emissions increase in the potential of a source to emit any affected pollutant equal to or exceeding any applicable thresholds. For existing major sources in the San Joaquin Valley Air Basin, which is non-attainment for Ozone and PM₁₀, a major modification occurs if the Net Emissions Increases (NEI) is equal to or greater than one or more of the following threshold values when calculated on actual to PE basis:

Major Modification Thresholds (Existing Major Source)			
Pollutant	Project PE (lb/year)	Threshold (lb/year)	Major Modification?
NO _x	>50,000	50,000	Yes ¹
SO _x	>80,000	80,000	Yes ¹
PM ₁₀	>30,000	30,000	Yes ¹
VOC	>50,000	50,000	Yes ¹

Therefore, this project is a major modification and public notice is required.

8. Federal Major Modification

Pursuant to Rule 2201 Section 3.17 to determine if a project is a Federal major modification, the calculation procedure in 40 CFR 51.165(a)(2)(ii) shall be used.

This calculation procedure states that if the sum of the differences between the projected actual emissions and the baseline actual emissions (for existing emission units) or the sum of the potentials to emit (for new emission units) is significant, i.e. greater than the values listed in Rule 2201 Table 3-1, the project is a Federal major modification.

For existing emission units where there is no increase in design capacity the projected actual emissions (PAE) are equal to the emission rate at which the unit is projected to emit in any one year selected by the operator within 5 years after the unit resumes normal operation (10 years for existing units with an increase in design capacity). This projection is made by the operator and must be based on all relevant information, e.g. expected business activity.

For emission units (other than electric utility steam generating units) the baseline actual emissions (BAE) are calculated based on any 24 month period selected by the operator within the previous 10 year period. These emissions must not include any non-compliant operation

¹ Due to the large number of affected units proposed by Aera for Rule 4320 compliance, this project (considering that steam generators typically have actual emissions below their permitted emission levels) is presumed to cross one or more major modification thresholds.

In calculating the emission increase (PAE – BAE), the portion of the emissions after the project that the unit could have actually emitted (during the same period used to determine BAE) that are unrelated to the particular project and emissions due to increased product demand are excluded.

For rule compliance projects, the difference between the PAE and the BAE (excluding emissions that the unit could have emitted during the baseline period) for pollutants targeted by the subject rule will be a negative value.

Additionally, it can reasonably be concluded that the difference between the PAE and the BAE (excluding emissions that the unit could have emitted during the baseline period) for non-targeted pollutants will be zero as any increase in actual emissions (after the project) would be due to increases in business activity and not due to the modification itself. Such emission increases are excluded when calculating the emission increase.

For the reasons stated above, this rule compliance project will not result in a significant emission increase and therefore is not a Federal major modification.

VIII. COMPLIANCE

District Rule 2201 New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

1. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis for the following*:

- a. Any new emissions unit with a potential to emit exceeding two pounds per day,
- b. The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
- c. Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or
- d. Any new or modified emissions unit, in a stationary source project, which results in a Major Modification.

*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

However, BACT shall not be required for the following:

4.2.3 For existing facilities, the installation or modification of an emission control technique performed solely for the purpose of compliance with the requirements of District, State or Federal air pollution control laws, regulations, or orders, as approved by the APCO, shall be exempt from Best Available Control Technology for all air pollutants, provided all of the following conditions are met:

4.2.3.1 There shall be no increase in the physical or operational design of the existing facility, except for those changes to the design needed for the installation or modification of the emission control technique itself;

- 4.2.3.2 There shall be no increase in the permitted rating or permitted operating schedule of the permitted unit;
- 4.2.3.3 There shall be no increase in emissions from the stationary source that will cause or contribute to any violation of a National Ambient Air Quality Standard, Prevention of Significant Deterioration increment, or Air Quality Related Value in Class I areas; and
- 4.2.3.4 The project shall not result in an increase in permitted emissions or potential to emit of more than 25 tons per year of NO_x, or 25 tons per year of VOC, or 15 tons per year of SO_x, or 15 tons per year of PM₁₀, or 50 tons per year of CO.

Since each of the above-listed criteria are met, BACT is not required for any pollutant.

B. Offsets

1. Offset Applicability

The proposed modifications are solely for compliance with Rule 4320, and are exempt from offsets if the following criteria are satisfied. Rule 2201, Section 4.6.8 provides the following exemption from offsets.

Emission offsets shall not be required for the following:

- 4.6.8 For existing facilities, the installation or modification of an emission control technique performed solely for the purpose of compliance with the requirements of District, State or Federal air pollution control laws, regulations, or orders, as approved by the APCO, shall be exempt from offset requirements for all air pollutants provided all of the following conditions are met:
 - 4.6.8.1 There shall be no increase in the physical or operational design of the existing facility, except for those changes to the design needed for the installation or modification of the emission control technique itself;
 - 4.6.8.2 There shall be no increase in the permitted rating or permitted operating schedule of the permitted unit;
 - 4.6.8.3 There shall be no increase in emissions from the stationary source that will cause or contribute to any violation of a National Ambient Air Quality Standard, Prevention of Significant Deterioration increment, or Air Quality Related Value in Class I areas; and
 - 4.6.8.4 The project shall not result in an increase in permitted emissions or potential to emit of more than 25 tons per year of NO_x, or 25 tons per year of VOC, or 15 tons per year of SO_x, or 15 tons per year of PM-10, or 50 tons per year of CO.

Since each of the above-listed criteria are met, offsets are not required for any pollutant.

2. Quantity of Offsets Required

As seen above, the project meets the exemption requirements of section 4.6.8 of District Rule 2201; therefore offset calculations are not necessary and offsets are not required for this project.

C. Public Notification

1. Applicability

Public noticing is required for:

- a. Any new Major Source, which is a new facility that is also a Major Source,
- b. Major Modifications,
- c. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
- d. Any project which results in the offset thresholds being surpassed, and/or
- e. Any project with an SSIPE of greater than 20,000 lb/year for any pollutant.

a. New Major Source

As demonstrated in section VII.C.5 above, the facility is not becoming a Major Source as a result of this project.

b. Major Modification

As demonstrated in VII.C.7, this project constitutes a Major Modification; therefore, public noticing for Major Modification purposes is required.

c. PE > 100 lb/day

Applications which include a new emissions unit with a PE greater than 100 pounds during any one day for any pollutant will trigger public noticing requirements. There are no new emissions units associated with this project; therefore public noticing is not required for this project for Potential to Emit exceeding the 100 lb/day limit.

d. Offset Threshold

Public notification is required if the Pre-Project Stationary Source Potential to Emit (SSPE1) is increased from a level below the offset threshold to a level exceeding the emissions offset threshold, for any pollutant.

There is no increase in permitted emissions as a result of this project. Therefore, the SSPE is not increasing with this project and an offset threshold cannot be surpassed as a result of this project. A public notice will not be required for offset threshold purposes.

e. SSIPE > 20,000 lb/year

An SSIPE exceeding 20,000 pounds per year for any one pollutant triggers public notice, where $SSIPE = SSPE2 - SSPE1$.

There is no increase in permitted emissions as a result of this project. As a result, SSPE is not increasing with this project. Therefore, the SSIPE is zero for all pollutants and public notice will not be required for SSIPE purposes.

2. Public Notice Action

As discussed above, public noticing is required for this project for it being a major modification. Therefore, public notice documents will be submitted to the California Air Resources Board (CARB) and a public notice will be published in a local newspaper of general circulation prior to the issuance of the ATC for this equipment.

D. Daily Emission Limits (DELs)

Daily Emissions Limitations (DELs) and other enforceable conditions are required by Section 3.15 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. Per Sections 3.15.1 and 3.15.2, the DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

The DELs for these units are based on the use of natural gas as a fuel and will be stated in the form of emission factors as shown (no changes to conditions listed on permit S-1547-819 are required for Rule 2201 compliance):

For all steam generator units:

- The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201]
- Total TEOR gas from permit S-1547-819 incinerated in steam generators S-1547-766 to '-772, '-777 to '-781, and '-797 shall not exceed 4.09 MMscf/day. [District Rule 2201]
- Permittee shall maintain accurate daily records of gas flowrate delivered to steam generators S-1547-766 to '-772, '-777 to '-781, and '-797. [District Rule 2201]
- Total PM10 emissions for steam generators S-1547-766 to '-772, '-777 to '-781, and '-797 shall not exceed 129.1 lb/day nor 47,122 lb/yr. [District Rule 2201]
- Sulfur content of fuel combusted shall not exceed 5 grains-S/100 scf. [District Rules 2201 and 4320]
- Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: XX.X lb-NOx/day, XXX lb-NOx/yr, XX.X lb-CO/day, and XXX lb-CO/yr. [District Rules 2201, 4305, 4306, and 4320]

S-1547-766-16, '-767-16, '-768-17, '-769-17, '-770-17, '-771-16, '-772-16, '-777-17, '-778-17, '-779-16, '-780-16, '-781-16, '-797-17:

- Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 7 ppmvd NOx @ 3% O2 or 0.008 lb-NOx/MMBtu or XX ppmvd CO @ 3% O2 or X.XXX lb-CO/MMBtu. [District Rules 2201, 4305, 4306, and 4320]

S-1547-766-17, '-767-17, '-768-18, '-769-18, '-770-18, '-771-17, '-772-17, '-777-18, '-778-18, '-779-17, '-780-17, '-781-17, '-797-18:

- Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 9 ppmvd NO_x @ 3% O₂ or 0.011 lb-NO_x/MMBtu or XX ppmvd CO @ 3% O₂ or X.XXX lb-CO/MMBtu. [District Rules 2201, 4305, 4306, and 4320]

S-1547-771-18, '-772-18, '-779-19, '-780-18, '-781-18:

- Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 12 ppmvd NO_x @ 3% O₂ or 0.014 lb-NO_x/MMBtu or XX ppmvd CO @ 3% O₂ or X.XXX lb-CO/MMBtu. [District Rules 2201, 4305, 4306, and 4320]

E. Compliance Assurance

1. Source Testing

This unit is subject to District Rule 4305, *Boilers, Steam Generators and Process Heaters, Phase 2*, District Rule 4306, *Boilers, Steam Generators and Process Heaters, Phase 3*, and District Rule 4320, *Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5 MMBtu/hr*. Source testing requirements, in accordance with District Rules 4305, 4306, and 4320 have been included on the ATC.

2. Monitoring

As required by District Rule 4305, *Boilers, Steam Generators and Process Heaters, Phase 2*, District Rule 4306, *Boilers, Steam Generators and Process Heaters, Phase 3*, and District Rule 4320, *Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5 MMBtu/hr*, this unit is subject to monitoring requirements. Monitoring requirements, in accordance with District Rules 4305, 4306, and 4320 have been included on the ATC.

The following condition (previously listed on the current PTOs) will remain on the ATCs to ensure compliance:

- Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201]

3. Recordkeeping

As required by District Rule 4305, *Boilers, Steam Generators and Process Heaters, Phase 2*, District Rule 4306, *Boilers, Steam Generators and Process Heaters, Phase 3*, and District Rule 4320, *Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5 MMBtu/hr* this unit is subject to recordkeeping requirements. Recordkeeping requirements, in accordance with District Rules 4305, 4306, and 4320 have been included on the ATC.

4. Reporting

No reporting is required to demonstrate compliance with Rule 2201.

District Rule 2520 Federally Mandated Operating Permits

Aera has a Title V permit. The changes authorized by these ATCs constitute a minor modification of their Title V permit. As discussed above, the facility has applied for a Certificate of Conformity (COC); therefore, the facility must apply to modify their Title V permit with an administrative amendment prior to operating with the proposed modifications and permit conditions will be listed as follows:

- {1830} 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 2201]
- {1831} 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]

District Rule 4001 New Source Performance Standards

40 CFR Part 60, Subpart Dc applies to Small Industrial-Commercial-Industrial Steam Generators between 10 MMBtu/hr and 100 MMBtu/hr (post-6/9/89 construction, modification or, reconstruction).

The steam generators listed in this project are subject to this subpart. However, the units are exclusively natural gas-fired and there are no applicable performance standard requirements from this subpart that natural gas-fired steam generators are subject to.

The applicable monthly fuel use record keeping requirements of section 60.48c(g) will be satisfied by District Rule 4306 and Rule 4320 requirements.

The applicable 2-year record retention requirement of section 60.48c(i) will be subsumed by the District's 5-year record retention requirement.

40 CFR Part 60, Subpart A, section 14, defines the meaning of modification to which the standards are applicable. §60.14, paragraph (e)(5) states that the following will not be considered as a modification: *"the addition or use of any system or device whose primary function is the reduction of air pollutants, except when an emission control system is removed or replaced by a system which the Administrator determines to be less environmentally beneficial"*.

No newly constructed or reconstructed units are proposed in this project, nor is the unit being modified (as defined above). The proposed modifications are intended solely for compliance with Rule 4320 and will not result in net emissions increase of any pollutant regulated by the standard. Therefore, the steam generators are not affected facilities under Subpart Dc

District Rule 4101 Visible Emissions

District Rule 4101, Section 5.0, indicates that no air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour, which is dark or darker than Ringlemann 1 or equivalent to 20% opacity.

A permit condition will be listed on the permit as follows:

- {15} No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]

Therefore, compliance with District Rule 4101 requirements is expected.

District Rule 4102 Nuisance

Section 4.0 prohibits discharge of air contaminants, which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. Therefore, compliance with this rule is expected.

A permit condition will be listed on the permit as follows:

- {98} No air contaminant shall be released into the atmosphere, which causes a public nuisance. [District Rule 4102]

California Health & Safety Code 41700 (Health Risk Assessment)

District Policy APR 1905 - Risk Management Policy for Permitting New and Modified Sources specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

Since the applicant is not proposing an increase in emissions with this project, a health risk assessment is not necessary and no further risk analysis is required.

District Rule 4201 Particulate Matter Concentration

Section 3.1 prohibits discharge of dust, fumes, or total particulate matter into the atmosphere from any single source operation in excess of 0.1 grain per dry standard cubic foot.

F-Factor for NG:	8,578 dscf/MMBtu at 60 °F
PM10 Emission Factor:	0.0490 lb-PM10/MMBtu
Percentage of PM as PM10 in Exhaust:	100%
Exhaust Oxygen (O ₂) Concentration:	3%
Excess Air Correction to F Factor =	$\frac{20.9}{(20.9 - 3)} = 1.17$

$$GL = \left(\frac{0.005 \text{ lb} - \text{PM}}{\text{MMBtu}} \times \frac{7,000 \text{ grain}}{\text{lb} - \text{PM}} \right) / \left(\frac{8,578 \text{ ft}^3}{\text{MMBtu}} \times 1.17 \right)$$

$$GL = 0.003 \text{ grain/dscf} < 0.1 \text{ grain/dscf}$$

Therefore, compliance with District Rule 4201 requirements is expected and a permit condition will be listed on the permit as follows:

- {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]

District Rule 4301 Fuel Burning Equipment

This rule specifies maximum emission rates in lb/hr for SO₂, NO₂, and combustion contaminants (defined as total PM in Rule 1020). This rule also limits combustion contaminants to ≤ 0.1 gr/scf. According to AP 42 (Table 1.4-2, footnote c), all PM emissions from natural gas combustion are less than 1 μm in diameter.

District Rule 4301 Limits (lb/hr)			
Pollutant	NO ₂	Total PM	SO ₂
Worst case pollutants	1.13 _{15 ppm}	0.88 _{0.014 lb/MMBtu}	0.89 _{0.0143 lb/MMbtu}
Rule Limit (lb/hr)	140	10	200

The above table indicates compliance with the maximum lb/hr emissions in this rule; therefore, continued compliance is expected.

District Rule 4304 - Equipment Tuning Procedure for Boilers, Steam Generators and Process Heaters

Pursuant to District Rules 4305 and 4306, Section 6.3.1, the steam generator is not required to tune since it follows District approved Alternate Monitoring scheme A, where the applicable emission limits are periodically monitored. Therefore, the units are not subject to this rule.

District Rule 4305 Boilers, Steam Generators and Process Heaters – Phase 2

These units are natural gas-fired with a maximum heat input of 62.5 MMBtu/hr. Pursuant to Section 2.0 of District Rule 4305, the units are subject to District Rule 4305, *Boilers, Steam Generators and Process Heaters – Phase 2*.

In addition, these units are also subject to District Rule 4306, *Boilers, Steam Generators and Process Heaters – Phase 3*.

Since the emissions limits of District Rule 4306 and all other requirements are equivalent or more stringent than District Rule 4305 requirements, compliance with District Rule 4306 requirements will satisfy the requirements of District Rule 4305.

District Rule 4306 Boilers, Steam Generators and Process Heaters – Phase 3

These units are natural gas-fired with a maximum heat input of 62.5 MMBtu/hr. Pursuant to Section 2.0 of District Rule 4306, these units are subject to District Rule 4306.

In addition, these units are also subject to *District Rule 4320, Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5 MMBtu/hr*.

The subject units are currently in compliance with the applicable provisions of this rule. Source testing, monitoring and recordkeeping requirements of Rule 4320 are equal to or more stringent than the requirements of this rule; therefore, continued compliance is expected

District Rule 4320 Advance Emission Reduction Options for Boilers, Steam Generators and Process Heaters Greater than 5 MMBtu/hr

This rule limits NO_x, CO, SO₂ and PM₁₀ emissions from boilers, steam generators and process heaters rated greater than 5 MMBtu/hr. This rule also provides a compliance option of payment of fees in proportion to the actual amount of NO_x emitted over the previous year.

The units in this project are all rated at greater than 5 MMBtu/hr heat input. Therefore this rule applies.

Section 5.1 NO_x Emission Limits

Section 5.1 states that an operator of a unit(s) subject to this rule shall comply with all applicable requirements of the rule and one of the following, on a unit-by-unit basis:

- 5.1.1 Operate the unit to comply with the emission limits specified in Sections 5.2 and 5.4; or
- 5.1.2 Pay an annual emissions fee to the District as specified in Section 5.3 and comply with the control requirements specified in Section 5.4; or
- 5.1.3 Comply with the applicable Low-use Unit requirements of Section 5.5.

Section 5.2.1 states that on and after the indicated Compliance Deadline units shall not be operated in a manner which exceeds the applicable NO_x limit specified in Table 1 of this rule.

With a maximum heat input of 62.5 MMBtu/hr for these steam generators the applicable emission limit category Section 5.2, Table 1, Category C.2 (units firing on >50% PUC quality gas) and C.3 (unit firing on <50% PUC quality gas), from District Rule 4320 are as follows:

C. Oilfield Steam Generators			
1. Units with a total rated heat input > 5.0 MMBtu/hr to <u>20.0 MMBtu/hr	a) Standard Schedule 9 ppmv or 0.011 lb/MMBtu; or	July 1, 2011	July 1, 2012
	b) Enhanced Schedule 6 ppmv or 0.007 lb/MMBtu	January 1, 2013	January 1, 2014
2. Units with a total rated heat input > 20.0 MMBtu/hr	a) Standard Schedule 7 ppmv or 0.008 lb/MMBtu; or	July 1, 2009	July 1, 2010
	b) Staged Enhanced Schedule Initial Limit 9 ppmv or 0.011 lb/MMBtu; and	July 1, 2011	July 1, 2012
	Final Limit 5 ppmv or 0.0062 lb/MMBtu	January 1, 2013	January 1, 2014
3. Units firing on less than 50%, by volume, PUC quality gas.	Staged Enhanced Schedule Initial Limit 12 ppmv or 0.014 lb/MMBtu; and	July 1, 2010	July 1, 2011
	Final Limit 9 ppmv or 0.011 lb/MMBtu	January 1, 2013	January 1, 2014

As shown in the previous table, the 7, 9, and 12 ppmvd @ 3% O₂ NO_x limit proposed for the steam generators, for both standard and staged schedules, in this project are consistent with one of the compliance options allowed by the rule. Aera has also requested ATCs that address the SO_x emissions limit only in the event that the fee payment option for NO_x control is chosen. The source testing and alternative monitoring requirements of the rule are consistent with those in existing Rule 4306 and will be included on the requested Authorities to Construct. Additionally, the emissions factor limits (worst case) of 0.002 lb SO₂/MMBtu are consistent with the particulate matter and SO_x control requirements. Therefore, compliance with this rule is expected.

Daily emission limiting conditions have been included in section VIII.D. Compliance with section 5.2 is expected.

Section 5.4 Particulate Matter Control Requirements

5.4.1 To limit particulate matter emissions, an operator shall comply with one of the following requirements:

5.4.1.1 On and after the applicable NO_x Compliance Deadline specified in Section 5.2 Table 1, operators shall fire units exclusively on PUC-quality natural gas, commercial propane, butane, or liquefied petroleum gas, or a combination of such gases;

- 5.4.1.2 On and after the applicable NOx Compliance Deadline specified in Section 5.2 Table 1, operators shall limit fuel sulfur content to no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet; or
- 5.4.1.3 On and after the applicable NOx Compliance Deadline specified in Section 5.2 Table 1, operators shall install and properly operate an emission control system that reduces SO₂ emissions by at least 95% by weight; or limit exhaust SO₂ to less than or equal to 9 ppmv corrected to 3.0% O₂.
- 5.4.1.4 Notwithstanding the compliance deadlines indicated in Sections 5.4.1.1 through 5.4.1.3, refinery units, which require modification of refinery equipment to reduce sulfur emissions, shall be in compliance with the applicable requirement in Section 5.4.1 no later than July 1, 2013.

Aera will address the particulate matter in the following manner (conditions previously proposed in the Rule 2201 compliance section VIII.D):

All units (fuel gas limited to 5 Grain-S/100 scf per Section 5.4.1.2):

- Emission rates, except during startup, shutdown, and refractory curing from the combustion of natural gas, shall not exceed any of the following: 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 Rules 424]
- Fuel gas sulfur content shall not exceed 5 grain of total sulfur (as H₂S) per 100 dscf of fuel gas. [District Rules 2201 and 4320]

Compliance with section 5.4 is expected.

Section 5.6 Startup and Shutdown Provisions

Section 5.6 states that on and after the full compliance deadline specified in Section 5.0, the applicable emission limits of Sections 5.2 Table 1 and 5.5.2 shall not apply during start-up or shutdown provided an operator complies with the requirements specified in Sections 5.6.1 through 5.6.5.

Aera has proposed to retain existing start-up and shutdown duration limits of 2 hours and 2 hours, respectively. Emissions during start-up and shutdown will not be subject to the emission limits in Sections 5.2 and 5.2.2. The following conditions will be listed on the ATCs:

- 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]

Shakedown Provision

Aera is requesting approval of a 60-day "shakedown" period for units to be retrofitted, after installation of the new low-NOx combustion equipment or the combustion modifications authorized by these ATCs. Aera requests that the units be allowed to operate at the current NOx emission limit of 15 ppmv @ 3% O₂ until the shakedown period is completed.

The shakedown period will not exceed 60 days nor extend beyond the applicable Rule 4320 compliance deadline. The following condition will be added to ATCs proposing a NO_x reduction:

- During a shakedown period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO_x emission rate shall not exceed 15 ppmvd @ 3% O₂ or 0.018 lb/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline selected for this unit. Permittee shall maintain a record of the date of initial operation and shall make such records readily available for District inspection upon request. [District Rules 4305, 4306, and 4320]

Section 5.7 Monitoring Provisions

Section 5.7.1 requires that permit units subject to District Rule 4320, Section 5.2 shall either install and maintain an operational APCO approved Continuous Emission Monitoring System (CEMS) for NO_x, CO and O₂, or implement an APCO-approved alternate monitoring.

Consistent with current permit requirements, Aera proposes to continue implementing Alternate Monitoring Scheme A (pursuant to District Policy SSP-1105), which requires that monitoring of NO_x, CO, and O₂ exhaust concentrations shall be conducted at least once per month (in which a source test is not performed) using a portable analyzer. The following conditions will be incorporated into the ATCs to ensure compliance with the requirements of the proposed alternate monitoring plan:

- {4063} 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 analyzer that meets District specifications. Measurement shall be made with the FGR system in the mode of operation (closed or open) in which it was used in the preceding 30 days. 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, 4306, and 4320]
- {4064} 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, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320]
- {4065} 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]
- {4066} The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent by volume 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, 4306 and 4320]

Section 5.7.6 requires operators complying with Sections 5.4.1.1 or 5.4.1.2 to provide an annual fuel analysis to the District unless a more frequent sampling and reporting period is included in the Permit To Operate. Sulfur analysis shall be performed in accordance with the test methods in Section 6.2.

Since existing conditions requires sampling no less than semi-annually, they are more stringent than Rule 4320. Therefore, the rule references for these conditions will be updated to include Rule 4320.

- 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, and Rule 4320] Federally Enforceable Through Title V Permit

Or (depending on which condition is listed on current operating permit),

- If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 4468, D 4084, D3246 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.4.2; 4305, 6.2.1, 4320, and 4351, 6.2.1] Federally Enforceable Through Title V Permit

The following condition will be listed to enforce the reporting requirement of this section:

- Operator shall provide an annual fuel analysis to the District. [District Rule 4320]

Section 5.8 Compliance Determination

Section 5.8.1 requires that the operator of any unit shall have the option of complying with either the applicable heat input (lb/MMBtu), emission limits or the concentration (ppmv) emission limits specified in Section 5.2. The emission limits selected to demonstrate compliance shall be specified in the source test proposal pursuant to Rule 1081 (Source Sampling).

Therefore, the following condition will be listed on the ATCs as follows:

- {2976} The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320]

Section 5.8.2 requires that all emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0. Therefore, the following permit condition will be listed on the ATCs as follows:

- {2972} 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. 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]

Section 5.8.4 requires that for emissions monitoring pursuant to Sections 5.7.1 and 6.3.1 using a portable NO_x analyzer as part of an APCO approved Alternate Emissions Monitoring System, emission readings 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. Therefore, the following previously listed permit condition will be on the ATCs as follows:

- {2937} 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]

Section 5.8.5 requires that for emissions source testing performed pursuant to Section 6.3.1 for the purpose of determining compliance with an applicable standard or numerical limitation of this rule, the arithmetic average of three (3) 30-consecutive-minute test runs shall apply. If two (2) of three (3) runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit.

Therefore, the following permit condition will be listed on the permit as follows:

- {2980} 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]

Section 6.1 Recordkeeping

Section 6.1 requires that the records required by Sections 6.1.1 through 6.1.5 shall be maintained for five calendar years and shall be made available to the APCO and EPA upon request. Failure to maintain records or information contained in the records that demonstrate noncompliance with the applicable requirements of this rule shall constitute a violation of this rule.

A permit condition will be listed on the permit as follows:

- All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320]

Section 6.2, Test Methods

Section 6.2 identifies the following test methods as District-approved source testing methods for the pollutants listed:

Pollutant	Units	Test Method Required
NO _x	ppmv	EPA Method 7E or ARB Method 100
NO _x	lb/MMBtu	EPA Method 19
CO	ppmv	EPA Method 10 or ARB Method 100
Stack Gas O ₂	%	EPA Method 3 or 3A, or ARB Method 100
Stack Gas Velocities	ft/min	EPA Method 2
Stack Gas Moisture Content	%	EPA Method 4

The following permit conditions will be listed on the permit as follows:

- 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]

Section 6.3, Compliance Testing

Section 6.3.1 requires that this unit be tested to determine compliance with the applicable requirements of section 5.1 and 5.2.3 not less than once every 12 months. Upon demonstrating compliance on two consecutive compliance source tests, the following source test may be deferred for up to thirty-six months.

The following permit conditions will be listed on the ATCs:

All modifications except S-1547-766-18, '-767-18, '-768-19, '-769-19, '-770-19, '-771-19, '-772-19, '-777-19, '-778-19, '-779-19, '-780-19, '-781-19, '-797-19 (units not installing equipment):

- Source testing to measure NO_x and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320]

All modifications:

- Source testing to measure NO_x and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320]
- 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]

In addition, since the applicant has proposed to use pre-approved Alternate Monitoring Scheme "A" using a portable analyzer, the tune-up requirements listed in Section 6.3.1 are not applicable to these units. Section 6.3.1 also requires that, during the 36-month source testing interval, the owner/operator shall monthly monitor the operational characteristics recommended by the unit manufacturer. Since the pre-approved Alternate Monitoring Scheme "A" using a portable analyzer requires monthly monitoring of NO_x, CO, and O₂ exhaust emissions concentrations, operational characteristics monitoring requirement is satisfied, and no further discussion is required.

Section 6.4, Emission Control Plan (ECP)

Section 6.4 requires the operator of any unit to submit to APCO for approval an Emissions Control Plan no later than January 1, 2010. Aera has submitted an Emissions Control Plan.

Section 7.0, Compliance Schedule

Section 7.0 identifies the dates by which the operator shall submit an application for an ATC and the date by which the owner shall demonstrate compliance with this rule.

The units will be in compliance with the emissions limits listed in Table 1, Section 5.2 of this rule, and periodic monitoring and source testing as required by District Rule 4320. Therefore, requirements of the compliance schedule, as listed in Section 7.0 of District Rule 4320, are satisfied. No further discussion is required.

Conclusion

Conditions will be incorporated into the permit in order to ensure compliance with each section of this rule, see attached draft permits in Appendix C. Therefore, compliance with District Rule 4320 requirements is expected.

District Rule 4401 Steam-Enhanced Crude Oil Production Well Vents

Rule 4401 requires VOC emissions from the steam-enhanced well to be reduced by at least 99% by weight. The MOCO casing gas collection system (S-1547-819) currently satisfies the requirements of this rule with collected vapors being either incinerated in steam generators or injected into a DOGGR-approved disposal well, resulting in at least 99% reduction.

This Rule was most recently amended on December 14, 2006. Current operating permit S-1547-819-8 was evaluated September 17, 2009 in project S-1094105. Therefore, continued compliance is expected.

District Rule 4405 Oxides of Nitrogen Emissions from Existing Steam Generators Used in Thermally Enhanced Oil Recovery – Central and Western Kern County Fields

This rule limits NOx emissions from existing steam generators used in thermally enhanced oil recovery operations prior to August 22, 1986. The steam generators in this project are subject to a NOx limit well below the 0.14 lb/MMBTU limit allowed by this rule for natural gas-fired units. Therefore, continued compliance is expected.

District Rule 4406 Sulfur Compounds from Oil-Field Steam Generators – Kern County

This rule limits SOx emissions from existing steam generators used in oil field operations prior to September 12, 1979. Sulfur compound emissions (as S) from the steam generators in this project are limited to an average rate below the 0.11 lb/MMBTU limit for sulfur (as S) allowed by the rule. Continued compliance is expected.

District Rule 4801 Sulfur Compounds

A person shall not discharge into the atmosphere sulfur compounds, which would exist as a liquid or gas at standard conditions, exceeding in concentration at the point of discharge: 0.2 % by volume calculated as SO₂, on a dry basis averaged over 15 consecutive minutes.

Using the ideal gas equation and the emission factors presented in Section VII, the sulfur compound emissions are calculated as follows:

$$\text{Volume SO}_2 = \frac{n RT}{P}$$

With:

$$\begin{aligned} N &= \text{moles SO}_2 \\ T \text{ (Standard Temperature)} &= 60^\circ\text{F} = 520^\circ\text{R} \\ P \text{ (Standard Pressure)} &= 14.7 \text{ psi} \\ R \text{ (Universal Gas Constant)} &= \frac{10.73 \text{ psi} \cdot \text{ft}^3}{\text{lb} \cdot \text{mol} \cdot ^\circ\text{R}} \end{aligned}$$

$$\frac{0.0143 \text{ lb} - \text{SO}_x}{\text{MMBtu}} \times \frac{\text{MMBtu}}{8,578 \text{ dscf}} \times \frac{1 \text{ lb} \cdot \text{mol}}{64 \text{ lb}} \times \frac{10.73 \text{ psi} \cdot \text{ft}^3}{\text{lb} \cdot \text{mol} \cdot ^\circ\text{R}} \times \frac{520^\circ\text{R}}{14.7 \text{ psi}} \times \frac{1,000,000 \cdot \text{parts}}{\text{million}} = 10 \frac{\text{parts}}{\text{million}}$$

$$\text{Sulfur Concentration} = 10 \frac{\text{parts}}{\text{million}} < 2,000 \text{ ppmv (or 0.2\%)}$$

Therefore, compliance with District Rule 4801 requirements is expected.

California Health & Safety Code 42301.6 (School Notice)

This facility is not located within 1,000 feet of a school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

California Environmental Quality Act (CEQA)

The California Environmental Quality Act (CEQA) requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The San Joaquin Valley Unified Air Pollution Control District (District) adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities.
- Identify the ways that environmental damage can be avoided or significantly reduced.
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

The District performed an Engineering Evaluation (this document) for the proposed project and determined that the activity will occur at an existing facility and the project involves negligible expansion of the existing use. Furthermore, the District determined that the activity will not have a significant effect on the environment. The District finds that the activity is categorically exempt from the provisions of CEQA pursuant to CEQA Guideline § 15031 (Existing Facilities), and finds that the project is exempt per the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment (CEQA Guidelines §15061(b)(3)).

IX. RECOMMENDATION

Compliance with all applicable rules and regulations is expected. Pending a successful NSR public noticing period and upon completion of the 45-day EPA notice issue Authorities to Construct subject to the permit conditions on the attached draft Authorities to Construct in Appendix C.

X. BILLING INFORMATION

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
All Steam Generators	3020-02-H	62.5 MMBtu/hr	\$1,030.00
S-1547-819-9	3020-09-A	900 wells	\$8,406.00

Appendices

- Appendix A: Current Base Documents
 Appendix B: TVFORM-009
 Appendix C: Draft ATCs

Appendix A

Current Base Documents

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-766-9

EXPIRATION DATE: 05/31/2007

SECTION: NW35 **TOWNSHIP:** 12N **RANGE:** 24W

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN LOW NOX BURNER WITH FLUE GAS RECIRCULATION (FGR) AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819. (MOCO #604) (SOUTH MIDWAY)

PERMIT UNIT REQUIREMENTS

1. 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
2. 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
3. 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
4. Sulfur emissions shall not exceed 0.11 lb of sulfur per million BTU of heat input, averaged over 3 - one hour periods. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas; multiplying the reported sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by a combination of source testing for sulfur compounds and fuel analysis. Compliance may be demonstrated for this unit individually, or by showing that the total emissions of sulfur compounds from all steam generators located at the stationary source with ATC or PTO issued prior to September 12, 1979 does not exceed the emissions that would result if each unit was operating in compliance with the specified limit. [Kern County Rule 424 and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
5. 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
6. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6; or EPA Method 6B; or EPA Method 8; or ARB Methods 8 or 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculate emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

7. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 4468, D 4084, D3246 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.4.2; 4305, 6.2.1, and 4351, 6.2.1] Federally Enforceable Through Title V Permit
8. 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
9. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), 110 (Madera) 402 (Madera), 404 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 405 (Madera), 408 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 407.2 (Kern, Tulare, Kings, Stanislaus, and San Joaquin), and 408.2 (Merced). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
10. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements of SJVUAPCD Rules 4201 (Amended December 17, 1992), 4301 (Amended December 17, 1992), 4406 (Amended December 17, 1992, and Rule 4801 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
11. 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
12. This unit has not been used to produce electricity for sale in 1985 or on or after November 15, 1990. Therefore, the requirements of 40 CFR 72.6(b) do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
13. Steam generator shall be equipped with operational fuel gas and vapor recovery gas volumetric flow meters. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Only natural gas or a combination of natural gas and TEOR well vent vapors from well vent vapor control system S-1547-819 shall be used as fuel in this steam generator. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Maximum heat input to steam generator shall not exceed 1,440 MMBTU/day. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Sulfur compound emissions (as SO2) and PM10 emissions from the combustion of well vent vapors from S-1547-819 in this steam generator and all other devices authorized to combust such vapors shall not exceed the limits established on S-1547-819. [District Rules 2201, 4201, 3.1 and 4301, 5.1, 5.2.1 and 5.2.3] Federally Enforceable Through Title V Permit
17. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emission rates, except during startup, shutdown, and refractory curing from the combustion of natural gas, shall not exceed any of the following: PM10: 0.005 lb/MMBTU or SOx (as SO2): 0.002 lb/MMBtu. [District Rules 2201, 2520, 4201, 4301, 4406, 4801 and Kern County Rules 424] Federally Enforceable Through Title V Permit
19. Emission rates, except during startup, shutdown, and refractory curing shall not exceed any of the following: VOC: 0.003 lb/MMBtu, NOx (as NO2): 0.018 lb/MMBtu or 15 ppmv @ 3% O2, or CO: 0.030 lb/MMBtu or 40 ppmv @ 3% O2. [District Rules 2201, 2520, 4301, 4305, 4306, 4405 and Kern County Rule 425] 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.

20. 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
21. Emission rates shall not exceed any of the following: VOC: 4.3 lb/day, NO_x (as NO₂): 49.0 lb/day or 9461 lb/year, or CO: 43.2 lb/day [District Rule 2201] Federally Enforceable Through Title V Permit
22. Duration of start-up and shutdown shall not exceed 2 hours each per occurrence. [District Rule 4305 and 4306] Federally Enforceable Through Title V Permit
23. Duration of refractory curing shall not exceed 30 hours each per occurrence. Permittee shall notify the District in writing prior to refractory curing. [District Rule 2080] Federally Enforceable Through Title V Permit
24. Permittee shall maintain records of duration of each start-up and shutdown, and refractory curing, for a period of five years and make such records readily available for District inspection upon request. [District Rule 4306] Federally Enforceable Through Title V Permit
25. 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
26. 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, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
27. 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
28. 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
29. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 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.

30. 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
31. 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
32. 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
33. 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 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D4468, D3246, D3246, D4084 or double GC for H₂S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rule 1081, and 4305, 6.2] Federally Enforceable Through Title V Permit
34. 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
35. 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
36. Formerly S-1511-123

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-767-9

EXPIRATION DATE: 05/31/2007

SECTION: NW35 TOWNSHIP: 12N RANGE: 24W

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR WITH COEN QLN-ULN BURNER AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819 (MOCO #605) (SOUTH MIDWAY)

PERMIT UNIT REQUIREMENTS

1. 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
2. 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
3. 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
4. Sulfur emissions shall not exceed 0.11 lb of sulfur per million BTU of heat input, averaged over 3 - one hour periods. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas; multiplying the reported sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by a combination of source testing for sulfur compounds and fuel analysis. Compliance may be demonstrated for this unit individually, or by showing that the total emissions of sulfur compounds from all steam generators located at the stationary source with ATC or PTO issued prior to September 12, 1979 does not exceed the emissions that would result if each unit was operating in compliance with the specified limit. [Kern County Rule 424 and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
5. 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
6. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6; or EPA Method 6B; or EPA Method 8; or ARB Methods 8 or 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculate emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

7. If the unit is fired on noncertified gaseous fuel and compliance with SO_x emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 4468, D 4084, D3246 or grab sample analysis by double GC for H₂S and mercaptans performed in the laboratory. [District Rule 2520, 9.4.2; 4305, 6.2.1, and 4351, 6.2.1] Federally Enforceable Through Title V Permit
8. 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
9. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), 110 (Madera) 402 (Madera), 404 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 405 (Madera), 408 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 407.2 (Kern, Tulare, Kings, Stanislaus, and San Joaquin), and 408.2 (Merced). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
10. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements of SJVUAPCD Rules 4201 (Amended December 17, 1992), 4301 (Amended December 17, 1992), 4406 (Amended December 17, 1992, and Rule 4801 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
11. 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
12. This unit has not been used to produce electricity for sale in 1985 or on or after November 15, 1990. Therefore, the requirements of 40 CFR 72.6(b) do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
13. Steam generator shall be equipped with operational fuel gas and vapor recovery gas volumetric flow meters. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Only natural gas or a combination of natural gas and TEOR well vent vapors from well vent vapor control system S-1547-819 shall be used as fuel in this steam generator. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Maximum heat input to steam generator shall not exceed 1,440 MMBTU/day. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Sulfur compound emissions (as SO₂) and PM₁₀ emissions from the combustion of well vent vapors from S-1547-819 in this steam generator and all other devices authorized to combust such vapors shall not exceed the limits established on S-1547-819. [District NSR Rule and District Rules 4201, 3.1; 4301, 5.1, 5.2.1, and 5.2.3] Federally Enforceable Through Title V Permit
17. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District NSR Rule] Federally Enforceable Through Title V Permit
18. Emission rates, except during startup, shutdown, and refractory curing from the combustion of natural gas, shall not exceed any of the following: PM₁₀: 0.005 lb/MMBTU or SO_x (as SO₂): 0.002 lb/MMBTU. [District NSR Rule and District Rules 2520, 4201, 4301, 4406, 4801 and Kern County Rule 424] Federally Enforceable Through Title V Permit
19. 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): 0.018 lb/MMBTU or 15 ppmv @ 3% O₂, or CO: 0.030 lb/MMBTU or 40 ppmv @ 3% O₂. [District NSR Rule and District Rules 2520, 4301, 4305, 4306, 4405 and Kern County Rule 425] 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.

20. 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
21. Emission rates shall not exceed any of the following: VOC: 4.3 lb/day, NO_x (as NO₂): 49.0 lb/day or 9461 lb/year, or CO: 43.2 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Duration of start-up and shutdown shall not exceed 2 hours each per occurrence. [District Rules 4305, 5.5.6.1 and 4306, 5.3.1] Federally Enforceable Through Title V Permit
23. Duration of refractory curing shall not exceed 30 hours each per occurrence. Permittee shall notify the District in writing prior to refractory curing. [District Rule 2080] Federally Enforceable Through Title V Permit
24. Permittee shall maintain records of duration of each start-up and shutdown, and refractory curing, for a period of five years and make such records readily available for District inspection upon request. [District Rule 4306, 6.1.4] Federally Enforceable Through Title V Permit
25. 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, 5.4.2.1 and 4306, 5.4.2.1] Federally Enforceable Through Title V Permit
26. 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, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 5.4.2.1 and 4306, 5.4.2.1] Federally Enforceable Through Title V Permit
27. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.4.2.1 and 4306, 5.4.2.1] Federally Enforceable Through Title V Permit
28. 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, 5.4.2.1 and 4306, 5.4.2.1] Federally Enforceable Through Title V Permit
29. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 5.5.2 and 4306, 5.5.2] Federally Enforceable Through Title V Permit

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

30. 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, 6.3.1 and 4306, 6.3.1] Federally Enforceable Through Title V Permit
31. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5.1 and 4306, 5.5.1] Federally Enforceable Through Title V Permit
32. 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
33. 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 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D4468, D3246, D3246, D4084 or double GC for H₂S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 1081; 4305, 6.2; and 4306, 6.2] Federally Enforceable Through Title V Permit
34. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5.5 and 4306, 5.5.5] Federally Enforceable Through Title V Permit
35. 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, 6.1; and 4306, 6.1] Federally Enforceable Through Title V Permit
36. Formerly S-1511-124

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-768-10

EXPIRATION DATE: 05/31/2007

SECTION: NW35 **TOWNSHIP:** 12N **RANGE:** 24W

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS-FIRED STEAM GENERATOR, WITH COEN QLN-ULN BURNER, FLUE GAS RECIRCULATION AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819. (MOCO #606) (SOUTH MIDWAY)

PERMIT UNIT REQUIREMENTS

1. 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
2. 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
3. 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
4. Sulfur emissions shall not exceed 0.11 lb of sulfur per million BTU of heat input, averaged over 3 - one hour periods. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas; multiplying the reported sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by a combination of source testing for sulfur compounds and fuel analysis. Compliance may be demonstrated for this unit individually, or by showing that the total emissions of sulfur compounds from all steam generators located at the stationary source with ATC or PTO issued prior to September 12, 1979 does not exceed the emissions that would result if each unit was operating in compliance with the specified limit. [Kern County Rule 424 and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
5. 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
6. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6; or EPA Method 6B; or EPA Method 8; or ARB Methods 8 or 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculate emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

7. If the unit is fired on noncertified gaseous fuel and compliance with SO_x emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 4468, D 4084, D3246 or grab sample analysis by double GC for H₂S and mercaptans performed in the laboratory. [District Rule 2520, 9.4.2; 4305, 6.2.1, and 4351, 6.2.1] Federally Enforceable Through Title V Permit
8. 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
9. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), 110 (Madera) 402 (Madera), 404 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 405 (Madera), 408 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 407.2 (Kern, Tulare, Kings, Stanislaus, and San Joaquin), and 408.2 (Merced). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
10. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements of SJVUAPCD Rules 4201 (Amended December 17, 1992), 4301 (Amended December 17, 1992), 4406 (Amended December 17, 1992, and Rule 4801 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
11. 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
12. This unit has not been used to produce electricity for sale in 1985 or on or after November 15, 1990. Therefore, the requirements of 40 CFR 72.6(b) do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
13. Steam generator shall be equipped with operational fuel gas and vapor recovery gas volumetric flow meters. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Only natural gas or a combination of natural gas and TEOR well vent vapors from well vent vapor control system S-1547-819 shall be used as fuel in this steam generator. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Maximum heat input to steam generator shall not exceed 1,440 MMBTU/day. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Sulfur compound emissions (as SO₂) and PM₁₀ emissions from the combustion of well vent vapors from S-1547-819 in this steam generator and all other devices authorized to combust such vapors shall not exceed the limits established on S-1547-819. [District Rules 2201, 4201, 3.1 and 4301, 5.1, 5.2.1 and 5.2.3] Federally Enforceable Through Title V Permit
17. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emission rates, except during startup, shutdown, and refractory curing from the combustion of natural gas, shall not exceed any of the following: PM₁₀: 0.005 lb/MMBtu or SO_x (as SO₂): 0.002 lb/MMBtu. [District Rules 2201, 2520, 4201, 4301, 4406, 4801 and Kern County Rules 424] Federally Enforceable Through Title V Permit
19. 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): 0.018 lb/MMBtu or 15 ppmv @ 3% O₂, or CO: 0.030 lb/MMBtu or 40 ppmv @ 3% O₂. [District Rules 2201, 2520, 4301, 4305, 4306, 4405 and Kern County Rule 425] 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.

20. 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
21. Emission rates shall not exceed any of the following: VOC: 4.3 lb/day, NO_x (as NO₂): 49.0 lb/day or 9461 lb/year, or CO: 43.2 lb/day [District Rule 2201] Federally Enforceable Through Title V Permit
22. Duration of start-up and shutdown shall not exceed 2 hours each per occurrence. [District Rule 4305 and 4306] Federally Enforceable Through Title V Permit
23. Duration of refractory curing shall not exceed 30 hours each per occurrence. Permittee shall notify the District in writing prior to refractory curing. [District Rule 2080] Federally Enforceable Through Title V Permit
24. Permittee shall maintain records of duration of each start-up and shutdown, and refractory curing, for a period of five years and make such records readily available for District inspection upon request. [District Rule 4306] Federally Enforceable Through Title V Permit
25. 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
26. If 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, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
27. 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
28. 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
29. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 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.

30. 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
31. 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
32. 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
33. 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 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D4468, D3246, D3246, D4084 or double GC for H₂S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rule 1081, and 4305, 6.2] Federally Enforceable Through Title V Permit
34. 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
35. 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
36. Formerly S-1511-125

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-769-10

EXPIRATION DATE: 05/31/2007

SECTION: NW35 TOWNSHIP: 12N RANGE: 24W

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS-FIRED STEAM GENERATOR, WITH COEN QLN-ULN BURNER, FLUE GAS RECIRCULATION AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819. (MOCO #607) (SOUTH MIDWAY)

PERMIT UNIT REQUIREMENTS

1. 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
2. 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
3. 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
4. Sulfur emissions shall not exceed 0.11 lb of sulfur per million BTU of heat input, averaged over 3 - one hour periods. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas; multiplying the reported sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by a combination of source testing for sulfur compounds and fuel analysis. Compliance may be demonstrated for this unit individually, or by showing that the total emissions of sulfur compounds from all steam generators located at the stationary source with ATC or PTO issued prior to September 12, 1979 does not exceed the emissions that would result if each unit was operating in compliance with the specified limit. [Kern County Rule 424 and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
5. 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
6. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6; or EPA Method 6B; or EPA Method 8; or ARB Methods 8 or 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculate emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

7. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 4468, D 4084, D3246 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.4.2; 4305, 6.2.1, and 4351, 6.2.1] Federally Enforceable Through Title V Permit
8. 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
9. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), 110 (Madera) 402 (Madera), 404 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 405 (Madera), 408 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 407.2 (Kern, Tulare, Kings, Stanislaus, and San Joaquin), and 408.2 (Merced). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
10. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements of SJVUAPCD Rules 4201 (Amended December 17, 1992), 4301 (Amended December 17, 1992), 4406 (Amended December 17, 1992, and Rule 4801 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
11. 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
12. This unit has not been used to produce electricity for sale in 1985 or on or after November 15, 1990. Therefore, the requirements of 40 CFR 72.6(b) do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
13. Steam generator shall be equipped with operational fuel gas and vapor recovery gas volumetric flow meters. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Only natural gas or a combination of natural gas and TEOR well vent vapors from well vent vapor control system S-1547-819 shall be used as fuel in this steam generator. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Maximum heat input to steam generator shall not exceed 1,440 MMBTU/day. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Sulfur compound emissions (as SO2) and PM10 emissions from the combustion of well vent vapors from S-1547-819 in this steam generator and all other devices authorized to combust such vapors shall not exceed the limits established on S-1547-819. [District Rules 2201, 4201, 3.1 and 4301, 5.1, 5.2.1 and 5.2.3] Federally Enforceable Through Title V Permit
17. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emission rates, except during startup, shutdown, and refractory curing from the combustion of natural gas, shall not exceed any of the following: PM10: 0.005 lb/MMBtu or SOx (as SO2): 0.002 lb/MMBtu. [District Rules 2201, 2520, 4201, 4301, 4406, 4801 and Kern County Rules 424] Federally Enforceable Through Title V Permit
19. Emission rates, except during startup, shutdown, and refractory curing shall not exceed any of the following: VOC: 0.003 lb/MMBtu, NOx (as NO2): 0.018 lb/MMBtu or 15 ppmv @ 3% O2, or CO: 0.030 lb/MMBtu or 40 ppmv @ 3% O2. [District Rules 2201, 2520, 4301, 4305, 4306, 4405 and Kern County Rule 425] 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.

20. 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
21. Emission rates shall not exceed any of the following: VOC: 4.3 lb/day, NO_x (as NO₂): 49.0 lb/day or 9461 lb/year, or CO: 43.2 lb/day [District Rule 2201] Federally Enforceable Through Title V Permit
22. Duration of start-up and shutdown shall not exceed 2 hours each per occurrence. [District Rule 4305 and 4306] Federally Enforceable Through Title V Permit
23. Duration of refractory curing shall not exceed 30 hours each per occurrence. Permittee shall notify the District in writing prior to refractory curing. [District Rule 2080] Federally Enforceable Through Title V Permit
24. Permittee shall maintain records of duration of each start-up and shutdown, and refractory curing, for a period of five years and make such records readily available for District inspection upon request. [District Rule 4306] Federally Enforceable Through Title V Permit
25. 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
26. If 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, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
27. 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
28. 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
29. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 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.

30. 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
31. 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
32. 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
33. 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 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D4468, D3246, D3246, D4084 or double GC for H₂S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rule 1081, and 4305, 6.2] Federally Enforceable Through Title V Permit
34. 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
35. 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
36. Formerly S-1511-126

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-770-9

EXPIRATION DATE: 05/31/2007

SECTION: NW35 **TOWNSHIP:** 12N **RANGE:** 24W

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR, WITH COEN ULN BURNER, FLUE GAS RECIRCULATION AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819. (MOCO #608) (SOUTH MIDWAY)

PERMIT UNIT REQUIREMENTS

1. 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
2. Copies of all fuel invoices showing quantity and delivery points of supplier-certified gas delivered and copies of quality terms of supplier-certified 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
3. 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
4. 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel 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
5. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6; or EPA Method 6B; or EPA Method 8; or ARB Methods 8 or 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculate emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
6. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D3246 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.4.2; 4305, 6.2.1, and 4351, 6.2.1] 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, 4305, 4306, and 4351, 6.2.1] 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.

8. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements of SJVUAPCD Rules 4201 (Amended December 17, 1992), 4301 (Amended December 17, 1992), 4406 (Amended December 17, 1992, and Rule 4801 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
9. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), 110 (Madera) 402 (Madera), 404 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 405 (Madera), 408 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 407.2 (Kern, Tulare, Kings, Stanislaus, and San Joaquin), and 408.2 (Merced). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
10. 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
11. This unit has not been used to produce electricity for sale in 1985 or on or after November 15, 1990. Therefore, the requirements of 40 CFR 72.6(b) do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
12. Steam generator shall be equipped with operational fuel gas and vapor recovery gas volumetric flow meters. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Only natural gas or a combination of natural gas and TEOR well vent vapors from well vent vapor control system S-1547-819 shall be used as fuel in this steam generator. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Duration of start-up and shutdown shall not exceed 2 hours each per occurrence. [District Rule 4306] Federally Enforceable Through Title V Permit
15. Duration of refractory curing shall not exceed 30 hours each per occurrence. Permittee shall notify the District in writing prior to refractory curing. [District Rule 2080] Federally Enforceable Through Title V Permit
16. Permittee shall maintain records of duration of each start-up, shutdown and refractory curing, per a period of five years and make such records readily available for District inspection upon request. [District Rule 2080 & 4306] Federally Enforceable Through Title V Permit
17. Maximum heat input to steam generator shall not exceed 1,440 MMBTU/day. [District NSR Rule] Federally Enforceable Through Title V Permit
18. Emissions from this unit, except during startup, shutdown, and refractory curing, shall not exceed any of the following limits: NO_x (as NO₂): 0.018 lb/MMBtu or 15 ppmv @ 3% O₂, VOC: 0.003 lb/MMBtu or CO: 50 ppmv @ 3% O₂. [District NSR Rule] Federally Enforceable Through Title V Permit
19. Emission rates during 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, and 4801] Federally Enforceable Through Title V Permit
20. PM-10 emissions from the combustion of natural gas in this permit unit shall not exceed 0.005 lb/MMBTU. [District NSR Rule] Federally Enforceable Through Title V Permit
21. Sulfur compound emissions (as SO₂) from the combustion of natural gas in this permit unit shall not exceed 0.002 lb/MM Btu. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Sulfur compound emissions (as SO₂) and PM₁₀ emissions from the combustion of well vent vapors from S-1547-819 in this steam generator and all other devices authorized to combust such vapors shall not exceed the limits established on S-1547-819. [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.

23. 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. Measurement shall be made with the FGR system in the mode of operation (closed or open) in which it was used in the preceding 30 days. 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, 4306, and 2520] Federally Enforceable Through Title V Permit
24. If the NOX and/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, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
25. The permittee shall maintain records of: (1) the date and time of NOX, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOX and CO concentrations corrected to 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
26. During the 36-month source testing interval the operator shall tune the unit at least twice per calendar year, (from four to eight months apart) by a qualified technician in accordance with the procedure described in Rule 4304, and shall monitor, on a monthly basis, the unit's operational characteristics recommended by the manufacturer. Semi-annual tuning is not required if emissions are monitored monthly with a portable analyzer. [District Rule 4306] Federally Enforceable Through Title V Permit
27. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
28. All emissions measurements for NOx and CO shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
29. Performance testing for NOx and CO emissions shall be conducted not less than once every 12 months, except as provided below. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
30. Performance testing for NOx and CO emissions shall be conducted not less than once every 36 months if compliance is demonstrated on two consecutive annual tests. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
31. If permittee fails any performance testing for NOx or CO emissions when testing not less than once every 36 months, compliance with NOx and CO emissions testing shall be less than once every 12 months. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
32. 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.

33. 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 ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SO_x (lb/MMBtu) - EPA Method 6 or ARB Method 100 and EPA Method 19, fuel gas sulfur content - ASTM D3246 or double GC for H₂S and mercaptans. [District Rules 1081, and 4305, 6.2] Federally Enforceable Through Title V Permit
34. 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
35. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2201, 2520, 4305, and 4306] Federally Enforceable Through Title V Permit
36. Formerly S-1511-127

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-771-9

EXPIRATION DATE: 05/31/2007

SECTION: NW35 TOWNSHIP: 12N RANGE: 24W

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN LOW NOX BURNER WITH FLUE GAS RECIRCULATION (FGR) AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819. (MOCO #701) (SOUTH MIDWAY)

PERMIT UNIT REQUIREMENTS

1. 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
2. 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
3. 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
4. Sulfur emissions shall not exceed 0.11 lb of sulfur per million BTU of heat input, averaged over 3 - one hour periods. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas; multiplying the reported sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by a combination of source testing for sulfur compounds and fuel analysis. Compliance may be demonstrated for this unit individually, or by showing that the total emissions of sulfur compounds from all steam generators located at the stationary source with ATC or PTO issued prior to September 12, 1979 does not exceed the emissions that would result if each unit was operating in compliance with the specified limit. [Kern County Rule 424 and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
5. 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
6. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6; or EPA Method 6B; or EPA Method 8; or ARB Methods 8 or 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculate emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

7. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 4468, D 4084, D3246 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.4.2; 4305, 6.2.1, and 4351, 6.2.1] Federally Enforceable Through Title V Permit
8. 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
9. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), 110 (Madera) 402 (Madera), 404 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 405 (Madera), 408 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 407.2 (Kern, Tulare, Kings, Stanislaus, and San Joaquin), and 408.2 (Merced). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
10. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements of SJVUAPCD Rules 4201 (Amended December 17, 1992), 4301 (Amended December 17, 1992), 4406 (Amended December 17, 1992, and Rule 4801 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
11. 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
12. This unit has not been used to produce electricity for sale in 1985 or on or after November 15, 1990. Therefore, the requirements of 40 CFR 72.6(b) do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
13. Steam generator shall be equipped with operational fuel gas and vapor recovery gas volumetric flow meters . [District NSR Rule] Federally Enforceable Through Title V Permit
14. Only natural gas or a combination of natural gas and TEOR well vent vapors from well vent vapor control system S-1547-819 shall be used as fuel in this steam generator. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Maximum heat input to steam generator shall not exceed 1,440 MMBTU/day. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Sulfur compound emissions (as SO2) and PM10 emissions from the combustion of well vent vapors from S-1547-819 in this steam generator and all other devices authorized to combust such vapors shall not exceed the limits established on S-1547-819. [District Rules 2201, 4201, 3.1 and 4301, 5.1, 5.2.1 and 5.2.3] Federally Enforceable Through Title V Permit
17. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emission rates, except during startup, shutdown, and refractory curing from the combustion of natural gas, shall not exceed any of the following: PM10: 0.005 lb/MMBTU or SOx (as SO2): 0.002 lb/MMBtu. [District Rules 2201, 2520, 4201, 4301, 4406, 4801 and Kern County Rules 424]
19. Emission rates, except during startup, shutdown, and refractory curing shall not exceed any of the following: VOC: 0.003 lb/MMBtu, NOx (as NO2): 0.018 lb/MMBtu or 15 ppmv @ 3% O2, or CO: 0.030 lb/MMBtu or 40 ppmv @ 3% O2. [District Rules 2201, 2520, 4301, 4305, 4306, 4405 and Kern County Rule 425] 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.

20. 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
21. Emission rates shall not exceed any of the following: VOC: 4.3 lb/day, NO_x (as NO₂): 49.0 lb/day or 9461 lb/year, or CO: 43.2 lb/day [District Rule 2201] Federally Enforceable Through Title V Permit
22. Duration of start-up and shutdown shall not exceed 2 hours each per occurrence. [District Rule 4305 and 4306] Federally Enforceable Through Title V Permit
23. Duration of refractory curing shall not exceed 30 hours each per occurrence. Permittee shall notify the District in writing prior to refractory curing. [District Rule 2080] Federally Enforceable Through Title V Permit
24. Permittee shall maintain records of duration of each start-up and shutdown, and refractory curing, for a period of five years and make such records readily available for District inspection upon request. [District Rule 4306] Federally Enforceable Through Title V Permit
25. 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
26. 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, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
27. 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
28. 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
29. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 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.

30. 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
31. 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
32. 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
33. 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 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D4468, D3246, D3246, D4084 or double GC for H₂S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rule 1081, and 4305, 6.2] Federally Enforceable Through Title V Permit
34. 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
35. 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
36. Formerly S-1511-128

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-772-9

EXPIRATION DATE: 05/31/2007

SECTION: NW35 TOWNSHIP: 12N RANGE: 24W

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN LOW NOX BURNER WITH FLUE GAS RECIRCULATION (FGR) AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819. (MOCO #702) (SOUTH MIDWAY)

PERMIT UNIT REQUIREMENTS

1. 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
2. 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
3. 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
4. Sulfur emissions shall not exceed 0.11 lb of sulfur per million BTU of heat input, averaged over 3 - one hour periods. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas; multiplying the reported sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by a combination of source testing for sulfur compounds and fuel analysis. Compliance may be demonstrated for this unit individually, or by showing that the total emissions of sulfur compounds from all steam generators located at the stationary source with ATC or PTO issued prior to September 12, 1979 does not exceed the emissions that would result if each unit was operating in compliance with the specified limit. [Kern County Rule 424 and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
5. 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
6. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6; or EPA Method 6B; or EPA Method 8; or ARB Methods 8 or 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculate emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

7. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 4468, D 4084, D3246 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.4.2; 4305, 6.2.1, and 4351, 6.2.1] Federally Enforceable Through Title V Permit
8. 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
9. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), 110 (Madera) 402 (Madera), 404 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 405 (Madera), 408 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 407.2 (Kern, Tulare, Kings, Stanislaus, and San Joaquin), and 408.2 (Merced). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
10. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements of SJVUAPCD Rules 4201 (Amended December 17, 1992), 4301 (Amended December 17, 1992), 4406 (Amended December 17, 1992, and Rule 4801 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
11. 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
12. This unit has not been used to produce electricity for sale in 1985 or on or after November 15, 1990. Therefore, the requirements of 40 CFR 72.6(b) do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
13. Steam generator shall be equipped with operational fuel gas and vapor recovery gas volumetric flow meters . [District NSR Rule] Federally Enforceable Through Title V Permit
14. Only natural gas or a combination of natural gas and TEOR well vent vapors from well vent vapor control system S-1547-819 shall be used as fuel in this steam generator. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Maximum heat input to steam generator shall not exceed 1,440 MMBTU/day. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Sulfur compound emissions (as SO2) and PM10 emissions from the combustion of well vent vapors from S-1547-819 in this steam generator and all other devices authorized to combust such vapors shall not exceed the limits established on S-1547-819. [District Rules 2201, 4201, 3.1 and 4301, 5.1, 5.2.1 and 5.2.3] Federally Enforceable Through Title V Permit
17. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emission rates, except during startup, shutdown, and refractory curing from the combustion of natural gas, shall not exceed any of the following: PM10: 0.005 lb/MMBTU or SOx (as SO2): 0.002 lb/MMBtu. [District Rules 2201, 2520, 4201, 4301, 4406, 4801 and Kern County Rules 424] Federally Enforceable Through Title V Permit
19. Emission rates, except during startup, shutdown, and refractory curing shall not exceed any of the following: VOC: 0.003 lb/MMBtu, NOx (as NO2): 0.018 lb/MMBtu or 15 ppmv @ 3% O2, or CO: 0.030 lb/MMBtu or 40 ppmv @ 3% O2. [District Rules 2201, 2520, 4301, 4305, 4306, 4405 and Kern County Rule 425] 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.

20. 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
21. Emission rates shall not exceed any of the following: VOC: 4.3 lb/day, NO_x (as NO₂): 49.0 lb/day or 9461 lb/year, or CO: 43.2 lb/day [District Rule 2201] Federally Enforceable Through Title V Permit
22. Duration of start-up and shutdown shall not exceed 2 hours each per occurrence. [District Rule 4305 and 4306] Federally Enforceable Through Title V Permit
23. Duration of refractory curing shall not exceed 30 hours each per occurrence. Permittee shall notify the District in writing prior to refractory curing. [District Rule 2080] Federally Enforceable Through Title V Permit
24. Permittee shall maintain records of duration of each start-up and shutdown, and refractory curing, for a period of five years and make such records readily available for District inspection upon request. [District Rule 4306] Federally Enforceable Through Title V Permit
25. 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
26. 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, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
27. 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
28. 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
29. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 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.

30. 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
31. 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
32. 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
33. 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 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D4468, D3246, D3246, D4084 or double GC for H₂S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rule 1081, and 4305, 6.2] Federally Enforceable Through Title V Permit
34. 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
35. 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
36. Formerly S-1511-129

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-777-10

EXPIRATION DATE: 05/31/2007

SECTION: NW35 TOWNSHIP: 12N RANGE: 24W

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR, WITH A COEN QLN-ULN BURNER, FLUE GAS RECIRCULATION AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819. (MOCO #505) (SOUTH MIDWAY)

PERMIT UNIT REQUIREMENTS

1. 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
2. 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
3. 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
4. Sulfur emissions shall not exceed 0.11 lb of sulfur per million BTU of heat input, averaged over 3 - one hour periods. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas; multiplying the reported sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by a combination of source testing for sulfur compounds and fuel analysis. Compliance may be demonstrated for this unit individually, or by showing that the total emissions of sulfur compounds from all steam generators located at the stationary source with ATC or PTO issued prior to September 12, 1979 does not exceed the emissions that would result if each unit was operating in compliance with the specified limit. [Kern County Rule 424 and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
5. 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
6. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6; or EPA Method 6B; or EPA Method 8; or ARB Methods 8 or 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculate emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

7. If the unit is fired on noncertified gaseous fuel and compliance with SO_x emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 4468, D 4084, D3246 or grab sample analysis by double GC for H₂S and mercaptans performed in the laboratory. [District Rule 2520, 9.4.2; 4305, 6.2.1, and 4351, 6.2.1] Federally Enforceable Through Title V Permit
8. 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
9. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), 110 (Madera) 402 (Madera), 404 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 405 (Madera), 408 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 407.2 (Kern, Tulare, Kings, Stanislaus, and San Joaquin), and 408.2 (Merced). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
10. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements of SJVUAPCD Rules 4201 (Amended December 17, 1992), 4301 (Amended December 17, 1992), 4406 (Amended December 17, 1992, and Rule 4801 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
11. 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
12. This unit has not been used to produce electricity for sale in 1985 or on or after November 15, 1990. Therefore, the requirements of 40 CFR 72.6(b) do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
13. Steam generator shall be equipped with operational fuel gas and vapor recovery gas volumetric flow meters. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Only natural gas or a combination of natural gas and TEOR well vent vapors from well vent vapor control system S-1547-819 shall be used as fuel in this steam generator. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Maximum heat input to steam generator shall not exceed 1,440 MMBTU/day. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Sulfur compound emissions (as SO₂) and PM₁₀ emissions from the combustion of well vent vapors from S-1547-819 in this steam generator and all other devices authorized to combust such vapors shall not exceed the limits established on S-1547-819. [District Rules 2201, 4201, 3.1 and 4301, 5.1, 5.2.1 and 5.2.3] Federally Enforceable Through Title V Permit
17. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emission rates, except during startup, shutdown, and refractory curing from the combustion of natural gas, shall not exceed any of the following: PM₁₀: 0.005 lb/MMBTU or SO_x (as SO₂): 0.002 lb/MMBtu. [District Rules 2201, 2520, 4201, 4301, 4406, 4801 and Kern County Rules 424] Federally Enforceable Through Title V Permit
19. 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): 0.018 lb/MMBtu or 15 ppmv @ 3% O₂, or CO: 0.030 lb/MMBtu or 40 ppmv @ 3% O₂. [District Rules 2201, 2520, 4301, 4305, 4306, 4405 and Kern County Rule 425] 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.

20. 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
21. Emission rates shall not exceed any of the following: VOC: 4.3 lb/day, NO_x (as NO₂): 49.0 lb/day or 9461 lb/year, or CO: 43.2 lb/day [District Rule 2201] Federally Enforceable Through Title V Permit
22. Duration of start-up and shutdown shall not exceed 2 hours each per occurrence. [District Rule 4305 and 4306] Federally Enforceable Through Title V Permit
23. Duration of refractory curing shall not exceed 30 hours each per occurrence. Permittee shall notify the District in writing prior to refractory curing. [District Rule 2080] Federally Enforceable Through Title V Permit
24. Permittee shall maintain records of duration of each start-up and shutdown, and refractory curing, for a period of five years and make such records readily available for District inspection upon request. [District Rule 4306] Federally Enforceable Through Title V Permit
25. 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
26. 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, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
27. 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
28. 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
29. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 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.

30. 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
31. 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
32. 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
33. 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 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D4468, D3246, D3246, D4084 or double GC for H₂S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rule 1081, and 4305, 6.2] Federally Enforceable Through Title V Permit
34. 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
35. 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
36. Formerly S-1511-134

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-778-10

EXPIRATION DATE: 05/31/2007

SECTION: NW35 TOWNSHIP: 12N RANGE: 24W

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN LOW NOX BURNER, FLUE GAS RECIRCULATION AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819, MOCO (#506) (SOUTH MIDWAY)

PERMIT UNIT REQUIREMENTS

1. 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
2. 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
3. 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
4. Sulfur emissions shall not exceed 0.11 lb of sulfur per million BTU of heat input, averaged over 3 - one hour periods. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas; multiplying the reported sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by a combination of source testing for sulfur compounds and fuel analysis. Compliance may be demonstrated for this unit individually, or by showing that the total emissions of sulfur compounds from all steam generators located at the stationary source with ATC or PTO issued prior to September 12, 1979 does not exceed the emissions that would result if each unit was operating in compliance with the specified limit. [Kern County Rule 424 and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
5. 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
6. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6; or EPA Method 6B; or EPA Method 8; or ARB Methods 8 or 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculate emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

7. If the unit is fired on noncertified gaseous fuel and compliance with SO_x emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 4468, D 4084, D3246 or grab sample analysis by double GC for H₂S and mercaptans performed in the laboratory. [District Rule 2520, 9.4.2; 4305, 6.2.1, and 4351, 6.2.1] Federally Enforceable Through Title V Permit
8. 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
9. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), 110 (Madera) 402 (Madera), 404 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 405 (Madera), 408 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 407.2 (Kern, Tulare, Kings, Stanislaus, and San Joaquin), and 408.2 (Merced). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
10. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements of SJVUAPCD Rules 4201 (Amended December 17, 1992), 4301 (Amended December 17, 1992), 4406 (Amended December 17, 1992, and Rule 4801 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
11. 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
12. This unit has not been used to produce electricity for sale in 1985 or on or after November 15, 1990. Therefore, the requirements of 40 CFR 72.6(b) do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
13. Steam generator shall be equipped with operational fuel gas and vapor recovery gas volumetric flow meters. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Only natural gas or a combination of natural gas and TEOR well vent vapors from well vent vapor control system S-1547-819 shall be used as fuel in this steam generator. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Maximum heat input to steam generator shall not exceed 1,440 MMBTU/day. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Sulfur compound emissions (as SO₂) and PM₁₀ emissions from the combustion of well vent vapors from S-1547-819 in this steam generator and all other devices authorized to combust such vapors shall not exceed the limits established on S-1547-819. [District Rules 2201, 4201, 3.1 and 4301, 5.1, 5.2.1 and 5.2.3] Federally Enforceable Through Title V Permit
17. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emission rates, except during startup, shutdown, and refractory curing from the combustion of natural gas, shall not exceed any of the following: PM₁₀: 0.005 lb/MMBTU or SO_x (as SO₂): 0.002 lb/MMBtu. [District Rules 2201, 2520, 4201, 4301, 4406, 4801 and Kern County Rules 424] Federally Enforceable Through Title V Permit
19. 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): 0.018 lb/MMBtu or 15 ppmv @ 3% O₂, or CO: 0.030 lb/MMBtu or 40 ppmv @ 3% O₂. [District Rules 2201, 2520, 4301, 4305, 4306, 4405 and Kern County Rule 425] 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.

20. 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
21. Emission rates shall not exceed any of the following: VOC: 4.3 lb/day, NO_x (as NO₂): 49.0 lb/day or 9461 lb/year, or CO: 43.2 lb/day [District Rule 2201] Federally Enforceable Through Title V Permit
22. During a "shakedown" period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO_x emission rate shall not exceed 30 ppmvd @ 3% O₂ or 0.036 lb/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4306 compliance deadline selected for this unit. Permittee shall maintain a record of the date of initial operation and shall make such records readily available for District inspection upon request. [District Rule 4306] Federally Enforceable Through Title V Permit
23. Duration of start-up and shutdown shall not exceed 2 hours each per occurrence. [District Rule 4305 and 4306] Federally Enforceable Through Title V Permit
24. Duration of refractory curing shall not exceed 30 hours each per occurrence. Permittee shall notify the District in writing prior to refractory curing. [District Rule 2080] Federally Enforceable Through Title V Permit
25. Permittee shall maintain records of duration of each start-up and shutdown, and refractory curing, for a period of five years and make such records readily available for District inspection upon request. [District Rule 4306] Federally Enforceable Through Title V Permit
26. If FGR system on unit is used intermittently, monitoring shall consist of use of a portable analyzer. If FGR system on unit is continuously used, monitoring shall consist of either use of a portable analyzer or monitoring of FGR rate based on parameters established during initial compliance source testing. If FGR system on unit is not used, monitoring shall consist of either use of a portable analyzer or monitoring of stack O₂ and burner mechanical adjustments. The alternate monitoring scheme selected for this unit shall be established prior to implementation of this Authority to Construct. [District Rule 4306] Federally Enforceable Through Title V Permit
27. If periodic monitoring of NO_x, CO, and O₂ concentrations is utilized, 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
28. If periodic monitoring of NO_x, CO, and O₂ concentrations is utilized and 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, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
29. If periodic monitoring of NO_x, CO, and O₂ concentrations is utilized, 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

30. If periodic monitoring of NO_x, CO, and O₂ concentrations is utilized, 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
31. If periodic determination of FGR rate by O₂ measurement is utilized, the flue gas recirculation rate shall be determined at least on a weekly basis by measuring the stack O₂% by volume (O_s), and windbox O₂% by volume (O_w) using the following equation: $FGR \text{ rate} = \{O_w - 20.9\} / \{O_s - 20.9\} \times 100\%$. 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 week. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
32. If periodic determination of FGR rate by O₂ measurement is utilized, the minimum flue gas recirculation rate shall be established by source testing this unit or other representative units per Rule 4305 and as approved by the District. The normal range/level shall be no lower than the minimum flue gas recirculation rate with which compliance with applicable NO_x and CO emission limits has been demonstrated through source testing at a similar firing rate. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
33. If periodic determination of FGR rate by O₂ measurement is utilized, and the flue gas recirculation rate is less than the normal range/level, the permittee shall return the flue gas recirculation rate to the normal range/level as soon as possible, but no longer than 1 hour of operation after detection. If the flue gas recirculation rate is not returned to the normal range/level within 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a source test within 60 days of the first exceedance, to demonstrate compliance with the applicable emission limits at the new flue gas recirculation rate. A District-approved portable analyzer may be used in lieu of a source test to demonstrate compliance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
34. If periodic determination of FGR rate by O₂ measurement is utilized, the permittee shall maintain records of the date and time of oxygen concentration measurements, the measured oxygen concentrations, the calculated flue gas recirculation rate, and the firing rate at the time of the oxygen concentration measurements. The records shall also include a description of any corrective action taken to maintain the flue gas recirculation rate within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
35. If monitoring of burner mechanical adjustments and O₂ concentration is utilized, the stack O₂ concentration measurement and inspection of [list mechanical adjustments/settings] shall be conducted at least on a weekly basis. 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 week. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
36. If monitoring of burner mechanical adjustments and O₂ concentration is utilized, the normal range/level of stack O₂ concentration and visible mechanical burner settings shall be established by source testing this unit or other representative units per Rule 4305 and as approved by the District. The normal range/level shall be that for which compliance with applicable NO_x and CO emission limits has been demonstrated through source testing at a similar firing rate. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
37. If monitoring of burner mechanical adjustments and O₂ concentration is utilized, normal range or level for the stack O₂ concentration and burner mechanical settings shall be re-established during each source test required by this permit. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
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38. If monitoring of burner mechanical adjustments and O2 concentration is utilized, and either the stack O2 concentration or visible mechanical burner settings are less than the normal range/level, the permittee shall return the stack O2 concentration and visible mechanical burner settings to the normal range/level as soon as possible, but no longer than 1 hour of operation after detection. If the stack O2 concentration and visible mechanical burner settings are not returned to the normal range/level within 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour, and conduct a source test within 60 days of the first exceedance, to demonstrate compliance with the applicable emission limits at the new stack O2 concentration and visible mechanical burner settings. A District-approved portable analyzer may be used in lieu of a source test to demonstrate compliance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
39. If monitoring of burner mechanical adjustments and O2 concentration is utilized, the permittee shall maintain records of the date and time of O2 measurements and burner adjustments, the measured O2 concentrations (% by volume) and firing rate at the time of O2 measurement, and the observed setting(s) for the burner. The records must also include a description of any corrective action taken to maintain the O2 concentration and the burner mechanical settings within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
40. If periodic determination of FGR rate by O2 measurement or monitoring of burner mechanical adjustments and O2 concentration is utilized, during the 36-month source testing interval, the owner/operator shall have unit tuned at least twice each calendar year, from four to eight months apart, in which it operates, by a technician that is qualified, to the satisfaction of the APCO, in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). Semi-annual tuning is not required if emissions are monitored monthly with a portable analyzer. [District Rule 4306] Federally Enforceable Through Title V Permit
41. If periodic determination of FGR rate by O2 measurement or monitoring of burner mechanical adjustments and O2 concentration is utilized, and the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rule 4306] Federally Enforceable Through Title V Permit
42. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
43. Whenever the unit is switched to operate with the flue gas recirculation (FGR) system in the closed position, compliance source testing for NOx and CO shall be conducted within 60 days of cessation of FGR operation date unless source testing with FGR system in the closed position has occurred within the previous 12 months. [District Rule 1070] Federally Enforceable Through Title V Permit
44. Source testing to measure natural gas-combustion NOx 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
45. 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
46. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305 and 4306] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
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47. 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
48. 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 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D4468, D3246, D3246, D4084 or double GC for H₂S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rule 1081, and 4305, 6.2] Federally Enforceable Through Title V Permit
49. 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
50. 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
51. Formerly S-1511-135

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-779-9

EXPIRATION DATE: 05/31/2007

SECTION: NW35 **TOWNSHIP:** 12N **RANGE:** 24W

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN LOW NOX BURNER WITH FLUE GAS RECIRCULATION (FGR) AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819. (MOCO #703) (SOUTH MIDWAY)

PERMIT UNIT REQUIREMENTS

1. 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
2. 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
3. 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
4. Sulfur emissions shall not exceed 0.11 lb of sulfur per million BTU of heat input, averaged over 3 - one hour periods. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas; multiplying the reported sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by a combination of source testing for sulfur compounds and fuel analysis. Compliance may be demonstrated for this unit individually, or by showing that the total emissions of sulfur compounds from all steam generators located at the stationary source with ATC or PTO issued prior to September 12, 1979 does not exceed the emissions that would result if each unit was operating in compliance with the specified limit. [Kern County Rule 424 and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
5. 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
6. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6; or EPA Method 6B; or EPA Method 8; or ARB Methods 8 or 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculate emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
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7. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 4468, D 4084, D3246 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.4.2; 4305, 6.2.1, and 4351, 6.2.1] Federally Enforceable Through Title V Permit
8. 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
9. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), 110 (Madera) 402 (Madera), 404 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 405 (Madera), 408 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 407.2 (Kern, Tulare, Kings, Stanislaus, and San Joaquin), and 408.2 (Merced). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
10. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements of SJVUAPCD Rules 4201 (Amended December 17, 1992), 4301 (Amended December 17, 1992), 4406 (Amended December 17, 1992, and Rule 4801 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
11. 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
12. This unit has not been used to produce electricity for sale in 1985 or on or after November 15, 1990. Therefore, the requirements of 40 CFR 72.6(b) do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
13. Steam generator shall be equipped with operational fuel gas and vapor recovery gas volumetric flow meters. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Only natural gas or a combination of natural gas and TEOR well vent vapors from well vent vapor control system S-1547-819 shall be used as fuel in this steam generator. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Maximum heat input to steam generator shall not exceed 1,440 MMBTU/day. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Sulfur compound emissions (as SO2) and PM10 emissions from the combustion of well vent vapors from S-1547-819 in this steam generator and all other devices authorized to combust such vapors shall not exceed the limits established on S-1547-819. [District Rules 2201, 4201, 3.1 and 4301, 5.1, 5.2.1 and 5.2.3] Federally Enforceable Through Title V Permit
17. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emission rates, except during startup, shutdown, and refractory curing from the combustion of natural gas, shall not exceed any of the following: PM10: 0.005 lb/MMBTU or SOx (as SO2): 0.002 lb/MMBtu. [District Rules 2201, 2520, 4201, 4301, 4406, 4801 and Kern County Rules 424] Federally Enforceable Through Title V Permit
19. Emission rates, except during startup, shutdown, and refractory curing shall not exceed any of the following: VOC: 0.003 lb/MMBtu, NOx (as NO2): 0.018 lb/MMBtu or 15 ppmv @ 3% O2, or CO: 0.030 lb/MMBtu or 40 ppmv @ 3% O2. [District Rules 2201, 2520, 4301, 4305, 4306, 4405 and Kern County Rule 425] 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.

20. 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
21. Emission rates shall not exceed any of the following: VOC: 4.3 lb/day, NO_x (as NO₂): 49.0 lb/day or 9461 lb/year, or CO: 43.2 lb/day [District Rule 2201] Federally Enforceable Through Title V Permit
22. Duration of start-up and shutdown shall not exceed 2 hours each per occurrence. [District Rule 4305 and 4306] Federally Enforceable Through Title V Permit
23. Duration of refractory curing shall not exceed 30 hours each per occurrence. Permittee shall notify the District in writing prior to refractory curing. [District Rule 2080] Federally Enforceable Through Title V Permit
24. Permittee shall maintain records of duration of each start-up and shutdown, and refractory curing, for a period of five years and make such records readily available for District inspection upon request. [District Rule 4306] Federally Enforceable Through Title V Permit
25. 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
26. 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, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
27. 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
28. 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
29. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 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.

30. For each steam generator site downstream of H₂S scavenger chemical injection points, permittee shall monitor sulfur content of the gas prior to incineration in affected steam generators on a daily basis utilizing Draeger tubes calibrated for existing sulfur species or other District-approved fuel sulfur detection method(s) or device(s). If compliance with fuel sulfur content limit(s) for the affected steam generators is demonstrated for 5 consecutive days, then the monitoring frequency shall be weekly. [District Rule 2201] Federally Enforceable Through Title V Permit
31. 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
32. 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
33. 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
34. 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 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D4468, D3246, D3246, D4084 or double GC for H₂S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rule 1081, and 4305, 6.2] Federally Enforceable Through Title V Permit
35. 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
36. 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
37. Formerly S-1511-136

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-780-10

EXPIRATION DATE: 05/31/2007

SECTION: NW35 **TOWNSHIP:** 12N **RANGE:** 24W

EQUIPMENT DESCRIPTION:

62.5MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR WITH A COEN MODEL QLNLN LOW NOX BURNER WITH FLUE GAS RECIRCULATION (FGR) AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819, (MOCO #704) (SOUTH MIDWAY)

PERMIT UNIT REQUIREMENTS

1. 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
2. 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
3. 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
4. Sulfur emissions shall not exceed 0.11 lb of sulfur per million BTU of heat input, averaged over 3 - one hour periods. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas; multiplying the reported sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by a combination of source testing for sulfur compounds and fuel analysis. Compliance may be demonstrated for this unit individually, or by showing that the total emissions of sulfur compounds from all steam generators located at the stationary source with ATC or PTO issued prior to September 12, 1979 does not exceed the emissions that would result if each unit was operating in compliance with the specified limit. [Kern County Rule 424 and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
5. 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
6. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6; or EPA Method 6B; or EPA Method 8; or ARB Methods 8 or 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculate emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

7. If the unit is fired on noncertified gaseous fuel and compliance with SO_x emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 4468, D 4084, D3246 or grab sample analysis by double GC for H₂S and mercaptans performed in the laboratory. [District Rule 2520, 9.4.2; 4305, 6.2.1, and 4351, 6.2.1] Federally Enforceable Through Title V Permit
8. 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
9. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), 110 (Madera) 402 (Madera), 404 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 405 (Madera), 408 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 407.2 (Kern, Tulare, Kings, Stanislaus, and San Joaquin), and 408.2 (Merced). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
10. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements of SJVUAPCD Rules 4201 (Amended December 17, 1992), 4301 (Amended December 17, 1992), 4406 (Amended December 17, 1992, and Rule 4801 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
11. 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
12. This unit has not been used to produce electricity for sale in 1985 or on or after November 15, 1990. Therefore, the requirements of 40 CFR 72.6(b) do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
13. Steam generator shall be equipped with operational fuel gas and vapor recovery gas volumetric flow meters. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Only natural gas or a combination of natural gas and TEOR well vent vapors from well vent vapor control system S-1547-819 shall be used as fuel in this steam generator. [District NSR Rule; PSD SJ 89-01] Federally Enforceable Through Title V Permit
15. Maximum heat input to steam generator shall not exceed 1,440 MMBTU/day. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Sulfur compound emissions (as SO₂) and PM₁₀ emissions from the combustion of well vent vapors from S-1547-819 in this steam generator and all other devices authorized to combust such vapors shall not exceed the limits established on S-1547-819. [District Rules 2201, 4201, 3.1 and 4301, 5.1, 5.2.1 and 5.2.3] Federally Enforceable Through Title V Permit
17. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emission rates, except during startup, shutdown, and refractory curing from the combustion of natural gas, shall not exceed any of the following: PM₁₀: 0.005 lb/MMBTU or SO_x (as SO₂): 0.002 lb/MMBtu. [District Rules 2201, 2520, 4201, 4301, 4406, 4801 and Kern County Rules 424] Federally Enforceable Through Title V Permit
19. 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): 0.018 lb/MMBtu or 15 ppmv @ 3% O₂, or CO: 0.030 lb/MMBtu or 40 ppmv @ 3% O₂. [District Rules 2201, 2520, 4301, 4305, 4306, 4405 and Kern County Rule 425] 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.

20. 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
21. Emission rates shall not exceed any of the following: VOC: 4.3 lb/day, NO_x (as NO₂): 49.0 lb/day or 9461 lb/year, or CO: 43.2 lb/day [District Rule 2201] Federally Enforceable Through Title V Permit
22. Duration of start-up and shutdown shall not exceed 2 hours each per occurrence. [District Rule 4305 and 4306] Federally Enforceable Through Title V Permit
23. Duration of refractory curing shall not exceed 30 hours each per occurrence. Permittee shall notify the District in writing prior to refractory curing. [District Rule 2080] Federally Enforceable Through Title V Permit
24. Permittee shall maintain records of duration of each start-up and shutdown, and refractory curing, for a period of five years and make such records readily available for District inspection upon request. [District Rule 4306] Federally Enforceable Through Title V Permit
25. 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
26. 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, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
27. 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
28. 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
29. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 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.

30. 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
31. 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
32. 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
33. 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 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D4468, D3246, D3246, D4084 or double GC for H₂S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rule 1081, and 4305, 6.2] Federally Enforceable Through Title V Permit
34. 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
35. 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
36. All equipment, facilities, or systems installed or used to achieve compliance with the terms and conditions of this permit shall at all times be maintained in good working order and be operated as efficiently as possible so as to minimize air pollutant emissions. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
37. The Regional Administrator shall be notified by telephone within 48 hours following any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner which results in an increase in emissions above any allowable emissions limit stated in the conditions below. In addition, the Regional Administrator shall be notified in writing within 15 days of any such failure. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
38. This notification shall include a description of the malfunctioning equipment or abnormal operation, the date of initial failure, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed under the conditions below, and the methods utilized to restore normal operations. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
39. Facility shall operate this unit in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable federal, State and local air quality regulations. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
40. This unit shall be equipped with oxygen controls, low NO_x burner, and a flue gas recirculation system for the control of NO_x emissions. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
41. Facility shall conduct annual performance tests for NO_x and PM₁₀ and furnish the EPA a written report of the results of such tests. The tests shall be conducted at the maximum operating capacity of the unit. Upon written request from the operator, EPA may approve the conducting of performance tests at a lower specified operating capacity. Upon written request and adequate justification, EPA may waive annual testing requirements for this unit. [PSD SJ 89-01] 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.

42. Performance tests for NOx and PM10 shall be conducted and the results reported in accordance with the test methods in 40 CFR 60, Part 60.8 and Appendix A. The following test methods shall be used: NOx - EPA methods 1 through 4 (lb/hr), and 7E (ppmv), PM10 - EPA Methods 1 through 5. Equivalent test methods may be used with prior written approval from the EPA. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
43. EPA shall be notified in writing at least 30 days prior to performance tests. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
44. For performance test purposes, sampling ports, platforms, and access shall be provided by the operator at each exhaust system in accordance with 40 CFR 60.8(e). [PSD SJ 89-01] Federally Enforceable Through Title V Permit
45. Operations during periods of startup, shutdown and malfunction shall not constitute representative conditions for the purpose of a performance test. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
46. Field or casing head gas will be sweetened as required to limit the sulfur content of the fuel to 75 gr/scf. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
47. Operator shall record hours of operation and amounts and types of fuel fired each calendar quarter. All information shall be recorded in a form suitable for inspection. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
48. Emission rates shall not exceed any of the following: PM10: 0.303 lb/hr, NOx: 2.71 lb/hr or 35 ppmv dry, @ 3% O2. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
49. Visible emissions shall not exceed ½ Ringelmann or 10% opacity. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
50. Any relaxation in the District's Determination of Compliance conditions, Authority to Construct conditions, Permit to Operate conditions, or any other subsequent permit of legally binding document that could result in an increase of the potential to emit of any pollutant from this source above the PSD applicability thresholds will require a full PSD review of the source as if construction had not yet begun. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
51. Facility shall have legal and operational responsibility and control of all air pollutant emitting activities of the MOCO TEOR project. This responsibility shall include, but not limited to: operating and maintaining the project to comply with all federal, state and local air pollution laws, regulations, permits, orders and other requirements; ensuring the emissions offsets or other reductions required for this project under permits issued by the District are obtained as required; any violation of any air pollution requirements are the legal responsibility of the facility in addition to any other legally responsible parties. Any proposed change to this condition shall require the prior written concurrence of the EPA. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
52. Facility is required to implement the conditions required by the U.S. Fish and Wildlife Service, as outlined in their Biological Opinion and Formal Consultation Response (August 30, 1990), to prevent the incidental taking (killing, harming or harassment) of endangered species that may be affected by this unit. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
53. All correspondence as required by this permit shall be forwarded to: a) Director, Air Management Division, Compliance Section (Attn: A-3-3), EPA Region IX, 75 Hawthorne Street, San Francisco, CA, 94105; b) Chief, Stationary Source Control Division, California Air Resource Board, P.O. Box 2815, Sacramento, CA, 95814; and c) Director, SJVUAPCD, 1990 East Gettysburg, Fresno, CA, 93726. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
54. Note: Formerly S-1511-137

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-781-10

EXPIRATION DATE: 05/31/2007

SECTION: NW35 TOWNSHIP: 12N RANGE: 24W

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN LOW NOX BURNER WITH FLUE GAS RECIRCULATION (FGR) AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819, (MOCO #705) (SOUTH MIDWAY)

PERMIT UNIT REQUIREMENTS

1. 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
2. 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
3. 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
4. Sulfur emissions shall not exceed 0.11 lb of sulfur per million BTU of heat input, averaged over 3 - one hour periods. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas; multiplying the reported sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by a combination of source testing for sulfur compounds and fuel analysis. Compliance may be demonstrated for this unit individually, or by showing that the total emissions of sulfur compounds from all steam generators located at the stationary source with ATC or PTO issued prior to September 12, 1979 does not exceed the emissions that would result if each unit was operating in compliance with the specified limit. [Kern County Rule 424 and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
5. 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
6. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6; or EPA Method 6B; or EPA Method 8; or ARB Methods 8 or 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculate emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

7. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 4468, D 4084, D3246 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.4.2; 4305, 6.2.1, and 4351, 6.2.1] Federally Enforceable Through Title V Permit
8. 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
9. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), 110 (Madera) 402 (Madera), 404 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 405 (Madera), 408 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 407.2 (Kern, Tulare, Kings, Stanislaus, and San Joaquin), and 408.2 (Merced). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
10. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements of SJVUAPCD Rules 4201 (Amended December 17, 1992), 4301 (Amended December 17, 1992), 4406 (Amended December 17, 1992, and Rule 4801 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
11. 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
12. This unit has not been used to produce electricity for sale in 1985 or on or after November 15, 1990. Therefore, the requirements of 40 CFR 72.6(b) do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
13. Steam generator shall be equipped with operational fuel gas and vapor recovery gas volumetric flow meters . [District NSR Rule] Federally Enforceable Through Title V Permit
14. Only natural gas or a combination of natural gas and TEOR well vent vapors from well vent vapor control system S-1547-819 shall be used as fuel in this steam generator. [District NSR Rule; PSD SJ 89-01] Federally Enforceable Through Title V Permit
15. Maximum heat input to steam generator shall not exceed 1,440 MMBTU/day. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Sulfur compound emissions (as SO2) and PM10 emissions from the combustion of well vent vapors from S-1547-819 in this steam generator and all other devices authorized to combust such vapors shall not exceed the limits established on S-1547-819. [District Rules 2201, 4201, 3.1 and 4301, 5.1, 5.2.1 and 5.2.3] Federally Enforceable Through Title V Permit
17. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emission rates, except during startup, shutdown, and refractory curing from the combustion of natural gas, shall not exceed any of the following: PM10: 0.005 lb/MMBTU or SOx (as SO2): 0.002 lb/MMBtu. [District Rules 2201, 2520, 4201, 4301, 4406, 4801 and Kern County Rules 424] Federally Enforceable Through Title V Permit
19. Emission rates, except during startup, shutdown, and refractory curing shall not exceed any of the following: VOC: 0.003 lb/MMBtu, NOx (as NO2): 0.018 lb/MMBtu or 15 ppmv @ 3% O2, or CO: 0.030 lb/MMBtu or 40 ppmv @ 3% O2. [District Rules 2201, 2520, 4301, 4305, 4306, 4405 and Kern County Rule 425] 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.

20. 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
21. Emission rates shall not exceed any of the following: VOC: 4.3 lb/day, NO_x (as NO₂): 49.0 lb/day or 9461 lb/year, or CO: 43.2 lb/day [District Rule 2201] Federally Enforceable Through Title V Permit
22. Duration of start-up and shutdown shall not exceed 2 hours each per occurrence. [District Rule 4305 and 4306] Federally Enforceable Through Title V Permit
23. Duration of refractory curing shall not exceed 30 hours each per occurrence. Permittee shall notify the District in writing prior to refractory curing. [District Rule 2080] Federally Enforceable Through Title V Permit
24. Permittee shall maintain records of duration of each start-up and shutdown, and refractory curing, for a period of five years and make such records readily available for District inspection upon request. [District Rule 4306] Federally Enforceable Through Title V Permit
25. 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
26. 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, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
27. 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
28. 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
29. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 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.

30. 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
31. 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
32. 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
33. 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 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D4468, D3246, D3246, D4084 or double GC for H₂S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rule 1081, and 4305, 6.2] Federally Enforceable Through Title V Permit
34. 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
35. 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
36. All equipment, facilities, or systems installed or used to achieve compliance with the terms and conditions of this permit shall at all times be maintained in good working order and be operated as efficiently as possible so as to minimize air pollutant emissions. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
37. The Regional Administrator shall be notified by telephone within 48 hours following any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner which results in an increase in emissions above any allowable emissions limit stated in the conditions below. In addition, the Regional Administrator shall be notified in writing within 15 days of any such failure. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
38. This notification shall include a description of the malfunctioning equipment or abnormal operation, the date of initial failure, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed under the conditions below, and the methods utilized to restore normal operations. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
39. Facility shall operate this unit in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable federal, State and local air quality regulations. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
40. This unit shall be equipped with oxygen controls, low NO_x burner, and a flue gas recirculation system for the control of NO_x emissions. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
41. Facility shall conduct annual performance tests for NO_x and PM₁₀ and furnish the EPA a written report of the results of such tests. The tests shall be conducted at the maximum operating capacity of the unit. Upon written request from the operator, EPA may approve the conducting of performance tests at a lower specified operating capacity. Upon written request and adequate justification, EPA may waive annual testing requirements for this unit. [PSD SJ 89-01] 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.

42. Performance tests for NO_x and PM₁₀ shall be conducted and the results reported in accordance with the test methods in 40 CFR 60, Part 60.8 and Appendix A. The following test methods shall be used: NO_x - EPA methods 1 through 4 (lb/hr), and 7E (ppmv), PM₁₀ - EPA Methods 1 through 5. Equivalent test methods may be used with prior written approval from the EPA. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
43. EPA shall be notified in writing at least 30 days prior to performance tests. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
44. For performance test purposes, sampling ports, platforms, and access shall be provided by the operator at each exhaust system in accordance with 40 CFR 60.8(e). [PSD SJ 89-01] Federally Enforceable Through Title V Permit
45. Operations during periods of startup, shutdown and malfunction shall not constitute representative conditions for the purpose of a performance test. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
46. Field or casing head gas will be sweetened as required to limit the sulfur content of the fuel to 75 gr/scf. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
47. Operator shall record hours of operation and amounts and types of fuel fired each calendar quarter. All information shall be recorded in a form suitable for inspection. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
48. Emission rates shall not exceed any of the following: PM₁₀: 0.303 lb/hr, NO_x: 2.71 lb/hr or 35 ppmv dry, @ 3% O₂. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
49. Visible emissions shall not exceed ½ Ringelmann or 10% opacity. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
50. Any relaxation in the District's Determination of Compliance conditions, Authority to Construct conditions, Permit to Operate conditions, or any other subsequent permit of legally binding document that could result in an increase of the potential to emit of any pollutant from this source above the PSD applicability thresholds will require a full PSD review of the source as if construction had not yet begun. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
51. Facility shall have legal and operational responsibility and control of all air pollutant emitting activities of the MOCO TEOR project. This responsibility shall include, but not limited to: operating and maintaining the project to comply with all federal, state and local air pollution laws, regulations, permits, orders and other requirements; ensuring the emissions offsets or other reductions required for this project under permits issued by the District are obtained as required; any violation of any air pollution requirements are the legal responsibility of the facility in addition to any other legally responsible parties. Any proposed change to this condition shall require the prior written concurrence of the EPA. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
52. Facility is required to implement the conditions required by the U.S. Fish and Wildlife Service, as outlined in their Biological Opinion and Formal Consultation Response (August 30, 1990), to prevent the incidental taking (killing, harming or harassment) of endangered species that may be affected by this unit. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
53. All correspondence as required by this permit shall be forwarded to: a) Director, Air Management Division, Compliance Section (Attn: A-3-3), EPA Region IX, 75 Hawthorne Street, San Francisco, CA, 94105; b) Chief, Stationary Source Control Division, California Air Resource Board, P.O. Box 2815, Sacramento, CA, 95814; and c) Director, SJVUAPCD, 1990 East Gettysburg, Fresno, CA, 93726. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
54. Note: Formerly S-1511-138

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-797-10

EXPIRATION DATE: 05/31/2007

SECTION: SW14 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR WITH A COEN MODEL ULN BURNER AND WITH FLUE GAS RECIRCULATION (FGR) AND NON-CONDENSIBLE PIPING FROM VAPOR CONTROL SYSTEM S-1547-819 (MOCO 603) (SOUTH MIDWAY)

PERMIT UNIT REQUIREMENTS

1. 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
2. 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
3. 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
4. Sulfur emissions shall not exceed 0.11 lb of sulfur per million BTU of heat input, averaged over 3 - one hour periods. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas; multiplying the reported sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by a combination of source testing for sulfur compounds and fuel analysis. Compliance may be demonstrated for this unit individually, or by showing that the total emissions of sulfur compounds from all steam generators located at the stationary source with ATC or PTO issued prior to September 12, 1979 does not exceed the emissions that would result if each unit was operating in compliance with the specified limit. [Kern County Rule 424 and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
5. 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
6. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6; or EPA Method 6B; or EPA Method 8; or ARB Methods 8 or 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculate emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

7. If the unit is fired on noncertified gaseous fuel and compliance with SO_x emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D3246 or grab sample analysis by double GC for H₂S and mercaptans performed in the laboratory. [District Rule 2520, 9.4.2; 4305, 6.2.1, and 4351, 6.2.1] Federally Enforceable Through Title V Permit
8. 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
9. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), 110 (Madera) 402 (Madera), 404 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 405 (Madera), 408 (Fresno, Kern, Tulare, Kings, Stanislaus, Merced, and San Joaquin), 407.2 (Kern, Tulare, Kings, Stanislaus, and San Joaquin), and 408.2 (Merced). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
10. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements of SJVUAPCD Rules 4201 (Amended December 17, 1992), 4301 (Amended December 17, 1992), 4406 (Amended December 17, 1992, and Rule 4801 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
11. 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
12. This unit has not been used to produce electricity for sale in 1985 or on or after November 15, 1990. Therefore, the requirements of 40 CFR 72.6(b) do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
13. Steam generator shall be equipped with operational fuel gas and vapor recovery gas volumetric flow meters. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Only natural gas or a combination of natural gas and TEOR well vent vapors from well vent vapor control system S-1547-819 shall be used as fuel in this steam generator. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Maximum heat input to steam generator shall not exceed 1,440 MMBTU/day. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Sulfur compound emissions (as SO₂) and PM₁₀ emissions from the combustion of well vent vapors from S-1547-819 in this steam generator and all other devices authorized to combust such vapors shall not exceed the limits established on S-1547-819. [District Rules 2201, 4201, 3.1 and 4301, 5.1, 5.2.1 and 5.2.3] Federally Enforceable Through Title V Permit
17. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emission rates, except during startup, shutdown, and refractory curing shall not exceed any of the following: PM₁₀: 0.005 lb/MMBtu, SO_x (as SO₂): 0.002 lb/MMBtu, VOC: 0.003 lb/MMBtu, NO_x (as NO₂): 0.018 lb/MMBtu or 15.0 ppmv @ 3% O₂, or CO: 0.030 lb/MMBtu or 40.0 ppmv @ 3% O₂. [District Rules 2201, 2520, 4201, 4301, 4305, 4306, 4405, 4406, 4801 and Kern County Rules 424 and 425] Federally Enforceable Through Title V Permit
19. 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

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

20. Emission rates shall not exceed any of the following: VOC: 7.2 lb/day, NOx (as NO2): 49.0 lb/day or 9461 lb/year, or CO: 43.2 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Duration of start-up and shutdown shall not exceed 2 hours each per occurrence. [District Rule 4305 and 4306] Federally Enforceable Through Title V Permit
22. Duration of refractory curing shall not exceed 30 hours each per occurrence. Permittee shall notify the District in writing prior to refractory curing. [District Rule 2080] Federally Enforceable Through Title V Permit
23. Permittee shall maintain records of duration of each start-up and shutdown, and refractory curing, for a period of five years and make such records readily available for District inspection upon request. [District Rule 4306] Federally Enforceable Through Title V Permit
24. 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
25. 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, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
26. 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
27. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 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
28. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
29. Source testing to measure natural gas-combustion NOx 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
30. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

31. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
32. 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
33. 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 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D3246 or double GC for H₂S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rule 1081, and 4305, 6.2] Federally Enforceable Through Title V Permit
34. 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
35. 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
36. 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
37. Note: Formerly S-1511-166

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-819-8

EXPIRATION DATE: 05/31/2007

SECTION: 35 **TOWNSHIP:** 12N **RANGE:** 24W

EQUIPMENT DESCRIPTION:

TEOR OPERATION W/ UP TO 900 STEAM DRIVE WELLS SERVED BY WELL CASING VENT VAPOR CONTROL AND CONTROL SYSTEM

PERMIT UNIT REQUIREMENTS

1. Fugitive VOC emissions from all components associated with this operation shall not exceed 410.6 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Permittee shall maintain for a period of five years, accurate records of fugitive inspection component counts, leak screening values in excess of 10,000 ppm, and shall, as approved by the District, calculate fugitive emissions using February 1999 CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2c. Permittee shall make records of component counts, screening values, and calculations readily available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Operation shall include liquid knockout vessels (separators), heat exchangers, and vapor compressors. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Operation shall include vapor collection piping network from this well vent vapor control system, well vent vapor control system S-1547-707, and tank battery vapor control system S-1547-843 to sulfur scrubbing systems (primary & standby). [District NSR Rule] Federally Enforceable Through Title V Permit
5. Permittee shall maintain a current roster of wells connected to the casing collection system, and such roster shall be made readily available for District inspection upon request [District NSR Rule] Federally Enforceable Through Title V Permit
6. Primary sulfur scrubbing system shall include casing gas coolers and pumps, contactor vessels and separators, regenerator section with heat exchangers, recirculation pump & air blower, and chemical storage tanks. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Standby sulfur scrubbing system shall include contactor vessels and separators. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Sulfur scrubbing system(s) shall use District approved scrubbing agents including, Exxon Sulfa Check, DOW Sulferox, WESCHEM Sulfarid, SulfaScrub, and Betz DX-1026 Formulations. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Prior District approval shall be obtained for using alternative sulfur scrubbing agents other than those listed above. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Casing vapor collection system shall be equipped with vapor flow rate indicator/recorder downstream of condensation and sulfur removal equipment measuring total non-condensable vapor flow rate. [District NSR Rule] Federally Enforceable Through Title V Permit
11. All wells approved by this permit shall have the well head casing vents routed to the TEOR well vent vapor control system. [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.

12. Well casing vents may be closed provided produced fluids are handled only in production facilities with District-approved emission control systems achieving at least 99% control. [District NSR Rule and District Rule 4401] Federally Enforceable Through Title V Permit
13. An inspection and maintenance program consistent with Rule 4403 for light oil production facilities shall be implemented for stuffing boxes and polish rods of 479 newly authorized steam drive wells (identified by well roster). [District NSR Rule] Federally Enforceable Through Title V Permit
14. Sulfur bin ventilation (if applicable) shall be vented to one or more of the District approved steam generators connected to desulfurized casing gas piping network. [District NSR Rule] Federally Enforceable Through Title V Permit
15. During temporary periods of maintenance covered in the permittee's bi-annual maintenance plan the permittee may conduct maintenance or repair activities contained in the District approved bi-annual maintenance plan without shutting-in production from wells served by the well vent vapor collection system, for no more than a total of 336 hours during any one calendar year for each system. Maintenance covered by the permittee's bi-annual maintenance plan may exceed 336 hours during any one calendar year when maintenance is performed while all casing well vents covered by this permit are closed. When multiple vapor recovery systems serve the same wells in series or in parallel, a total of 336 hours of maintenance shall be allowed for all systems combined. [District NSR Rule] Federally Enforceable Through Title V Permit
16. During temporary periods of maintenance covered in the permittee's bi-annual maintenance plan, well vent vapor recovery piping may be temporarily shut-in or isolated for routine maintenance or repair activities without closing the well vents normally served by a well vent vapor collection system provided that well vent vapors are routed to a vapor recovery system that complies with District rule 4401 and all otherwise applicable provisions of this permit. [District NSR Rule and District Rule 4401] Federally Enforceable Through Title V Permit
17. Well vent vapor collection system piping and components shall be maintained as required by Rule 4401, and well vent vapors shall not be vented or bled-off to the atmosphere except for those actions necessary to safely isolate vessels and piping for routine maintenance. [District NSR Rule and District Rule 4401] Federally Enforceable Through Title V Permit
18. The District shall be notified at least 48 hours prior to the start of each maintenance program. No later than 10 days after completing each maintenance episode, the permittee shall notify the District in writing of the date, time, duration, well number(s), and description of the maintenance or repair activity completed. [District NSR Rule] Federally Enforceable Through Title V Permit
19. Permittee shall maintain records of the date, time, and duration of each maintenance or repair episode requiring the temporary isolation of well vent vapor recovery piping. Such records shall include well identification numbers and a description of the maintenance or repair activity completed, and shall be maintained for a period of up to 5 years, and be made readily available to the District upon request. [District NSR Rule and District Rule 1070] Federally Enforceable Through Title V Permit
20. Permittee shall submit to the District bi-annual maintenance plans. The maintenance plan must identify each permit unit and illustrate them on a detailed map of the system, identify the period and duration of each maintenance episode for each system, an estimate of VOC emissions released during maintenance, and the procedures that will be used to maintain and isolate affected equipment. [District NSR Rule] Federally Enforceable Through Title V Permit
21. If unscrubbed sulfur rate exceeds 109.2 lb S/day, non-condensable gas shall be scrubbed by sulfur scrubbing systems prior to incineration in steam generators S-1547-766 to '-772, '-777 to '-781, or other District approved steam generators. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Liquid condensate from vapor recovery piping, condensation, and sulfur scrubbing systems shall be pumped to production manifold. [District NSR Rule] Federally Enforceable Through Title V Permit
23. Non-condensable gas from vapor control system shall not be vented to atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
24. Maximum gas flow rate from well casing vent vapor control system shall not exceed 4.09 MMscf/day. [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.

25. Total mass flow rate of sulfur compounds from sulfur scrubbing systems shall not exceed 258.0 lb/day as S. [District NSR Rule] Federally Enforceable Through Title V Permit
26. Permittee shall maintain accurate daily records of gas flowrate leaving sulfur scrubbing systems, and sulfur content (by daily gas sampling) of non-condensable gas entering and leaving sulfur scrubbing systems. [District NSR Rule] Federally Enforceable Through Title V Permit
27. If sulfur scrubbing systems are not utilized, permittee shall maintain accurate daily records of total unscrubbed sulfur mass flow rate and sulfur content (by daily gas sampling) of unscrubbed non-condensable gas. [District NSR Rule] Federally Enforceable Through Title V Permit
28. Particulate matter (as PM10) emissions from TEOR gas incineration shall not exceed 55.9 lb/day (shared with all District approved steam generators). [District NSR Rule] Federally Enforceable Through Title V Permit
29. A leak shall be defined as a reading on a portable hydrocarbon detection instrument (calibrated with methane) in excess on 10,000 ppmv when measured in accordance with EPA Method 21 . [District Rule 4401, 3.4] Federally Enforceable Through Title V Permit
30. The crude oil production from wells associated with this permit unit shall not produce from the same production zone in which an air injection well is completed and shall not lie within 1000 feet of an air injection well used for in-situ combustion. [District Rule 4407, 2.0, 3.4, and 3.5] Federally Enforceable Through Title V Permit
31. During the time any steam-enhanced crude oil production well is undergoing service or repair while the well is not producing, it shall be exempt from the emission control requirements of District Rule 4401, 5.0 (as amended December 17, 1992). [District Rule 4401, 4.1] Federally Enforceable Through Title V Permit
32. All required source testing shall conform to the compliance testing procedures described in District Rule 1081(as 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
33. The operator shall maintain monitoring records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401, 6.1] Federally Enforceable Through Title V Permit
34. 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
35. The uncontrolled VOC emissions from any well vent shall be reduced by at least 99 percent by weight or, if several steam-enhanced crude oil production well vents are connected to a vapor collection and control system, total uncontrolled VOC emissions shall be reduced by at least 99 percent. This requirement does not apply to cyclic wells located on contiguous and adjacent oil production properties with less than 10 cyclic wells owned by or under the control of a company. [District Rule 4401, 5.1 and 5.2] Federally Enforceable Through Title V Permit
36. For cyclic wells located on properties with less than 10 cyclic wells and owned by a company, the uncontrolled VOC emissions from any well vent or system of well vents connected to a single control device shall be reduced by at least 50 percent. Properties shall include contiguous and adjacent oil production properties owned by or under control of the company. [District Rule 4401, 5.4] Federally Enforceable Through Title V Permit
37. Total number of leaks from the vapor collection and control system, including condensate handling, shall not exceed the number as allowed by Rule 4401 (as amended December 14, 2006) at any one time. [District Rule 4401, 5.3] Federally Enforceable Through Title V Permit
38. Units consisting of more than 500 wells shall not exceed one leak detected for each 20 wells tested with a minimum of 50 wells tested. [District Rule 4401, 5.3] Federally Enforceable Through Title V Permit
39. Operator shall affix a readily visible tag bearing the date on which a leak is detected. The tag shall remain in place until the leaking component is repaired. [District Rule 4401, 5.3.1] Federally Enforceable Through Title V Permit
40. Operator shall repair each leak within 15 days of detection. The APCO may grant a 10 day extension if the operator demonstrates that the necessary and sufficient actions have and are being taken to correct the leak. [District Rule 4401, 5.3.1] 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.

41. Operator shall maintain all components of a well vent vapor collection and control system in good repair. Components of the well vent vapor collection and control system shall include all piping, valves, fittings, pumps, compressors, tanks, etc. used to collect, control, store, or dispose of VOC condensate or non-condensable VOCs and which is prior to any blending of VOC condensate with crude oil or blending of non-condensable VOCs with gases to be used as a fuel. [District Rule 4401, 5.3 and 5.3.2] Federally Enforceable Through Title V Permit
42. Annual control efficiency compliance tests shall be performed on all vapor collection and control systems used to control emissions from steam-enhanced crude oil production wells. Testing shall be performed by ARB certified contractors during June, July, August or September of each year if the system's control efficiency is dependent upon ambient air temperature. The APCO may waive the requirements of this condition if the vapor control system does not exhaust to atmosphere or if all uncondensed VOC emissions collected by a vapor collection and control system are burned in fuel burning equipment or in a smokeless open flare and the source's Operating Permit contains adequate periodic monitoring to ensure the source meets 99% control efficiency. [District Rule 4401, 5.1, 5.2 and 6.2.1] Federally Enforceable Through Title V Permit
43. The control efficiency of systems designed to control VOC emissions from steam enhanced crude oil production well shall be determined by mass balance based on recognized emission factors for components and number of components; and the efficiency of destruction devices determined by EPA Method 25, 25a, or 25b as applicable. [District Rule 4401, 6.3.1] Federally Enforceable Through Title V Permit
44. VOC content shall be determined using ASTM Method E168, E169, or E260 as applicable. Halogenated exempt compounds shall be determined by ARB Method 422. [District Rule 4401, 6.3.2] Federally Enforceable Through Title V Permit
45. The source shall perform leak inspections at least annually, using a portable hydrocarbon detection instrument in accordance with EPA Method 21. Where safety is a concern, such as measuring leaks from a compressor seals or pump seals when the shaft is rotating, a person shall measure leaks by placing the instrument probe inlet a distance of one centimeter or less from the surface of the component interface. [District Rules 2520, 9.4.2 and 4401, 6.3.3] Federally Enforceable Through Title V Permit
46. Compliance with permit conditions in the Title V permit shall be deemed compliance with SJVUAPCD Rule 4401 (Amended December 17, 1992), formerly District Rule 465.1, excluding sections 5.1 and 5.2 for control systems which have been waived from complying with the requirement of section 6.2.1. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
47. The requirements of SJVUAPCD Rule 4407 (Adopted May 19, 1994) do not apply to this permit unit. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
48. Note: Formerly S-1511-213

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

Appendix B
TVFORM-009

Appendix C
Draft ATCs

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: S-1547-766-16

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: NW35 TOWNSHIP: 12N RANGE: 24W

EQUIPMENT DESCRIPTION:

MODIFICATION OF 62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN LOW NOX BURNER WITH FLUE GAS RECIRCULATION (FGR) AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819. (MOCO #604) (SOUTH MIDWAY): 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; LOWER NOX LIMIT TO 7 PPMV @ 3% O2 AND LIMIT FUEL SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

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. {1831} 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] 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-1547-766-16 : Apr 19 2010 2:36PM - RICKARDK : Joint Inspection NOT Required

5. The permittee's request for approval of equivalent equipment shall include the make, model, manufacturer's maximum rating, manufacturer's guaranteed emissions rates, equipment drawing(s) and operational characteristics/parameters [District Rule 2010] Federally Enforceable Through Title V Permit
6. 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
7. {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
8. 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
9. 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, 4306, 4320, and 4351, 6.2.1] Federally Enforceable Through Title V Permit
10. {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
11. Steam generator shall be equipped with operational fuel gas and vapor recovery gas volumetric flow meters. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Only natural gas or a combination of natural gas and TEOR well vent vapors from well vent vapor control system S-1547-819 shall be used as fuel in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
13. When combusting a combination of natural gas and vapor recovery gas, the fuel gas sulfur content shall not exceed 5 grains of total sulfur (as H₂S) per 100 dscf of fuel gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
14. Maximum heat input to steam generator shall not exceed 1,440 MMBTU/day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Total TEOR gas from permit S-1547-819 incinerated in steam generators S-1547-766 to '-772, '-777 to '-781, and '-797 shall not exceed 4.09 MMscf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Permittee shall maintain accurate daily records of gas flowrate delivered to steam generators S-1547-766 to '-772, '-777 to '-781, and '-797. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Total PM₁₀ emissions for steam generators S-1547-766 to '-772, '-777 to '-781, and '-797 shall not exceed 129.1 lb/day nor 47,122 lb/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Emission rates, except during startup, shutdown, and refractory curing from the combustion of natural gas, shall not exceed any of the following: PM₁₀: 0.005 lb/MMBTU or SO_x (as SO₂): 0.002 lb/MMBtu. [District Rules 2201, 2520, 4201, 4301, 4406, 4801 and Kern County Rules 424] Federally Enforceable Through Title V Permit
20. 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): 0.008 lb/MMBtu or 7 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

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CONDITIONS CONTINUE ON NEXT PAGE

21. 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
22. Emission rates shall not exceed any of the following: VOC: 4.3 lb/day, NO_x (as NO₂): 49.0 lb/day or 4205 lb/year, or CO: 43.2 lb/day [District Rule 2201] Federally Enforceable Through Title V Permit
23. During a "shakedown" period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO_x emission shall not exceed 15 ppmvd NO_x @ 3% O₂ or 0.018 lb-NO_x/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline selected for this unit. Permittee shall maintain a record of the date of initial operation for at least 5 years. [District Rule 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
24. 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
25. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
26. 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, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. 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
28. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
29. 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. 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

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CONDITIONS CONTINUE ON NEXT PAGE

30. 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
31. 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
32. Source testing to measure natural gas-combustion NO_x and CO emissions from this unit shall be conducted within 60 days of initial operation under this ATC. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
33. 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
34. 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 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D4468, D3246, D3246, D4084 or double GC for H₂S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rule 1081, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
35. 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
36. Operator shall provide an annual fuel sulfur content analysis to the District upon request. [District Rule 4320]
37. 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
38. Formerly S-1511-123

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: S-1547-766-17

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: NW35 TOWNSHIP: 12N RANGE: 24W

EQUIPMENT DESCRIPTION:

MODIFICATION OF 62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN LOW NOX BURNER WITH FLUE GAS RECIRCULATION (FGR) AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819. (MOCO #604) (SOUTH MIDWAY): 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; LOWER NOX LIMIT TO 9 PPMV @ 3% O2 AND LIMIT FUEL SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

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. {1831} 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] 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-1547-766-17: Apr 16 2010 2:37PM - RICKARDX : Joint Inspection NOT Required

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] Federally Enforceable Through Title V Permit
5. The permittee's request for approval of equivalent equipment shall include the make, model, manufacturer's maximum rating, manufacturer's guaranteed emissions rates, equipment drawing(s) and operational characteristics/parameters [District Rule 2010] Federally Enforceable Through Title V Permit
6. 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
7. {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
8. 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
9. 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, 4306, 4320, and 4351, 6.2.1] Federally Enforceable Through Title V Permit
10. {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
11. Steam generator shall be equipped with operational fuel gas and vapor recovery gas volumetric flow meters. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Only natural gas or a combination of natural gas and TEOR well vent vapors from well vent vapor control system S-1547-819 shall be used as fuel in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
13. When combusting a combination of natural gas and vapor recovery gas, the fuel gas sulfur content shall not exceed 5 grains of total sulfur (as H₂S) per 100 dscf of fuel gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
14. Maximum heat input to steam generator shall not exceed 1,440 MMBTU/day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Total TEOR gas from permit S-1547-819 incinerated in steam generators S-1547-766 to '-772, '-777 to '-781, and '-797 shall not exceed 4.09 MMscf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Permittee shall maintain accurate daily records of gas flowrate delivered to steam generators S-1547-766 to '-772, '-777 to '-781, and '-797. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Total PM₁₀ emissions for steam generators S-1547-766 to '-772, '-777 to '-781, and '-797 shall not exceed 129.1 lb/day nor 47,122 lb/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Emission rates, except during startup, shutdown, and refractory curing from the combustion of natural gas, shall not exceed any of the following: PM₁₀: 0.005 lb/MMBTU or SO_x (as SO₂): 0.002 lb/MMBtu. [District Rules 2201, 2520, 4201, 4301, 4406, 4801 and Kern County Rules 424] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

20. 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 Rules 2201, 2520, 4301, 4305, 4306, 4320, 4405 and Kern County Rule 425] Federally Enforceable Through Title V Permit
21. 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
22. Emission rates shall not exceed any of the following: VOC: 4.3 lb/day, NOx (as NO₂): 49.0 lb/day or 5782 lb/year, or CO: 43.2 lb/day [District Rule 2201] Federally Enforceable Through Title V Permit
23. During a "shakedown" period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NOx emission shall not exceed 15 ppmvd NOx @ 3% O₂ or 0.018 lb-NOx/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline selected for this unit. Permittee shall maintain a record of the date of initial operation for at least 5 years. [District Rule 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
24. 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
25. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
26. 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, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. 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
28. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NOx and CO concentrations corrected to 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, 4306, and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

29. 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. 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
30. Source testing to measure natural gas-combustion NOx 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
31. 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
32. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted within 60 days of initial operation under this ATC. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
33. 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
34. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (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, SOx (lb/MMBtu) - ARB Method 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D4468, D3246, D3246, D4084 or double GC for H2S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rule 1081, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
35. 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
36. Operator shall provide an annual fuel sulfur content analysis to the District upon request. [District Rule 4320]
37. 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
38. Formerly S-1511-123

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-1547-766-18

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: NW35 **TOWNSHIP:** 12N **RANGE:** 24W

EQUIPMENT DESCRIPTION:

MODIFICATION OF 62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN LOW NOX BURNER WITH FLUE GAS RECIRCULATION (FGR) AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819. (MOCO #604) (SOUTH MIDWAY): LIMIT FUEL SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

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. {1831} 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. 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
4. {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

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-6500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director APCO

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DAVID WARNER, Director of Permit Services
S-1547-766-18 : Apr 18 2010 2:37PM - RICKARDK : Joint Inspection NOT Required

5. 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
6. 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, 4306, 4320, and 4351, 6.2.1] Federally Enforceable Through Title V Permit
7. {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
8. Steam generator shall be equipped with operational fuel gas and vapor recovery gas volumetric flow meters. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Only natural gas or a combination of natural gas and TEOR well vent vapors from well vent vapor control system S-1547-819 shall be used as fuel in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
10. When combusting a combination of natural gas and vapor recovery gas, the fuel gas sulfur content shall not exceed 5 grains of total sulfur (as H₂S) per 100 dscf of fuel gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
11. Maximum heat input to steam generator shall not exceed 1,440 MMBTU/day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total TEOR gas from permit S-1547-819 incinerated in steam generators S-1547-766 to '-772, '-777 to '-781, and '-797 shall not exceed 4.09 MMscf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Permittee shall maintain accurate daily records of gas flowrate delivered to steam generators S-1547-766 to '-772, '-777 to '-781, and '-797. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Total PM₁₀ emissions for steam generators S-1547-766 to '-772, '-777 to '-781, and '-797 shall not exceed 129.1 lb/day nor 47,122 lb/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Emission rates, except during startup, shutdown, and refractory curing from the combustion of natural gas, shall not exceed any of the following: PM₁₀: 0.005 lb/MMBTU or SO_x (as SO₂): 0.002 lb/MMBtu. [District Rules 2201, 2520, 4201, 4301, 4406, 4801 and Kern County Rules 424] Federally Enforceable Through Title V Permit
17. 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): 0.018 lb/MMBtu or 15 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
18. 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
19. Emission rates shall not exceed any of the following: VOC: 4.3 lb/day, NO_x (as NO₂): 49.0 lb/day or 9,461 lb/year, or CO: 43.2 lb/day [District Rule 2201] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

20. 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
21. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
22. 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, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
23. 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
24. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
25. 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. 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
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 108] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D4468, D3246, D3246, D4084 or double GC for H₂S and mercaptans performed in laboratory, fuel gas hhv - ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rule 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. Operator shall provide an annual fuel sulfur content analysis to the District upon request. [District Rule 4320]
32. 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
33. Formerly S-1511-123

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-1547-767-16

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: NW35 **TOWNSHIP:** 12N **RANGE:** 24W

EQUIPMENT DESCRIPTION:

MODIFICATION OF 62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR WITH COEN QLN-ULN BURNER AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819 (MOCO #605) (SOUTH MIDWAY): 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; LOWER NOX LIMIT TO 7 PPMV @ 3% O2 AND LIMIT FUEL SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

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. {1831} 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] Federally Enforceable Through Title V Permit
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] 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-1547-767-16 : Apr 16 2010 2:37PM - RICKARDX : Joint Inspection NOT Required

5. The permittee's request for approval of equivalent equipment shall include the make, model, manufacturer's maximum rating, manufacturer's guaranteed emissions rates, equipment drawing(s) and operational characteristics/parameters [District Rule 2010] Federally Enforceable Through Title V Permit
6. 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
7. {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
8. 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
9. 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, 4306, 4320, and 4351, 6.2.1] Federally Enforceable Through Title V Permit
10. The operator shall demonstrate compliance with this unit's sulfur compound exhaust concentration limit(s) using one of the following: fire the unit only on PUC or FERC regulated natural gas, 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
11. {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
12. Steam generator shall be equipped with operational fuel gas and vapor recovery gas volumetric flow meters. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Only natural gas or a combination of natural gas and TEOR well vent vapors from well vent vapor control system S-1547-819 shall be used as fuel in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
14. When combusting a combination of natural gas and vapor recovery gas, the fuel gas sulfur content shall not exceed 5 grains of total sulfur (as H₂S) per 100 dscf of fuel gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
15. Maximum heat input to steam generator shall not exceed 1,440 MMBTU/day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Total TEOR gas from permit S-1547-819 incinerated in steam generators S-1547-766 to '-772, '-777 to '-781, and '-797 shall not exceed 4.09 MMscf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Permittee shall maintain accurate daily records of gas flowrate delivered to steam generators S-1547-766 to '-772, '-777 to '-781, and '-797. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Total PM₁₀ emissions for steam generators S-1547-766 to '-772, '-777 to '-781, and '-797 shall not exceed 129.1 lb/day nor 47,122 lb/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Emission rates, except during startup, shutdown, and refractory curing from the combustion of natural gas, shall not exceed any of the following: PM₁₀: 0.005 lb/MMBTU or SO_x (as SO₂): 0.002 lb/MMBtu. [District NSR Rule and District Rules 2520, 4201, 4301, 4406, 4801 and Kern County Rule 424] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

21. 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): 0.008 lb/MMBtu or 7 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
22. 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
23. Emission rates shall not exceed any of the following: VOC: 4.3 lb/day, NO_x (as NO₂): 49.0 lb/day or 4205 lb/year, or CO: 43.2 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
24. During a "shakedown" period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO_x emission shall not exceed 15 ppmvd NO_x @ 3% O₂ or 0.018 lb-NO_x/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline selected for this unit. Permittee shall maintain a record of the date of initial operation for at least 5 years. [District Rule 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
25. 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
26. 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 District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. 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, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
28. 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 District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
29. 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, 4306, and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

30. 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
31. Source testing to measure natural gas-combustion NOx 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
32. Source testing to measure NOx and CO emissions from this unit shall be conducted within 60 days of initial operation under this ATC. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
33. 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
34. 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
35. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (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, SOx (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
36. 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
37. Operator shall provide an annual fuel sulfur content analysis to the District upon request. [District Rule 4320]
38. 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
39. Formerly S-1511-124

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
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PERMIT NO: S-1547-767-17

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: NW35 TOWNSHIP: 12N RANGE: 24W

EQUIPMENT DESCRIPTION:

MODIFICATION OF 62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR WITH COEN QLN-ULN BURNER AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819 (MOCO #605) (SOUTH MIDWAY); 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; LOWER NOX LIMIT TO 9 PPMV @ 3% O2 AND LIMIT FUEL SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

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. {1831} 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] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director, APCO

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DAVID WARNER, Director of Permit Services
S-1547-767-17 : Apr 18 2010 2:37PM - RICKARDK : Joint Inspection NOT Required

5. The permittee's request for approval of equivalent equipment shall include the make, model, manufacturer's maximum rating, manufacturer's guaranteed emissions rates, equipment drawing(s) and operational characteristics/parameters [District Rule 2010] Federally Enforceable Through Title V Permit
6. 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
7. {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
8. 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
9. 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, 4306, 4320, and 4351, 6.2.1] Federally Enforceable Through Title V Permit
10. The operator shall demonstrate compliance with this unit's sulfur compound exhaust concentration limit(s) using one of the following: fire the unit only on PUC or FERC regulated natural gas, 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
11. {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
12. Steam generator shall be equipped with operational fuel gas and vapor recovery gas volumetric flow meters. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Only natural gas or a combination of natural gas and TEOR well vent vapors from well vent vapor control system S-1547-819 shall be used as fuel in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
14. When combusting a combination of natural gas and vapor recovery gas, the fuel gas sulfur content shall not exceed 5 grains of total sulfur (as H₂S) per 100 dscf of fuel gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
15. Maximum heat input to steam generator shall not exceed 1,440 MMBTU/day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Total TEOR gas from permit S-1547-819 incinerated in steam generators S-1547-766 to '-772, '-777 to '-781, and '-797 shall not exceed 4.09 MMscf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Permittee shall maintain accurate daily records of gas flowrate delivered to steam generators S-1547-766 to '-772, '-777 to '-781, and '-797. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Total PM₁₀ emissions for steam generators S-1547-766 to '-772, '-777 to '-781, and '-797 shall not exceed 129.1 lb/day nor 47,122 lb/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Emission rates, except during startup, shutdown, and refractory curing from the combustion of natural gas, shall not exceed any of the following: PM₁₀: 0.005 lb/MMBTU or SO_x (as SO₂): 0.002 lb/MMBtu. [District Rules 2201, 2520, 4201, 4301, 4406, 4801 and Kern County Rule 424] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

21. 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 Rules 2201, 2520, 4301, 4305, 4306, 4320, 4405 and Kern County Rule 425] Federally Enforceable Through Title V Permit
22. 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
23. Emission rates shall not exceed any of the following: VOC: 4.3 lb/day, NOx (as NO₂): 49.0 lb/day or 5782 lb/year, or CO: 43.2 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
24. During a "shakedown" period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NOx emission shall not exceed 15 ppmvd NOX @ 3% O₂ or 0.018 lb-NOX/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline selected for this unit. Permittee shall maintain a record of the date of initial operation for at least 5 years. [District Rule 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
25. 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
26. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
27. 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, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
28. 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
29. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NOx and CO concentrations corrected to 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, 4306, and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

30. 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
31. Source testing to measure natural gas-combustion NOx 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
32. Source testing to measure NOx and CO emissions from this unit shall be conducted within 60 days of initial operation under this ATC. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
33. 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
34. 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
35. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (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, SOx (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
36. 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
37. Operator shall provide an annual fuel sulfur content analysis to the District upon request. [District Rule 4320]
38. 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
39. Formerly S-1511-124

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-1547-767-18

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: NW35 **TOWNSHIP:** 12N **RANGE:** 24W

EQUIPMENT DESCRIPTION:

MODIFICATION OF 62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR WITH COEN QLN-ULN BURNER AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819 (MOCO #605) (SOUTH MIDWAY): LIMIT FUEL SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

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. {1831} 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. 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
4. {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

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director APCO

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DAVID WARNER, Director of Permit Services
S-1547-767-18 : Apr 16 2010 2:37PM - RICKARDK : Joint Inspection NOT Required

5. 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
6. 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, 4306, 4320; and 4351, 6.2.1] Federally Enforceable Through Title V Permit
7. The operator shall demonstrate compliance with this unit's sulfur compound exhaust concentration limit(s) using one of the following: fire the unit only on PUC or FERC regulated natural gas, 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
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
9. Steam generator shall be equipped with operational fuel gas and vapor recovery gas volumetric flow meters. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Only natural gas or a combination of natural gas and TEOR well vent vapors from well vent vapor control system S-1547-819 shall be used as fuel in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
11. When combusting a combination of natural gas and vapor recovery gas, the fuel gas sulfur content shall not exceed 5 grains of total sulfur (as H₂S) per 100 dscf of fuel gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
12. Maximum heat input to steam generator shall not exceed 1,440 MMBTU/day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Total TEOR gas from permit S-1547-819 incinerated in steam generators S-1547-766 to '-772, '-777 to '-781, and '-797 shall not exceed 4.09 MMscf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Permittee shall maintain accurate daily records of gas flowrate delivered to steam generators S-1547-766 to '-772, '-777 to '-781, and '-797. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Total PM10 emissions for steam generators S-1547-766 to '-772, '-777 to '-781, and '-797 shall not exceed 129.1 lb/day nor 47,122 lb/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Emission rates, except during startup, shutdown, and refractory curing from the combustion of natural gas, shall not exceed any of the following: PM10: 0.005 lb/MMBTU or SO_x (as SO₂): 0.002 lb/MMBtu. [District Rules 2201, 2520, 4201, 4301, 4406, 4801 and Kern County Rule 424] Federally Enforceable Through Title V Permit
18. 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): 0.018 lb/MMBtu or 15 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
19. 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

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CONDITIONS CONTINUE ON NEXT PAGE

20. Emission rates shall not exceed any of the following: VOC: 4.3 lb/day, NO_x (as NO₂): 49.0 lb/day or 9,461 lb/year, or CO: 43.2 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
21. 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
22. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
23. 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, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
24. 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
25. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
26. 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
27. 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
28. 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

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CONDITIONS CONTINUE ON NEXT PAGE

29. 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
30. 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
31. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
32. Operator shall provide an annual fuel sulfur content analysis to the District upon request. [District Rule 4320]
33. 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
34. Formerly S-1511-124

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-1547-768-17

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: NW35 **TOWNSHIP:** 12N **RANGE:** 24W

EQUIPMENT DESCRIPTION:

MODIFICATION OF 62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS-FIRED STEAM GENERATOR, WITH COEN QLN-ULN BURNER, FLUE GAS RECIRCULATION AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819. (MOCO #606) (SOUTH MIDWAY): 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; LOWER NOX LIMIT TO 7 PPMV @ 3% O2 AND LIMIT FUEL SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

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. {1831} 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] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director, APCO

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DAVID WARNER, Director of Permit Services
S-1547-768-17 : Apr 16 2010 2:37PM - RICKARDK : Joint Inspection NOT Required

5. The permittee's request for approval of equivalent equipment shall include the make, model, manufacturer's maximum rating, manufacturer's guaranteed emissions rates, equipment drawing(s) and operational characteristics/parameters [District Rule 2010] Federally Enforceable Through Title V Permit
6. 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
7. {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
8. 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
9. 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, 4306, 4320, and 4351, 6.2.1] Federally Enforceable Through Title V Permit
10. The operator shall demonstrate compliance with this unit's sulfur compound exhaust concentration limit(s) using one of the following: fire the unit only on PUC or FERC regulated natural gas, 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
11. {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
12. Steam generator shall be equipped with operational fuel gas and vapor recovery gas volumetric flow meters. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Only natural gas or a combination of natural gas and TEOR well vent vapors from well vent vapor control system S-1547-819 shall be used as fuel in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
14. When combusting a combination of natural gas and vapor recovery gas, the fuel gas sulfur content shall not exceed 5 grains of total sulfur (as H₂S) per 100 dscf of fuel gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
15. Maximum heat input to steam generator shall not exceed 1,440 MMBTU/day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Total TEOR gas from permit S-1547-819 incinerated in steam generators S-1547-766 to '-772, '-777 to '-781, and '-797 shall not exceed 4.09 MMscf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Permittee shall maintain accurate daily records of gas flowrate delivered to steam generators S-1547-766 to '-772, '-777 to '-781, and '-797. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Total PM₁₀ emissions for steam generators S-1547-766 to '-772, '-777 to '-781, and '-797 shall not exceed 129.1 lb/day nor 47,122 lb/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Emission rates, except during startup, shutdown, and refractory curing from the combustion of natural gas, shall not exceed any of the following: PM₁₀: 0.005 lb/MMBtu or SO_x (as SO₂): 0.002 lb/MMBtu. [District Rules 2201, 2520, 4201, 4301, 4406, 4801 and Kern County Rules 420] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

21. 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): 0.008 lb/MMBtu or 7 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
22. 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
23. Emission rates shall not exceed any of the following: VOC: 4.3 lb/day, NO_x (as NO₂): 49.0 lb/day or 4205 lb/year, or CO: 43.2 lb/day [District Rule 2201] Federally Enforceable Through Title V Permit
24. During a "shakedown" period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO_x emission shall not exceed 15 ppmvd NO_x @ 3% O₂ or 0.018 lb-NO_x/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline selected for this unit. Permittee shall maintain a record of the date of initial operation for at least 5 years. [District Rule 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
25. 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
26. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
27. If 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, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
28. 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
29. 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, 4306, and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

30. 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
31. Source testing to measure natural gas-combustion NOx 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
32. Source testing to measure NOx and CO emissions from this unit shall be conducted within 60 days of initial operation under this ATC. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
33. 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
34. 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
35. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (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, SOx (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
36. 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
37. Operator shall provide an annual fuel sulfur content analysis to the District upon request. [District Rule 4320]
38. 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
39. Formerly S-1511-125

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-1547-768-18

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: NW35 **TOWNSHIP:** 12N **RANGE:** 24W

EQUIPMENT DESCRIPTION:

MODIFICATION OF 62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS-FIRED STEAM GENERATOR, WITH COEN QLN-ULN BURNER, FLUE GAS RECIRCULATION AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819. (MOCO #606) (SOUTH MIDWAY); 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; LOWER NOX LIMIT TO 9 PMV @ 3% O2 AND LIMIT FUEL SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

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. {1831} 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] Federally Enforceable Through Title V Permit
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] 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-1547-768-18 : Apr 16 2010 2:38PM - RICKARDK : Joint Inspection NOT Required

5. The permittee's request for approval of equivalent equipment shall include the make, model, manufacturer's maximum rating, manufacturer's guaranteed emissions rates, equipment drawing(s) and operational characteristics/parameters [District Rule 2010] Federally Enforceable Through Title V Permit
6. 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
7. {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
8. 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
9. 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, 4306, 4320, and 4351, 6.2.1] Federally Enforceable Through Title V Permit
10. The operator shall demonstrate compliance with this unit's sulfur compound exhaust concentration limit(s) using one of the following: fire the unit only on PUC or FERC regulated natural gas, 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
11. {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
12. Steam generator shall be equipped with operational fuel gas and vapor recovery gas volumetric flow meters. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Only natural gas or a combination of natural gas and TEOR well vent vapors from well vent vapor control system S-1547-819 shall be used as fuel in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
14. When combusting a combination of natural gas and vapor recovery gas, the fuel gas sulfur content shall not exceed 5 grains of total sulfur (as H₂S) per 100 dscf of fuel gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
15. Maximum heat input to steam generator shall not exceed 1,440 MMBTU/day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Total TEOR gas from permit S-1547-819 incinerated in steam generators S-1547-766 to '-772, '-777 to '-781, and '-797 shall not exceed 4.09 MMscf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Permittee shall maintain accurate daily records of gas flowrate delivered to steam generators S-1547-766 to '-772, '-777 to '-781, and '-797. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Total PM₁₀ emissions for steam generators S-1547-766 to '-772, '-777 to '-781, and '-797 shall not exceed 129.1 lb/day nor 47,122 lb/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Emission rates, except during startup, shutdown, and refractory curing from the combustion of natural gas, shall not exceed any of the following: PM₁₀: 0.005 lb/MMBtu or SO_x (as SO₂): 0.002 lb/MMBtu. [District Rules 2201, 2520, 4201, 4301, 4406, 4801 and Kern County Rules 429] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

21. 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
22. 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
23. Emission rates shall not exceed any of the following: VOC: 4.3 lb/day, NO_x (as NO₂): 49.0 lb/day or 5782 lb/year, or CO: 43.2 lb/day [District Rule 2201] Federally Enforceable Through Title V Permit
24. During a "shakedown" period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO_x emission shall not exceed 15 ppmvd NO_x @ 3% O₂ or 0.018 lb-NO_x/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline selected for this unit. Permittee shall maintain a record of the date of initial operation for at least 5 years. [District Rule 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
25. 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
26. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
27. If 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, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
28. 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
29. 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. [4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

30. 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
31. Source testing to measure natural gas-combustion NOx 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
32. Source testing to measure NOx and CO emissions from this unit shall be conducted within 60 days of initial operation under this ATC. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
33. 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
34. 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
35. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (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, SOx (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
36. 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
37. Operator shall provide an annual fuel sulfur content analysis to the District upon request. [District Rule 4320]
38. 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
39. Formerly S-1511-125

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-1547-768-19

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: NW35 **TOWNSHIP:** 12N **RANGE:** 24W

EQUIPMENT DESCRIPTION:

MODIFICATION OF 62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS-FIRED STEAM GENERATOR, WITH COEN QLN-ULN BURNER, FLUE GAS RECIRCULATION AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819. (MOCO #606) (SOUTH MIDWAY): LIMIT FUEL SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

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. {183} 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. 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
4. {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

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-1547-768-19 : Apr 18 2010 2:38PM - RICKARDK : Joint Inspection NOT Required

5. 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
6. 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, 4306, 4320, and 4351, 6.2.1] Federally Enforceable Through Title V Permit
7. The operator shall demonstrate compliance with this unit's sulfur compound exhaust concentration limit(s) using one of the following: fire the unit only on PUC or FERC regulated natural gas, 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
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
9. Steam generator shall be equipped with operational fuel gas and vapor recovery gas volumetric flow meters. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Only natural gas or a combination of natural gas and TEOR well vent vapors from well vent vapor control system S-1547-819 shall be used as fuel in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
11. When combusting a combination of natural gas and vapor recovery gas, the fuel gas sulfur content shall not exceed 5 grains of total sulfur (as H₂S) per 100 dscf of fuel gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
12. Maximum heat input to steam generator shall not exceed 1,440 MMBTU/day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Total TEOR gas from permit S-1547-819 incinerated in steam generators S-1547-766 to '-772, '-777 to '-781, and '-797 shall not exceed 4.09 MMscf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Permittee shall maintain accurate daily records of gas flowrate delivered to steam generators S-1547-766 to '-772, '-777 to '-781, and '-797. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Total PM₁₀ emissions for steam generators S-1547-766 to '-772, '-777 to '-781, and '-797 shall not exceed 129.1 lb/day nor 47,122 lb/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Emission rates, except during startup, shutdown, and refractory curing from the combustion of natural gas, shall not exceed any of the following: PM₁₀: 0.005 lb/MMBtu or SO_x (as SO₂): 0.002 lb/MMBtu. [District Rules 2201, 2520, 4201, 4301, 4406, 4801 and Kern County Rules 424] Federally Enforceable Through Title V Permit
18. 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): 0.018 lb/MMBtu or 15 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
19. 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

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CONDITIONS CONTINUE ON NEXT PAGE

20. Emission rates shall not exceed any of the following: VOC: 4.3 lb/day, NOx (as NO₂): 49.0 lb/day or 9,461 lb/year, or CO: 43.2 lb/day [District Rule 2201] Federally Enforceable Through Title V Permit
21. 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
22. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
23. If 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, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
24. 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
25. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NOx and CO concentrations corrected to 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, 4306, and 4320] Federally Enforceable Through Title V Permit
26. 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
27. Source testing to measure natural gas-combustion NOx 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
28. 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

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CONDITIONS CONTINUE ON NEXT PAGE

29. 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
30. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (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, SOx (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
31. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
32. Operator shall provide an annual fuel sulfur content analysis to the District upon request. [District Rule 4320]
33. 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
34. Formerly S-1511-125

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: S-1547-769-17

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: NW35 TOWNSHIP: 12N RANGE: 24W

EQUIPMENT DESCRIPTION:

MODIFICATION OF 62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS-FIRED STEAM GENERATOR, WITH COEN QLN-ULN BURNER, FLUE GAS RECIRCULATION AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819. (MOCO #607) (SOUTH MIDWAY): 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; LOWER NOX LIMIT TO 7 PPMV @ 3% O2 AND LIMIT FUEL SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

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. {1831} 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] Federally Enforceable Through Title V Permit
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] 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-1547-769-17: Apr 16 2010 2:38PM - RICKARDA : Joint Inspection NOT Required

5. The permittee's request for approval of equivalent equipment shall include the make, model, manufacturer's maximum rating, manufacturer's guaranteed emissions rates, equipment drawing(s) and operational characteristics/parameters [District Rule 2010] Federally Enforceable Through Title V Permit
6. 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
7. {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
8. 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
9. 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, 4306, 4320, and 4351, 6.2.1] Federally Enforceable Through Title V Permit
10. The operator shall demonstrate compliance with this unit's sulfur compound exhaust concentration limit(s) using one of the following: fire the unit only on PUC or FERC regulated natural gas, 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
11. {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
12. Steam generator shall be equipped with operational fuel gas and vapor recovery gas volumetric flow meters. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Only natural gas or a combination of natural gas and TEOR well vent vapors from well vent vapor control system S-1547-819 shall be used as fuel in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
14. When combusting a combination of natural gas and vapor recovery gas, the fuel gas sulfur content shall not exceed 5 grains of total sulfur (as H₂S) per 100 dscf of fuel gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
15. Maximum heat input to steam generator shall not exceed 1,440 MMBTU/day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Total TEOR gas from permit S-1547-819 incinerated in steam generators S-1547-766 to '-772, '-777 to '-781, and '-797 shall not exceed 4.09 MMscf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Permittee shall maintain accurate daily records of gas flowrate delivered to steam generators S-1547-766 to '-772, '-777 to '-781, and '-797. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Total PM₁₀ emissions for steam generators S-1547-766 to '-772, '-777 to '-781, and '-797 shall not exceed 129.1 lb/day nor 47,122 lb/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Emission rates, except during startup, shutdown, and refractory curing from the combustion of natural gas, shall not exceed any of the following: PM₁₀: 0.005 lb/MMBtu or SO_x (as SO₂): 0.002 lb/MMBtu. [District Rules 2201, 2520, 4201, 4301, 4406, 4801 and Kern County Rules 420] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

21. Emission rates, except during startup, shutdown, and refractory curing shall not exceed any of the following: VOC: 0.003 lb/MMBtu, NOx (as NO₂): 0.008 lb/MMBtu or 7 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
22. 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
23. Emission rates shall not exceed any of the following: VOC: 4.3 lb/day, NOx (as NO₂): 49.0 lb/day or 4205 lb/year, or CO: 43.2 lb/day [District Rule 2201] Federally Enforceable Through Title V Permit
24. During a "shakedown" period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NOx emission shall not exceed 15 ppmvd NOX @ 3% O₂ or 0.018 lb-NOX/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline selected for this unit. Permittee shall maintain a record of the date of initial operation for at least 5 years. [District Rule 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
25. 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
26. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
27. If 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, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
28. 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
29. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NOx and CO concentrations corrected to 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, 4306, and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

30. 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
31. Source testing to measure natural gas-combustion NOx 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
32. Source testing to measure NOx and CO emissions from this unit shall be conducted within 60 days of initial operation under this ATC. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
33. 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
34. 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
35. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (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, SOx (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
36. 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
37. Operator shall provide an annual fuel sulfur content analysis to the District upon request. [District Rule 4320]
38. 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
39. Formerly S-1511-126

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-1547-769-18

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: NW35 TOWNSHIP: 12N RANGE: 24W

EQUIPMENT DESCRIPTION:

MODIFICATION OF 62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS-FIRED STEAM GENERATOR, WITH COEN QLN-ULN BURNER, FLUE GAS RECIRCULATION AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819. (MOCO #607) (SOUTH MIDWAY): 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; LOWER NOX LIMIT TO 9 PPMV @ 3% O2 AND LIMIT FUEL SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

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. {1831} 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] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director, APCO

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DAVID WARNER, Director of Permit Services
S-1547-769-18: Apr 18 2010 2:38PM - RICKARDK : Joint Inspection NOT Required

5. The permittee's request for approval of equivalent equipment shall include the make, model, manufacturer's maximum rating, manufacturer's guaranteed emissions rates, equipment drawing(s) and operational characteristics/parameters [District Rule 2010] Federally Enforceable Through Title V Permit
6. 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
7. {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
8. 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
9. 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, 4306, 4320, and 4351, 6.2.1] Federally Enforceable Through Title V Permit
10. The operator shall demonstrate compliance with this unit's sulfur compound exhaust concentration limit(s) using one of the following: fire the unit only on PUC or FERC regulated natural gas, 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
11. {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
12. Steam generator shall be equipped with operational fuel gas and vapor recovery gas volumetric flow meters. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Only natural gas or a combination of natural gas and TEOR well vent vapors from well vent vapor control system S-1547-819 shall be used as fuel in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
14. When combusting a combination of natural gas and vapor recovery gas, the fuel gas sulfur content shall not exceed 5 grains of total sulfur (as H₂S) per 100 dscf of fuel gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
15. Maximum heat input to steam generator shall not exceed 1,440 MMBTU/day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Total TEOR gas from permit S-1547-819 incinerated in steam generators S-1547-766 to '-772, '-777 to '-781, and '-797 shall not exceed 4.09 MMscf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Permittee shall maintain accurate daily records of gas flowrate delivered to steam generators S-1547-766 to '-772, '-777 to '-781, and '-797. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Total PM₁₀ emissions for steam generators S-1547-766 to '-772, '-777 to '-781, and '-797 shall not exceed 129.1 lb/day nor 47,122 lb/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Emission rates, except during startup, shutdown, and refractory curing from the combustion of natural gas, shall not exceed any of the following: PM₁₀: 0.005 lb/MMBtu or SO_x (as SO₂): 0.002 lb/MMBtu. [District Rules 2201, 2520, 4201, 4301, 4406, 4801 and Kern County Rules 429] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

21. 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 Rules 2201, 2520, 4301, 4305, 4306, 4320, 4405 and Kern County Rule 425] Federally Enforceable Through Title V Permit
22. 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
23. Emission rates shall not exceed any of the following: VOC: 4.3 lb/day, NOx (as NO2): 49.0 lb/day or 5782 lb/year, or CO: 43.2 lb/day [District Rule 2201] Federally Enforceable Through Title V Permit
24. During a "shakedown" period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NOx emission shall not exceed 15 ppmvd NOX @ 3% O2 or 0.018 lb-NOX/MMBtu. The shakedown period shall be concluded prior to the applicable Rule 4320 compliance deadline selected for this unit. Permittee shall maintain a record of the date of initial operation for at least 5 years. [District Rule 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
25. 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
26. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
27. If 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, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
28. 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
29. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 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, 4306, and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

30. 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
31. Source testing to measure natural gas-combustion NOx 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
32. Source testing to measure NOx and CO emissions from this unit shall be conducted within 60 days of initial operation under this ATC. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
33. 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
34. 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
35. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (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, SOx (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
36. 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
37. Operator shall provide an annual fuel sulfur content analysis to the District upon request. [District Rule 4320]
38. 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
39. Formerly S-1511-126

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-1547-769-19

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: NW35 **TOWNSHIP:** 12N **RANGE:** 24W

EQUIPMENT DESCRIPTION:

MODIFICATION OF 62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS-FIRED STEAM GENERATOR, WITH COEN QLN-ULN BURNER, FLUE GAS RECIRCULATION AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819. (MOCO #607) (SOUTH MIDWAY): LIMIT FUEL SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

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. {1831} 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. 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
4. {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

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-1547-769-19 : Apr 16 2010 2:38PM - RICKARDK : Joint Inspection NOT Required