



JUN 11 2010

Mr. Larry Landis  
Chevron U.S.A., Inc.  
P.O. Box 1392  
Bakersfield, CA 93302

**Re: Notice of Preliminary Decision - ATC / Certificate of Conformity  
Facility # S-1131  
Project # S-1094657 and S-1094659**

Dear Mr. Landis:

Enclosed for your review and comment is the District's analysis of an application for Authorities to Construct for Chevron U.S.A., Inc. Kern River Oilfield within Chevron's Heavy Oil Central Stationary Source, CA. Chevron proposes to limit fuel sulfur or operate a sulfur scrubber, and/or install low-NOx burners in various steam generators to comply with Rule 4320.

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.

**Seyed Sadredin**

Executive Director/Air Pollution Control Officer

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**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  
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**Southern Region**

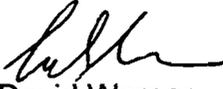
34946 Flyover Court  
Bakersfield, CA 93308-9725

Tel: 661-392-5500 FAX: 661-392-5585

Mr. Larry Landis  
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Thank you for your cooperation in this matter.

Sincerely,

  
David Warner  
Director of Permit Services

Enclosures

c: Kris Rickards, Permit Services



**JUN 1 1 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-1131  
Project # S-1094657 and S-1094659**

Dear Mr. Rios:

Enclosed for your review is the District's engineering evaluation of an application for Authorities to Construct for Chevron U.S.A., Inc. Kern River Oilfield within Chevron's Heavy Oil Central Stationary Source, CA, which has been issued a Title V permit. Chevron U.S.A., Inc. is requesting that Certificates of Conformity, with the procedural requirements of 40 CFR Part 70, be issued with this project. Chevron proposes to limit fuel sulfur or operate a sulfur scrubber, and/or install low-NOx burners in various steam generators to comply with Rule 4320.

Enclosed is the engineering evaluation of this application, along with the current Title V permit, and proposed Authorities to Construct # S-1131-62-31, '-63-26, '-64-26, '-65-27, '-66-25, '-67-26, '-68-25, '-69-25, '-70-25, '-73-25, '-77-26, '-78-25, '-82-28, '-94-29, '-95-25, '-98-31, '-99-32, '-858-15, '-859-16, '-877-17, '-879-22, '-880-16, '-881-17, '-883-17, '-884-19, '-908-20, '-912-9, '-941-15, '-943-16, '-966-15, '-976-12, '-987-12, '-992-12, '-993-11, '-994-12, '-997-12, '-998-11, '-999-11, '-1000-11, '-1001-12, '-1002-11, '-1003-11, '-1004-11, '-1016-13 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.

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

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Mr. Gerardo C. Rios  
Page 2

Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "David Warner", is written over the typed name.

David Warner  
Director of Permit Services

Enclosures

c: Kris Rickards, Permit Services



JUN 11 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-1131**  
**Project # S-1094657 and S-1094659**

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of an application for Authorities to Construct for Chevron U.S.A., Inc. Kern River Oilfield within Chevron's Heavy Oil Central Stationary Source, CA. Chevron proposes to limit fuel sulfur or operate a sulfur scrubber, and/or install low-NOx burners in various steam generators to comply with Rule 4320.

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

Enclosures  
c: Kris Rickards, Permit Services

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

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Tel: 661-392-5500 FAX: 661-392-5585

# San Joaquin Valley Air Pollution Control District Authority to Construct

## Modification of Natural Gas-Fired Steam Generators for Rule 4320 Compliance

Facility Name: Chevron USA, Inc. Date: June 7, 2010  
Mailing Address: P.O. Box 1392 Engineer: Kris Rickards  
Bakersfield, CA 93302 Lead Engineer: Rich Karrs  
Contact Person: Larry Landis Sharon Walker *RWK*  
Telephone: 661-654-7141 661-6547487 *6-8-10*  
Fax: 661-654-7606 661-654-7606  
E-Mail: [landilr@chevron.com](mailto:landilr@chevron.com) [swalk@chevron.com](mailto:swalk@chevron.com)  
Application #(s): S-1131-62-31, '-63-26, '-64-26, '-65-27, '-66-25, '-67-26, '-68-25, '-69-25,  
'-70-25, '-73-25, '-77-26, '-78-25, '-82-28, '-94-29, '-95-25, '-98-31,  
'-99-32, '-858-15, '-859-16, '-877-17, '-879-22, '-880-16, '-881-17,  
'-883-17, '-884-19, '-908-20, '-912-9, '-941-15, '-943-16, '-966-15,  
'-976-12, '-987-12, '-992-12, '-993-11, '-994-12, '-997-12, '-998-11,  
'-999-11, '-1000-11, '-1001-12, '-1002-11, '-1003-11, '-1004-11, '-1016-13  
Project #: S-1094657, '-1094659  
Deemed Complete: September 18, 2009 (S-1094657) and September 21, 2009 (S-1094659)

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### I. PROPOSAL

Chevron U.S.A. Inc. (hereafter referred to as CUSA) is requesting Authorities to Construct (ATC) to revise SO<sub>x</sub> limits on steam generators located in the Kern River Field. These steam generators incinerate either casing vapors and/or tank vapor recovery gas along with natural gas. In order to comply with District Rule 4320 requirements, CUSA proposes to limit fuel sulfur content to either 5 gr-S/100 dscf or the currently permitted level, whichever is lower (Section 5.4.1.2), or operate a scrubber to reduce emissions by 95% or to 9ppm @ 3% O<sub>2</sub> (Section 5.4.1.3).

For all of the subject units CUSA intends to comply with the NO<sub>x</sub> requirements of Rule 4320 by paying annual emission fees as allowed in Section 5.1.2. Eighteen of the steam generators are currently dormant and will be retrofitted with low Low-NO<sub>x</sub> burners to meet a 15 ppmv NO<sub>x</sub> limit for Rule 4306 compliance and allow their operation as fee paying units under Rule 4320.

In addition to these modifications CUSA is requesting that the location on steam generator S-1131-77 and '-78 be corrected to the original location at the SE ¼ of Section 29, T28S, R28E and correct steam generator S-1131-976 to the original location of SE3, T29S, R28E. These locations were inadvertently changed during the initial Title V permitting (project S-970709).

CUSA requests that PUC gas-fired unit's SO<sub>x</sub> emission factors be made consistent with the District approved SO<sub>x</sub> factor of 0.00285 lb/MMBtu (equivalent to 1 gr-S/100 dscf) per APR 1720.

There will not be an increase in potential emissions of any pollutant as a result of this project. Installation of new burners and limiting NO<sub>x</sub> and SO<sub>x</sub> emissions on all steam generators is proposed solely to comply with District Rule 4320 requirements.

Chevron U.S.A. Inc. received their Title V Permit on February 28, 2007. 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. Chevron U.S.A. Inc. must apply to administratively amend their Title V Operating Permit to include the requirements of the ATC(s) 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 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**

These units are located at the Kern River Oilfield within CUSA's Heavy Oil Central 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**

Steam generators are used to provide high quality steam for injection into heavy crude oil bearing strata via injection wells. The heat added by the steam reduces the viscosity of the crude oil making it easier to produce. These units can operate a maximum of 24 hr/day, 7 days/week, and 52 weeks/year.

## V. EQUIPMENT LISTING

### Pre-Project Equipment Description:

See Current Base Documents in Appendix A.

### Proposed Modification:

ATC #	Install New Burner and limit NOx to 15 ppm
S-1131-65	INSTALL NORTH AMERICAN GLE LOW-NOX BURNER, LIMIT NOX TO 15 PPM @ 3% O2, AND LIMIT FUEL SULFUR CONTENT TO 1 GR-S/100 DSCF FOR RULES 4306 AND 4320 COMPLIANCE
S-1131-77	INSTALL NORTH AMERICAN GLE LOW-NOX BURNER, LIMIT NOX TO 15 PPM @ 3% O2, AND LIMIT FUEL SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULES 4306 AND 4320 COMPLIANCE AND CORRECT OPERATING LOCATION TO SE29, T28S, R28E
S-1131-94, '-858, '-941, '-943, '-966, '-992, '-993, '-994, '-998, '-1000, '-1001, '-1003, '-1004, '-1016	INSTALL NORTH AMERICAN GLE LOW-NOX BURNER, LIMIT NOX TO 15 PPM @ 3% O2, AND LIMIT FUEL SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULES 4306 AND 4320 COMPLIANCE
S-1131-976, '-1002	INSTALL NORTH AMERICAN GLE LOW-NOX BURNER, LIMIT NOX TO 15 PPM @ 3% O2, AND LIMIT FUEL SULFUR CONTENT TO 1 GR-S/100 DSCF FOR RULES 4306 AND 4320 COMPLIANCE AND CORRECT LOCATION TO SE3, T29S, R28E

ATC #	SOx Control Only ATC Equipment Description
S-1131-62, '-63, '-64, '-66, '-67, '-68, '-69, '-70, '-73, '-912	LIMIT FUEL SULFUR CONTENT TO 1 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE
S-1131-78	LIMIT FUEL SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE AND CORRECT OPERATING LOCATION TO SE29, T28S, R28E
S-1131-82, '-95, '-98, '-99, '-859	LIMIT FUEL SULFUR CONTENT TO 5 GR-S/100 DSCF OR REDUCE SOX BY 95% OR LIMIT EXHAUST SO2 TO 9 PPMV FOR RULE 4320 COMPLIANCE
S-1131-877, '-879, '-880, '-881, '-883, '-884, '-908, '-987, '-997, '-999	LIMIT FUEL SULFUR CONTENT TO 5 GR-S/100 DSCF FOR RULE 4320 COMPLIANCE

### Post Project Equipment Description:

All units except those installing new burners (S-1131-62-31, '-63-26, '-64-26, '-66-25, '-67-26, '-68-25, '-69-25, '-70-25, '-73-25, '-78-25, '-82-28, '-95-25, '-98-31, '-99-32, '-859-16, '-877-17, '-879-22, '-880-16, '-881-17, '-883-17, '-884-19, '-908-20, '-912-9, '-987-12, '-997-12, '-999-11):

*[Pre-Project Equipment Description]*

Units installing new burners (S-1131-65-27, '-77-26, '-94-29, '-858-15, '-941-15, '-943-16, '-966-15, '-976-12, '-992-12, '-993-11, '-994-12, '-998-11, '-1000-11, '-1001-12, '-1002-11, '-1003-11, '-1004-11, '-1016-13):

... MMBTU/HR ... WITH A NORTH AMERICAN MODEL GLE LOW-NOX BURNER,...

## VI. EMISSION CONTROL TECHNOLOGY EVALUATION

Ultra Low-NO<sub>x</sub> burners reduce NO<sub>x</sub> 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<sub>x</sub> 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<sub>x</sub>. 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.

The use of flue gas re-circulation (FGR) can reduce nitrogen oxides (NO<sub>x</sub>) 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<sub>x</sub> is formed by high flame temperatures, the lower flame temperatures produced by FGR serve to reduce thermal NO<sub>x</sub>.

## VII. GENERAL CALCULATIONS

### A. Assumptions

- Maximum operating schedule is 24 hours per day
- For units firing on PUC quality gas only the SO<sub>x</sub> emission factor is equal to 1 gr-S/100 dscf, equivalent to 0.00285 lb/MMBtu (APR 1720)
- Revised SO<sub>x</sub> emission factors are not considered an increase in emissions (APR 1110)
- For units firing on PUC and non-PUC gas the SO<sub>x</sub> emission factor will be equal to 5 gr-S/100 dscf or the currently permitted level, whichever is lower (Rule 4320, Section 5.4.1.2)
- Natural Gas Heating Value: 1,000 Btu/scf (District Practice)
- F-Factor for Natural Gas: 8,578 dscf/MMBtu corrected to 60°F (40 CFR 60, Appendix B)
- There will be no change in PM<sub>10</sub>, CO, or VOC emissions as a result of this project
- There will be no change in NO<sub>x</sub> emissions for units complying with the NO<sub>x</sub> fee pay option of Rule 4320
- Daily NO<sub>x</sub> emissions will be based on the Rule 4305 limit of 30 ppmv to account for startups and shutdowns (District Practice)

**B. Emission Factors**

**Pre-Project Emission Factors**

Pre-project emission factors are listed in the tables below for the steam generators:

Permit Units	Pollutant	Pre-Project Emission Factors		Source
S-1131-62, '-63, '-64, '-66, '-67, '-68, '-69, '-70, '-73, '-78, '-82, '-95, '-98, '-99, '-859, '-877, '-879, '-880, '-881, '-883, '-884, '-908, '-912, '-987, '-997, '-999	NO <sub>x</sub>	0.018 lb-NO <sub>x</sub> /MMBtu	15 ppmvd NO <sub>x</sub> (@ 3% O <sub>2</sub> )	Current Permit
S-1131-65, '-77, '-94, '-858, '-941, '-966, '-976, '-992, '-993, '-994, '-998, '-1000, '-1001, '-1002, '-1003, '-1004, '-1016	NO <sub>x</sub>	0.036 lb-NO <sub>x</sub> /MMBtu	30 ppmvd NO <sub>x</sub> (@ 3% O <sub>2</sub> )	Current Permit
S-1131-943	NO <sub>x</sub>	0.117 lb-NO <sub>x</sub> /MMBtu	--	Current Permit
S-1131-62, '-63, '-64, '-65, '-65, '-66, '-67, '-68, '-69, '-70, '-73, '-912	SO <sub>x</sub>	0.00285 lb-SO <sub>x</sub> /MMBtu	1 gr S/100 scf	Current Permit/ APR 1720
S-1131-77, '-78, '-82, '-94, '-95, '-98, '-99, '-858, '-859	SO <sub>x</sub>	1.026 lb-SO <sub>x</sub> /MMBtu	--	Current Permit
S-1131-877	SO <sub>x</sub>	0.0427 lb-SO <sub>x</sub> /MMBtu	64 lbs/day	Current Permit
S-1131-879, '-908	SO <sub>x</sub>	0.055 lb-SO <sub>x</sub> /MMBtu	--	Current Permit
S-1131-880, '-881, '-883, '-884	SO <sub>x</sub>	0.070 lb-SO <sub>x</sub> /MMBtu	105.1 lbs/day	Current Permit
S-1131-941, '-966	SO <sub>x</sub>	0.184 lb-SO <sub>x</sub> /MMBtu	--	Current Permit
S-1131-943	SO <sub>x</sub>	0.081 lb-SO <sub>x</sub> /MMBtu	--	Current Permit
S-1131-976, '-1002	SO <sub>x</sub>	0.005 lb-SO <sub>x</sub> /MMBtu	--	Current Permit
S-1131-987, '-992	SO <sub>x</sub>	0.052 lb-SO <sub>x</sub> /MMBtu	--	Current Permit
S-1131-993	SO <sub>x</sub>	0.0243 lb-SO <sub>x</sub> /MMBtu	--	Current Permit
S-1131-994	SO <sub>x</sub>	0.062 lb-SO <sub>x</sub> /MMBtu	--	Current Permit
S-1131-997	SO <sub>x</sub>	0.075 lb-SO <sub>x</sub> /MMBtu	--	Current Permit
S-1131-998, '-999, '-1003, '-1004	SO <sub>x</sub>	0.030 lb-SO <sub>x</sub> /MMBtu	--	Current Permit
S-1131-1000	SO <sub>x</sub>	0.0083 lb-SO <sub>x</sub> /MMBtu	--	Current Permit
S-1131-1001	SO <sub>x</sub>	0.008 lb-SO <sub>x</sub> /MMBtu	--	Current Permit
S-1131-1016	SO <sub>x</sub>	0.0673 lb-SO <sub>x</sub> /MMBtu	--	Current Permit

**Post Project Emission Factors**

Permit Unit	Post-Project Emission Factor for NO <sub>x</sub>	Source
All Units	0.018 lb-NO <sub>x</sub> /MMBtu or 15 ppmv @ 3% O <sub>2</sub>	Rule 4320, Section 5.1.2

**Rule 4320 5.4.1.2 Sulfur compliance option:**

For units complying with Section 5.4.1.2 of Rule 4320 the SO<sub>x</sub> concentration (measured as H<sub>2</sub>S plus all forms of mercaptans in the fuel) is calculated as follows:

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

The steam generators operating under this compliance option will result in a SO<sub>x</sub> emission rate of 0.0143 lb/MMBtu or the current limit, whichever is lower.

Permit Unit	Post-Project Emission Factor for SO <sub>x</sub>	Source
S-1131-62, '-63, '-64, '-65, '-66, '-67, '-68, '-69, '-70, '-73, '-912, '-976, '-1002	0.00285 lb-SO <sub>x</sub> /MMBtu	Rule 4320, Section 5.4.1.1
S-1131-77, '-78, '-94, '-858, '-877, '-879, '-880, '-881, '-883, '-884, '-908, '-941, '-943, '-966, '-987, '-992, '-993, '-994, '-997, '-998, '-999, '-1000, '-1001, '-1003, '-1004, '-1016	0.0143 lb-SO <sub>x</sub> /MMBtu	Rule 4320, Section 5.4.1.2
S-1131-82, '-95, '-98, '-99, '-859	1.026 lb-SO <sub>x</sub> /MMBtu <sup>1</sup>	Rule 4320, Section 5.4.1.3 (Current Operating Permit) <sup>1</sup>

**C. Calculations**

**1. Pre-Project Potential to Emit (PE1)**

The PE1 for NO<sub>x</sub> is calculated as follows and summarized in the table below:

- PE1 = NO<sub>x</sub> (lb/MMBtu) × Heat Input (MMBtu/day or year)

Unit	PE1				
	NO <sub>x</sub> (lb/MMBtu)	Heat Input (MMBtu/day)	Heat Input (MMBtu/year)	Daily PE1 (lb/day)	Annual PE1 (lb/year)
S-1131-62, '-63, '-64, '-66, '-67, '-68, '-69, '-70, '-73, '-78, '-82, '-95, '-98, '-99, '-859, '-877, '-879, '-880, '-881, '-883, '-884, '-908, '-912, '-987, '-997, '-999	0.018	1,500	547,500	54.0	9,855
S-1131-65, '-77, '-94, '-858, '-992, '-993, '-994, '-998, '-1000, '-1001, '-1002, '-1003, '-1004, '-1016	0.036	1,500	547,500	54.0	19,710
S-1131-943	0.117	1,500	90,000	175.5	10,530
S-1131-941, '-966	0.036	660	240,900	23.8	8,672
S-1131-976	0.036	552	201,480	19.9	7,253

<sup>1</sup> SO<sub>x</sub> reduction is made through use of the scrubber

The PE1 for SO<sub>x</sub> is calculated as follows and summarized in the table below:

▪ PE1 = SO<sub>x</sub> (lb/MMBtu) × Heat Input (MMBtu/day or year)

Unit	PE1				
	SO <sub>x</sub> (lb/MMBtu)	Heat Input (MMBtu/day)	Heat Input (MMBtu/year)	Daily PE1 (lb/day)	Annual PE1 (lb/year)
S-1131-62, '-63, '-64, '-65, '-66, '-67, '-68, '-69, '-70, '-73, '-912	0.00285	1,500	547,500	4.3	1,560
S-1131-77, '-78, '-82, '-94, '-95, '-98, '-99, '-858, '-859	1.026	1,500	547,500	1,539.0	561,735
S-1131-877	0.0427	1,500	547,500	64.1	23,378
S-1131-879, '-908	0.055	1,500	547,500	82.5	30,113
S-1131-880, '-881, '-883, '-884	0.07	1,500	547,500	105.0	38,325
S-1131-941, '-966	0.184	660	201,480	121.4	37,072
S-1131-943	0.081	1,500	90,000	121.5	7,290
S-1131-976	0.005	552	201,480	2.8	1,007
S-1131-1002	0.005	1,500	547,500	7.5	2,738
S-1131-987, '-992	0.052	1,500	547,500	78.0	28,470
S-1131-993	0.0243	1,500	547,500	36.5	13,304
S-1131-994	0.062	1,500	547,500	93.0	33,945
S-1131-997	0.075	1,500	547,500	112.5	41,063
S-1131-998, '-999, '-1003, '-1004	0.03	1,500	547,500	45.0	16,425
S-1131-1000	0.0083	1,500	547,500	12.5	4,544
S-1131-1001	0.008	1,500	547,500	12.0	4,380
S-1131-1016	0.0673	1,500	547,500	101.0	36,847

## 2. Post-Project Potential to Emit (PE2)

The PE2 for NO<sub>x</sub> is calculated as follows and summarized in the table below:

▪ PE2 = NO<sub>x</sub> (lb/MMBtu) × Heat Input (MMBtu/day or year)

Unit	PE2				
	NO <sub>x</sub> (lb/MMBtu)	Heat Input (MMBtu/day)	Heat Input (MMBtu/year)	Daily PE2 (lb/day)	Annual PE2 (lb/year)
S-1131-941, '-966	0.018	660	240,900	23.8	4,336
S-1131-943	0.018	1,500	90,000	54.0	1,620
S-1131-976	0.018	552	201,480	19.9	3,627
All Other Units	0.018	1,500	547,500	54.0	9,855

The PE2 for SO<sub>x</sub> is calculated as follows and summarized in the table below:

▪ PE2 = SO<sub>x</sub> (lb/MMBtu) × Heat Input (MMBtu/day or year)

Unit	PE2				
	SO <sub>x</sub> (lb/MMBtu)	Heat Input (MMBtu/day)	Heat Input (MMBtu/year)	Daily PE2 (lb/day)	Annual PE2 (lb/year)
S-1131-62, '-63, '-64, '-65, '-66, '-67, '-68, '-69, '-70, '-73, '-912, '-1002	0.00285	1,500	547,500	4.3	1,560
S-1131-1000	0.0083	1,500	547,500	12.5	4,544
S-1131-1001	0.008	1,500	547,500	12.0	4,380
S-1131-77, '-78, '-94, '-858, '-877, '-879, '-880, '-881, '-883, '-884, '-908, '-987, '-992, '-993, '-994, '-997, '-998, '-999, '-1003, '-1004, '-1016	0.0143	1,500	547,500	21.5	7,829
S-1131-941, '-966	0.0143	660	240,900	9.4	3,445
S-1131-943	0.0143	1,500	90,000	21.5	1,287
S-1131-976	0.00285	552	201,480	1.6	574
S-1131-82, '-95, '-98, '-99, '859	1.026	1,500	547,500	1,539.0	561,735

### 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,
- An offset threshold will be surpassed, or
- A Stationary Source Increase in Permitted Emissions (SSIPE) 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<sub>x</sub> 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 lbs/year) is performed pollutant-by-pollutant for each unit within the project, to calculate the QNEC and if applicable, to determine the amount of offsets required.

Pursuant to Section 3.7 of District Rule 2201, BE = Pre-project Potential to Emit for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to Section 3.22 of District Rule 2201.

This steam generators in this project are exempt from offsets pursuant to Rule 2201, Section 4.6.8 as the modification is being made solely to comply with Rule 4320.

### 7. Major Modification

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

District Rule 2201 references the definition of major modification provided in 40 CFR 51.165 (v)(A) in effect on December 19, 2002, where major modification means any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act.

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 PM<sub>10</sub>, 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:

<b>Major Modification Thresholds (Existing Major Source)</b>			
Pollutant	NEI (lb/year)	Threshold (lb/year)	Major Modification?
NO <sub>x</sub>	>50,000	50,000	Yes <sup>2</sup>
SO <sub>x</sub>	>80,000	80,000	Yes <sup>2</sup>
PM <sub>10</sub>	>30,000	30,000	Yes <sup>2</sup>
VOC	>50,000	50,000	Yes <sup>2</sup>

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

<sup>2</sup> Due to the large number of affected units proposed by CUSA 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.

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

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 increase 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<sub>x</sub>, or 25 tons per year of VOC, or 15 tons per year of SO<sub>x</sub>, or 15 tons per year of PM<sub>10</sub>, or 50 tons per year of CO.

Since each of the above-listed criteria are met for the steam generators, 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<sub>x</sub>, or 25 tons per year of VOC, or 15 tons per year of SO<sub>x</sub>, 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 for the steam generators.

## **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 these units.

## **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 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 will be required for this project.

**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.

All Units:

- *[Except during startup, shutdown, and the shakedown period] or [Except during startup and shutdown]*, emissions shall not exceed any of the following limits when this unit is burning 50% or greater by volume PUC quality gas on a monthly average basis: 15 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.018 lb-NO<sub>x</sub>/MMBtu and XX ppmvd CO @ 3% O<sub>2</sub> or X.XX lb-CO/MMBtu. [District Rules 2201, 4305, 4306, and 4320]

S-1131-62, '-63, '-64, '-65, '-66, '-67, '-68, '-69, '-70, '-73, '-912, '-976, '-1002 (1 grain sulfur limit):

- The operator shall fire the unit only on natural gas. The combined sulfur content of all fuels supplied to this steam generator shall not exceed 1.0 gr S/100 scf. [District Rules 2201, 4406, and 4320]
- Emission rates shall not exceed any of the following limits: 0.005 lb-PM<sub>10</sub>/MMBtu or 0.006 lb-VOC/MMBtu. [District Rule 2201]

S-1131-77, '-78, '-94, '-858, '-877, '-879, '-880, '-881, '-883, '-884, '-908, '-941, '-943, '-966, '-987, '-992, '-993, '-994, '-997, '-998, '-999, '-1000, '-1001, '-1003, '-1004, '-1016 (5 grain sulfur limit):

- The operator shall fire the unit only on natural gas and vapor recovery gas that has a combined fuel sulfur content not exceeding 5.0 gr S/100 scf. [District Rules 2201, 4406, and 4320]
- Emission rates shall not exceed any of the following limits: 0.108 lb-PM10/MMBtu; or 0.006 lb-VOC/MMBtu. [District Rule 2201]

S-1131-82, '-95, '-98, '-99, '-859 (operating a sulfur scrubber):

- The operator shall fire the unit only on natural gas, recovered vapors and vapor recovery gas from the vapor control system listed on permit unit PTO S-1131-598 that has a combined fuel sulfur content not exceeding 5.0 gr S/100 scf unless SO<sub>x</sub> is reduced by 95% or to an outlet concentration not exceeding 9 ppmv via scrubbing. [District Rules 2201, 4406, and 4320]
- Whenever the unit is switched to scrubbed operation, compliance source testing for SO<sub>x</sub> shall be conducted within 60 days of initial scrubbing date unless source testing under scrubbed operation has occurred within the previous 12 months. [District Rules 2201 and 4320]

SO<sub>x</sub> reduction will be made through the use of either operating a sulfur scrubber or by incinerating PUC quality gas. Therefore, no change to the DEL regarding sulfur emissions from these units is required.

## **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.

### **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*

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

Chevron USA, Inc. 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 requested 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 NSR Rule]
- {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]

#### 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 are the units being modified (as defined above). Since the permittee is only reducing their allowable

limits of SO<sub>x</sub> with existing equipment for compliance with District rules and regulations the requirements of these sections do not apply to the unit.

**District Rule 4101 Visible Emissions**

Per Section 5.0, no person shall discharge into the atmosphere emissions of any air contaminant aggregating more than 3 minutes in any hour which is as dark as or darker than Ringelmann 1 (or 20% opacity). As the steam generators are fired solely on natural gas, visible emissions are not expected to exceed Ringelmann 1 or 20% opacity. Also, based on past inspections of the facility continued compliance 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. The following condition is currently listed on CUSA's facility wide permit:

- {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. The worst case emissions unit will be used for this calculation (S-1131-82 @ 0.108 lb-PM<sub>10</sub>/MMBtu).

F-Factor for NG:	8,578 dscf/MMBtu at 60 °F
PM10 Emission Factor:	0.108 lb-PM <sub>10</sub> /MMBtu
Percentage of PM as PM10 in Exhaust:	100%
Exhaust Oxygen (O <sub>2</sub> ) Concentration:	3%

$$\text{Excess Air Correction to F Factor} = \frac{20.9}{(20.9 - 3)} = 1.17$$

$$GL = \left( \frac{0.108 \text{ lb-PM}}{\text{MMBtu}} \times \frac{7,000 \text{ grain}}{\text{lb-PM}} \right) / \left( \frac{8,578 \text{ ft}^3}{\text{MMBtu}} \times 1.17 \right)$$

$$GL = 0.08 \text{ grain/dscf} < 0.1 \text{ grain/dscf}$$

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

- 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 SO<sub>2</sub>, NO<sub>2</sub>, 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.

All of these units have been found to be in compliance since the last amendment date of this rule. This project will result in the decrease in pollutants; therefore, continued compliance with this rule 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 generators are not required to tune since they follow 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 greater than 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**

All units except S-1131-65, '-77, '-94, '-858, '-941, '-943, '-966, '-976, '-992, '-993, '-994, '-998, '-1000, '-1001, '-1002, '-1003, '-1004, '-1016:

These units are natural gas-fired with a maximum heat input greater than 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.*

These units are currently in compliance with the applicable provisions of Rule 4306. 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

S-1131-65, '-77, '-94, '-858, '-941, '-943, '-966, '-976, '-992, '-993, '-994, '-998, '-1000, '-1001, '-1002, '-1003, '-1004, '-1016:

The units have a maximum heat input greater than 5 MMBtu/hr. Pursuant to Section 2.0 of District Rule 4306, these units are subject to District Rule 4306. These units are not currently in compliance with Rule 4306 and will be evaluated in this project as follows.

**Section 5.1, NO<sub>x</sub> and CO Emissions Limits**

Section 5.1.1 requires that except for units subject to Sections 5.2, NO<sub>x</sub> and carbon monoxide (CO) emissions shall not exceed the limits specified in the following table. All ppmv emission limits specified in this section are referenced at dry stack gas conditions and 3.00 percent by volume stack gas oxygen. Emission concentrations shall be corrected to 3.00 percent oxygen in accordance with Section 8.1.

The applicable emission limit category is listed in Section 5.1.1, Table 1, Category C, from District Rule 4306 for these oilfield steam generators:

<b>Rule 4306 Emissions Limits</b>				
<b>Category</b>	<b>Operated on gaseous fuel</b>		<b>Operated on liquid fuel</b>	
	<b>NO<sub>x</sub> Limit</b>	<b>CO Limit</b>	<b>NO<sub>x</sub> Limit</b>	<b>CO Limit</b>
<b>C. Oilfield Steam Generators</b>	15 ppmv or 0.018 lb/MMBtu	400 ppmv	40 ppmv or 0.052 lb/MMBtu	400 ppmv

For the units:

- the proposed NO<sub>x</sub> emission factor is 15 ppmvd @ 3% O<sub>2</sub> (0.018 lb/MMBtu), and
- the proposed CO emission factor is ≤ 400 ppmvd @ 3% O<sub>2</sub>.

Therefore, compliance with Section 5.1 of District Rule 4306 is expected.

A permit condition listing the emissions limits will be listed on permit as shown in the preceding DEL section.

**Section 5.2, Low Use**

The unit's annual heat input will exceed the 9 billion Btu heat input per calendar year criteria limit addressed by this section. Since the unit is not subject to Section 5.2, the requirements of this section do not apply to the unit.

### **Section 5.3, Startup and Shutdown Provisions**

Section 5.3 states that on and after the full compliance schedule specified in Section 7.1, the applicable emission limits of Sections 5.1, 5.2.2 and 5.2.3 shall not apply during start-up or shutdown provided an operator complies with the requirements specified in Sections 5.3.1 through 5.3.4.

BPC has proposed to retain existing start-up and shutdown provisions for the steam generator. Therefore, the following conditions will be listed on the proposed permit to ensure compliance:

- Duration of startup or shutdown shall not exceed two hours each per occurrence. The emissions control system shall be in operation and emissions shall be minimized insofar as technologically possible during startup and shutdown. [District Rules 4305, 4306, and 4320]
- Permittee shall maintain records of duration of each start-up and shutdown. Startup is defined as the period of time to reach operating temperature and pressure once fuel is supplied, including the time required by the emission control system to reach full operation. Shutdown is defined as the period of time taken from operating temperature and pressure until the fuel supply is completely turned off. [District Rules 2201, 4305, 4306, and 4320]

### **Section 5.4, Monitoring Provisions**

Section 5.4.2 requires that permit units subject to District Rule 4306, Section 5.1 emissions limits shall either install and maintain Continuous Emission Monitoring (CEM) equipment for NO<sub>x</sub>, CO and O<sub>2</sub>, or install and maintain APCO-approved alternate monitoring.

In order to satisfy the requirements of District Rule 4306, the applicant has proposed to use pre-approved alternate monitoring scheme A (pursuant to District Policy SSP-1105), which requires that monitoring of NO<sub>x</sub>, CO, and O<sub>2</sub> 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 permit in order to ensure compliance with the requirements of the proposed alternate monitoring plan:

- {2935} The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320]
- {2936} If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully

comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320]

- {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]
- {2938} The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320]

Since the unit is not subject to the requirements listed in Section 5.2.1 or 5.2.2, it is not subject to Section 5.4.3 requirements.

Since the unit is not subject to the requirements of category H (maximum annual heat input between 9 billion and 30 billion Btu/year) listed in Section 5.1.1, it is not subject to Section 5.4.4 requirements.

## **Section 5.5, Compliance Determination**

Section 5.5.1 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 5.1. 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 permit as follows:

- 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 5.5.2 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 permit 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. 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, 4306, and 4320]

Section 5.5.4 requires that for emissions monitoring pursuant to Sections 5.4.2 and 6.3.1 using a portable NO<sub>x</sub> 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 permit condition will be listed on the permit 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 5.5.5 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 condition will be listed on the permit as follows:

- 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 1081, 2201, 2520, 4305, 4306, and 4320]

### **Section 6.1, Recordkeeping**

Section 6.1 requires that the records required by Sections 6.1.1 through 6.1.3 shall be maintained for five calendar years and shall be made available to the APCO 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.

The following 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 6.1.2 requires that the operator of a unit subject to Section 5.2 shall record the amount of fuel use at least on a monthly basis. Since the unit is not subject to the requirements listed in Section 5.2, it is not subject to Section 6.1.2 requirements.

Section 6.1.3 requires that the operator of a unit subject to Section 5.2.1 or 6.3.1 shall maintain records to verify that the required tune-up and the required monitoring of the operational characteristics have been performed. The unit is not subject to Section 6.1.3. Therefore, the requirements of this section do not apply to the unit.

## 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 <sub>x</sub>	ppmv	EPA Method 7E or ARB Method 100
NO <sub>x</sub>	lb/MMBtu	EPA Method 19
CO	ppmv	EPA Method 10 or ARB Method 100
Stack Gas O <sub>2</sub>	%	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<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, NO<sub>x</sub> (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, stack gas velocities - EPA Method 2, stack gas moisture - EPA Method 4, PM<sub>10</sub> - EPA Method 5, SO<sub>x</sub> (lb/MMBtu) - EPA Method 6C or 8 or ARB Method 100, or fuel gas sulfur content analysis (as H<sub>2</sub>S) - EPA Method 11 or 15 or ASTM 6228 and (as total sulfur) - ASTM D1072, D3246, or D6228, or grab sample analysis by double GC for H<sub>2</sub>S and mercaptans or GC FPTD/TCO performed in the laboratory, fuel hhw (MMBtu) - ASTM D 1826 or D 1945 in conjunction with ASTM D 3588. [District Rules 1081, 2201, 4305, 4306, and 4320]

## Section 6.3, Compliance Testing

Section 6.3.1 requires that these units 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 permit as follows:

- A source test to demonstrate compliance with NO<sub>x</sub> and CO emission limits shall be performed within 60 days of startup of this unit. [District Rules 2201, 4305, 4306, and 4320]
- Source testing to measure NO<sub>x</sub> 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 2520, 9.3.2, 4305, 4306, and 4320]
- 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 is not applicable to the steam generator. 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<sub>x</sub>, CO, and O<sub>2</sub> exhaust emissions concentrations, operational characteristics monitoring requirement is satisfied, and no further discussion is required.

### **Section 7.0, Compliance Schedule**

Section 7.0 indicates that an operator with multiple units at a stationary source shall comply with this rule in accordance with the schedule specified in Table 2, Section 7.1 of District Rule 4306.

The unit will be in compliance with the emissions limits listed in table 1, Section 5.1 of this rule, and periodic monitoring and source testing as required by District Rule 4306. Therefore, requirements of the compliance schedule, as listed in Section 7.1 of District Rule 4306, 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 permit(s). Therefore, compliance with District Rule 4306 requirements 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<sub>x</sub>, CO, SO<sub>2</sub> and PM<sub>10</sub> 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<sub>x</sub> emitted over the previous year.

The units in this project are all rated greater than 5 MMBtu/hr heat input and are subject to this rule.

### **Section 5.1 NO<sub>x</sub> 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<sub>x</sub> limit specified in Table 1 of this rule.

CUSA proposes to comply with section 5.1.2 of this rule. The steam generators are either already in compliance with Rules 4305 and 4306 or will be in compliance with these rules as a result of this project. Therefore, CUSA will be required to remit an annual emissions fee pursuant to the calculation method in section 5.3 of this rule. The following conditions will be listed on the permit to ensure compliance:

- {4194} Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NO<sub>x</sub> emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NO<sub>x</sub> emission limit listed in Rule 4320. [District Rule 4320]
- {4314} Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and Rule 4320]

#### **Section 5.4 Particulate Matter Control Requirements**

Section 5.4 states that an operator of a unit(s) subject to this rule shall comply with one of the following requirements:

- 5.4.1.1 On and after the applicable NO<sub>x</sub> 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; or
- 5.4.1.2 On and after the applicable NO<sub>x</sub> 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 NO<sub>x</sub> Compliance Deadline specified in Section 5.2 Table 1, operators shall install and properly operate an emission control system that reduces SO<sub>2</sub> emissions by at least 95% by weight; or limit exhaust SO<sub>2</sub> to less than or equal to 9 ppmv corrected to 3.0% O<sub>2</sub>.
- 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.

CUSA proposes to comply with section 5.4.1.2 and 5.4.1.3 of this rule by limiting the fuel gas sulfur content to 5.0 gr-S/100 scf or operating a scrubber to reduce SO<sub>2</sub> by at least 95% by weight or limit exhaust SO<sub>2</sub> to less than or equal to 9 ppmv corrected to 3.0% O<sub>2</sub>.

The following conditions will appear on the permits:

S-1131-62, '-63, '-64, '-65, '-66, '-67, '-68, '-69, '-70, '-73, '-912, '-976, '-1002 (1 grain sulfur limit):

- The operator shall fire the unit only on natural gas. The combined sulfur content of all fuels supplied to this steam generator shall not exceed 1.0 gr S/100 scf. [District Rules 2201, 4406, and 4320]

S-1131-77, '-78, '-94, '-858, '-877, '-879, '-880, '-881, '-883, '-884, '-908, '-941, '-943, '-966, '-987, '-992, '-993, '-994, '-997, '-998, '-999, '-1000, '-1001, '-1003, '-1004, '-1016 (5 grain sulfur limit):

- The operator shall fire the unit only on natural gas and vapor recovery gas that has a combined fuel sulfur content not exceeding 5.0 gr S/100 scf. [District Rules 2201, 4406, and 4320]

S-1131-82, '-95, '-98, '-99, '-859 (operating a sulfur scrubber):

- The operator shall fire the unit only on natural gas, recovered vapors and vapor recovery gas from the vapor control system listed on permit unit PTO S-1131-598 that has a combined fuel sulfur content not exceeding 5.0 gr S/100 scf unless SO<sub>x</sub> is reduced by 95% or to an outlet concentration not exceeding 9 ppmv via scrubbing. [District Rules 2201, 4406, and 4320]
- Whenever the unit is switched to scrubbed operation, compliance source testing for SO<sub>x</sub> shall be conducted within 60 days of initial scrubbing date unless source testing under scrubbed operation has occurred within the previous 12 months. [District Rules 2201 and 4320]

## **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.

CUSA 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 or shutdown shall not exceed two hours each per occurrence. The emissions control system shall be in operation and emissions shall be minimized insofar as technologically possible during startup and shutdown. [District Rules 4305, 4306, and 4320]
- Permittee shall maintain records of duration of each start-up and shutdown. Startup is defined as the period of time to reach operating temperature and pressure once fuel is supplied, including the time required by the emission control system to reach full operation. Shutdown is defined as the period of time taken from operating temperature and pressure until the fuel supply is completely turned off. [District Rules 2201, 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<sub>x</sub>, CO and O<sub>2</sub>, or implement an APCO-approved alternate monitoring.

Consistent with current permit requirements, CUSA proposes to continue implementing Alternate Monitoring Scheme A (pursuant to District Policy SSP-1105), which requires that monitoring of NO<sub>x</sub>, CO, and O<sub>2</sub> 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:

- {2935} The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320]
- {2936} If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320]
- {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]
- {2938} The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 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. Operators complying with Section 5.4.1.3 are required

to perform an annual source test for SO<sub>x</sub> emissions. Therefore the following conditions will be listed on the permits:

S-1131-62, '-63, '-64, '-65, '-66, '-67, '-68, '-69, '-70, '-73, '-912, '-976, '-1002 (1 grain sulfur limit):

- Permittee shall submit an analysis to the District demonstrating compliance with the fuel sulfur content and higher heating value within 60 days of startup and at least once every 12 months. The sulfur content and higher heating value of the fuel shall be determined using the test methods referenced in this permit or certified by a third party fuel supplier. [District Rule 4320]

S-1131-77, '-78, '-94, '-858, '-877, '-879, '-880, '-881, '-883, '-884, '-908, '-941, '-943, '-966, '-987, '-992, '-993, '-994, '-997, '-998, '-999, '-1000, '-1001, '-1003, '-1004, '-1016 (5 grain sulfur limit):

- Permittee shall submit an analysis to the District demonstrating compliance with the fuel sulfur content and higher heating value within 60 days of startup and at least once every 12 months. The sulfur content and higher heating value of the fuel shall be determined using the test methods referenced in this permit or certified by a third party fuel supplier [District Rule 4320]

S-1131-82, '-95, '-98, '-99, '-859 (operating a sulfur scrubber):

- A source test to demonstrate compliance with SO<sub>x</sub> emission limits shall be performed within 60 days of startup of this unit. An analysis of the fuel sulfur content shall be submitted for compliance with the SO<sub>x</sub> requirement in lieu of the source test for SO<sub>x</sub>. [District Rules 2201, 4305, 4306, and 4320]
- Whenever the unit is switched to scrubbed operation, compliance source testing for SO<sub>x</sub> shall be conducted within 60 days of initial scrubbing date unless source testing under scrubbed operation has occurred within the previous 12 months. [District Rules 2201 and 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:

- The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rule, 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<sub>x</sub> 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:

- {2983} 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 <sub>x</sub>	ppmv	EPA Method 7E or ARB Method 100
NO <sub>x</sub>	lb/MMBtu	EPA Method 19
CO	ppmv	EPA Method 10 or ARB Method 100
Stack Gas O <sub>2</sub>	%	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<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, NO<sub>x</sub> (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, stack gas velocities - EPA Method 2, stack gas moisture - EPA Method 4, PM<sub>10</sub> - EPA Method 5, SO<sub>x</sub> (lb/MMBtu) - EPA Method 6C or 8 or ARB Method 100, or fuel gas sulfur content analysis (as H<sub>2</sub>S) - EPA Method 11 or 15 or ASTM 6228 and (as total sulfur) - ASTM D1072, D3246, or D6228, or grab sample analysis by double GC for H<sub>2</sub>S and mercaptans or GC FPTD/TCD performed in the laboratory, fuel hhv (MMBtu) - ASTM D 1826 or D 1945 in conjunction with ASTM D 3588. [District Rules 1081, 2201, 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:

#### Units installing new burners:

- Source testing to measure NO<sub>x</sub> and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320]

#### All units:

- Source testing to measure NO<sub>x</sub> 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 2520, 9.3.2, 4305, 4306, and 4320]
- 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<sub>x</sub>, CO, and O<sub>2</sub> 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. CUSA 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 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 SO<sub>2</sub>, on a dry basis averaged over 15 consecutive minutes.

The worst case sulfur emissions for this project will result from the units limited to 5 gr-S/100 scf or 1.026 lb-SO<sub>x</sub>/MMBtu.

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:

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

$$\frac{1.026 \text{ lb} - \text{SO}_x}{\text{MMBtu}} \times \frac{\text{MMBtu}}{8,578 \text{ dscf}} \times \frac{1 \text{ lb} \cdot \text{mol}}{64 \text{ lb}} \times \frac{10.73 \text{ psi} \cdot \text{ft}^3}{\text{lb} \cdot \text{mol} \cdot ^\circ\text{R}} \times \frac{520^\circ\text{R}}{14.7 \text{ psi}} \times \frac{1,000,000 \cdot \text{parts}}{\text{million}} = 709 \frac{\text{parts}}{\text{million}}$$

$$\text{Sulfur Concentration} = 709 \frac{\text{parts}}{\text{million}} < 2,000 \text{ ppmv (or 0.2\%)}$$

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.

### **Greenhouse Gas (GHG) Significance Determination**

It is determined that no other agency has or will prepare an environmental review document for the project. Thus the District is the Lead Agency for this project.

The District's engineering evaluation (this document) demonstrates that the project would not result in an increase in project specific greenhouse gas emissions. The District therefore concludes that the project would have a less than cumulatively significant impact on global climate change.

### **District CEQA Findings**

The District is the Lead Agency for this project because there is no other agency with broader statutory authority over this project. 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. Issue Authorities to Construct subject to the permit conditions on the attached draft Authorities to Construct in Appendix C.

**X. BILLING INFORMATION**

<b>Annual Permit Fees</b>			
<b>Permit Number</b>	<b>Fee Schedule</b>	<b>Fee Description</b>	<b>Annual Fee</b>
All units (except those listed below)	3020-02-H	62.5 MMBtu/hr	\$1,030.00
S-1131-941	3020-02-H	27.5 MMBtu/hr	\$1,030.00
S-1131-966	3020-02-H	27.5 MMBtu/hr	\$1,030.00

**Appendices**

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

# Appendix A

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Current Base Documents

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1131-62-28

**EXPIRATION DATE:** 02/28/2007

**SECTION:** 05 **TOWNSHIP:** 29S **RANGE:** 28E

**EQUIPMENT DESCRIPTION:**

62.5 MMBTU/HR NATURAL GAS FIRED C.E. NATCO STEAM GENERATOR (HSG# 60-38; DIS# 20630-79) WITH FLUE GAS RECIRCULATION, NORTH AMERICAN MODEL GLE LOW-NOX BURNER, AND NORTH AMERICAN OPTIMIZER

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO<sub>2</sub>. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit
3. No less than 4.54 miles of roads shall be paved and maintained to provide particulate matter offsets for Project 62 and 95. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Only hot mix asphalt of a type conforming to Caltrans Standard Specifications shall be used in the paving or maintenance of roads used to provide particulate matter offsets for Project 62 and 95. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Emissions from the steam generator shall not exceed any of the following limits: 0.001 lb-SO<sub>x</sub>/MMBtu, 0.005 lb-PM<sub>10</sub>/MMBtu, or 0.007 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 15 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.0182 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rules 2201, 4301, 5.2, 4305, 5.1, 4306, 5.1, and 4351, 5.1] Federally Enforceable Through Title V Permit
7. During start-up and shutdown periods emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
8. During the initial "shakedown" period emissions from the steam generator shall not exceed any of the following limits: 30 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.036 lb-NO<sub>x</sub>/MMBtu, 0.001 lb-SO<sub>x</sub>/MMBtu, 0.005 lb-PM<sub>10</sub>/MMBtu, 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu, or 0.007 lb-VOC/MMBtu. [District Rules 2201] Federally Enforceable Through Title V Permit
9. During a shakedown period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO<sub>x</sub> emission rate shall not exceed 30 ppmvd @ 3% O<sub>2</sub> 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 Rules 4305, 5.5.6 and 4306, 5.3] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.25 and 3.22] Federally Enforceable Through Title V Permit
11. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 4305, 5.5.6 and 4306, 5.3] Federally Enforceable Through Title V Permit
12. Emissions from the steam generator shall not exceed either of the following limits: 54.0 lb-NOx/day or 55.5 lb-CO/day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Source testing to measure natural gas-combustion NOx 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, 6.3.1, 4306, 6.3.1, and 4351, 6.3.1] Federally Enforceable Through Title V Permit
14. Compliance demonstration (source testing) shall be conducted by independent testing laboratories and shall be witnessed, or authorized by the District. Sample collection shall be done by ARB certified testing laboratory. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. 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
16. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [County Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus)] Federally Enforceable Through Title V Permit
17. If the steam generator is fired on PUC-regulated natural gas, then the permittee shall maintain on file copies of all natural gas bills or fuel throughput records for a period of five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
18. If the steam generator is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the engine shall be determined using ASTM D 1072, D 3031, D 4084, D 3246, double GC for H2S and mercaptans, or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
19. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2; 4305, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit
20. If the steam generator is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that 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 quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
21. 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, 6A, 6B, 6C; or Method 8 or ARB Method 1-100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by GC-FPD/TCD performed in the laboratory and EPA Method 19 to calculated emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months, however annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.3.2] 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.

22. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period [Kern County Rule 407]. To demonstrate compliance with this requirement the operator shall do one of the following: fire the unit only on PUC or FERC regulated natural gas or test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
23. Nitrogen oxide (NOx) emissions shall not exceed 140 lb/hr, calculated as NO<sub>2</sub>. [District Rules 4301, 5.2.2 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
24. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
25. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
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, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
27. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, NO<sub>x</sub> (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or ARB Method 100, and stack gas oxygen - EPA Method 3 or 3A or ARB Method 100. [District Rules 1081, 4305 and 4351] 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, 5.5.1 and 4306, 5.5.1] 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
30. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5.5 and 4306, 5.5.5] Federally Enforceable Through Title V Permit
31. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

32. Annual test results submitted to the District from unit(s) representing a group of units may be used to measure NO<sub>x</sub> and CO emissions of this permit for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NO<sub>x</sub> emission limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. (This requirement shall not supersede a more stringent NSR or PSD permit testing requirement.) [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
33. The following conditions must be met for representative unit(s) to be used to test for NO<sub>x</sub> and CO limits for a group of units: 1) all units are initially source tested and emissions from each unit in group are less than 90% of the permitted value and vary 25% or less from the average of all runs, 2) all units in group are similar in terms of rated heat input (rating not to exceed 100 MMBtu/hr), make and series, operation conditions, and control method, and 3) the group is owned by a single owner and located at a single stationary source. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
34. All units in a group for which representative units are source tested for NO<sub>x</sub> and CO emissions shall have received the same maintenance and tune-up procedures as the representative unit(s). [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
35. All units in a group for which representative units are source tested for NO<sub>x</sub> and CO emissions of this permit shall be fired on the same fuel type during the entire compliance period. If a unit switches for any time to an alternate fuel type then that unit shall not be considered part of the group and shall be required to undergo a source test for all fuel types used, within one year of the switch. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
36. The number of representative units source tested for NO<sub>x</sub> and CO emissions shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that in 3 years, all units in the entire group will have been tested at least once. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
37. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
38. Permittee shall maintain daily records of volume of natural gas burned and vapor recovery system gas incinerated. [District NSR Rule] Federally Enforceable Through Title V Permit
39. Copies of all gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any non-certified fuel. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
40. 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, 6.1, and 4306, 6.1] Federally Enforceable Through Title V Permit
41. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of District Rules 4201, 4301 and 4801. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
42. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c 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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1131-63-23

**EXPIRATION DATE:** 02/28/2007

**SECTION:** 05 **TOWNSHIP:** 29S **RANGE:** 28E

**EQUIPMENT DESCRIPTION:**

62.5 MMBTU/HR NATURAL GAS-FIRED C.E. NATCO STEAM GENERATOR (HSG#60-39, DIS#20631-79) WITH NORTH AMERICAN GLE LOW-NOX BURNER, FLUE GAS RECIRCULATION (SAN JOAQUIN LOWER)

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO<sub>2</sub>. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit
3. No less than 4.54 miles of roads shall be paved and maintained to provide particulate matter offsets for Project 62 and 95. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Only hot mix asphalt of a type conforming to Caltrans Standard Specifications shall be used in the paving or maintenance of roads used to provide particulate matter offsets for Project 62 and 95. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Emissions from the steam generator shall not exceed any of the following limits: 0.001 lb-SO<sub>x</sub>/MMBtu, 0.005 lb-PM<sub>10</sub>/MMBtu, or 0.006 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 15 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.0182 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rules 2201, 4301, 5.2, 4305, 5.1, 4306, 5.1, and 4351, 5.1] Federally Enforceable Through Title V Permit
7. During start-up and shutdown periods, emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
8. During the initial "shakedown" period emissions from the steam generator shall not exceed any of the following limits: 30 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.036 lb-NO<sub>x</sub>/MMBtu, 0.001 lb-SO<sub>x</sub>/MMBtu, 0.005 lb-PM<sub>10</sub>/MMBtu, 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu, or 0.006 lb-VOC/MMBtu. [District Rules 2201] Federally Enforceable Through Title V Permit
9. During a shakedown period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO<sub>x</sub> emission rate shall not exceed 30 ppmvd @ 3% O<sub>2</sub> 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 Rules 4305, 5.5.6 and 4306, 5.3] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.25 and 3.22] Federally Enforceable Through Title V Permit
11. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 4305, 5.5.6 and 4306, 5.3] Federally Enforceable Through Title V Permit
12. Emissions from the steam generator shall not exceed either of the following limits: 54.0 lb-NO<sub>x</sub>/day or 55.5 lb-CO/day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Source testing to measure natural gas-combustion NO<sub>x</sub> 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, 6.3.1, 4306, 6.3.1, and 4351, 6.3.1] Federally Enforceable Through Title V Permit
14. Compliance demonstration (source testing) shall be conducted by independent testing laboratories and shall be witnessed, or authorized by the District. Sample collection shall be done by ARB certified testing laboratory. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. 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
16. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [County Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus)] Federally Enforceable Through Title V Permit
17. If the steam generator is fired on PUC-regulated natural gas, then the permittee shall maintain on file copies of all natural gas bills or fuel throughput records for a period of five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
18. If the steam generator is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the engine shall be determined using ASTM D 1072, D 3031, D 4084, D 3246, double GC for H<sub>2</sub>S and mercaptans, or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
19. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2; 4305, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit
20. If the steam generator is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that 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 quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
21. When complying with SO<sub>x</sub> emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6, 6A, 6B, 6C; or Method 8 or ARB Method 1-100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by GC-FPD/TCD performed in the laboratory and EPA Method 19 to calculated emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months, however annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.3.2] 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.

22. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period [Kern County Rule 407]. To demonstrate compliance with this requirement the operator shall do one of the following: fire the unit only on PUC or FERC regulated natural gas or test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
23. Nitrogen oxide (NOx) emissions shall not exceed 140 lb/hr, calculated as NO2. [District Rules 4301, 5.2.2 and 2520, 9.3.2] 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, 5.4 and 4306, 5.4] 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, 5.4 and 4306, 5.4] 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, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
27. 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 ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, stack gas moisture content - EPA Method 4, stack gas velocities - EPA Method 2, and fuel gas sulfur content - ASTM D3246 or double GC for H2S and mercaptans. [District Rules 4305, 6.2 and 4306, 6.2] 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, 5.5.1 and 4306, 5.5.1] 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
30. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5.5 and 4306, 5.5.5] Federally Enforceable Through Title V Permit
31. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

32. Annual test results submitted to the District from unit(s) representing a group of units may be used to measure NO<sub>x</sub> and CO emissions of this permit for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NO<sub>x</sub> or CO emission limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. (This requirement shall not supersede a more stringent NSR or PSD permit testing requirement.) [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
33. The following conditions must be met for representative unit(s) to be used to test for NO<sub>x</sub> and CO limits for a group of units: 1) all units are initially source tested and emissions from each unit in group are less than 90% of the permitted value and vary 25% or less from the average of all runs, 2) all units in group are similar in terms of rated heat input (rating not to exceed 100 MMBtu/hr), make and series, operation conditions, and control method, and 3) the group is owned by a single owner and located at a single stationary source. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
34. All units in a group for which representative units are source tested for NO<sub>x</sub> and CO emissions shall have received the same maintenance and tune-up procedures as the representative unit(s). [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
35. All units in a group for which representative units are source tested for NO<sub>x</sub> and CO emissions of this permit shall be fired on the same fuel type during the entire compliance period. If a unit switches for any time to an alternate fuel type then that unit shall not be considered part of the group and shall be required to undergo a source test for all fuel types used, within one year of the switch. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
36. The number of representative units source tested for NO<sub>x</sub> and CO emissions shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that in 3 years, all units in the entire group will have been tested at least once. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
37. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
38. Copies of all gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any non-certified fuel. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
39. 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, 6.1, and 4306, 6.1] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of District Rules 4201, 4301 and 4801. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c 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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1131-64-23

**EXPIRATION DATE:** 02/28/2007

**SECTION:** 05 **TOWNSHIP:** 29S **RANGE:** 28E

**EQUIPMENT DESCRIPTION:**

62.5 MMBTU/HR NATURAL GAS-FIRED C.E. NATCO STEAM GENERATOR (HSG# 60-40; DIS# 20632-79) WITH FLUE GAS RECIRCULATION, NORTH AMERICAN GLE LOW-NOX BURNER AND NORTH AMERICAN OPTIMIZER.

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO<sub>2</sub>. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit
3. No less than 4.54 miles of roads shall be paved and maintained to provide particulate matter offsets for Project 62 and 95. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Only hot mix asphalt of a type conforming to Caltrans Standard Specifications shall be used in the paving or maintenance of roads used to provide particulate matter offsets for Project 62 and 95. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Emissions from the steam generator shall not exceed any of the following limits: 0.001 lb-SO<sub>x</sub>/MMBtu, 0.005 lb-PM<sub>10</sub>/MMBtu, or 0.006 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 15 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.0182 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rules 2201, 4301, 5.2, 4305, 5.1, 4306, 5.1, and 4351, 5.1] Federally Enforceable Through Title V Permit
7. During start-up and shutdown periods, emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
8. During the initial "shakedown" period emissions from the steam generator shall not exceed any of the following limits: 30 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.036 lb-NO<sub>x</sub>/MMBtu, 0.001 lb-SO<sub>x</sub>/MMBtu, 0.005 lb-PM<sub>10</sub>/MMBtu, 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu, or 0.006 lb-VOC/MMBtu. [District Rules 2201] Federally Enforceable Through Title V Permit
9. During a shakedown period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NO<sub>x</sub> emission rate shall not exceed 30 ppmvd @ 3% O<sub>2</sub> 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 Rules 4305, 5.5.6 and 4306, 5.3] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.25 and 3.22] Federally Enforceable Through Title V Permit
11. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 4305, 5.5.6 and 4306, 5.3] Federally Enforceable Through Title V Permit
12. Emissions from the steam generator shall not exceed either of the following limits: 54.0 lb-NOx/day or 55.5 lb-CO/day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Source testing to measure natural gas-combustion NOx 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, 6.3.1, 4306, 6.3.1, and 4351, 6.3.1] Federally Enforceable Through Title V Permit.
14. Compliance demonstration (source testing) shall be conducted by independent testing laboratories and shall be witnessed, or authorized by the District. Sample collection shall be done by ARB certified testing laboratory. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. 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
16. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [County Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus)] Federally Enforceable Through Title V Permit
17. If the steam generator is fired on PUC-regulated natural gas, then the permittee shall maintain on file copies of all natural gas bills or fuel throughput records for a period of five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
18. If the steam generator is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the engine shall be determined using ASTM D 1072, D 3031, D 4084, D 3246, double GC for H2S and mercaptans, or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
19. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2; 4305, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit
20. If the steam generator is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that 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 quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
21. 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, 6A, 6B, 6C; or Method 8 or ARB Method 1-100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by GC-FPD/TCD performed in the laboratory and EPA Method 19 to calculated emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months, however annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.3.2] 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.

22. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period [Kern County Rule 407]. To demonstrate compliance with this requirement the operator shall do one of the following: fire the unit only on PUC or FERC regulated natural gas or test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
23. Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 140 lb/hr, calculated as NO<sub>2</sub>. [District Rules 4301, 5.2.2 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
24. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
25. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
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, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
27. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, NO<sub>x</sub> (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, stack gas moisture content - EPA Method 4, stack gas velocities - EPA Method 2, and fuel gas sulfur content - ASTM D3246 or double GC for H<sub>2</sub>S and mercaptans. [District Rules 4305, 6.2 and 4306, 6.2] 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, 5.5.1 and 4306, 5.5.1] 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
30. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5.5 and 4306, 5.5.5] Federally Enforceable Through Title V Permit
31. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

32. Annual test results submitted to the District from unit(s) representing a group of units may be used to measure NO<sub>x</sub> and CO emissions of this permit for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NO<sub>x</sub> or CO emission limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. (This requirement shall not supersede a more stringent NSR or PSD permit testing requirement.) [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
33. The following conditions must be met for representative unit(s) to be used to test for NO<sub>x</sub> and CO limits for a group of units: 1) all units are initially source tested and emissions from each unit in group are less than 90% of the permitted value and vary 25% or less from the average of all runs, 2) all units in group are similar in terms of rated heat input (rating not to exceed 100 MMBtu/hr), make and series, operation conditions, and control method, and 3) the group is owned by a single owner and located at a single stationary source. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
34. All units in a group for which representative units are source tested for NO<sub>x</sub> and CO emissions shall have received the same maintenance and tune-up procedures as the representative unit(s). [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
35. All units in a group for which representative units are source tested for NO<sub>x</sub> and CO emissions of this permit shall be fired on the same fuel type during the entire compliance period. If a unit switches for any time to an alternate fuel type then that unit shall not be considered part of the group and shall be required to undergo a source test for all fuel types used, within one year of the switch. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
36. The number of representative units source tested for NO<sub>x</sub> and CO emissions shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that in 3 years, all units in the entire group will have been tested at least once. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
37. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
38. Copies of all gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any non-certified fuel. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
39. 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, 6.1, and 4306, 6.1] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of District Rules 4201, 4301 and 4801. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c 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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1131-65-24

**EXPIRATION DATE:** 02/28/2007

**SECTION:** 05 **TOWNSHIP:** 29S **RANGE:** 28E

**EQUIPMENT DESCRIPTION:**

DORMANT 62.5 MMBTU/HR NATURAL GAS-FIRED C.E. NATCO STEAM GENERATOR (HSG# 60-41; DIS# 20633-79) WITH FLUE GAS RECIRCULATION, NORTH AMERICAN, MODEL #5131-HGCR-62.5, BURNER AND NORTH AMERICAN OPTIMIZER (SAN JOAQUIN LOWER)

## PERMIT UNIT REQUIREMENTS

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1. No modification to this unit shall be performed without an Authority to Construct for such modification(s), except for changes specified in conditions below. [District Rules 2210, 4305 and 4306] Federally Enforceable Through Title V Permit
2. The fuel supply line shall be physically disconnected from this unit. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
3. This equipment shall not be operated for any reason until an Authority to Construct permit is issued approving all necessary retrofits required to comply with the applicable requirements of District Rule 4306 and all other applicable District regulations. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
4. The stack concentration of NO<sub>x</sub> (as NO<sub>2</sub>), CO and O<sub>2</sub> shall be measured at least on a monthly basis using District approved portable analyzers in any calendar month in which the unit operates. [District Rules 2520, 9.3.2 and 4305] Federally Enforceable Through Title V Permit
5. The permittee shall maintain records of the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, the measured NO<sub>2</sub> and CO concentrations corrected to 3% O<sub>2</sub> and the O<sub>2</sub> concentration. The records shall also include a description of any corrective action taken to maintain the emissions in the acceptable range. These records shall be retained at the facility for a period of no less than five years and shall be made readily available for district inspection upon request. [District Rules 2520, 9.3.2 and 4305] Federally Enforceable Through Title V Permit
6. If the NO<sub>x</sub> or CO concentrations, as measured by the portable analyzer, exceed the permitted emission limits, the permittee or third party shall notify the District and return the NO<sub>x</sub> and CO concentrations to the permitted emission limits as soon as possible but no longer than one (1) hour after detection. If the portable analyzer readings continue to exceed the permitted emission limits after one (1) hour, the permittee shall conduct a source test within 60 days, of the first exceedance to demonstrate compliance with the permitted emission limits. [District Rules 2520, 9.3.2 and 4305] Federally Enforceable Through Title V Permit
7. Emission rates shall not exceed the following PM<sub>10</sub>: 0.005 lb/MMBtu, SO<sub>x</sub> (as SO<sub>2</sub>): 0.001 lb/MMBtu, NO<sub>x</sub> (as NO<sub>2</sub>): 0.036 lb/MMBtu or 30 ppmv @ 3% O<sub>2</sub>, VOC: 0.006 lb/MMBtu, and CO: 0.029 lb/MMBtu or 39 ppmv @ 3% O<sub>2</sub>. [District NSR Rule, Rules 4305, and 4351] Federally Enforceable Through Title V Permit
8. Source testing to demonstrate compliance with NO<sub>x</sub> and CO emission limits shall be conducted not less than once every 12 months, except as provided below. [District Rules 2201, 4305, 4306, and 4351] Federally Enforceable Through Title V Permit
9. Source testing to demonstrate compliance with NO<sub>x</sub> and CO emission limits shall be conducted not less than once every 36 months if compliance is demonstrated on two consecutive annual tests. [District Rules 4305 and 4351] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. If permittee fails any compliance demonstration for NO<sub>x</sub> and CO emission limits when testing not less than once every 36 months, compliance with NO<sub>x</sub> and CO emission limits shall be demonstrated not less than once every 12 months. [District Rules 4305 and 4351] Federally Enforceable Through Title V Permit
11. Compliance demonstration (source testing) shall be conducted by independent testing laboratories and shall be witnessed, or authorized by the District. Sample collection shall be done by ARB certified testing laboratory. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. 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
13. 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
14. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, NO<sub>x</sub> (lb/MMBtu) - EPA Method 19, CO (ppmv) - EPA Method 10 or ARB Method 100, and stack gas oxygen - EPA Method 3 or 3A or ARB Method 100. [District Rules 1081, 4305 and 4351] Federally Enforceable Through Title V Permit
15. No less than 4.54 miles of roads shall be paved and maintained to provide particulate matter offsets for Project 62 and 95. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Only hot mix asphalt of a type conforming to Caltrans Standard Specifications shall be used in the paving or maintenance of roads used to provide particulate matter offsets for Project 62 and 95. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Copies of all gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
18. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO<sub>2</sub>, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3 and Kern County Rules 404 and 408] Federally Enforceable Through Title V Permit
19. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO<sub>2</sub>. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit
20. 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, 9.3.2] Federally Enforceable Through Title V Permit
21. When complying with SO<sub>x</sub> emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6, 6A, 6B, 6C; or Method 8 or ARB Method 1-100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by GC-FPD/TCD performed in the laboratory and EPA Method 19 to calculated emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months, however annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
22. If the unit is fired on noncertified gaseous fuel and compliance with SO<sub>x</sub> emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] 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.

23. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2; 4305, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit
24. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period [Kern County Rule 407]. To demonstrate compliance with this requirement the operator shall do one of the following: fire the unit only on PUC or FERC regulated natural gas or test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
25. Nitrogen oxide (NOx) emissions shall not exceed 140 lb/hr, calculated as NO<sub>2</sub>. [District Rules 4301, 5.2.2 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
26. Emissions for this unit shall be calculated using the arithmetic mean, pursuant to District Rule 1081 (Amended December 16, 1993), of 3 thirty-minute test runs for NOx and CO. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
27. Annual test results submitted to the District from unit(s) representing a group of units may be used to measure NOx and CO emissions of this permit for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NOx emission limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. (This requirement shall not supersede a more stringent NSR or PSD permit testing requirement.) [District Rules 4305, 6.3.2 and 4351, 6.3] Federally Enforceable Through Title V Permit
28. The following conditions must be met for representative unit(s) to be used to test for NOx and CO limits for a group of units: 1) all units are initially source tested and emissions from each unit in group are less than 90% of the permitted value and vary 25% or less from the average of all runs, 2) all units in group are similar in terms of rated heat input (rating not to exceed 100 MMBtu/hr), make and series, operation conditions, and control method, and 3) the group is owned by a single owner and located at a single stationary source. [District Rule 2520, 9.3.2 and 4305, 6.3.2] Federally Enforceable Through Title V Permit
29. All units in a group for which representative units are source tested for NOx and CO emissions shall have received the same maintenance and tune-up procedures as the representative unit(s). [District Rules 2520, 9.3.2 and 4305, 6.3.2] Federally Enforceable Through Title V Permit
30. All units in a group for which representative units are source tested to for NOx and CO emissions of this permit shall be fired on the same fuel type during the entire compliance period. If a unit switches for any time to an alternate fuel type (e.g. from natural gas to oil) then that unit shall not be considered part of the group and shall be required to undergo a source test for all fuel types used, within one year of the switch. [District Rules 2520, 9.3.2 and 4305, 6.3.2] Federally Enforceable Through Title V Permit
31. The number of representative units source tested for NOx and CO emissions shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that in 3 years, all units in the entire group will have been tested at least once. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
32. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of District Rules 4201, 4301 and 4801. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
33. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c 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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1131-66-22

**EXPIRATION DATE:** 02/28/2007

**SECTION:** 05 **TOWNSHIP:** 29S **RANGE:** 28E

**EQUIPMENT DESCRIPTION:**

62.5 MMBTU/HR NATURAL GAS-FIRED C.E. NATCO STEAM GENERATOR (HSG# 60-42; DIS# 20634-79) WITH FLUE GAS RECIRCULATION, NORTH AMERICAN GLE LOW-NOX BURNER AND NORTH AMERICAN OPTIMIZER. (SAN JOAQUIN LOWER)

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. No less than 4.54 miles of roads shall be paved and maintained to provide particulate matter offsets for Project 62 and 95. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Only hot mix asphalt of a type conforming to Caltrans Standard Specifications shall be used in the paving or maintenance of roads used to provide particulate matter offsets for Project 62 and 95. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Emissions from the steam generator shall not exceed any of the following limits: 0.001 lb-SO<sub>x</sub>/MMBtu, 0.005 lb-PM<sub>10</sub>/MMBtu, or 0.006 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 15 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.0182 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rules 2201, 4301, 5.2, 4305, 5.1, 4306, 5.1, and 4351, 5.1] Federally Enforceable Through Title V Permit
6. During start-up and shutdown periods, emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.25 and 3.22] Federally Enforceable Through Title V Permit
8. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 4305, 5.5.6 and 4306, 5.3] Federally Enforceable Through Title V Permit
9. Emissions from the steam generator shall not exceed either of the following limits: 54.0 lb-NO<sub>x</sub>/day or 55.5 lb-CO/day. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. Source testing to measure natural gas-combustion NO<sub>x</sub> 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, 6.3.1, 4306, 6.3.1, and 4351, 6.3.1] Federally Enforceable Through Title V Permit
11. 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
12. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [County Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus)] Federally Enforceable Through Title V Permit
13. If the steam generator is fired on PUC-regulated natural gas, then the permittee shall maintain on file copies of all natural gas bills or fuel throughput records for a period of five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
14. If the steam generator is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the engine shall be determined using ASTM D 1072, D 3031, D 4084, D 3246, double GC for H<sub>2</sub>S and mercaptans, or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. If the steam generator is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that 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 quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
17. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
18. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.4 and 4306, 5.4] 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.

19. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, NO<sub>x</sub> (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, stack gas moisture content - EPA Method 4, stack gas velocities - EPA Method 2, and fuel gas sulfur content - ASTM D3246 or double GC for H<sub>2</sub>S and mercaptans. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
20. 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
21. 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
22. 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
23. 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
24. Annual test results submitted to the District from unit(s) representing a group of units may be used to measure NO<sub>x</sub> and CO emissions of this permit for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NO<sub>x</sub> or CO emission limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. (This requirement shall not supersede a more stringent NSR or PSD permit testing requirement.) [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
25. The following conditions must be met for representative unit(s) to be used to test for NO<sub>x</sub> and CO limits for a group of units: 1) all units are initially source tested and emissions from each unit in group are less than 90% of the permitted value and vary 25% or less from the average of all runs, 2) all units in group are similar in terms of rated heat input (rating not to exceed 100 MMBtu/hr), make and series, operation conditions, and control method, and 3) the group is owned by a single owner and located at a single stationary source. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
26. All units in a group for which representative units are source tested for NO<sub>x</sub> and CO emissions shall have received the same maintenance and tune-up procedures as the representative unit(s). [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
27. All units in a group for which representative units are source tested to for NO<sub>x</sub> and CO emissions of this permit shall be fired on the same fuel type during the entire compliance period. If a unit switches for any time to an alternate fuel type then that unit shall not be considered part of the group and shall be required to undergo a source test for all fuel types used, within one year of the switch. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
28. The number of representative units source tested for NO<sub>x</sub> and CO emissions shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that in 3 years, all units in the entire group will have been tested at least once. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
29. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

30. Copies of all gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any non-certified fuel. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
31. 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, 6.1, and 4306, 6.1] Federally Enforceable Through Title V Permit
32. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of District Rules 4201, 4301 and 4801. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
33. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c 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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1131-67-23

**EXPIRATION DATE:** 02/28/2007

**SECTION:** 05 **TOWNSHIP:** 29S **RANGE:** 28E

**EQUIPMENT DESCRIPTION:**

62.5 MMBTU/HR C.E. NATCO NATURAL GAS-FIRED STEAM GENERATOR (HSG# 60-43; DIS# 20635-79) WITH FLUE GAS RECIRCULATION AND A NORTH AMERICAN GLE LOW-NOX BURNER (SAN JOAQUIN LOWER)

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. No less than 4.54 miles of roads shall be paved and maintained to provide particulate matter offsets for Project 62 and 95. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Only hot mix asphalt of a type conforming to Caltrans Standard Specifications shall be used in the paving or maintenance of roads used to provide particulate matter offsets for Project 62 and 95. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Flue gas recirculation shall be utilized, as needed, in conjunction with low-NOx burner to maintain ongoing compliance with permitted emission limits. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Emissions from the steam generator shall not exceed any of the following limits: 0.001 lb-SOx/MMBtu, 0.005 lb-PM10/MMBtu, or 0.006 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 15 ppmvd NOx @ 3% O2 or 0.0182 lb-NOx/MMBtu or 50 ppmvd CO @ 3% O2 or 0.037 lb-CO/MMBtu. [District Rules 2201, 4301, 5.2, 4305, 5.1, 4306, 5.1, and 4351, 5.1] Federally Enforceable Through Title V Permit
7. During start-up and shutdown periods, emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.25 and 3.22] Federally Enforceable Through Title V Permit
9. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 4305, 5.5.6 and 4306, 5.3] Federally Enforceable Through Title V Permit
10. Emissions from the steam generator shall not exceed either of the following limits: 54.0 lb-NOx/day or 55.5 lb-CO/day. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. Source testing to measure natural gas-combustion NO<sub>x</sub> 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, 6.3.1, 4306, 6.3.1, and 4351, 6.3.1] Federally Enforceable Through Title V Permit
12. 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
13. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO<sub>2</sub>. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit
14. Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 140 lb/hr, calculated as NO<sub>2</sub>. [District Rules 4301, 5.2.2 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period [Kern County Rule 407]. To demonstrate compliance with this requirement the operator shall do one of the following: fire the unit only on PUC or FERC regulated natural gas or test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. If the steam generator is fired on PUC-regulated natural gas, then the permittee shall maintain on file copies of all natural gas bills or fuel throughput records for a period of five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
17. If the steam generator is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the engine shall be determined using ASTM D 1072, D 3031, D 4084, D 3246, double GC for H<sub>2</sub>S and mercaptans, or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
18. If the steam generator is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that 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 quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
19. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit

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

20. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
21. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
22. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, NO<sub>x</sub> (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, stack gas moisture content - EPA Method 4, stack gas velocities - EPA Method 2, and fuel gas sulfur content - ASTM D3246 or double GC for H<sub>2</sub>S and mercaptans. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
23. 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
24. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 5.5.2 and 4306, 5.5.2] Federally Enforceable Through Title V Permit
25. 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
26. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
27. Annual test results submitted to the District from unit(s) representing a group of units may be used to measure NO<sub>x</sub> and CO emissions of this permit for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NO<sub>x</sub> or CO emission limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. (This requirement shall not supersede a more stringent NSR or PSD permit testing requirement.) [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
28. The following conditions must be met for representative unit(s) to be used to test for NO<sub>x</sub> and CO limits for a group of units: 1) all units are initially source tested and emissions from each unit in group are less than 90% of the permitted value and vary 25% or less from the average of all runs, 2) all units in group are similar in terms of rated heat input (rating not to exceed 100 MMBtu/hr), make and series, operation conditions, and control method, and 3) the group is owned by a single owner and located at a single stationary source. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] 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.

29. All units in a group for which representative units are source tested for NO<sub>x</sub> and CO emissions shall have received the same maintenance and tune-up procedures as the representative unit(s). [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
30. All units in a group for which representative units are source tested to for NO<sub>x</sub> and CO emissions of this permit shall be fired on the same fuel type during the entire compliance period. If a unit switches for any time to an alternate fuel type then that unit shall not be considered part of the group and shall be required to undergo a source test for all fuel types used, within one year of the switch. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
31. The number of representative units source tested for NO<sub>x</sub> and CO emissions shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that in 3 years, all units in the entire group will have been tested at least once. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
32. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
33. Copies of all gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any non-certified fuel. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
34. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 6.1, and 4306, 6.1] Federally Enforceable Through Title V Permit
35. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of District Rules 4201, 4301 and 4801. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
36. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c 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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1131-68-22

**EXPIRATION DATE:** 02/28/2007

**SECTION:** 05 **TOWNSHIP:** 29S **RANGE:** 28E

**EQUIPMENT DESCRIPTION:**

62.5 MMBTU/HR C.E. NATCO NATURAL GAS-FIRED STEAM GENERATOR (HSG# 60-44; DIS# 20636-79) WITH FLUE GAS RECIRCULATION AND A NORTH AMERICAN GLE LOW-NOX BURNER (SAN JOAQUIN LOWER)

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. No less than 4.54 miles of roads shall be paved and maintained to provide particulate matter offsets for Project 62 and 95. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Only hot mix asphalt of a type conforming to Caltrans Standard Specifications shall be used in the paving or maintenance of roads used to provide particulate matter offsets for Project 62 and 95. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Flue gas recirculation shall be utilized, as needed, in conjunction with low-NOx burner to maintain ongoing compliance with permitted emission limits. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Emissions from the steam generator shall not exceed any of the following limits: 0.001 lb-SOx/MMBtu, 0.005 lb-PM10/MMBtu, or 0.006 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 15 ppmvd NOx @ 3% O2 or 0.0182 lb-NOx/MMBtu or 50 ppmvd CO @ 3% O2 or 0.037 lb-CO/MMBtu. [District Rules 2201, 4301, 5.2, 4305, 5.1, 4306, 5.1, and 4351, 5.1] Federally Enforceable Through Title V Permit
7. During start-up and shutdown periods, emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.25 and 3.22] Federally Enforceable Through Title V Permit
9. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 4305, 5.5.6 and 4306, 5.3] Federally Enforceable Through Title V Permit
10. Emissions from the steam generator shall not exceed either of the following limits: 54.0 lb-NOx/day or 55.5 lb-CO/day. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. Source testing to measure natural gas-combustion NO<sub>x</sub> 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, 6.3.1, 4306, 6.3.1, and 4351, 6.3.1] Federally Enforceable Through Title V Permit
12. 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
13. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO<sub>2</sub>. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit
14. Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 140 lb/hr, calculated as NO<sub>2</sub>. [District Rules 4301, 5.2.2 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period [Kern County Rule 407]. To demonstrate compliance with this requirement the operator shall do one of the following: fire the unit only on PUC or FERC regulated natural gas or test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. If the steam generator is fired on PUC-regulated natural gas, then the permittee shall maintain on file copies of all natural gas bills or fuel throughput records for a period of five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
17. If the steam generator is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the engine shall be determined using ASTM D 1072, D 3031, D 4084, D 3246, double GC for H<sub>2</sub>S and mercaptans, or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
18. If the steam generator is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that 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 quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
19. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit

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

20. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
21. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
22. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, NO<sub>x</sub> (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, stack gas moisture content - EPA Method 4, stack gas velocities - EPA Method 2, and fuel gas sulfur content - ASTM D3246 or double GC for H<sub>2</sub>S and mercaptans. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
23. 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
24. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 5.5.2 and 4306, 5.5.2] Federally Enforceable Through Title V Permit
25. 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
26. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
27. Annual test results submitted to the District from unit(s) representing a group of units may be used to measure NO<sub>x</sub> and CO emissions of this permit for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NO<sub>x</sub> or CO emission limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. (This requirement shall not supersede a more stringent NSR or PSD permit testing requirement.) [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
28. The following conditions must be met for representative unit(s) to be used to test for NO<sub>x</sub> and CO limits for a group of units: 1) all units are initially source tested and emissions from each unit in group are less than 90% of the permitted value and vary 25% or less from the average of all runs, 2) all units in group are similar in terms of rated heat input (rating not to exceed 100 MMBtu/hr), make and series, operation conditions, and control method, and 3) the group is owned by a single owner and located at a single stationary source. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] 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.

29. All units in a group for which representative units are source tested for NO<sub>x</sub> and CO emissions shall have received the same maintenance and tune-up procedures as the representative unit(s). [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
30. All units in a group for which representative units are source tested to for NO<sub>x</sub> and CO emissions of this permit shall be fired on the same fuel type during the entire compliance period. If a unit switches for any time to an alternate fuel type then that unit shall not be considered part of the group and shall be required to undergo a source test for all fuel types used, within one year of the switch. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
31. The number of representative units source tested for NO<sub>x</sub> and CO emissions shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that in 3 years, all units in the entire group will have been tested at least once. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
32. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
33. Copies of all gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any non-certified fuel. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
34. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 6.1, and 4306, 6.1] Federally Enforceable Through Title V Permit
35. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of District Rules 4201, 4301 and 4801. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
36. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c 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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1131-69-22

**EXPIRATION DATE:** 02/28/2007

**SECTION:** 05 **TOWNSHIP:** 29S **RANGE:** 28E

**EQUIPMENT DESCRIPTION:**

62.5 MMBTU/HR NATURAL GAS-FIRED C.E. NATCO STEAM GENERATOR (HSG# 60-45; DIS# 20637-79) WITH FLUE GAS RECIRCULATION, NORTH AMERICAN GLE LOW-NOX BURNER AND NORTH AMERICAN OPTIMIZER. (SAN JOAQUIN LOWER)

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. No less than 4.54 miles of roads shall be paved and maintained to provide particulate matter offsets for Project 62 and 95. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Only hot mix asphalt of a type conforming to Caltrans Standard Specifications shall be used in the paving or maintenance of roads used to provide particulate matter offsets for Project 62 and 95. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Emissions from the steam generator shall not exceed any of the following limits: 0.001 lb-SO<sub>x</sub>/MMBtu, 0.005 lb-PM<sub>10</sub>/MMBtu, or 0.006 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 15 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.0182 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rules 2201, 4301, 5.2, 4305, 5.1, 4306, 5.1, and 4351, 5.1] Federally Enforceable Through Title V Permit
6. During start-up and shutdown periods, emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 4305, 5.5.6 and 4306, 5.3] Federally Enforceable Through Title V Permit
8. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.25 and 3.22] Federally Enforceable Through Title V Permit
9. Emissions from the steam generator shall not exceed either of the following limits: 54.0 lb-NO<sub>x</sub>/day or 55.5 lb-CO/day. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. Source testing to measure natural gas-combustion NO<sub>x</sub> 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, 6.3.1, 4306, 6.3.1, and 4351, 6.3.1] Federally Enforceable Through Title V Permit
11. 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
12. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [County Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus)] Federally Enforceable Through Title V Permit
13. If the steam generator is fired on PUC-regulated natural gas, then the permittee shall maintain on file copies of all natural gas bills or fuel throughput records for a period of five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
14. If the steam generator is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the engine shall be determined using ASTM D 1072, D 3031, D 4084, D 3246, double GC for H<sub>2</sub>S and mercaptans, or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. If the steam generator is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that 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 quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
17. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
18. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.4 and 4306, 5.4] 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.

19. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, NO<sub>x</sub> (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, stack gas moisture content - EPA Method 4, stack gas velocities - EPA Method 2, and fuel gas sulfur content - ASTM D3246 or double GC for H<sub>2</sub>S and mercaptans. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
20. 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
21. 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
22. 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
23. 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
24. Annual test results submitted to the District from unit(s) representing a group of units may be used to measure NO<sub>x</sub> and CO emissions of this permit for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NO<sub>x</sub> or CO emission limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. (This requirement shall not supersede a more stringent NSR or PSD permit testing requirement.) [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
25. The following conditions must be met for representative unit(s) to be used to test for NO<sub>x</sub> and CO limits for a group of units: 1) all units are initially source tested and emissions from each unit in group are less than 90% of the permitted value and vary 25% or less from the average of all runs, 2) all units in group are similar in terms of rated heat input (rating not to exceed 100 MMBtu/hr), make and series, operation conditions, and control method, and 3) the group is owned by a single owner and located at a single stationary source. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
26. All units in a group for which representative units are source tested for NO<sub>x</sub> and CO emissions shall have received the same maintenance and tune-up procedures as the representative unit(s). [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
27. All units in a group for which representative units are source tested to for NO<sub>x</sub> and CO emissions of this permit shall be fired on the same fuel type during the entire compliance period. If a unit switches for any time to an alternate fuel type then that unit shall not be considered part of the group and shall be required to undergo a source test for all fuel types used, within one year of the switch. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
28. The number of representative units source tested for NO<sub>x</sub> and CO emissions shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that in 3 years, all units in the entire group will have been tested at least once. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
29. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

30. Copies of all gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any non-certified fuel. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
31. 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, 6.1, and 4306, 6.1] Federally Enforceable Through Title V Permit
32. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of District Rules 4201, 4301 and 4801. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
33. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c 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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1131-70-22

**EXPIRATION DATE:** 02/28/2007

**SECTION:** 05 **TOWNSHIP:** 29S **RANGE:** 28E

**EQUIPMENT DESCRIPTION:**

62.5 MMBTU/HR NATURAL GAS-FIRED C.E. NATCO STEAM GENERATOR (HSG# 60-46; DIS# 20638-79) WITH A NORTH AMERICAN MAGNA FLAME GLE LOW-NOX BURNER AND FLUE GAS RECIRCULATION (SAN JOAQUIN LOWER)

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO<sub>2</sub>, nor 10 lb/hr. [District Rules 4201, 3.1; 4301, 5.1 and 5.2.3, and Kern County Rules 404 and 408] Federally Enforceable Through Title V Permit
2. No less than 4.54 miles of roads shall be paved and maintained to provide particulate matter offsets for Project 62 and 95. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Only hot mix asphalt of a type conforming to Caltrans Standard Specifications shall be used in the paving or maintenance of roads used to provide particulate matter offsets for Project 62 and 95. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Emissions from the steam generator shall not exceed any of the following limits: 0.001 lb-SO<sub>x</sub>/MMBtu, 0.005 lb-PM<sub>10</sub>/MMBtu, or 0.006 lb-VOC/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 15 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.0182 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District NSR Rule and District Rules 4301, 5.2; 4305, 5.1; 4306, 5.1; and 4351, 5.1] Federally Enforceable Through Title V Permit
6. During start-up and shutdown periods, emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.25 and 3.22] Federally Enforceable Through Title V Permit
8. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 4305, 5.5.6 and 4306, 5.3] Federally Enforceable Through Title V Permit
9. Emissions from the steam generator shall not exceed either of the following limits: 54.0 lb-NO<sub>x</sub>/day or 55.5 lb-CO/day. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 140 lb/hr, calculated as NO<sub>2</sub>. [District Rules 2520, 9.3.2 and 4301, 5.2.2] 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.

11. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Kern County Rule 407] Federally Enforceable Through Title V Permit
12. If the steam generator is fired on PUC-regulated natural gas, then the permittee shall maintain on file copies of all natural gas bills or fuel throughput records for a period of five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. If the steam generator is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the engine shall be determined using ASTM D1072, D4084, D3246, double GC for H<sub>2</sub>S and mercaptans, or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
14. If the steam generator is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that 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 quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
16. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
17. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
18. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
19. Source testing to measure natural gas-combustion NO<sub>x</sub> 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, 6.3.1, 4306, 6.3.1, and 4351, 6.3.1] Federally Enforceable Through Title V Permit
20. 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.

21. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, NO<sub>x</sub> (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, stack gas moisture content - EPA Method 4, stack gas velocities - EPA Method 2, and fuel gas sulfur content - ASTM D3246 or double GC for H<sub>2</sub>S and mercaptans. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
22. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5.1 and 4306, 5.5.1] Federally Enforceable Through Title V Permit
23. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 5.5.2 and 4306, 5.5.2] Federally Enforceable Through Title V Permit
24. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5.5 and 4306, 5.5.5] Federally Enforceable Through Title V Permit
25. 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
26. Annual test results submitted to the District from unit(s) representing a group of units may be used to measure NO<sub>x</sub> and CO emissions of this permit for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NO<sub>x</sub> or CO emission limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. (This requirement shall not supersede a more stringent NSR or PSD permit testing requirement.) [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
27. The following conditions must be met for representative unit(s) to be used to test for NO<sub>x</sub> and CO limits for a group of units: 1) all units are initially source tested and emissions from each unit in group are less than 90% of the permitted value and vary 25% or less from the average of all runs, 2) all units in group are similar in terms of rated heat input (rating not to exceed 100 MMBtu/hr), make and series, operation conditions, and control method, and 3) the group is owned by a single owner and located at a single stationary source. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
28. All units in a group for which representative units are source tested for NO<sub>x</sub> and CO emissions shall have received the same maintenance and tune-up procedures as the representative unit(s). [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
29. All units in a group for which representative units are source tested to for NO<sub>x</sub> and CO emissions of this permit shall be fired on the same fuel type during the entire compliance period. If a unit switches for any time to an alternate fuel type then that unit shall not be considered part of the group and shall be required to undergo a source test for all fuel types used, within one year of the switch. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
30. The number of representative units source tested for NO<sub>x</sub> and CO emissions shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that in 3 years, all units in the entire group will have been tested at least once. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
31. Copies of all gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any non-certified fuel. [District Rule 2520, 9.3.2] 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.

32. 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, 6.1, and 4306, 6.1] Federally Enforceable Through Title V Permit
33. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of District Rules 4201, 4301 and 4801. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
34. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c 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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1131-73-22

**EXPIRATION DATE:** 02/28/2007

**SECTION:** 05 **TOWNSHIP:** 29S **RANGE:** 28E

**EQUIPMENT DESCRIPTION:**

62.5 MMBTU/HR NATURAL GAS-FIRED C.E. NATCO STEAM GENERATOR (HSG# 60-49; DIS# 20641-79) WITH A NORTH AMERICAN MAGNA FLAME GLE LOW-NOX BURNER AND FLUE GAS RECIRCULATION (SAN JOAQUIN LOWER)

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO<sub>2</sub>, nor 10 lb/hr. [District Rules 4201, 3.1; 4301, 5.1 and 5.2.3, and Kern County Rules 404 and 408] Federally Enforceable Through Title V Permit
2. No less than 4.54 miles of roads shall be paved and maintained to provide particulate matter offsets for Project 62 and 95. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Only hot mix asphalt of a type conforming to Caltrans Standard Specifications shall be used in the paving or maintenance of roads used to provide particulate matter offsets for Project 62 and 95. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Emissions from the steam generator shall not exceed any of the following limits: 0.001 lb-SO<sub>x</sub>/MMBtu, 0.005 lb-PM<sub>10</sub>/MMBtu, or 0.006 lb-VOC/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 15 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.0182 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District NSR Rule and District Rules 4301, 5.2; 4305, 5.1; 4306, 5.1; and 4351, 5.1] Federally Enforceable Through Title V Permit
6. During start-up and shutdown periods, emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.25 and 3.22] Federally Enforceable Through Title V Permit
8. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 4305, 5.5.6 and 4306, 5.3] Federally Enforceable Through Title V Permit
9. Emissions from the steam generator shall not exceed either of the following limits: 54.0 lb-NO<sub>x</sub>/day or 55.5 lb-CO/day. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 140 lb/hr, calculated as NO<sub>2</sub>. [District Rules 2520, 9.3.2 and 4301, 5.2.2] 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.

11. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Kern County Rule 407] Federally Enforceable Through Title V Permit
12. If the steam generator is fired on PUC-regulated natural gas, then the permittee shall maintain on file copies of all natural gas bills or fuel throughput records for a period of five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. If the steam generator is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the engine shall be determined using ASTM D1072, D4084, D3246, double GC for H<sub>2</sub>S and mercaptans, or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
14. If the steam generator is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that 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 quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
16. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
17. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
18. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
19. Source testing to measure natural gas-combustion NO<sub>x</sub> 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, 6.3.1, 4306, 6.3.1, and 4351, 6.3.1] Federally Enforceable Through Title V Permit
20. 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.

21. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, NO<sub>x</sub> (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, stack gas moisture content - EPA Method 4, stack gas velocities - EPA Method 2, and fuel gas sulfur content - ASTM D3246 or double GC for H<sub>2</sub>S and mercaptans. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
22. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5.1 and 4306, 5.5.1] Federally Enforceable Through Title V Permit
23. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 5.5.2 and 4306, 5.5.2] Federally Enforceable Through Title V Permit
24. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5.5 and 4306, 5.5.5] Federally Enforceable Through Title V Permit
25. 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
26. Annual test results submitted to the District from unit(s) representing a group of units may be used to measure NO<sub>x</sub> and CO emissions of this permit for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NO<sub>x</sub> or CO emission limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. (This requirement shall not supersede a more stringent NSR or PSD permit testing requirement.) [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
27. The following conditions must be met for representative unit(s) to be used to test for NO<sub>x</sub> and CO limits for a group of units: 1) all units are initially source tested and emissions from each unit in group are less than 90% of the permitted value and vary 25% or less from the average of all runs, 2) all units in group are similar in terms of rated heat input (rating not to exceed 100 MMBtu/hr), make and series, operation conditions, and control method, and 3) the group is owned by a single owner and located at a single stationary source. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
28. All units in a group for which representative units are source tested for NO<sub>x</sub> and CO emissions shall have received the same maintenance and tune-up procedures as the representative unit(s). [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
29. All units in a group for which representative units are source tested to for NO<sub>x</sub> and CO emissions of this permit shall be fired on the same fuel type during the entire compliance period. If a unit switches for any time to an alternate fuel type then that unit shall not be considered part of the group and shall be required to undergo a source test for all fuel types used, within one year of the switch. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
30. The number of representative units source tested for NO<sub>x</sub> and CO emissions shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that in 3 years, all units in the entire group will have been tested at least once. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
31. Copies of all gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any non-certified fuel. [District Rule 2520, 9.3.2] 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.

32. 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, 6.1, and 4306, 6.1] Federally Enforceable Through Title V Permit
33. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of District Rules 4201, 4301 and 4801. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
34. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c 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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1131-77-24

**EXPIRATION DATE:** 02/28/2007

**SECTION:** 19 **TOWNSHIP:** 28S **RANGE:** 28E

**EQUIPMENT DESCRIPTION:**

NON-COMPLIANT DORMANT 62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS-FIRED C.E. NATCO STEAM GENERATOR (HSG# 60-67; DIS# 20611-79) WITH FLUE GAS RECIRCULATION, NORTH AMERICAN, MODEL #5131-HGCR-62. 5, BURNER AND NORTH AMERICAN OPTIMIZER. (CANFIELD LEASE)

## PERMIT UNIT REQUIREMENTS

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1. No modification to this unit shall be performed without an Authority to Construct for such modification(s), except for changes specified in conditions below. [District Rules 2201, 4305 and 4306] Federally Enforceable Through Title V Permit
2. The fuel supply line shall be physically disconnected from this unit. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
3. This equipment shall not be operated for any reason until an Authority to Construct permit is issued approving all necessary retrofits required to comply with the applicable requirements of District Rule 4306 and all other applicable District regulations. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
4. The stack concentration of NO<sub>x</sub> (as NO<sub>2</sub>), CO and O<sub>2</sub> shall be measured at least on a monthly basis using district approved portable analyzers in any calendar month in which the unit operates. [District Rules 2520, 9.3.2 and 4305] Federally Enforceable Through Title V Permit
5. The permittee shall maintain records of the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, the measured NO<sub>2</sub> and CO concentrations corrected to 3% O<sub>2</sub> and the O<sub>2</sub> concentration. The records shall also include a description of any corrective action taken to maintain the emissions in the acceptable range. These records shall be retained at the facility for a period of no less than five years and shall be made readily available for district inspection upon request. [District Rules 2520, 9.3.2 and 4305] Federally Enforceable Through Title V Permit
6. If the NO<sub>x</sub> or CO concentrations, as measured by the portable analyzer, exceed the permitted emission limits, the permittee or third party shall notify the District and return the NO<sub>x</sub> and CO concentrations to the permitted emission limits as soon as possible but no longer than one (1) hour after detection. If the portable analyzer readings continue to exceed the permitted emission limits after one (1) hour, the permittee shall conduct a source test within 60 days, of the first exceedance to demonstrate compliance with the permitted emission limits. [District Rules 2520, 9.3.2 and 4305] Federally Enforceable Through Title V Permit
7. Emission rates shall not exceed the following PM<sub>10</sub>: 0.108 lb/MMBtu, SO<sub>x</sub> (as SO<sub>2</sub>): 1.026 lb/MMBtu, NO<sub>x</sub> (as NO<sub>2</sub>): 0.036 lb/MMBtu or 30 ppmv @ 3% O<sub>2</sub>, VOC: 0.006 lb/MMBtu, and CO: 0.029 lb/MMBtu or 39 ppmv @ 3% O<sub>2</sub>. [District NSR Rule, Rules 4305, and 4351] Federally Enforceable Through Title V Permit
8. Permittee shall measure and record, at least monthly, the sulfur content and BTU content of the vapor recovery gas incinerated in this unit. [District NSR Rule and 4406] Federally Enforceable Through Title V Permit
9. Permittee shall measure and record the natural gas sulfur content and BTU content at the time of NO<sub>x</sub> testing, except for natural gas purchased from a PUC regulated utility. [District NSR Rule and 4406] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. Permittee shall maintain daily records of volume of natural gas burned and vapor recovery system gas incinerated. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Source testing to demonstrate compliance with NO<sub>x</sub> and CO emission limits shall be conducted not less than once every 12 months, except as provided below. [District Rules 2520, 9.3.2, 4305 and 4351] Federally Enforceable Through Title V Permit
12. Source testing to demonstrate compliance with NO<sub>x</sub> and CO emission limits shall be conducted not less than once every 36 months if compliance is demonstrated on two consecutive annual tests. [District Rules 2520, 9.3.2, 4305 and 4351] Federally Enforceable Through Title V Permit
13. If permittee fails any compliance demonstration for NO<sub>x</sub> and CO emission limits when testing not less than once every 36 months, compliance with NO<sub>x</sub> and CO emission limits shall be demonstrated not less than once every 12 months. [District Rules 2520, 9.3.2, 4305 and 4351] Federally Enforceable Through Title V Permit
14. Compliance demonstration (source testing) shall be conducted by independent testing laboratories and shall be witnessed or authorized by the District. Sample collection shall be done by an ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
15. 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
16. 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
17. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, NO<sub>x</sub> (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<sub>x</sub> (lb/MMBtu) - ARB Method 100 and EPA Method 19, fuel gas sulfur content - ASTM D3246 or double GC for H<sub>2</sub>S and mercaptans, or other test methods approved by the District. [District Rules 1081, 4305, and 4351] Federally Enforceable Through Title V Permit
18. No less than 4.54 miles of roads shall be paved and maintained to provide particulate matter offsets for Project 62 and 95. [District NSR Rule] Federally Enforceable Through Title V Permit
19. Only hot mix asphalt of a type conforming to Caltrans Standard Specifications shall be used in the paving or maintenance of roads used to provide particulate matter offsets for Project 62 and 95. [District NSR Rule] Federally Enforceable Through Title V Permit
20. Copies of all gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
21. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO<sub>2</sub>, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3 and Kern County Rules 404 and 408] Federally Enforceable Through Title V Permit
22. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO<sub>2</sub>. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit
23. 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, 9.3.2] 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.

24. 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, 6A, 6B, 6C; or Method 8 or ARB Method 1-100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by GC-FPD/TCD performed in the laboratory and EPA Method 19 to calculated emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months, however annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
25. 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, D 3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
26. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2; 4305, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit
27. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period [ Kern County Rule 407]. To demonstrate compliance with this requirement the operator shall do one of the following: fire the unit only on PUC or FERC regulated natural gas or test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
28. Nitrogen oxide (NOx) emissions shall not exceed 140 lb/hr, calculated as NO2. [District Rules 4301, 5.2.2 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
29. Emissions for this unit shall be calculated using the arithmetic mean, pursuant to District Rule 1081 (Amended December 16, 1993), of 3 thirty-minute test runs for NOx and CO. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
30. Annual test results submitted to the District from unit(s) representing a group of units may be used to measure NOx and CO emissions of this permit for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NOx emission limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. (This requirement shall not supersede a more stringent NSR or PSD permit testing requirement.) [District Rules 2520, 9.3.2, 4305, 6.3.2 and 4351, 6.3] Federally Enforceable Through Title V Permit
31. The following conditions must be met for representative unit(s) to be used to test for NOx and CO limits for a group of units: 1) all units are initially source tested and emissions from each unit in group are less than 90% of the permitted value and vary 25% or less from the average of all runs, 2) all units in group are similar in terms of rated heat input (rating not to exceed 100 MMBtu/hr), make and series, operation conditions, and control method, and 3) the group is owned by a single owner and located at a single stationary source. [District Rule 2520, 9.3.2 and 4305, 6.3.2] Federally Enforceable Through Title V Permit
32. All units in a group for which representative units are source for NOx and CO emissions shall have received the same maintenance and tune-up procedures as the representative unit(s). These tune-up procedures shall be completed according to District Rule 4304 (Adopted October 19, 1995) and tune-up test results shall show comparable results for each unit in the group. Records shall be maintained for the each unit of the group including all preventative and corrective maintenance work done. [District Rules 2520, 9.3.2 and 4305, 6.3.2] Federally Enforceable Through Title V Permit
33. All units in a group for which representative units are source tested for NOx and CO emissions shall have received the same maintenance and tune-up procedures as the representative unit(s). [District Rules 2520, 9.3.2 and 4305, 6.3.2] 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.

34. The number of representative units source tested for NO<sub>x</sub> and CO emissions shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that in 3 years, all units in the entire group will have been tested at least once. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
35. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of District Rules 4201, 4301 and 4801. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
36. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c 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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1131-78-22

**EXPIRATION DATE:** 02/28/2007

**SECTION:** 19 **TOWNSHIP:** 28S **RANGE:** 28E

**EQUIPMENT DESCRIPTION:**

62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS-FIRED C.E. NATCO STEAM GENERATOR (HSG# 60-69; DIS# 20610-79) WITH A NORTH AMERICAN MAGNA FLAME GLE LOW-NOX BURNER AND FLUE GAS RECIRCULATION (CANFIELD LEASE)

## PERMIT UNIT REQUIREMENTS

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1. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
2. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
3. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
4. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
5. The portable analyzer shall be calibrated prior to each use with a two-point calibration method (zero and span). Calibration shall be performed with certified calibration gases. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
6. Emissions from the steam generator shall not exceed any of the following limits: 0.108 lb-PM<sub>10</sub>/MMBtu, 1.026 lb-SO<sub>x</sub> (as SO<sub>2</sub>)/MMBtu, 0.006 lb-VOC/MMBtu. [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.

7. Except during start-up and shutdown, emissions from the steam generator shall not exceed any of the following limits: 15 ppmvd NOx @ 3% O2 (or 0.0182 lb-NOx/MMBtu), or 50 ppmvd CO @ 3% O2 (or 0.037 lb-CO/MMBtu). [District NSR Rule and District Rules 4305, 5.1, and 4306, 5.1] Federally Enforceable Through Title V Permit
8. During start-up and shutdown, emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Maximum emissions from the steam generator, including start-up and shutdown, shall not exceed any of the following limits: 54.0 lb-NOx/day, 9,965 lb-NOx/yr, or 55.5 lb-CO/day. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Duration of start-up and shutdown shall not exceed 2 hours each per occurrence. [District Rules 4305, 5.5.6 and 4306, 5.3] Federally Enforceable Through Title V Permit
11. Permittee shall maintain records of duration of each start-up and shutdown for a period of five years and make such records readily available for District inspection upon request. [District Rule 4306, 6.1] Federally Enforceable Through Title V Permit
12. Permittee shall measure and record, at least monthly, the sulfur content and BTU content of the vapor recovery gas incinerated in this unit. [District NSR Rule and District Rule 4406] Federally Enforceable Through Title V Permit
13. Permittee shall measure and record the natural gas sulfur content and BTU content at the time of NOx testing, except for natural gas purchased from a PUC regulated utility. [District NSR Rule and Rule 4406] Federally Enforceable Through Title V Permit
14. Permittee shall maintain daily records of volume of natural gas burned and vapor recovery system gas incinerated. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Source testing to demonstrate compliance with NOx and CO emission limits shall be conducted not less than once every 12 months, except as provided below. [District Rules 2520, 9.3.2; 4305, 6.3.1; 4306, 6.3.1 and 4351] Federally Enforceable Through Title V Permit
16. Source testing to demonstrate compliance with NOx and CO emission limits shall be conducted not less than once every 36 months if compliance is demonstrated on two consecutive annual tests. [District Rules 2520, 9.3.2; 4305, 6.3.1; 4306, 6.3.1; and 4351] Federally Enforceable Through Title V Permit
17. If permittee fails any compliance demonstration for NOx and CO emission limits when testing not less than once every 36 months, compliance with NOx and CO emission limits shall be demonstrated not less than once every 12 months. [District Rules 2520, 9.3.2; 4305, 6.3.1; 4306, 6.3.1; and 4351] Federally Enforceable Through Title V Permit
18. Compliance demonstration (source testing) shall be conducted by independent testing laboratories and shall be witnessed or authorized by the District. Sample collection shall be done by an ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
19. 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
20. 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
21. 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 ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, SOx (lb/MMBtu) - ARB Method 100 and EPA Method 19, fuel gas sulfur content - ASTM D1072, D3246, D4084 or a grab sample analysis by double GC for H2S and mercaptans performed in the laboratory. [District Rules 1081; 4305, 6.2; 4306, 6.2; 4351] Federally Enforceable Through Title V Permit
22. No less than 4.54 miles of roads shall be paved and maintained to provide particulate matter offsets for Project 62 and 95. [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. Only hot mix asphalt of a type conforming to Caltrans Standard Specifications shall be used in the paving or maintenance of roads used to provide particulate matter offsets for Project 62 and 95. [District NSR Rule] Federally Enforceable Through Title V Permit
24. Copies of all gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
25. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO<sub>2</sub>, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3 and Kern County Rules 404 and 408] Federally Enforceable Through Title V Permit
26. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO<sub>2</sub>. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit
27. 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, 9.3.2] Federally Enforceable Through Title V Permit
28. When complying with SO<sub>x</sub> emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6, 6A, 6B, 6C; or Method 8 or ARB Method 1-100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by double GC for H<sub>2</sub>S 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, 9.3.2] Federally Enforceable Through Title V Permit
29. If the unit is fired on noncertified gaseous fuel and compliance with SO<sub>x</sub> emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D1072, D4084, D3246 or grab sample analysis by double GC for H<sub>2</sub>S and mercaptans performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
30. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: ASTM D1826 or D1945 in conjunction with ASTM D3588 for gaseous fuels. [District Rules 2520, 9.3.2; 4305, 6.2.1; 4306, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit
31. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period [Kern County Rule 407]. To demonstrate compliance with this requirement the operator shall do one of the following: fire the unit only on PUC or FERC regulated natural gas or test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
32. Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 140 lb/hr, calculated as NO<sub>2</sub>. [District Rules 4301, 5.2.2 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
33. Emissions for this unit shall be calculated using the arithmetic mean, pursuant to District Rule 1081 (amended December 16, 1993), of 3 thirty-minute test runs for NO<sub>x</sub> and CO. [District Rule 2520, 9.3.2] 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.

34. Annual test results submitted to the District from unit(s) representing a group of units may be used to measure NOx and CO emissions of this permit for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NOx emission limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. (This requirement shall not supersede a more stringent NSR or PSD permit testing requirement.) [District Rules 4305, 6.3.2.4; 4306, 6.3.2.4 ; and 4351, 6.3] Federally Enforceable Through Title V Permit
35. The following conditions must be met for representative unit(s) to be used to test for NOx and CO limits for a group of units: 1) all units are initially source tested and emissions from each unit in group are less than 90% of the permitted value and vary 25% or less from the average of all runs, 2) all units in group are similar in terms of rated heat input (rating not to exceed 100 MMBtu/hr), make and series, operation conditions, and control method, and 3) the group is owned by a single owner and located at a single stationary source. [District Rules 4305, 6.3.2.1 and 4306, 6.3.2.1] Federally Enforceable Through Title V Permit
36. All units in a group for which representative units are source tested for NOx and CO emissions shall have received the same maintenance and tune-up procedures as the representative unit(s). [District Rules 4305, 6.3.2.6 and 4306, 6.3.2.6] Federally Enforceable Through Title V Permit
37. All units in a group for which representative units are source tested for NOx and CO emissions of this permit shall be fired on the same fuel type during the entire compliance period. If a unit switches for any time to an alternate fuel type (e.g. from natural gas to oil) then that unit shall not be considered part of the group and shall be required to undergo a source test for all fuel types used, within one year of the switch. [District Rules 4305, 6.3.2.2 and 4306, 6.3.2.2] Federally Enforceable Through Title V Permit
38. The number of representative units source tested for NOx and CO emissions shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that in 3 years, all units in the entire group will have been tested at least once. [District Rules 4305, 6.3.2.5 and 4306, 6.3.2.5] Federally Enforceable Through Title V Permit
39. 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, 6.1; and 4306, 6.1] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of District Rules 4201, 4301 and 4801. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c 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

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

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**ISSUANCE DATE:** 03/07/2005  
**DRAFT**

**PERMIT NO:** S-1131-82-24

**LEGAL OWNER OR OPERATOR:** CHEVRON USA INC  
**MAILING ADDRESS:** PO BOX 1392  
BAKERSFIELD, CA 93302

**LOCATION:** HEAVY OIL CENTRAL  
KERN COUNTY, CA

**SECTION:** SE05 **TOWNSHIP:** 29S **RANGE:** 28E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS-FIRED C.E. NATCO STEAM GENERATOR (HSG# 60-88; DIS# 20643-79) WITH FLUE GAS RECIRCULATION, NORTH AMERICAN, MODEL #5131-HGCR-62.5, BURNER AND NORTH AMERICAN OPTIMIZER - SJ LOWER: RETROFIT THE STEAM GENERATOR WITH A NORTH AMERICAN MODEL GLE MAGNA-FLAME (OR DISTRICT APPROVED EQUIVALENT) LOW NOX BURNER TO ACHIEVE 15 PPMVD-NOX @ 3% O2 (0.0182 LB-NOX/MMBTU)

**CONDITIONS**

1. {1829} The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Permits to Operate (PTOs) S-1127-244, and S-1131-711, -712, -713, -882, -929, -979, -981, -988, -989, -991, and -1028 shall be cancelled not later than the date of initial operation of this modified emissions unit. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The permittee shall obtain written District approval for the use of any equivalent equipment not specifically approved by this Authority to Construct. Approval of the equivalent equipment shall be made only after the District's determination that the submitted design and performance of the proposed alternate equipment is equivalent to the specifically authorized equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The permittee's request for approval of equivalent equipment shall include the make, model, manufacturer's maximum rating, manufacturer's guaranteed emission rates, equipment drawing(s), and operational characteristics/parameters. [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-1131-82-24 : Apr 26 2010 3:43PM - RICKARDK : Joint Inspection NOT Required

5. Alternate equipment shall be of the same class and category of source as the equipment authorized by the Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
6. No emission factor and no emission shall be greater for the alternate equipment than for the proposed equipment. No changes in the hours of operation, operating rate, throughput, or firing rate may be authorized for any alternate equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
7. This Authority to Construct shall be implemented according to the date proposed in the District approved Rule 4306 Emission Control Plan. [District Rule 4306, 6.4] Federally Enforceable Through Title V Permit
8. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
9. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
10. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
11. Permittee shall measure and record, at least monthly, the sulfur content and BTU content of the vapor recovery gas incinerated in this unit. [District Rule 4406, 4.0] Federally Enforceable Through Title V Permit
12. Permittee shall measure and record the natural gas sulfur content and BTU content at the time of NOx testing, except for natural gas purchased from a PUC regulated utility. [District Rule 4406, 4.0] Federally Enforceable Through Title V Permit
13. No less than 4.54 miles of roads shall be paved and maintained to provide particulate matter offsets for Project 62 and 95. [District NSR Rule]
14. Only hot mix asphalt of a type conforming to Caltrans Standard Specifications shall be used in the paving or maintenance of roads used to provide particulate matter offsets for Project 62 and 95. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Flue gas recirculation shall be utilized, as needed, in conjunction with low-NOx burner to maintain ongoing compliance with permitted emission limits. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Emissions from the steam generator shall not exceed any of the following limits: 1.026 lb-SOx/MMBtu, 0.108 lb-PM10/MMBtu, or 0.006 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 15 ppmvd NOx @ 3% O2 or 0.0182 lb-NOx/MMBtu or 39 ppmvd CO @ 3% O2 or 0.029 lb-CO/MMBtu. [District Rules 2201, 4301, 5.2, 4305, 5.1, 4306, 5.1, and 4351, 5.1] Federally Enforceable Through Title V Permit
18. During start-up and shutdown periods, emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
19. During the initial "shakedown" period emissions from the steam generator shall not exceed any of the following limits: 30 ppmvd NOx @ 3% O2 or 0.036 lb-NOx/MMBtu, 1.026 lb-SOx/MMBtu, 0.108 lb-PM10/MMBtu, 39 ppmvd CO @ 3% O2 or 0.029 lb-CO/MMBtu, or 0.006 lb-VOC/MMBtu. [District Rules 2201] Federally Enforceable Through Title V Permit
20. During a shakedown period not to exceed 60 calendar days from initial operation of the modifications authorized by this ATC, NOx 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 Rules 4305, 5.5.6 and 4306, 5.3] Federally Enforceable Through Title V Permit
21. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.25 and 3.22] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

22. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 4305, 5.5.6 and 4306, 5.3] Federally Enforceable Through Title V Permit
23. Emissions from the steam generator shall not exceed either of the following limits: 54.0 lb-NO<sub>x</sub>/day or 43.5 lb-CO/day. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 6.3.1, 4306, 6.3.1, and 4351, 6.3.1] Federally Enforceable Through Title V Permit
25. Source testing to measure natural gas-combustion NO<sub>x</sub> 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, 6.3.1, 4306, 6.3.1, and 4351, 6.3.1] Federally Enforceable Through Title V Permit
26. Whenever the flue gas recirculation (FGR) system on this unit is switched from the open to the closed position, or from the closed to the open position, compliance source testing for NO<sub>x</sub> and CO emissions shall be conducted within 60 days of change of FGR operation date unless source testing with FGR system in both the open and closed position has occurred within the previous 12 months. [District Rule 1070] Federally Enforceable Through Title V Permit
27. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
28. {2417} Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [County Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus)] Federally Enforceable Through Title V Permit
29. If the steam generator is fired on PUC-regulated natural gas, then the permittee shall maintain on file copies of all natural gas bills or fuel throughput records for a period of five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
30. If the steam generator is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the engine shall be determined using ASTM D 1072, D 3031, D 4084, D 3246, double GC for H<sub>2</sub>S and mercaptans, or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
31. If the steam generator is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that 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 quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
32. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

33. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
34. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
35. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, NO<sub>x</sub> (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, stack gas moisture content - EPA Method 4, stack gas velocities - EPA Method 2, and fuel gas sulfur content - ASTM D3246 or double GC for H<sub>2</sub>S and mercaptans. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
36. 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
37. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 5.5.2 and 4306, 5.5.2] Federally Enforceable Through Title V Permit
38. 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
39. 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
40. Annual test results submitted to the District from unit(s) representing a group of units may be used to measure NO<sub>x</sub> and CO emissions of this permit for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NO<sub>x</sub> and CO emission limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. (This requirement shall not supersede a more stringent NSR or PSD permit testing requirement.) [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
41. The following conditions must be met for representative unit(s) to be used to test for NO<sub>x</sub> and CO limits for a group of units: 1) all units are initially source tested and emissions from each unit in group are less than 90% of the permitted value and vary 25% or less from the average of all runs, 2) all units in group are similar in terms of rated heat input (rating not to exceed 100 MMBtu/hr), make and series, operation conditions, and control method, and 3) the group is owned by a single owner and located at a single stationary source. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
42. All units in a group for which representative units are source tested for NO<sub>x</sub> and CO emissions shall have received the same maintenance and tune-up procedures as the representative unit(s). [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

43. All units in a group for which representative units are source tested to for NO<sub>x</sub> and CO emissions of this permit shall be fired on the same fuel type during the entire compliance period. If a unit switches for any time to an alternate fuel type then that unit shall not be considered part of the group and shall be required to undergo a source test for all fuel types used, within one year of the switch. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
44. The number of representative units source tested for NO<sub>x</sub> and CO emissions shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that in 3 years, all units in the entire group will have been tested at least once. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
45. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
46. Permittee shall maintain daily records of volume of natural gas burned and vapor recovery system gas incinerated. [District NSR Rule] Federally Enforceable Through Title V Permit
47. Copies of all gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any non-certified fuel. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
48. 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, 6.1, and 4306, 6.1] Federally Enforceable Through Title V Permit
49. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of District Rules 4201, 4301 and 4801. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
50. {1669} This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c 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

DRAFT

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1131-94-26

**EXPIRATION DATE:** 02/28/2007

**SECTION:** 29 **TOWNSHIP:** 28S **RANGE:** 28E

**EQUIPMENT DESCRIPTION:**

DORMANT 62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS-FIRED STRUTHERS STEAM GENERATOR (HSG# 70-08; DIS# 20627-81) WITH FLUE GAS RECIRCULATION, NORTH AMERICAN, MODEL #5131-HGCR-62. 5, BURNER AND NORTH AMERICAN OPTIMIZER (CANFIELD LEASE)

## PERMIT UNIT REQUIREMENTS

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1. No modification to this unit shall be performed without an Authority to Construct for such modification(s), except for changes specified in conditions below. [District Rules 2201, 4305 and 4306] Federally Enforceable Through Title V Permit
2. The fuel supply line shall be physically disconnected from this unit. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
3. This equipment shall not be operated for any reason until an Authority to Construct permit is issued approving all necessary retrofits required to comply with the applicable requirements of District Rule 4306 and all other applicable District regulations. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
4. The stack concentration of NO<sub>x</sub> (as NO<sub>2</sub>), CO and O<sub>2</sub> shall be measured at least on a monthly basis using district approved portable analyzers in any calendar month in which the unit operates. [District Rules 2520, 9.3.2 and 4305] Federally Enforceable Through Title V Permit
5. The permittee shall maintain records of the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, the measured NO<sub>2</sub> and CO concentrations corrected to 3% O<sub>2</sub> and the O<sub>2</sub> concentration. The records shall also include a description of any corrective action taken to maintain the emissions in the acceptable range. These records shall be retained at the facility for a period of no less than five years and shall be made readily available for district inspection upon request. [District Rules 2520, 9.3.2 and 4305] Federally Enforceable Through Title V Permit
6. If the NO<sub>x</sub> or CO concentrations, as measured by the portable analyzer, exceed the permitted emission limits, the permittee or third party shall notify the District and return the NO<sub>x</sub> and CO concentrations to the permitted emission limits as soon as possible but no longer than one (1) hour after detection. If the portable analyzer readings continue to exceed the permitted emission limits after one (1) hour, the permittee shall conduct a source test within 60 days, of the first exceedance to demonstrate compliance with the permitted emission limits. [District Rules 2520, 9.3.2 and 4305] Federally Enforceable Through Title V Permit
7. Emission rates shall not exceed the following PM<sub>10</sub>: 0.108 lb/MMBtu, SO<sub>x</sub> (as SO<sub>2</sub>): 1.026 lb/MMBtu, NO<sub>x</sub> (as NO<sub>2</sub>): 0.036 lb/MMBtu or 30 ppmv @ 3% O<sub>2</sub>, VOC: 0.006 lb/MMBtu, and CO: 0.029 lb/MMBtu or 39 ppmv @ 3% O<sub>2</sub>. [District NSR Rule, Rules 4305, 4351] Federally Enforceable Through Title V Permit
8. Permittee shall measure and record, at least monthly, the sulfur content and BTU content of the vapor recovery gas incinerated in this unit. [District NSR Rule and 4406] Federally Enforceable Through Title V Permit
9. Permittee shall measure and record the natural gas sulfur content and BTU content at the time of NO<sub>x</sub> testing, except for natural gas purchased from a PUC regulated utility. [District NSR Rule and Rule 4406] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. Permittee shall maintain daily records of volume of natural gas burned and vapor recovery system gas incinerated. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Source testing to demonstrate compliance with NO<sub>x</sub> and CO emission limits shall be conducted not less than once every 12 months, except as provided below. [District Rules 2201, 4305, 4306, and 4351] Federally Enforceable Through Title V Permit
12. Source testing to demonstrate compliance with NO<sub>x</sub> and CO emission limits shall be conducted not less than once every 36 months if compliance is demonstrated on two consecutive annual tests. [District Rules 2520, 9.3.2, 4305 and 4351] Federally Enforceable Through Title V Permit
13. If permittee fails any compliance demonstration for NO<sub>x</sub> and CO emission limits when testing not less than once every 36 months, compliance with NO<sub>x</sub> and CO emission limits shall be demonstrated not less than once every 12 months. [District Rules 2520, 9.3.2, 4305 and 4351] Federally Enforceable Through Title V Permit
14. Compliance demonstration (source testing) shall be conducted by independent testing laboratories and shall be witnessed or authorized by the District. Sample collection shall be done by an ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
15. 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
16. 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
17. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, NO<sub>x</sub> (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<sub>x</sub> (lb/MMBtu) - ARB Method 100 and EPA Method 19, fuel gas sulfur content - ASTM D3246 or double GC for H<sub>2</sub>S and mercaptans, or other test methods approved by the District. [District Rules 1081, 4305, and 4351] Federally Enforceable Through Title V Permit
18. No less than 4.54 miles of roads shall be paved and maintained to provide particulate matter offsets for Project 62 and 95. [District NSR Rule] Federally Enforceable Through Title V Permit
19. Only hot mix asphalt of a type conforming to Caltrans Standard Specifications shall be used in the paving or maintenance of roads used to provide particulate matter offsets for Project 62 and 95. [District NSR Rule] Federally Enforceable Through Title V Permit
20. Copies of all gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
21. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO<sub>2</sub>, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3 and Kern County Rules 404 and 408] Federally Enforceable Through Title V Permit
22. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO<sub>2</sub>. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit
23. 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, 9.3.2] 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.

24. When complying with SO<sub>x</sub> emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6, 6A, 6B, 6C; or Method 8 or ARB Method 1-100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by GC-FPD/TCD performed in the laboratory and EPA Method 19 to calculated emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months, however annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
25. If the unit is fired on noncertified gaseous fuel and compliance with SO<sub>x</sub> emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
26. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2; 4305, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit
27. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period [ Kern County Rule 407]. To demonstrate compliance with this requirement the operator shall do one of the following: fire the unit only on PUC or FERC regulated natural gas or test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
28. Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 140 lb/hr, calculated as NO<sub>2</sub>. [District Rules 4301, 5.2.2 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
29. Emissions for this unit shall be calculated using the arithmetic mean, pursuant to District Rule 1081 (amended December 16, 1993), of 3 thirty-minute test runs for NO<sub>x</sub> and CO. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
30. Annual test results submitted to the District from unit(s) representing a group of units may be used to measure NO<sub>x</sub> and CO emissions of this permit for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NO<sub>x</sub> emission limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. (This requirement shall not supersede a more stringent NSR or PSD permit testing requirement.) [District Rules 2520, 9.3.2, 4305, 6.3.2 and 4351, 6.3] Federally Enforceable Through Title V Permit
31. The following conditions must be met for representative unit(s) to be used to test for NO<sub>x</sub> and CO limits for a group of units: 1) all units are initially source tested and emissions from each unit in group are less than 90% of the permitted value and vary 25% or less from the average of all runs, 2) all units in group are similar in terms of rated heat input (rating not to exceed 100 MMBtu/hr), make and series, operation conditions, and control method, and 3) the group is owned by a single owner and located at a single stationary source. [District Rule 2520, 9.3.2 and 4305, 6.3.2] Federally Enforceable Through Title V Permit
32. All units in a group for which representative units are source tested for NO<sub>x</sub> and CO emissions shall have received the same maintenance and tune-up procedures as the representative unit(s). [District Rules 2520, 9.3.2 and 4305, 6.3.2] Federally Enforceable Through Title V Permit
33. All units in a group for which representative units are source tested to for NO<sub>x</sub> and CO emissions of this permit shall be fired on the same fuel type during the entire compliance period. If a unit switches for any time to an alternate fuel type (e.g. from natural gas to oil) then that unit shall not be considered part of the group and shall be required to undergo a source test for all fuel types used, within one year of the switch. [District Rules 2520, 9.3.2 and 4305, 6.3.2] Federally Enforceable Through Title V Permit
34. The number of representative units source tested for NO<sub>x</sub> and CO emissions shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that in 3 years, all units in the entire group will have been tested at least once. [District Rule 2520, 9.3.2] 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.

35. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of District Rules 4201, 4301 and 4801. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
36. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c 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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1131-95-22

**EXPIRATION DATE:** 02/28/2007

**SECTION:** SE05 **TOWNSHIP:** 29S **RANGE:** 28E

## **EQUIPMENT DESCRIPTION:**

62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS/GAS FIRED STRUTHERS STEAM GENERATOR (HSG# 70-31; DIS# 20642-79) WITH A NORTH AMERICAN MODEL GLE MAGNA-FLAME LOW NOX BURNER, FLUE GAS RECIRCULATION (FGR) SYSTEM AND NORTH AMERICAN OPTIMIZER - SJ LOWER

## **PERMIT UNIT REQUIREMENTS**

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Permittee shall measure and record, at least monthly, the sulfur content and BTU content of the vapor recovery gas incinerated in this unit. [District Rule 4406, 4.0] Federally Enforceable Through Title V Permit
3. Permittee shall measure and record the natural gas sulfur content and BTU content at the time of NOx testing, except for natural gas purchased from a PUC regulated utility. [District Rule 4406, 4.0] Federally Enforceable Through Title V Permit
4. No less than 4.54 miles of roads shall be paved and maintained to provide particulate matter offsets for Project 62 and 95. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Only hot mix asphalt of a type conforming to Caltrans Standard Specifications shall be used in the paving or maintenance of roads used to provide particulate matter offsets for Project 62 and 95. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Flue gas recirculation shall be utilized, as needed, in conjunction with low-NOx burner to maintain ongoing compliance with permitted emission limits. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Emissions from the steam generator shall not exceed any of the following limits: 1.026 lb-SOx/MMBtu, 0.108 lb-PM10/MMBtu, or 0.006 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 15 ppmvd NOx @ 3% O2 or 0.0182 lb-NOx/MMBtu or 39 ppmvd CO @ 3% O2 or 0.029 lb-CO/MMBtu. [District Rules 2201, 4301, 5.2, 4305, 5.1, 4306, 5.1, and 4351, 5.1] Federally Enforceable Through Title V Permit
9. During start-up and shutdown periods, emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.25 and 3.22] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 4305, 5.5.6 and 4306, 5.3] Federally Enforceable Through Title V Permit
12. Emissions from the steam generator shall not exceed either of the following limits: 54.0 lb-NOx/day or 43.5 lb-CO/day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Source testing to measure natural gas-combustion NOx 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, 6.3.1, 4306, 6.3.1, and 4351, 6.3.1] Federally Enforceable Through Title V Permit
14. 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
15. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [County Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus)] Federally Enforceable Through Title V Permit
16. If the steam generator is fired on PUC-regulated natural gas, then the permittee shall maintain on file copies of all natural gas bills or fuel throughput records for a period of five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
17. If the steam generator is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the engine shall be determined using ASTM D 1072, D 3031, D 4084, D 3246, double GC for H2S and mercaptans, or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
18. If the steam generator is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that 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 quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
19. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
20. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit

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

21. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
22. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, NO<sub>x</sub> (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, stack gas moisture content - EPA Method 4, stack gas velocities - EPA Method 2, and fuel gas sulfur content - ASTM D3246 or double GC for H<sub>2</sub>S and mercaptans. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
23. 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
24. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 5.5.2 and 4306, 5.5.2] Federally Enforceable Through Title V Permit
25. 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
26. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
27. Annual test results submitted to the District from unit(s) representing a group of units may be used to measure NO<sub>x</sub> and CO emissions of this permit for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NO<sub>x</sub> and CO emission limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. (This requirement shall not supersede a more stringent NSR or PSD permit testing requirement.) [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
28. The following conditions must be met for representative unit(s) to be used to test for NO<sub>x</sub> and CO limits for a group of units: 1) all units are initially source tested and emissions from each unit in group are less than 90% of the permitted value and vary 25% or less from the average of all runs, 2) all units in group are similar in terms of rated heat input (rating not to exceed 100 MMBtu/hr), make and series, operation conditions, and control method, and 3) the group is owned by a single owner and located at a single stationary source. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
29. All units in a group for which representative units are source tested for NO<sub>x</sub> and CO emissions shall have received the same maintenance and tune-up procedures as the representative unit(s). [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
30. All units in a group for which representative units are source tested to for NO<sub>x</sub> and CO emissions of this permit shall be fired on the same fuel type during the entire compliance period. If a unit switches for any time to an alternate fuel type then that unit shall not be considered part of the group and shall be required to undergo a source test for all fuel types used, within one year of the switch. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
31. The number of representative units source tested for NO<sub>x</sub> and CO emissions shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that in 3 years, all units in the entire group will have been tested at least once. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] 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.

32. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
33. Permittee shall maintain daily records of volume of natural gas burned and vapor recovery system gas incinerated. [District Rule 2201] Federally Enforceable Through Title V Permit
34. Copies of all gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any non-certified fuel. [District Rule 2520, 9.3.2] 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, 4305, 6.1, and 4306, 6.1] Federally Enforceable Through Title V Permit
36. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of District Rules 4201, 4301 and 4801. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
37. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c 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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1131-98-29

**EXPIRATION DATE:** 02/28/2007

**SECTION:** SE05 **TOWNSHIP:** 29S **RANGE:** 28E

**EQUIPMENT DESCRIPTION:**

62.5 MMBTU/HR STRUTHERS NATURAL GAS/VAPOR RECOVERY GAS-FIRED STEAM GENERATOR (HSG# 70-44; DIS# 20608-82) WITH A NORTH AMERICAN MODEL #GLE-4231 LOW NOX BURNER AND FLUE GAS RECIRCULATION

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Permittee shall measure and record, at least monthly, the sulfur content and BTU content of the vapor recovery gas incinerated in this unit. [District Rule 4406, 4.0] Federally Enforceable Through Title V Permit
3. Permittee shall measure and record the natural gas sulfur content and BTU content at the time of NOx testing, except for natural gas purchased from a PUC regulated utility. [District Rule 4406, 4.0] Federally Enforceable Through Title V Permit
4. No less than 4.54 miles of roads shall be paved and maintained to provide particulate matter offsets for Project 62 and 95. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Only hot mix asphalt of a type conforming to Caltrans Standard Specifications shall be used in the paving or maintenance of roads used to provide particulate matter offsets for Project 62 and 95. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Emissions from the natural gas/vapor recovery gas-fired steam generator shall not exceed any of the following limits: 1.026 lb-SOx/MMBtu, 0.108 lb-PM10/MMBtu, or 0.006 lb-VOC/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Except during start-up and shutdown periods emissions from the natural gas/vapor recovery gas-fired steam generator shall not exceed any of the following limits: 15 ppmvd NOx @ 3% O2 or 0.0182 lb-NOx/MMBtu or 39 ppmvd CO @ 3% O2 or 0.029 lb-CO/MMBtu. [District NSR Rule and District Rules 4301, 5.2, 4305, 5.1, 4306, 5.1, and 4351, 5.1] Federally Enforceable Through Title V Permit
8. During start-up and shutdown periods emissions from the natural gas/vapor recovery gas-fired steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.25 and 3.22] Federally Enforceable Through Title V Permit
10. Emissions from the natural gas/vapor recovery gas-fired steam generator shall not exceed either of the following limits: 54.0 lb-NOx/day or 43.5 lb-CO/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.

11. Source testing to measure NO<sub>x</sub> 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, 6.3.1, 4306, 6.3.1, and 4351, 6.3.1] Federally Enforceable Through Title V Permit
12. 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
13. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [County Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus)] Federally Enforceable Through Title V Permit
14. If the steam generator is fired on PUC-regulated natural gas, then the permittee shall maintain on file copies of all natural gas bills or fuel throughput records for a period of five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. If the steam generator is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the engine shall be determined using ASTM D 1072, D 3031, D 4084, D 3246, double GC for H<sub>2</sub>S and mercaptans, or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. If the steam generator is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that 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 quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
17. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
18. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
19. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
20. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 6.2 and 4306, 6.2]
21. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

22. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
23. 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
24. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 5.5.2 and 4306, 5.5.2] Federally Enforceable Through Title V Permit
25. 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
26. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
27. Annual test results submitted to the District from unit(s) representing a group of units may be used to measure NO<sub>x</sub> and CO emissions of this permit for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NO<sub>x</sub> emission limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. (This requirement shall not supersede a more stringent NSR or PSD permit testing requirement.) [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
28. The following conditions must be met for representative unit(s) to be used to test for NO<sub>x</sub> and CO limits for a group of units: 1) all units are initially source tested and emissions from each unit in group are less than 90% of the permitted value and vary 25% or less from the average of all runs, 2) all units in group are similar in terms of rated heat input (rating not to exceed 100 MMBtu/hr), make and series, operation conditions, and control method, and 3) the group is owned by a single owner and located at a single stationary source. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
29. All units in a group for which representative units are source tested for NO<sub>x</sub> and CO emissions shall have received the same maintenance and tune-up procedures as the representative unit(s). [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
30. All units in a group for which representative units are source tested to for NO<sub>x</sub> and CO emissions of this permit shall be fired on the same fuel type during the entire compliance period. If a unit switches for any time to an alternate fuel type then that unit shall not be considered part of the group and shall be required to undergo a source test for all fuel types used, within one year of the switch. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
31. The number of representative units source tested for NO<sub>x</sub> and CO emissions shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that in 3 years, all units in the entire group will have been tested at least once. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
32. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
33. Permittee shall maintain daily records of volume of natural gas burned and vapor recovery system gas incinerated. [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.

34. Copies of all gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any non-certified fuel. [District Rule 2520, 9.3.2] 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, 4305, 6.1, and 4306, 6.1] Federally Enforceable Through Title V Permit
36. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c 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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1131-99-29

**EXPIRATION DATE:** 02/28/2007

**SECTION:** SE05 **TOWNSHIP:** 29S **RANGE:** 28E

**EQUIPMENT DESCRIPTION:**

62.5 MMBTU/HR STRUTHERS NATURAL GAS/VAPOR RECOVERY GAS-FIRED STEAM GENERATOR (HSG# 70-45; DIS# 20609-82) WITH A NORTH AMERICAN MODEL #GLE-4231 LOW NOX BURNER AND FLUE GAS RECIRCULATION

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Permittee shall measure and record, at least monthly, the sulfur content and BTU content of the vapor recovery gas incinerated in this unit. [District Rule 4406, 4.0] Federally Enforceable Through Title V Permit
3. Permittee shall measure and record the natural gas sulfur content and BTU content at the time of NOx testing, except for natural gas purchased from a PUC regulated utility. [District Rule 4406, 4.0] Federally Enforceable Through Title V Permit
4. No less than 4.54 miles of roads shall be paved and maintained to provide particulate matter offsets for Project 62 and 95. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Only hot mix asphalt of a type conforming to Caltrans Standard Specifications shall be used in the paving or maintenance of roads used to provide particulate matter offsets for Project 62 and 95. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Emissions from the natural gas/vapor recovery gas-fired steam generator shall not exceed any of the following limits: 1.026 lb-SOx/MMBtu, 0.108 lb-PM10/MMBtu, or 0.006 lb-VOC/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Except during start-up and shutdown periods emissions from the natural gas/vapor recovery gas-fired steam generator shall not exceed any of the following limits: 15 ppmvd NOx @ 3% O2 or 0.0182 lb-NOx/MMBtu or 39 ppmvd CO @ 3% O2 or 0.029 lb-CO/MMBtu. [District NSR Rule and District Rules 4301, 5.2, 4305, 5.1, 4306, 5.1, and 4351, 5.1] Federally Enforceable Through Title V Permit
8. During start-up and shutdown periods emissions from the natural gas/vapor recovery gas-fired steam generator shall not exceed either of the following limits: 0.1 lb-NOx/MMBtu or 0.084 lb-CO/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.25 and 3.22] Federally Enforceable Through Title V Permit
10. Emissions from the natural gas/vapor recovery gas-fired steam generator shall not exceed either of the following limits: 54.0 lb-NOx/day or 43.5 lb-CO/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.

11. Source testing to measure NO<sub>x</sub> 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, 6.3.1, 4306, 6.3.1, and 4351, 6.3.1] Federally Enforceable Through Title V Permit
12. 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
13. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [County Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus)] Federally Enforceable Through Title V Permit
14. If the steam generator is fired on PUC-regulated natural gas, then the permittee shall maintain on file copies of all natural gas bills or fuel throughput records for a period of five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. If the steam generator is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the engine shall be determined using ASTM D 1072, D 3031, D 4084, D 3246, double GC for H<sub>2</sub>S and mercaptans, or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. If the steam generator is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that 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 quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
17. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
18. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
19. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
20. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
21. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

22. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
23. 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
24. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 5.5.2 and 4306, 5.5.2] Federally Enforceable Through Title V Permit
25. 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
26. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
27. Annual test results submitted to the District from unit(s) representing a group of units may be used to measure NO<sub>x</sub> and CO emissions of this permit for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NO<sub>x</sub> emission limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. (This requirement shall not supersede a more stringent NSR or PSD permit testing requirement.) [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
28. The following conditions must be met for representative unit(s) to be used to test for NO<sub>x</sub> and CO limits for a group of units: 1) all units are initially source tested and emissions from each unit in group are less than 90% of the permitted value and vary 25% or less from the average of all runs, 2) all units in group are similar in terms of rated heat input (rating not to exceed 100 MMBtu/hr), make and series, operation conditions, and control method, and 3) the group is owned by a single owner and located at a single stationary source. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
29. All units in a group for which representative units are source tested for NO<sub>x</sub> and CO emissions shall have received the same maintenance and tune-up procedures as the representative unit(s). [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
30. All units in a group for which representative units are source tested to for NO<sub>x</sub> and CO emissions of this permit shall be fired on the same fuel type during the entire compliance period. If a unit switches for any time to an alternate fuel type then that unit shall not be considered part of the group and shall be required to undergo a source test for all fuel types used, within one year of the switch. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
31. The number of representative units source tested for NO<sub>x</sub> and CO emissions shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that in 3 years, all units in the entire group will have been tested at least once. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
32. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
33. Permittee shall maintain daily records of volume of natural gas burned and vapor recovery system gas incinerated. [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.

34. Copies of all gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any non-certified fuel. [District Rule 2520, 9.3.2] 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, 4305, 6.1, and 4306, 6.1] Federally Enforceable Through Title V Permit
36. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c 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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1131-858-13

**EXPIRATION DATE:** 02/28/2007

**SECTION:** SE29 **TOWNSHIP:** 28S **RANGE:** 28E

**EQUIPMENT DESCRIPTION:**

NON-COMPLIANT DORMANT 62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED NATIONAL STEAM GENERATOR (HSG# 50-43; DIS# 20628-79) WITH FLUE GAS RECIRCULATION, NORTH AMERICAN MODEL #5131-HGCR-62.5 BURNER, AND NORTH AMERICAN OPTIMIZER - (CANFIELD LEASE)

## PERMIT UNIT REQUIREMENTS

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1. No modification to this unit shall be performed without an Authority to Construct for such modification(s), except for changes specified in conditions below. [District Rules 2201, 4305 and 4306] Federally Enforceable Through Title V Permit
2. The fuel supply line shall be physically disconnected from this unit. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
3. This equipment shall not be operated for any reason until an Authority to Construct permit is issued approving all necessary retrofits required to comply with the applicable requirements of District Rule 4306 and all other applicable District regulations. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
4. The stack concentration of NO<sub>x</sub> (as NO<sub>2</sub>), CO and O<sub>2</sub> shall be measured at least on a monthly basis using district approved portable analyzers in any calendar month in which the unit operates. [District Rules 2520, 9.3.2 and 4305] Federally Enforceable Through Title V Permit
5. The permittee shall maintain records of the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, the measured NO<sub>2</sub> and CO concentrations corrected to 3% O<sub>2</sub> and the O<sub>2</sub> concentration. The records shall also include a description of any corrective action taken to maintain the emissions in the acceptable range. These records shall be retained at the facility for a period of no less than five years and shall be made readily available for district inspection upon request. [District Rules 2520, 9.3.2 and 4305] Federally Enforceable Through Title V Permit
6. If the NO<sub>x</sub> or CO concentrations, as measured by the portable analyzer, exceed the permitted emission limits, the permittee or third party shall notify the District and return the NO<sub>x</sub> and CO concentrations to the permitted emission limits as soon as possible but no longer than one (1) hour after detection. If the portable analyzer readings continue to exceed the permitted emission limits after one (1) hour, the permittee shall conduct a source test within 60 days, of the first exceedance to demonstrate compliance with the permitted emission limits. [District Rules 2520, 9.3.2 and 4305] Federally Enforceable Through Title V Permit
7. Emission rates shall not exceed the following PM<sub>10</sub>: 0.109 lb/MMBtu, SO<sub>x</sub> (as SO<sub>2</sub>): 1.026 lb/MMBtu, NO<sub>x</sub> (as NO<sub>2</sub>): 0.036 lb/MMBtu or 30 ppmv @ 3% O<sub>2</sub>, VOC: 0.006 lb/MMBtu, and CO: 0.029 lb/MMBtu or 39 ppmv @ 3% O<sub>2</sub>. [District NSR Rule, Rules 4305, and 4351] Federally Enforceable Through Title V Permit
8. Permittee shall measure and record, at least monthly, the sulfur content and BTU content of the vapor recovery gas incinerated in this unit. [District NSR Rule and 4406] Federally Enforceable Through Title V Permit
9. Permittee shall measure and record the natural gas sulfur content and BTU content at the time of NO<sub>x</sub> testing, except for natural gas purchased from a PUC regulated utility. [District NSR Rule and Rule 4406] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. Permittee shall maintain daily records of volume of natural gas burned and vapor recovery system gas incinerated. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Source testing to demonstrate compliance with NO<sub>x</sub> and CO emission limits shall be conducted not less than once every 12 months, except as provided below. [District Rules 2520, 9.3.2, 4305 and 4351] Federally Enforceable Through Title V Permit
12. Source testing to demonstrate compliance with NO<sub>x</sub> and CO emission limits shall be conducted not less than once every 36 months if compliance is demonstrated on two consecutive annual tests. [District Rules 2520, 9.3.2, 4305 and 4351] Federally Enforceable Through Title V Permit
13. If permittee fails any compliance demonstration for NO<sub>x</sub> and CO emission limits when testing not less than once every 36 months, compliance with NO<sub>x</sub> and CO emission limits shall be demonstrated not less than once every 12 months. [District Rules 2520, 9.3.2, 4305 and 4351] Federally Enforceable Through Title V Permit
14. Compliance demonstration (source testing) shall be conducted by independent testing laboratories and shall be witnessed or authorized by the District. Sample collection shall be done by an ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
15. 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
16. 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
17. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, NO<sub>x</sub> (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<sub>x</sub> (lb/MMBtu) - ARB Method 100 and EPA Method 19, fuel gas sulfur content - ASTM D3246 or double GC for H<sub>2</sub>S and mercaptans, or other test methods approved by the District. [District Rules 1081, 4305, and 4351] Federally Enforceable Through Title V Permit
18. No less than 4.54 miles of roads shall be paved and maintained to provide particulate matter offsets for Project 62 and 95. [District NSR Rule] Federally Enforceable Through Title V Permit
19. Only hot mix asphalt of a type conforming to Caltrans Standard Specifications shall be used in the paving or maintenance of roads used to provide particulate matter offsets for Project 62 and 95. [District NSR Rule] Federally Enforceable Through Title V Permit
20. Copies of all gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
21. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO<sub>2</sub>, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3 and Kern County Rules 404 and 408] Federally Enforceable Through Title V Permit
22. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO<sub>2</sub>. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit
23. 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, 9.3.2] 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.

24. 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, 6A, 6B, 6C; or Method 8 or ARB Method 1-100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by GC-FPD/TCD performed in the laboratory and EPA Method 19 to calculated emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months, however annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
25. 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, D 3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
26. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2; 4305, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit
27. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period [ Kern County Rule 407]. To demonstrate compliance with this requirement the operator shall do one of the following: fire the unit only on PUC or FERC regulated natural gas or test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
28. Nitrogen oxide (NOx) emissions shall not exceed 140 lb/hr, calculated as NO2. [District Rules 4301, 5.2.2 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
29. Emissions for this unit shall be calculated using the arithmetic mean, pursuant to District Rule 1081 (amended December 16, 1993), of 3 thirty-minute test runs for NOx and CO. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
30. Annual test results submitted to the District from unit(s) representing a group of units may be used to measure NOx and CO emissions of this permit for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NOx emission limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. (This requirement shall not supersede a more stringent NSR or PSD permit testing requirement.) [District Rules 2520, 9.3.2, 4305, 6.3.2 and 4351, 6.3] Federally Enforceable Through Title V Permit
31. The following conditions must be met for representative unit(s) to be used to test for NOx and CO limits for a group of units: 1) all units are initially source tested and emissions from each unit in group are less than 90% of the permitted value and vary 25% or less from the average of all runs, 2) all units in group are similar in terms of rated heat input (rating not to exceed 100 MMBtu/hr), make and series, operation conditions, and control method, and 3) the group is owned by a single owner and located at a single stationary source. [District Rule 2520, 9.3.2 and 4305, 6.3.2] Federally Enforceable Through Title V Permit
32. All units in a group for which representative units are source tested for NOx and CO emissions shall have received the same maintenance and tune-up procedures as the representative unit(s). [District Rules 2520, 9.3.2 and 4305, 6.3.2] Federally Enforceable Through Title V Permit
33. All units in a group for which representative units are source tested to for NOx and CO emissions of this permit shall be fired on the same fuel type during the entire compliance period. If a unit switches for any time to an alternate fuel type (e.g. from natural gas to oil) then that unit shall not be considered part of the group and shall be required to undergo a source test for all fuel types used, within one year of the switch. [District Rules 2520, 9.3.2 and 4305, 6.3.2] Federally Enforceable Through Title V Permit
34. The number of representative units source tested for NOx and CO emissions shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that in 3 years, all units in the entire group will have been tested at least once. [District Rule 2520, 9.3.2] 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.

35. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of District Rules 4201, 4301 and 4801. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
36. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c 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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1131-859-12

**EXPIRATION DATE:** 02/28/2007

**SECTION:** SE05 **TOWNSHIP:** 29S **RANGE:** 28E

**EQUIPMENT DESCRIPTION:**

62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR (HSG# 50-51; DIS# 19161- 75) WITH A NORTH AMERICAN MODEL GLE MAGNA-FLAME, LOW NOX BURNER, FLUE GAS RECIRCULATION (FGR) SYSTEM AND NORTH AMERICAN OPTIMIZER (SAN JOAQUIN LOWER)

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO<sub>2</sub>, nor 10 lb/hr. [District Rule 4201 and District Rule 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
2. Permittee shall measure and record, at least monthly, the sulfur content and BTU content of the vapor recovery gas incinerated in this unit. [District Rule 4406, 4.0] Federally Enforceable Through Title V Permit
3. Permittee shall measure and record the natural gas sulfur content and BTU content at the time of NO<sub>x</sub> testing, except for natural gas purchased from a PUC regulated utility. [District Rule 4406, 4.0] Federally Enforceable Through Title V Permit
4. No less than 4.54 miles of roads shall be paved and maintained to provide particulate matter offsets for Project 62 and 95. [District NSR Rule]
5. Only hot mix asphalt of a type conforming to Caltrans Standard Specifications shall be used in the paving or maintenance of roads used to provide particulate matter offsets for Project 62 and 95. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Flue gas recirculation shall be utilized, as needed, in conjunction with low-NO<sub>x</sub> burner to maintain ongoing compliance with permitted emission limits. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Emissions from the steam generator shall not exceed any of the following limits: 1.026 lb-SO<sub>x</sub>/MMBtu, 0.108 lb-PM<sub>10</sub>/MMBtu, or 0.006 lb-VOC/MMBtu. [District NSR Rule and District Rule 4301, 5.2] Federally Enforceable Through Title V Permit
8. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 15 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.0182 lb-NO<sub>x</sub>/MMBtu or 39 ppmvd CO @ 3% O<sub>2</sub> or 0.029 lb-CO/MMBtu. [District NSR Rule and District Rules 4301, 5.2, 4305, 5.1, 4306, 5.1, and 4351, 5.1] Federally Enforceable Through Title V Permit
9. During start-up and shutdown periods, emissions from the steam generator shall not exceed either of the following limits: 0.10 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District NSR Rule and 4351, 5.1] Federally Enforceable Through Title V Permit
10. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.25 and 3.22] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 4305, 5.5.6 and 4306, 5.3] Federally Enforceable Through Title V Permit
12. Emissions from the steam generator shall not exceed either of the following limits: 54.0 lb-NOx/day or 43.5 lb-CO/day. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [District Rule 4801 and Kern County Rule 407] Federally Enforceable Through Title V Permit
14. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO<sub>2</sub>. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit. [District Rules 2520, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit
15. Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 140 lb/hr, calculated as NO<sub>2</sub>. [District Rules 4301, 5.2.2 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. If the steam generator is fired on PUC-regulated natural gas, then the permittee shall maintain on file copies of all natural gas bills or fuel throughput records for a period of five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
17. If the steam generator is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the engine shall be determined using ASTM D 1072, D 3246, D 4084, double GC for H<sub>2</sub>S and mercaptans, or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
18. If the steam generator is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that 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 quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
19. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
20. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100 (amended December 17, 1992), the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

21. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
22. Source testing to measure natural gas-combustion NOx 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, 6.3.1, 4306, 6.3.1, and 4351, 6.3.1] Federally Enforceable Through Title V Permit
23. 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
24. 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
25. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
26. 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 ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, stack gas moisture content - EPA Method 4, stack gas velocities - EPA Method 2, and fuel gas sulfur content - ASTM D3246 or double GC for H2S and mercaptans. [District Rules 4305, 6.2, 4306, 6.2, and 4351, 6.2] Federally Enforceable Through Title V Permit
27. The fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rules 4305, 6.2, 4306, 6.2, and 4351, 6.2] 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, 5.5.2, 4306, 5.5.2, and 4351, 5.7] Federally Enforceable Through Title V Permit
29. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5.5 and 4306, 5.5.5] Federally Enforceable Through Title V Permit
30. Annual test results submitted to the District from unit(s) representing a group of units may be used to measure NOx and CO emissions of this permit for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NOx and CO emission limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. (This requirement shall not supersede a more stringent NSR or PSD permit testing requirement.) [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
31. The following conditions must be met for representative unit(s) to be used to test for NOx and CO limits for a group of units: 1) all units are initially source tested and emissions from each unit in group are less than 90% of the permitted value and vary 25% or less from the average of all runs, 2) all units in group are similar in terms of rated heat input (rating not to exceed 100 MMBtu/hr), make and series, operation conditions, and control method, and 3) the group is owned by a single owner and located at a single stationary source. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] 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.

32. All units in a group for which representative units are source tested for NO<sub>x</sub> and CO emissions shall have received the same maintenance and tune-up procedures as the representative unit(s). [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
33. All units in a group for which representative units are source tested for NO<sub>x</sub> and CO emissions of this permit shall be fired on the same fuel type during the entire compliance period. If a unit switches at any time to an alternate fuel type then that unit shall not be considered part of the group and shall be required to undergo a source test for all fuel types used, within one year of the switch. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
34. The number of representative units source tested for NO<sub>x</sub> and CO emissions shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that in 3 years, all units in the entire group will have been tested at least once. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
35. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
36. Permittee shall maintain daily records of volume of natural gas burned and vapor recovery system gas incinerated. [District NSR Rule] Federally Enforceable Through Title V Permit
37. Copies of all gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any non-certified fuel. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
38. 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, 6.1, 4306, 6.1, and 4351, 6.1] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of District Rules 4201, 4301, and 4801 (Kern County Rule 407). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c 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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1131-877-12

**EXPIRATION DATE:** 02/28/2007

**SECTION:** 04 **TOWNSHIP:** 29S **RANGE:** 28E

**EQUIPMENT DESCRIPTION:**

62.5 MM BTU/HR STRUTHERS NATURAL GAS/VAPOR RECOVERY GAS FIRED STRUTHERS STEAM GENERATOR #46 WITH FGR, NORTH AMERICAN MODEL GLE 4231 BURNER AND O2 CONTROLLER (CENTRAL PLANT)

## PERMIT UNIT REQUIREMENTS

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1. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
2. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
3. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
4. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
5. Steam generator shall be equipped with operational fuel gas volume flowmeter and vapor recovery gas volume flowmeter. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Exhaust gas stack shall be equipped with adequate provisions facilitating the collection of gas samples consistent with EPA Test Methods. [District NSR Rule and 1081] Federally Enforceable Through Title V Permit
7. Permittee shall measure and record, at least monthly, the sulfur content and BTU content of the vapor recovery gas incinerated in this unit. [District NSR Rule and 4406] 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. Permittee shall measure and record the natural gas sulfur content and BTU content at the time of NO<sub>x</sub> testing, except for natural gas purchased from a PUC regulated utility. [District NSR Rule and 4406] Federally Enforceable Through Title V Permit
9. Only PUC quality natural gas and noncondensable TVR gas from tank battery and associated FWKO vessels served by vapor control system listed on S-1132-8, S-1132-90, S-1131-885, S-1131-1040, and TEOR vapor control gas from S-1131-903 and -909 shall be combusted in this unit without prior District approval. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Permittee shall maintain daily records of volume of natural gas burned and vapor recovery system gas incinerated. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Total sulfur content of PUC quality natural gas combusted shall not exceed 0.2 grain/100 scf. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Emission rates shall not exceed any of the following: SO<sub>x</sub> (as SO<sub>2</sub>): 64.0 lb/day, PM<sub>10</sub>: 115.2 lb/day, or VOC: 4.2 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Emission rates, except during startup and shutdown, shall not exceed any of the following: NO<sub>x</sub> (as NO<sub>2</sub>): 0.018 lb/MMBtu or 15 ppmvd @ 3% O<sub>2</sub>, or CO: 28 ppmvd @ 3% O<sub>2</sub>. [District Rules 2201, 4301, 5.2, 4305, 5.1, 4306, 5.1, and 4351, 5.1] Federally Enforceable Through Title V Permit
14. Duration of start-up and shutdown shall not exceed 2 hours each per occurrence. [District Rules 4305, 5.5.6 and 4306, 5.3] Federally Enforceable Through Title V Permit
15. 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
16. 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
17. Source testing to measure natural gas-combustion NO<sub>x</sub> 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, 6.3.1, 4306, 6.3.1, and 4351, 6.3.1] Federally Enforceable Through Title V Permit
18. Compliance demonstration (source testing) shall be conducted by independent testing laboratories and shall be witnessed, or authorized by the District. Sample collection shall be done by ARB certified testing laboratory. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
19. 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
20. 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
21. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, NO<sub>x</sub> (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<sub>x</sub> (lb/MMBtu) - ARB Method 100 and EPA Method 19, fuel gas sulfur content - ASTM D3246 or double GC for H<sub>2</sub>S and mercaptans, or other test methods approved by the District. [District Rules 1081, 4305, 6.2, and 4306, 6.2] 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.

22. Copies of all gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
23. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO<sub>2</sub>, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3 and Kern County Rules 404 and 408] Federally Enforceable Through Title V Permit
24. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO<sub>2</sub>. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit
25. 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, 9.3.2] Federally Enforceable Through Title V Permit
26. When complying with SO<sub>x</sub> emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6, 6A, 6B, 6C; or Method 8 or ARB Method 1-100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by double GC performed in the laboratory and EPA Method 19 to calculated emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months, however annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
27. If the unit is fired on noncertified gaseous fuel and compliance with SO<sub>x</sub> emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by double GC performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
28. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2; 4305, 6.2.1; and 4306, 6.2.1] Federally Enforceable Through Title V Permit
29. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period [Kern County Rule 407]. To demonstrate compliance with this requirement the operator shall do one of the following: fire the unit only on PUC or FERC regulated natural gas or test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
30. Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 140 lb/hr, calculated as NO<sub>2</sub>. [District Rules 4301, 5.2.2 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
31. Emissions for this unit shall be calculated using the arithmetic mean, pursuant to District Rule 1081 (Amended December 16, 1993), of 3 thirty-minute test runs for NO<sub>x</sub> and CO. [District Rule 2520, 9.3.2] 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.

32. Annual test results submitted to the District from unit(s) representing a group of units may be used to measure NO<sub>x</sub> and CO emissions of this permit for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NO<sub>x</sub> emission limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. (This requirement shall not supersede a more stringent NSR or PSD permit testing requirement.) [District Rules 4305, 6.3.2 and 4306, 6.3.2] Federally Enforceable Through Title V Permit
33. The following conditions must be met for representative unit(s) to be used to test for NO<sub>x</sub> and CO limits for a group of units: 1) all units are initially source tested and emissions from each unit in group are less than 90% of the permitted value and vary 25% or less from the average of all runs, 2) all units in group are similar in terms of rated heat input (rating not to exceed 100 MMBtu/hr), make and series, operation conditions, and control method, and 3) the group is owned by a single owner and located at a single stationary source. [District Rule 2520, 9.3.2, 4305, 6.3.2 and 4306, 6.3.2] Federally Enforceable Through Title V Permit
34. All units in a group for which representative units are source tested for NO<sub>x</sub> and CO emissions shall have received the same maintenance and tune-up procedures as the representative unit(s). These tune-up procedures shall be completed according to District Rule 4304 (Adopted October 19, 1995) and tune-up test results shall show comparable results for each unit in the group. [District Rules 2520, 9.3.2, 4305, 6.3.2 and 4306, 6.3.2] Federally Enforceable Through Title V Permit
35. All units in a group for which representative units are source tested to for NO<sub>x</sub> and CO emissions of this permit shall be fired on the same fuel type during the entire compliance period. If a unit switches for any time to an alternate fuel type (e.g. from natural gas to oil) then that unit shall not be considered part of the group and shall be required to undergo a source test for all fuel types used, within one year of the switch. [District Rules 2520, 9.3.2, 4305, 6.3.2 and 4306, 6.3.2] Federally Enforceable Through Title V Permit
36. The number of representative units source tested for NO<sub>x</sub> and CO emissions shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that in 3 years, all units in the entire group will have been tested at least once. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
37. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of District Rules 4201, 4301 and 4801. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
38. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c 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
39. Formerly S-1143-3.

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1131-879-16

**EXPIRATION DATE:** 02/28/2007

**SECTION:** 04 **TOWNSHIP:** 29S **RANGE:** 28E

**EQUIPMENT DESCRIPTION:**

62.5 MMBTU/HR STRUTHERS NATURAL GAS/VAPOR RECOVERY GAS-FIRED STEAM GENERATOR WITH A NORTH AMERICAN GLE LOW-NOX BURNER WITH FGR AND AN O2 CONTROLLER (#70, CENTRAL PLANT)

## PERMIT UNIT REQUIREMENTS

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1. Steam generator shall be equipped with operational fuel gas volume flowmeter and vapor recovery gas volume flowmeter. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Exhaust gas stack shall be equipped with adequate provisions facilitating the collection of gas samples consistent with EPA Test Methods. [District NSR Rule and 1081] Federally Enforceable Through Title V Permit
3. Only PUC quality natural gas and noncondensable TVR gas from tank battery and associated FWKO vessels served by vapor control system listed on S-1132-8, S-1132-90, S-1131-885, S-1131-1040, and TEOR vapor control gas from S-1131-903 and -909 shall be combusted in this unit without prior District approval. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. Emissions from the steam generator shall not exceed any of the following limits: 0.055 lb-SO<sub>x</sub>/MMBtu, 0.013 lb-PM<sub>10</sub>/MMBtu, or 0.0028 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 15 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.0182 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rules 2201, 4301, 5.2, 4305, 5.1, 4306, 5.1, and 4351, 5.1] Federally Enforceable Through Title V Permit
7. During start-up and shutdown periods, emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.25 and 3.22] Federally Enforceable Through Title V Permit
9. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 4305, 5.5.6 and 4306, 5.3] Federally Enforceable Through Title V Permit
10. Emissions from the steam generator shall not exceed either of the following limits: 54.0 lb-NO<sub>x</sub>/day or 55.5 lb-CO/day. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. Source testing to measure natural gas-combustion NO<sub>x</sub> 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, 6.3.1, 4306, 6.3.1, and 4351, 6.3.1] Federally Enforceable Through Title V Permit
12. 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
13. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [County Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus)] Federally Enforceable Through Title V Permit
14. If the steam generator is fired on PUC-regulated natural gas, then the permittee shall maintain on file copies of all natural gas bills or fuel throughput records for a period of five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. If the steam generator is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the engine shall be determined using ASTM D 1072, D 3031, D 4084, D 3246, double GC for H<sub>2</sub>S and mercaptans, or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. If the steam generator is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that 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 quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
17. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
18. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
19. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.4 and 4306, 5.4] 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. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, NO<sub>x</sub> (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, stack gas moisture content - EPA Method 4, stack gas velocities - EPA Method 2, and fuel gas sulfur content - ASTM D3246 or double GC for H<sub>2</sub>S and mercaptans. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
21. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5.1 and 4306, 5.5.1] Federally Enforceable Through Title V Permit
22. 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
23. 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
24. 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
25. Annual test results submitted to the District from unit(s) representing a group of units may be used to measure NO<sub>x</sub> and CO emissions of this permit for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NO<sub>x</sub> and CO emission limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. (This requirement shall not supersede a more stringent NSR or PSD permit testing requirement.) [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
26. The following conditions must be met for representative unit(s) to be used to test for NO<sub>x</sub> and CO limits for a group of units: 1) all units are initially source tested and emissions from each unit in group are less than 90% of the permitted value and vary 25% or less from the average of all runs, 2) all units in group are similar in terms of rated heat input (rating not to exceed 100 MMBtu/hr), make and series, operation conditions, and control method, and 3) the group is owned by a single owner and located at a single stationary source. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
27. All units in a group for which representative units are source tested for NO<sub>x</sub> and CO emissions shall have received the same maintenance and tune-up procedures as the representative unit(s). [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
28. All units in a group for which representative units are source tested to for NO<sub>x</sub> and CO emissions of this permit shall be fired on the same fuel type during the entire compliance period. If a unit switches for any time to an alternate fuel type then that unit shall not be considered part of the group and shall be required to undergo a source test for all fuel types used, within one year of the switch. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
29. The number of representative units source tested for NO<sub>x</sub> and CO emissions shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that in 3 years, all units in the entire group will have been tested at least once. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
30. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

31. Permittee shall maintain daily records of volume of natural gas burned and vapor recovery system gas incinerated. [District NSR Rule] Federally Enforceable Through Title V Permit
32. Copies of all gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any non-certified fuel. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
33. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 6.1, and 4306, 6.1] Federally Enforceable Through Title V Permit
34. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of District Rules 4201, 4301 and 4801. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
35. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c 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
36. Formerly S-1143-5.

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1131-880-11

**EXPIRATION DATE:** 02/28/2007

**SECTION:** 04 **TOWNSHIP:** 29S **RANGE:** 28E

**EQUIPMENT DESCRIPTION:**

62.5 MMBTU/HR STRUTHERS NATURAL GAS/VAPOR RECOVERY GAS-FIRED STEAM GENERATOR #140 WITH A NORTH AMERICAN MODEL #GLE-4231 LOW-NOX BURNER AND FLUE GAS RECIRCULATION (CENTRAL PLANT)

## PERMIT UNIT REQUIREMENTS

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1. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
2. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
3. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
4. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
5. Steam generator shall be equipped with operational fuel gas volume flowmeter and vapor recovery gas volume flowmeter. [District NSR Rule] Federally Enforceable Through Title V Permit
6. All wells producing from strata steamed by this unit shall be connected to a District-approved emissions control system, have District-approved closed casing vents or be District-approved uncontrolled cyclic wells. [District Rule 4401] 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. Only PUC quality natural gas and noncondensable TVR gas from tank battery and associated FWKO vessels served by vapor control system listed on S-1132-8, S-1132-90, S-1131-885, S-1131-1040, and TEOR vapor control gas from S-1131-903 and -909 shall be combusted in this unit without prior District approval. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Permittee shall measure and record, at least monthly, the sulfur content and BTU content of the vapor recovery gas incinerated in this unit. [District Rule 1081] Federally Enforceable Through Title V Permit
9. Permittee shall measure and record the natural gas sulfur content and BTU content at the time of NO<sub>x</sub> testing, except for natural gas purchased from a PUC regulated utility. [District NSR Rule and District Rule 1081] Federally Enforceable Through Title V Permit
10. The permittee shall keep daily records of the amount of natural gas combusted and the amount of TEOR/TVR gas incinerated. [District NSR Rule and 1070] Federally Enforceable Through Title V Permit
11. Emission rates shall not exceed any of the following: SO<sub>x</sub> (as SO<sub>2</sub>): 105.1 lb/day, PM<sub>10</sub>: 19.2 lb/day, or VOC: 4.2 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Emission rates, except during startup and shutdown, shall not exceed any of the following: NO<sub>x</sub> (as NO<sub>2</sub>): 0.018 lb/MMBtu or 15 ppmvd @ 3% O<sub>2</sub>, or CO: 1.90 lb/hr or 41 ppmvd @3% O<sub>2</sub>. [District NSR Rule and District Rules 4305, 5.1 and 4306, 5.1] Federally Enforceable Through Title V Permit
13. 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
14. 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
15. The stack concentration of NO<sub>x</sub> (as NO<sub>2</sub>), CO, and O<sub>2</sub> shall be measured at least on a monthly basis, using District approved portable analyzers, in any calendar month in which the unit operates. [District Rules 2201, 2520, 9.3.2, 4305 and 4306] Federally Enforceable Through Title V Permit
16. 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
17. Source testing to measure natural gas-combustion NO<sub>x</sub> 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 2520. 9.3.2, 4305, 6.3.1 and 4306, 6.3.1] Federally Enforceable Through Title V Permit
18. Compliance demonstration (source testing) shall be conducted by independent testing laboratories and shall be witnessed, or authorized by the District. Sample collection shall be done by ARB certified testing laboratory. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
19. 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
20. 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
21. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, NO<sub>x</sub> (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<sub>x</sub> (lb/MMBtu) - ARB Method 100 and EPA Method 19, fuel gas sulfur content - ASTM D3246 or double GC for H<sub>2</sub>S and mercaptans, or other test methods approved by the District. [District Rules 1081, 4305, 6.2 and 4306, 6.2] 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.

22. Copies of all gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
23. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO<sub>2</sub>, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3 and Kern County Rules 404 and 408] Federally Enforceable Through Title V Permit
24. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO<sub>2</sub>. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rules 2520, 9.3.2 and 4301, 5.2.1] Federally Enforceable Through Title V Permit
25. 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, 9.3.2] Federally Enforceable Through Title V Permit
26. When complying with SO<sub>x</sub> emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6, 6A, 6B, 6C; or Method 8 or ARB Method 1-100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by double GC performed in the laboratory and EPA Method 19 to calculated emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months, however annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
27. If the unit is fired on noncertified gaseous fuel and compliance with SO<sub>x</sub> emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by double GC performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
28. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2; 4305, 6.2.1; and 4306, 6.2.1] Federally Enforceable Through Title V Permit
29. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period [Kern County Rule 407]. To demonstrate compliance with this requirement the operator shall do one of the following: fire the unit only on PUC or FERC regulated natural gas or test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
30. Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 140 lb/hr, calculated as NO<sub>2</sub>. [District Rules 4301, 5.2.2 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
31. Emissions for this unit shall be calculated using the arithmetic mean, pursuant to District Rule 1081 (Amended December 16, 1993), of 3 thirty-minute test runs for NO<sub>x</sub> and CO. [District Rule 2520, 9.3.2] 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.

32. Annual test results submitted to the District from unit(s) representing a group of units may be used to measure NOx and CO emissions of this permit for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NOx emission limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. (This requirement shall not supersede a more stringent NSR or PSD permit testing requirement.) [District Rules 4305, 6.3.2 and 4306, 6.3.2] Federally Enforceable Through Title V Permit
33. The following conditions must be met for representative unit(s) to be used to test for NOx and CO limits for a group of units: 1) all units are initially source tested and emissions from each unit in group are less than 90% of the permitted value and vary 25% or less from the average of all runs, 2) all units in group are similar in terms of rated heat input (rating not to exceed 100 MMBtu/hr), make and series, operation conditions, and control method, and 3) the group is owned by a single owner and located at a single stationary source. [District Rule 2520, 9.3.2, 4305, 6.3.2 and 4306, 6.3.2] Federally Enforceable Through Title V Permit
34. All units in a group for which representative units are source tested for NOx and CO emissions shall have received the same maintenance and tune-up procedures as the representative unit(s). These tune-up procedures shall be completed according to District Rule 4304 (Adopted October 19, 1995) and tune-up test results shall show comparable results for each unit in the group. [District Rules 2520, 9.3.2, 4305, 6.3.2 and 4306, 6.3.2] Federally Enforceable Through Title V Permit
35. All units in a group for which representative units are source tested to for NOx and CO emissions of this permit shall be fired on the same fuel type during the entire compliance period. If a unit switches for any time to an alternate fuel type (e.g. from natural gas to oil) then that unit shall not be considered part of the group and shall be required to undergo a source test for all fuel types used, within one year of the switch. [District Rules 2520, 9.3.2, 4305, 6.3.2 and 4306, 6.3.2] Federally Enforceable Through Title V Permit
36. The number of representative units source tested for NOx and CO emissions shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that in 3 years, all units in the entire group will have been tested at least once. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
37. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of District Rules 4201, 4301 and 4801. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
38. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c 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
39. Formerly S-1143-6-8.

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1131-881-12

**EXPIRATION DATE:** 02/28/2007

**SECTION:** 04 **TOWNSHIP:** 29S **RANGE:** 28E

**EQUIPMENT DESCRIPTION:**

62.5 MMBTU/HR STRUTHERS NATURAL GAS/VAPOR RECOVERY GAS-FIRED STEAM GENERATOR WITH A NORTH AMERICAN GLE LOW-NOX BURNER WITH FLUE GAS RECIRCULATION (FGR) AND AN O2 CONTROLLER (CENTRAL PLANT)

## PERMIT UNIT REQUIREMENTS

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1. Steam generator shall be equipped with the following operational instrumentation: fuel gas volume flowmeter, vapor recovery gas volume flowmeter. [District NSR Rule and 4305] Federally Enforceable Through Title V Permit
2. All wells producing from strata steamed by this unit shall be connected to a District-approved emissions control system, have District-approved closed casing vents or be District-approved uncontrolled cyclic wells. [District Rule 4401] Federally Enforceable Through Title V Permit
3. Only PUC quality natural gas and noncondensable TVR gas from tank battery and associated FWKO vessels served by vapor control system listed on S-1132-8, S-1132-90, S-1131-885, S-1131-1040, and TEOR vapor control gas from S-1131-903 and -909 shall be combusted in this unit without prior District approval. [District NSR Rule] Federally Enforceable Through Title V Permit
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
7. Emissions from the steam generator shall not exceed any of the following limits: 0.07 lb-SO<sub>x</sub>/MMBtu, 0.013 lb-PM<sub>10</sub>/MMBtu, or 0.0028 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Except during start-up and shutdown periods emissions from the steam generator shall not exceed any of the following limits: 15 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.0182 lb-NO<sub>x</sub>/MMBtu or 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu. [District Rules 2201, 4301, 5.2, 4305, 5.1, 4306, 5.1, and 4351, 5.1] Federally Enforceable Through Title V Permit
9. During start-up and shutdown periods, emissions from the steam generator shall not exceed either of the following limits: 0.1 lb-NO<sub>x</sub>/MMBtu or 0.084 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306, 3.25 and 3.22] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 4305, 5.5.6 and 4306, 5.3] Federally Enforceable Through Title V Permit
12. Emissions from the steam generator shall not exceed either of the following limits: 54.0 lb-NOx/day or 55.5 lb-CO/day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Source testing to measure natural gas-combustion NOx 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, 6.3.1, 4306, 6.3.1, and 4351, 6.3.1] Federally Enforceable Through Title V Permit
14. 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
15. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
16. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [County Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus)] Federally Enforceable Through Title V Permit
17. If the steam generator is fired on PUC-regulated natural gas, then the permittee shall maintain on file copies of all natural gas bills or fuel throughput records for a period of five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
18. If the steam generator is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the engine shall be determined using ASTM D 1072, D 3031, D 4084, D 3246, double GC for H2S and mercaptans, or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
19. If the steam generator is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that 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 quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
20. 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, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
21. 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, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

22. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
23. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, NO<sub>x</sub> (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, stack gas moisture content - EPA Method 4, stack gas velocities - EPA Method 2, and fuel gas sulfur content - ASTM D3246 or double GC for H<sub>2</sub>S and mercaptans. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
24. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2; 4305, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit
25. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5.1 and 4306, 5.5.1] 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. 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
27. 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
28. 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
29. Annual test results submitted to the District from unit(s) representing a group of units may be used to measure NO<sub>x</sub> and CO emissions of this permit for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NO<sub>x</sub> and CO emission limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. (This requirement shall not supersede a more stringent NSR or PSD permit testing requirement.) [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
30. The following conditions must be met for representative unit(s) to be used to test for NO<sub>x</sub> and CO limits for a group of units: 1) all units are initially source tested and emissions from each unit in group are less than 90% of the permitted value and vary 25% or less from the average of all runs, 2) all units in group are similar in terms of rated heat input (rating not to exceed 100 MMBtu/hr), make and series, operation conditions, and control method, and 3) the group is owned by a single owner and located at a single stationary source. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
31. All units in a group for which representative units are source tested for NO<sub>x</sub> and CO emissions shall have received the same maintenance and tune-up procedures as the representative unit(s). [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
32. All units in a group for which representative units are source tested to for NO<sub>x</sub> and CO emissions of this permit shall be fired on the same fuel type during the entire compliance period. If a unit switches for any time to an alternate fuel type then that unit shall not be considered part of the group and shall be required to undergo a source test for all fuel types used, within one year of the switch. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] 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.

33. The number of representative units source tested for NO<sub>x</sub> and CO emissions shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that in 3 years, all units in the entire group will have been tested at least once. [District Rules 2520, 9.3.2, 4305, 6.3.2, 4306, 6.3.2, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
34. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
35. Permittee shall measure and record, at least monthly, the sulfur content and BTU content of the vapor recovery gas incinerated in this unit. [District Rule 1081] Federally Enforceable Through Title V Permit
36. Permittee shall measure and record the natural gas sulfur content and BTU content at the time of NO<sub>x</sub> testing, except for natural gas purchased from a PUC regulated utility. [District NSR Rule and District Rule 1081] Federally Enforceable Through Title V Permit
37. Permittee shall maintain daily records of volume of natural gas burned and vapor recovery system gas incinerated. [District NSR Rule] Federally Enforceable Through Title V Permit
38. Copies of all gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any non-certified fuel. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
39. 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, 6.1, and 4306, 6.1] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of District Rules 4201, 4301 and 4801. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. 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) and 40 CFR 60.40c 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
42. Formerly S-1143-6-8.

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

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**DRAFT**

**PERMIT NO:** S-1131-883-11

**ISSUANCE DATE:** 03/07/2005

**LEGAL OWNER OR OPERATOR:** CHEVRON USA INC  
**MAILING ADDRESS:** PO BOX 1392  
BAKERSFIELD, CA 93302

**LOCATION:** HEAVY OIL CENTRAL  
KERN COUNTY, CA

**SECTION:** 4 **TOWNSHIP:** 29S **RANGE:** 28E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 62.5 MMBTU/HR STRUTHERS NATURAL GAS/VAPOR RECOVERY GAS FIRED STRUTHERS STEAM GENERATOR (#143) WITH FGR AND O2 CONTROLLER (CENTRAL PLANT): RETROFIT THE STEAM GENERATOR WITH A NORTH AMERICAN MODEL GLE MAGNA-FLAME (OR DISTRICT APPROVED EQUIVALENT) LOW NOX BURNER TO ACHIEVE 15 PPMVD-NOX @ 3% O2 (0.0182 LB-NOX/MMBTU)

**CONDITIONS**

1. {1829} The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Permits to Operate (PTOs) S-1127-244, and S-1131-711, -712, -713, -882, -929, -979, -981, -988, -989, -991, and -1028 shall be cancelled not later than the date of initial operation of this modified emissions unit. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The permittee shall obtain written District approval for the use of any equivalent equipment not specifically approved by this Authority to Construct. Approval of the equivalent equipment shall be made only after the District's determination that the submitted design and performance of the proposed alternate equipment is equivalent to the specifically authorized equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The permittee's request for approval of equivalent equipment shall include the make, model, manufacturer's maximum rating, manufacturer's guaranteed emission rates, equipment drawing(s), and operational characteristics/parameters. [District Rule 2010] Federally Enforceable Through Title V Permit
5. Alternate equipment shall be of the same class and category of source as the equipment authorized by the Authority to Construct. [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

**DRAFT**

DAVID WARNER, Director of Permit Services

S-1131-883-11: Apr 26 2010 3:45PM - RICKARDK : Joint Inspection NOT Required