



OCT 16 2014

Mr. Gregory Pritchett  
Chevron USA Inc  
PO Box 1392  
Bakersfield, CA 93302

**Re: Notice of Minor Title V Permit Modification  
District Facility # S-3317  
Project # 1143501**

Dear Mr. Pritchett:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authority to Construct (ATC) S-3317-1-10 into the Title V operating permit. The project identically replaces a 1200 hp spark-ignited lean-burn IC engine powering a compressor.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct (ATC) S-3317-1-10, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

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

Thank you for your cooperation in this matter.

Sincerely,



Arnaud Marjollet  
Director of Permit Services

Enclosures

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

**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  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061

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

# TITLE V APPLICATION REVIEW

Minor Modification  
Project #: S-1143501

Engineer: Richard Edgehill  
Date: October 7, 2014

Facility Number: S-3317  
Facility Name: Chevron USA Inc  
Mailing Address: PO Box 1392  
Bakersfield, CA 93302

*RWK*  
*10-13-14*

Contact Name: Gregory Pritchett and Lance Ericksen  
Lance.Ericksen@chevron.com  
Phone: (661) 654-7145  
Responsible Official: Ian Shewmaker  
Title: SJV Field Team Leader

## I. PROPOSAL

Chevron USA Inc (CUSA) is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct (ATC) S-3317-1-10. The project identically replaces a 1200 hp spark-ignited lean-burn IC engine powering a compressor.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

## II. FACILITY LOCATION

The IC engine is located at the Lost Hills Compression Facility, west of the former Lost Hills Gas Plant within the NE/4 of Section 15, Township 27S, Range 21E.

## III. EQUIPMENT DESCRIPTION

PTO S-3317-1-11: 1200 HP SUPERIOR MODEL 2406 G NATURAL GAS-FIRED  
LEAN-BURN IC ENGINE (SERIAL NUMBER 340209) DRIVING A  
GAS COMPRESSOR SERVING NATURAL GAS DISTRIBUTION  
AND SALES PIPELINE

#### **IV. SCOPE OF EPA AND PUBLIC REVIEW**

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

#### **V. APPLICABLE REQUIREMENTS**

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

#### **VI. DESCRIPTION OF PROPOSED MODIFICATIONS**

The draft PTO includes all of the conditions on the current PTO S-3317-1-8.

#### **VII. COMPLIANCE**

In accordance with Rule 2520, 3.20, these modifications:

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

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

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

## **VIII. ATTACHMENTS**

- I. Proposed Modified Title V Operating Permit
- II. Authority to Construct
- III. Application
- IV. Previous Title V Operating Permit

Attachment A  
Proposed Title V draft PTO

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-3317-1-11

**EXPIRATION DATE:** 11/30/2014

**SECTION:** NE15 **TOWNSHIP:** 27S **RANGE:** 21E

**EQUIPMENT DESCRIPTION:**

1200 HP SUPERIOR MODEL 2406 G NATURAL GAS-FIRED LEAN-BURN IC ENGINE (SERIAL NUMBER 340209)  
DRIVING A GAS COMPRESSOR SERVING NATURAL GAS DISTRIBUTION AND SALES PIPELINE

## PERMIT UNIT REQUIREMENTS

1. When designated as a dormant emissions unit, the fuel supply line shall be physically disconnected from the emission unit. [District Rule 2080] Federally Enforceable Through Title V Permit
2. Source testing is required within 60 days of recommencing operation if a source test has not been performed within the past 24 months. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
3. During non operation of this unit, the permittee shall not be required to perform source testing, fuel sulfur content certification, and monitoring requirements. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
4. Permittee shall maintain accurate records of the time and duration of non operation of this unit. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
6. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
7. Total sulfur content of natural gas combusted shall not exceed 1.0 grain/100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The permittee shall install and operate a nonresettable elapsed operating time meter. In lieu of installing a nonresettable time meter, the owner of an engine may use an alternative device, method, or technique, in determining operating time provided that the alternative is approved by the APCO and is allowed by Permit-to-Operate. The owner of the engine shall properly maintain and operate the time meter or alternative device in accordance with the manufacturer's instructions. [District Rule 4702] Federally Enforceable Through Title V Permit
9. Emission rates shall not exceed any of the following: PM10: 0.18 g/bhp-hr, NOx (as NO2): 65 ppmv @ 15% O2, VOC: 400 ppmv @ 15% O2, or CO 530 ppmv @ 15% O2. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
10. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702] Federally Enforceable Through Title V Permit
11. This engine shall be operated within the ranges that the source testing has shown result in pollution concentrations within the emissions limits as specified on this permit. [District Rule 4702] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. 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 engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702] Federally Enforceable Through Title V Permit
13. If either the NO<sub>x</sub> or CO concentrations corrected to 15% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, 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 Rule 4702] Federally Enforceable Through Title V Permit
14. 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 Rule 4702] Federally Enforceable Through Title V Permit
15. 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 15% 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 Rule 4702] Federally Enforceable Through Title V Permit
16. Source testing to measure natural gas-combustion NO<sub>x</sub>, CO, and VOC emissions from this unit shall be measured at least once every 24 months. [District Rule 4702] Federally Enforceable Through Title V Permit
17. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702] Federally Enforceable Through Title V Permit
18. 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. VOC emissions shall be reported as methane. VOC, NO<sub>x</sub>, and CO concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702] Federally Enforceable Through Title V Permit
19. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) - EPA Method 18, 25A or 25B, or ARB Method 100. [District Rules 1081 and 4702] Federally Enforceable Through Title V Permit
20. 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
21. 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
22. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rule 4702] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702] Federally Enforceable Through Title V Permit
24. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [District Rule 4801] Federally Enforceable Through Title V Permit
25. If the engine 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] Federally Enforceable Through Title V Permit
26. If the engine 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 method D 1072, D 3031, D 4084, D 3246 or double GC for H<sub>2</sub>S and mercaptans. [District Rule 2520] Federally Enforceable Through Title V Permit
27. If the engine 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. If more than one engine utilizes the same fuel source, one representative sample can be taken from the shared fuel source. [District Rule 2520] Federally Enforceable Through Title V Permit
28. The engine shall be in full compliance with 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
29. IC engine shall meet the definition of "remote stationary RICE", as defined in 40 CFR Part 63, Subpart ZZZZ, subsection 63.6675. The Permittee must evaluate the remote status of their stationary RICE every 12 months. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
30. The permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
31. The engine's oil and filter shall be changed every 2,160 hours of operation or every 12 months, whichever comes first. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
32. The engine's spark plugs shall be inspected every 2,160 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
33. The engine's hoses and belts shall be inspected every 2,160 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
34. The permittee shall maintain monthly records that include any information necessary to demonstrate compliance with 40 CFR 63, ZZZZ. [District Rule 1070 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
35. The permittee shall maintain monthly records of all performance tests and required maintenance performed on the air pollution control and monitoring equipment. [District Rule 1070 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
36. The permittee shall maintain monthly records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. The permittee shall also maintain monthly records of action taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [District Rule 1070 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

37. The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d of Subpart ZZZZ. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
38. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available to the APCO upon request. [District Rule 4702] Federally Enforceable Through Title V Permit

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

DRAFT

Attachment B  
Authority to Construct

# AUTHORITY TO CONSTRUCT

PERMIT NO: S-3317-1-10

ISSUANCE DATE: 08/25/2014

LEGAL OWNER OR OPERATOR: CHEVRON U S A INC  
MAILING ADDRESS: PO BOX 1392  
BAKERSFIELD, CA 93302

LOCATION: WEST OF LOST HILLS GAS PLANT  
LOST HILLS, CA

SECTION: NE15 TOWNSHIP: 27S RANGE: 21E

## EQUIPMENT DESCRIPTION:

MODIFICATION OF 1200 HP SUPERIOR MODEL 2406 G NATURAL GAS-FIRED LEAN-BURN IC ENGINE DRIVING A GAS COMPRESSOR SERVING NATURAL GAS DISTRIBUTION AND SALES PIPELINE: IDENTICAL ROUTINE REPLACEMENT

## CONDITIONS

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1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. When designated as a dormant emissions unit, the fuel supply line shall be physically disconnected from the emission unit. [District Rule 2080] Federally Enforceable Through Title V Permit
3. Source testing is required within 60 days of recommencing operation if a source test has not been performed within the past 24 months. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
4. During non operation of this unit, the permittee shall not be required to perform source testing, fuel sulfur content certification, and monitoring requirements. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
5. Permittee shall maintain accurate records of the time and duration of non operation of this unit. [District Rules 2201 and 4702] 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

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO

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Arnaud Marjollet, Director of Permit Services

S-3317-1-10 Oct 8 2014 9:12AM -- EDGEHILR Joint Inspection NOT Required

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308 • (661) 392-5500 • Fax (661) 392-5585

7. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
8. Total sulfur content of natural gas combusted shall not exceed 1.0 grain/100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The permittee shall install and operate a nonresettable elapsed operating time meter. In lieu of installing a nonresettable time meter, the owner of an engine may use an alternative device, method, or technique, in determining operating time provided that the alternative is approved by the APCO and is allowed by Permit-to-Operate. The owner of the engine shall properly maintain and operate the time meter or alternative device in accordance with the manufacturer's instructions. [District Rule 4702] Federally Enforceable Through Title V Permit
10. Emission rates shall not exceed any of the following: PM10: 0.18 g/bhp-hr, NOx (as NO2): 65 ppmv @ 15% O2, VOC: 400 ppmv @ 15% O2, or CO 530 ppmv @ 15% O2. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
11. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702] Federally Enforceable Through Title V Permit
12. This engine shall be operated within the ranges that the source testing has shown result in pollution concentrations within the emissions limits as specified on this permit. [District Rule 4702] Federally Enforceable Through Title V Permit
13. 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 engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702] Federally Enforceable Through Title V Permit
14. If either the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the allowable emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, 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 Rule 4702] Federally Enforceable Through Title V Permit
15. 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 Rule 4702] Federally Enforceable Through Title V Permit
16. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4702] Federally Enforceable Through Title V Permit
17. Source testing to measure natural gas-combustion NOx, CO, and VOC emissions from this unit shall be measured at least once every 24 months. [District Rule 4702] Federally Enforceable Through Title V Permit
18. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

19. 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. VOC emissions shall be reported as methane. VOC, NO<sub>x</sub>, and CO concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702] Federally Enforceable Through Title V Permit
20. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) - EPA Method 18, 25A or 25B, or ARB Method 100. [District Rules 1081 and 4702] Federally Enforceable Through Title V Permit
21. 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
22. 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
23. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rule 4702] Federally Enforceable Through Title V Permit
24. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702] Federally Enforceable Through Title V Permit
25. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [District Rule 4801] Federally Enforceable Through Title V Permit
26. If the engine 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] Federally Enforceable Through Title V Permit
27. If the engine 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 method D 1072, D 3031, D 4084, D 3246 or double GC for H<sub>2</sub>S and mercaptans. [District Rule 2520] Federally Enforceable Through Title V Permit
28. If the engine 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. If more than one engine utilizes the same fuel source, one representative sample can be taken from the shared fuel source. [District Rule 2520] Federally Enforceable Through Title V Permit
29. The engine shall be in full compliance with 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
30. IC engine shall meet the definition of "remote stationary RICE", as defined in 40 CFR Part 63, Subpart ZZZZ, subsection 63.6675. The Permittee must evaluate the remote status of their stationary RICE every 12 months. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
31. The permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
32. The engine's oil and filter shall be changed every 2,160 hours of operation or every 12 months, whichever comes first. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

33. The engine's spark plugs shall be inspected every 2,160 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
34. The engine's hoses and belts shall be inspected every 2,160 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
35. The permittee shall maintain monthly records that include any information necessary to demonstrate compliance with 40 CFR 63, ZZZZ. [District Rule 1070 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
36. The permittee shall maintain monthly records of all performance tests and required maintenance performed on the air pollution control and monitoring equipment. [District Rule 1070 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
37. The permittee shall maintain monthly records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. The permittee shall also maintain monthly records of action taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [District Rule 1070 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
38. The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d of Subpart ZZZZ. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
39. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available to the APCO upon request. [District Rule 4702] Federally Enforceable Through Title V Permit

# Attachment C Application

5-3317-1-11

# San Joaquin Valley Air Pollution Control District RECEIVED

www.valleyair.org

AUG 25 2014

SJVAPCD  
Southern Region

## Permit Application For:

ADMINISTRATIVE AMENDMENT     MINOR MODIFICATION     SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: CHEVRON U.S.A. INC.	
2. MAILING ADDRESS:  STREET/P.O. BOX: <u>PO BOX 1392</u>  CITY: <u>BAKERSFIELD</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93302</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:  STREET: <u>Light Oil Western Source</u> CITY: _____  _____ ¼ SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: CRUDE OIL AND GAS PRODUCTION	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)  <b>Routine Replacement of Carneras Engine S-3317-1</b>	
6. TYPE OR PRINT NAME OF APPLICANT:  Gregory E. Pritchett	TITLE OF APPLICANT: HES Manager
7. SIGNATURE OF APPLICANT:  <i>Gregory E. Pritchett</i>	DATE: <u>8/25/2014</u> PHONE : (661) 654-7145 FAX: (661) 654-7606 EMAIL: Lance.Ericksen@chevron.com

**For APCD Use Only:**

DATE STAMP	FILING FEE RECEIVED: \$ <u>          </u> CHECK#: _____ DATE PAID: _____ PROJECT NO: <u>S-1143501</u> FACILITY ID: <u>S-3317</u>
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*no money*

San Joaquin Valley  
Unified Air Pollution Control District

RECEIVED  
AUG 25 2014  
SJVAPCD  
Southern Region

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION                       ADMINISTRATIVE  
 MINOR PERMIT MODIFICATION                                       AMENDMENT

COMPANY NAME: <b>CHEVRON U.S.A. INC.</b>	FACILITY ID: <b>S-3317</b>
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: <b>CHEVRON U.S.A. INC.</b>	
3. Agent to the Owner: <b>N/A</b>	

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

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

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

*Ian Shewmaker*  
Signature of Responsible Official

8-25-14  
Date

Ian Shewmaker

Name of Responsible Official (please print)

Routine Replacement of Engine S-3317-1

SJV Field Team Leader

Title of Responsible Official (please print)

Attachment D  
Previous Title V Operating Permit

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-3317-1-8

**EXPIRATION DATE:** 11/30/2014

**SECTION:** NE15 **TOWNSHIP:** 27S **RANGE:** 21E

**EQUIPMENT DESCRIPTION:**

1200 HP SUPERIOR MODEL 2406 G NATURAL GAS-FIRED LEAN-BURN IC ENGINE DRIVING A GAS COMPRESSOR SERVING NATURAL GAS DISTRIBUTION AND SALES PIPELINE

## PERMIT UNIT REQUIREMENTS

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1. When designated as a dormant emissions unit, the fuel supply line shall be physically disconnected from the emission unit. [District Rule 2080] Federally Enforceable Through Title V Permit
2. Source testing is required within 60 days of recommencing operation if a source test has not been performed within the past 24 months. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
3. During non operation of this unit, the permittee shall not be required to perform source testing, fuel sulfur content certification, and monitoring requirements. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
4. Permittee shall maintain accurate records of the time and duration of non operation of this unit. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
6. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
7. Total sulfur content of natural gas combusted shall not exceed 1.0 grain/100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The permittee shall install and operate a nonresettable elapsed operating time meter. In lieu of installing a nonresettable time meter, the owner of an engine may use an alternative device, method, or technique, in determining operating time provided that the alternative is approved by the APCO and is allowed by Permit-to-Operate. The owner of the engine shall properly maintain and operate the time meter or alternative device in accordance with the manufacturer's instructions. [District Rule 4702] Federally Enforceable Through Title V Permit
9. Emission rates shall not exceed any of the following: PM10: 0.18 g/bhp-hr, NOx (as NO2): 65 ppmv @ 15% O2, VOC: 400 ppmv @ 15% O2, or CO 530 ppmv @ 15% O2. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
10. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702] Federally Enforceable Through Title V Permit
11. This engine shall be operated within the ranges that the source testing has shown result in pollution concentrations within the emissions limits as specified on this permit. [District Rule 4702] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. 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 engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702] Federally Enforceable Through Title V Permit
13. If either the NO<sub>x</sub> or CO concentrations corrected to 15% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, 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 Rule 4702] Federally Enforceable Through Title V Permit
14. 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 Rule 4702] Federally Enforceable Through Title V Permit
15. 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 15% 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 Rule 4702] Federally Enforceable Through Title V Permit
16. Source testing to measure natural gas-combustion NO<sub>x</sub>, CO, and VOC emissions from this unit shall be measured at least once every 24 months. [District Rule 4702] Federally Enforceable Through Title V Permit
17. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702] Federally Enforceable Through Title V Permit
18. 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. VOC emissions shall be reported as methane. VOC, NO<sub>x</sub>, and CO concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702] Federally Enforceable Through Title V Permit
19. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) - EPA Method 18, 25A or 25B, or ARB Method 100. [District Rules 1081 and 4702] Federally Enforceable Through Title V Permit
20. 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
21. 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
22. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rule 4702] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702] Federally Enforceable Through Title V Permit
24. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [District Rule 4801] Federally Enforceable Through Title V Permit
25. If the engine 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] Federally Enforceable Through Title V Permit
26. If the engine 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 method D 1072, D 3031, D 4084, D 3246 or double GC for H<sub>2</sub>S and mercaptans. [District Rule 2520] Federally Enforceable Through Title V Permit
27. If the engine 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. If more than one engine utilizes the same fuel source, one representative sample can be taken from the shared fuel source. [District Rule 2520] Federally Enforceable Through Title V Permit
28. The engine shall be in full compliance with 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
29. IC engine shall meet the definition of "remote stationary RICE", as defined in 40 CFR Part 63, Subpart ZZZZ, subsection 63.6675. The Permittee must evaluate the remote status of their stationary RICE every 12 months. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
30. The permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
31. The engine's oil and filter shall be changed every 2,160 hours of operation or every 12 months, whichever comes first. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
32. The engine's spark plugs shall be inspected every 2,160 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
33. The engine's hoses and belts shall be inspected every 2,160 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
34. The permittee shall maintain monthly records that include any information necessary to demonstrate compliance with 40 CFR 63, ZZZZ. [District Rule 1070 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
35. The permittee shall maintain monthly records of all performance tests and required maintenance performed on the air pollution control and monitoring equipment. [District Rule 1070 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
36. The permittee shall maintain monthly records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. The permittee shall also maintain monthly records of action taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [District Rule 1070 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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37. The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d of Subpart ZZZZ. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
38. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available to the APCO upon request. [District Rule 4702] Federally Enforceable Through Title V Permit

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